

TRANSITIONING TO WHAT?

LEGAL STATUSES AVAILABLE AFTER TEMPORARY PROTECTION FOR PEOPLE DISPLACED FROM
UKRAINE, PAPER 3: POLAND AND ITALY

■ Authors

ANGELIKA KOTULAK-TARAS

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Introduction to Working Paper Series: Transitioning out of the TPD

This Working Paper is one of a series of working papers published by ECRE in cooperation with Brussels School of Governance (BSoG) at the Vrije Universiteit Brussel (VUB) investigating what is likely to happen after the end of the Temporary Protection Directive (TPD) protection regime and national equivalents.

The Working Papers analyse the options available in law and whether they are actually accessible in practice for those currently benefiting from temporary protection (TP) status, considering a total of 12 countries as case studies.

The starting point for the research was previous studies on the options available after the end of the TPD, currently extended until March 2027, including ECRE's paper [*Transitioning Out of the Temporary Protection Directive*](#), and the pressing need to ensure that the millions of people displaced from Ukraine will have access to status and rights if return to Ukraine – most people's favoured option – is not possible.

The three papers were prepared by students at BSoG under the Capstone in International and European Law course. They cover the following case studies:

- TPD Working Paper 1: Germany, Austria, Czechia, Estonia, Latvia, Lithuania and Republic of Moldova.
- TPD Working Paper 2: Belgium, Spain and France.
- TPD Working Paper 3: Italy and Poland.

After describing the legal statuses available, the papers provide recommendations for each country in turn. Analysing all three papers, the following conclusions can be drawn:

- *The risk of large-scale irregularity is high – along with related political crises*

Given the complex national landscapes, the often stringent requirements and/or opacity when it comes to other statuses, the absence of planning and the limited introduction of bridging statuses, the Working Papers collectively show that the risk of irregularity – or at least precarity of status – is high. It should be noted that there are probably already considerable numbers of people from Ukraine in irregular situations (although again reliable numbers are not available).

- *Political crises cannot be excluded*

The response to displacement from Ukraine has been exceptional in many senses; one of these is the absence of a political crisis linked to the arrival of refugees. The political panic, paralysis and tension between states that usually occur in situations of mass arrivals has not arisen for a [*variety of reasons*](#). The Working Papers underline that complacency should be avoided, however. The lack of preparedness, combined with the high numbers of displaced people, could lead to factors that provoke social tension and then related political conflict. For instance, irregularity is accompanied by exploitation, destitution and criminality. Or the difficulty in accessing secure, long-term status may increase onward movement. Anti-EU forces will be ready to take advantage of social tensions to generate and ride political crises and conflicts between and among Member States.

- *National protection statuses are very useful tools – but rules are highly opaque*

In all the country studies, a safety net is provided by the existence in law of national protection statuses, primarily used for people who require protection, but do not qualify for refugee or subsidiary protection statuses under EU law. Nonetheless, the Working Papers confirm the findings of previous research, such as ECRE's paper, [*Pathways to Protection*](#), that these

statuses appear to be used rarely (although only partial information is available), are highly discretionary, and the rules on their use are not transparent.

➤ *Bridging statuses should be introduced where not yet in place*

The value of bridging statuses that allow TP holders to transition to other statuses without a period of limbo appear to be highly valuable. Given the risks described above, ensuring that people currently benefit from TP can move to a bridging status while applying for, waiting for, organising or seeking to meet the eligibility criteria for other statuses is a useful management approach. All Member States should reflect on introducing this option.

The TPD as a residual status may be essential for the protection of vulnerable groups

All the Working Papers identify particular risks for vulnerable groups, and particularly those who are unable to access the labour market, for instance due to age, education level, language reasons or disability. The most obvious status to transition to is a work-based permit – host states are all struggling with labour shortages and have an interest in retaining refugees able to work. Nonetheless, first, requirements are often stringent, and, second, there is a significant divergence in labour market absorption rates for Ukrainian refugees. Given the even greater challenges of access to other statuses, the continued existence of the TPD appears wise, meaning further renewals after 2027. It is a safer safety net than national protection statuses.

➤ *A collective approach facilitated by the EU remains essential*

The generally excellent response to displacement from Ukraine has been undermined by the lack of long-term collective planning by the EU. One of the keys to the success of the response at the start was the assertive and protection-focussed leadership of the European Commission, which has since dissipated, with the post-TPD approach likely to be in the hands of the states, with a variety of national approaches leading to fragmentation. There are political factors that hinder EU leadership on long-term post-TPD planning, including the disinclination of Member States to work through the EU on migration issues beyond the CEAS, the presence of Russia-friendly governments in the Council, and the pressure from the government of Ukraine, for which return is the only acceptable outcome. Nonetheless, through guidance, funding and convening power, such as the EMN, the EU must support consistency across the EU for post-TPD scenarios. The Working Papers demonstrate the risk of fragmentation but also the potential for states adopting good practices from each other.

➤ *Societal support for a smooth transition remains key*

Given the complexity of the national legal environments and the challenges of proving eligibility for other statuses, support from independent and expert advisors and assistance bodies will be important. One of the reasons for the success of the TPD regime was the broader societal engagement. While the flood of international responders has already significantly reduced, the role for local civil society remains essential. Ensuring that local authorities, civil society, community organisations, and the Ukrainian Diaspora have the resources to support people through the transition to other statuses (or to voluntary return) is important.

ECRE Working Papers present research and analysis on asylum and migration. Their purpose is to stimulate debate by showcasing emerging ideas. Working Papers are commissioned by ECRE; the views they contain are those of their authors and do not necessarily represent ECRE's positions.

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LIST OF ABBREVIATIONS

CEAS	Common European Asylum System
AIDA	Asylum Information Database
AMIF	Asylum, Migration and Integration Fund
BTP	Beneficiary of Temporary Protection
CUKR	Zezwolenie na pobyt czasowy z kodem UKR (Bridging Permit in Poland)
ECRE	European Council on Refugees and Exiles
EUAA	European Union Agency for Asylum
LTRD	Long-Term Residence Directive
NGO	Non-Governmental Organisation
PESEL	Powszechny Elektroniczny System Ewidencji Ludności (population register)
<i>Questura</i>	Local police headquarters in Italy (handles immigration procedures)
TP	Temporary Protection
TPD	Temporary Protection Directive (Council Directive 2001/55/EC)
UKR	National status code for TP holders in Poland

GLOSSARY

AIDA (Asylum Information Database) – A comparative database managed by ECRE providing detailed, country-by-country information on asylum systems, temporary protection, and national legal frameworks.

AMIF (Asylum, Migration and Integration Fund) – An EU funding instrument supporting asylum systems, integration measures, administrative capacity, and voluntary return programs.

Beneficiaries of Temporary Protection (BTPs) – Individuals covered by the temporary protection regime, including Ukrainian nationals and eligible third-country nationals displaced by the Russian invasion.

CEAS (Common European Asylum System) – The EU legal and institutional framework regulating asylum procedures, reception standards, and refugee status determination across Member States.

CUKR Permit – A three-year Polish bridging residence permit (Zezwolenie na pobyt czasowy z kodem UKR) introduced in 2024, enabling eligible TP beneficiaries to remain legally after the expiry of temporary protection.

ECRE (European Council on Refugees and Exiles) – A pan-European NGO network producing research, policy analysis, and advocacy on asylum, refugee rights, and migration governance.

EUAA (European Union Agency for Asylum) – The EU agency supporting Member States with asylum procedures, temporary protection implementation, guidance, and monitoring.

LTD (Long-Term Residence Directive) – Directive 2003/109/EC granting long-term resident status to non-EU nationals after five years of legal residence; the recast proposal would count TP years toward eligibility.

NGO (Non-Governmental Organisation) – Independent civil society organisations providing support, legal aid, humanitarian assistance, and advocacy for refugees and migrants.

PESEL (Powszechny Elektroniczny System Ewidencji Ludności) – Poland's national population register assigning identification numbers to residents, including TP beneficiaries registered under UKR status.

Permesso per protezione temporanea – Italy's temporary protection residence permit granting legal stay and access to employment, healthcare, education, and social benefits.

Questura – Italy's local police authority responsible for immigration procedures, residence permits, and identity documentation.

Temporary Protection (TP) – An EU emergency mechanism (Directive 2001/55/EC) providing immediate and collective protection to large groups of people migrating without individual asylum procedures.

Temporary Protection Directive (TPD) – Council Directive 2001/55/EC establishing the legal framework for temporary protection, including rights, duration, and Member State obligations.

UKR Status – A national status under Poland's Special Act (2022) marking individuals in the PESEL register as beneficiaries of temporary protection, granting access to work, healthcare, education, and other services.

Unity Hubs – Advisory centers proposed under the Council Recommendation on the Coordinated Transition out of Temporary Protection (2025) providing multilingual guidance and counselling for TP beneficiaries preparing for post-2027 residence options.

Work Permit Conversion Scheme (Italy) – A pathway introduced under Italy's 2024 Budget Law allowing TP beneficiaries in regular employment to convert their temporary protection permit into a standard work-based residence permit.

SUMMARY

This Working Paper examines the transition from temporary protection to long-term residence for displaced Ukrainians in Poland and Italy, emphasising the legal, administrative, and humanitarian challenges anticipated by 2027. Although both countries have implemented national solutions, their models differ in design and accessibility, raising concerns about fairness, consistency and inclusion.

The paper pays particular attention to groups at risk of exclusion, including single mothers, informally employed individuals, elderly persons and unaccompanied minors. The analysis addresses both legal pathways and the digital, bureaucratic and practical barriers that may hinder eligible individuals from obtaining status.

In addition to outlining national frameworks, the report provides actionable recommendations for governments, non-governmental organisations and local authorities. Recommendations include enhancing digital capacity, streamlining permit procedures, monitoring outcomes, and strengthening outreach in high-pressure regions such as Mazowieckie and Lombardy.

The paper frames the conclusion of the TPD not merely as a legal expiration but as a test of institutional preparedness and political commitment. Ensuring continuity, dignity, and fairness throughout this transition will determine whether the EU's most unified humanitarian response in recent decades can become a sustainable path to inclusion.

“Behind every statistic are people – men, women, and children – whose stories deserve to be seen and heard.” This reminder from UNHCR should guide all actions between now and 2027 as the European Union prepares for the transition out of temporary protection.

1. INTRODUCTION

“Behind every statistic are people – men, women, and children – whose stories deserve to be seen and heard.”¹

This report analyses how Poland and Italy are preparing for the transition of TP beneficiaries after the EU legal regime ends in March 2027.² Introduced in 2022 for people fleeing Russia's invasion of Ukraine, TP granted collective residence and rights without individual asylum procedures.³ With no EU-wide exit strategy, Member States must design national mechanisms to prevent legal and humanitarian gaps.⁴

¹ UNHCR, *Global Trends: Forced Displacement in 2022* (UNHCR 2023) 4.

² 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 [2001] OJ L212/12.

³ Ibid.

⁴ Council Recommendation (EU) 2025/XXX on a coordinated transition out of temporary protection (27 September 2025, not yet published in OJ).

Poland's Special Act, amended in 2024, created a three-year bridging residence permit (*CUKR*) for long-term beneficiaries.⁵ Italy, by contrast, enables conversion of temporary protection permits into ordinary residence categories mainly for work, study or family reasons.⁶

The paper compares these models in terms of legal certainty, accessibility, and sustainability, and situates them within the EU's coordinated transition framework and debates on long-term residence.

2. EU TEMPORARY PROTECTION REGIME AND TRANSITION FRAMEWORK

The TPD⁷ provides the legal basis for granting immediate, collective protection to displaced persons in the event of a mass influx, without individual asylum procedures. On 4 March 2022, the Council of the EU unanimously activated the Directive⁸ for people fleeing Russia's invasion of Ukraine its first-ever use.

Initially valid for one year, temporary protection was extended several times, most recently in June 2025 until 4 March 2027, now regarded as the final expiry date unless conditions in Ukraine deteriorate further.⁹

To prepare for this deadline, the EU launched a coordinated transition process. In September 2025, the Council adopted a Recommendation on the Coordinated Transition out of Temporary Protection.¹⁰ Although non-binding, it provides a framework to prevent protection gaps and ensure consistent practice across Member States.

The Recommendation identifies four priorities:

- **Facilitating access to residence permits** – Member States should enable timely applications for national or EU residence permits such as for employment, study, or family reunification, well before the expiry of temporary protection.
- **Supporting voluntary return** – Assisted return and reintegration programs should remain available for at least one year beyond 2027, ensuring continued access to housing, healthcare and education during the reintegration process.
- **Safeguarding vulnerable groups** – Transitions must avoid abrupt loss of status. Children should be allowed to complete the school year, and persons with special needs should remain until safe return becomes possible.

⁵ Act of 12 March 2022 on Assistance to Citizens of Ukraine in Connection with the Armed Conflict on the Territory of that State (Journal of Laws 2022, item 583, as amended 2024).

⁶ AIDA/ECRE, *Country Report: Italy – 2024 Update* (2024) <https://asylumineurope.org>.

⁷ *Ibid.*, section 4.2.

⁸ Council Implementing Decision (EU) 2022/382 of 4 March 2022 establishing the existence of a mass influx of displaced persons from Ukraine [2022] OJ L71/1.

⁹ Council Implementing Decision (EU) 2025/1460 of 15 July 2025 extending the temporary protection introduced by Implementing Decision (EU) 2022/382 (OJ L 24.7.2025).

¹⁰ Council Recommendation of 16 September 2025 on a coordinated approach to the transition out of temporary protection for displaced persons from Ukraine, OJ C/2025/5129.

- **Ensuring information and counselling** – Early, multilingual guidance should be provided through so-called Unity Hubs, ideally co-funded by the EU, to help beneficiaries understand their options and prepare in advance.

3. COUNTRY ANALYSIS

3.1. Poland: National Legal Pathways Post-TPD

Poland hosts one of the largest numbers of displaced Ukrainians – around 1.5 million at the peak of the TPD regime. Its response is anchored in the Special Act of 12 March 2022, establishing a tailored national regime (“UKR” status in the PESEL register). As a temporary framework, the Act grants legal stay and access to work, healthcare, education, and social benefits. Repeated amendments, most recently extending validity to 30 September 2025 ensured continuity, but also created uncertainty.¹¹

The statuses available and their advantages and disadvantages are discussed below.

3.1.1 The CUKR Bridging Permit (2024 Amendment)

The June 2024 amendment introduced a three-year residence permit (CUKR) for Ukrainians who had held UKR status for at least one year by March 2024.¹² The advantages of the bridging status include:

- **Legal certainty:** Renewable national permit valid beyond 2027, aligning with the EU’s call for “bridging” mechanisms.
- **Accessibility:** Broad eligibility without income or language criteria; however, digital-only applications disadvantage the elderly and less digitally skilled.¹³
- **Implications:** Provides large-scale regularisation, reducing the risk of a “cliff-edge” in 2027.

3.1.2 Asylum (Refugee or Subsidiary Protection)

Ukrainians remain eligible for asylum. Recognition rates exceeded 80% in 2024 but are expected to decline if conditions in Ukraine stabilise.¹⁴

Pros: Durable status under EU law, renewable residence, and full rights.

Cons: Limited administrative capacity to manage applications; not a collective solution.

¹¹ Act of 12 March 2022 on Assistance to Citizens of Ukraine in Connection with the Armed Conflict on the Territory of that State (Journal of Laws 2022, item 583, as amended 2024).

¹² Act of 15 May 2024 amending the Act on Assistance to Citizens of Ukraine (Journal of Laws 2024, item 854).

¹³ Najwyższa Izba Kontroli, *Wystąpienie pokontrolne: P/23/003 – Działania wybranych organów administracji publicznej na rzecz pomocy obywatelom Ukrainy* (Delegatura w Krakowie, 4 October 2023) 13–14.

¹⁴ Urząd do Spraw Cudzoziemców (UDSC), *Zestawienia roczne – Dane liczbowe dotyczące postępowań prowadzonych wobec cudzoziemców w 2024 r.* <https://www.gov.pl/web/udsc/zestawienia-roczne> accessed 19 November 2025.

3.1.3 Work-Based Residence Permits

Many Ukrainians are employed and can transition to ordinary residence or Blue Card permits.

Pros: Provides long-term residence and citizenship prospects; Blue Card ensures stability.

Cons: Tied to formal employment; job loss or low income may prevent renewal.¹⁵

3.1.4 Study-Based Residence

Students enrolled in Polish universities may apply for annual study permits with limited work rights.

Pros: Facilitates youth integration into education and to some extent the labor market.

Cons: Short-term and financially restrictive; relevant to a only small group.

3.1.5 Family Reunification

Residence through family ties, marriage to Polish/EU citizens, or reunification with residents offers a stable route to permanence.¹⁶

Pros: Long-term, stable status.

Cons: It is limited to those with qualifying relatives; “ageing-out” minors turning 18 by 2027 will need new, independent permits.

3.1.6 Humanitarian and Tolerated Stay

Humanitarian and tolerated stay constitute residual legal statuses for individuals who cannot be returned to their country of origin, but who do not qualify for international protection. They offer minimal rights and no path to permanence; they are likely relevant only to exceptional cases.

Both tolerated and humanitarian stay could potentially be applicable to TPD beneficiaries or persons displaced from Ukraine who do not receive any other form of protection but cannot be returned (due to either individual circumstances, such as disability or medical issues, or danger to their life and safety in Ukraine).

Under Article 351 of the Law on Foreigners, tolerated stay allows a foreigner to reside legally when return is factually or legally impossible, yet the conditions for international protection are not met. While it prevents removal, tolerated stay provides limited rights and may place the individual in a more precarious situation than humanitarian residence, notably due to the absence of an automatic right to work and reduced prospects for long-term residence.

By contrast, Article 348 of the Law on Foreigners provides for a humanitarian stay, which is granted on exceptional humanitarian grounds, where enforcing the obligation to return would be contrary to the foreigner’s interests or human dignity. Humanitarian stay generally confers

¹⁵ European Council on Refugees and Exiles (ECRE), *AIDA Country Report: Poland – 2024 Update* (ECRE 2024) <https://asylumineurope.org>.

¹⁶ Ustawa z 12 grudnia 2013 r. o cudzoziemcach (Dz.U. 2023 poz. 519), arts 159–161, 169–175.

broader rights, including the right to work without a permit and improved possibilities for regularising and stabilising residence.

3.1.7 Assessment

Poland's approach combines integration for established residents with an expectation of eventual return for others. The CUKR permit and standard routes (work, family, study) enhance legal certainty and align with EU coordination. However, the gradual reduction of benefits (e.g. housing aid and social assistance) underscores the temporary nature of protection.¹⁷

By 2027, two trajectories are likely to emerge:

1. **A regularised majority** - stabilised through CUKR, then work or family permits.
2. **A vulnerable minority** - late arrivals or dependents at risk of exclusion or reliant on voluntary return.

Poland's model reflects the core tension of the EU transition process: building durable pathways for integration while maintaining the temporary logic of protection.

3.2. Italy National Legal Pathways after TPD

Italy hosts a significant number of displaced Ukrainians—approximately 170,000 at the peak of TP.¹⁸ Its response is based on a decree of 28 March 2022 implementing the EU TPD, granting residence through the *Permesso di Soggiorno per Protezione Temporanea*.¹⁹ This permit provides access to work, healthcare, education, and social benefits. While the framework was conceived as temporary, Italy has extended it multiple times most recently to 4 March 2026 delaying legal clarity for long-term stay.²⁰

3.2.1 The Work Permit Conversion (2024 Budget Law)

Italy has introduced the work permit conversion option specifically for TP holders, which offers a range of advantages.

- **Legal certainty:** The 2024 law enables TP holders in regular employment to convert their status into standard, renewable work permits beyond 2027 directly responding to EU recommendations.²¹
- **Accessibility:** Broadly accessible to those with formal jobs and without strict income or language requirements; however, it excludes the unemployed and informally employed.
- **Implications:** Offers large-scale regularisation for working refugees while highlighting the need for complementary solutions for those not in the labor market.

¹⁷ Ustawa z 12 marca 2022 r. o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa (Dz.U. 2024 poz. 823).

¹⁸ EUAA, *Ukraine Situation – Weekly Report*, various issues 2022–2024.

¹⁹ Decreto del Presidente del Consiglio dei Ministri 29 marzo 2022, Gazzetta Ufficiale n 89 (15 April 2022).

²⁰ Italian Ministry of the Interior, *Circolare* (5 March 2024).

²¹ Legge 30 dicembre 2023, n 213 (Legge di Bilancio 2024), art 7.

3.2.2 Asylum (Refugee or Subsidiary Protection)

Pros: Offers a secure, long-term status with full rights, independent of the war's duration.²²

Cons: Slow and complex procedures mean it cannot realistically absorb large numbers of TP beneficiaries.²³

3.2.3 Work-Based Residence Permits

Pros: Provide a stable legal pathway and, in some cases, access to long-term residence or citizenship²⁴; Blue Card options support skilled workers.²⁵

Cons: Status depends on continuous employment, which can be risky for those in unstable or low-paid jobs.

3.2.4 Study-Based Residence

Pros: Supports integration through education and opens future opportunities in skilled employment.²⁶

Cons: Limited to those who can meet admission and financial requirements, restricting overall accessibility.

3.2.5 Family Reunification

Pros: One of the most reliable long-term options for beneficiaries with close family in Italy or the EU.

Cons: Limited to eligible relatives; ageing-out minors must secure new adult permits.²⁷

3.2.6 Humanitarian (Special) Protection

Pros: Provides a safety net for individuals with specific vulnerabilities.

Cons: Granted case-by-case and does not offer a clear long-term perspective.²⁸

3.2.7 Assessment

Italy's model prioritises integration through labor-market participation and formal legal channels, especially the work permit conversion scheme.²⁹ These tools support transition for

²² Directive 2011/95/EU (Qualification Directive), implemented in Italy by Legislative Decree 251/2007.

²³ Directive 2013/32/EU (Asylum Procedures Directive), implemented in Italy by Legislative Decree 25/2008.

²⁴ Legislative Decree 286/1998 (Testo Unico sull'Immigrazione), arts 22–26.

²⁵ Directive 2009/50/EC on the EU Blue Card [2009] OJ L155/17.

²⁶ Legislative Decree 68/2007 (study residence permits).

²⁷ Legislative Decree 286/1998, arts 28–30 (family reunification).

²⁸ Legislative Decree 286/1998, art 19(1.1) (special protection).

Hg=8²⁹ AIDA/ECRE, *Country Report: Italy – 2024 Update* (2024) sections on access to residence permits, labour-market integration and vulnerable groups.

many, but leave others, particularly non-working or vulnerable individuals, exposed to future uncertainty. Despite continued existence in law of humanitarian protection status, eligibility has been significantly restricted since 2018.

By 2027, two main groups are expected:

1. **A regularised majority**, primarily through work-based or family permits.
2. **A vulnerable minority**, including those without employment or support, relies on residual or ad hoc measures.

Italy illustrates the EU-wide dilemma: advancing long-term inclusion while reaffirming the temporality of protection. It leans on individual initiative and economic activity, but must address remaining gaps to avoid exclusion at scale.

4. COMPARATIVE OUTLOOK

The success of the post-TP transition will be measured by how well those least able to regularise are treated. If integration succeeds only for the economically active, the EU's humanitarian achievement will erode. Poland and Italy possess the legal tools, humanitarian permits, discretionary extensions and voluntary return programs, but must apply them transparently. Continued EU funding and oversight will be essential to prevent new protection gaps and uphold the Directive's objectives.

Poland and Italy exemplify two contrasting models of transition after the TPD. Poland adopted a protection-based framework through the CUKR bridging permit, enabling large-scale regularisation via a dedicated national mechanism. Italy pursued a labor-centered strategy, integrating beneficiaries individually through existing migration channels. Poland's model offers inclusivity and legal continuity but depends on sustained administrative capacity. Italy's approach promotes self-reliance and economic participation, yet risks excluding those unable to meet formal or labor-market criteria. Together, these cases highlight divergent national interpretations of the EU's coordinated transition strategy and the need for continued EU oversight to ensure fairness, consistency, and to prevent new protection gaps after March 2027.

The table below provides a comparative summary of the statuses and rights attached to them for the two countries.

Table 1. Post-TP legal pathways in Poland and Italy across core migration categories

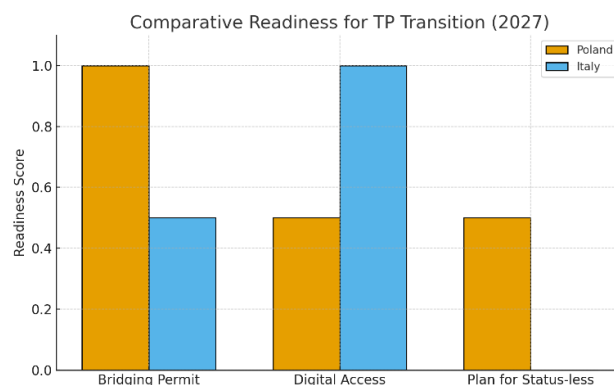
Legal Pathway	Poland (after Temporary Protection ends)	Italy (after Temporary Protection ends)
Dedicated post-TP permit	CUKR 3-year permit (Special Act 2024). Inclusive and stable status for those registered by March 2024. No income/language test. Later arrivals excluded.	No dedicated scheme. TP permit must be converted into existing categories (e.g. work, study).
Asylum (refugee/ subsidiary protection)	Available; high recognition rate (~82% in 2024). Long-term residence for individuals with specific risks.	Available but rarely used. Durable status, but limited eligibility post-TP.
Humanitarian / special protection	Tolerated stay possible case-by-case (e.g. medical grounds). Minimal rights; not a long-term solution.	<i>Protezione speciale</i> (2 years); restricted to family life or non-refoulement cases. Other humanitarian permits exist but are rare.
Work-based residence	Standard work or EU Blue Card permit. Job / income required. Path to long-term residence.	TP → <i>permesso di lavoro</i> . Renewable 2-year permit. Grants work/family rights. Counts toward LTR.
Study-based residence	Student permit for enrolled Ukrainians. Renewable; part-time work allowed.	<i>Permesso per studio</i> (1 year). Convertible to work permit post-graduation.
Family residence	Spouses of Polish / EU citizens eligible. Reunification possible under certain criteria.	Marriage / family reunification with income/housing conditions. Grants 5-year residence card.
Long-term residence / citizenship	LTR after 5 years on eligible permits (TP years excluded). Citizenship after 10 years.	Same rules. Citizenship after 10 years or 2 if married to Italian. Pending EU reform may change LTR eligibility.
Voluntary return and reintegration	IOM / EU-assisted return expected in 2027+. Protection from removal for families and vulnerable persons.	IOM / EU return schemes in place. 1-year grace period likely after TP ends.

Source: Author's compilation based on national legislation, AIDA/ECRE reports, and Council of the EU documents.

To complement the legal comparison, Figure 1 visualises the operational readiness of Poland and Italy across three indicators: existence of a bridging permit, accessibility of digital systems, and inclusion of undocumented groups.

Scores (0–1) reflect preparedness levels: 1 = entirely in place; 0.5 = partial; 0 = absent. Poland scores highest on bridging permits (CUKR), while Italy leads in digital accessibility. Neither country has a dedicated framework for undocumented groups.

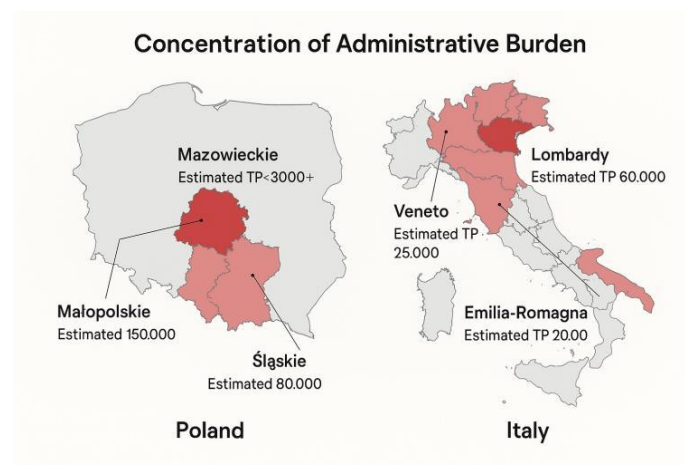
Figure 1. Comparative readiness of Poland and Italy across three operational indicators.



Source: Author's assessment based on national law and NGO reports.

To visualise where administrative strain is likely to be greatest, Figure 2 highlights the regions in Poland and Italy that host the highest numbers of Ukrainian beneficiaries and will require intensified coordination and staffing during the post-TP transition. The map illustrates the regions expected to face the highest administrative burden during the post-TP transition. Areas such as Mazowieckie, Małopolskie, and Śląskie in Poland, and Lombardy, Veneto, and Emilia-Romagna in Italy, host the largest Ukrainian populations and are likely to see the highest volume of residence permit conversions.

Figure 2. Regional Administrative Pressure Points in Poland and Italy.



Source: Author's compilation based on national statistics, NGO reports, and regional estimates.

5. RISK OF EXCLUSION AND VULNERABLE GROUPS

While legal pathways exist for many, a considerable share of Ukrainian beneficiaries risk exclusion once TP expires in March 2027.³⁰ The shift from collective protection to individual permits favors those who meet formal criteria for employment, education, or family ties while disadvantaging vulnerable and marginalised groups. Without targeted safeguards, these populations may become irregular, undermining the humanitarian objectives of the TPD.

5.1. Low-Income and Precariously Employed Refugees

Those without stable, formal work are least likely to qualify for post-TP residence. Both Poland and Italy require documented employment and sufficient income for work permits. Informal workers, especially women in domestic or seasonal sectors, may fail to meet these standards or lack employer sponsorship. As TP ends, they risk losing legal stay and being pushed into irregular employment, exposing them to exploitation.

5.2. Primary Caregivers and Single Mothers

A large share of displaced Ukrainians are women caring for young children, often without partners. Many rely on part-time or informal jobs incompatible with work permit criteria. The gradual withdrawal of support schemes such as Poland's housing stipends in 2024 exacerbates their vulnerability. Although the Council Recommendation encourages flexibility for families with children, these measures remain temporary. Without structural solutions, single-parent households may fall into poverty or irregularity.

5.3. Elderly Persons and Individuals with Disabilities

Older refugees and those with disabilities face parallel challenges. They are typically ineligible for work or study permits, while family reunification depends on strict income and dependency requirements. Poland's tolerated stay and Italy's *permesso per cure mediche* offer limited relief but require complex documentation and administrative discretion. For chronic or lifelong conditions, temporary permits are insufficient to ensure continuity of care.

5.4. Unaccompanied Minors and Youth Turning 18

Unaccompanied minors protected under TP will reach adulthood by 2027 and must secure a new status. Some may transition to study permits or asylum; others, in Italy, can apply for a *permesso per integrazione dei minori* (ages 18–21).³¹ Poland addresses such cases individually many risk exclusions at the point of majority without proactive guidance and case management.

³⁰ Council Implementing Decision (EU) 2025/945 of 20 June 2025 extending temporary protection until 4 March 2027 [2025] OJ L159/25.

³¹ *Ministerial Circular No 400/A/2018/1* (Italy) on residence permits for former care wards; *Polish Office for Foreigners, Guidelines on the Residence of Ukrainian Minors Turning 18* (2024).

5.5. Unregistered or Deregistered Individuals

Some Ukrainians missed registration or lost TP through prolonged absence (e.g. over 30 days abroad in Poland).³² Limited corrective measures exist, and those still unregistered by 2027 will have no lawful status. Digital illiteracy, rural isolation and complex renewal procedures, especially Poland's online-only CUKR process, may further disadvantage elderly or less-educated refugees.

5.6. Structural and Political Factors

The EU's coordinated approach mitigates but cannot eliminate these risks. The Council Recommendation urges flexibility for vulnerable groups and continued support until safe return becomes feasible.³³ Implementation, however, depends on national politics and administrative capacity. Poland's post-2023 government has shown greater openness to protection, while Italy's restrictive migration stance may narrow discretion once the war ends.

Digital exclusion compounds these vulnerabilities: refugees unable to navigate online systems risk irregularity through no fault of their own. The consequences of loss of work rights, housing, and healthcare are severe, with women particularly vulnerable to labour or sexual exploitation.³⁴

5.7. Inclusive Transition or Missed Opportunity?

The credibility of the post-TPD transition will ultimately rest on how states treat those least able to navigate formal pathways. If only the economically active succeed, the EU risks undermining the inclusive spirit of the TPD. Both Poland and Italy have the legal frameworks and policy tools to ensure no one is left behind, but these must be applied consistently, transparently, and with adequate resources. Without clear safeguards and continued EU support, vulnerable individuals may slip into irregularity, reversing years of a humanitarian approach.

6. CONCLUSIONS AND POLICY RECOMMENDATIONS

The expiry of the EU's TPD regime in March 2027 will test whether Europe can transform emergency solidarity into durable inclusion. Poland and Italy exemplify two contrasting but complementary models of transition. Poland's protection-based approach institutionalises large-scale regularisation through the CUKR permit, ensuring predictability and administrative continuity. Italy's labour-driven model channels integration through existing migration

³² *Polish Act of 12 March 2022 on Assistance to Citizens of Ukraine in Connection with the Armed Conflict on the Territory of that State* (as amended June 2024) art 11(2); ECRE, *Poland Country Report* (2024).

³³ Council Recommendation on a Coordinated Transition out of Temporary Protection (adopted 18 September 2025).

³⁴ European Commission, *EU Strategy on Combatting Trafficking in Human Beings 2021–2025* COM (2021) 171 final.

categories, rewarding employment and individual initiative. Both frameworks aim to prevent protection gaps but risk leaving the most vulnerable behind.³⁵

To ensure a humane and orderly transition, seven interlinked policy priorities emerge.

6.1. Policy Priorities

➤ *Strengthen information and counselling*

Governments, supported by the EU and civil society, must intensify multilingual information campaigns well before 2027. Many legal pathways, such as work, study, or family residence, require months of preparation. Clear, verified guidance should be disseminated through online portals, schools, local offices, and NGOs. The Council's proposed Unity Hubs should serve as one-stop advisory centers within regional CUKR offices in Poland and municipal integration centers or *Questure* in Italy.³⁶ Expected outcome include: greater awareness, timely applications, and reduced accidental irregularity.

➤ *Simplify administrative procedures*

Bureaucratic overload remains one of the greatest risks to continuity. Both countries should allocate sufficient resources to ensure the timely processing of residence applications, including:

- additional staffing and extended office hours;
- simplified documentation and deadlines;
- reduced or waived first-time permit fees; and
- paper or in-person options for the digitally excluded.³⁷

Digital pre-screening or group information sessions in Italy could streamline conversions; in Poland, regional helpdesks should support CUKR applicants.

➤ *Maintain flexibility for vulnerable groups*

A linear transition is unrealistic. Authorities should introduce transitional or humanitarian permits for those unable to meet ordinary criteria.

Possible measures include:

- a short-term (6–12-month) bridging permit for individuals seeking work, study, or training;
- a one-year grace period post-TP expiry, maintaining legal stay and service access; and
- continued humanitarian discretion for elderly, disabled, or single-parent households.³⁸

These steps may require minor legal updates in each country and should receive EU funding to ensure consistent procedures.

³⁵ Council Implementing Decision (EU) 2025/945 of 20 June 2025 extending temporary protection until 4 March 2027 [2025] OJ L159/25.

³⁶ Council Recommendation on a Coordinated Transition out of Temporary Protection (adopted 18 September 2025).

³⁷ ECRE, *AIDA Country Report: Poland – 2024 Update* (2024); AIDA/ECRE, *Country Report: Italy – 2024 Update* (2024).

³⁸ Council of the EU, *Recommendation on a Coordinated Approach to the Transition out of Temporary Protection* (18 September 2025) para 22; AIDA/ECRE, *Poland: Special Reception Needs of Vulnerable Groups* (2024); AIDA/ECRE, *Italy: Identification- Guarantees for Vulnerable Groups* (2024).

➤ *The transition should remain a shared European responsibility*

The European Commission and the EUAA should issue best-practice guidance and coordinate monitoring of national approaches. Continued funding via the Asylum, Migration and Integration Fund (AMIF) is vital to sustain administrative capacity and integration programs.³⁹

Adopting the recast Long-Term Residence Directive, which counts TP years toward eligibility, would offer thousands of Ukrainians a harmonised and dignified long-term solution. Coordination with the Government of Ukraine will be crucial to ensure safe, voluntary, and supported return pathways.

➤ *Promote self-reliance and integration before 2027*

Policies should prioritise employability and social participation. Poland can expand language and credential-recognition schemes, while Italy should incentivise formal employment through simplified hiring and targeted subsidies. Childcare support and job-training opportunities would help women access stable jobs.

➤ *Monitor, evaluate, and adjust*

Governments should closely track permit uptake during 2026 to identify gaps and demographic disparities. If too few refugees secure legal residence, the criteria should be adjusted, and outreach strengthened. The EU's joint database for tracking status transitions should enable data-driven policy adjustments and mutual learning among Member States.⁴⁰

➤ *Guarantee continuity of essential services*

Access to healthcare, education and housing must remain uninterrupted during status conversion or voluntary return. Individuals awaiting new permits should retain legal access through interim documentation. Clear instructions to regional authorities are needed to prevent confusion as seen in Italy's 2024 renewal delays noted in the AIDA report.⁴¹

6.2. Measuring Success: Indicators for 2027 and Beyond

As the EU's temporary protection framework nears its 2027 expiry, success should be measured not just by legal reforms but by lived outcomes. An effective monitoring strategy should therefore look at four areas of progress, outlined below.

➤ *Conversion to stable legal status*

The share of TP beneficiaries who successfully obtain new residence permits (e.g. work visas, study or family-based permits) reflects how accessible and functional these pathways are. In Italy, uptake of the 2024 work permit conversion scheme could be measured by:

- number of applications submitted and approved;
- renewal rates over time; and
- transition from temporary to indefinite permits.

³⁹ European Commission, *Asylum, Migration and Integration Fund (AMIF) 2021–2027 Framework COM (2021) 690 final*.

⁴⁰ EU Asylum Agency (EUAA), *Operational Plan for Post-TP Transitions (2025)*.

⁴¹ AIDA/ECRE, *Country Report: Italy – 2024 Update (2024)*, section on administrative delays.

In Poland, the effectiveness of the CUKR scheme will depend on whether a large portion of eligible UKR-status holders apply for and receive the bridging permit. If significant numbers fail to transition, this may signal procedural or informational gaps.

➤ *Retention of legal status*

Beyond new permits, monitoring how many beneficiaries fall out of legal stay is critical. This includes:

- individuals who lose status through non-renewal or missed deadlines;
- errors in digital systems (e.g., online-only CUKR applications); and
- those excluded due to travel rules or deregistration.

NGOs report cases in which Ukrainians in Poland lost access to benefits due to administrative missteps, including the loss of a UKR certificate. These “silent exclusions” are not always recorded but can have serious consequences, including loss of healthcare or work rights.

➤ *Continuity of services*

Service access such as education, healthcare and housing support should remain intact throughout the transition. Tracking coverage rates before and after TP expiry will indicate whether individuals maintain access to essential services as they shift legal status. Particular focus should be placed on:

- children in schools;
- access to national health systems; and
- continuity of housing subsidies or municipal support.

➤ *Equity across demographic groups*

Outcome data should be disaggregated by gender, age, disability, ethnicity, and legal history. Refugee advocates warn that transitions heavily reliant on employment pathways risk marginalising:

- single mothers without stable jobs;
- Roma and stateless Ukrainians facing discrimination; and
- persons with chronic illnesses or disabilities.

A fair and effective transition should reduce, not deepen, existing inequalities. Disparities in permit issuance or benefit access would signal the need for corrective policies.

6.3. Operational Implications for Local Actors

As the end of temporary protection approaches, frontline actors – particularly NGOs, municipalities, and local service providers – will play a decisive role in shaping outcomes. Based on available evidence and field reporting, several operational priorities emerge, outlined in the sections below.

➤ *Priority groups requiring targeted support*

The following groups required tailored support from local actors:

- Single parent households, especially those with young children, may not meet work-related criteria and face declining support (e.g. in Poland, reduced housing stipends post-2024).

- Elderly persons and people with disabilities face systemic exclusion from employment-based transitions. They will require tailored case management and flexible pathways.
- Unregistered or precariously employed individuals, particularly in seasonal or informal jobs, are unlikely to qualify under standard procedures. Outreach to these populations is critical.

➤ *Competencies needed in 2026–2027*

The following capacities will be particularly important to ensure a smooth transition.

- Legal counselling and documentation support: To assist in navigating national permit systems (e.g. online CUKR in Poland, *Questura* procedures in Italy).
- Digital mediation: Training and assistance in using online platforms will be essential, especially for older or digitally excluded groups.
- Translation and community engagement: Multilingual staff and culturally competent outreach workers will help close the information gap, especially in rural or under-resourced areas.

➤ *Institutional pressure points*

The following pressure points should be noted.

- In Poland, regions with the highest concentration of TP holders (notably Mazowieckie and Małopolskie) will experience the highest administrative burden. Coordination between regional CUKR offices and social service providers will be essential.
- In Italy, pressure will fall unevenly due to the decentralised system. Northern regions such as Lombardy, Veneto and Emilia-Romagna, which host large Ukrainian populations, will likely face a surge in conversion applications. These regions also vary in the availability of local integration services and may require targeted funding.

➤ *Strategic roles for external actors*

External actors have a role to play, however this should involve complementing rather than supplanting local actors.

- NGOs should coordinate case tracking, legal clinics, and mobile outreach teams, especially in remote areas or communities with low permit uptake.
- Municipalities will need support to scale administrative capacity and prevent regional inequality in status transition.
- EU agencies and international donors can stabilise national efforts by:
 - funding Unity Hubs and one-stop support centers,
 - providing grants for digital literacy and legal aid,
 - conducting comparative monitoring of access and outcomes.

Ultimately, these operational implications underscore that legal frameworks alone are not enough. Only through early planning, capacity-building, and inclusive service delivery can national systems avoid an administrative bottleneck and a humanitarian rollback in 2027.

6.4. Final Reflections

The end of temporary protection in 2027 is not only a legal deadline but a test of Europe's capacity to combine solidarity with practical solutions. If managed well, the transition can produce balanced outcomes:

- stable residence and integration for those who remain, and
- voluntary, supported return for those who choose to go back.

Experiences in Poland and Italy demonstrate that legal certainty must be paired with human flexibility. Behind every permit is an individual or family, and overly rigid approaches risk leaving the most vulnerable behind.

The 2022 activation of the TPD was the EU's most unified humanitarian action in decades. Its conclusion will reveal whether that unity can evolve into sustainable inclusion. Member States can turn the 2027 transition into a managed process rather than a humanitarian setback by strengthening outreach, simplifying procedures, and maintaining flexibility for at-risk groups.

As the Council of the EU affirmed, “a coordinated approach to the transition out of temporary protection is in the best interest of those who had to leave their country.”⁴² That principle should guide all actions between now and 2027.

⁴² Council of the EU, *Press Release* (18 September 2025).

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ecre

European Council
on Refugees and Exiles

European Council on Refugees and Exiles

Avenue des Arts 7/8

Brussels 1210

Belgium

T.+32 232 900 40

ecre@ecre.org

www.ecre.org