



ASSEDEL, 11 Rue de Bruxelles
67000 Strasbourg, France, www.assedel.org, info@assedel.org

Legal background and practical consequences of the €100 fee for the Renewal of Temporary Protection in France

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Since 1 May 2026, France has introduced a €100 tax for the second and subsequent renewals of the temporary residence permit (autorisation provisoire de séjour, APS) issued to beneficiaries of temporary protection. Although the first issuance and the first renewal remain exempt, the new fee raises significant questions concerning its compatibility with Directive 2001/55/EC, the principles of effectiveness and proportionality under EU law, and fundamental rights protected by the Charter of Fundamental Rights of the European Union.

The stated objective of the reform is to cover part of administrative costs associated with repeated renewals.

This article examines the legal basis of the measure, evaluates its compatibility with European law and analyses the potential consequences for administrative practice and judicial review.

It argues that proportionality under Directive 2001/55/EC cannot be assessed solely by reference to the amount of the administrative fee. Proportionality has to be evaluated in light of the humanitarian objectives of temporary protection, the cumulative effect of repeated renewals and the economic vulnerability of beneficiaries.

A report by Marharyta Podolska

Introduction

Temporary protection was designed as an emergency humanitarian mechanism intended to provide immediate and simplified access to residence rights for persons fleeing armed conflict.

Since the activation of the Temporary Protection Directive in March 2022 for persons displaced from Ukraine, Member States have repeatedly renewed temporary residence documents with minimal administrative burdens.

France has recently departed from this approach by introducing a €100 tax applicable from the third renewal of the APS issued to beneficiaries of temporary protection. While formally enacted through the Finance Act for 2026, the measure raises broader constitutional questions because the beneficiaries concerned are individuals whose residence is not voluntary but derives directly from an EU humanitarian protection regime.

Temporary protection is not designed to regulate migration flows or grant long-term immigration status. Rather, it constitutes an emergency humanitarian mechanism intended to ensure immediate protection for displaced people until safe return becomes possible. Administrative requirements that may be acceptable in the context of ordinary migration cannot therefore automatically be applied to temporary protection without regard to the specific objectives pursued by Directive 2001/55/EC.

This article argues that although Member States retain competence to levy administrative fees, this discretion is constrained by EU law whenever such fees risk undermining the effectiveness of rights conferred by Union legislation.

2. Legislative Background

Article 128 of the French Finance Act for 2026 amended The Code of Entry and Residence of Foreigners and of the Right to Asylum (CESEDA) by introducing a €100 tax for both the issuance and renewal of provisional residence permits (APS)¹. Beneficiaries of temporary protection remain exempt only for the initial issuance and the first renewal. From the second renewal onwards, payment of the tax becomes mandatory.

The Ministry of Interior and several prefectures have confirmed that, for beneficiaries of temporary protection, the fee applies starting from the third APS issued.

¹ Article 128 - loi n° 2026-103 du 19 février 2026 de finances pour 2026 (1) - légifrance. (n.d.). https://www.legifrance.gouv.fr/jorf/article_jo/JORFARTI000053508916 « III. - La délivrance et le renouvellement d'une autorisation provisoire de séjour donnent lieu à la perception d'une taxe dont le montant est fixé à 100 euros».

2.1 Comparative Approaches in Member States

Although Directive 2001/55/EC leaves Member States discretion regarding the administrative arrangements governing residence documentation, available national practice reveals that most Member States have not introduced recurring administrative fees for the renewal of temporary protection. In several Member States, including Germany² and Spain³, the renewal of residence documents issued under temporary protection is carried out without payment of recurring administrative charges. While these national approaches do not determine the legality of the French measures, they suggest that the administrative objectives pursued by France may be achieved through less restrictive means, either by eliminating repeated renewal procedures altogether or by imposing considerably lower charges.

3. The Legal Framework of Temporary Protection

Directive 2001/55/EC establishes temporary protection as an exceptional humanitarian mechanism intended to provide immediate protection in situations of mass displacement.

Unlike ordinary immigration schemes, temporary protection is not based upon an individual application seeking admission but upon an implementing decision adopted by the Council of the European Union. Beneficiaries therefore enjoy residence rights derived directly from Union law rather than from national discretion.

The Directive pursues several objectives:

- immediate access to legal residence;
- rapid administrative procedures;
- avoidance of unnecessary administrative obstacles;
- fair sharing of responsibility among Member States.

These objectives mean that administrative formalities should facilitate, rather than hinder, the continued enjoyment of rights conferred by Directive 2001/55/EC. Since temporary protection is designed as an emergency humanitarian regime characterised by rapid and simplified procedures, administrative requirements should not introduce unnecessary obstacles capable of delaying or discouraging the continued exercise of those rights.

² Federal Ministry of the Interior and Community (Germany). Registration, residence permit and asylum. (n.d.). Germany for Ukraine. https://www.germany4ukraine.de/EN/einreise-aufenthalt-und-rueckkehr/ukraine-aufenthaltserlaubnis/seite_node

³ BOE-A-2026-3712 Orden INT/96/2026, de 12 de febrero, por la que se prorroga la validez de las tarjetas de identidad de extranjero expedidas a las personas afectadas por el conflicto en Ucrania beneficiarias de protección temporal. (n.d.). https://www.boe.es/diario_boe/txt.php?id=BOE-A-2026-3712

4. Competence of Member States to Levy Administrative Fees

Neither Directive 2001/55/EC⁴ nor the Council Implementing Decisions expressly prohibit Member States from charging administrative fees for residence documentation. Consequently, France retains regulatory autonomy regarding administrative charges. However, according to settled case law of the Court of Justice of the European Union, national procedural autonomy is limited by two general principles: equivalence and effectiveness.

The limits of Member State's procedural autonomy were first established by the Court of Justice in **Rewe-Zentralfinanz** (Case 33/76)⁵. The Court held that, in the absence of harmonised procedural rules, Member States remain competent to regulate the procedural conditions governing the enforcement of rights derived from Union law, taking into account the principles of equivalence and effectiveness⁶.

Further, in **European Commission v. Kingdom of the Netherlands** (Case C-508/10), the Court held that «the level at which those charges are set must not have either the object or the effect of creating an obstacle» to the acquisition of the legal status conferred by the relevant Directive⁷. The Court emphasised that charges having a significant financial impact may prevent individuals from exercising rights derived from EU law⁸ and that excessive administrative charges can undermine both the objective and the effectiveness of the Directive, otherwise both the objective and the spirit of that directive would be undermined⁹.

Although **Commission v. Netherlands** concerned residence permits issued under Directive 2003/109/EC, rather than temporary protection under Directive 2001/55/EC, the Court's reasoning was not limited to the specific legislative instrument at issue. Instead, the Court set out a more general principle,

⁴ European Union: Council of the European Union, 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, OJ L.212/12-212/23; 7.8.2001, 2001/55/EC, 7 August 2001, <https://www.refworld.org/legal/reglegislation/council/2001/17729> [accessed 17 July 2026]

⁵ **Rewe-Zentralfinanz eG and Rewe-Zentral AG v Landwirtschaftskammer für das Saarland**, Case 33-76, ECLI:EU:C:1976:188, Reference for a preliminary ruling: Bundesverwaltungsgericht - Germany, 16 December 1976.

⁶ *Ibid*, para 5.

⁷ **European Commission v. The Netherlands**, C-508/10, ECLI:EU:C:2012:243, European Union: Court of Justice of the European Union (CJEU), 26 April 2012, <https://www.refworld.org/jurisprudence/caselaw/ecj/2012/121871> [accessed 16 July 2026] para. 69

⁸ *Ibid*, para. 70

⁹ *Ibid*, para 69.

according to which administrative charges imposed in connection with residence rights derived from the European Union law must not be intended to undermine the practical effectiveness of these rights.

The Court further clarified in **Peterbroeck** (Case C-312/93) that «each case which raises the question whether a national procedural provision renders application of Community law impossible or excessively difficult must be analysed by reference to the role of that provision in the procedure, its progress and its special features, viewed as a whole, before the various national instances»¹⁰.

Applied to the current context, this requires assessment not only of the existing €100 fee, but also of its practical application within the framework of the general temporary protection system. Relevant considerations include the frequency of renewals, the financial situation of the beneficiaries, the humanitarian objectives pursued by Directive 2001/55/EC and the cumulative effect of repeated administrative fees.

The central legal question is therefore not whether France may charge a fee, but whether the amount and operation of the fee interfere disproportionately with rights guaranteed by Union law.

5. Compatibility with the Principle of Effectiveness

The effectiveness principle occupies a central place in EU administrative legislation.

Beneficiaries of temporary protection are often persons with limited financial resources who cannot safely return to their country of origin and whose integration into labour market remains uneven.

A mandatory €100 payment every six months may therefore generate several practical consequences, notably an increase in administrative disputes and financial barriers that result in unequal access to protection among beneficiaries.

Where payment becomes a practical obstacle to maintaining legal residence, the fee risks undermining the effectiveness of the protection guaranteed by the Directive 2001/55/EC.

Failure to renew the APS because of non-payment does not merely affect the possession of an administrative document. Renewal constitutes the legal precondition for the continued exercise of numerous rights guaranteed under Directive 2001/55/EC and national law. Consequently, the payment of an administrative fee may indirectly affect continued access to employment, social assistance, healthcare, accommodation, banking services and other rights that depend upon the maintenance of lawful residence.

Rights granted under the Union framework must remain practically exercisable and effective, rather than being merely theoretical or illusory. Even if individuals enjoying temporary protection formally retain the right to have their residence documents renewed, recurring financial obligations may diminish the practical accessibility of these rights for economically vulnerable individuals.

¹⁰ Peterbroeck, Van Campenhout & Cie SCS v Belgian State. Reference for a preliminary ruling: Cour d'appel de Bruxelles - Belgium. Power of a national court to consider of its own motion: the question whether national law is compatible with Community law, C-312/93. ECLI:EU:C:1995:437, Judgment of the Court of 14 December 1995.

Consequently, administrative measures affecting the renewal of residence permits may have consequences extending beyond the reimbursement of administrative costs. The assessment of effectiveness should focus not only on the formal availability of renewal procedures but also on whether the conditions attached to renewal allow beneficiaries to continue enjoying, in practice, the rights granted by Directive 2001/55/EC.

Unlike ordinary residence permits, temporary protection exists primarily for humanitarian purpose rather than migration management. Administrative costs imposed upon beneficiaries therefore require particularly careful proportionality review.

6. Proportionality Analysis

Under EU law, the exercise of national competence must comply with the general principles of Union law whenever Member States implement or give effect to EU legislation.

The principle of proportionality, enshrined in Article 5(4) TEU, requires that measures adopted by public authorities must not exceed what is necessary to achieve their legitimate objectives¹¹. When Member States implement Union law, they are also required to comply with Article 52(1) of the Charter of Fundamental Rights of the European Union, according to which any limitation on the exercise of rights guaranteed by the Charter must be provided by law, respect the essence of those rights and comply with the principle of proportionality¹². More precisely, these limitations may be introduced only if they are necessary and genuinely meet objectives of general interest recognised by the Union or the need to protect the rights and freedoms of others. These constitutional requirements have consistently been applied by the Court of Justice when assessing national measures capable of restricting rights derived from EU law.

National measures must therefore pursue a legitimate aim, be necessary in the absence of less restrictive alternatives and avoid imposing disproportionate burdens on the individuals concerned.

According to the settled case-law of the Court of Justice of the European Union, proportionality requires that a national measure pursue a legitimate aim, be suitable for achieving this aim, be necessary in the sense that no less restrictive measure would achieve the same result and would not impose a disproportionate burden on the persons concerned.

First, the measure must pursue a legitimate aim. The measure introduced by France pursues a legitimate aim, namely the partial reimbursement of the administrative costs incurred by the authorities in processing the renewals of residence permits.

¹¹ Consolidated version of the Treaty on the Functioning of the European Union, OJ L. 326/47-326/390; 26.10.2012, European Union (EU), 26 October 2012, <https://www.refworld.org/legal/agreements/eu/2012/122600> [accessed 16 July 2026]

¹² European Parliament, Council of the European Union, & European Commission. (2000). CHARTER OF FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION. In Official Journal of the European Communities (p. C 364/1-C 364/8) https://www.europarl.europa.eu/charter/pdf/text_en.pdf

Neither the legislative text nor any publicly available legislative materials explain how the amount of €100 was determined, nor is there any evidence that it corresponds to the administrative costs associated with renewing an APS.

Although the legislation sets the amount of the fee, it contains no indication of the methodology used to calculate it, nor any assessment that would link it to the actual costs of processing renewal applications. In the absence of such justification, it is difficult to determine whether the fee genuinely reflects the objective of cost recovery or instead imposes a disproportionate financial burden on beneficiaries of temporary protection.

This lack of justification is of a particular significance in light of the principle of proportionality enshrined in the EU law. Administrative fees must be reasonably related to the costs of processing the relevant application and must not serve as a source of revenue or as a means of hindering the exercise of rights conferred by European Union law.

Although the French Government has not publicly demonstrated that the renewal of an APS generates administrative costs approaching €100 per applicant, the renewal procedure itself is largely administrative in nature, consisting primarily of verifying continued eligibility and issuing a renewed document.

Since there is no evidence demonstrating that the amount reflects the real administrative costs incurred, legitimate questions arise as to whether the fee exceeds what is necessary to recouvre these costs and instead creates an additional financial burden capable of undermining the effectiveness of the rights guaranteed by Directive 2001/55/EC.

Secondly, the measure must be suitable for achieving this aim. A renewal fee is capable of generating revenue contributions to administrative expenditure and therefore appears suitable for achieving the objective in question.

Thirdly, the measure must be necessary. At this stage, the question arises whether the same objective could have been achieved through less restrictive measures.

Possible alternatives include:

- Reduced Administrative Charges
- Exemptions for economically vulnerable beneficiaries
- Income-based reductions
- Payment deferral mechanisms
- Possible reimbursement schemes.

The absence of any publicly available assessment explaining why these alternatives were not adopted may become relevant in any future proportionality review.

Finally, proportionality *stricto sensu* requires balancing the public interest pursued against the burden imposed upon the individuals concerned.

Even if the measure pursues a legitimate aim and is both suitable and necessary, it must strike a fair balance between the public interest pursued and the rights of the individuals affected. In the present context, a periodic renewal fee of €100 may constitute a relatively small administrative fee for some beneficiaries, while being a significant financial burden for others with very limited resources. For example, a beneficiary with a monthly income of €300 would have to devote one-third of their monthly resources to the renewal fee, whereas for a beneficiary with a monthly income of €1,477¹³ the same fee would represent only 6.8% of their monthly income. Although the fee is formally identical, its practical consequences differ considerably depending on the individual financial situation.

Accordingly, the assessment of proportionality must take into account not only the amount of the fee, but also its cumulative effect over time.

If France relies upon the recovery of administrative costs as the legitimate aim of the measure, it should demonstrate that the amount of the fee collected reasonably reflects the costs and that less restrictive measures would not achieve the same aim. In the absence of any publicly available impact assessment or legislative explanation addressing these issues, it becomes more difficult to establish the proportionality of the measure in question.

Unlike ordinary migrants, beneficiaries of temporary protection constitute a particularly vulnerable category of persons displaced by armed conflict and protected under an exceptional humanitarian regime established by Directive 2001/55/EC.

The cumulative financial burden generated by repeated renewal fees may therefore affect economically vulnerable households more severely than comparable administrative charges imposed under ordinary immigration law.

In this context, several considerations appear relevant.

First, none of the publicly available impact assessments confirm that the amount of €100 corresponds to the administrative costs of processing an APS renewal application.

Second, renewal of temporary protection documents is largely repetitive because identity, protection status and legal entitlement have already been established and verified during previous renewals.

Third, the financial burden falls upon a particularly vulnerable category of people who enjoy protection precisely because they cannot safely return home.

This consideration is particularly relevant when assessing proportionality of recurring administrative fees. Although beneficiaries of temporary protection are legally entitled to work, the temporary nature of their residence status may limit their effective integration into the labour market. Therefore, periodic administrative fees may have a greater financial impact on this category of individuals than on individuals with more stable residence status.

The objective of the Directive 2001/55/EC is not merely to grant residence rights but to ensure that such protection is provided rapidly and through simplified administrative procedures. Consequently, when

¹³ Minimum wage in 2026

assessing the proportionality of recurring administrative fees, particular attention has to be paid to the fact that repetitive financial obligations may reintroduce administrative barriers in a protection regime that was specifically designed to minimize them. This consideration is particularly important where residence documents need to be renewed regularly during the period of temporary protection.

The analysis presented above indicates that the proportionality of the French measure needs further thorough examination.

7. Fundamental Rights Considerations

An analysis of the Charter of Fundamental Rights may also become relevant when considering the issue of fees.

The provisions that could potentially be applied include:

Article 1 (human dignity). Although Member States retain discretion on organising administrative procedures, this discretion must be exercised in a manner consistent with the dignity of beneficiaries of temporary protection. Beneficiaries covered by Directive 2001/55/EC are individuals displaced because of armed conflict who frequently rely on public assistance and face significant socio-economic vulnerability. Financial measures that prevent them from maintaining lawful residence may undermine the objective of ensuring a life in dignity envisaged by both the Directive and Article 1 of the Charter.

Article 34(3) of the Charter does not prevent Member States from imposing administrative charges. It does, however, recognise the Unions commitment to combating poverty and ensuring a dignified standard of living for those who lack sufficient resources.

The introduction of a significant renewal fee may have the unintended effect of increasing the risk of social exclusion among persons who are already economically vulnerable. When inability to pay results in the loss of lawful residence, access to employment, housing assistance or other forms of social protection may also be affected. Such consequences appear difficult to reconcile with the objective expressed in the Article 34(3) of the Charter of combative poverty and ensuring a decent existence for persons lacking sufficient resources.

Article 47 of the Charter guarantees the right to an effective remedy. Where the payment of a renewal fee constitutes a precondition for maintaining lawful residence, financial inability to pay may impede the access to judicial protection.

Individuals who lose their legal status as a consequence of non-payment may face practical difficulties in exercising their procedural rights or pursuing judicial review of the administrative decision.

Although a €100 fee does not itself deprive individuals of temporary protection, systematic inability to pay could indirectly interfere with effective enjoyment of these rights. Since France is implementing Union law within the meaning of Article 51(1) of the Charter of Fundamental Rights of the European Union, the latter applies to national measures governing the renewal of temporary protection.

Consequently, any restriction resulting from the payment of administrative fees for renewal must comply with Article 52(1) of the Charter, including the requirements of legality, legitimate objective and

proportionality. Given the economic vulnerability of many displaced persons, the absence of any exemption or réduction mechanism arises the question whether the measure imposes a burden that is disproportionate to the administrative objective pursued.

8. Possible litigation

Several avenues of judicial review appear possible.

Before the French administrative courts applicants could argue that:

- The fee disproportionately restricts rights arising from EU law;
- The administration has failed properly to comply with the principle of proportionality;
- The enforcement measures are incompatible with Directive 2001/55/EC.

The French administrative courts could refer questions to the Court of Justice of the EU concerning:

- Compatibility of the renewal with the effectiveness principle
- Proportionality of recurring administrative charges imposed on beneficiaries of temporary protection
- The scope of Member State discretion under Directive 2001/55/EC in imposing renewal fees.

9. Practical Consequences

If the French administrative courts or the Court of Justice of the European Union conclude that the fee is incompatible with EU law, in practice it can lead to:

1. Annulment of administrative decisions refusing renewal because of non-payment;
2. Reimbursement of unlawfully collected fees;
3. Amendments to the Code of Entry and Residence of Foreigners and of the Right to Asylum provisions (CESEDA);
4. revision of prefectural practice.

Even if this measure withstands judicial review, the courts may require that broader benefits be provided to economically vulnerable recipients.

The introduction of the recurring renewal fee raises broader constitutional questions that go beyond the French system itself : to what extent may Member States impose administrative fees for the continued enjoyment of the rights provided for under the EU's humanitarian protection regime? The answer to this question will determine not only the future application of the Directive 2001/55/EC in France, but also the limits of procedural autonomy in cases where Member States exercise control over rights conferred directly by Union law.

10. Temporary Protection as a Distinct Humanitarian Regime

Temporary protection differs significantly from ordinary immigration schemes. Whereas immigration law regulates voluntary movement across borders, temporary protection constitutes an emergency humanitarian mechanism activated collectively by the Council of the European Union in response to a mass influx of displaced persons.

Beneficiaries do not acquire residence rights on the basis of the results of an individual assessment of their migration intentions. Instead, their legal status derives directly from Union law and reflects the humanitarian obligation of Member States to provide immediate protection to persons fleeing armed conflict.

This distinction is legally significant. Although Member States retain competence to regulate administrative formalities, beneficiaries of temporary protection cannot automatically be treated the same as applicants falling within ordinary immigration procedures where such treatment risks undermining the humanitarian objectives pursued by Directive 2001/55/EC.

11. Conclusion

The introduction of the €100 renewal fee represents an important shift in the French implementation of temporary protection. While Member States enjoy discretion in organising residence documentation, this discretion is constrained by the principles of effectiveness and proportionality under EU law.

The main legal question is not whether France may charge administrative fees, but whether requiring repeated payments from beneficiaries of temporary protection risks undermining the very purpose of temporary protection established by Directive 2001/55/EC.

The preceding analysis demonstrates that the proportionality of the measure introduced by France is open to serious doubt under EU law. Although Member States retain discretion to levy administrative fees, recurring charges imposed upon beneficiaries of temporary protection appear difficult to reconcile with the humanitarian objectives of Directive 2001/55/EC and the principle of effectiveness established in the case law of the Court of Justice of the European Union.

Given the absence of harmonised rules governing renewal fees under the Temporary Protection Directive, the compatibility of the French measure with EU law merits careful examination. In particular, it would be appropriate for the European Commission as the Guardian of the Treaties under Article 17 TEU, to assess whether the recurring €100 fee satisfies the requirements of proportionality and effectiveness and whether additional guidance is necessary to ensure the uniform application of the Directive 2001/55/EC across Member States.

Ultimately, the French measure illustrates a broader issue concerning the limits of Member States' discretion when administering humanitarian protection regimes established by Union law.

Clarification by the European Commission and where appropriate, the Court of Justice of the European Union, would contribute to greater legal certainty both for national authorities and for persons enjoying temporary protection.

Future litigation before French administrative courts and, potentially, the Court of Justice of the European Union may further determine the permissible limits of Member States' financial autonomy in regulating temporary protection regimes.

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