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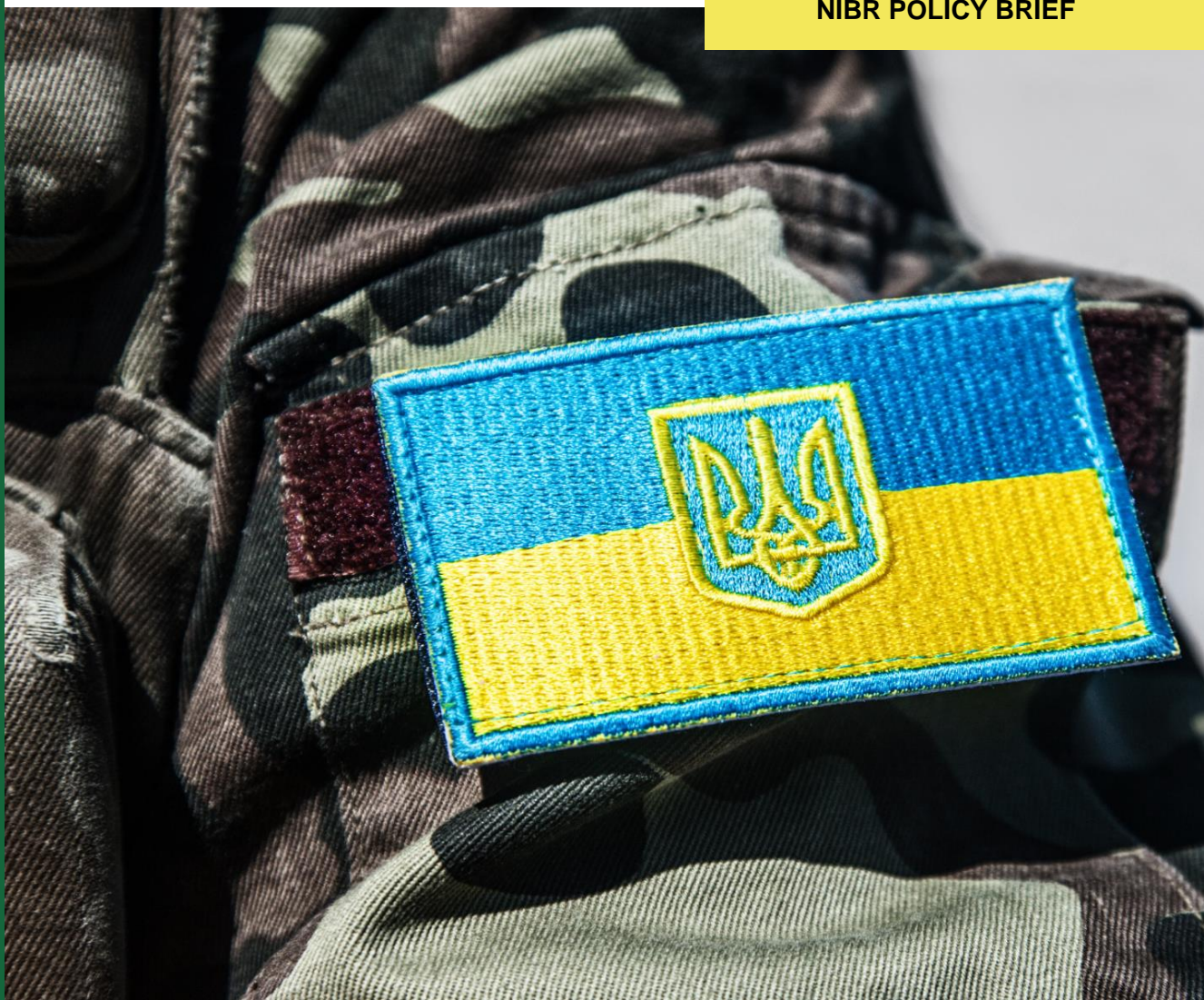
THE NEW MOBILISATION ACT

POLICIES, TARGET GROUPS AND CONSEQUENCES FOR UKRAINIANS LIVING ABROAD

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Summary

Since 24 February 2022, Ukraine has experienced a general mobilisationⁱ, and a state of martial lawⁱⁱ has been introduced. More than two years of courageous but exhausting resistance by Ukrainians against the Russian military aggression has necessitated a review of national legislation regulating military service, mobilisation and military registration.

On 16 April 2024, the new act, 'On Amendments to Certain Legislative Acts of Ukraine on Certain Issues of Military Service, Mobilization and Military Registration'ⁱⁱⁱ (hereafter referred to as the new Mobilisation Act) was signed by the President of Ukraine. The act entered into force on 18 May 2024^{iv}, a month from the day after its publication. The new Mobilisation Act has become one of the most discussed topics in Ukrainian society due to its significant effect on the regulation of mobilisation processes, military service and military registration.

The new Mobilisation Act will not only impact Ukrainians who currently reside in Ukraine, but also the millions of Ukrainians who have fled to or live in other countries. In this policy brief, we present the **main changes the new Mobilisation Act entails for Ukrainian citizens living abroad**, including both those who fled the war after February 2022 and those who lived temporarily or permanently abroad before the full-scale Russian invasion.

Among the **key changes in the new Mobilisation Act** (and other related legislation) are:

- the requirement for all Ukrainian male citizens aged 18–60 years to update their personal data in the military register within 60 days, i.e. by 18 July 2024
- male citizens who reside abroad permanently and who were previously exempt from military registration must now re-register in the military register within 30 days of the new act's entry into force
- although updating data in the military register may be done electronically from abroad, Ukrainians living abroad could subsequently be required to undergo a new medical examination in person, potentially necessitating a return to Ukraine

The consequences of failing to update data or register for military service are:

- higher fines
- a ban on driving vehicles
- restrictions in consular services (such as renewing passports) at Ukrainian institutions abroad

The new **Mobilisation Act expands the target group** for who may be summoned for military service. The changes include:

- lowering the age limit for who can be mobilised from 27 to 25 years of age
- removing the status 'limited suitability for military service'

Although new requirements for registration and mobilisation of women were debated in earlier political discussions, the **new Mobilisation Act does not impose new obligations or requirements for Ukrainian women**. Generally, it is voluntary for women to both register in the military register and enrol in the army. Women with medical or pharmaceutical education actually get a less strict requirements: They are still required to register for military service, but enrolment in military service has become voluntary for this group (they could previously be mobilised during wartime).

The Mobilisation Act introduces certain restrictions for those who are entitled to deferment (temporary postponement) of military service, which may affect Ukrainian students living

abroad. Deferment from military service will now only be granted to those pursuing an education equivalent to full-time or dual form^v, and the level of education must be higher than that previously obtained.

The act also introduces a new requirement for men aged 18–25 years to conduct mandatory basic military service/training. However, it has not yet been clarified whether this will imply that men aged 18–25 years who stay abroad will have to return (temporarily) to Ukraine to conduct such basic military training/service.

With the adoption of the new Mobilisation Act, the Ukrainian government aims to fill gaps in the current system of military registration and strengthen control over the mobilisation process. The new provision regarding the mandatory and prompt updating of conscripts' personal data is likely to lead to further intensification of the mobilisation processes in the near future.

This intensified registration and mobilisation process will bring about several dilemmas for Ukrainian society, Ukrainians living abroad and European countries hosting Ukrainian refugees.

1 The process towards a new Mobilisation Act

The new Mobilisation Act has become one of the most discussed topics in Ukrainian society after the full-scale Russian invasion of Ukraine, as it will affect every Ukrainian family and raise a number of dilemmas for both the state and its citizens. The state must address questions such as how to strike a balance between the urgent need to defend the country and ensure respect for and protect human rights, and how to ensure social justice in society without forfeiting trust in the government.

These and other complex dilemmas are frequently raised in the Ukrainian media and are apparent in the everyday lives of almost every Ukrainian. But one thing is clear – the ongoing Russian military aggression against Ukraine requires reinforcement of the Ukrainian army and assurance of the continuity of the defence of Ukrainian statehood and its citizens.

The public policy process preceding the new Mobilisation Act has been subject to much debate and many revisions. The process started with the Ukrainian military command issuing several statements about the need for additional conscription into the Ukrainian army^{vi}. Already in December 2023, the government submitted the first version of bill No. 10378^{vii} to Parliament. However, it was withdrawn from consideration in early January 2024 following harsh criticism in the public discourse.

On 30 January 2024, the government submitted a new version of the act, which was adopted as a basis by Parliament at the first reading on 7 February 2024. A marker of the temperature of the debate and public engagement around this policy process is reflected in the 4,195 proposals for amendments received during the public consultation process following the first reading.

On 11 April 2024, after lengthy discussions and debates, the bill was voted on by the Ukrainian Parliament at the second reading^{viii}. A pro-government majority ensured sufficient votes to pass the bill with 283 of 401 possible votes^x (the opposition faction ‘Yevropeyska Solidarnist’ did not vote).



2 Main changes affecting Ukrainians abroad

2.1 Requirements for updating data in the military register

Defending the independence and territorial integrity of Ukraine is a constitutional duty of its citizens. Military duty includes enlisting citizens in military records. To this end, male pre-conscripts who turn 17 are required to register at draft offices. The conscription age in Ukraine is 18–60 years.

The new Mobilisation Act introduced new requirements for conscripts to update their personal data in the military register. Ukrainian citizens in the target group are required to update their data within 60 days after the act entered into force. Such updates normally take place at the territorial recruitment and social support centres (hereinafter – TRSSC).

Citizens residing abroad have the option to update their data electronically. Consequently, Ukrainian citizens living abroad do not necessarily need to return to Ukraine to update their data.

However, after updating it, they may be required to undergo a military medical examination. Since such an examination cannot be conducted online, the requirement may necessitate returning to Ukraine in person at some point in the future.



Previously, Ukrainian citizens who lived outside Ukraine for a period exceeding three months were exempt from the obligation to register for military service^x. The new Mobilisation Act requires all Ukrainians in the target group to re-register within 30 days after the act's entry into force. They are therefore subject to the same requirements as other Ukrainian citizens^{xi}.

Updating data in the military register does not automatically imply that the person will be summoned to military service, but it may be an important precondition for being summoned. An important debate in the policy process leading up to the new Mobilisation Act was whether summons may be given through these individual's electronic accounts linked to their military registration. The initial version of draft act 10449 stipulated that 'a summons may be sent to the citizen through the electronic account of a conscript, a person liable for military service, or a reservist'^{xii}. This would imply that those who registered could be summoned for military service electronically. The text of the new act no longer contains this provision, but does not directly address the issue of electronic summons either, thereby neither providing for such a procedure nor prohibiting its implementation. The matter therefore remains open at present and the possibility of introducing electronic summons in the future for those residing abroad cannot be ruled out.

3 Consequences for non-compliance

The new Mobilisation Act also introduces penalties for those who do not update their data in the military register. It is important to emphasise that the previous versions of the act included more extensive restrictions and penalties for non-compliance with the registration requirement, such as automatic inclusion in the Unified Register of Debtors^{xiii}, blocking of bank cards and restrictions on buying, selling or registering property. However, many of these provisions were omitted from the final proposal.

In the new Mobilisation Act, the consequences of not updating data or registering for military service are:

1. higher fines
2. a ban on driving vehicles
3. restrictions in consular services (such as renewing passports) at Ukrainian institutions abroad

Firstly, fines for violating military registration rules previously ranged from 510 to 850 hryvnias. For repeated violations, or violations during a so-called 'special period' (such as wartime), the fine ranged from 850 to 1,700 hryvnias. However, after the new bill^{xiv} entered into force in May 2024, fines for violations of military registration and other military legislation have increased significantly. Now, violating military registration rules carries a fine of between 3,40 and 5,100 hryvnias. For repeated violations, the fine ranges from 5,100 to 8,500 hryvnias. Violations during a special period (such as wartime) will result in fines ranging from 17,000 to 25,500 hryvnias.



Secondly, those who do not update their data will be banned from driving a vehicle (but only by court decision). There are a few exceptions, namely if such a restriction deprives the person of their main lawful source of livelihood, or if the person uses a vehicle due to disability, provides support to a person with disabilities or has a disabled child.

The last restriction is aimed particularly at Ukrainian citizens living abroad. The act introduced the rule that Ukrainians living abroad will only have access to consular services from Ukrainian institutions in foreign countries if they have updated their personal data or if the data on military registration is simultaneously updated when they ask for assistance or services. The exceptions to this rule are in cases concerning: 1) issuance of an identity document for return to Ukraine; 2) consular actions regarding children of Ukrainian citizens, one of whose parents is a foreign citizen or stateless person; and 3) actions taken on applications from Ukrainian citizens who are under arrest, detained or deprived of liberty abroad.

The most important implication of this new restriction for those living abroad is that the issuance or renewal of a passports depends on military registration for those in the target group. Ukrainian passports have a limited validity period and require renewal every 10 years. Thus, persons in the target group who live or fled abroad, and who do not comply with the new military registration requirements, will not be able to renew their passports.

The proposed restrictions caused significant turmoil, even before the new Mobilisation Act entered into force. Many Ukrainian men residing abroad have attempted to contact the relevant institutions since the first version of the act appeared in December 2023^{xv}, and this intensified immediately after the new act was passed by Parliament, but before it entered into force^{xvi}. However, the Ukrainian government responded promptly, and on 23 April 2024 – about two weeks after the new Mobilisation Act was passed – the Ministry of Foreign Affairs instructed the heads of all diplomatic missions of Ukraine to temporarily suspend all consular actions regarding Ukrainian citizens of conscription age except for actions related to the issuance of identity documents for return to Ukraine^{xvii}. It was argued by the Ministry of Foreign Affairs that the introduced ban was a temporary measure due to the need to resolve issues regarding the military registration of mobilisation-age citizens residing abroad. The temporary restrictions would not affect the provision of consular assistance to Ukrainian citizens in the event of emergencies (traffic accidents, detentions, natural disasters, etc.).



4 Expanded target group for mobilisation and military training

Previously, the main rule was that men from the age of 17 were obliged to register for military service, men aged 18–60 were conscripts and men aged 27–60 could be mobilised. The new Mobilisation Act extends the group that may be summoned for military service. The changes include:

1. reducing the age limit for those who can be mobilised from 27 years to 25 years
2. introducing basic military service/training for men aged 18–25 years rather than conscription military service
3. removing the status 'limited suitability for service'

4.1 Lowering the age limit for mobilisation from 27 to 25

The issue of reducing the conscription age for men from 27 to 25 years has remained highly debated for some time. In May 2023, the Ukrainian Parliament amended the Act on Military Duty and Military Service^{xviii} to reduce the maximum age for conscripts from 27 to 25 years. For a long time, this law was not signed by the President of Ukraine, who, in one of his speeches in the winter of 2023, stated that such a decision should be further substantiated^{xix}. However, the act was finally signed by the President on 2 April 2024 in connection with the adoption of the new Mobilisation Act. The introduced changes enable the mobilisation of conscripted men aged 25 and 26, thus expanding the age range. This same age threshold is mentioned in the new Mobilisation Act.

4.2 Mandatory basic military training for men aged 18–25

Another important change affecting male Ukrainians aged 18–25 years is the introduction of 'basic military service' rather than regular 'conscription military service'. During a state of war, regular conscription military service does not take place. The new Mobilisation Act will restore mandatory basic military service for men, regardless of the state of war, while it remains voluntary for women. The period for undergoing basic military training can be chosen independently, but it must occur before the individual turns 25. During martial law, basic military service lasts three months, of which one month is basic general military training and two months are specialised training. Deferments are granted to those continuing their education at a university, college, etc., and those unfit for service for health reasons.

However, male students in higher education institutions, vocational schools and military academies who are exempt from basic military *service* must nonetheless undergo basic military *training*. Basic military training courses will be implemented in relevant educational institutions from September 2025. For female students, basic military training is voluntarily.

Those who do not complete basic military service or training will not be able to obtain employment in public service, or work in the public prosecutor's office, police or local government agencies.

It is too early to conclude how this requirement to undergo basic military service or training will affect those in the target group living abroad. It is not clear at present whether they will have to return to Ukraine to fulfil the obligation to participate in this training, or whether it may be conducted online.

4.3 Removal of the ‘limited suitability for military service’ status

Previously, all men aged 18–60 who received summons from the TRSSC underwent a medical examination by the military medical commission (MMC). After the medical examination, it could be determined that the person was of ‘limited suitability for military service’. Depending on the state of health, military specialty, position held and age of the conscript, it was determined which type of service and military work would be appropriate for a person with limited suitability. During wartime, individuals with limited suitability may be mobilised, but they are not sent to the frontline, for example in highly mobile airborne forces or marine infantry. Instead, they could be summoned to service in the TRSSC, institutions, organisations and educational institutions^{xx}.

However, another new act that entered into force on 4 May 2024, entitled the Act on Amendments to Certain Laws of Ukraine to Ensure the Rights of Servicemen and Policemen to Social Protection^{xxi}, excluded the category ‘limited suitability for military service’. This change implies that persons who had previously been deemed to have limited suitability were subject to re-examination within nine months to determine their fitness for military service. Based on the results of the updated medical examination, and taking into account their level of education, personal qualities, occupation and specialisations, the commission for enlistment would place them into one of the following categories:

- fit for military service and preliminarily assigned to service in the Armed Forces of Ukraine or another military formation
- temporarily unfit for military service, requiring treatment
- subject to referral for additional medical examination and re-examination (with the indication of the date of examination)
- unfit for military service

The commission may also report a person to the law enforcement agencies for ungrounded evasion of enlistment. This point is not described further in the current legislation and there is uncertainty as to what it may imply. To minimise the risk of corruption, the new act also requires the Ukrainian government to develop measures to verify the validity of decisions made by medical commissions. The validity of such decisions regarding disability for male Ukrainian citizens aged 25–50, who were first recognised as having a disability of group II or III^{xxii} after 24 February 2022, will be verified. An exception is made for those citizens who were assigned a disability of group II or III as a result of an illness or injury sustained while defending the Homeland. Ukrainians living abroad granted the status of limited suitability are also required to undergo a re-examination to determine fitness for military service within 9 months. This would necessitate returning to Ukraine for a medical check.

4.4 Status quo for women

Before the full-scale invasion in February 2022, military registration for all women in Ukraine was voluntary. After 1 October 2023, however, certain categories of women became subject to military registration^{xxiii}. Women who had completed medical or pharmaceutical education at vocational, professional secondary or higher education levels – and who were fit for military service based on health and age criteria – were subject to military registration and subject to potential mobilisation during wartime. However, the new Mobilisation Act actually softens the requirements for this latter group, with registration remaining mandatory but mobilisation strictly voluntary.

5 Deferral from military service

The new Mobilisation Act also regulates which groups may be granted deferral (temporary postponement) from mobilisation for military service.

Overall, the law maintains the rules for deferral for most groups. For example, deferment rights remain in place for those who have three or more children under the age of 18 (but only if there are no arrears in child support payments), those with certain diagnosed disabilities and for people with a special family situation (e.g. single parents of a child under 18; if one of the parents is already mobilised; if the child has disabilities; adopters of a child under 18; those caring for a sick spouse and others). It also expands the group entitled to deferral to include persons who have been in captivity and family members of individuals posthumously awarded the title 'Hero of Ukraine'.

However, the new Mobilisation Act narrows down the group of students with the right to deferment. Previously, deferment was provided for students of vocational (vocational-technical), specialised secondary and higher education institutions, trainee assistants, postgraduates and doctoral students studying full-time or in a dual form of education^{xxiv}. Now, the level of education must be higher than that previously obtained in order to be granted deferral. In other words, those pursuing a second or third degree will not be eligible for deferment. Changes will not affect academic and teaching staff of educational institutions if they work in 75 per cent of a full-time position or more.

In contrast to these restrictions (and the other new requirements), the new Mobilisation Act significantly expands the group of civil servants and public figures who are exempt from mobilisation. Several groups of civil servants were already exempt from mobilisation, including members of parliament and those working in various military and security services, but the new act significantly expands this group to include heads of ministries and state agencies and their deputies, judges at different levels, specific employees of the Ministry of Internal Affairs and the Ministry of Foreign Affairs, and other specified civil servants.



6 Implications and dilemmas going forward

6.1 Key implications for Ukrainian citizens abroad

All *male* Ukrainian citizens aged 18–60 will feel the impact of the new Mobilisation Act, regardless of whether they are living temporarily or permanently abroad. The new act requires the updating of personal data in the Ukrainian military register, and although this may be done electronically, some groups may subsequently need to return to Ukraine to conduct a new medical examination in person. Furthermore, although the new Mobilisation Act does not introduce the possibility of electronic summons for those residing abroad, it does not rule out the possibility of introducing such a system in the future after conscripts have updated their personal data.

In addition to the general consequences for all Ukrainians who fail to comply with the new registration requirements in the form of higher fines and restrictions on driving vehicles, Ukrainians living abroad may risk being left without a passport if they are unable to renew it. This may, in turn, entail mobility challenges, for example if they need to cross European borders or wish to cross the Ukrainian border to visit their home country. This situation may also require action on the part of the governments of countries receiving Ukrainian refugees.

6.2 Key implications for governments hosting Ukrainian refugees

The new Mobilisation Act poses many dilemmas for policy makers in European countries currently hosting Ukrainian refugees. Representatives of the Ukrainian government have stated that Ukraine will not forcibly return conscripted men from abroad^{xxv}. Ukrainian lawyers also conclude that there are currently no coercive mechanisms for returning conscripts to Ukraine^{xxvi}. However, European countries have already sent diverging signals on how they will react to the implications of the new Mobilisation Act. For example, Polish officials have indicated that they may decide to stop issuing residence permits for Ukrainian conscripted men if requested by the Ukrainian government^{xxvii}, while the German government has already assured Ukrainians of the possibility of obtaining a German travel document that can replace their passport^{xxviii}.

Although European countries have responded to the reception of Ukrainian refugees in a more unified manner when compared to previous influxes of asylum seekers, there are still striking differences in their overall reception and Ukrainians' rights in the host countries^{xxix}. How European governments will respond to the implications of the new Mobilisation Act for those already residing in or fleeing to their countries remains to be seen, but they stand before several dilemmas:

- How to weigh up the dilemma of helping Ukraine defend itself by aiding in the (voluntary or forced) return of citizens in the target group for mandatory mobilisation against ensuring human rights by providing protection for those fleeing from war?
- Whether to accept all (new) persons seeking protection or only those *not* liable for military service?
- How to deal with a potential growing population of Ukrainians who may not be able to renew their formal documents (e.g. passports)?

6.3 Key social implications for Ukrainian society

With the adoption of the new Mobilisation Act, the Ukrainian government aims to fill gaps in the current system of military registration and strengthen control over the mobilisation process. The new provision regarding the mandatory and prompt updating of personal data of conscripts is likely to lead to further intensification of mobilisation processes in the near future. Furthermore, to respond to the ongoing Russian military aggression, the Ukrainian government seeks to expand the target group that can be mobilised to join the ranks of the Ukrainian army by lowering the conscription age to 25 and removing the category of 'limited suitability for military service'. Another important change is that the state will introduce more strict controls of the medical examinations undergone by conscripts to minimise potential corruption risks relating to the evasion of service. Overall, the new Mobilisation Act increases the state's control over the everyday lives of citizens and increasingly orients society's activities towards wartime conditions.

On the other hand, the Mobilisation Act also expands the list of categories of civil servants entitled to deferment from military service. This apparently conflicting approach may challenge the average citizen's perception of social justice and lead to increased social tension in Ukrainian society. Although there may be valid societal reasons for exempting these groups of civil servants, insufficient communication on the part of the government regarding the rationale and necessity of such changes may deepen the social gap between the government and civil society in Ukraine.



Endnotes

ⁱ Decree of the President of Ukraine No. 69/2022 dated 24 February 2024 'On General Mobilization'
<https://www.president.gov.ua/documents/692022-41413>.

ⁱⁱ Decree of the President of Ukraine No. 64/2022 dated 24 February 2024 'On the introduction of martial law in Ukraine'
<https://www.president.gov.ua/documents/642022-41397>.

ⁱⁱⁱ <https://zakon.rada.gov.ua/laws/show/3633-20#Text>

^{iv} Except for paragraphs twelve and thirteen of subparagraph 2 of clause 8 of Section I of this law (regarding amendments to the fourth and fifth parts of Article 6 of the Law of Ukraine 'On Mobilization Preparation and Mobilization'), which shall enter into force eight months from the day following the publication of this law.

^v The dual form of obtaining professional pre-higher and higher education combines learning in educational institutions with on-the-job training at enterprises. Full-time students can use this method to obtain higher education qualifications (more details available at: <https://zakon.rada.gov.ua/laws/show/z0929-23#Text>).

^{vi} <https://news.liga.net/ua/politics/news/zaluzhnyi-pro-mobilizatsiiu-500-000-ukraintsiv-komanduvannia-zapytu-na-pevnu-kilkist-ne-robylo>

^{vii} <https://itd.rada.gov.ua/billInfo/Bills/Card/43451>

^{viii} https://w1.c1.rada.gov.ua/pls/radan_gs09/ns_golos?q_id=26092

^{ix} The constitutional composition of the Verkhovna Rada of Ukraine consists of 450 people's deputies. In the 2019 elections, only 424 deputies were elected, with 26 seats reserved for majoritarian constituencies that were at that time on territories occupied by Russia in Crimea, and the Donetsk and Luhansk regions. Some deputies lost their mandates due to appointments to other positions, mainly within the government. Another trend has been the voluntary resignation of deputies following the start of Russia's full-scale invasion.

^x <https://zakon.rada.gov.ua/laws/show/2232-12#Text>

^{xi} <https://www.kmu.gov.ua/npas/pro-realizatsiiu-eksperymentalnoho-proektu-shchodo-utochnennia-oblikovykh-danykh-pryzovnykh-viiskovozoboviazanykh-ta-rezervistiv-iaki-postiino-abo-tymchasovo-perebuvauiut-i170524-565>

^{xii} <https://yvu.com.ua/pro-elektronni-povistky/>

^{xiii} The Unified Register of Debtors is maintained to publish real-time information about debtors' outstanding property obligations and to prevent the disposal of property by debtors.

^{xiv} <https://itd.rada.gov.ua/billInfo/Bills/Card/43452>

^{xv} <https://www.radiosvoboda.org/a/ukrayinskyj-pasport-mobilizatsiya-bizhentsi-choloviky/32750770.html>

^{xvi} <https://tsn.ua/exclusive/ukrayinci-buntuyut-za-kordonom-yak-otrimati-pasport-i-kogo-mozhut-deportuvati-2568081.html>

^{xvii} <https://china.mfa.gov.ua/news/shchodo-vchinennya-konsulskih-dij-v-zdu-okremim-kategoriyam-gromadyan-ukrayini>

^{xviii} <https://itd.rada.gov.ua/billInfo/Bills/Card/41904>

^{xix} <https://www.slovovidlo.ua/2023/12/19/novyna/bezpeka/prezydent-vidpoviv-chy-pidtrymaye-mozhlyvu-mobilizacziyu-zhinok-ta-znyzhennya-pryzovnoho-viku>

^{xx} <https://zakon.rada.gov.ua/laws/show/z1109-08#Text>

^{xxi} <https://zakon.rada.gov.ua/laws/show/3621-20#Text>

^{xxii} Group I disability includes individuals with the most severe health conditions, who are completely unable to take care of themselves and are entirely dependent on others for performing essential daily functions. The basis for establishing Group II disability is stable, significantly severe functional impairments in the body caused by illness, injury, or congenital defect, which lead to substantial limitations in the person's ability to live independently. Group III disability is characterised by stable, moderately severe functional impairments in the body, resulting in moderate limitations in the person's ability to live independently, including their capacity to work. More details available here: <https://zakon.rada.gov.ua/laws/show/1317-2009-%D0%BF/page#n153>

^{xxiii} <https://zakon.rada.gov.ua/laws/show/2232-12#Text>

^{xxiv} <https://zakon.rada.gov.ua/laws/show/3543-12#Text>

^{xxv} <https://suspiine.media/735345-primusovogo-povernenna-ukrainciv-z-za-kordonu-ne-bude-stefanisina/>

^{xxvi} <https://fakty.com.ua/ua/ukraine/20231222-pryzov-ukrayincziv-z-za-kordonu-shho-vidomo-pro-namiry-derzhavy-povernuty-gromadyan-ta-chy-zakonno-cze/>

^{xxvii} <https://www.rbc.ua/rus/news/polshchi-zrobili-novu-zayavu-shchodo-povernennya-1714496995.html>

^{xxviii} <https://www.dw.com/uk/ukrainci-mozut-zalisatisa-u-frn-i-z-nedijsnim-pasportom/a-68919813>

^{xxix} Hernes et al. (2023): <https://oda.oslomet.no/oda-xmlui/handle/11250/3112660>