



# Navigating Citizenship in Moldova: Legal changes and rights-based implications

## Summary

This legal briefing note analyses the key amendments to the Citizenship Law, which came into effect in December 2025, highlights areas where rights or benefits may be at risk or could be reinforced and outlines potential advocacy avenues to address those challenges

## Background

Moldova is at a pivotal moment in its citizenship policy. Against the backdrop of regional instability, migration pressures and evolving European integration ambitions, Moldova's new citizenship law amendments, effective December 24, 2025, significantly tighten the requirements. The reform aims both to increase national security safeguards and to modernize the acquisition procedures to align with European standards and reduce abuse and fraud. For many foreigners, including stateless persons, children born in Moldova, long-term residents, displaced persons, persons with dual nationality and refugees — these changes carry significant operational and rights-based implications. Applications for Moldovan citizenship have been steadily increasing, particularly among

Ukrainians and Russians. Ukrainians make up a significant portion of dual or multiple citizenship holders, with many seeking Moldovan citizenship for legal security, mobility, and access to rights.

As of 3 November 2025, according to data provided by the Inspectorate General for Migration, during the period 24 February 2022 – 30 September 2025: **4,620 Ukrainians applied for Moldovan citizenship; 2,692 Ukrainians were granted Moldovan citizenship; 2,974 Ukrainians were officially recognized as Moldovan citizens.** In addition, a notable share of approved applications comes from residents of the Transnistrian region, reflecting simplified procedures for these areas. According to the data provided by the Public Service Agency, in the period from 10 April 2018 to 30 June 2025, 43,505 individuals have been recognized as citizens of the Republic of Moldova under the simplified procedure. Of these, 28,197 (approximately 65%) are residents of the Left Bank of the Nistru River and the municipality of Bender.

As of 1 October 2024, according to the Moldovan Ombudsman Office, **only 5,485 individuals are registered as stateless** in the Republic of Moldova.

In 2023, only 11 people were granted stateless status out of a total of 108 applications submitted.

The New Citizenship Law introduced stricter requirements, including mandatory Romanian language and Constitution tests, clearer procedures for application and refusal, and a system designed to promote transparency, accountability, and civic responsibility, while maintaining the principle of multiple citizenship. Its overarching objectives are to enhance national security, ensure legal clarity, and support the integration of new citizens into Moldovan society; however, the new legal framework has also resulted in increased obstacles to accessing citizenship for vulnerable groups, particularly stateless persons and other individuals at risk of exclusion.

### **Restrictive Residence Requirements for Naturalisation**

The new Citizenship Law maintains existing residence requirements for naturalisation: ten years for general applicants, eight years for refugees and stateless persons, and three years for spouses, parents, or children of Moldovan citizens. While unchanged, the law missed an opportunity to address gaps affecting vulnerable groups.

In particular, the framework does not allow periods of lawful stay under Temporary Protection to be counted toward residence requirements where individuals can demonstrate effective residence in Moldova, such as through employment, education, or housing. A case-by-case approach could support integration without introducing automatic eligibility.

The law also retains an eight-year residence requirement for refugees and stateless persons, which remains relatively long compared to practice in many European countries, where facilitated naturalisation often allows access after three to five years. While international standards do not prescribe specific timeframes, they encourage facilitated naturalisation for these groups, making the decision not to shorten the residence period a missed opportunity to promote durable integration.

### **Mandatory Romanian Language and Constitution Tests**

The new law introduces, for the first time, a requirement that applicants seeking recognition or reacquisition of citizenship must pass Romanian language and Constitution tests, in addition to standard naturalization applicants. Exemptions apply only for children under 14 or people with severe disabilities. Tests are administered by the National Agency for Curriculum and Assessment.

These requirements promote civic integration and knowledge of national values. However, they may disadvantage older applicants, refugees, and stateless people with limited access to language education or learning resources. The lack of broader exemptions risks excluding otherwise well-integrated residents, while the administering authority faces additional logistical and resource pressures.



*After fleeing Ukraine, Andriana rebuilt her life in Moldova and recently transitioned from temporary protection to a spousal residence permit. As she looks ahead to citizenship, new legal requirements entering into force in December 2025 may make that path longer and more complex showing how policy changes can affect families seeking stability and long-term integration. Photo: Anna Celac/NRC*

### **Income Requirements**

Under the previous law, applicants were required to demonstrate a source of income, which was broadly defined. The new law tightens this requirement, mandating that applicants earn at least the minimum wage for the past three years. Combined with the extended residence periods, this change

risks disproportionately excluding women—particularly single mothers—alongside the elderly, persons with disabilities, and those in low-paid or informal work. As a result, these vulnerable groups may remain in prolonged semi-legal status, without full access to citizenship rights or state benefits.

### **Oath of Allegiance Requirement**

Citizenship under the new law is only fully granted once an applicant has taken the Oath of Allegiance, which must be done within one year of the Presidential decree, extending the previous six months deadline. The longer timeframe may allow for undue delays by the competent authorities, potentially resulting in unjustified postponement of the acquisition of citizenship.

As a result, applicants' access to rights linked to citizenship—such as voting, holding public office, and obtaining a national identity card or passport—is delayed until the oath is taken.

### **Clearer Procedures and Transparency**

The law introduces clearer procedures and timelines. Processing deadlines are set for one year - applications must be submitted in person, and refusal grounds are explicitly listed, including criminal records, false documents, sanctions, and national security concerns.

These reforms enhance predictability and reduce arbitrary refusals. However, in-person submission may disadvantage applicants living abroad, people with disabilities, or those in remote areas. Explicit refusal grounds strengthen integrity but may increase rejections for minor or outdated legal issues or where applicants cannot provide required documents due to practical barriers, such as travel restrictions or costs. While processing time limits enhance accountability, high caseloads could strain administrative capacity.

### **Children and Stateless Persons**

The law allows children born in Moldova to acquire Moldovan citizenship if at least one parent has legal residence. This provision aims to reduce the risk of statelessness and aligns the citizenship framework with international standards on child protection. By prioritizing the best interests of the child, it

strengthens safeguards for minors and ensures child-focused decision-making.

However, children of parents without legal residence such as undocumented, *de facto* stateless, or displaced persons, including those with Temporary Protection status, remain at risk of exclusion, highlighting the need for clear guidance to implement this rule in line with Moldova's obligations under the Convention on the Rights of the Child and the 1961 Convention on the Reduction of Statelessness.

### **Mentions of military services**

The law maintains the right to multiple citizenship, supporting diaspora engagement and Moldova's inclusive approach to nationality. However, applicants must now indicate whether they have completed military service in another state, without the law clearly specifying how this information should be verified. The lack of clarity may complicate procedures, particularly if applicants are required to obtain documentation from their country of origin, potentially exposing them to protection and return-related risks.



NRC ICLA team sharing information related to the legal assistance for the displaced populations, 2025. Photo: Anna Celac/NRC

### **Digitalization and Institutional Accountability**

The law strengthens digitalization and accountability by clearly defining the roles of the Agency for Public Services, the Ministry of Foreign Affairs, the Ministry of Interior, and the Security and Intelligence Service, along with introducing evaluation mechanisms. These reforms aim to

improve governance, transparency, and efficiency by streamlining data sharing and reducing duplication or arbitrary decision-making.

Successful implementation depends on technical capacity, inter-agency coordination, staff training, and robust data protection safeguards; without these, the intended efficiency gains may be limited, and inconsistencies or privacy concerns could arise.

## NRC recommendations

### For the Moldovan Government Counterparts:

#### *Reduce Financial Barriers*

- Reduce citizenship application fees to make the process affordable for low-income and vulnerable groups, including migrants, displaced persons from Ukraine, stateless individuals, and long-term residents.

#### *Introducing Flexibility in Language and Constitution Tests*

- To ensure fair and inclusive access to citizenship, the authorities should allow exemptions or alternative assessments for elderly applicants, refugees and stateless people, along with free or affordable language and Constitution courses.

#### *Adjust Residence and Income Requirements*

- Shorter required residence periods for refugees and stateless people.
- Re-examine the possibility of counting the period spent under temporary protection toward the residence period required for obtaining citizenship, potentially subject to clearly defined and specific conditions.

#### *Prevent Child Statelessness*

- To prevent statelessness among children born in Moldova, citizenship should be automatically granted to all children who would otherwise be stateless, regardless of their parents' legal status, in line with international child protection standards.

#### *Maintain Accessible Application Procedures*

- Citizenship applications should be allowed via legal representatives with notarised authorisation, especially for people with disabilities, the elderly, and those abroad.

## NRC recommendations

### For the UN and Civil Society Organisations, including INGOs and NGOs

- Monitor and document citizenship barriers and statelessness cases, using evidence to advocate for fair policies and equal access to rights.
- Expand access to free legal aid for citizenship, documentation, and appeals, including mobile and remote services for rural and displaced populations.
- Ensure inclusive, gender-responsive support tailored to women, single parents, the elderly, and persons with disabilities.
- Strengthen awareness and capacity through community outreach and training for lawyers and local authorities on statelessness and inclusive citizenship.
- Facilitate integration by providing free language and civic courses, employment assistance, and opportunities for social participation.

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