



KONRAD  
ADENAUER  
STIFTUNG

CASE STUDY OF THE  
**IMPLEMENTATION OF THE  
EUROPEAN UNION VISA  
LIBERALIZATION ACTION PLAN  
IN GEORGIA AND THE REPUBLIC OF MOLDOVA**





## The Study Report

# Case Study of the Implementation of the European Union Visa Liberalization Action Plan in Georgia and the Republic of Moldova

*(General organization of the implementation process, Document Security, Migration and Asylum Management)*

Authors:

**Shalva Khutsishvili**

**Nana Tabagua**

**Ketevan Gomelauri**

**Cristina Lesnic**

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## Case Study of the Implementation of the European Union Visa Liberalization Action Plan in Georgia and the Republic of Moldova

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### EXECUTIVE SUMMARY

This study examines the experience of the Republic of Moldova and Georgia in implementing the European Union Visa Liberalization Action Plans (VLAPs). It focuses on the organization of the implementation process and core reforms in the areas of document security and migration and asylum, excluding the integrated border management component. The study aims to provide relevant Armenian stakeholders with practical insights to anticipate potential challenges and apply proven approaches in advancing the reform process.

The analysis is primarily based on information and observations generously shared by former senior officials directly involved in the implementation process. This is complemented by relevant primary and secondary open-source materials.

The study finds that, despite similarities in post-Soviet legacy, the experience of the European integration process, and VLAP requirements, Moldova and Georgia adopted distinct approaches to reform implementation. Across both countries, however, reforms in the examined domains were driven by three main pathways: (1) the comprehensive modernization of legislative frameworks, accompanied by the development of detailed secondary regulations and operational procedures; (2) the large-scale digitalization of administrative systems and processes; and (3) the consistent strengthening of human resources through targeted and continuous training, including at senior management levels.

In both countries, VLAP implementation was characterized by the consolidation of political leadership, technical expertise, and strategic communication through *ad hoc* governance platforms. Political leadership functioned primarily as an enabler, while technocrats drove the process. These arrangements were supported by dedicated communication campaigns aimed at facilitating public understanding and acceptance of reforms. The adoption of national-level plans, translating VLAP requirements into actionable and measurable tasks for public administrations, combined with mobilization of resources and early identification of potential challenges, such as language barriers and infrastructural constraints, these factors proved critical in the preparatory phase. International assistance played a significant role in supporting reforms; however, its effectiveness was closely linked to alignment with sustainability objectives to reduce long-term donor dependence.

The experience of document security reforms demonstrates that progress in this area can be achieved through two alternative approaches: a comprehensive, multidimensional reform integrating the modernization of business processes, simplification of public services, and strengthening of security safeguards; or a multi-stage, problem-oriented approach based on the gradual development of the system in the long term through separate projects. In both cases, the digitalization of databases and business processes, together with the integration of information resources and operational systems across government agencies, constitutes the backbone of reform. These processes are further reinforced by the introduction of integrity measures, personal data protection standards, and information security systems. The study provides a comparative analysis of both reform trajectories, from pre-VLAP developments through to the implementation phase.



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In the area of migration and asylum, the study identifies the emergence of two distinct institutional models of governance and management. Although both countries apply a whole-of-government approach, Georgia developed a more horizontal and balanced governance structure involving multiple agencies, while the Republic of Moldova opted for a collaborative model with a more dominant coordinative role of the Ministry of Internal Affairs. Similarly, migration management authorities in Georgia are more dispersed among stakeholders, whereas in Moldova, operational functions related to enforcement and service delivery are concentrated within the Bureau of Migration and Asylum, a subordinate agency of the Ministry of Internal Affairs. The VLAP also contributed to strengthening policy planning and analytical capacities in both countries, primarily through donor-supported initiatives that enhanced human resources and digital infrastructure. Key common innovations introduced under VLAP implementation included accelerated asylum procedures and assisted voluntary return mechanisms for foreign nationals.

Overall, the analysis demonstrates that effective VLAP implementation depends on the interaction of interagency coordination, institutional capacity, and proper awareness of specific interest groups, supported by structured international assistance. While both Georgia and Moldova have achieved significant progress, the long-term sustainability of reforms remains closely linked to the gradual strengthening of domestic ownership. These findings are particularly relevant for Armenia in designing coherent and resilient implementation frameworks.



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## Abbreviations

Abbreviation	Full Meaning / Definition
AA	Association Agreement
API	Advance Passenger Information
AVR	Assisted Voluntary Return
BMA	Bureau for Migration and Asylum ( <i>Moldova</i> )
BMP	Brief Migration Profile
CCMAA	Coordination Commission on Migration and Asylum Activities ( <i>Moldova</i> )
CMM	Collaborative Management Mechanism
CNPDCP	National Center for Personal Data Protection ( <i>Moldova</i> )
CSOs	Civil Society Organizations
DCM	Citizenship and Migration Electronic Management System ( <i>Georgia</i> )
DGRIIE	General Directorate for International Relations and European Integration ( <i>Moldova</i> )
EMN	European Migration Network
EMP	Extended Migration Profile
EU	European Union
EUHLPAM	European Union High-Level Policy Advisory Mission ( <i>Moldova</i> )
GCIGEU	Government Commission for the Integration of Georgia into the European Union
GIZ	German Agency for International Cooperation
ICAO	International Civil Aviation Organization
ICMPD	International Centre for Migration Policy Development
ICT	Information and Communication Technology
IDNP	Personal Numeric Identifier ( <i>Indicele de Identitate al Numărului Personal</i> )
IOM	International Organization for Migration
IRD	International Relations Department ( <i>Ministry of Internal Affairs of Georgia</i> )
ISAA	Information Systems Agency of Armenia
ISMS	Information Security Management System
M&D	Migration and Development
MCS	Migration and Citizenship Service ( <i>Armenia</i> )
MFAEUI	Ministry of Foreign Affairs and European Integration ( <i>Moldova</i> )
MIAG	Ministry of Internal Affairs of Georgia
MIARM	Ministry of Internal Affairs of the Republic of Moldova
MITC	Ministry of Information Technology and Communications ( <i>Moldova</i> )
MMP	Medium Migration Profile



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MP	Migration Profile
NATO	North Atlantic Treaty Organization
NGOs	Non-Governmental Organizations
OSCE	Organization for Security and Co-operation in Europe
PAR	Public Administration Reform
PIN	Personal Identification Number ( <i>Georgia</i> )
PKD	Public Key Directory ( <i>ICAO</i> )
PRADO	Public Register of Authentic Identity and Travel Documents
PSA	Public Service Agency ( <i>Moldova</i> )
PSDA	Public Service Development Agency ( <i>Georgia</i> )
RCMES	Readmission Case Management Electronic System ( <i>Georgia</i> )
SAC	Supplemental Access Control
SCMI	State Commission on Migration Issues ( <i>Georgia</i> )
SIENA	Secure Information Exchange Network Application
SIAMMA	Integrated Information System Migration and Asylum ( <i>Moldova</i> )
SOPs	Standard Operating Procedures
SPR	State Population Registry ( <i>Moldova</i> )
TAC	Temporary Accommodation Center ( <i>Georgia</i> )
TAIEX	Technical Assistance and Information Exchange
UMAS	Unified Migration Data Analytical System ( <i>Georgia</i> )
UNHCR	United Nations High Commissioner for Refugees
VLAP	Visa Liberalization Action Plan
WoGA	Whole-of-Government Approach



## Chapter 1. Introduction

In recent years, Armenia intensified its cooperation with the European Union (EU), culminating in the launch of the visa liberalization dialogue in September 2024.<sup>1</sup> As a result, in November 2025, the Armenian Government received its Visa Liberalization Action Plan (VLAP).<sup>2</sup>

Moldova and Georgia, Armenia's Eastern Partnership peers, successfully received visa-free status in 2014 and 2017, respectively.<sup>3</sup> Their experience demonstrates that the VLAP implementation process in post-Soviet jurisdictions triggers substantial reforms spearheading new standards and practices in governance, policy planning, and enforcement. Successful implementation of such reforms requires significant effort and coordinated action among governments, civil society and international partners.

This study aims to support Armenian stakeholders and international partners with evidence-based insights for the effective structuring and implementation of the VLAP, by identifying and avoiding pitfalls and applying successful solutions. To this end, the study explores the experiences of Moldova and Georgia in the implementation of the VLAP. Their shared Soviet legal and governance legacy, coupled with their reform trajectories, provides valuable lessons for Armenia on how to anticipate challenges, accelerate progress, and sustain reforms.

In Armenia, the VLAP has been entrusted to the Ministry of Internal Affairs,<sup>4</sup> which is one of the key stakeholders for which this study has been prepared. The Ministry plays a central role in coordinating the implementation process at the working level across government institutions. It is also responsible for a substantial share of the required reforms, as many VLAP benchmarks fall within its direct mandate.

In this context, the study focuses on the experiences of Georgia and Moldova in implementing reforms under Block 1 (document security) and Block 2 (migration management and asylum, excluding integrated border management). While Armenia is at the initial stage of planning and mobilizing resources for the actual enforcement process, the study concentrates on the practices of Georgian and Moldovan governments in terms of the organization of the implementation process, including coordination with the donor community and strategic communication components.

While exploring the Moldovan and Georgian experience, an important contextual difference with Armenia should be highlighted. For those countries, the VLAP implementation was part of, and another milestone in, a wider and more complex EU accession process, whereas in Armenia, at the current stage, the EU visa liberalization process is rather a standalone project than part of a broader EU integration endeavor.

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<sup>1</sup> <https://www.kas.de/documents/269781/0/Visa+Dialogue.pdf/ac1a12e1-bd68-9705-96e7-b67f9a2de77d?version=1.0&t=1733837270951> Accessed 23.04.2026.

<sup>2</sup> [https://home-affairs.ec.europa.eu/news/commission-presents-action-plan-visa-liberalisation-armenia-2025-11-05\\_en](https://home-affairs.ec.europa.eu/news/commission-presents-action-plan-visa-liberalisation-armenia-2025-11-05_en) Accessed 23.04.2026.

<sup>3</sup> [https://home-affairs.ec.europa.eu/policies/international-affairs/engagement-partner-countries/eastern-partnership/visa-liberalisation-moldova-ukraine-georgia-and-armenia\\_en](https://home-affairs.ec.europa.eu/policies/international-affairs/engagement-partner-countries/eastern-partnership/visa-liberalisation-moldova-ukraine-georgia-and-armenia_en) Accessed 23.04.2026.

<sup>4</sup> [https://home-affairs.ec.europa.eu/news/commission-presents-action-plan-visa-liberalisation-armenia-2025-11-05\\_en](https://home-affairs.ec.europa.eu/news/commission-presents-action-plan-visa-liberalisation-armenia-2025-11-05_en) Accessed 23.04.2026.



## Chapter 2. Methodology

The study employs qualitative research methods to collect and analyze data. The data were gathered through desk research, drawing on primary sources such as official policies, strategies, and reports, as well as secondary sources, including analytical documents, academic studies, surveys, and other available materials. In addition, semi-structured interviews were conducted primarily with key informants directly involved in the implementation of VLAP-related reforms in Georgia and Moldova, as well as experts working with government institutions in these countries, to capture first-hand implementation experience and lessons learned. These insights were complemented by interviews with Armenian government officials and civil society representatives to assess the current baseline and contextualize the findings. The study's findings and recommendations are grounded in a comparative analysis of evidence collected in Armenia, Moldova, and Georgia.

The study is subject to certain limitations due to the sensitivity of information within the research areas. Some internal business processes and technical solutions, although not formally classified, are governed by internal standard operating procedures and are not intended for public disclosure. This approach limited the researchers' access to such information and, consequently, resulted in certain constraints on the detailed review of specific issues, particularly in the document security domain.

## Chapter 3. The Security Context of VLAP Implementation

The successful implementation of national initiatives depends on multiple factors, including the national security environment. While a comprehensive analysis of Armenia's threat landscape falls beyond the scope of this study, recent reporting on hybrid threats<sup>5</sup> calls for brief consideration of those most relevant to VLAP implementation. The experiences of Moldova and Georgia demonstrate that the VLAP process may be a target of specific threats undermining progress by slowing down or obstructing particular activities. Such actions may also have wider implications for the country's overall security profile.

Considering the nature and potential consequences, these threats can be theoretically divided into two categories: (1) those directly linked to the VLAP implementation process, and (2) post-VLAP challenges that emerge as a result of Visa Free Travel and may affect its sustainability. The spectrum of such threats includes information manipulation campaigns, cyber threats, and other subversive measures aimed at hampering progress in the VLAP implementation process. Post-VLAP threats primarily target migration management and the fight against organized transnational crime.

Information manipulation activities in selected EU countries are intended to seed anti-Armenian sentiments amplified by generally trending anti-immigration narratives. In the case of Georgia,

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<sup>5</sup> <https://oc-media.org/armenia-requested-eu-dispatch-anti-russian-disinformation-team-ahead-of-elections-rfe-rl-reports/>  
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there was an extensive discussion in German media on the rising number of serious crimes committed by Georgian asylum seekers.<sup>6</sup> The actual number of crimes committed by ethnic Georgians was approximately 8000 out of the total 911,864 registered cases in 2015, when the media reporting was most active.<sup>7</sup> However, the negative information coverage put huge pressure on the German authorities and hindered the decision-making process as it coincided with the migrant crisis in Europe.<sup>8</sup> Serious efforts by the Georgian side were required to address the problem. Although the case was not formally classified as such, it appeared to contain elements associated with an information influence operation, as described in contemporary research.<sup>9</sup> Later, a similar pattern was observed in Germany in the “Lisa case”, which is now widely cited as an example of information manipulation.<sup>10</sup>

Another dimension of information manipulation activities usually takes place within the country implementing the VLAP. Such manipulations aim at fostering anti-EU sentiments among the local population and usually use different narratives, including LGBTQ topics,<sup>11</sup> conspiracy theories, exaggerating potential risks such as “brain drain”, diminishing the importance of free movement with Europe, etc.<sup>12</sup> The narratives may even contradict each other; however, their cumulative effect is to spread nihilism in the targeting society, deepen social distrust towards the EU, and demoralize those involved in the VLAP implementation process.

Cyberattacks could serve as a decisive factor in amplifying the effects of disinformation campaigns or as a separate and distinct threat to VLAP implementation. Many of the advancements required by the VLAP are directly linked to the accelerated digitalization process, which might be seriously undermined by cyber threats. For example, in 2015 alone, several private entities and government institutions, including the Ministry of Foreign Affairs, which led interagency coordination of the VLAP implementation process in Georgia, were targeted by a major cyberattack.<sup>13</sup>

Finally, VLAP implementation may also give rise to threats to integrity within the public service. External threat actors are highly likely to carry out covert activities (active measures) to leverage their assets within the public service for subversion of key reforms and development initiatives.

Post-VLAP threats traditionally relate to migration management and public safety. The experience of Georgia and Moldova shows that certain violations of visa-free travel rules are highly likely to take place and need to be mitigated. For example, in the case of Georgia, after receiving visa-free travel, the number of Georgian asylum seekers in EU Member States soared and remained on an upward trajectory for an extended period.<sup>14</sup>

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<sup>6</sup> [https://www.bild.de/politik/inland/organisiertes-verbrechen/union-lehnt-visa-freiheit-fuer-georgier-ab-46146338\\_bild.html#:~:text=Innen%2DExperte%20warnt:%20%E2%80%9EGeorgische%20Asylbewerber%20sind%20so%20kriminell%20wie%20keine%20andere%20Ausl%C3%A4ndergruppe.%E2%80%9C](https://www.bild.de/politik/inland/organisiertes-verbrechen/union-lehnt-visa-freiheit-fuer-georgier-ab-46146338_bild.html#:~:text=Innen%2DExperte%20warnt:%20%E2%80%9EGeorgische%20Asylbewerber%20sind%20so%20kriminell%20wie%20keine%20andere%20Ausl%C3%A4ndergruppe.%E2%80%9C) Accessed 23.04.2026.

<sup>7</sup> <https://www.amerikiskhema.com/a/georgian-pm-kvirikashvili-visits-to-germany/3377610.html> Accessed 23.04.2026.

<sup>8</sup> <https://www.unhcr.org/news/stories/2015-year-europes-refugee-crisis> Accessed 23.04.2026.

<sup>9</sup> [https://mpf.se/download/18.6888ebfe19b2bdfbd24538b/1768813534949/Psychological\\_defence\\_TGA.pdf](https://mpf.se/download/18.6888ebfe19b2bdfbd24538b/1768813534949/Psychological_defence_TGA.pdf) Accessed 23.04.2026.

<sup>10</sup> [https://www.baks.bund.de/sites/baks010/files/working\\_paper\\_2016\\_11.pdf](https://www.baks.bund.de/sites/baks010/files/working_paper_2016_11.pdf) Accessed 23.04.2026.

<sup>11</sup> [https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/653644/EXPO\\_BRI\(2021\)653644\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/653644/EXPO_BRI(2021)653644_EN.pdf) Accessed 23.04.2026.

<sup>12</sup> <https://euvsdisinfo.eu/5-common-pro-kremlin-disinformation-narratives/> Accessed 23.04.2026.

<sup>13</sup> <https://gfsis.org.ge/files/library/opinion-papers/52-expert-opinion-eng.pdf> Accessed 23.04.2026.

<sup>14</sup> <https://gip.ge/wp-content/uploads/2019/10/Policy-paper-9-Tatia-Dolidze-.pdf> Accessed 23.04.2026.



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Another aspect of migration challenges concerns the potential influx of third-country nationals. An increased number of foreign nationals may use Armenia as a transit point to reach the EU, either legally or illegally, including by seeking asylum or attempting to manipulate Armenian documents. This would place Armenia's migration management and asylum system under significant pressure, while also increase integrity risks within the government agencies.

In addition, visa liberalization with the EU could potentially facilitate the expansion of transnational activities and domestic influence of Armenian organized crime groups, as it increases mobility and provides access to new resources and operational environments.<sup>15</sup> Moreover, many of these actors are integrated into Russian organized crime networks and already possess significant international reach,<sup>16</sup> which may enable their rapid adaptation to evolving conditions. This would further underscore the need for enhanced law enforcement cooperation between the EU and Armenian counterparts.

While many challenges affecting the VLAP implementation process can be mitigated through targeted, short-term measures, post-VLAP risks require a more structural approach focused on long-term resilience. Addressing these risks demands sustained investment in institutional capacity, enhanced international cooperation, and forward-looking policy planning. Integrating these elements early in the VLAP implementation process is essential to ensure the sustainability of reforms and the long-term viability of the visa-free regime.

## Chapter 4. Institutional Organization of the VLAP Implementation

### 4.1. General Overview

There is no universal approach for organizing and coordinating the VLAP. Its structure must derive from the specific realities of the country, the implementing institutions, the pace of alignment with VLAP requirements, and the capacities and resources invested in the process. The overall success of VLAP implementation depends on effective management of the envisaged activities. While the VLAP is often perceived as a technical endeavor requiring strong sectoral and technical expertise, in practice, it represents a broader governance process that relies on sustained commitment and coordinated contributions from political leadership, public administration, international partners, and civil society. Its implementation follows a continuous, iterative cycle encompassing assessment and planning, awareness-raising and practical enforcement, as well as reporting and communication. It therefore requires a high degree of institutional agility.

The implementation process comprises two phases: (1) the establishment of governance, legal, and policy frameworks, combined with capacity development where required; and (2) the operationalization of these frameworks through effective enforcement. The first phase centers on the development of strategic-level policy and legal instruments, whereas the second focuses on strengthening institutional capacities, refining business processes, and embedding sustainable practices.

<sup>15</sup> [https://dspace.nplg.gov.ge/bitstream/1234/319364/1/Compendium\\_Of\\_Policy\\_Briefs\\_2019\\_October.pdf](https://dspace.nplg.gov.ge/bitstream/1234/319364/1/Compendium_Of_Policy_Briefs_2019_October.pdf) Accessed 23.04.2026.

<sup>16</sup> <https://globalinitiative.net/wp-content/uploads/2025/08/Alexander-Kupatadze-Den-of-thieves-Mapping-organized-crime-in-the-South-Caucasus-GI-TOC-August-2025-1.pdf> Accessed 23.04.2026.



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This chapter examines the approaches taken by Moldovan and Georgian authorities in handling the preparation, coordination, and fulfilment of the VLAP, and explores issues related to institutional architecture and business processes at the political, tactical, and operational levels. As the primary audience of the report is the Ministry of Internal Affairs of Armenia, it provides more detailed insights into the corresponding processes within the Ministries of Internal Affairs of Moldova and Georgia. In addition, particular focus is placed on key factors directly affecting the success of VLAP implementation, such as relations with donors and strategic communication.

### 4.2. Institutional Organization of the VLAP Implementation in Georgia

In the Georgian context, the VLAP was broadly perceived not as a stand-alone initiative, but as a continuation of a sustained trajectory of European integration spanning more than a decade. The implementation process coincided with the finalization of the EU-Georgia Association Agreement (AA) and a broader intensification of reforms aligned with the EU standards, thereby reinforcing the perception of the VLAP as an integral component of Georgia's strategic Europeanisation process.

Against this backdrop, the Government of Georgia relied *inter alia* on pre-existing institutional arrangements established for the coordination of EU integration, such as the Office of the State Minister of Georgia on European and Euro-Atlantic Integration,<sup>17</sup> the government's EU integration commission.<sup>18</sup> At the same time, given the technical specificity and cross-sectoral nature of VLAP benchmarks, the government introduced additional *ad hoc* coordination mechanisms and mobilized additional administrative and financial resources, including both budgetary and donor funds, to ensure targeted and results-oriented delivery.

**Institutionally, the process was organized into three layers.** The strategic, political level was run by the Government Commission for the Integration of Georgia into the European Union (GCIGEU), chaired by the prime minister. The State Minister of Georgia on European and Euro-Atlantic Integration and the Minister of Foreign Affairs served as deputy chairpersons. The commission provided political guidance, planning, resource allocation, and oversight of developments. Meetings were held on a quarterly basis. **The main advantage of the commission was that, besides ministers and the Secretary of the National Security Council, chairpersons of four essential parliamentary committees (EU Integration, Legal Affairs, International Affairs, Economic Policy) were its members.** That guaranteed a strong nexus between the parliament and the executive branch and facilitated the acceleration of the legislative process whenever it was necessary.

To ensure the effective implementation of strategic decisions adopted by GCIGEU, a cross-governmental plan for implementing the VLAP benchmarks was developed in consultation with EU representatives and subsequently approved by the government. The plan determined a set of activities, performance indicators, timelines, and responsible institutions, ensuring coordinated delivery and measurable progress across the government. This document presented a

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<sup>17</sup> The Office of the Minister of Euro-Atlantic Integration existed in Georgia from 2005 to 2018. See official government decree, available on Georgian: <https://www.matsne.gov.ge/document/view/10948?publication=0> Accessed 23.04.2026.

<sup>18</sup> EU integration commission on the government level has been operational since 2004. See official government decree, available on Georgian: <https://www.matsne.gov.ge/ka/document/view/11050?publication=0> Accessed 23.04.2026.

comprehensive framework, structured in a format familiar to Georgian political leadership and public administration officials, to ensure clear understanding and ease of use. Although the plan was an effective instrument for advancing VLAP reforms and facilitating structured monitoring, Georgian civil society remained critical.<sup>19</sup> This was largely due to their limited involvement in the planning process, which constrained their ability to effectively influence the government’s interpretation of VLAP requirements.

Under GCIGEU’s strategic guidance and oversight the **interagency coordination** was structured and entrusted to the special working group<sup>20</sup> composed of deputy ministers of line ministers.<sup>21</sup> The working group was chaired by a Deputy Minister of Foreign Affairs. The Euro-Integration Department of the Ministry of Foreign Affairs acted as the secretariat and the key driver of the working group. In addition, the Ministry of Foreign Affairs also acted as a key negotiator with EU institutions. **Despite a horizontal model of coordination, these formal mechanisms, supported by strong internal capacities and embedded institutional expertise, enabled the Ministry of Foreign Affairs to productively exercise a central coordinating role in the process.** This function was carried out through weekly in-depth briefings and progress review meetings, which reinforced accountability across contributing line ministries.<sup>22</sup>

**Operational-level management** was carried out by the relevant ministries, other state institutions, and *ad hoc* bodies. The implementation activities were led mainly by heads of departments or specifically designated officials. In cross-sectoral domains, such as migration and combating organized crime, dedicated interagency commissions were established, composed of ministers and/or deputy ministers.

	PRIMARY ACTORS	CORE MANDATE	OPERATING CADENCE
Layer 1: Strategic & Political	PM, GCIGEU, Parliamentary Chairs	Political guidance, planning & resource allocation	Quarterly & Ad hoc
Layer 2: Interagency Coordination	Interagency Working Group under the Ministry of Foreign Affairs	Internal coordination, EU negotiation & Strategic communication	Weekly progress reviews & Ad hoc
Layer 3: Operational Management	Depts of the line ministries, Interagency Commissions	On-the-ground execution & cross- sector management	Continuous / As required

**Figure 1. Institutional Architecture for VLAP Implementation in Georgia**

<sup>19</sup> <https://www.scribd.com/document/207091679/Analysis-of-the-Visa-liberalization-Process-in-Georgia-Moldova-s-Experience-and-Recommendations> Accessed 23.04.2026.

<sup>20</sup> <https://matsne.gov.ge/ka/document/view/2651018?publication=0> Accessed 23.04.2026.

<sup>21</sup> According to Georgian governance traditions, deputy ministers are not politicians, but either senior career civil service professionals or high-level technocrats administering particular dimensions under the overall direction and leadership of the ministers, assisting them to run the institutions.

<sup>22</sup> Interview with Mariam Rakviashvili, Deputy State Minister of Georgia on European and Euro-Atlantic Integration.



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Despite such mobilization, the process initially followed a routine course of action, with government officials implementing VLAP activities as a part of their regular duties alongside other tasks. Civil society organizations closely following the action quickly raised concerns.<sup>23</sup> The Ministry of Foreign Affairs played a crucial role in ensuring prioritization of the VLAP agenda across the government.

**The Ministry of Internal Affairs of Georgia (MIAG) was responsible for the advancement of a large portion of requirements.** At the time, as in many post-Soviet states, it was regarded as one of the core government institutions, with a broad mandate encompassing public safety, traffic enforcement, police services, border management and coast guard, security and counterintelligence, combating organized crime and terrorism, emergency management, and the protection of the administrative line with Georgia's occupied territories. The large number of operational tasks and emerging challenges left little room for development. Nevertheless, **the International Relations Department (IRD) of the MIAG**, supported by the Reforms and Development Agency, a dedicated strategic planning unit responsible for advancing reforms under the Ministry's authority, played a leading role during the first phase, when VLAP efforts were primarily focused on drafting relevant legislative acts and policy frameworks. For example, the Law on International Law Enforcement Cooperation,<sup>24</sup> the State Border Management Strategy and Action Plan for 2014-2018,<sup>25</sup> the concept of the Establishment of the Migration Department and other landmark documents had been developed.<sup>26</sup> They were drafted mainly by own resources but still with tailored international assistance.

At the subsequent stage, as the focus shifted to the practical execution of policies and legal frameworks, such as the integrated border management strategy, the legislation addressing irregular migration management, etc., it unfolded a need for more active engagement of various structural units of the MIAG and stronger donor support as well. This triggered the introduction of an effective coordination mechanism that was amplified with accountability measures. Accordingly, the Ministry had to prioritize VLAP implementation and ensure that this priority was clearly understood and consistently reflected in the actions of all key officials. The Minister issued an order in September 2014 adopting special rules for coordinating and enhancing VLAP implementation efforts within the MIAG.

**According to the ministerial order, the IRD was empowered with a considerable extra mandate to coordinate activities within the ministry.** A dedicated VLAP task group was established within the MIAG, comprising dedicated IRD staffers and senior officials from the departments responsible for VLAP-related reforms, to ensure daily planning and implementation of activities. The IRD was tasked to establish internal, thematic working groups and elaborate a detailed enforcement program for each VLAP benchmark falling under the responsibility of MIAG, based on the activities set by the national plan. In addition, officials were designated within each structural unit to proceed with planned activities and to report regularly to the IRD. The latter was mandated to conduct awareness-raising meetings and briefings with relevant officials across the MIAG and inform them about the planned actions, EU standards in concerned areas, VLAP

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<sup>23</sup> <https://www.scribd.com/document/207091679/Analysis-of-the-Visa-liberalization-Process-in-Georgia-Moldova-s-Experience-and-Recommendations> Accessed 23.04.2026.

<sup>24</sup> <https://www.matsne.gov.ge/en/document/view/2048477?publication=2> Accessed 23.04.2026.

<sup>25</sup> <https://www.matsne.gov.ge/ka/document/view/2279821?publication=0> Accessed 23.04.2026.

<sup>26</sup> <https://www.matsne.gov.ge/ka/document/view/2432928?publication=0> Accessed 23.04.2026.

benchmarks, and their obligations in this process. All senior officials were made clearly aware that any neglect or inadequate implementation of VLAP-related activities would have significant administrative consequences. The minister was personally briefed about the progress on a monthly basis. Such an arrangement ensured that political leadership and technocratic resources were harnessed, which made a huge positive impact on the traditionally conservative workforce of the ministry.<sup>27</sup>

One of the problems that emerged during the process was related to language barriers. The limited foreign language proficiency across units of the MIAG placed a disproportionate burden on the IRD, which assumed primary responsibility for interpreting, translating, and communicating relevant materials to support practical activities for the implementation of relevant VLAP requirements.<sup>28</sup>

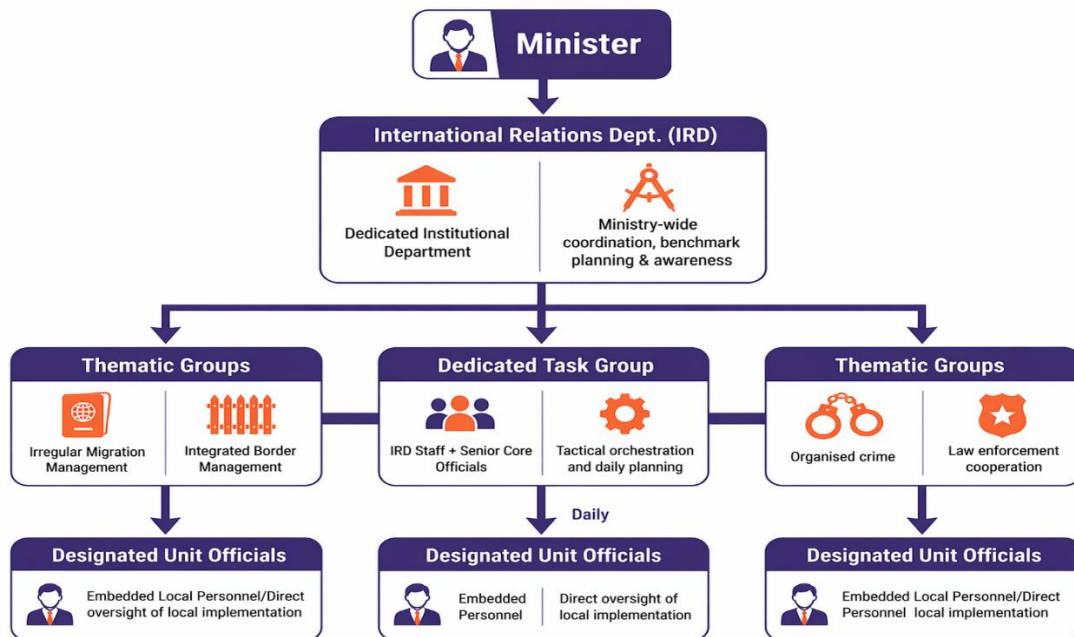


Figure 2. The VLAP implementation structure in MIAG

In the pre-VLAP period, the MIAG invested substantial resources in technological development, the digitalization of business processes and databases<sup>29</sup>, and the establishment of a highly capable in-house information and communication technology (ICT) team, including software development and technical support functions. As a result, the Ministry largely relied on its own human resources and strong ICT capabilities to implement digitalization and other technical components envisaged under the VLAP, without resorting to outsourcing.

<sup>27</sup> Interview with Miranda Khabazi, former head of VLAP task group under the IRD

<sup>28</sup> Ibid.

<sup>29</sup> In this report, the term “digitalization,” unless otherwise specified, refers to the digitalization of databases and business processes.



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The situation with resource allocation was relatively easy during the first phase, when policy and legal frameworks were drafted. However, when it came to the practical application, more targeted donor assistance was required to meet the specific VLAP benchmarks, especially in the fields requiring specialized expertise and financial support.

**Engagement with donors and international partners** represented a substantial part of the VLAP implementation process. Even though the government generally facilitated it on the national level, the crucial dimension of the donor cooperation flew on the sectoral level. Line ministries and interagency commissions operated sectoral coordination mechanisms with respective donor communities, supported by the political endorsement of the government and strategic advocacy by the government administration, the Ministry of Foreign Affairs and the Office of the State Minister for European and Euro-Atlantic Integration.

One of the most effective sector-specific donor coordination models was elaborated by the MIAG. The IRD, in collaboration with the representatives of each structural unit of the ministry, conducted a comprehensive needs assessment, identifying resource gaps with insufficient human and technical capacity. For example, border and migration management was identified as the dimension where international support was urgently needed (expertise, equipment, etc.). Following the needs assessment, the IRD launched a proactive, coordinated, and transparent donor collaboration process, which was unusual for a traditionally careful and closed institution.

First donor coordination meetings were held in 2013 and 2014, during which senior MIAG officials presented completed reforms, ongoing activities, and the strategic vision for future developments in border management, a priority area for the MIAG at that time.<sup>30</sup> The initiative proved itself so successful that it was transformed into a permanent platform for donor cooperation and was held annually in all subsequent years.

The Georgian approach to donor engagement prioritized the development of domestic capacity and the sustainability of interventions aimed at advancing broader reforms and strategic initiatives, rather than seeking support to address specific problems or stand-alone issues arising from VLAP requirements. Consequently, in some cases, donor assistance was structured around large-scale reforms, within which the specific VLAP requirement constituted only part of the process.

The EU supported Georgian institutions significantly through several mechanisms: Grants, TAIEX initiatives, Twinning Projects, Technical Assistance projects, etc. Georgia's international partners had a strong presence in Tbilisi at that time, supporting the government, civil society, vulnerable groups, and various ecosystems. Such a high level of activity occasionally resulted in overlapping initiatives, with similar projects implemented across different stakeholders or under parallel frameworks. Donor cooperation conferences enabled government institutions, through ardent sharing of strategic insights about delivered progress and a comprehensive plan of action, to proactively ensure clear situational awareness within the donor community. That helped to avoid

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<sup>30</sup> <https://mia.police.ge/en/shinagan-saqmeta-saministroshi-donorta-koveltliuri-sakoordinatsio-shekhvedra-gaimarta/7273>  
Accessed 23.04.2026.



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overlaps and strengthen a sense of ownership among donors about concrete problems and achievements.

**Strategic communication** emerged as a key area of donor support. On 6 September 2013, the government adopted the Strategy of the Government of Georgia on Communication and Information on European Integration Issues for 2014–2017. Even though the Georgian population was largely supportive of EU integration, the strategy envisaged communication with the population in Georgia, as well as with targeted audiences in selected EU Member States. Annual and biannual action plans were adopted or updated based on analysis of the evolving information environment. The Office of the Minister on European and Euro-Atlantic Integration was responsible for the implementation of these plans in coordination with the Ministry of Foreign Affairs and other line ministries. The Office primarily utilized the NATO & EU Info Center, a dedicated organization under its auspices, for awareness-raising on NATO and EU integration processes. Although the strategic communication campaign addressed different issues at various stages of the VLAP process, it generally focused on three main areas: (1) the realistic understanding of EU integration for Georgia as a country; (2) the opportunities visa-free travel offers to Georgian citizens; and (3) the rules and requirements with which Georgian citizens must comply in order to use the visa-free regime properly. Communication efforts included large-scale advertising campaigns on television and social media, as well as extensive engagement with business leaders, regional communities, populations in remote settlements, and ethnic minorities, involving members of the government, senior officials, and opinion leaders.<sup>31</sup>

**Civil society participation** in the VLAP implementation process in Georgia was broadly inclusive and grounded in close cooperation on the national level, albeit less formalized than in Moldova. It was characterized by differentiated approaches across the various VLAP blocks, reflecting institutional specificities and sectoral dynamics.

At the central coordination level, the approach led by the Ministry of Foreign Affairs was notably open and inclusive, ensuring regular engagement with thematic civil society organizations and experts. This engagement extended beyond the presentation of progress and included substantive thematic discussions, consultation processes, and the exchange of expertise. The State Commission on Migration Issues institutionalized the participation of relevant CSOs as regular contributors to its work through advisory platforms, thereby fostering a more structured and participatory dialogue.

In contrast, the approach adopted by the Ministry of Internal Affairs was comparatively less regular and more limited, reflecting the traditionally conservative nature of the law enforcement and security institutional culture. Nevertheless, through a series of workshops, meetings, and events, largely facilitated by international partners, information on reform progress was shared with civil society actors. This contributed to maintaining an adequate level of awareness among civil society actors, thereby supporting informed inputs to EU assessment missions and accurate reflection of reform progress.

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<sup>31</sup> Interview with Mariam Rakviashvili, former deputy of the State Minister of Georgia on European and Euro-Atlantic Integration.



### 4.3. Institutional Organization of the VLAP Implementation in the Republic of Moldova

Moldova was the first country within the Eastern Partnership initiative to receive the VLAP, which differed from the Balkan Visa Liberalization Roadmaps.<sup>32</sup> It required significant efforts, including the adoption or adjustment of legislation to EU standards, the development of institutional capabilities and human resources, the drafting of Standard Operating Procedures (SOPs), the build-up of new units and structures, and the initiation of EU-funded projects for experience sharing and legislative harmonization. Accordingly, it was regarded as the most ambitious and challenging project at that stage. From an organizational perspective, the coordination of the VLAP implementation process at the national level was structured across several levels and involved ad hoc institutional arrangements.

**The strategic guidance at the national level** was provided by the Government Committee for European Integration, comprising of the members of the Cabinet of Ministers, led by the Prime Minister. **A dedicated inter-institutional coordination body across the government**, the Visa Task Force, was established under the leadership of the Ministry of Foreign Affairs and European Integration (MFAEUI) and chaired by the Deputy Prime Minister, Minister of Foreign Affairs and European Integration. The MFAEUI operated as a coordinating agency of the Visa Task Force, involving senior officials of other line ministries and major government agencies as members. In addition, the Visa Task Force served as a platform for dialogue and cooperation with civil society whenever it was necessary. **At the operational level**, all government agencies involved in VLAP implementation established internal working groups. Within each implementing institution, there was a designated coordinator and sectoral working groups.

At the parliamentary level, the legislative process was coordinated by the Parliamentary Committee on Foreign Policy and European Integration. Synergy between the executive and legislative branches was ensured throughout the political leadership. All legislative acts considered as EU VLAP requirements were submitted to the Government and Parliament for approval with priority status.

The implementation of the VLAP progressed alongside routine responsibilities of the institutions, while simultaneously advancing the expansion of departments responsible for international relations and external assistance projects. Due to the scarce resources and lack of administrative capacity of Moldovan institutions, the VLAP implementation was supported by EU advisers delegated to the Ministry of Internal Affairs and the Customs Service within the EUHLPAM Mission, supported by the EU to provide a clearer understanding of the EU standards and accelerate the processes.<sup>33</sup>

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<sup>32</sup> [https://ec.europa.eu/commission/presscorner/detail/pl/qanda\\_22\\_7412](https://ec.europa.eu/commission/presscorner/detail/pl/qanda_22_7412) Accessed 23.04.2026.

<sup>33</sup> [https://info.undp.org/docs/pdc/Documents/MDA/00066568\\_ProDoc%20EUHLPAM.pdf](https://info.undp.org/docs/pdc/Documents/MDA/00066568_ProDoc%20EUHLPAM.pdf) Accessed 23.04.2026.

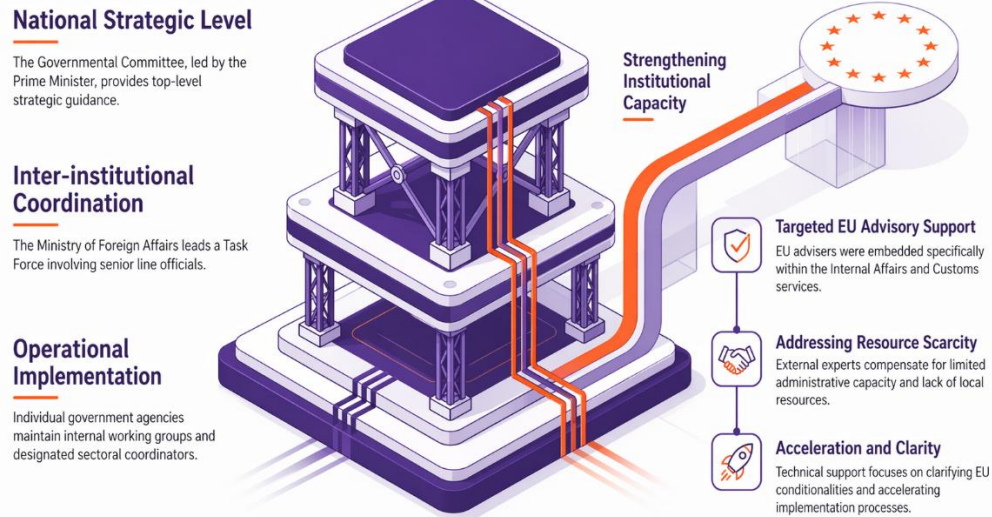


Figure 3. Institutional Architecture for VLAP Implementation in Moldova

At the outset of the process, the Government adopted an internal Action Plan to ensure coherence and effective VLAP implementation. It served as a comprehensive framework, detailing the activities required to achieve VLAP benchmarks, accompanied by defined indicators and designated responsible institutions.

In practice, as interagency cooperation mainly relied on horizontal coordination under the MFAEUI, certain challenges in terms of effectiveness and timeliness were identified by civil society. These included weak coordination and instances of institutional competition among government entities.<sup>34</sup> At the same time, political processes within the ruling coalition negatively impacted the delivery of some reforms, particularly those with broader political implications, such as anti-discrimination and anti-corruption legislation.<sup>35</sup> Ultimately, the Government of Moldova ensured the consolidation of political will and technocratic capacity to advance progress. The Visa Task Force played a decisive role in strengthening coordination and overall performance across government institutions.

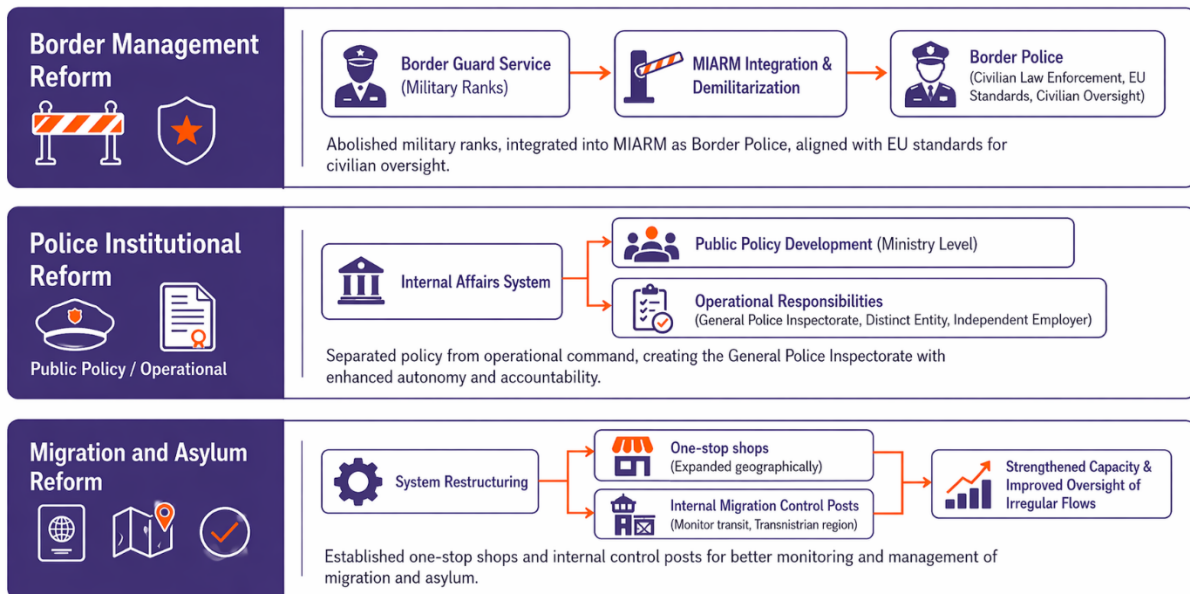
**Within the Ministry of Internal Affairs of the Republic of Moldova (MIARM),** a dedicated Working Group on visa liberalization was established to coordinate the Ministry’s extensive role in the process, as it was responsible for approximately 70% of VLAP benchmarks. The working group operated under the leadership of the Minister of Internal Affairs, who, for the first time in the history of Moldova, was a civilian rather than a uniformed policeman. Given the central role of the MIARM in the implementation of the VLAP, its representatives participated in all national-level interinstitutional working groups, ensuring coherent development, institutional alignment, and effective coordination of cross-cutting issues across the VLAP framework.

<sup>34</sup> <https://www.scribd.com/document/207091679/Analysis-of-the-Visa-liberalization-Process-in-Georgia-Moldova-s-Experience-and-Recommendations> Accessed 23.04.2026.

<sup>35</sup> <https://www.batory.org.pl/upload/files/Programy%20operacyjne/Otwarta%20Europa/Moldova%20success%20story%20-%20policy%20paper%20-%20SBF%20IWP.pdf> Accessed 23.04.2026.

The VLAP Working group of the MIARM involved all relevant central Apparatus divisions, including the Police, the Border Police, the Bureau for Migration and Asylum (BMA) at that time, the Information Technology Service, Police Academy and **the General Directorate for International Relations and European Integration (DGRIIE)**, as the central coordinating body. As a clear indication of the process’s high priority, working group meetings were attended by the respective deputy ministers or state secretaries responsible for police, border police, migration, and asylum.

Despite a series of reforms undertaken in the internal affairs domain prior to the VLAP, including the reform of the Border Police and the General Police Inspectorate, as well as modernization in the migration and asylum systems (see *Figure 4 for an overview*), additional efforts were required to strengthen institutional coordination and strategic direction. To address these gaps, the DGRIIE was entrusted with assuming a central coordinating role, ensuring structured intra-agency cooperation and providing clear guidance for implementation. In this capacity, it facilitated alignment across relevant units and supported the coherent advancement of VLAP-related reforms.



**Figure 4. Overview of key reforms in the internal affairs domain of the Republic of Moldova prior to VLAP implementation**

**To ensure the DGRIIE’s full coordination capacity**, the DGRIIE team was required to participate in all VLAP meetings, irrespective of whether high-level decision-makers from the MIARM were in attendance, both domestically and abroad. To further enhance coordination within the Ministry, dedicated international relations units were established within key central departments involved in the VLAP implementation, such as the Police, Border Police, and the Bureau for Migration and Asylum. This institutional arrangement improved internal communication, reporting practices, and overall performance. Moreover, to reinforce accountability, the DGRIIE reported directly to the Minister of Internal Affairs on a weekly basis, thereby strengthening its authority to oversee



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and coordinate the activities of other units. The heads of structural units concerned by the VLAP were personally involved in both carrying out activities and reporting. Any delays fell under the direct oversight of the Minister.

To strengthen the capacities of the MIARM team responsible for VLAP implementation, regular consultation and explanatory meetings were held both internally within the ministry and in coordination with the MFAEUI. Communication between the MIARM and the MFAEUI was direct and continuous across all levels, including ministerial, deputy ministerial, and expert levels.

The VLAP-related materials were mostly available in Romanian, as Romania had already been a member of the EU and the EU legislation and related materials had largely been translated. However, English remained as a main working language that caused practical challenges within the MIARM and the staff of the DGIREU was overburdened by translation of documents for structural units where English was rarely spoken, which created significant time and workload pressures. To accelerate language acquisition and address the problem, the MIARM launched free, intensive English language courses with donor support. Another challenge in Moldova was the dual translation system, which required legislation to be translated not only into Romanian but also into Russian.

**To secure external support for the fulfilment of VLAP requirements**, the DGRRIE established a Donor Coordination Meeting platform and developed a comprehensive matrix of external assistance, capturing both ongoing support and identified needs. The Donor Coordination Meeting brought together donors, development partners, diplomats, international organizations, and police liaison officers from EU Member States, providing a forum to present progress on the one hand and outline outstanding needs on the other. These meetings were held regularly, but no less than twice a year.

The DGRRIE actively leveraged EU-funded instruments and programs, including TAIEX (providing expertise, study visits, and workshops), Twinning, and subsequently Budget Support. This engagement facilitated access to financial assistance while also enhancing institutional capacity for resource mobilization and the effective absorption of European funds.

**The Strategic communication campaign** was an integral part of the VLAP implementation in Moldova. It was conducted in accordance with the communication strategy adopted by the Government. Even though the population in Moldova had a generally positive attitude towards Visa-Free Travel with the EU, anti-European sentiments were considerably strong<sup>36</sup> and the government had to address them. The communication campaign, at the same time, addressed traditional VLAP-related problems, such as explaining rules and requirements for Moldovan citizens to enjoy Visa-Free Travel properly and promoted a positive image of the EU. A variety of public relations techniques were applied by the Government, including public meetings, advertising campaigns and Europe Day celebrations. EU symbols were widely used by the government in official settings to reinforce a sense of belonging to the EU community and to increase the visibility of EU integration in everyday life. A key strength of the strategic

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<sup>36</sup> <https://www.scribd.com/document/207091679/Analysis-of-the-Visa-liberalization-Process-in-Georgia-Moldova-s-Experience-and-Recommendations> Accessed 23.04.2026.



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communication effort lay in the active participation of motivated young and mid-career professionals in VLAP implementation, who were well placed to communicate its benefits effectively.<sup>37</sup>

**The engagement of civil society actors** in the VLAP implementation process in Moldova constituted an important pillar of transparency, accountability, and good governance. Structured collaboration was established through formal and informal partnership arrangements with civil society, characterized by a domain-specific approach, whereby relevant CSOs were identified and involved in accordance with their areas of specialization across the VLAP pillars. The Visa Task Force itself was widely used as a platform for high-level, institutionalized dialogue between the government and civil society.

The MIARM demonstrated openness to civil society expertise by appointing, for the first time, the director of a non-governmental organization specializing in anti-trafficking as the head of the Centre for Combating Trafficking in Human Beings. In addition, civil society experts were engaged as advisers to the minister in areas such as reform and strategic communication, reflecting a practice of integrating external expertise into policymaking processes.

Throughout the VLAP implementation period, civil society actors demonstrated a high level of preparedness, subject-matter expertise and readiness for cooperation with the public sector based on shared values. Their involvement contributed to informed and credible inputs to the EU assessment missions, supporting a well-rounded understanding of reform developments.

### 4.4. Comparative Assessment

The Moldovan and Georgian experience with the organization of VLAP implementation reveals significant similarities in institutional frameworks, challenges, and solutions that may be relevant for Armenian stakeholders.

#### **The study demonstrates the following key similarities in Georgia and Moldova:**

- Governments ensured a strong nexus between political leadership and technocratic resources through an *ad hoc* chain of command, where politicians played the role of enablers, while technocrats played the role of drivers. Such an approach ensured the prioritization of strategic tasks, their translation into coordinated policy planning, subsequent execution, and continuous monitoring, reporting and adjustment at the operational level, beyond traditional governance channels.
- Interagency coordination at the national level was led by the Ministry of Foreign Affairs/Ministry of Foreign Affairs and European Integration, which at the same time served as a key negotiator with the EU institutions.
- National-level Action Plans were developed to operationalize VLAP benchmarks by transposing broadly formulated provisions into concrete, measurable actions and deliverables, and to design a clear and transparent roadmap. This facilitated more structured coordination, clearer allocation of responsibilities, mobilization of resources,

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<sup>37</sup> Interviews with former officials from DGRIIE of MIARM involved in the VLAP coordination and implementation process



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and more effective implementation across the public administration. The Action Plans were formally adopted by the governments, thus granting high legitimacy.

- On the Ministry of Internal Affairs level certain problems were observed at the initial stage of the implementation of VLAP, until extraordinary resource mobilization, capacity building, awareness raising and accountability measures took effect.
- In the MIAG and MIARM, leadership granted extraordinary functions to structural units responsible for international relations to take leading roles in the process. They provided planning, coordination, awareness raising and monitoring of the implementation, sometimes even directly engaged in the implementation of the activities.
- The MIAG and the MIARM provided digitalization services through in-house ICT resources, did not outsource and depended on other government agencies or private entities. This approach ensured effective, timely and secure progress in the digitalization processes.
- Government institutions at the national and sectoral levels established donor coordination platforms and engaged in proactive, coordinated and transparent communication with international partners to ensure comprehensive and consistent support, avoid overlaps, and maximize effectiveness, by sharing information about the VLAP implementation process and providing updates.
- Governments adopted national-level communication strategies at the initial stage of VLAP implementation and planned and carried out large-scale information campaigns tailored to the information environment throughout the VLAP implementation period.
- Despite different advantages, Georgia (strong institutions) and Moldova (significant international support, materials available in Romanian) had, at the moment of handover of their VLAPs, donor support still was vital for successful implementation. Governments ensured structured engagement with civil society actors through providing regular information-sharing on reform progress on national and sectoral levels, thereby supporting well-informed contributions by CSOs to EU assessment missions in their role as independent sources of information. Civil society conducted a close monitoring of the whole process and openly criticized governments for shortcomings.

### **At the same time, the following main differences are identified in Moldovan and Georgian practices:**

- In Georgia, chairpersons of parliamentary committees were members of CIGEU that streamlined the lawmaking process, which constituted one of the core implementation mechanisms, especially in phase 1.
- In Moldova, the interagency coordination platform - the Visa Task Force- was multidimensional and inclusive as it involved a wide range of officials at different levels and was used as a formal dialogue format with various stakeholders and the civil society community. While in Georgia, such an interagency mechanism comprised of deputy ministers and pursued more administrative goals and collaboration with civil society was delegated to the secretariat – the Ministry of Foreign Affairs.
- The reforms undertaken within the VLAP framework in Georgia were not limited to compliance with objectives, rather, they served as a catalyst for the continuation and



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deepening of broader institutional reforms, reinforcing capabilities, coordination mechanisms, and service delivery standards.

- In Moldova, the DGRIFE was supported by a chain of identical units within line departments/subordinate entities of the MIARM, which created a network that served as a key driver of the reforms. Significant donor support was allocated for boosting the capacity of the DGRIFE itself and similar units, in particular, the establishment of a dedicated unit in charge of accessing and implementing projects within the DGRIFE for the first time.
- In the MIAG, coordination was institutionalized to a lesser extent. Although the IRD led the implementation process with a strong, formal mandate, it relied mainly on collaboration with selected champions from other departments and entities rather than a network of formal units. In Georgia, strong emphasis was placed on capacity building of identified champions within relevant MIAG departments involved in VLAP implementation
- In Moldova, cooperation between the MIARM and civil society was more formalized, ensuring transparent and structured interaction with CSOs. This strengthened accountability and positively impacted the dialogue with EU institutions. At the same time, the MIARM demonstrated a more open and substantive level of cooperation with civil society representatives compared to the MIAG, where such engagement was not formalized.

Key **strengths** identified across both countries: (1) the establishment of *ad hoc* coordination mechanisms ensured effective synergy between political leadership and technical staff, streamlining administrative processes and facilitating timely decision-making; (2) the development of dedicated national-level action plans proved to be an effective instrument for operationalizing the VLAP within national bureaucracies, translating strategic objectives into concrete, implementable measures; (3) the introduction of national-level strategic communication strategies provided a comprehensive and proactive approach to mitigating information manipulation while fostering broad public support for reforms; (4) proactive and coordinated engagement with civil society and the donor community enhanced inclusiveness, improved transparency, and mobilized additional expertise and resources in support of reform implementation.

Key **weaknesses** unveiled: (1) the need for *ad hoc* institutional arrangements, such as expanding the mandates of international relations units within the Ministries of Internal Affairs, indicates underlying structural limitations and insufficient baseline capacities to effectively drive reforms; (2) continued reliance on donor support raises concerns regarding the long-term sustainability and ownership of reforms, (3) shortcomings related to the language barriers and subsequent *ad hoc* solutions.

## Chapter 5. Document Security

### 5.1. General Overview

Document security is one of the most practical dimensions of the Visa Free Movement and the cornerstone of security from a technical perspective. If other blocks of the VLAP focus more on



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modernization of legal standards, strengthening and refinement of governance processes, building up institutional capacity, the document security puts more stress on the operation of a formidable technical system.

Georgia and Moldova had to provide considerable work to meet VLAP benchmarks in this domain. Both countries experienced specific problems in identity management of individuals residing in the breakaway region of Transnistria, the Occupied Territories of Abkhazia and Tskhinvali Region. Different practices examined in this chapter demonstrate that there is no universal recipe for ensuring document security standards, and each country should tailor its approach to concrete challenges.

This chapter analyses key aspects of the reforms carried out by Moldovan and Georgian authorities for the modernization of the civil acts registration system and addressing identity management problems inherited from Soviet governance system, also for meeting VLAP Block 1 requirements. It provides information about pre-VLAP status, key developments, country-specific challenges and key solutions.

### 5.2. Document Security Reform in Georgia

#### *Development of the Legal Framework for Document Security*

Long before biometric passports became the central focus of the VLAP implementation process, the Georgian government started restructuring its civil registration architecture to replace a fragmented, paper-based and weakly controlled system with a unified, centralized and electronically managed registry. This process began in 2005 under the Ministry of Justice, initially through the Civil Registry Agency, and was later continued by its successor, the Public Service Development Agency (PSDA).

The legal framework was developed gradually as a part of the reform process several years ahead of the VLAP, mostly during the visa dialogue process. It consisted of the layers of primary legislation, secondary legislation, internal regulations and SoPs of the PSDA. The core legal instruments specifically referred to document security implementation were:

- **Law on Civil Acts' Registration**, later replaced by the **Law on Civil Status Acts**, adopted in December 2011.
- **Law on the Rules of Registration of Georgian Citizens and Foreign Nationals Residing in Georgia and Issuance of ID (Residence) Card and Passport of a Citizen of Georgia.**
- **Order No. 18 of the Minister of Justice** on approval of the rules for civil acts registration.
- **Order/Decree No. 98 of the Minister of Justice** on registration and removal from the register, and on issuance of identity cards, residence permits, passports, travel passports and travel documents.
- **Law on Personal Data Protection**, adopted on 28 December 2011, with most provisions entering into force on 1 May 2012.
- **PSDA Personal Data Protection Policy**, approved in May 2013; and
- Legal acts establishing and regulating the **Personal Data Protection Inspector**.
- Law of Georgia **on Information Security**, 2012



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This legal framework was progressively refined through targeted amendments and practical improvements introduced as the reform advanced. In particular, the results of the digitalization enabled establishing more secure procedures, while building up capabilities for electronic data exchange with other state institutions created conditions for greater efficiency, accuracy and institutional coordination.

Additional amendments obliged all medical institutions nationwide to notify the PSDA electronically of births and deaths within five working days, strengthening the timeliness and reliability of source data entering the register and further supporting the integrity of the civil registration system.

Georgia's framework was also broadened to cover data protection more systematically. The law on Data Protection was revised in 2014, and the amendments strengthened the role and independence of the Personal Data Protection Inspector, widened the scope of supervision, and required that personal data be processed only for explicit and legitimate purposes, with blocking, erasure or destruction where those conditions were not met. Amendments to the Criminal Code in May 2014 also criminalized unlawful collection, storage, use, or disclosure of personal data causing serious damage.

### ***Development of the Institutional Framework for Document Security***

Institutionally, the government consolidated functions that were previously dispersed across different state bodies. Before the reform, the issuance of passports and identity documents fell under the **MIAG**, while the **registration of civil acts** was under the **Ministry of Justice**. The reform brought these functions together within a single institutional system under the Ministry of Justice, thereby uniting civil status registration, population registration, identity documentation and passport issuance within one coordinated framework. This institutional consolidation was a major step in strengthening document security, as it reduced fragmentation and made it possible to build a more coherent and reliable identity management system.

The Civil Registry Agency, and later the PSDA, operated through a nationwide network of territorial offices and consulates connected to a unified database and a single case-management environment. This institutional consolidation made it possible to monitor the full registration-to-document chain within one authority.

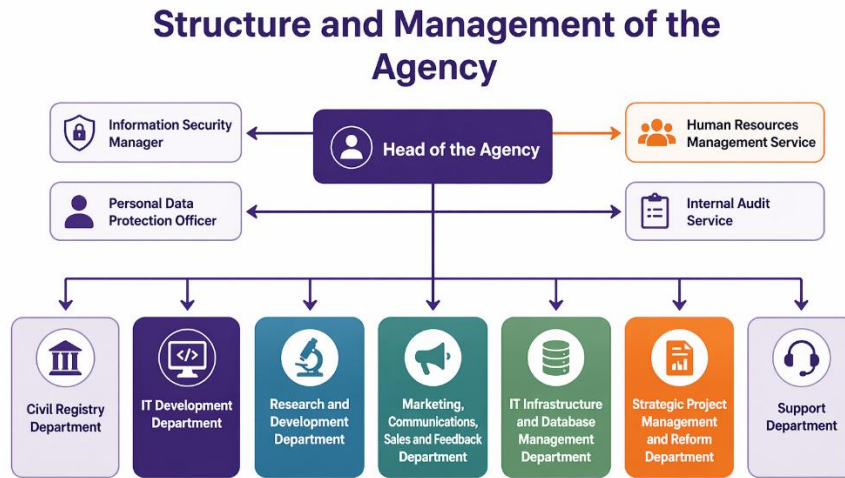


Figure 5. Organogram of the PSDA during the VLAP implementation, 2012-2017

The system was supported by internal audit and monitoring mechanisms. The PSDA established a functioning internal control system covering not only document falsification and breaches of law, but also improper case management and service delivery. Special software tools were used for automated review and control of cases and procedures, and database analysis programs were developed to identify and correct errors.

### Unified Electronic Population Registry

The unified electronic population registry was the central technological pillar of the reform. The government of Georgia launched the reform, establishing the electronic registry in 2005, gradually integrating personal data and related documentation into a single secure system. By 2013–2014, the PSDA held extensive electronic records, including personal data and photographic information, within the registry. Its purpose was to systematize and protect personal information, reduce registration errors, and improve the efficiency and quality of public services.

A key design feature was the use of a **Personal Identification Number (PIN)** as a unique identifier, introduced in 1996 and granted upon birth since 2011. The PIN, as an automatically generated number, has become the first entry point for authorized users searching for a person’s records, enabling access to linked information across databases. This has helped to establish a single verified identity profile per person and created the technical basis for secure interoperability between civil registration and identity document systems.

The registry also relied on full online connectivity across the institution. Legislative and infrastructural changes enabled all PSDA offices to work in real time within a unified database. From 2008, civil registration procedures were gradually digitalized through the introduction of dedicated software applications, allowing case management to move from locally maintained paper-based systems to a centralized electronic workflow. This shift was important for reducing



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double registration, mechanical errors, duplicate identities, inconsistent data entries, and discretionary manual processes.

The unified database subsequently served as the foundation for the operation of data processing and analytical systems across other state institutions, including in the areas of border control, law enforcement, and pension administration.

### **Digitization of Civil Acts**

One of the key lessons from Georgia's experience is that the digitization of civil acts was approached not simply as archival modernization, but as an important document-security measure.<sup>38</sup> The reform unfolded in two main layers. First, from 2007 backwards, large volumes of legacy paper-based records, including birth and death records and photographs, were scanned and incorporated into the electronic population registry. By 2009, the registry already contained more than 4 million entries, turning older records into searchable and verifiable electronic data.

Second, from 2008 onwards, newly registered civil acts and certificates were created and stored electronically in the unified PSDA database. This made it possible, inter alia, to assign a PIN at birth registration (since 2011). Personal data used in civil acts could also be imported from other databases, including identity-document databases, which reduced manual entry, lowered the risk of mechanical error, and strengthened accuracy, consistency, and protection against repeated registration or falsification. Because these records became accessible to territorial offices, consulates, and other authorized institutions, digitization also improved checks across the system.

The digitization of pre-2008 handwritten civil act records remained a major follow-up priority. By 2014, a significant share of birth, death, marriage, divorce, and surname-change records had already been digitized, and the PSDA later adopted a staged, resourced, and time-bound plan to complete the remaining archival work by December 2024. This process ensured that identity-document issuance increasingly relied on civil status data available in the electronic system and enabled authorized officials to review linked personal records in real time, thereby strengthening the reliability and security of document issuance.

The reform also changed the security concept for civil status certificates. Whereas such certificates had earlier status of "documents of strict record", by 2012, they were issued on exclusive watermark paper while electronic copies remained stored in the system, and their validity could be verified online within the PSDA environment. This marked a broader shift from reliance on physical paper security alone toward electronic traceability and system-based verification.<sup>39</sup>

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<sup>38</sup> Interview with Mamuka Samkharadze, Former Deputy Chairperson of the PSDA and Director of the Database and IT Infrastructure Management Department.

<sup>39</sup> Interview with Mamuka Samkharadze, Former Deputy Chairperson of the Public Service Development Agency and Director of the Database and IT Infrastructure Management Department.



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At the same time, data protection and information security were treated as integral parts of document-security reform. In the Georgian approach, the integrity of the document chain depended not only on accurate civil registration data, but also on secure management of the wider information environment. Overall, the system's integrity was reinforced through mutually supporting measures, including electronic identity verification, controlled and separated workflows, secure stock management, traceable delivery and activation procedures, and legal and technical barriers against multiple valid documents being held by one person.

### **International Context of the Reforms**

From the early pre-dialogue stage, Georgia was using the **EU-Georgia ENP Action Plan**, the **Justice, Freedom and Security Subcommittee**, the **Visa Facilitation and Readmission Joint Committees**, and the **EU-Georgia Mobility Partnership** as frameworks for continuous communication with the European Commission and Member States on visa-related reforms, including document security. Updates were prepared and shared regularly with the Commission and EU Member States to demonstrate progress and receive recommendations for further coordinated action.

This structured political and technical dialogue was complemented by **expert assessment missions** and direct exchanges with EU member state experts. They were sent on a mission to review the document security benchmarks, and assess the legal, institutional and organizational framework for biometric passports and related breeder documents.

Georgia consistently framed its reform process as one undertaken **in close cooperation with the Commission and the EU Member States**. So-called non-papers (reports) were exchanged with the Commission and Member States to regularly demonstrate progress and consider recommendations for further coordinated action. In practice, this meant that the Georgian side updated and re-shared its block-structured reform material, including document-security developments, as the visa dialogue evolved.

### **Development of the Legal and Institutional Framework for the Issuance of Machine-readable Biometric Passports**

Georgia's biometric passport system became secure and reliable after being anchored in the broader reform of civil registration and secure identity management. Issuance increasingly relied on validated civil status records, above all birth registration and other breeder documents, rather than simply reproducing data from older passports or ID cards that could contain errors, duplications, or previously altered personal details. The inherited database of passports and ID cards contained inaccuracies and duplications; therefore, it had to be cleansed and revalidated before being transferred into the new population register. The new system used a stable PIN and a unified electronic civil registry as the authoritative source for subsequent document issuance. As noted earlier, since 2008, civil acts have been stored electronically in the PSDA unified database, with personal data imported automatically, and all territorial units and consulates are able to verify records online. As a result, the risks of falsification and repeated registration were substantially reduced. In practice, this meant that passport issuance was no longer based primarily on the existing document in a person's possession, but on the underlying civil record



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and continuously updated registry data, significantly strengthening the integrity of identity verification at source.

During the issuance process, civil act records were checked online, and any change was immediately reflected in the database, thereby reducing the risk of falsification and strengthening identity verification at source.

Despite the existence of a comprehensive legal framework regulating document security, the VLAP obligations still required a significant revision of the legislation in terms of strengthening technical standards and limiting all opportunities of identity manipulation.

The upgrade of the legal framework for biometric passports in terms of the introduction of new technical standards was carried out through a combination of legislative acts, by-laws, numerous internal regulations and SOPs. A key provision was introduced into the **Law on the Rule of Registration of the Georgian Citizens and Foreign Nationals Residing in Georgia, Issuance of ID Card and Passport of a Citizen of Georgia**, which required that a biometric passport contain a chip storing the holder's facial image, fingerprints and specimen signature. This legislative requirement was complemented by the **Methodological Guidelines and SOPs**, which specified the age from which fingerprints had to be taken, identified which fingers were to be captured, and regulated the cases in which fingerprints would not be taken. The identity manipulation problem was addressed through several legislative amendments to the same **Law on the Rule of Registration of Georgian citizens and Foreign Nationals Residing in Georgia and the issuance of ID Cards and Passports**.

An important element of the legal framework was the protection of the "one person one document" principle, followed since October 2005. Several legal changes reinforced it: (1) the possibility of extending passport validity was removed from the law, (2) a passport is annulled upon expiry rather than prolonged, (3) the earlier possibility of including third persons, such as minor children, in another person's passport was abolished.

Georgia also progressively tightened the rules on second and subsequent passports. By 2014, a written explanation was required for obtaining more than one passport, and additional passports could be issued only in narrowly defined cases, such as visa-related needs or simultaneous travel. Further amendments **limited the validity of the second and each subsequent passport to one year**. These measures ensured that the move toward biometric passports was not undermined by the parallel circulation of multiple valid travel documents for the same person. The framework also evolved to cover diplomatic and service passports, as well as consular issuance abroad.

The identity manipulation problem was further addressed through additional legislative improvements. In 2014, an amendment to the law introduced strict limitations whereby an adult may change their first name or surname only once, except in cases provided for by law. However, it did not fully eliminate the problem, and additional legislative amendments were required to



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further limit such changes.<sup>40</sup> The amendment enacted in 2018 determined even stricter conditions for surname changes, making them possible only in the presence of objective grounds defined by law. From a document security perspective, this represented a significant advancement, as it substantially reduced opportunities for identity manipulation through repeated or unjustified alterations of core civil status data.

### **Roll out of Machine-readable Biometric Passports**

In practice, Georgia began domestically issuing second-generation biometric passports in April 2010, fully compliant with the International Civil Aviation Organization (ICAO) standards and equipped with a contactless electronic storage device containing the biometric photo, signature image and fingerprint data of the holder. The documents also indicated that four fingerprints could be enrolled, with the two best selected for storage, and that fingerprint access was protected through Extended Access Control. The biometric passport system was supported by an online unified electronic database, central verification of civil status data, and three biometric printing centres in Georgia, which together created the technical and institutional basis for secure document issuance.<sup>41</sup>

Although domestic biometric issuance began in 2010, rollout to consulates required further legal and technical preparation. In 2013, this element was still considered under implementation, as the PSDA and the Ministry of Foreign Affairs were preparing the necessary legal amendments and software changes. The decisive step came in 2014, when Parliament adopted amendments enabling biometric passport issuance abroad; these entered into force in July 2014 and established biometric passports as the general rule for Georgian citizens residing abroad, with non-biometric passports allowed only in narrowly defined exceptional cases. This legal commencement date was backed by software development, connectivity of diplomatic missions and consulates to the PSDA database, and the technical capacity to process applications abroad without breaking the integrity of the central system. By that stage, the technical work enabling consular acceptance of biometric passports and e-ID applications, as well as issuance of biometric diplomatic and service passports, had already been largely completed.

At the same time, Georgian authorities implemented a layered phase-out of older passport types. Three generations of passports were in circulation: the oldest “capped” passport issued from 1995 to 2006; the 2006 non-biometric machine-readable passport with improved security features; and the second-generation biometric passport introduced in 2010. The capped passport was considered the weakest format because it used a separately attached stamped photo and allowed validity extension, making it more vulnerable to falsification and less compatible with ICAO requirements. Georgia therefore abolished this type, while allowing remaining documents to expire naturally; later reporting specified that these passports would finally expire in early 2016.

The 2006 non-biometric passport followed a different transition path. It was more secure and ICAO-compliant and therefore was not treated as immediately invalid. Its issuance on Georgian territory stopped in April 2010, but consular posts continued issuing it until the biometric consular regime entered into force in July 2014. These non-biometric passports remained valid

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<sup>40</sup> <https://gip.ge/wp-content/uploads/2019/10/Policy-paper-9-Tatia-Dolidze-.pdf> Accessed 23.04.2026.

<sup>41</sup> Interview with Zurab Magradze, Former Deputy Chairperson and Director of the IT Development Department of the PSDA.



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until 2020 if issued in Georgia and until 2024 if issued abroad. A further tightening measure was later introduced: from 2015, any newly issued non-biometric passport could be issued only in exceptional cases, such as a health-related inability to provide biometric data, and its validity was limited to one year.

Georgian authorities also extended the **biometric rollout to travel documents for non-nationals**. From 2010, biometric travel documents began to be issued not only to Georgian citizens, but also to stateless persons permanently residing in Georgia and to persons with refugee or humanitarian status. The system, therefore, brought these categories into the same security architecture as national biometric passports, rather than leaving them within a weaker or parallel documentation regime. **The broader experience also showed that special-status groups, including the residents of the Occupied Territories of Abkhazia and Tskinali Region, holding status-neutral status travel documents, required specific legal and technical solutions within the wider document-security framework.**

A further practical strength of the Georgian model was that it took account of inclusive secure enrolment. The documents note that difficulties in taking fingerprints from persons unable to physically visit an office were addressed through portable enrolment equipment that allowed biometric capture at home. This was important because a system that cannot accommodate such cases risks creating exceptions that may weaken integrity. Such an approach preserved both accessibility and the security principle that biometric data should be captured through controlled procedures.<sup>42</sup>

Following the legislative amendments adopted in May 2014, the government of Georgia restricted the issuance of non-biometric passports to strictly exceptional cases only, namely where biometric data could not be collected due to a person's health, physical condition or another specifically defined circumstance. From January 2015, the validity of such non-biometric passports was reduced to one year, including in all exceptional cases. This created a clear phase-out path, under which non-biometric passports were to disappear from circulation by January 2025, once all remaining documents had expired or were annulled earlier on other grounds. At the same time, the PSDA actively promoted the transition to biometric documents through incentive campaigns, including a temporary 50% discount on biometric passports, which generated strong uptake. In parallel, broader state efforts to increase access to secure identity documents included reduced-cost and free issuance of ID cards. A further important step was taken in 2016, when Georgia introduced a new electronic data carrier in line with higher ICAO security standards, and passports issued by Georgian authorities advanced from the second generation to third-generation travel documents, including the addition of Supplemental Access Control.

Taken together, Georgia's experience demonstrates that the development and rollout of biometric passports required more than the introduction of a technically advanced document. It depended on the prior consolidation of the civil registry, clear statutory regulation of biometric content, binding operational rules for enrolment, institutional integration between civil

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<sup>42</sup> Ibid.



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registration and passport issuance, a legally defined timetable for domestic and consular rollout, progressive restriction of exceptions, and a carefully managed phase-out of older documents.

The reform became persuasive not because biometric passports existed, but because biometric issuance gradually became the standard channel within a wider, coherent and legally supported identity management system.

### ***Roll out of Machine-readable Travel Documents for the Residents of the Occupied Territories of Abkhazia and Tskhinvali Region***

A distinctive feature of Georgia's document security framework was the introduction of status-neutral identity and travel documents for **persons legally residing in the occupied territories of Abkhazia and Tskhinvali Region who did not hold a Georgian identity document and did not want to accept Georgian citizenship or use Georgian official documents for various reasons**. These instruments were designed to provide access to formal identification and, in the case of the travel document, lawful cross-border mobility, while avoiding any explicit indication of citizenship status. At the same time, they remained embedded in the ordinary state issuance framework and were subject to established procedures for application, verification, decision-making, delivery, archiving, and invalidation. Issuance was based on supporting documents relating both to identity and to lawful residence, including legacy records and, where relevant, documents attesting factual residence in the occupied territories.

For persons born in these regions, identity could also be established through specially developed verification procedures. Applications could be submitted through territorial offices, public service halls, and remote service channels, while in certain cases, authorized representatives could also act on behalf of the applicant. The travel document was not limited to a document number as the only identifier: it contained core personal data, including the holder's name, surname, date and place of birth, sex, photograph, personal number, document number, validity period, and issuing authority. At the same time, citizenship was intentionally not displayed as an ordinary visible status field; instead, the machine-readable zone used a code consistent with the document's status-neutral design. Both the identity card and the travel document were issued for defined periods linked to the holder's age: to persons under 18 years of age for a term of three years, and to persons above 18 years of age for a term of ten years.

The status-neutral travel document was additionally designed as a machine-readable document aligned with the ICAO standards, and, like the Georgian passport, it was treated as a secure document of strict record. Although the document indicated Georgia as the issuing country, this did not alter its status-neutral nature, as the reference served administrative and international operational purposes, including readmission.





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examples and non-standard cases, and strengthened their capacity to apply procedures correctly and in line with the law. The anti-corruption content of these trainings became increasingly explicit. A considerable part of the training reportedly focused on the **probable falsification of identity documents**, as well as the **prevention of and fight against corruption**.<sup>45</sup>

The Internal Audit Division contributed to the training and explained in detail what conduct could amount to falsification of identity documents such as passports and ID cards, and what would instead count as a mechanical error without signs of offence. Training also addressed corruption risk analysis, awareness-raising, the obligation to strictly comply with the law, and the need to avoid misuse of state power.

The PSDA also linked staff integrity to **institutional design** to reduce opportunities for corrupt interaction. The dedicated methodological guidelines approved in **September 2012** clearly separated front-office and back-office functions in the PSDA territorial units. Applications were received by one staff member, while the decision was taken by another person through software-supported allocation. The EU expert mission positively assessed that files were randomly assigned in the back office by software, which reduced the risk of direct collusion and discretionary handling.<sup>46</sup> An important Georgian lesson included that anti-corruption in document security was built into workflow design, not left only to ex post sanctions.

The **Internal Audit Division** played a particularly important role as the enforcement and sanction-related component of the system. The responsibility of the audit service responsible for proactive investigating breaches of substantive and procedural law, document-quality issues and corruption cases, and reporting directly to the head of PSDA, was assessed positively by the EU expert mission. By 2014, the audit service actively cooperated with the Ministry of Justice, the MIAG, the State Prosecutor's Office and the Ministry of Finance on prevention and anti-corruption matters.

Data protection formed the second major pillar of this benchmark. Georgia first created the broader legal basis through the **Law on Personal Data Protection**, adopted in **December 2011** and effective, in most parts, from May **2012**. The law classified biometric information as sensitive personal data. On this basis, the PSDA adopted its own **Personal Data Protection Policy** in **2013**, which was described as the first such internal document in the Georgian public sector. The purpose of the policy was to ensure implementation of the law within the Agency and to foster a culture of data protection in practice. The cooperation was set up with the Personal Data Protection Inspector's Office to identify gaps and improve the policy over time.

Importantly, Georgia did not stop at adopting the data-protection rules; it translated them into internal responsibilities, technical controls and staff training. Since **2013**, the PSDA had appointed a **Personal Data Protection Officer** responsible for coordinating relevant issues. The Agency worked on assigning responsibilities by division, creating catalogues of filing systems, developing notification forms for data subjects, and preparing access policies for electronic databases. Technical measures included network security, an automated backup system, a

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<sup>45</sup> Interview with Zurab Magradze, Former Deputy Chairperson of the PSDA and Director of the IT Development Department.

<sup>46</sup> <https://mfa.gov.ge/pfiles/files/Third-Progress-Report-on-the-Implementation-by-Georgia-of-the-Action-Plan-on-Visa.pdf>  
Accessed 23.04.2026.



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second database, centralized antivirus protection, access logging and the gradual introduction of a **data loss prevention system** to prevent and control data leakage. Training on data protection was also made mandatory in practice.

Dedicated data protection training for PSDA staff was provided, including for top management, central staff and territorial units, on interpretation of the law, institutional responsibilities and practical case handling. The high data-protection standards were not only as a matter of legal compliance, but also as an operational requirement for registry staff. Data-protection issues were also integrated into qualification processes, recruitment-related preparation, and further capacity-building activities across the institution.

Considering the cybersecurity threat environment, the PSDA paid significant attention to information security, reflecting the idea that document security and identity management could not remain credible without a protected information environment. Following the adoption of the national legislative framework on information security in 2012 and the qualification of the PSDA as a critical information infrastructure entity in 2013, the Agency began introducing an Information Security Management System (ISMS) aligned with the requirements of the national information security protocols and ISO 27000 standards. This approach treated information security not as a narrow IT function, but as part of the Agency's overall governance model, based on risk assessment, asset classification, internal policies, defined roles and continuous improvement. Since 2013 the ISMS has been developed continuously. The PSDA introduced a comprehensive internal security framework covering access management, information security, personal data protection, IT governance, and physical safeguards. Access to electronic systems was regulated in accordance with staff roles and responsibilities and supported by formal authorization and oversight procedures. At the same time, technical and organizational measures were put in place to protect electronic data and ensure the secure functioning of critical infrastructure and information systems.

To support the implementation, the Agency established an Information Security Council, appointed an Information Security Manager, developed a broad package of security policies and regulations covering database access, biometric personalization centres, physical and environmental security, backup management and incident response, and launched large-scale staff training. A particularly important feature was the development of an information asset registry and risk-management methodology through which assets, threats and controls could be systematically identified and managed. In this way, the PSDA built an information security architecture that strengthened the resilience, accountability and trustworthiness of the broader document-security system.<sup>47</sup>

### ***Ensuring high-level integrity of application, personalisation, stock management and delivery***

The Georgian system, operated by the PSDA, combined centralized electronic verification, separation of functions between front and back office, secure stock management, protected personalization procedures, traceable delivery and legal safeguards aimed at avoiding multiple

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<sup>47</sup> Interview with Mamuka Samkharadze, Former Deputy Chairperson of the PSDA and Director of the Database and IT Infrastructure Management Department.



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valid documents per person. These measures were embedded in the operational rules of passport issuance and were reinforced by both software controls and secondary legislation.<sup>48</sup>

- **Application and identification stage**

At the application and identification stage, the unified electronic system served as an important safeguard for the integrity of the process. During document processing, the information submitted by the applicant was checked against data already available in relevant state registers and identity-management systems to verify consistency and detect possible discrepancies. The process also included technological tools for identity verification and additional checks where necessary. Where inconsistencies were identified, the case was subject to further verification and could not proceed until the relevant issues were resolved in accordance with the law.

- **Separation of functions**

The integrity of the process was reinforced by separation of functions and workflow controls. As mentioned earlier, order of the Minister of Justice, together with the methodological guidelines approved under Order in September 2012, organized the issuance process in a manner that clearly separated front-office and back-office tasks.

- **Personalization and production process**

Georgia introduced a regulated and security-oriented framework to produce biometric passports, based on formally defined procedures and controlled handling of document materials throughout the production cycle. Initially the security of printing was regulated by special guidelines elaborated by the technology provider, Oberthur Technologies. The process was governed by internal rules and technical requirements that ensured accountability, traceability and restricted access at each stage. In this way, passport production was not treated as a purely technical printing exercise, but as a controlled security process embedded in the wider document-security system.<sup>49</sup>

- **Personalization chain**

The personalization stage was likewise carried out under clearly regulated procedures designed to ensure the integrity of both the physical document and the electronic data it contained. The process included successive verification and quality-control steps to ensure consistency between the printed information, the biometric data and the electronic chip, as well as compliance with applicable technical standards. Where irregularities or defects were identified, established procedures provided for their formal recording and secure disposal. This reflected a broader approach in which personalization was subject to documented controls rather than individual discretion.

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<sup>48</sup> Ibid.

<sup>49</sup> Ibid.



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- **Distribution process and Stocks of documents**

The handling, storage, and distribution of document stocks were organized through controlled and traceable procedures designed to safeguard the integrity of the issuance process. Secure arrangements were in place for the storage of blank and issued documents, while their transfer, receipt, and handover were subject to formal control and recording. Importantly, a document became fully operational only after completion of the verified delivery process to its lawful holder. The retention of related application materials further strengthened traceability, accountability, and the overall security of the system.

- **Avoiding multiple passports, identity cards and breeder documents**

An important component of Georgia's document-security reform was the establishment of legal and operational safeguards to prevent the issuance of multiple valid passports, identity cards or breeder documents to the same person. This was guided by the principle of "one person one document," which was reinforced through legislative amendments detailed above, restrictions on the issuance of additional passports, abolition of passport extension, and rules ensuring that each individual held their own separate and valid document. These measures were supported using a unified electronic system and central verification mechanisms, which strengthened consistency across the registration and document-issuance process and reduced the risk of duplicate or parallel identities.

- **Other documents**

The same integrity-based approach was applied across the wider document system, including identity cards and breeder documents. Passport issuance, ID-card issuance and civil registration were linked through a unified electronic environment, allowing changes in civil status records to be reflected across the system and verified in real time. This integration reduced the likelihood that inaccurate or inconsistent underlying records could be used to obtain multiple or false identities and ensured that document security was not limited to passports alone but extended across the full chain of identity management.

Overall, the high level of integrity in the document chain was achieved through several mutually reinforcing measures: electronic identity verification at the application stage; randomized and separated workflow; tightly protected stock management; controlled personalization with chip and print verification; traceable delivery and activation only upon issuance; and legal as well as technical barriers against multiple valid documents for one person.

### ***Mechanisms for Timely Reporting of Compromised Travel and Identity Documents to International Databases***

Georgia developed a structured mechanism for the prompt and systematic reporting of compromised travel and identity documents to international databases, such as the Interpol system. A key step in this process was the strengthening of cooperation between the PSDA and the National Central Bureau of Interpol in Georgia operating within the MIAG. The exchange of



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relevant information between the responsible institutions was organized on a regular basis through an established legal and operational framework. Over time, this cooperation was further expanded to cover additional categories of travel and identity documents, thereby strengthening the overall system for reporting, information sharing, and document security. Particularly notable was the sharp increase in reporting after the strengthening of legal and technical arrangements.

Georgian authorities also introduced measures to ensure the practical use of international stolen and lost document databases in border control. This required both operational integration into border management practice and the adoption of the necessary regulatory framework. Additional technical support was also provided to enable document checks in a wider range of control settings, including where connectivity or operating conditions were more limited.

Alongside reporting to Interpol, the PSDA also developed channels for the regular exchange of document-related information and cooperation on fraud prevention with international partners, including relevant institutions of EU institutions and member states. Specimens of the identity documents issued by the PSDA were transmitted to the Ministry of Foreign Affairs, which in turn shared them with embassies accredited in Georgia. This supported recognition of Georgian documents and facilitated document examination by foreign authorities.<sup>50</sup>

In parallel, Georgian authorities strengthened its ability to verify foreign documents and detect fraud through access to international document databases. With the support of the International Organization for Migration (IOM), the PSDA obtained access to global online document-checking systems, enabling them to verify the authenticity of documents submitted by foreign nationals, including in residence-permit procedures, and to identify possible fraud more effectively.

Georgia also sought to align its document verification framework with international aviation and travel document security standards. Recognizing the importance of remaining compliant with ICAO requirements, the PSDA completed negotiations to join the **ICAO Public Key Directory (PKD)**. Georgia formally joined the ICAO PKD on 25 May 2016<sup>51</sup>, with technical integration then underway. Participation in the PKD was particularly significant because it enabled Georgian authorities to share travel-document validity verification mechanisms with international partners, including EU Member States, and strengthened the capacity of foreign authorities to authenticate Georgian electronic travel documents. This step contributed both to the robustness of Georgia's document-security system and to confidence in the validity of Georgian travel documents in the wider European and international environment.

Taken together, Georgia's approach combined three mutually reinforcing dimensions: first, systematic and timely reporting of compromised documents to Interpol; second, operational use of international databases at border crossing points and ports; and third, regular cooperation with international partners through specimen sharing, access to fraud-detection tools, and alignment with the ICAO verification mechanisms. In this way, document security was linked not only to national issuance and registry systems, but also to the international circulation of

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<sup>50</sup> Interview with Zurab Magradze, Former Deputy Chairperson of the PSDA and Director of the IT Development Department.

<sup>51</sup> <https://www.icao.int/icao-pkd/participants> Accessed 23.04.2026.



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document-security information and to practical cooperation aimed at preventing fraud and strengthening trust in Georgian travel and identity documents.

### 5.3. Document Security in the Republic of Moldova

#### *Development of the Legal Framework for Document Security*

The development of legislative and governance frameworks regulating civil status registration and identity management in the Republic of Moldova had been underway since the 1990s. For example, at the end of 1995, the first personal identification codes had been introduced. The process of building up the State Population Registry (SPR) and its digitalization efforts had been ongoing since 1999. However, the process was slow and fragmented. The VLAP served as a powerful incentive for Moldovan authorities to undertake substantial legislative and institutional reforms in this field.

Moldova's legal framework regulating identity documents underwent significant modernization between 2011 and 2014 under the VLAP reforms. The primary subject of the legislative revision was **Law No. 273/1994 on Identity Documents in the National Passport System**, the fundamental legislative act governing the issuance of passports, identity cards, and other official documents.<sup>52</sup>

The law was amended to establish new legislative standards for upgrading document formats, expanding the categories of identity documents, and clarifying institutional responsibilities.<sup>53</sup> As a result, the standards of identity cards, residence permits, and temporary documents were considerably improved.

Government Decision No. 376/1995 was updated in 2011, to introduce further measures for the issuance of the first biometric passports by the National Passport System. It set technical conditions for collecting biometric data, including digital photographs and fingerprints.

A significant portion of the legal framework was further developed through secondary legislation. **Government Decision No. 125 of 18 February 2013**,<sup>54</sup> approved regulations on the issuance of identity documents and the registration of residents of the Republic of Moldova. It defined procedures for issuing identity cards, passports, and other official documents, and introduced rules governing the registration and updating the data in the SPR.

Further amendments to the law and the relevant government decisions clarified the responsibilities of the Ministry of Foreign Affairs and diplomatic and consular missions in issuing biometric passports. In practice, consulates were granted the authority to issue biometric passports and were integrated into a unified system for biometric document issuance.

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<sup>52</sup> [https://www.legis.md/cautare/getResults?doc\\_id=87792&lang=ru](https://www.legis.md/cautare/getResults?doc_id=87792&lang=ru) Accessed 23.04.2026.

<sup>53</sup> Interview with former officials of MITC (CRIS Registru).

<sup>54</sup> [https://www.legis.md/cautare/getResults?doc\\_id=66668&lang=ro#](https://www.legis.md/cautare/getResults?doc_id=66668&lang=ro#) Accessed 23.04.2026.



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In parallel, **Law No. 133/2011 on Personal Data Protection**<sup>55</sup> was adopted, and a National Data Protection institution was established as an independent body responsible for supervising personal data protection across government institutions.

### *Development of the Institutional Framework for Document Security*

Civil status and civil registration functions were distributed among different government agencies during different periods in Moldova. From 2009 to 2017, including the VLAP implementation process, responsibilities for civil registration were distributed among the Ministry of Justice, the Ministry of Foreign Affairs, and the Ministry of Information Technology and Communications (MITC). The Ministry of Justice was responsible for case management and legal decision-making, while the Ministry of Foreign Affairs provided services related to identity documents for Moldovan citizens abroad. The MITC was responsible for the development of the Government's digital infrastructure in the document security domain and ensured the operation of the SPR.<sup>56</sup>

As technological advancement was identified as an important component of the reforms the MITC emerged as a key implementer of the VLAP requirements in the document security domain. By that time, the digitalization of data had already been finalized, and the integration of all databases remained a core milestone in document security. The MITC's crucial responsibility was to connect the SPR with different government data sources, such as Civil Status Records (birth, marriage, divorce, and death records), the Identity Documents Database (linking each document to the unique IDNP<sup>57</sup>), Residence and Migration Records, and Government Information Systems (taxation, social security, and healthcare).

The MITC managed to fully integrate its databases by 2013, which laid the foundation for the 2017 reform envisaging the development of public services and the continuation of the modernization process. For these purposes, the Public Services Agency (PSA) was established based on Government Decision No. 314 of May 22, 2017,<sup>58</sup> as part of the public services reform plan (2017–2021).<sup>59</sup> As a result, the MITC was dissolved and its responsibilities were transferred to the PSA and other ministries. The latter took over the operation of state registers and administration of identity documents, while other functions were absorbed by ministries such as the Ministry of Economy.

The PSA centralized and integrated processing of state registers and public services and continued technological modernization. It took over full authority in the document security domain, including both front-end and back-end services. All the databases previously managed by the MITC were transferred to the PSA. Through the new agency, citizens gained access to integrated e-services (e.g., online IDNP verification, property records, and business registration).

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<sup>55</sup> [https://www.legis.md/cautare/getResults?doc\\_id=133182&lang=ru](https://www.legis.md/cautare/getResults?doc_id=133182&lang=ru) Accessed 23.04.2026.

<sup>56</sup> [https://www.legis.md/cautare/getResults?doc\\_id=22995&lang=ro#](https://www.legis.md/cautare/getResults?doc_id=22995&lang=ro#) Accessed 23.04.2026.

<sup>57</sup> In Moldova, IDNP stands for the Romanian term "Numărul de Identificare de Stat al Persoanei", which translates roughly as State Personal Identification Number.

<sup>58</sup> [https://www.legis.md/cautare/getResults?doc\\_id=116622&lang=ru](https://www.legis.md/cautare/getResults?doc_id=116622&lang=ru) Accessed 23.04.2026.

<sup>59</sup> <https://www.asp.gov.md/en/media/2017-12-06-0> Accessed 23.04.2026.



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The PSA became the single authority managing state registers, replacing fragmented responsibilities previously held by the MITC, the Ministry of Justice, and other institutions.

Moreover, the Agency was also assigned new registers such as the State Register of Legal Entities (companies, NGOs), the State Register of Transport and Drivers, the Real Estate Register and Cadastre, the Register of Licenses and Authorizations, the Register of Weapons and Ammunition, as well as other databases that were progressively integrated.

### **Establishment of the State Population Registry**

Until 1999, Moldova did not have a unified numeric identifier for its citizens. Individuals were identified through traditional personal details such as name, surname, date and place of birth, and the series and number of their identity documents. This system, inherited from the Soviet Union, made it difficult to ensure uniqueness and consistency across records. It created significant challenges for processing data in databases and administrative procedures.

In 1999, alongside the establishment of the SPR in accordance with Government Decision No. 333 of 18 March 1999, a universal personal numeric identifier was officially introduced. Since then, every citizen and resident has been assigned a unique 13-digit code, the IDNP. This identifier is incorporated into identity cards, passports, and other official documents and recorded in the SPR database.

According to Moldovan legal standards, the IDNP is assigned automatically when a newborn Moldovan citizen is registered in the SPR. The process involves the submission of a birth declaration to the civil status office, the entry of the child's data into the SPR, and the generation of a unique 13-digit number that remains valid for life. The IDNP is then recorded on the birth certificate and subsequently appears on all official documents, such as identity cards, passports, and driving licenses. Once assigned, the IDNP becomes a permanent attribute of the individual and cannot be modified, regardless of changes such as name or surname, marriage and adoption of a spouse's name, or divorce and reversion to a previous name. Each person is assigned only one IDNP for life.

Data on citizens born after 1999 has been recorded in digital form and incorporated into the SPR. However, the SPR did not contain complete data from the breakaway Transnistrian region (which remains outside the control of Moldova's constitutional authorities). The only exception concerned individuals who voluntarily applied for Moldovan identity documents or entered government-controlled territories through internal crossing points and registered; in such cases, their data were incorporated into government databases.

For individuals born before 1999, the IDNP was assigned retroactively through automatic generation by the system embedded in the SPR and has since been integrated into all civil status documents. The retroactive assignment of the IDNP was based on retrieving existing data from civil records. There were cases of overlapping records, errors, and contradictory or incomplete data. In such situations, authorities carried out additional administrative procedures to check and verify the uniqueness of the IDNP.

The implementation of identity management based on identification through the IDNP, as well as the establishment of the SPR, was preceded by significant efforts to digitize existing civil status records. This required the consolidation of data from different government agencies, including databases



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managed by the MIARM and other institutions. At the time of launching the SPR and assigning the IDNP, digitalization was still underway, and administrative processes were conducted in a hybrid mode. The authorities still had to rely on paper-based procedures to identify individuals in cases where applicants for new documents had been born before 1999 and their data had not yet been digitized.

One of the key achievements of Moldova's document security reforms under VLAP implementation was the introduction of an online identity verification mechanism. The IDNP could be verified online through official government portals under certain conditions.<sup>60</sup> The verification process involved two steps: first, entering the IDNP into the portal, and second, receiving confirmation of whether the IDNP exists. This measure also contributed to preventing and combating the use of passports subject to falsification or containing false elements, as such documents could be checked in real time against the existence of the corresponding individual based on the IDNP.

In the process of enhancing document security to meet VLAP benchmarks, Moldovan authorities faced two significant challenges: (1) ensuring accurate identity management of residents from the breakaway region of Transnistria, and (2) properly identifying Moldovan citizens with multiple citizenships, as well as foreign nationals entering the country using different documents.

Heightened attention was paid to strengthening control over civil status documents issued to Moldovan citizens residing in the breakaway Transnistrian region. Several measures were taken to improve the security of biometric documents issued to individuals born in that region. These included the digitalization of civil status archives, as well as the development of methodologies to identify individuals from the region through access to information from relatives and other verification tools. Moldovan citizens residing in the breakaway Transnistrian region and applying for their first biometric passport were exempted from passport fees as part of a targeted government policy aimed at building trust and encouraging applications. Moldovan authorities recognized birth and death confirmation documents issued in the region after specific verification procedures and used them as a basis for assigning an IDNP, issuing a birth certificate, and subsequently providing a national identity document and a biometric passport.<sup>61</sup>

Another major challenge faced by Moldova's public administration was the identification of individuals holding multiple nationalities, including Moldovan citizens with dual nationality and foreign nationals with multiple citizenships. Concerns were high regarding the risks of duplicate identities, fragmented recognition, and legal inconsistencies at Moldova's border crossing points, namely, overstays and unauthorized crossings through the Transnistrian region.

To address these challenges, Moldovan authorities introduced a mechanism to ensure that all individuals present on the national territory could be uniquely identified. **Under this approach, an IDNP is automatically assigned to non-residents and foreign nationals upon their first crossing of a Moldovan border checkpoint. Once assigned, this identifier remains unique and permanent,**

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<sup>60</sup> <https://e-services.md/ro/verifica-idnp> or <https://e-services.md/ru/verifica-idnp> Accessed 23.04.2026.

<sup>61</sup> As of 1 April 2019, over 2.3 million citizens of the Republic of Moldova (over 65% of the total population), including over 167,000 citizens residing in the Transnistrian region, had been issued biometric passports. According to the official data provided by the Moldovan MFA, compared with the total number of Moldovan citizens that have travelled to the EU since 28 April 2014, over 91% of Moldovan citizens holding biometric passports have used them to visit the EU in the last 5 years of VLAP.



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**as in the case of Moldovan citizens.** Although this approach is highly unusual in international practice, it enables the authorities to identify individuals despite changes in personal data, such as name or citizenship. Nevertheless, ensuring reliable identification of these categories of individuals remained challenging.

As part of the solution, authorities focused on a technological approach, developing reliable algorithms to ensure that everyone is assigned a single unique IDNP, regardless of the number of nationalities held or citizenship status. These algorithms enable cross-document recognition, update border control systems so that any passport used is linked to the same IDNP and integrate identity data across national databases. Subsequently, pilot projects at the airport tested facial recognition systems for identity verification. These initiatives formed part of broader efforts to strengthen border security and ensure that individuals could be reliably identified, even if they held multiple passports.

Another important measure was the exploration of international practices, such as the API system, under which airlines transmit passenger data to Moldovan authorities prior to arrival. Following its introduction, the API system provided border control officers with sufficient time to cross-check identities against national databases and detect potential risks, including overstays or irregular crossings through the Transnistrian region.

### ***Development of the Legal and Institutional Framework for the Rollout of Machine-Readable Biometric Passports***

To implement the VLAP in the document security domain, the adoption of several layers of legal and technical standards for biometric travel documents was necessary. This was mainly accomplished through the amendments of the above-discussed Law No. 273/1994 on Identity Documents in the National Passport System. The amendments adopted in 2014 established the legal framework for biometric passports compliant with ICAO and EU standards.

In parallel, several government decisions were adopted, establishing the technical and administrative procedures for issuing biometric passports, including Government Decision No. 125 of 18 February 2013, approving the Regulation on biometric passports, and Government Decision No. 1459 of 2014 on the implementation of biometric technologies and issuance procedures. Amendments to Government Decision No. 1007/2012 set a regulatory framework for the circulation of new models of passports and travel documents and established requirements for interoperability with EU and ICAO standards.

Numerous bylaws, internal regulations, and SOPs were amended within the MITC and the MIARM. For example, rules on collecting biometric data (photographs and fingerprints), procedures for storing and protecting data in the contactless microchip, and provisions on validity periods were revised. Some internal procedures were also adjusted to enable automated verification of biometric passports at border checkpoints.

As a result of continuous efforts, documents issued by Moldovan authorities comply with ICAO standards for document security. This applies not only to travel and identity documents for citizens, but also to those issued to foreign nationals, stateless persons and applicants for, and beneficiaries



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of refugee status. In 2009, the Republic of Moldova also joined PRADO—the online Public Register of Authentic Identity and Travel Documents of the Council of the European Union.

### **Roll out of Machine-readable Biometric Passports**

Until the VLAP, Moldovan authorities issued three main types of passports: a) **Ordinary (classic) passports:** for Moldovan citizens, used for personal travel, b) **Service passports:** granted to civil servants and state employees who travelled abroad on official business, but without diplomatic status and c) **Diplomatic passports:** intended for ministers, members of parliament, ambassadors and other diplomatic personnel. The validity periods are 5 years for ordinary, 4–5 years for service and diplomatic passports.

Not all passport types contained an electronic chip or biometric data. The data included in passports (travel documents) was limited to printed information (name, printed photograph, signature). These documents were less secure, easier to forge, and did not comply with ICAO standards for travel documents. As a result, Moldovan citizens faced difficulties in having their documents recognized in some states, and border verification processes were slower.

The documentation issued domestically in the process of identity management of the population in Moldova included identity cards, passports (including biometric passports), birth certificates, marriage and divorce certificates, death certificates, and residence permits (for foreign nationals). Outside of Moldova, only passports could be issued by Moldovan consulates.

Starting from 1 January 2011, the Republic of Moldova began issuing exclusively biometric passports, which included digital fingerprints and a digital photograph. This enabled Moldovan authorities to accumulate relevant experience and build institutional capacity. However, for the rollout of a new generation of machine-readable biometric passports aligned with EU requirements, the introduction of additional internal standards, technical capacity, and expertise was required.

To operationalize legislative amendments mentioned above, the MITC provided substantial capacity development. For this purpose, in 2012, new units, the E-Transformation Service and Technical Regulation and Standardization Service, were established within the MITC.<sup>62</sup> The MITC also adopted internal regulations introducing ICAO standards for passports and identity documents, drawing on the experience of France. These standards included biometric data integration, electronic security features, a machine-readable zone, a validity period of up to 10 years, and multilingual information (Romanian, English, and French).

Machine-readable biometric passports complying with EU standards were introduced in practice on 1 August 2014, with the initial secure passport booklets outsourced to Gemalto, a leading French company in biometrics and document security.<sup>63</sup> These passports included a digital portrait and fingerprint data stored in a contactless microprocessor, significantly strengthening identity verification and border security. Gemalto's ePassport for Moldova stored a digital portrait and two

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<sup>62</sup> [https://www.legis.md/cautare/getResults?doc\\_id=23006&lang=ro#](https://www.legis.md/cautare/getResults?doc_id=23006&lang=ro#) Accessed 23.04.2026.

<sup>63</sup> French technology company, now part of the Thales Group. See: <https://www.thalesgroup.com/en/enterprise> Accessed 23.04.2026.



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fingerprint scans within its contactless microprocessor, enabling secure and reliable authentication of the holder's identity.

The new program introduced Supplemental Access Control, the latest security mechanism recommended by the ICAO and mandated by the EU to protect access to data stored in the microprocessor. These passports also incorporated Sealys eTravel embedded software, certified in accordance with the ICAO Common Criteria. In addition, they were equipped with highly durable Sealys eCovers and inlays, designed for a lifespan of up to 10 years.

**Moldova's EU-standard machine-readable biometric passports have a validity period of 10 years for adults and 5 years for children aged 0–7.** With the introduction of biometric passports in 2014, the old ordinary passports already in circulation remained valid until their legal expiration date.

**Service passports** were gradually eliminated through amendments to Law No. 273/1994 and government decisions adopted during 2013–2014, when a unified system of documents based on biometric passports was introduced as part of the VLAP reforms.

Until 2011, the procedure for submitting passport applications (ordinary, service, or diplomatic) was organized according to the applicant's place of residence. To submit documents, citizens were required to apply at the territorial passport offices corresponding to their domicile. This was due to the decentralized nature of the system, which was designed to manage the flow of applications locally, while central administration from Chişinău could intervene only in special cases. This practice changed in 2018 with the development of multifunctional centres under the PSA. Thereafter, individuals could apply for the issuance of documents anywhere, regardless of their place of residence.

Since January 1, 2006, Moldovan citizens have been legally allowed to hold two valid Moldovan passports simultaneously, provided they submit a written request to the relevant passport office, justifying the need (e.g., frequent travel or visa requirements).

### **Data Protection and Ethics**

Law No. 133 of 2011 on **Personal Data Protection** introduced strict standards for the protection of privacy rights for government institutions and data operators in the Republic of Moldova. The law established a regulatory framework for biometric data (photographs, fingerprints, and facial recognition), classifying it as sensitive information requiring a higher level of protection.

With the introduction of biometric passports, the government tightened the rules governing the collection and storage of biometric data. In 2012, based on the provisions of the law, the **National Center for Personal Data Protection (CNPDCP)** was established as an independent public authority with supervisory powers. As a supervisory authority, the CNPDCP has been responsible for monitoring, providing guidance, regulating compliance, and applying sanctions.

The law required all public institutions to register as personal data operators with the CNPDCP. It imposed strict rules and established a clear causal link between the necessity of using personal data and the volume of data accessed. Moreover, it required that every instance of database access be recorded with detailed logs (date, time, user, and purpose), ensuring full



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traceability and accountability. This mechanism served both as evidence for the CNPDCP and as a means to monitor the traceability of checks, their objectives, and the scope of information accessed. It ensured compliance with international standards and prevented unjustified or abusive use. The CNPDCP paid considerable attention to safeguarding biometric data and carried out regular inspections as well as ad hoc checks. The latter were usually initiated upon requests from individuals who filed complaints.

Any person, having reasonable suspicions, for safeguarding privacy rights, could submit a written request to the MITC or the CNPDCP to verify the legality and compliance of such access. To prevent abuse, or in situations where special investigative measures were being applied, individuals were informed only that no irregularities had been identified in relation to access to their personal data, without being provided with further details. In cases where checks had indeed been carried out, individuals could receive a response indicating who performed the verification, the reason, and the date of the check.

In addition to control of the national mechanisms, Moldovan authorities became subjects of external monitoring in terms of data protection. In 2012, the launch of the preliminary GDPR framework at the EU level and the initial evaluation of Moldova's legislation took place, intending to verify legislative harmonization by DG JUST. In 2014, EU experts monitored the collection and storage of biometric data (passports, registers).

In addition, Europol organized the first pre-assessment mission on compliance with personal data protection standards in Moldova in 2013. The objective was to evaluate Moldova's legal framework and practices in the area of personal data protection in the context of cooperation with Europol. This assessment later had a direct impact on the establishment of the Secure Information Exchange Network Application (SIENA) within the police, the secondment of a Moldovan liaison officer to Europol, and the development of operational data exchange between Europol and Moldova. At the level of the MIARM, a dedicated unit for personal data protection was established.

Integrity standards were based on the Code of Conduct for Public Servants (Law No. 25/2008), which applied to all ministries, including the MITC. In addition, the National Internal Control Standards for the Public Sector (Order of the Ministry of Finance No. 189/2015) have been operational since 2015. These standards required each institution to adopt its own internal Code of Ethics. In line with this requirement, the MITC adopted internal regulations outlining rules of conduct, provisions on conflicts of interest, professional integrity requirements, and the ethical responsibilities of its staff.

The MITC had a clear set of mandatory technical requirements for information security, focusing on database access control, encryption, monitoring, auditing, backups, and other cybersecurity details. These rules formed part of the security standards for the national e-government infrastructure and were designed to safeguard sensitive data. Within the MITC, several units were responsible for integrity and information security. The Human Resources and Internal Control Directorate was in charge of applying the Code of Conduct, disciplinary procedures, and managerial internal control, while the Information Technology Directorate and the Information Security Directorate were responsible for database security, protection of the e-government



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infrastructure, and the implementation of technical cybersecurity standards. All these units maintained close cooperation with security agencies.

Professional development programs were organized based on identified needs, annual planning, or institutional partnerships. Technical training was conducted internally by MITC specialists and focused on information systems, database administration and security, and other aspects of cybersecurity. Administrative training, involving experts from relevant public institutions, covered internal control, the prevention of conflicts of interest, and the application of the Code of Conduct, involving experts from relevant public institutions. The overall approach to training was planned annually and adapted to the specific needs of the ministry and its staff.

### ***Mechanisms for Timely Reporting of Compromised Travel and Identity Documents to International Databases***

The Republic of Moldova established a dedicated legal framework for handling lost and stolen passports, ensuring both national invalidation procedures and the timely exchange of information with international partners. The MIARM and the MITC put in place clear reporting and data-exchange mechanisms, ensuring that Moldova's biometric passport system remained secure and internationally trusted. Since the establishment of these mechanisms, lost or stolen Moldovan passports were immediately recorded and invalidated in the national system.

The exchange of data on lost and stolen passports is regulated by a dedicated agreement between the MITC and the MIARM. Information exchange is carried out through a direct cooperation mechanism between the MITC and the Police Directorate for International Police Cooperation (Moldova's national contact point for Interpol). This system enables real-time data sharing, ensuring that once a passport is reported as lost or stolen, it is promptly flagged in both national and international databases.

The Moldovan Border Police benefited from advanced training, often supported by the Organization for Security and Co-operation in Europe (OSCE) and EU partners, to identify forged, falsified, or stolen documents. This training focused on biometric data verification, passenger risk assessment, and the detection of impostors. As a result of several capacity-building activities, Border Police units use specialized equipment to detect altered documents and identity fraud, leading to numerous apprehensions of individuals attempting to cross the border with fraudulent documents, including in 2014. The Border Police operates risk-profiling mechanisms at border crossing points to monitor the movement of persons and identify risks related to human trafficking, as well as the use of false, forged, or lost documents.

One of the challenges encountered in implementing biometric passports concerned the distinction between documents reported as lost and those reported as stolen. When a passport was declared stolen, it had to be reported to the police, triggering an investigation that often delayed the issuance of a replacement document. By contrast, when a passport was declared lost, applicants could apply directly at MITC offices through a simpler and faster administrative process, without police involvement. As a result, some individuals whose passports had been stolen opted to report them as lost to avoid more complex procedures and obtain replacement documents more quickly. To address this issue, Moldova introduced a system of self-



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declarations, whereby applicants are required to state, under their own legal responsibility, whether the document was lost or stolen.

### 5.4. Comparative assessment

Georgia and Moldova went through different pathways for reforming their document security and identity management systems to meet VLAP requirements. Even though the VLAP played a crucial role in accelerating reforms, set the directions for development and spurred technological advancements, the logic of the reforms, the content and the paradigm of the implementation diverge significantly.

#### **Key differences identified by the study beyond the reform logic:**

- Moldova carried out targeted actions oriented on problem solution and implemented targeted projects, ensuring gradual multi-stage advancement in longer terms. The reform reassembled three different cycles: (1) the separate reform encompassing the population registration system, (2) the VLAP required technological upgrades, (3) the public service advancement.
- In Georgia, the document security reform was a comprehensive multidimensional project, aiming technological advancement and public service delivery at the same time, under continuous data-quality management accompanied by building integrity mechanisms, data protection standards and information security safeguards.
- For security reasons, Georgia follows the principle of “one person one document”, prohibiting the holding of more than one passport, except in rare cases determined by the law.
- Moldovan legislation permits holding two Moldovan passports simultaneously, as well as multiple citizenships. Both valid passports are issued with identical security features, but with a single IDNP for both valid passports. Moldova uses a single personal identification number (IDNP) integrated across all identity documents.
- Georgia used extensive trainings as an instrument not only for awareness raising of operational staff, but as an instrument for advancing integrity, data protection, and information security standards for the evolution of a high-level and sustainable institutional culture.
- In Moldova, trainings were focused on addressing specific problems and targeted capacity-building needs.

#### **Despite significant differences, the study identifies the following key similarities:**

- An electronic national population registry was established and interconnected with the databases of various government agencies, enabling data exchange based on legal agreements that safeguard data protection standards. This approach does not preclude the retention of sectoral databases by individual agencies.
- A unique identification number was introduced as the primary mechanism for identifying citizens.
- Georgia consolidated document security into a single agency, the PSDA, operating under the Ministry of Justice, that ensured the effectiveness of the reforms, accelerated



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digitalization, strengthened international cooperation. Digitalization and integration of the databases, accompanied by personal data and information security measures, were the cornerstones of Georgian developments.

- Moldova's reform aimed to centralize all person-related databases into a single command center, reducing administrative costs and improving interoperability under MITC (later the PSA). Only specific databases related to police operations remained under the competencies of the MIAG, and other databases related to specific activities of other line institutions.
- Georgia used in-house resources of the PSDA and some donor support for the organization of digitalization, identity management process, roll-out of passports and related activities.
- Moldova built its database systems using in-house expertise, while the initial biometric passport booklets were procured from GEMALTO, a French supplier.
- Significant updates to national legislation, accompanied by the adoption of numerous internal regulations and SOPs, as well as staff training, were key dimensions of the reform alongside digitalization.
- Implementation of targeted public awareness campaigns to encourage the population to obtain new biometric documents.

Key **strengths** identified: (1) the **consolidation of administrative authorities and integration of databases** under a single agency significantly enhanced institutional coherence, streamlined business processes, and strengthened system integrity, contributing to more efficient service delivery and oversight; (2) **the synchronization of technologies, introduction of legal standards, and provision of extensive training** acted as critical enablers of reform, ensuring alignment between regulatory frameworks, technical systems, and institutional capacities; (3) **sustained emphasis on integrity, data protection, and information security** reinforced public trust and aligned reform efforts with European standards and best practices in governance and data management; (4) **the effective utilization of in-house ICT resources** increased institutional ownership of reforms, reduced dependency on external providers, and supported the long-term sustainability of technological advancements.

The implementation of reforms through separate, problem-oriented interventions across multiple stages may reduce overall coherence and slow broader systemic change. This approach could be considered a **weakness**; however, it is highly context-dependent and influenced by available resources.



## Chapter 6. Migration Management and Asylum Policy

### 6.1. General Overview

Migration management represents a highly sensitive and strategically important policy area for EU, given its implications for security, mobility, and political cohesion. Within this context, EU partner countries engaged in visa liberalization processes are required to establish comprehensive, resilient, and well-coordinated migration governance systems capable of effectively managing migration flows while meeting EU standards and expectations. The VLAP provides a structured framework through which states may either reform and recalibrate existing institutional and legal arrangements or establish modern, integrated systems aligned with contemporary migration dynamics and EU standards.

In the cases of Moldova and Georgia, where migration management systems were previously underdeveloped and fragmented, the VLAP acted as a strong impetus for transformation. It not only accelerated institutional and legislative reforms but also elevated migration governance to a strategic policy priority within national security and public administration agendas.

Post-VLAP developments in both Moldova and Georgia demonstrate that coherent policy frameworks, robust governance arrangements, adequate institutional capacity, and well-established administrative practices are indispensable to address security and other migration-related challenges arising from the entry into force of visa-free travel with the EU. In this regard, the effective implementation of reforms initiated under the VLAP should not be viewed merely as a compliance exercise aimed at meeting formal benchmarks. Rather, it constitutes a forward-looking investment in state preparedness, equipping national systems to anticipate and respond to complex migration dynamics and hardships that may not have previously been experienced.

This chapter examines the VLAP-related reforms in the migration domain and asylum systems in Moldova and Georgia, structured in accordance with the benchmarks outlined under Block 2 of the VLAP. The analysis provides a concise overview of the pre-VLAP baseline, identifies key structural and operational shortcomings, and assesses the policy responses and reform measures undertaken to address them.

### 6.2. Migration Management and Asylum Policy in Georgia

#### *Development of the Institutional Framework for Migration Management*

Georgian practice in migration management is based on a whole-of-government approach (WoGA), which dates to the early post-independence period. In 1996, migration-related structures were consolidated within a collegial coordination body - the State Commission for the Development of Migration Processes Management System.<sup>64</sup> By 1997, an initial policy concept and elements of the legislative framework had been developed. However, these early efforts took place in a context of limited awareness of the importance of the problem, weak state capacity,

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<sup>64</sup> <https://www.matsne.gov.ge/ka/document/view/108154?publication=0> Accessed 23.04.2026.



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insufficient resources, and institutional fragmentation. As a result, practical implementation remained largely ineffective.

Between 1996 and 2010, sectoral institutions were gradually established and expanded, contributing to the shaping of key migration-related functions. Despite this institutional development, the system remained fragmented and lacked a coherent policy framework, as well as effective coordination mechanisms for implementation and enforcement. The functions were partitioned between several line ministries.

Closer alignment with the EU introduced a stronger reform dynamic from an insufficiently developed institutional architecture towards a more integrated and policy-driven migration governance and management system. The initial phase of Georgia's migration management system reform under the VLAP *inter alia* centred on strengthening the institutional capacity and effectiveness of the Collaborative Management Mechanism (CMM)<sup>65</sup> - the State Commission on Migration Issues (SCMI/Commission)<sup>66</sup> established in 2010 as a part of Georgia's EU approximation efforts, which was from the beginning supported by the EU. While reflecting Georgian institutional know-how, the SCMI system is broadly comparable to whole-of-government coordination models applied in Switzerland, Bulgaria, and Poland. The SCMI is a government consultative body, which consolidates all key stakeholders and promotes an action-oriented WoGA to define a unified government policy in the field of migration and to enhance the overall management of migration processes in Georgia.

Under the VLAP, the entire migration governance system in Georgia, including the SCMI, underwent a comprehensive reorganization, transforming the Commission into a body with shared responsibilities among its members and strong synergies across thematic areas. As a result of this reform, the SCMI was structured around four sets of actors:

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<sup>65</sup> CMM is a platform, that brings together all actors operating in the migration field, including sectoral government institutions, international organizations, civil society, academia, municipalities, human rights defenders, the private sector, and migrants themselves.

<sup>66</sup> Ordinance No 369 of the Government of Georgia (GoG) (23.9.2011).  
[http://migration.commission.ge/files/gog\\_ord\\_314\\_scmi\\_22.pdf](http://migration.commission.ge/files/gog_ord_314_scmi_22.pdf) Accessed 23.04.2026.

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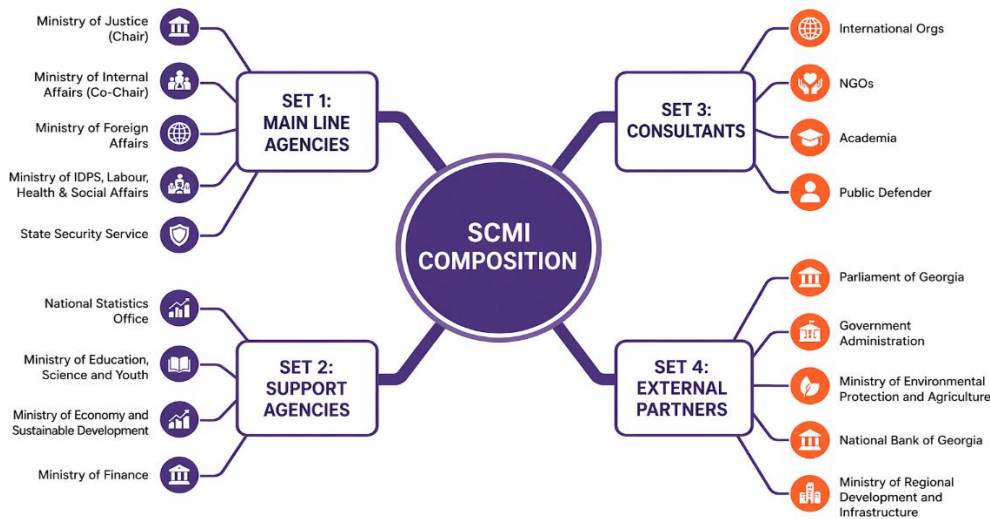


figure 6. SCMI Organogram

**The first set of actors**, constituting the core of the SCMI, comprises five member agencies representing the principal governmental bodies responsible for migration governance and management. Their primary areas of competence were as follows:

- **Ministry of Justice:** Served as a Chair and provided the Secretariat of the SCMI. Its competences encompassed citizenship and statelessness, residence permits, civil registry, identity and travel documents, as well as coordination of the Anti-Trafficking Council.
- **Ministry of Internal Affairs:** Acted as a Co-Chair of the SCMI. It was responsible for the detention and expulsion of irregular migrants, return and readmission, Integrated Border Management, asylum, counter-trafficking in human beings, and combating transnational organized crime.
- **Ministry of Foreign Affairs:** Responsible for consular services, visa policy and facilitation, diaspora engagement, strategic communication, and coordination of the EU integration policy.
- **Ministry of Internally Displaced Persons from the Occupied Territories, Labour, Health and Social Affairs:** Provided oversight over labour migration, integration of third-country nationals, reintegration of returning migrants, and the provision of services, including shelters, for victims of trafficking in human beings.
- **State Security Service:** Focused on the prevention and countering of counterintelligence, terrorism, and irregular migration.

**The second set of actors** comprised supporting member line ministries and agencies, which, while not directly leading migration governance and management, provided essential sectoral input and ensured policy coherence across relevant domains. Their contributions supported evidence-based policymaking and reflected the cross-cutting nature of migration. The respective institutions and their primary areas of competence were as follows:



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- **National Statistics Office:** Produced population censuses and household surveys including migration statistics.
- **Ministry of Education, Science and Youth:** Was responsible for the internationalization of education and science, student mobility, skills development, and recognition of foreign qualifications.
- **Ministry of Economy and Sustainable Development:** Contributed to labour market analysis, foreign investment, and tourism development.
- **Ministry of Finance:** Was responsible for customs administration and the management of the state budget.

**Set 3** within the SCMI was designated as the Consultative (i.e. non-member) tier. It brought together non-governmental and independent stakeholders that provided advisory input, technical expertise, and external oversight. This tier played a critical role in strengthening inclusiveness, transparency, and evidence-based migration policymaking, while facilitating dialogue between state institutions, international partners, and civil society. It also contributed to aligning national approaches with international standards and good practices. The Consultative tier comprised the following actors:

- **International Organizations:** Including the EU, the International Centre for Migration Policy Development (ICMPD), the IOM, the United Nations High Commissioner for Refugees (UNHCR), and the German Agency for International Cooperation (GIZ).
- **NGOs and Academia:** Comprising local civil society organizations (on a rotational basis) and academic experts contributing with research, analysis, and policy recommendations.
- **Public Defender's Office:** Providing independent oversight with a focus on the protection of human rights and the monitoring of migration-related policies and practices.

**Set 4** was defined as the external tier of organizations cooperating with the SCMI. It comprised external partners that contribute to migration governance through close coordination, policy dialogue, and alignment of sectoral policies. Their engagement ensured that migration considerations are effectively integrated into legislative processes, national development planning, economic policymaking, and local governance frameworks. The actors within this tier included:

- **Parliament of Georgia:** Responsible for the adoption of migration-related legislation and oversight of its implementation.
- **Government Administration:** Coordinated government action plans and oversaw the Public Administration Reform (PAR).
- **Ministry of Environmental Protection and Agriculture:** Addressed the linkages between migration and development policy, particularly in rural and environmental contexts, as well as the Environment, Migration and Climate Change nexus.
- **National Bank of Georgia:** Focused on the economic dimensions of migration, including remittances and related financial flows.

- **Ministry of Regional Development and Infrastructure:** Provided oversight over the role of municipalities and supported the integration of local governance into migration management.

SCMI’s analytical, advisory and administrative support was provided by its Secretariat, which at the same time was the European Migration Network’s (EMN) National Contact Point. The level of decision-makers (i.e., members) in the SCMI was determined by the rank of minister (mostly chairperson) or deputy minister, thereby ensuring that issues were delivered to, and agreed upon by, senior management (minister or prime minister) in a timely manner. This arrangement enabled streamlined, non-bureaucratic, consensus-based decision-making within the SCMI. It ensured more adaptive and responsive implementation of the VLAP, while strengthening sustained interagency coordination across institutions.

The SCMI, established as a WoGA-based coordination mechanism, has evolved into a central platform for ensuring coherence and alignment across interconnected thematic priorities. Given that the responsibilities for migration governance and the practical implementation of related functions are distributed among multiple institutions, the SCMI facilitates coordinated policy development and implementation. This has contributed not only to enhanced policy coherence but also to the institutional and thematic strengthening of participating entities.

To further operationalize its work across key priority areas, the SCMI established thematic working groups.<sup>67</sup> These groups brought together representatives of member agencies, alongside the organizations holding consultative status and invited experts, thereby enabling inclusive dialogue, technical exchange, and more targeted policy development.

The SCMI has been operational in this format since 2010 and is regarded as one of the most effective existing governance mechanisms.

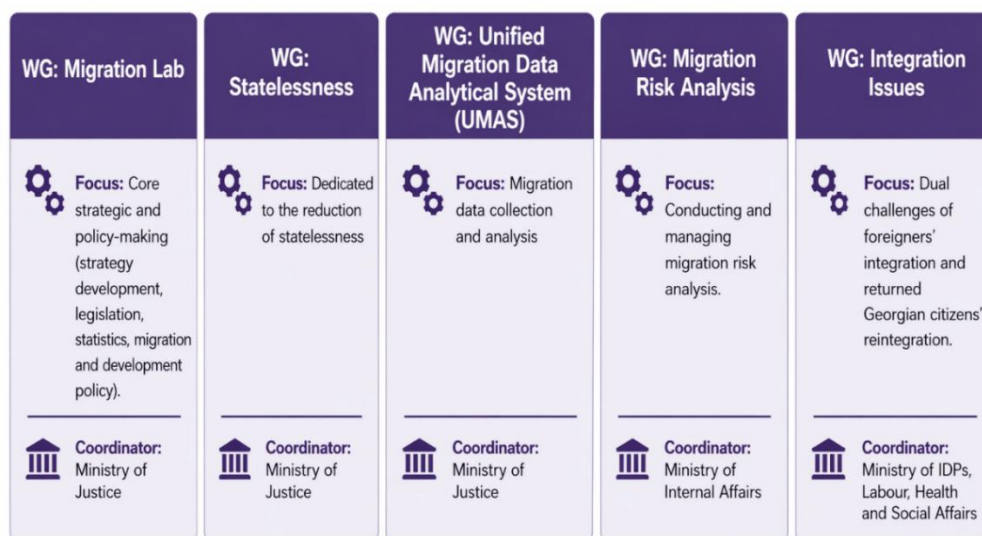


Figure 7. An overview of the SCMI thematic working groups

<sup>67</sup> See Figure 7 for an overview of the SCMI thematic working groups.



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The implementation of the VLAP played a pivotal role in strengthening the SCMI, reinforcing its function as an effective and operational coordination mechanism. Key developments include:

- **Enhanced national coordination:** Legislative and institutional reforms reinforced the SCMI's coordinating role, ensuring coherent policy planning, efficient resource allocation, and greater administrative consolidation. The adoption of a Whole-of-Government Approach (WoGA) was instrumental in operationalizing VLAP requirements across all relevant institutions, avoiding fragmentation and over-reliance on a single coordinating body.
- **Improved analytical capacity:** The inclusion of international organizations and civil society actors through a consultative status, alongside increased engagement with academia, strengthened the evidence base for policymaking and supported more informed decision-making processes.
- **Strengthened coordination of external assistance:** The introduction of a dedicated coordination mechanism for migration-related projects in 2013 enabled more effective alignment of donor-funded and national initiatives. The use of a coordination matrix<sup>68</sup> reduced duplication, addressed previous gaps, and facilitated the efficient utilization of EU assistance.

### *Development of the Legal Framework for Migration Management*

Among the key objectives of the VLAP, particularly under Phase 1, was the revision of existing migration-related legislation<sup>69</sup> and the development of new legal frameworks. Several core legislative frameworks were enacted as part of the VLAP implementation efforts.

**A new Organic Law on Georgian Citizenship** was adopted and entered into force in 2014. This legislation simplified the determination of Georgian citizenship and introduced new regulations for its acquisition through naturalization. The law was brought into full compliance with the 1961 UN Convention on the Reduction of Statelessness. It regulated the status of Georgian citizenship and other important issues, such as conditions and procedures of the acquisition and loss of the citizenship, and determined the competencies of various government agencies in this process.

**In 2014, the Law on the Legal Status of the Foreign Nationals and Stateless Persons** was adopted and entered into force, establishing new regulations governing the entry and stay of foreign nationals in Georgia, as well as introducing new categories of visas and residence permits. This reform improved the procedures for issuing visas and residence permits and strengthened the determination of the purpose of foreign nationals' stay in the country. In 2015, Georgia introduced the E-Visa Portal, allowing foreign nationals to obtain short-term visas (for purposes such as tourism, business, cultural, or sporting activities) without the need to visit a Georgian embassy or consulate.<sup>70</sup> The electronic visa grants the same right of entry into Georgia as a traditional visa sticker issued in a passport.

<sup>68</sup> [https://migration.commission.ge/index.php?article\\_id=36&clang=1](https://migration.commission.ge/index.php?article_id=36&clang=1) Accessed 23.04.2026.

<sup>69</sup> [https://migration.commission.ge/index.php?article\\_id=54&clang=1](https://migration.commission.ge/index.php?article_id=54&clang=1) Accessed 23.04.2026.

<sup>70</sup> <https://www.evisa.gov.ge/GeoVisa/> Accessed 23.04.2026.



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In 2014, the Ministry of Foreign Affairs launched the Consular Case Management Electronic System, “Geoconsul”.<sup>71</sup> The Geoconsul system represented a significant breakthrough, serving as a comprehensive portal for consular services and enabling users to access the full range of available services through a single platform.

In respect of foreign nationals, Georgia operates the Citizenship and Migration Electronic Management System (DCM). Based on the latter, Georgia has set up a ‘Distance Services’ Unit under the PSDA using the specially developed software to allow for the lodging of electronic applications for a residence permit and citizenship remotely. Applicants can complete and submit their applications online from any place worldwide, without having to visit any administrative office. An applicant should connect online with the Distance Services Unit, via direct audio-visual electronic communication to access the service. After the video communication and the verification that the application is complete and the respective attached documents have been uploaded to the electronic system, the e-application is submitted to the DCM to be processed. The main purpose of introducing the DCM system was to enhance e-governance, to save time and human resources of the relevant authorities, as well as to improve administrative procedures and the quality of customer service.<sup>72</sup>

**In 2015, the Law on Labor Migration** was adopted and entered into force. This law regulates labour migration from Georgia by establishing rules for intermediary companies and ensuring the provision of information to potential emigrants. Under the law, intermediary companies are required to submit information on their activities to the Ministry of Internally Displaced Persons from the Occupied Territories, Labor, Health and Social Affairs.

**The Law of Georgia on International Protection** entered into force in 2017, regulating the identification, referral and accommodation of asylum seekers and the conducting of the asylum procedure. Supporting by-laws have been adopted accordingly, including, *inter alia*, the Ministerial Orders on “Asylum Procedure” and “The Rule on identification of the request on international protection by foreigner or stateless person at the border of Georgia and exchange of information among the Migration Department of the MIAG, Patrol Police and Border Police.” The legislation is now aligned with the 1951 UN Convention Relating to the Status of Refugees and its 1967 Protocol.

### **National Migration Policy**

As part of the ongoing development agenda set by the AA and the VLAP, the SCMI subsequently implemented two tailor-made Migration Strategies (2013–2015 and 2016–2020). These strategies aimed to gradually introduce the Migration and Development (M&D) policy<sup>73</sup> and align the management system with its objectives. The coordination over the development, adoption and

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<sup>71</sup> <https://www.geoconsul.gov.ge/> Accessed 23.04.2026.

<sup>72</sup> [https://home-affairs.ec.europa.eu/document/download/72119462-57dd-4544-ab43-99eb2ffc5103\\_en?filename=00\\_EU\\_EMN\\_Digitalisation%20inform%20February%202022\\_EN\\_0.pdf](https://home-affairs.ec.europa.eu/document/download/72119462-57dd-4544-ab43-99eb2ffc5103_en?filename=00_EU_EMN_Digitalisation%20inform%20February%202022_EN_0.pdf) Accessed 23.04.2026.

<sup>73</sup> Migration and Development (M&D) principle refers to a policy concept and field of practice that examines the relationship between migration processes and socio-economic development. It focuses on maximizing the positive impacts of migration, such as remittances, skills transfer, and diaspora engagement, while addressing potential challenges, including brain drain and irregular migration, through coherent policy and institutional frameworks.



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implementation of the strategies was performed by the migration strategy Working Group (now Migration Lab) operating under the SCMI.

The Working Group served not only as a platform for the development of a new migration strategy (2016–2020), but also as a capacity-building mechanism for SCMI institutions. Its resources were used to strengthen understanding of the M&D principle and its relevance for both the strategy and longer-term policy planning, and to clarify expectations of co-author institutions. In addition, it contributed to building practical skills in preparing a new type of Migration Profile and using its data to develop evidence-based policy objectives, etc.

The main pillars of Georgia’s migration strategies for 2013–2015 and 2016–2020 included the support for legal migration, combating irregular migration; the return and reintegration of Georgian migrants; engagement with the Georgian diaspora; awareness-raising; migration and development; as well as international protection and integration.

The Migration Strategy 2013-2015<sup>74</sup> and its accompanying Action Plan<sup>75</sup> were developed prior to the VLAP and formally approved by the government in parallel with receiving the VLAP.<sup>76</sup> While this Strategy established an important foundation for institutional development in migration management and demonstrated a progressive orientation, it lacked several key components later identified as essential under the VLAP and subsequent PAR frameworks. These included, *inter alia*, robust monitoring and evaluation mechanisms, standards for evidence-based policymaking, systematic data collection and analysis, and a conceptual understanding of migration through the prism of M&D nexus.

Nevertheless, in the context of intensified cooperation with EU Member States under the AA and the VLAP, as well as engagement with other international partners, the SCMI sought to mitigate such shortcomings. It did so by utilizing the Action Plan as a main instrument, formulating results-oriented actions that mostly compensated for the Strategy’s initial limitations. The action also sought to institutionalize the use of data in migration management and policy planning, thereby strengthening evidence-based decision-making and underscoring the strategic importance of data for effective migration governance.

The subsequent Migration Strategy for 2016–2020<sup>77</sup> was developed based on progress achieved in preceding years, while also accounting for persisting challenges and introducing mechanisms to address them. The drafting process took place during 2014–2015, concurrently with the implementation of the VLAP. As part of this process, the SCMI’s Migration Strategy Working Group conducted a comprehensive assessment of the implementation of the 2013–2015 Strategy, identified the key thematic priorities for the new strategic cycle, and carried out a series of thematic situation analyses. Building on these analytical outputs, approximately 20 working group meetings, held in various formats, were convened to deliberate on and agree upon the strategic objectives.

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<sup>74</sup> [https://migration.commission.ge/files/migration\\_strategy\\_-\\_eng.pdf](https://migration.commission.ge/files/migration_strategy_-_eng.pdf) Accessed 23.04.2026.

<sup>75</sup> [https://migration.commission.ge/files/msap\\_2013-15\\_eng.pdf](https://migration.commission.ge/files/msap_2013-15_eng.pdf) Accessed 23.04.2026.

<sup>76</sup> The elaboration of the Strategy started in the framework of Mobility Partnership before the Visa Dialogue (2012). The latter supported to the acceleration of work on it resulting in its adoption in 2013 when VLAP was granted.

<sup>77</sup> [https://migration.commission.ge/files/migration\\_strategy\\_2016-2020\\_eng\\_final\\_amended\\_08.2018.pdf](https://migration.commission.ge/files/migration_strategy_2016-2020_eng_final_amended_08.2018.pdf) Accessed 23.04.2026.



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At the final stage, the draft Strategy was circulated among relevant international partners and local NGOs, as well as the representatives of academia, to solicit feedback. The comments received were respectively reviewed by the Working Group and, to a significant extent, incorporated into the final version of the document.

The Migration Strategy 2021–2030 was drafted and adopted based on the experience of the previous two.<sup>78</sup> The strategy was developed under the principle of M&D, which is viewed as an advanced approach aiming at minimizing negative aspects<sup>79</sup> of migration against increasing its positive effects<sup>80</sup>, that in turn should be applied to the maximum for the country's development.

### Readmission Implementation

The Agreement between the EU and Georgia on the Readmission of Persons Residing without Authorization entered into force in 2011.<sup>81</sup> The MIAG was tasked with ensuring its effective implementation, a role it has fulfilled successfully, as evidenced by statistics, indicating that average indicator of the approved readmission applications constituted around 97%.

The technical implementation of the Agreement is supported by the Readmission Case Management Electronic System (RCMES) introduced in 2013, with 19 European states participating in the system, which operates successfully and is widely recognized as an efficient and reliable tool for facilitating the safe return of persons residing in the EU without authorization.<sup>82</sup>

In addition to these developments, Georgia introduced an **Electronic Travel Document** for readmission purposes, complementing the traditional printed document. **This feature has been widely praised as one of the most effective components of the RCMES.**

### Migration Data Collection and Analysis

Unlike Armenia, for which the establishment of a mechanism for migration data collection and analysis is required during the second phase of VLAP implementation, Georgia and Moldova were expected to fulfil this requirement already in the first phase. This difference likely reflects the longer trajectory of EU integration processes in Georgia and Moldova prior to the launch of the VLAP, including the Mobility Partnership, the Eastern Partnership, the European Neighborhood Policy, the AA, and other related frameworks, which had contributed to the development of a certain level of institutional capacity in both countries.

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<sup>78</sup> [https://migration.commission.ge/files/ms\\_2021-2030\\_eng\\_08.02.21.pdf](https://migration.commission.ge/files/ms_2021-2030_eng_08.02.21.pdf) Accessed 23.04.2026.

<sup>79</sup> Such as: emigration of high-skilled citizens and along with it the brain drain and/or failure to fully use own potential and skills; reduction of population, especially of capable workforce and reproductive age; illegal migration, which *inter alia* puts under a significant risk the possibilities for the protection of illegally staying migrants' rights, especially in the cases of women and vulnerable groups; heavy psycho-social situation in migrants' families; etc.

<sup>80</sup> Such as: legal migration; reduction of poverty, business development and access to education and healthcare in the country of origin as a result of proper management of migrant remittances; application in their own country of knowledge and skills gained by returned migrants in developed countries; also, bringing along modern technologies, values, ideas and innovations; diaspora's engagement in the development of the country (investments, development of trade and entrepreneurship, promotion of the country to attract tourists); using immigrants' potential, etc.

<sup>81</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:22011A0225\(03\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:22011A0225(03)) Accessed 23.04.2026.

<sup>82</sup> <https://www.emn.ee/wp-content/uploads/2017/09/acfrogavwinibmylstpgiweofnbsaezrzg3ffr-hiw5y91putidomvbjmnbx-fs-e49lxhlow4wroxveubgb8pl9wq103dckr9nax9wnspgqdiithwhlckz-dkr4nu.pdf> Accessed 23.04.2026.



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Despite the comparatively advanced starting point, though following the assigned timeframe, Georgia required the full duration of both VLAP phases to fully launch effective and functional mechanisms for data collection and analysis.

Across diverse national contexts, the importance of systematic data collection and analysis for effective migration management has been widely recognized. Migration data collection and analysis in Georgia gained bigger prominence following the establishment of the SCMI and the intensification of cooperation with the EU. This process was further accelerated in 2013, when the VLAP provided a solid framework and guidelines for developing a data-processing system and integrating it into a unified migration management mechanism.

But before that, the Migration Profile (MP), which served as a key analytical tool, providing a foundation for systematic analysis of migration data, was first developed in Georgia by International Organization of Migration in 2008.<sup>83</sup> Over the years, this document has been one of the most reliable sources of data on migration. Until 2015, it was produced not by a relevant national state institution, but rather with the assistance of the International Organization of Migration. Georgia's 2015, 2017 and 2019 MPs, being built on the existing MP development experience, aimed to further advance this experience. Accordingly, the purpose of these profiles was to provide not only a comprehensive picture of the migration processes and trends in the country for the years 2010-2018, but also to pilot a qualitatively new Medium Migration Profile (MMP)<sup>84</sup> and a Brief Migration Profile (BMP).<sup>85</sup> As a result, the SCMI gained ownership over the MMP and application of a WoGA principle in respect of migration-related data collection and analysis, as well as improved collection methods and tools for analysis. Since 2015 the MMPs were produced solely by national institution (i.e. the SCMI and its Secretariat).<sup>86</sup> The MMP differs in several aspects from other Migration Profile formats, namely it is extended and light. Its key distinction lies in its balanced integration of data and analysis, with a particular emphasis on assessing the impact of both immigration and emigration on various aspects of the country's development.

The MP was not merely a reporting exercise for the EU. Its primary purpose was to establish a robust system for collecting migration-related data and identifying gaps in existing processes. In this regard, Georgia's experience in producing MPs since 2008 has had a significant positive impact, contributing to the development of the **Unified Migration Data Analytical System (UMAS)**,<sup>87</sup> an innovative, domestically developed ICT solution designed to address migration data gaps specific to Georgia. The system's development commenced in 2014 and culminated in its launch in 2019, following a complex, multi-stage process that included the establishment of a legislative framework, identification of data sources, and the planning and implementation of technical solutions. It integrates the migration-related administrative major data from relevant

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<sup>83</sup> IOM, *Migration in Georgia: A Country Profile 2008*. <https://publications.iom.int/books/migration-georgia-country-profile-2008> accessed: Accessed 23.04.2026.

<sup>84</sup> Within the framework of the SCMI, the development of Georgia's 2015 Migration Profile was carried out by a team of three researchers working on the document on a full-time basis. These researchers—specialists in social sciences, law, security studies, and international relations—worked in close cooperation with the members of the working group. Before starting work these researchers were sent to Vienna University under the patronage of ICMPD to re-master knowledge in the field of MP production.

<sup>85</sup> Brief Migration Profile of Foreign Students in Georgia: [https://migration.commission.ge/files/bmp\\_22\\_students\\_eng.pdf](https://migration.commission.ge/files/bmp_22_students_eng.pdf) accessed: Accessed 23.04.2026..

<sup>86</sup> Elaborated in the frame of the Prague Process. <http://www.imap-migration.org/index.php?id=37> Accessed 23.04.2026.

<sup>87</sup> Developed in cooperation and through the assistance of EU, IOM, ICMPD.



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state agencies involved in migration management based on the Memoranda of Understanding (MoUs), utilizing big data technologies and advanced analytical tools to support more comprehensive and evidence-based policymaking.

The purpose of data on a specific issue of interest, obtained by merging the information gathered from agencies directly involved in migration management and/or its related source entities, is to assist a sector analyst in making a comprehensive analysis. Thus, the UMAS does not provide ready-made answers to tasks, but simplifies the path as much as possible, and reduces the time required for such answers.

### ***Institutional and Legal Framework for Irregular Migration***

Efforts to combat irregular migration were not initially a policy priority for Georgia. In the aftermath of the Rose Revolution,<sup>88</sup> the government's strategic focus was largely oriented toward building an open and liberal economy as a means of accelerating economic development. At the same time, immigration flows into Georgia remained relatively limited and did not present a significant policy challenge. As a result, the government adopted a notably liberal and permissive approach toward migration, including the limited regulatory emphasis on irregular migration. Fighting illegal migration was entrusted to the MIAG, which handled it as part of the general policing function. In practice, however, addressing irregular migration did not constitute a policy priority for law enforcement authorities. Instead, the MIAG was focused primarily on strengthening border control, concentrating efforts on screening and filtering foreign nationals at border entry points to mitigate the risk of potential irregular migrants. This approach resulted in an increased number of entry refusals at border crossing points.

This position was shifted substantially in the context of Georgia's deepening integration with the EU, particularly through the implementation of the VLAP. The benchmarks set under the VLAP elevated irregular migration to a matter of strategic importance, requiring the government to adapt and strengthen its legal and institutional response mechanisms. Consequently, the management of irregular migration was firmly prioritized on the reform agenda.

The reform encompassed significant changes in legislation, governance frameworks and SOPs. In 2014, the Law of Georgia on the Legal Status of Foreign Nationals and Stateless Persons assigned specific powers to the MIAG for combating irregular migration. This required the Ministry to undertake substantial institutional and infrastructural development to effectively enforce its new mandate.

In 2014, the Migration Department was established within the MIAG, which ensured the identification of persons without legal grounds for residing in the country and the implementation of the appropriate expulsion procedures. The Department also became responsible for the implementation of the agreement concluded by Georgia on the readmission of persons residing without authorization. In 2018, the functions of the Migration Department were expanded to include

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<sup>88</sup> <https://www.journalofdemocracy.org/articles/georgias-rose-revolution/> Accessed 23.04.2026.



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the responsibility for the implementation of the right to asylum in Georgia.<sup>89</sup> Several internal legal guidelines and SOPs were subsequently adopted to support the introduction of new practices in enforcing legislation on irregular migration and asylum, including procedures for identification, detention, return, and expulsion.

Mechanisms for intra-agency, inter-agency, and international cooperation had been introduced to effectively fight irregular migration. In the intra-agency context, the Coordination Group for the Fight against Irregular Migration was established within the MIAG. The Group was composed of representatives from different departments of the MIAG. The Group's objective was to develop a unified strategy of the Ministry for irregular migration-related issues and improve its management process. Since then, Coordination Group's meetings have been held on a regular basis.<sup>90</sup>

The Temporary Accommodation Center (TAC) for persons staying in Georgia without legal grounds has been operational under the Migration Department since 2014. The Center complies with international standards for detention of migrants, safeguarding all respective human rights. It was built based on exploring the experience of some EU countries.<sup>91</sup> Accommodated persons have access to sufficient recreational activities (television, reading, games, etc.). Access to the open air during most of the day is ensured, and migrants accommodated in the TAC maintain meaningful contact with the outside world. The Foreigners' Rights Protection and Monitoring Unit of the Migration Department is responsible for monitoring the protection of the rights of those migrants placed in the TAC.

Despite significant progress, the Migration Department continued to face a number of structural and operational weaknesses. In the absence of detailed regulatory frameworks, established practices and national-level analytical systems for identifying irregular migrants, the Department initially relied heavily on police support. As a result, it took time for the institution to become fully operational in terms of the enforcement of expulsion procedures, although it demonstrated a strong performance in the area of readmission.<sup>92</sup>

Later, expulsion and return (removal) procedures were substantially reformed and consolidated within a single authority to improve efficiency and reduce the administrative burden. Before 2014, decision-making and enforcement powers were divided between courts and the Ministry of Justice, while the MIAG enforced their decisions. Greater emphasis was placed on administrative decision-making within MIAG in certain cases. Moreover, judicial scrutiny over the MIAG decisions if appealed, was retained as an important safeguard for the protection of fundamental rights. The reform concentrated significant authority in expulsion/return management into the Migration Department, which became a single agency to decide and enforce expulsion in the majority of cases. While such decisions could be appealed it did not automatically suspend enforcement. In cases involving disputed legal status or security considerations, decisions were referred to the courts, which were limited to issuing rulings within a month.

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<sup>89</sup> <https://www.matsne.gov.ge/ka/document/view/4305716?publication=0> Accessed 23.04.2026.

<sup>90</sup> Interview with Vakhtang Gabrichidze, former head of Migration of Department of the MIAG.

<sup>91</sup> Ibid.

<sup>92</sup> Ibid



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### Asylum Policy

The asylum domain also underwent significant reforms in response to VLAP requirements. These reforms were implemented at a later stage, following the establishment of the broader migration management framework and the operationalization of the Migration Department within the MIAG. Initially, the responsibility for asylum laid with the Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia.<sup>93</sup> It is important to note that the number of asylum seekers began to increase even before the VLAP and continued to rise throughout the implementation period and beyond. It became evident that the government needed to take additional measures to strengthen its effectiveness in this area, going beyond the VLAP agenda.

In 2016, once the MIAG had developed sufficient institutional capacity in irregular migration management, the Law on International Protection was enacted. The law transferred all competences from the Ministry of Internally Displaced Persons from the Occupied Territories, Accommodation and Refugees of Georgia to the MIAG, consolidating all authority and related legal procedures within a single institution.<sup>94</sup>

Beyond restructuring the governance framework, the new law refined asylum procedures and made them more applicant-oriented by introducing broader grounds for granting humanitarian status in line with UN and Council of Europe standards. Decision-making authority on granting or rejecting asylum was elevated to the ministerial level and decisions were subject to judicial review. As a result, the reform was positively assessed by human rights organizations.

Under the new framework, asylum seekers were allowed either to reside in temporary accommodation facilities or to remain in the country based on a decision of the MIAG during the procedure, which lasted up to six months and could be extended by up to nine additional months.<sup>95</sup> A key innovation introduced by the 2016 law was the accelerated procedure, establishing simplified processing and a final decision within one month in cases where the sufficient evidence indicated that an application was based on obviously false grounds or the applicant originated from a safe country. This mechanism proved effective in addressing the misuse of the right to seek asylum.

It should also be underlined that, in addition to judicial scrutiny, the asylum domain has been subject to continuous monitoring by the Public Defender of Georgia, which provides regular assessments.<sup>96</sup>

The Government of Georgia and the MIAG undertook a comprehensive revision of the bylaws regulating nearly all key aspects of the asylum. This process facilitated the introduction of new practices and institutional approaches, as asylum represented a relatively new policy domain for the MIAG. Extensive training programs were delivered for relevant MIAG personnel, including the Border Police, Patrol Police, and Migration Department staff, to familiarize them with the new standards and legislative framework. Particular emphasis were placed on training officers at border crossing points and ensuring the availability of relevant information in multiple languages.<sup>97</sup>

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<sup>93</sup> <https://www.matsne.gov.ge/en/document/view/1531916?publication=8> Accessed 23.04.2026.

<sup>94</sup> <https://www.matsne.gov.ge/en/document/view/3452780?publication=8> Accessed 23.04.2026.

<sup>95</sup> EU standard at that time was 21 months.

<sup>96</sup> See the 2015-year report of the ombudsperson: <https://www.ombudsman.ge/res/docs/2019041311360425034.pdf> Accessed 23.04.2026.

<sup>97</sup> Interview with Vakhtang Gabrichidze, former head of the Migration Department of the MIAG.



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Despite these efforts, certain challenges related to the integration of asylum seekers persisted even after the introduction of the visa-free regime. For instance, comprehensive integration programs were only launched in 2020.<sup>98</sup>

### **Assisted Voluntary Return**

The Assisted Voluntary Return (AVR) was introduced in Georgia based on the law on the Legal Status of Foreign Nationals and Stateless Persons, enacted under the VLAP reforms.<sup>99</sup> The implementation of return-related procedures, including voluntary departure, falls under the competence of the Migration Department of the MIAG.

Pursuant to an expulsion decision, a foreign national or stateless person may, upon request, be granted the opportunity to leave Georgia voluntarily within a period of 7 to 30 days. During this period, departure is organized at the individual's own expense, without costs incurred by the state budget. The timeframe may be reduced in cases where there is a risk of evading departure or concerns related to public order.

During the voluntary departure period, proportionate supervisory measures may be imposed to mitigate the risk of non-compliance. These may include the obligation to provide a financial guarantee (bail), surrender travel or identity documents, or to comply with other statutory requirements.

One of the main incentives for AVR is the possibility of avoiding a re-entry ban. As a general rule, individuals subject to expulsion are barred from re-entering Georgia for a period of at least five years, whereas this restriction may not apply in cases of voluntary departure. In addition, voluntary departures were widely supported by the IOM office in Georgia, which included providing logistical support (Flight tickets and in some cases, assistance to obtain necessary travel documents).<sup>100</sup> However, such assistance is currently limited.

Despite of the decreased support from the IOM office in Georgia and the increasingly frequent imposition of re-entry bans, a significant number of foreign nationals still opt for voluntary departure at their own expense. This is largely driven by the intention to avoid re-entry restrictions, as well as to bypass lengthy expulsion procedures and the associated risk of detention.

## **6.3. Migration Management and Asylum in the Republic Moldova**

### **Development of the institutional framework for migration management**

The pre-VLAP institutional architecture for migration management in the Republic of Moldova was significantly underdeveloped. At the strategic level, governance structures and policy planning mechanisms were either weak or entirely absent, while the overall system for migration

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<sup>98</sup> <https://ombudsman.ge/res/docs/2022112910515554564.pdf> Accessed 23.04.2026.

<sup>99</sup> <https://www.matsne.gov.ge/en/document/view/2278806?publication=20> Accessed 23.04.2026.

<sup>100</sup> <https://georgia.iom.int/return-from-georgia> Accessed 23.04.2026.



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and asylum remained fragmented and poorly coordinated. Rather than reflecting an integrated, service-oriented model of migration governance, the domain was predominantly framed through a law enforcement lens, with primary responsibility vested in police structures focused on control and coercive enforcement.

Initial efforts to strengthen state capacity in migration management began with the establishment of the BMA on 20 July 2006, as a subordinated body under the MIARM, marking an early step toward institutional consolidation in this domain. The BMA (Currently the General Inspectorate for Migration under the MIARM) was mandated for migration management and asylum issues in line with Moldova's international commitments in the fields of labor migration and international protection. However, despite its formal establishment, the BMA remained constrained in both authority and operational capacity, limiting its ability to deliver migration management in accordance with EU standards. In particular, prior to the launch of the VLAP, the BMA lacked competence, organizational architecture, advanced information management systems and interoperable data infrastructure, regional presence and human resources, which significantly hindered overall effectiveness and the broader modernization of migration and asylum governance.

In 2010, as an initial step in advancing migration management reforms under the VLAP, the Government established the Coordination Commission on Migration and Asylum Activities (CCMAA/Commission). The Commission ensured a comprehensive, inter-institutional framework for migration management, border control, and asylum procedures, bringing together the competences of multiple central public authorities and fostering cross-sectoral coordination. Functioning as a permanent advisory body to the Government, the CCMAA convened as required and at least once per quarter. The MIARM led to the work of the CCMAA. The Commission was composed of the MIARM, the BMA, the Border Police, the Center for Combating Trafficking in Human Beings, the Ministry of Labor, Family and Social Protection, the National Employment Agency, the Ministry of Foreign Affairs and European Integration, the General Directorate for Consular Affairs, the MITC, the Ministry of Economy, the Ministry of Education, the Bureau for Relations with Diaspora, and the Bureau of Interethnic Relations. Representatives of civil society were also involved in the work of the CCMAA in a consultative capacity.

The main peculiarity of the Moldovan horizontal cooperation model was that in the Commission, several subordinated agencies, such as the Border Police and the BMA were represented alongside the MIARM itself. Such an approach ensured a dominant position of the MIARM within the CCMAA.

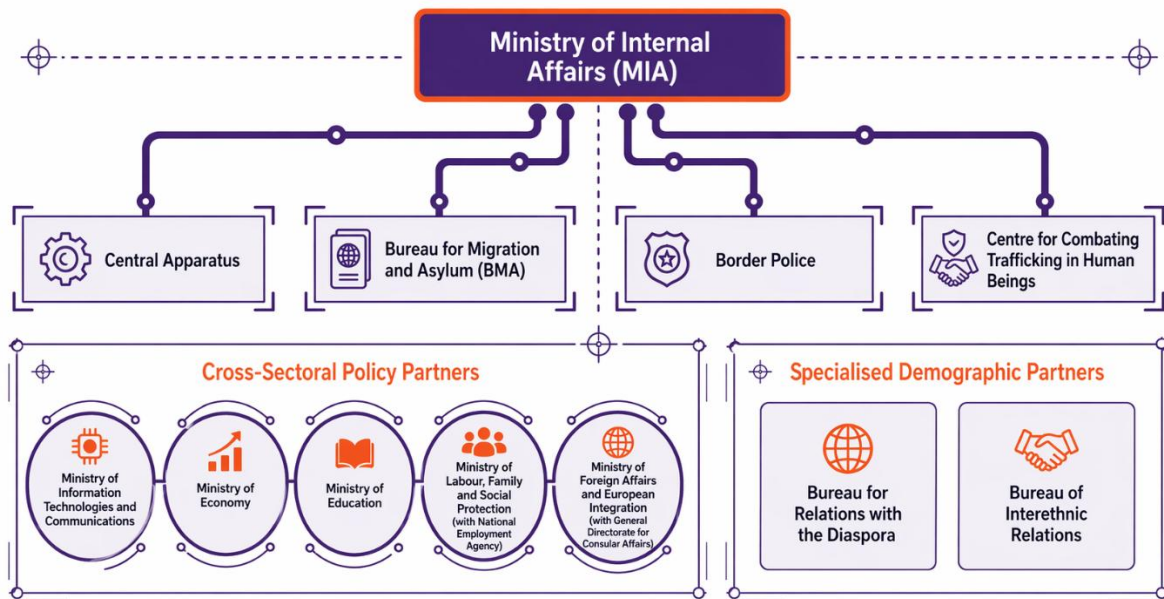


Figure 5 The structure of the Coordination Commission on Migration and Asylum Activities

**The Commission’s mandate encompassed several core functions:**

- Contributed to the development and implementation of state policies and strategies in migration management, including combatting irregular migration.
- Promoted cooperation among governmental institutions, civil society, and international organizations.
- Provided monitoring of the implementation of migration-related action plans and policy documents, reviewed analytical and project outputs, and issued recommendations for adjustment of national policy to enhance effectiveness, including resource allocation.
- Facilitated coordination among competent public authorities in the management and oversight of migration processes.

The CCMAA proved particularly effective as a coordination mechanism during the reform of the legislative framework. Its platform facilitated the development and adoption of several key regulatory and cooperative instruments in 2011, including co-ministerial decrees establishing procedures for the medical examination of migrants; measures governing the documentation and monitoring of foreign nationals serving criminal sentences in the Republic of Moldova; and inter-agency agreements on information exchange involving the MIARM, the Ministry of Foreign Affairs and European Integration, and the Ministry of Labor and Social Protection. In addition, technical arrangements were introduced to enable data exchange between the BMA and the MITC, supporting the issuance of identity documents to foreign nationals (2011–2013).

The CCMAA platform was further instrumental in advancing operational coordination, notably through the development and adoption of the Cooperation Agreement between the BMA and the Border Police in 2013, aimed at strengthening the prevention and combating of irregular migration both at the border and within the territory of the Republic of Moldova.



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However, despite the Commission facilitating the involvement of a broad range of stakeholders in the policy planning process, policy drafting functions and key enforcement powers remained highly centralized within the MIARM. The primary responsibility for policy development was concentrated in the central apparatus of the MIARM, while the BMA did significantly contribute to analysis, policy design and drafting, despite its predominantly operational authority. This institutional configuration reflects a governance model in which, regardless of the existence of horizontal coordination mechanisms, the strategic authority and implementation functions remain asymmetrically distributed and concentrated under the MIARM.

By 2014, migration management in the Republic of Moldova had undergone substantial reform, marking a critical phase in the consolidation of institutional capacity. The BMA was considerably strengthened, with expanded competences and increased resources enabling it to administer both short- and long-term stay of foreign nationals, including individuals in an irregular situation. Its mandate was further broadened to include the registration of all categories of foreign nationals residing in the country, including stateless persons and applicants for international protection.

Institutional capacity enhancement was reflected, *inter alia*, in the increase in personnel from 82 to 185 staff members.<sup>101</sup> More broadly, the BMA's operational and administrative capabilities were reinforced through a combination of increased state budget allocations and sustained donor support. This period also demonstrated notable organizational expansion, including the establishment of regional offices across the North, the Centre, and the South of the country, thereby improving territorial coverage and service delivery in migration management.

As a result of institutional reforms, the main competences of the BMA were determined as following: to participate in the development and implementation of national policy on immigration, statelessness, and asylum, draft and apply reform strategies in the field of migration, statelessness, and asylum, manage and monitor migration flows, submit proposals for the adjustment of national legislation, implement international legal instruments in the field, enforce the legislation in the field of migration, statelessness and asylum, as well as the other regulatory and legislative acts concerning this domain, prevent and fight illegal stay of foreigners, implement readmission agreements of Moldovan citizens and third countries nationals, manage asylum issues.

One of the key innovations introduced for meeting the VLAP requirements was the establishment of a one-stop-shop system for Moldovan citizens and foreign nationals, entrusting the BMA public service functions at the central and regional levels. It marked a significant step in Moldova's migration management reform, transforming previously fragmented and institution-heavy procedures into a centralized, user-oriented service model. Under this system, foreign nationals can complete key administrative processes, through a single administrative interface, rather than navigating multiple agencies. This reform was particularly important as it simultaneously addressed several structural challenges: it improved administrative efficiency by reducing duplication and processing times; strengthened migration control through better data collection and sharing, identity verification, and inter-agency coordination; and enhanced accessibility and transparency for applicants by providing a clear and predictable entry point into the system.

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<sup>101</sup> Interview with former officials of the BMA involved in the VLAP implementation.



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At the same time, the model not only aligned with EU standards under the VLAP framework but also advanced Moldova's broader strategic objectives by facilitating legal migration for economic purposes, including the attraction of foreign workers, investors, and students. Overall, the one-stop-shop reform reflects a shift toward a more integrated and service-oriented migration management system that balances regulatory control with facilitation and responsiveness to user needs.

The BMA, through one-stop shops, is responsible for the following services:

- ✓ Provide consultations to both natural and legal persons (foreign nationals and citizens of the Republic of Moldova).
- ✓ Inform applicants about the process of submitting requests, required documents, validity periods, applicable fees, and services offered, as well as the procedures for issuing or requesting identity documents.
- ✓ Receive applications for all types of services provided.
- ✓ Ensure the accuracy and completeness of the data submitted.
- ✓ Verify the authenticity and legality of the documents presented.
- ✓ Carry out dactyloscopy (fingerprint) registration of foreign applicants for residence rights.
- ✓ Take digital photographs of applicants.
- ✓ Collect digital signatures.
- ✓ Process and transmit information into operating systems.
- ✓ Issue identity cards.
- ✓ Receive asylum applications (regional services).
- ✓ Receive applications for integration (regional services).

The functioning of the one-stop-shop system relied on sustained coordination among multiple public authorities. In practice, this included structured interaction between the BMA and key institutions such as the MITC, particularly for identity verification and data exchange (including police channels), the National Employment Agency for labour-related procedures, and the Ministry of Economy in cases involving foreign investors, among others.

This inter-institutional arrangement significantly streamlined administrative processes, thereby reducing procedural fragmentation and improving efficiency. At the same time, the effectiveness of the one-stop-shop model was contingent upon more than coordination alone. It required substantial investments in interoperable information systems, robust data protection frameworks, secure data exchange mechanisms, and continuous staff training, alongside regular system maintenance.

Additionally, Moldova introduced an electronic visa (e-Visa) system on 1 August 2014, enabling foreign nationals to submit visa applications online and thereby simplifying and streamlining visa issuance procedures.

One of the defining features of the Moldovan approach is the concentration of functions within the BMA, which simultaneously acts as a contributor to policy planning, the main analytical hub for migration-related data, a decision-making authority on immigration matters, an enforcement



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body responsible for combating irregular migration, and a provider of public services in the migration field. This multifunctional configuration reflects a highly centralized governance model, combining regulatory, control, and service delivery roles within a single institution.

### **Development of the legal framework for migration management**

Before 2011, migration in the Republic of Moldova was regulated through a set of separate legislative acts, most notably the Law on Labor Migration, which addressed labour migration and the social protection of workers, and the Law on the Regime of Foreigners, which established the conditions for the entry and residence of foreign nationals. The implementation of the VLAP prompted a substantial revision of this legal framework to ensure compliance with EU requirements, including alignment with key provisions of Directive 2008/115/EC on the return of illegally staying third-country nationals.

As a part of the refinement of Moldovan legislation for ensuring compliance with EU regulations, the following laws and bylaws were adopted/amended:

- Law on the Regime of Foreigners in the Republic of Moldova No 200/ from 6 July 2010.
- Law on state border of the Republic of Moldova No 215 from 4 November 2011.
- Amendments to the Contravention Code of Moldova No 218 of 24 October 2008.
- Amendments to the Government Decision “Regarding measures in the national passport system” No 376 from 06 June 1995 - staying rules of foreigners and stateless persons on Moldovan territory.
- Governmental Decision “Regulation on issuing identity documents and evidence of inhabitants of the Republic of Moldova” No 125 from 18 February 2013.

One of the most significant challenges concerned the status of individuals residing in Moldova’s breakaway region of Transnistria. The absence of reliable civil documentation and the ambiguous legal status of persons living in the region created substantial difficulties in determining whether such individuals should be treated as Moldovan citizens or as migrants. This ambiguity was further compounded by the fact that many individuals did not engage with the BMA to legalize their status.

At the same time, the Moldovan authorities faced structural limitations in exercising effective migration control over movements to and from the region. While the registration of foreign nationals was typically conducted at official border crossing points, this mechanism did not apply to the internal administrative border with the breakaway Transnistrian Region (the left bank of the Dniester River). Entry into the government-controlled territory from Transnistria, as well as through segments of the Moldova–Ukraine border adjacent to the region, occurred outside standard border control procedures. As a result, the authorities had limited capacity to monitor, register, and manage migration flows originating from those territories.

To address this issue, the Government Decision No. 125 of 18 February 2013, “Regulation on the Issuance of Identity Documents and Registration of Residents of the Republic of Moldova,” was adopted. The solution was found by installing internal control posts where visitors from Transnistrian region could register. Moreover, the foreign nationals who entered the Republic of



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Moldova through the Transnistrian part of the Moldovan-Ukrainian state border uncontrolled by the Moldovan authorities and did not register at the internal control posts, were obliged, by the Government Decision, within 72 hours to declare their presence on the territory of Moldova to the following authorities: (a) any subdivision of the BMA or (b) any Subdivisions of the Centre for State Information Resource 'REGISTRU' of the MITC. According to the legislative amendments, the multi-agency, electronic Integrated Information System Migration and Asylum (SIAMA) was created for the BMA to provide registration of the migrants and to unify data.

This development is widely regarded as one of the most significant achievements associated with visa liberalization. Following the introduction of Visa-Free Travel with the EU, a substantial number of residents from the Transnistrian region, who had previously been reluctant to engage with Moldovan administrative procedures, became willing to obtain Moldovan identity documents. This shift enabled Moldovan authorities to expand civil registration coverage and improve the accuracy of population data in the conflict-affected region. In this respect, visa liberalization produced important indirect effects, contributing to the strengthening of administrative presence and improved population registration in the Transnistrian region.

### **National Migration Policy**

Prior to the VLAP process, the Republic of Moldova lacked a sufficiently unified and coherent public policy framework in the field of migration, resulting in institutions developing and promoting separate policy documents with limited coordination. The VLAP process played a critical role in raising awareness of Moldovan authorities of the need for a consistent, comprehensive, and transparent strategic planning for directing national efforts.

At the initial stage, the MIARM and its subordinate bodies possessed limited experience and institutional capacity for drafting high-level policy documents. During the VLAP process, this capacity was progressively strengthened through international assistance, including the EU technical assistance instruments and support from international organizations. Consequently, strategic documents and action plans were increasingly developed by national authorities, including the MIARM and the BMA, with the support of donor-funded experts.

Public policy documents prior to their approval by the Government, required mandatory endorsement from the Ministry of Finance, the Ministry of Foreign Affairs and European Integration, and the Ministry of Economy, and optionally other institutions whose competences were directly impacted by their provisions.

The CCMAA platform was utilized in the migration policymaking process to facilitate consultations within the government agencies whose endorsement was necessary, also with non-governmental organizations, international actors, and development partners, thereby promoting inclusiveness and stakeholder participation. As a result, the National Strategy on Migration and Asylum (2011–2020) was adopted, representing the first comprehensive and integrated policy framework governing migration in the Republic of Moldova, marking a shift from fragmented, sector-specific approaches to a coordinated model.

Although the Strategy was set for a long-term period (2011–2020), the Action Plan for the implementation of this strategy was designed for a medium-term period (2011–2015). Thus, the



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Strategy defined the overall approach and development directions of the field, while the Action Plan outlined the concrete activities to achieve them.

The Strategy served as a comprehensive regulation of the management of migration and asylum processes, aimed at harmonizing the national legal framework with the provisions of international law and the EU standards. It covered key areas such as legal migration, prevention of irregular migration, asylum and international protection, integration of foreign nationals, and diaspora engagement.

### **Readmission Implementation**

Readmission is regulated by Law no. 200, 16.07. 2010 On the Regime of Foreigners in the Republic of Moldova, and the Government Decision on 7.07.2011 „On the approval of Regulations on the procedures of returning, expulsion and readmission of foreigners from the territory of the Republic of Moldova” in accordance with the provisions of the Directive 2008/115/EC of the European Parliament and Council of December 16, 2008 on the common standards and procedures applicable by the Member States for the returning of illegally staying third-country nationals.

In 2007-2011, the Republic of Moldova signed readmission agreements with EU member states, former Soviet Republics, the Middle East countries, etc. During the VLAP implementation, the readmission system had already been operational under the BMA.

The BMA has remained a competent authority for the implementation of the Readmission Agreements. It exchanges data with competent authorities of contracting states and provides operations for transferring Moldovan and third-country nationals. The BMA cooperates with partner countries and responds to any notification of readmission cases and has allocated funds from the state budget for the implementation.

The BMA has close cooperation with FRONTEX (the European Border and Coast Guard Agency), which provides significant support for Moldovan authorities. The MIARM and the BMA permanently participate in the readmission meetings between Moldova and the EU. The readmission of Moldavian nationals decreased considerably in the process of VLAP implementation.

### **Migration Data Collection and Analysis**

Prior to the VLAP, functions related to migration data collection and analysis were dispersed across multiple institutions, resulting in a fragmented and largely ineffective system. The absence of centralized data management and limited analytical capacity constrained evidence-based policymaking and operational planning in the field of migration.

The VLAP-driven reforms contributed significantly to the development of a more advanced and integrated system of migration data collection and analysis. This was achieved primarily through the strengthening of institutional capacities within the BMA, including the enhancement of analytical functions, the expansion of human resources, and targeted investments in digital infrastructure.



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Especially, digitalization played a central role in this transformation by enabling the BMA to establish interoperable connections with the databases of other public authorities. In this context, the BMA built up and consolidated its own informational system, which at the same time was an integral part of the SIIAMA. Data for risk analysis was also obtained from the Border Police databases. This system functioned as a comprehensive platform for the processing of personal data of foreign nationals, supporting the execution of legal functions related to admission, stay, and return. The processing and protection of personal data was carried out in accordance with national legislation on personal data protection, ensuring compliance with relevant legal and security standards.

During the VLAP implementation, the MP evolved into more structured and policy-relevant instruments and the first EMP was introduced. This period saw increased emphasis on data integration, inter-institutional coordination, and the strengthening of analytical capacities within national authorities, particularly the BMA. The VLAP framework also incentivized the standardization of data collection methodologies and alignment with EU reporting requirements, thereby improving the reliability and comparability of migration statistics. As a result, the EMP became an integral component of evidence-based policymaking, supporting strategic planning and monitoring progress in migration and asylum reforms, and contributing to the broader institutionalization of migration data systems in the Republic of Moldova.

### ***Institutional and Legal Framework for Irregular Migration***

Prior to the implementation of the VLAP, practices aimed at addressing irregular stay were largely ineffective, reflecting both organizational deficiencies and limited institutional capacity within law enforcement structures. Moldovan Police authorities faced significant challenges in structuring and managing operational processes, which constrained their ability to respond effectively to irregular migration.

These limitations were further exacerbated by the inappropriate distribution of resources, with operational and administrative capacities heavily concentrated in the capital, while regional units remained under-resourced and lacked the necessary organizational capabilities to address migration-related challenges in a consistent and coordinated manner.

One of the main institutional reforms invoked by the VLAP was the transfer of the function of combating irregular migration from the police to a specialized body – the BMA and strengthening of its operational capacity. Under the BMA, the Directorate for Combating Illegal Stay was established, composed of the Section for Combating Illegal Stay and the Section for Returns and Restrictive Measures, as well as the territorial services. All employees of the BMA responsible for the enforcement of identification, detention and expulsion procedures have the status of police officers. After the reform of the BMA, the police no longer have any competence in combating illegal stay. The transfer of functions from the police to the BMA contributed to the further modernization of the SIIAMA.

The BMA administers special infrastructure for the accommodation of the illegal migrants taken into custody. The facility existed even before the VLAP, however during the reform process, it was modernized and upgraded to EU standards.



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Expulsion and return (removal) procedures were simplified, with the primary responsibility for enforcement entrusted to the BMA. Moldovan legislation distinguishes between expulsion and return (removal) procedures. Expulsion applies in cases where a foreign national has committed a crime or other violation of law. In such instances, decisions are issued by courts and enforced by the BMA.

By contrast, return procedures are administrative in nature. Amendments to the Law on the Regime of Foreigners in the Republic of Moldova empowered the BMA to issue return decisions in cases involving unidentified persons, as well as foreign nationals who have not voluntarily left the territory within the prescribed period, have crossed or attempted to cross the state border illegally, have entered the country despite an existing entry ban, or have been declared undesirable. The judiciary is nevertheless involved in the process and constitutes a guarantor of human rights, as foreign nationals are eligible to appeal the BMA decisions to the court.

Several SOPs were adopted to operationalize legislation and to introduce or refine practices related to the expulsion of foreign nationals from the national territory, assisted voluntary return, the designation of individuals as undesirable, removal under escort, detention, and the imposition of entry bans. These reforms were accompanied by targeted capacity-building, ensuring that staff were adequately prepared to implement the new provisions, thereby strengthening institutional performance and improving the delivery of services.

### **Asylum Policy**

The responsibility for asylum matters in the Republic of Moldova was initially assigned to the Ministry of Social Protection and Family, through the Section for Coordination and Monitoring of Issues concerning Asylum Seekers and Refugees, established in 2001. But later, in 2006, this function was transferred to the MIARM, marking a shift toward a more security-oriented governance model. Since then, asylum-related functions have been administered by the BMA.

The adoption of the Law on Asylum in 2008 established the primary legal framework governing asylum procedures. This domain underwent further significant reforms under the VLAP, leading to the institutional strengthening of asylum management. In particular, the Directorate of Asylum and Integration was established within the BMA as a dedicated structural unit responsible for asylum and integration functions.

The Directorate is responsible for maintaining and managing individual case files, producing statistical reports, and examining applications for the determination of statelessness. It conducts the administrative processing of asylum applications, including case assessment, interview procedures, file preparation, and the drafting of decisions. In addition, it provides counselling and support to foreign nationals on issues related to social and local integration, including access to education, healthcare, and accommodation services. The Directorate also manages the Reception Centre for asylum seekers and refugees, ensuring the provision of basic reception conditions in line with national and international standards.

The Directorate of Asylum and Integration functions as the sole administrative authority responsible for the examination of asylum applications in the Republic of Moldova. Applications may be submitted directly to the Directorate within the BMA, as well as to other competent



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authorities, including the Border Police and other police units subordinated to the MIARM, as well as penitentiary institutions under the Ministry of Justice.

Asylum applications may be lodged either within the territory of the Republic of Moldova or at designated border crossing points; applications submitted from outside the country are not accepted. Where an application is submitted to an authority other than the BMA, the receiving institution is legally obliged to promptly transfer the application to the competent authority for examination.

If an asylum is requested at the border, the border police must ensure the asylum-seeker's access to the territory of the Republic of Moldova only after notification of and permission from the BMA. The BMA representative either receives the asylum seeker at the border or issues permission allowing the asylum seeker to the country. In this case, the asylum seeker is obliged to visit the BMA office for registration within 24 hours of border crossing.

In standard cases, the BMA has up to six months to decide on granting asylum or rejecting an application. The procedure may be extended; however, its total duration must not exceed nine months. If an applicant withdraws the application during the procedure, the process is terminated, and the applicant assumes the status of a regular foreign national, with the corresponding legal consequences.

To address the problem of manipulation of asylum applications, an “accelerated procedure” was introduced even prior to the VLAP.<sup>102</sup> The accelerated procedure lasts 15 days and applies to abusive or manifestly unfounded applications, as well as to applications submitted by individuals who pose a risk to national security or public order. The 15-day time limit, along with additional procedural safeguards, was further reinforced after the VLAP in response to earlier cases in which the individuals held in penitentiary institutions or subject to extradition proceedings applied for asylum to benefit from transfer to accommodation centres. Even though during the VLAP implementation period, the accommodation centre for asylum seekers was renovated, until 2016, there was no strict obligation for all applicants to be accommodated there, due to the limited capacity of the facility.

The temporary identity document for temporary asylum-seekers is valid for a period of 30 days, with the possibility of it being extended for subsequent 30-day terms, until the final decision on the application. Every refugee receives an identity card valid for a period of 5 years. A beneficiary of humanitarian protection receives an identity card valid for 1 year. Travel documents for refugees shall be issued for a period of 2 years. Travel documents for the beneficiary of humanitarian protection shall be issued for a period of 1 year.

During the VLAP implementation in the Republic of Moldova, the number of beneficiaries of humanitarian protection was twice as high as the number of refugees.

### **Assisted Voluntary Return**

AVR in the Republic of Moldova was introduced during the VLAP implementation period with financial support from the IOM. Eligibility for AVR was defined broadly and included migrants who

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<sup>102</sup>[https://www.legis.md/cautare/getResults?doc\\_id=136582&lang=ro](https://www.legis.md/cautare/getResults?doc_id=136582&lang=ro) Accessed 23.04.2026.



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wished to return to their country of origin and required support during the return and reintegration process.

IOM Moldova implemented AVR programs in partnership with national authorities, including the BMA, ensuring that procedures were conducted in a lawful and voluntary manner. The organization developed individualized return and reintegration plans for beneficiaries, typically formalized through agreements outlining mutual responsibilities. In addition, analytical studies<sup>103</sup> were conducted to assess the return of migrant workers and its broader socio-economic impact on the Republic of Moldova.<sup>104</sup>

AVR programs included a comprehensive package of support measures, such as pre-return counselling, provision of information, logistical and financial assistance, support in obtaining necessary travel and legal documents, and limited reintegration assistance to cover basic needs upon return.

Moldova continues to implement AVR programs in cooperation with IOM. For example, the National Action Plan for the Accession of the Republic of Moldova to the EU for 2024–2027 envisages further improvement of legal and institutional frameworks in the field of readmission and AVR.

### 6.4. Comparative Assessment

**The Moldovan and Georgian experience analysis of migration management and asylum reforms demonstrates the following key similarities:**

- Strategic governance and policy planning evolved towards more structured interagency coordination, primarily through specialized CMMs unifying relevant line ministries. Transparent and consistent policy planning - supported by the adoption and application of national strategies and action plans, became an integral component of migration governance and management. While policy planning and monitoring cycles were largely maintained through domestic resources, donor support played an important complementary role, particularly in policy development and institutional capacity-building.
- The national legislations in both countries experienced substantial modernization for the alignment with international practices and EU legislation.
- Analytical capabilities were strengthened through applying expert consultations, extensive digitalization, database consolidation, and targeted allocation of human resources. Although digitalization was primarily driven by in-house capacities, it was supplemented by donor assistance. Over time, analytical functions became a key element supporting

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<sup>103</sup>

[https://moldova.iom.int/sites/g/files/tmzbd11626/files/documents/Profilul%20Migra%C8%9Bional%20Extins%20al%20Republicii%20Moldova%202009-2014\\_0.pdf](https://moldova.iom.int/sites/g/files/tmzbd11626/files/documents/Profilul%20Migra%C8%9Bional%20Extins%20al%20Republicii%20Moldova%202009-2014_0.pdf) Accessed 23.04.2026.

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[https://old.brd.gov.md/sites/default/files/document/attachments/06\\_studiu\\_ilo\\_reintoarcerea\\_lucratorilor\\_migranti\\_si\\_desvoltarea\\_rm\\_2014\\_rom.pdf](https://old.brd.gov.md/sites/default/files/document/attachments/06_studiu_ilo_reintoarcerea_lucratorilor_migranti_si_desvoltarea_rm_2014_rom.pdf) Accessed 23.04.2026.



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policy planning, international cooperation, and the management of both regular and irregular migration.

- First analytical products, Migration Profiles, were developed heavily depending on the donor support, particularly the IOM and ICMPD.
- Both countries consolidated responsibilities related to irregular migration and readmission within specialized agencies, replacing the pre-VLAP reliance on general policing structures.
- Both countries introduced accelerated/simplified procedures for asylum case management when violations of law or national security threats were obvious to mitigate the manipulative use of asylum rights.
- Both countries introduced AVR Practices as a part of VLAP-triggered migration management reforms.
- Both Georgia and the Republic of Moldova proactively held regular dialogues within the EU Readmission Committee, where data, figures, and trends related to their nationals present in the EU were reviewed.
- Finally, administrative procedures were further strengthened through the adoption of SOPs, continued digitalization, and comprehensive training of relevant personnel.

### **Despite many similarities, the study identifies the following key differences:**

- In the Republic of Moldova, the coordination mechanism is mainly dominated by the MIARM, reflecting a strong vertical integration of functions across analysis, policy planning, and operational management. By contrast, the model in Georgia is based on a more balanced, horizontal distribution of responsibilities, with policy planning and analytical coordination led by the SCMI's Secretariat under the Ministry of Justice, while the MIAG primarily focuses on enforcement and international protection functions.
- At the operational level, Moldova has consolidated the majority of enforcement functions, including service delivery, risk analysis, decision-making, and coercive measures, within a single specialized agency (the BMA). In Georgia, these functions are distributed across multiple institutions.
- Finally, differences are also evident in strategic planning approaches. Moldova adopted a longer-term strategy covering the period 2011–2020, whereas Georgia at that moment followed shorter, four-year strategic planning cycles.<sup>105</sup>
- Key strengths identified by the study: (1) establishment institutional coordination mechanisms CMMs that enable inclusive decision-making and align interrelated policy areas across stakeholders, (2) consolidation of migration policy planning and enforcement functions within a single institution contributed to greater resource and operational efficiency, (3) concertation of administrative procedures related to expulsions/returns within specialized authorities, (4) integration of new technological solutions, such as UMAS and SIIAMA, in analytical process, (5) introduction of accelerated procedures for asylum decisions (6) introduction of AVR systems.

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<sup>105</sup> See further Georgia's 2021-2030 Migration Strategy (i.e. Background, Long term Vision and Methodology): [https://migration.commission.ge/files/ms\\_2021-2030\\_eng\\_08.02.21.pdf](https://migration.commission.ge/files/ms_2021-2030_eng_08.02.21.pdf) Accessed 23.04.2026.



The main **weaknesses** singled out by the study: (1) heavy dependence on donor assistance in the development of policy planning and analytical cycle, (2) relatively low quality of initial policy documents.

## Chapter 7. Lessons Learned and Recommendations

This chapter brings together the main lessons from the experiences of Georgia and Moldova in implementing the VLAP in selected areas and translates these lessons into practical recommendations for Armenian stakeholders.

The study demonstrates that, despite shared post-Soviet governance legacies, comparable challenges related to the breakaway region of Transnistria and the occupied territories of Abkhazia and Tskhinvali Region, as well as similar requirements under the VLAP, the reform trajectories of Georgia and Moldova, especially in the areas of document security and migration management, diverged significantly. At the same time, several core elements of the reform process display notable convergence and a high degree of effectiveness, especially in the organization and coordination of the VLAP implementation.

This diversity of approaches provides practical value for Armenia, offering a range of adaptable models for designing context-specific reforms. However, across both countries, reforms in the examined domains were driven through three main pathways: (1) the comprehensive modernization of legislative frameworks, accompanied by the development of detailed secondary regulations and operational procedures; (2) the large-scale digitalization of systems and administrative processes; and (3) the sustainable human resource development through targeted and continuous training, including at senior management levels.

### 7.1. Key Lessons and Recommendations in the Organization of VLAP Implementation

#### *Lessons Learned*

- The successful organization of VLAP implementation depends on the effective combination of three key elements: sustained political commitment, dedicated technical expertise, and effective strategic communication.
- The adoption of a realistic national-level VLAP implementation plan, the establishment of timely monitoring and accountability mechanisms, and the active involvement of political leadership are essential for the fulfilment of the benchmarks. The national implementation plan serves as a key instrument for translating EU requirements into practical, achievable, and measurable tasks that are clearly understood by political leadership, public administration, civil society, and international partners, in contrast to the more general provisions of the VLAP.



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- The mobilization of technical expertise, both domestic and international, depends heavily on mid-level technocrats. In this context, the experiences of Georgia and Moldova highlight the importance of identifying and empowering institutional champions across relevant agencies, equipping them with adequate mandates and resources, and ensuring their sustained commitment to the reform process through various incentives, including benefits and opportunities of professional development. Officials responsible for coordination and reform delivery were, in many cases, relieved of competing duties, with VLAP-related responsibilities becoming their primary full-time assignment. This approach strengthened institutional ownership while also improving coordination, continuity, and overall implementation effectiveness.
- The experience of both countries demonstrates that tailored and comprehensive communication strategies are essential for delivering consistent messaging across all relevant audiences. Strategic communication involves both adequately informing public service personnel engaged in VLAP implementation and raising awareness among the wider population domestically, as well as relevant stakeholders in EU member states. While tailored briefings and training activities are generally sufficient for the first group, thereby reinforcing institutional commitment to reforms, the second requires a more comprehensive and sustained approach. The adoption of a consistent and adaptable strategic communication framework is therefore essential to inform the public about the rules of visa-free travel with the EU and to proactively address potential challenges related to information manipulation.
- The VLAP provides an important opportunity to strengthen donor cooperation and mobilize additional resources for the development of institutional capacities. However, this should be pursued through a coordinated and proactive mechanism that ensures adequate awareness among international partners of both implementation needs and sustainability of achieved results.

### Recommendations

- The Ministry of Internal Affairs of Armenia appears to play a central role and bears broad responsibility for driving the overall VLAP implementation process. In addition, it is responsible for the advancement of its own reform agenda in border management, migration and public security, alongside handling routine operational tasks. As the VLAP implementation progresses, this functional burden is likely to increase, potentially affecting the overall effectiveness of reforms. To mitigate this risk, either strategic-level inter-institutional coordination and external communication should be strengthened through involving other institutions or the Ministry should be adequately resourced to sustain effective VLAP implementation.
- Given the general nature of VLAP provisions, effective implementation requires their transposition into a legally binding, well-structured national action plan with clearly defined objectives, assigned institutional responsibilities, realistic timelines, and measurable indicators to ensure coherent implementation, monitoring, and accountability.
- At this stage of the VLAP implementation, beyond the adoption of the national plan, it is important to mobilize technical resources, identify champions across the public service,



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consolidate them under formal frameworks and identify potential challenges such as language barriers.

- While advancing reforms within the Ministry of Internal Affairs, particular emphasis should be placed on strengthening the role and capacity of the international relations unit as a central coordination hub. Strengthening its mandate and reporting lines enhances internal ownership, accountability, and interdepartmental coordination. This is particularly important in hierarchical institutional settings with a conservative administrative culture, where formal structures are key to ensuring sustained leadership engagement and effective implementation.
- Raising awareness among Ministry of Internal Affairs officials of VLAP requirements, EU standards, and the importance of the process through thematic training, briefings, and related activities is crucial for the successful advancement of internal reforms.
- Government agencies in Armenia, including the Ministry of Internal Affairs, have already established effective donor coordination mechanisms and a donor support matrix, which represent good practice. Building on this foundation, greater emphasis should be placed on strengthening domestic capacity for policy development. As policy planning is a core requirement across most VLAP benchmarks, targeted efforts are needed to address gaps in local expertise and ensure sustainable, internally driven policy processes, reducing long-term donor dependence.
- Armenian government institutions, including the Ministry of Internal Affairs, have formalized cooperation with civil society through public councils, enabling inclusive discussion of policy issues, including VLAP implementation. Sustained and meaningful engagement with civil society actors can enhance transparency, support more balanced policy assessments, and strengthen the credibility of the reform process. Given the EU's strong emphasis on civil society participation in governance, such an approach would also contribute positively to the dialogue with EU institutions.
- Despite increasing risks of information manipulation, the current VLAP implementation framework in Armenia insufficiently incorporates a strategic communication component, representing a tangible vulnerability that should be mitigated through the development and operationalization of a dedicated strategic communication framework. It is highly likely that the Ministry of Internal Affairs, as the key driver of the process, will face significant challenges in addressing this issue alone.
- Digitalization is a core component of VLAP-related reforms, particularly in the areas under the responsibility of the Ministry of Internal Affairs of Armenia. While in Moldova and Georgia digital solutions were largely developed in-house by implementing agencies, in Armenia, ICT capacities are centralized within the Information Systems Agency of Armenia (ISAA). In this context, the early and continuous involvement of ISAA in the planning and implementation of VLAP-related reforms is essential, with a clearly defined role in areas such as database integration and the development of electronic systems.
- Cybersecurity considerations should be systematically integrated into all digitalization efforts, as the experience of Georgia and Moldova indicates increased exposure to cyber threats during similar reform processes.



## 7.2. Key Lessons and Recommendations on the Document Security

### Lessons Learned:

- Document security can only be ensured based on a credible and integrity-driven civil registration system, supported by a digitalized central registry interconnected with relevant government databases. Biometric passports, identity cards, and other secure documents are only as reliable as the underlying breeder documents and population records from which they are derived.
- Digitalization must be understood as a part of complex reform, including measures of data protection, integrity and information security, not merely as technical modernization. Georgian perspective of emphasizing the stress of information security regarding digitalization is noteworthy.
- A unified registry can remain credible only with continuous data-quality management depending on regular data quality checks, implying cleansing, verification of inconsistencies, automated error detection and ongoing internal monitoring, clear separation of functions and responsibilities to reduce the risks of corruption and fraud, as well as the introduction of staff training and the establishment and effective implementation of continuous internal control mechanisms.
- The integrity of the document-security system, along with the legal rules and technical safeguards, also depends on the conduct, accountability and professional culture of the officials who operate it. A formal code of ethics or code of conduct explicitly addresses anti-corruption, anti-discrimination and the handling of personal data. Anti-corruption and integrity training is most effective when it is regular, mandatory and practice-oriented.
- Data protection is treated as both a legal and an operational discipline. High standards cannot be ensured by legislation alone. Effective protection depends equally on internal policies, designated data protection officers, access-control rules, backup systems, logging, data-loss prevention tools, and repeated staff training.

### Recommendations:

- The Ministry of Internal Affairs of Armenia operates a population registry. However, it does not cover the full spectrum of civil status records. In this regard, the experience of Georgia and Moldova in establishing unified population registries integrated with multiple government databases provides a useful reference model for the design of further reforms.
- Armenia already uses the Public Service Number as a unique identifier. Further consideration could be given to approaches applied in Moldova, where universal identification systems cover both citizens and foreign nationals and are supported by algorithm-based identity management solutions. Such practices are particularly relevant for addressing cases of multiple nationalities and strengthening the integrity and reliability of identity management systems.
- The identity management reform is most effective when implemented as a comprehensive process synchronizing integrity safeguards, personal data protection, and information



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security measures. As Armenia continues to develop its identity management system, this integrated model may serve as a useful reference for ensuring the coherence and sustainability of reforms. In Georgia, this approach was implemented through the adoption of a set of laws, by-laws, detailed internal regulations and standard operating procedures, as well as extensive training of both senior and operational staff, which was positively assessed by EU experts.

- The practices of Georgia and Moldova in maintaining proactive consultations and regular reporting with relevant EU institutions and Member States, complementing formal communication channels led by the Ministry of Foreign Affairs, provide a practical example of how to facilitate implementation and alignment with EU standards.
- The Georgian practice of issuing status-neutral travel documents to residents of the occupied territories of Abkhazia and Tskhinvali Region who do not accept Georgian citizenship, but require international mobility, may serve as a useful reference point for addressing specific challenges related to temporarily displaced persons who may be reluctant to use Armenian official documents.

### 7.3. Key Lessons and Recommendations on the Migration Management and Asylum

#### *Lessons Learned:*

- The WoGA demonstrated effectiveness as a core principle of governance in the migration domain. However, it is most effective when embedded in a clear institutional framework, with participating agencies exercising genuine decision-making authority and ownership rather than formal participation. Its functionality also depends on a capable coordinating structure, such as a dedicated secretariat, ensuring day-to-day coordination, continuity, and operational effectiveness.
- Concentration of major migration enforcement powers and service delivery within a single specialized agency can enhance the operationalization of national policy and improve the effectiveness of migration management. However, this model requires strong integrity and accountability mechanisms to ensure transparency, prevent abuse, and safeguard compliance with the legal framework.
- Effective policy planning requires realistic strategies and short-term action plans based on the M&D principle and grounded in a coordinated CMM. Strengthening national capacity for the full policy cycle (planning, oversight, analysis, and adjustment) is essential to ensure that policy documents make a real regulatory impact.
- Ensuring the quality of data and the interoperability of databases are important elements for developing analytical capabilities and evidence-based policymaking. However, mobilization and training of human resources are also crucial components for the introduction of the full analytical cycle and successful production of analytical pieces (e.g. MPs).
- Effective fight against irregular migration is anchored in the centralization of administrative procedures within a specialized agency and the shortening of decision-making and enforcement timeframes.



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- The existence of an effective asylum system requires not only streamlined administrative procedures guaranteeing human rights protection, but also appropriate infrastructure and integration programs. The formation of such a system is a time-consuming and resource-intensive process and needs to be carefully designed without overlooking state funds.
- The accelerated procedures with a simplified decision-making process in the asylum proved to be an effective remedy against the manipulative practices of asylum seekers.
- AVR represents a key VLAP-induced innovation in migration management and an important soft tool in combating irregular migration.

### **Recommendations:**

- In Armenia, core migration management functions are already largely concentrated under the Migration and Citizenship Service (MCS) of the Armenian Ministry of Internal Affairs. However, the absence of a clearly defined strategic-level coordination framework limits policy planning and interagency alignment. A migration management model that combines centralized operational capacity with structured strategic coordination may be particularly relevant for Armenia. In this model, most operational functions and services are consolidated within a single specialized agency, while strategic direction is ensured through horizontal WoGA coordination mechanism led by a designated authority. It is therefore relevant to establish a WoGA-based coordination mechanism, potentially under the leading role of the Ministry of Internal Affairs, to strengthen strategic governance and ensure effective implementation of migration policies. At the same time, the consolidation of enforcement powers within a single agency should be complemented by strong integrity safeguards, accountability mechanisms, and effective oversight to prevent maladministration and ensure compliance with the rule of law.
- The WoGA is particularly important for migration data analysis. The development of Migration Profiles requires integration of data, expertise, and perspectives from multiple institutions and provides a basis for interoperable and automated information systems. In this context, it is recommended that WoGA-based coordination mechanisms, once established, be extended to the migration data analysis cycle for supporting evidence-based policymaking and the development of integrated data systems.
- In Armenia, expulsion and asylum procedures need to be revised and modified based on the models discussed in Chapter 6. The migration management procedures should be streamlined and simplified to address the dynamics of migration processes, handle manipulative applications and other potential challenges. Instruments such as accelerated asylum procedure and the AVR approach are considered the best practices under VLAP-related migration reforms and may serve as useful reference points for Armenian authorities in their policy development and reform planning.



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