# RESTRICTIONS FOR RUSSIANS AND BELARUSSIANS

The below provides a general summary of some restrictions for Russian and Belarussian nationals in EU countries as of March 2025, for historical reference. Consult your Fragomen professional for case-by-case current advice.

## • Albania - Update May 30, 2025

 In April 2025, Albania fully suspended its visa waiver arrangement with Belarus, which dates back to 2019. This follows a May 2024 Albanian suspension of visa waivers for Belarussian diplomatic passports.

# • Belgium - Update March 19, 2025

- Short-stay visas. With limited exceptions, short-term Schengen Visa applications filed in Russia are not being accepted. As a limited new exception, it is now possible to obtain a short-term visa for family reasons provided that the family member resides in Belgium.
- Long-stay visas applications can be filed in Russia <u>via VFS</u>, the Belgian embassy's visa service provider.
- Other consular posts. For Schengen visa applications filed in Armenia, Belarus, Kazakhstan, Kyrgyzstan, Tajikistan and Uzbekistan, Belgium is represented by other EU Member State consular posts. Applicants who consider applying to these consular posts are advised to check with the relevant consular post before visiting.

#### Bulgaria.

- o **Update June 14, 2023:** The Short-term (type C) visa issuance suspension for Russian citizens has been lifted.
- Update September 20, 2022: Short-term (type C) visa issuance has been suspended for Russian citizens. It is not clear when this suspension will be lifted.

# • Czech Republic.

- Entry restrictions. Since October 25, 2022, Russian nationals have been denied entry for tourism, sport and cultural purposes, regardless of whether they hold a valid Schengen visa.
- Visas and residence permits.
  - Applicants outside the Czech Republic. With limited exceptions, Czech
    authorities are not issuing any type of visa or residence permit to Belarusian and
    Russian nationals located outside the Czech Republic. This suspension also
    applies to Belarusian or Russian nationals who have dual nationality with
    another country. Some exceptions apply, including for family members of

- individuals with legal immigration status in the Czech Republic (though details vary depending on the nature of the visa or permit in question).
- Applicants located in the Czech Republic. Belarusian and Russian nationals already residing in the Czech Republic may apply for visa renewals, residence permits, or other permitted categories.
- Timeframe for extension. There is no official confirmation regarding an extension of these restrictions into 2026. However, the restrictions remain in place as per the Czech government's current order.
- o **Citizenship.** Effective January 1, 2025, Russian citizens have been able to apply for Czech nationality, provided that can prove they have renounced their Russian citizenship.
- o Documentation.
  - Effective September 15, 2024, and with certain exceptions, the Czech Republic ceased recognizing non-biometric Russian passports. Russian nationals currently in the Czech Republic with a valid residence permit (e.g. long-term or permanent residence) must ensure they have obtained a biometric Russian passport by March 31, 2025, or they will be fined (this deadline was extended from the earlier date of September 15, 2024).
  - From September 15, 2024, all visa applications submitted with non-biometric Russian passports will be rejected; visa applications pending as of that date will also be rejected if applicants do not provide a biometric passport within a 'reasonable period of time' from that date. The new biometric passport requirements will not apply to Russian nationals who are under the age 15, those included in the <u>Civil Society Program</u>, as well as certain <u>visa and residency</u> holders.

## Denmark.

- Visa and residence applications. <u>Since September 10, 2022</u>, Russia has been listed as a <u>category 5</u> country for Schengen visa (previously, it was category 3). Category 5 countries are subject to a more restrictive visa issuance policy. This includes the following restrictions:
  - **Tourism.** Short-term visa issuance for tourist visits is suspended.
  - **Business.** Russian citizens applying for a Schengen visa for a business visit need to provide a specific justification for their trip. Previously, an itinerary and explanation of the business relationship to the host sufficed.
  - **Private visits.** Private visits are only allowed in instances of death or terminal illness of a Danish resident family member. Previously, family visits were allowed.
- Visa facilitation agreement. Denmark has <u>suspended</u> its bilateral visa facilitation agreement with Russia (Denmark not part of the European Union's visa facilitation agreement with Russia, which is also suspended).
- o **Consular posts.** The Danish Embassy in Moscow is closed for all types of visa and residence permit applications. This includes submitting biometrics for residence permit

- applications. Affected applicants will need to apply for Danish visas at other Danish consular posts until the Embassy reopens.
- Visa service provider. Denmark's visa service provider in Russia has suspended the submission of biometric data and issuance of entry visas. Although work permit applications can still be submitted on behalf of Russian citizens, government processing will remain on hold until biometric data is submitted. Schengen visa holders can still submit biometrics in Denmark; Russian citizens with long-term residence in another country can submit their biometric data in their country of residence; other travelers do not have an alternative option to submit biometrics.
- Expedited asylum application list. As of January 19, 2023, Russia has been removed from the expedited asylum application list (ÅGH list), meaning applications by Russian nationals for Danish asylum will not be given priority over other immigration applications. However, exceptions may be made on a case-by-case basis.

#### • Estonia.

- Entry restrictions. Since September 19, 2022, Estonia has prohibited Russian nationals from entering the country via an external Schengen border (i.e. its borders with non-Schengen Area countries) with a Schengen Visa (both short- or long-term variants), irrespective of the visa issuing country. Exceptions are made for:
  - Visiting close family members (spouse, direct descendants, or ascendants) who are Estonian citizens or long-term residents.
  - Diplomatic or consular staff and their immediate family members.
  - Individuals directly involved in international transportation of goods and passengers.
  - EU citizens' family members exercising free movement rights.
  - Entries deemed necessary for humanitarian reasons, such as attending funerals.

Similar restrictions and exceptions apply for Belarusian nationals.

- Transit. Regardless of any restriction, Belarusian and Russian nationals can still transit through Estonia if they are traveling to another Schengen country as long as they meet the specific exemption criteria for transit.
- Work and business visas and residence permits. As of April 2022, Estonia ceased issuing new visas and residence permits to Belarusian and Russian nationals for work or business purposes. Limited exemptions apply as follows:
  - Belarusian nationals who have a legal basis for staying in Estonia may apply for an initial temporary residence permit for working in an information and communication technology-related position.
  - Belarusian and Russian nationals who are applying for an extension of a temporary residence permit for employment or business purposes, or who already hold such residence permit and are changing employers.
  - Belarusian and Russian nationals who have a valid Estonian-issued visa and are applying for short-term registration for employment in Estonia.

- Study visas and residence permits. From July 2022, restrictions were imposed on Russian citizens applying for visas or residence permits to study in Estonia. However, exceptions are made for Belarusian and Russian students, doctors, dentists, and academic staff already in Estonia before Russia commenced the conflict in Ukraine, provided they meet certain criteria, such as proficiency in the Estonian language.
- Digital Nomad Visas. Estonia is not issuing digital nomad visas for Belarusian or Russian nationals.

#### Finland.

- Entry restrictions:
  - **Tourism.** Effective September 29, 2022, Russian nationals with a short-term Schengen visa (Type C) are not permitted to enter Finland for tourism or other recreational travel purposes.
  - **Business travel.** Effective July 10, 2023, Russian business travelers must provide a valid and necessary reason to conduct in-person business activities in Finland.
  - Exceptions:
    - Other permits. Entry remains permitted to Russian nationals holding residence permits issued by Finland, European Union (EU) Member States, European Economic Area (EEA) Member States, or Switzerland; and to Russian citizens holding a long-term D visa issued by a Schengen Area country.
    - Special groups. Various categories of Russian nationals do not face entry restrictions, including, among others: family members of Finnish citizens and foreign nationals with permanent residency in Finland; family members of citizens from EU or EEA Member States or Switzerland; work visa holders; transport and logistics personnel; students; and those arriving in Finland for medical treatment.
- o **Transit.** Transit through Finland is not allowed for many types of Russian travelers. Affected individuals should contact their immigration professional.
- Visa appointments. Effective September 1, 2022, Finnish consular posts in Russia reduced available tourist visa filing appointments to 100 (down from 200), and other visa filing appointments (work, studies or family purposes) to 400 (down from 800). This measure also affects biometric submission for all schemes.
- Permit appointments. Biometrics appointments and any other residence permit
  matters are currently only available at the Finnish Embassy or VFS Global in Moscow. The
  other VFS service points in Russia are only processing visa applications.
- Consular posts. Following the closure of Finland's consular post in St. Petersburg in October 2023, Finland's consular post in Moscow began accepting all Finnish visa and residence permit applications in Russia.
- o **Timeframe for restriction extensions.** Effective July 10, 2023, the Finnish Ministry of Foreign Affairs announced that existing travel restrictions for Russian citizens traveling to or through Finland are extended 'until further notice'.

• **France**. Due to France's suspension of its visa facilitation agreement with Russia, Russian citizens applying for a short-stay French visa will now have to pay EUR 80 instead of EUR 35 and their short-stay visa applications will take 45 days to process (instead of the usual 15 days).

### • Ireland.

Visa restrictions. Russian and Belarusian nationals intending to travel for most purposes or length of stay need a visa for entry to Ireland, even if they hold a visa from a Schengen Area country or the United Kingdom. Previously, these nationals were eligible for the Short Stay Visa Waiver, which allows certain nationalities who have a UK short stay visa to travel to Ireland for a limited period without an Irish visa. This primarily impacts visitors and business travelers, as the scheme only applies to short stays.

# • Latvia - Update March 20, 2025

- Visa applications. With limited exceptions, Latvia does not accept short-term (C type) or long-term Schengen Visa (D type) applications from Russian nationals, or short-term Schengen Visa (C type) applications from Belarusian nationals. Limited exceptions include:
  - Family members of Latvian nationals;
  - Family members of nationals of the European Union; European Economic Area states, or the Switzerland;
  - For Belarusian nationals only, family members of Belarusian nationals who hold valid residence rights in Latvia;
  - If entry is related to humanitarian reasons;
  - Limited diplomacy-related circumstances;
  - For Russian nationals only, if residence rights in Latvia have been granted and a Russian national requires a visa for entry into Latvia; and
  - For Belarusian nationals only, employees of transport and passenger service providers, crew members of cargo or technical voyages arriving in Latvia to perform their duties, and seafarers who need to reach their workplace on a ship or return from it.
    - Latvian authorities continue to accept applications for a longterm Schengen Visa (D type) visa from Belarusian nationals.
- Restriction extension. Current restrictions on entry to Latvia via EU external borders for Russian nationals have been extended until March 4, 2025, and unofficially are expected to continue beyond this date. Individuals who were previously exempt from the ban will remain exempt.
- Entry restrictions. With limited exceptions, Russia nationals are not allowed to enter Latvia at any of the country's external Schengen borders (i.e. its borders with non-Schengen Area countries). Exemptions include Russian nationals who are:

- Holders of a residence permit in Latvia, the European Union, European Economic Area states, or Switzerland;
- Holders of a long-term visa issued by a Schengen Area member state;
- If granted Schengen visa, and are:
  - Family members of Latvian nationals (spouses, minor children of spouses, parents, grandparents, children, grandchildren, as well as persons under guardianship, custody, or foster care);
  - Family members of nationals of the European Union, European Economic Area states, or Switzerland;
  - Employees of transport and passenger service providers, crew members of cargo or technical voyages, who arrive in or depart from Latvia to perform their duties;
  - Seafarers who need to reach their workplace on the ship or who need to return from it;
- If entry is related to humanitarian reasons;
- Limited diplomacy-related circumstances.
- o Belarusian nationals are not subject to any Latvian entry restrictions.
- Permit applications.
  - Temporary residence. Issuance of initial and renewal temporary residence permits to Russian nationals is <u>suspended</u>. Limited exceptions include: family reunification, international protection, employment under EU directives, continued employment, scientific research, studies and internships under EU directives, national interest, and humanitarian considerations.
  - **Residence-by-investment.** Russian and Belarusian citizens are not eligible for a residence permit based on investment or the purchase of real estate in Latvia.
  - Slower government processing times. Extensive background checks and additional document requirements for Belarussian and Russian citizens permitted to file residence permit applications under an exemption from the general restriction are causing overall immigration processing times of up to one year from the date of filing, as opposed to normal processing times of up to one month for other visa-required nationals.
- Entry interviews. Latvian border guards currently conduct an interview with each Belarussian and Russian national seeking entry to Latvia. Russian citizens could be asked to sign a document confirming their stance on the war in Ukraine before being permitted entry.
- Lithuania Update May 14, 2025

- Entry restrictions. Belarusian and Russian nationals are not subject to entry restrictions, but may face increased scrutiny by border officials (a so-called 'individual supplementary detailed examination').
- Suspension of visa issuance. Lithuanian consular posts are not issuing Schengen and national visas to Russian and Belarusian citizens. No exceptions apply regarding national visas. Exceptions apply for Schengen visa applications for the following individuals:
  - those with Lithuanian origin and their close family;
  - those seeking to reinstate Lithuanian citizenship and their close family;
  - family members of a Lithuanian/EU/European Economic Area/Swiss citizen; and
  - those whose visa is sponsored by the Ministry of Foreign Affairs.
- Residence permit applications. The government has suspended the acceptance of temporary residence permit applications for Russian nationals, except for those with a valid Schengen visa, national visa or residence permit issued by Lithuania, or a residence permit issued by another EU Member State. However, Russian nationals currently resident in Lithuania can still extend their stay in country.
- Grounds for revocation. Effective May 3, 2025, Lithuanian temporary residence permits issued to Russian nationals may be <u>revoked</u> if the permit holder travels to Belarus or Russia more than once in a three-calendar month period. Limited exceptions include:
  - members of crews working for companies engaged in international freight and passenger transport, or carrying out international freight and passenger transport to or from an EU Member States or in transit through Lithuania;
  - the travel to Belarus or Russia was for reasons beyond the control of the permit holder.

Nationals of Belarus are not subject to the above regulation.

#### Netherlands – Update March 11, 2025

Visa applications. Russian nationals can only apply for a short-term Schengen Visa in <a href="limited circumstances">limited circumstances</a>, including visiting close family or business visits. Depending on the purpose, applicants must either apply at VFS Global or the Dutch consular post in Moscow. This consular post has restarted issuing short-term visas after a temporary pause in the issuing of such visas to Russian nationals.

## Norway.

- Visas restrictions. Norway has ceased granting visitor visas to Russian nationals travelling to Norway for tourist purposes, other non-essential purposes, or to visit family members other than parents, spouse, cohabitant or children. Exceptions apply, including (among others): visiting close family, transit, work or study, or being the family member of a national of an EU Member State, or Iceland, Liechtenstein or Norway.
- Visa facilitation. The visa facilitation agreement with Russia has been suspended. As a result, visa applications cost more and take longer to process. Multiple-entry visas are also suspended for Russian citizens.

### Poland.

- Entry restrictions.
  - Russian nationals cannot cross external EU borders in Poland (by any method) unless they belong to one of the groups exempt from new restrictions, including workers (as long as work permit and confirmation of work in Poland is provided) and holders of a Poland Business Harbour visa (note that in April 2023, the Polish government eliminated the exceptions for children enrolled in Polish schools or their guardians; students of Polish universities; and dependents with Russian passports entering on a visa, unless the individual holds a Polish Residence Permit or "Polish Business Harbor" visa). These restrictions do not apply to those entering Poland from another Schengen country.
  - Under a common regional approach, Estonia, Latvia, Lithuania and Poland restrict entry to Russian citizens holding Schengen visas. Each country will implement the agreement into national policy on its own terms and potentially with their own exceptions.
- Heightened scrutiny. Russian citizens face an increased number of rejections for residence permit renewal applications as a result of negative security agency (ABW) opinions issued following the standard background check that is undertaken for all foreign applicants. Decisions indicate the need to protect state security as a reason for the rejections. Additionally, Fragomen anticipates that Russian citizens holding valid long-term status, e.g., a residence card issued by Poland, may also face heightened scrutiny and obstacles during border crossing. Employers are advised to assess and minimize travel requirements to prevent issues for Russian citizen staff based in Poland. Fragomen also recommends affected employers to review the immigration status of their Russian employees in Poland, to ensure there is a business continuity plan for in-country immigration steps in case of rejections, and to re-assess potential migration plans if appropriate, to ensure timely action.
- Visa issuance. Standard national visa (work visa and entry visa) issuance is still suspended for Russian citizens. Additionally, issuance for initial-Schengen visas, and Poland Harbour visas is also suspended for Russian citizens. Other visa category applications are subject to strict scrutiny for Russian citizens.
- Special permission applications. As of October 28, 2022, Russian citizens can no longer file new Special Permission applications, as Russia was removed from the list of countries whose nationals can perform work in Poland based on Special Permission. Russian citizens already working under this permission type in Poland can remain until the end of their permission document if they also have a legal right of stay in Poland. Pending Special Permission applications as of this date will be processed.
- Romania Update April 26, 2024
  - O Visas:

- **Consular posts outside Russia.** Romanian consular posts outside Russia are not issuing Romanian visas to Russian nationals.
- Consular posts inside Russia. Romanian consular posts in Russia, however, are issuing short-stay visas (for tourism and business travel purposes) to Russian citizens on a discretionary basis applicants have no guarantee of approval. These consular posts had previously ceased issuing such visas to Russian citizens.

## Slovakia - Update March 12, 2025

- o **Increased scrutiny**. Russian nationals applying for Schengen visas should expect stricter review and additional document requirements, with the degree of scrutiny varying depending on the consular post processing the application.
- o **Invitation requirement.** Russian nationals applying for Schengen Visas may be required to obtain a verified invitation in addition to the regular documents submitted with their visa application. A verified invitation includes an invitation letter from a physical or legal person residing in Slovakia confirming that this individual or entity can cover the Russian national's stay in Slovakia, a bank statement from this individual or entity and confirmation of accommodation.

## Spain

- Golden visas. As of March 15, 2022, Russian nationals have not been eligible for Spanish golden visas. In any event, Spain's Golden Visa program is <u>terminating in April</u> 2025.
- o **Other visa and permit types.** Spain has not implemented other visa or permit restrictions or suspensions.
- o **Transit visas.** Russian nationals will require a transit visa to enter any international travel area in Spanish airports, starting July 12, 2025. Exceptions to this rule will include Russian nationals who hold a valid Schengen visa, residence permit issued by any of the EU/European Economic Area member states and diplomatic passport holders.

# • Sweden - Update March 10, 2025

- o **Entry restrictions.** Sweden has not implemented any restrictions or suspensions.
- Increased scrutiny. Immigration applications from Russian nationals are subject to increased scrutiny by Swedish authorities, including regularly being sent for further review by the Swedish Security Service. This has increased the government processing times for such applications well beyond the standard 30 days, with country experts observing applications taking several months or even more than a year to be processed.
- Delays for residence cards. Swedish residence card applicants awaiting receipt of their cards at the Swedish Embassy in Moscow should expect delays as several courier companies recently stopped making deliveries to Russia. During non-holiday periods,

residence cards – which must be processed in Sweden and then couriered to the relevant embassy – can currently take up to six weeks (and potentially longer) to arrive after being sent from Sweden. The previous timeframe for such delivery was around four weeks. Residence cards cannot be forwarded to another Swedish embassy or an address in Sweden. At best, the Swedish embassy in Moscow can only send the card back to the Migration Agency in Sweden – however, such deliveries are currently delayed for the same logistical reasons.

# Switzerland - Update August 18, 2023

- Reduced visa facilitation. Due to Switzerland's <u>suspension</u> of its bilateral visa facilitation agreement with Russia, Russian citizens applying for a short-stay Schengen visa must pay EUR 80 instead of EUR 35 and their short-stay visa applications take 45 days to process (instead of the usual 15 days).
- Visa application restrictions. As of August 16, 2023, individuals holding ordinary and diplomatic passports, residence permits for stateless persons, return certificates, and seafarer's identity cards issued after the following dates from regions of Ukraine (Crimea and Sevastopol after March 18, 2014; Donetsk after April 24, 2019; Kharkiv after August 1, 2022; Kherson after May 25, 2022; Luhansk after April 24, 2019; and Zaporizhzhia after May 25, 2022) or from Abkhazia and South Ossetia after August 26, 2008 are no longer able to obtain Schengen visas in Switzerland or cross Schengen external borders via Switzerland. However, individuals from the above-listed areas can still obtain visas for humanitarian reasons, among other limited reasons.
- **Türkiye**. As of January 2023, the Migration Directorate will no longer give Russian nationals preferential treatment when they apply for tourist residence permits, which had resulted in a higher number of permits than usual being granted. As a result, Russian nationals should now anticipate a higher rate of denials for these permits.

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