



**UNHCR**  
The UN Refugee Agency



# MONITORING REPORT

ON CROSSING EECIP'S  
AND IBCP'S

January-June 2021



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This report provides the results of observation at all seven Entry-Exit Checkpoints (EECPs) and the survey conducted at two of them (Novotroitske EECP in Donetsk Oblast and Stanytsia Luhanska EECP in Luhanska Oblast) in the first half of 2021. Additionally, the report also contains some preliminary observations at International-Border Checkpoints (IBCPs) from April to June of 2021. The survey is a part of the monitoring of violations of rights of the conflict-affected population including internally displaced persons (IDPs) within the framework of the project "Advocacy, Protection and Legal Assistance to the Internally Displaced

Population of Ukraine" implemented by Charitable Foundation (CF) "Right to Protection" (R2P) in partnership with and with the financial support of the United Nations High Commissioner for Refugees (UNHCR)<sup>1</sup>. The objective of the survey is to explore the motivations and concerns of the civilians travelling between the non-government-controlled areas (NGCA) and the government-controlled areas (GCA), as well as the conditions and risks associated with crossing the contact line through EECPs during the quarantine period. More statistical data are available on the 2021 Eastern Ukraine Checkpoint Monitoring Online Dashboard<sup>2</sup>.

<sup>1</sup> The survey has been conducted since June 2017.

<sup>2</sup> <https://www.unhcr.org/ua/en/eecp-monitoring-2021>.

## METHODOLOGY

This report is based on a survey of civilians crossing the contact line and observations from January to June 2021 at EECs, as well as observations at IBCPs from April to June 2021. This survey was conducted anonymously and with the informed consent of the respondents. All persons interviewed for the survey were made aware of its objective. The survey was conducted in the form of personal interviews with people aged 18 and above. R2P monitors surveyed pedestrians queuing at the EECs waiting to cross the contact line. The survey was not conducted in the vehicle queue and on weekends. R2P monitors approached every fourth person in the line with a request to complete the survey. If a person refused to participate, R2P monitors proceeded to survey the next fourth person in the line. People travelling both to and from the Government Controlled Area (GCA) took part in the survey. At no time did R2P monitors cross the “zero” checkpoints into the NGCA (Non-Government

Controlled Area). However, quarantine restrictions significantly affected the number of respondents. The overall share of respondents travelling in both directions was almost the same: 53 per cent of interviews were conducted with people heading to NGCA, and 47 per cent of respondents were going to GCA.

The survey results should not be directly extrapolated to the entire population travelling through the EECs, but can help to identify the needs, gaps, and trends, while providing an evidentiary basis for the advocacy efforts. Observations were carried out every week throughout the first half of the year during visits to each of the EECs and IBCPs. Besides surveying and making observations, R2P monitors also consulted people about their concerns, assisted with documentation, and helped to set the phone applications for self-isolation. This protection assistance was a valuable source of information for the EEC monitoring.



## INTRODUCTION

After suffering the results of seven years of conflict in the East of Ukraine, people have faced the consequences of COVID-19, which has deepened the social and economic crisis affecting people, particularly the NGCA residents. With the closure of EECPs from 22 March of 2020, people were blocked from accessing

their permanent residence, and thus visiting and caring for family members, collecting social benefits or pensions to which they are entitled.

The COVID-19 prevention measures introduced in 2020 continued to make crossing more difficult.





After the closure of the contact line on March 2020, it was reopened on November 2020 on the GCA side. However, restrictions on the NGCA side contributed to a sharp reduction in crossings compared with pre-pandemic levels. Despite the operation of two working EECs Novotroitske in Donetsk Oblast and Stanytsia Luhanska in Luhanska Oblast, the number of crossings in the first half of 2021 was 274,000 crossings which is just 4 per cent of that of the first half of 2019 and 10 per cent of that of the first half of 2020. Meanwhile, the number of Ukrainian citizens crossing through IBCPs continues to grow<sup>3</sup>.

Due to the restrictions on crossing the contact line, many NGCA residents decided to go to GCA through the Russian Federation and cross the Russian-Ukrainian IBCPs in Milove or Hoptivka. This trip necessarily took much longer than crossing the contact line, and incurred additional expenses for transportation, and, in many cases, the payment of a fine for illegally crossing the border.

<sup>3</sup> According to official statistics from the State Border Guard Service of Ukraine.

## HIGHLIGHTS

- The flow of crossing people continued to decline in 2021. According to the State Border Guard Service (SBGS) statistics<sup>4</sup>, there were 6,589,000 crossings in the first half of 2019 and 2,656,000 crossings in the corresponding period of 2020, while only 274,000 crossings have taken place in the first half of 2021.
- In the first half of 2019 and 2020 receiving state benefits and other cash-related issues were the most commonly cited reasons given for NGCA residents to cross the contact line, whereas in 2021 visiting relatives was their most common reason listed. Before the introduction of quarantine restrictions, long lines were a major concern at all EECPs. When crossings were allowed through two EECPs, possible issues with permits were most commonly cited by respondents in 2021 as reasons for their concern.
- In the first half of 2021, UNHCR supported services facilitating the crossing of the EECPs. For example, at least 6,500 people were provided with help from R2P monitors with installing and running the mobile phone application Vdoma, and about 1,200 people were assisted by R2P in getting permissions for crossing from the Coordination Group<sup>5</sup>. Also, 29,918 vulnerable elderly persons were provided with transport support at Stanytsia Luhanska EECP by NGO Proliska's electric vehicle.
- In line with R2P advocacy, on 22 March 2021, amendments were made to Resolution #1236 on COVID-19 measures that greatly facilitated the crossing procedure for foreigners. Foreigners who have permanent residence in Ukraine are no longer required to have insurance when crossing the contact line to GCA.
- R2P monitors reported one fatality at zero checkpoint of Stanytsia Luhanska EECP in 2021. The primary cause of death was related to heart problems.
- Crossing the contact line remained possible only through two EECPs: Novotroitske in Donetsk Oblast and Stanytsia Luhanska in Luhanska Oblast (see the table in section 8. Observations at EECPs).
- Reconstruction work at Stanytsia Luhanska EECP began in May. It was planned to upgrade the infrastructure of the EECP in a similar way to what had been undertaken at Novotroitske EECP (Administrative Service Center, sheds, etc.). Travellers have faced inconveniences including the lack of sheds, the sidewalk is in poor condition, relocation of private COVID-19 testing laboratories closer to the roadway and the removal of the benches near them. The repair work was planned to be finished by the end of the summer.

<sup>4</sup> General statistics on crossings are available at the UNHCR dashboard visualizing data from the State Border Guard Service. <https://goo.gl/TZbU8c>

<sup>5</sup> To cross the contact line, people must have an electronic permit issued on the website of the Security Service of Ukraine (SBU). For those persons who for some reason cannot independently issue an electronic permit, people must contact the Coordination Group that will help in obtaining a permit.



- Due to the restrictions on crossing the contact line by de-facto authorities, many NGCA residents decided to go to GCA through the Russian Federation and cross the Russian-Ukrainian International Border Crossing Points in Milove and Hoptivka.
- Crossing and waiting conditions at border points were not entirely satisfactory. The monitoring conducted on the Ukrainian side of IBCPs identified the need for certain services and the lack of infrastructures at both, particularly in Milove (see the table in section 10. Observations at IBCPs).
- According to SBGS and protection monitoring, infringement notices for illegal crossing were issued on a daily basis. SBGS could issue a verbal warning instead of a fine to specific groups of people, such as pensioners, Persons with disabilities, or multi-child families.
- Thus, data transmitted by the SBGS to R2P confirm that the number of Ukrainian residents who were fined for illegal crossing under Article 204-2 of the Code of Administrative Offences<sup>6</sup> showed an increase since the introduction of COVID-19 quarantine restrictions.
- In response to this issue, an amendment to the COVID-19 quarantine legislation was proposed in 2020. The amendment suggested releasing citizens of Ukraine violating the procedure of entering and leaving the NGCA through IBCPs on humanitarian grounds from the administrative responsibility for the period of quarantine, or for the period of blocking of the EECs. The amendment was adopted on 29 June in 2021, and signed by President on 22 July.

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<sup>6</sup> Article 204-2. violation of the procedure for entering and leaving NGCA entails the imposition of a fine from one hundred to three hundred non-taxable minimum incomes of citizens.

# EECP SURVEY

## DEMOGRAPHICS OF RESPONDENTS

For the period from January to June 2021, R2P monitors surveyed 3,533 individuals. The overall statistics of the respondents surveyed in 2021 showed the following: the majority (60 per cent) of respondents were women. Moreover, 56 per cent of all respondents were more than 60 years old. Women over 60 years old constituted 33 per cent of all respondents (1,178 individuals). Five per cent of all respondents were travelling with children. Also, the number of vehicles could be neglected due to the closure of three previously operating EECPS.

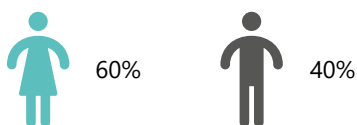
Female respondents outnumbered male respondents over the first six months of 2019, 2020 and 2021, but the proportion of male respondents increased over this period. At the same time,

the age disaggregation showed a tendency for the age category of 60+ to decline, and the age category of 35-59 to increase. The decrease may be caused by the fact that in order to cross the contact line people face a complex procedure of document submission on the NGCA side, including an indication of the reasons for the crossing and supporting documents. Moreover, such a trip entails additional difficulties associated with undergoing PCR tests, possible observation, and installing the Vdoma app on the GCA side.

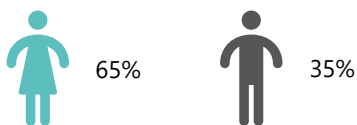
The overall distribution of respondents in 2021 was almost equal in both directions of crossing: 53 per cent of interviews were conducted with people heading to NGCA, 47 per cent – with people going to GCA.

### Gender of respondents

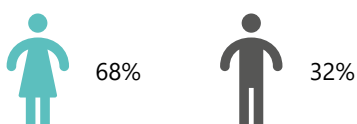
in the first half 2021



in the first half 2020



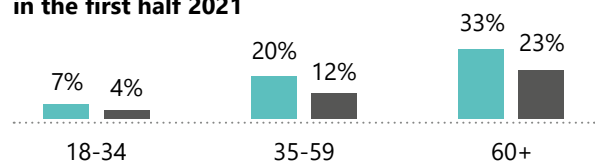
in the first half 2019



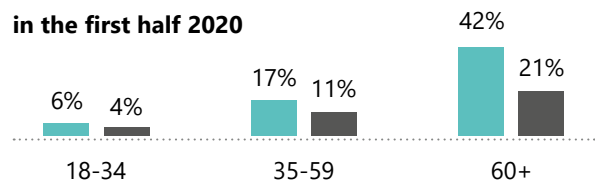
● Female ● Male

### Gender and age of respondents

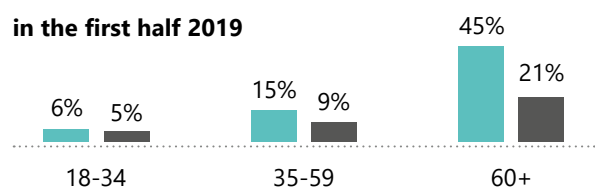
in the first half 2021



in the first half 2020



in the first half 2019



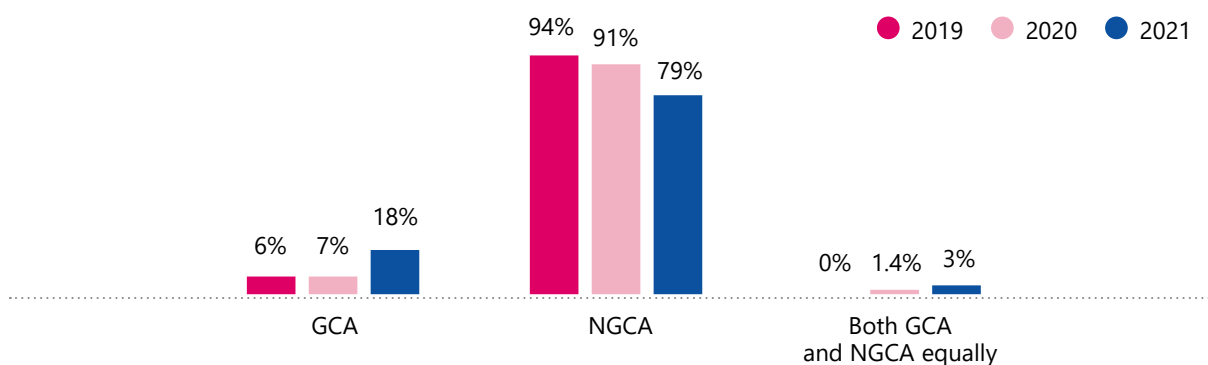
● Female ● Male

## RESIDENCE

The share of respondents residing in the NGCA differed between the half-years of 2019, 2020 and 2021. Share of NGCA residents began to decrease from the beginning of quarantine in 2020. This decrease may be caused by the complicated procedure of crossing, in particular

for people with NGCA residence registration and who reside there. At the same time, GCA residents have fewer reasons to visit the NGCA, while people who reside in the NGCA often said they needed services that are unavailable or limited in the NGCA.

### Current place of residence



## FREQUENCY AND DURATION OF CROSSING

The vast majority of respondents said they used to cross the contact line once every two months. This was especially true of pensioners (90 per cent of older people travelled bimonthly), who need to be within the GCA at least once every 60 days to ensure the payment of their pension.

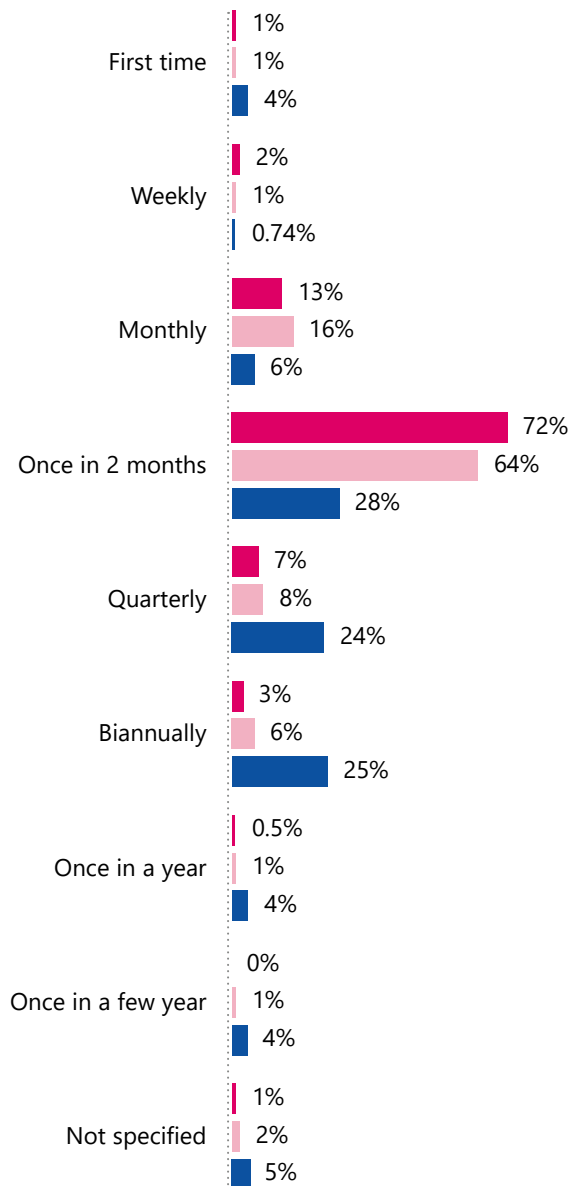
But since March 2020, the number of people crossing declined due to the introduction of the COVID-19 restriction measures. In the first half of 2021, the proportion of respondents who said they travelled bimonthly was only 28 per cent. In turn, more people indicated quarterly and biannual frequencies. Hence, there was a

tendency for the length of time between trips to increase.

The majority of all respondents who traveled bimonthly were in the age category of 60+. In the first half of 2019 and 2020, the proportion of people traveling bimonthly was 90 per cent in both half-years, while, in the first half of 2021, the equivalent proportion fell to 44 per cent. This may be due not only to the closure of EECPs, but also to the fact that respondents aged 60+ used to undergo physical identification procedures<sup>7</sup> every two months. Due to quarantine restrictions, mandatory identification was suspended.

<sup>7</sup> Physical identification means a personal visit to a bank branch with a passport, bank card or electronic pension certificate, contacting the bank's cash desk and performing any action with the account (cash withdrawal, payment for housing and communal services, checking the balance, etc.), which requires the entering of a PIN code.

## Frequency of crossing the contact line



● First half 2019 ● First half 2020  
● First half 2021

The duration of crossing significantly varied depending on the EECP and which side they were coming from. In the first half of 2021, the longest duration of crossing (2–3 hours) was most frequently mentioned (31%) at Olenivka CP (NGCA side), whereas at Stanytsia Luhanska EECP on the NGCA side it mostly took less than half an hour. Meanwhile, on GCA, it usually took no more than two hours to cross EECP.

By comparison, both in 2019 and in 2020 the longest duration of crossing was observed at Stanytsia Luhanska on GCA side 1–2 hours, as well as on NGCA side 2–3 hours. Meanwhile, at Novotroitske EECP, people mentioned the shortest duration – up to one hour.

Moreover, the time required to cross EECPs decreased in general at both operational EECPs in the first half of 2021, compared to the first half of 2020, mostly as a result of the smaller number of people crossing daily. This trend was slightly less significant for the crossing of the GCA EECP, most probably because of COVID-19 preventive measures imposed there (COVID-19 tests, installation of Vdoma app).



## REASONS FOR CROSSING

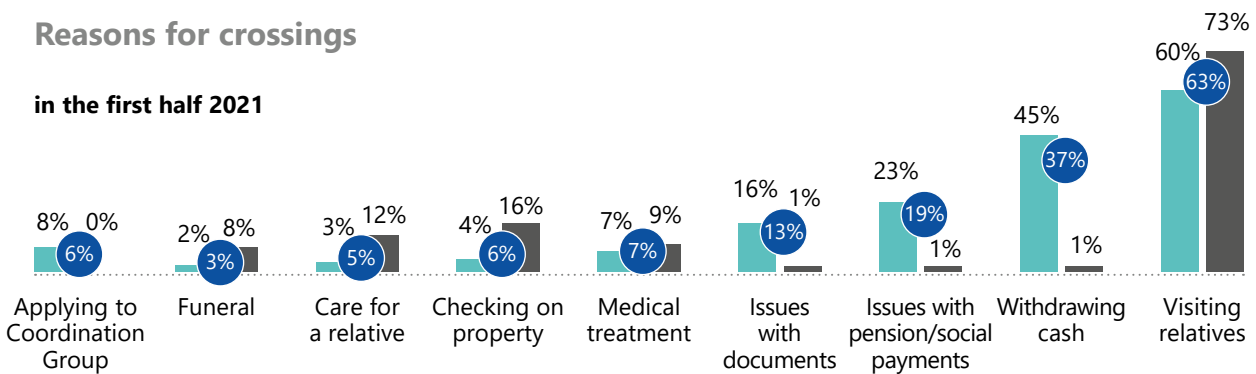
Reasons for crossings indicated by respondents varied throughout reporting periods. However, as in previous years, the reasons differed notably between GCA and NGCA residents.

In the first half of 2019 and 2020, solving issues with pensions or social payments was the most common reason for NGCA residents to cross the line of contact. It was more common

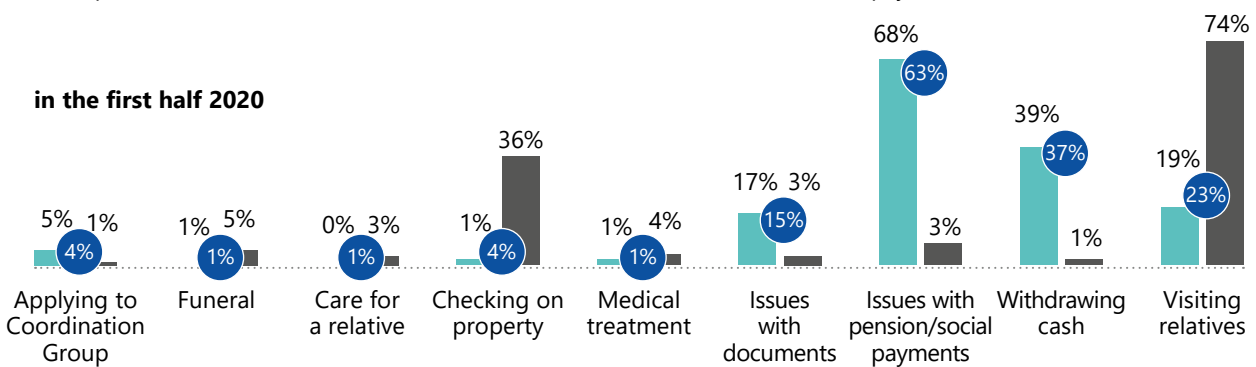
among NGCA elderly residents: 90-92 per cent of respondents aged 60 years and above mentioned this compared to only 21-35 per cent of the respondents aged 34-59. These issues include the motive of avoiding suspension of pensions or social payments due to absence on GCA over 60-days (78-82 per cent of respondents who crossed the contact line mentioned it).

### Reasons for crossings

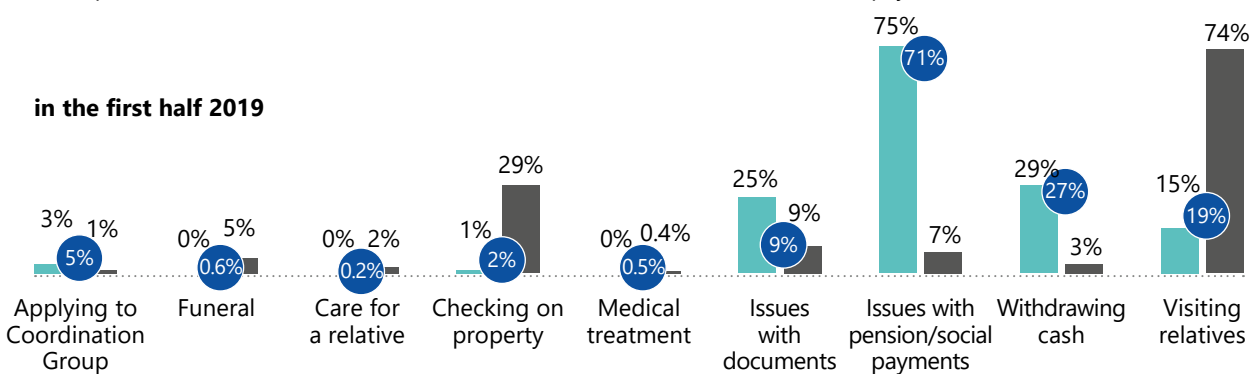
#### in the first half 2021



#### in the first half 2020



#### in the first half 2019



● NGCA ● GCA ● All respondents

Percentages are calculated inside each group (GCA/NGCA). Respondents could indicate several reasons for crossing.

In the first half of 2021, the situation changed significantly. From October 2020, visiting relatives was the most frequently mentioned motive for crossing among other reasons. The increase was most commonly seen across all three age groups and constituted 62-63 per cent of the total. Access for withdrawing cash was another significant reason for NGCA residents to cross to GCA, as before the COVID-19 restrictions. At the same time, a significantly smaller share of the respondents mentioned solving issues with pension and social payments. It collated with suspension of physical identification and automatic prolongation of social benefits. Prior to the COVID-19 restrictions, visiting properties was one of the main reasons for GCA residents to go to NGCA.

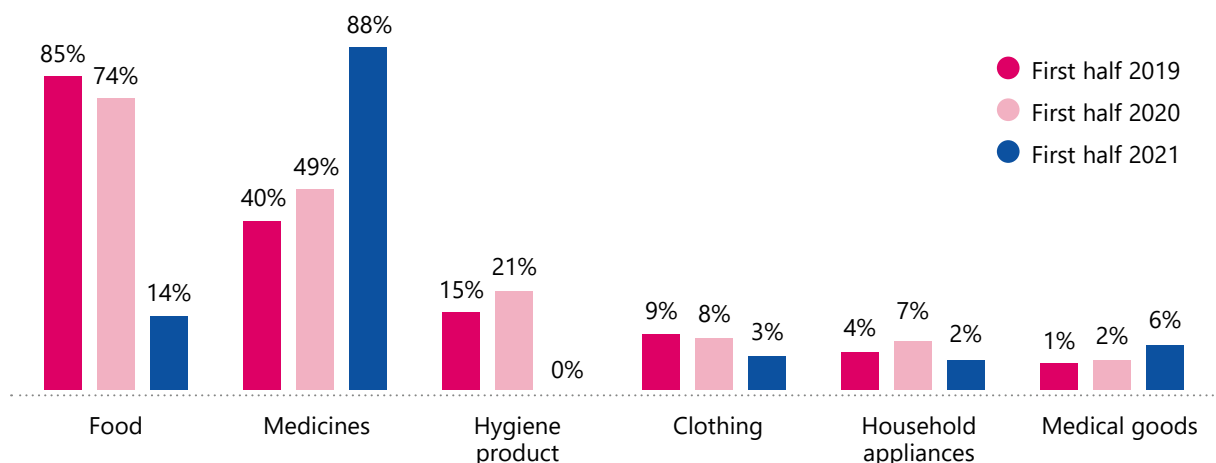
Checking on property was one of the major reasons for GCA residents to cross to NGCA, this trend may continue especially regarding to NGCA legislation on nationalization of abandoned housing adopted by Donetsk de-facto authorities in late April.

The proportion of respondents who travelled to solve issues with documents has not changed significantly since 2019 (fluctuations were within

a range of 4 per cent). But there were variations in types of documents mentioned. In the first half of 2021, almost half of the respondents (44 per cent) who had issues with documents mentioned issues related to ID-Card. It should be noted that only 2 per cent in 2019 noted issues related to international passport. Meanwhile, in the first half of 2020 and 2021, the percentage made up 34 per cent for 2020 and 26 per cent for 2021. In the first half of 2021, among other documents, respondents mentioned obtaining death (14 per cent), birth (5 per cent), and IDP certificates (5 per cent).

In the first half of 2021, 3 per cent of all respondents indicated shopping as one of their reasons for crossing compared to 13 per cent of the respondents in the first half of 2019 and 4 per cent in the first half of 2020. At the same time, comparing the periods, it should be mentioned that, there was a significant difference in the kind of purchases that respondents bought. Share of medicine drastically increased, while food and hygiene items dropped.

## Shopping: what kind of purchases



## DESTINATION OF THE TRIP

As the NGCA residents often travel to solve issues related to state, legal, or bank services, it is important to understand the demand on the infrastructure of the settlements in the GCA. 44 per cent of all surveyed NGCA residents (1,914 individuals) agreed to answer the question about their intended destination point. The majority of these respondents (95 per cent) were visiting settlements in Donetsk and Luhanska Oblast, mostly those located closer to the EECPs; one per cent were heading to Zaporizhzhia

Oblast, 0,9 per cent – to Dnipro Oblast. For some respondents, destination points were the actual EECPs where the respondents intended to obtain the services available there.

The most common destination point for respondents surveyed at Novotroitske EECF who answered this question was Mariupol (64 per cent). Respondents at Stanytsia Luhanska EECF were mostly travelling to Stanytsia Luhanska settlement (43 per cent).

## CONCERNS WHILE CROSSING THE CONTACT LINE

In general, the share of respondents concerned about the crossing decreased from 64 per cent to 25 per cent from 2019 to 2021<sup>8</sup>. In the first half of 2021, the majority of people who said they were concerned when crossing EECFs, mentioned possible issues with permits. Indeed, people faced uncertainty about the crossing procedure due to the lack of information from NGCA side after the introduction of quarantine restrictions. In addition, the passage through the contact line depended on permission from the de-facto authorities given through complicated procedures.

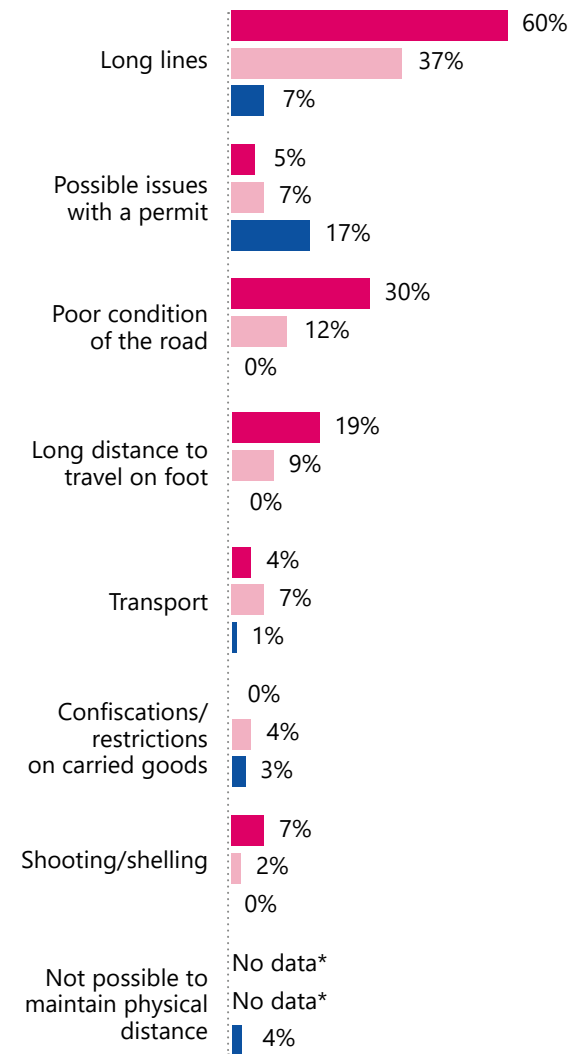
The trends differed between two operating EECFs – Novotroitske and Stanytsia Luhanska. For instance, 38 per cent of respondents noted possible issues with a permit as the reason for their concern at Novotroitske, while only 7 per cent share this particular concern at Stanytsia Luhanska EECF. This reflects a context where conditions for crossings remained

seriously restricted as a result of COVID-19, particularly at Novotroitske EECF, due to the complex procedure of crossing from NGCA (see chapter 9. PROCEDURE OF CROSSING AT EECFs). As, the passage depended on permission from the de-facto authorities, some people were not able to cross the contact line despite having humanitarian reasons for crossing. Thus, given the small number of daily crossings at both EECFs, physical distance and long waiting lines were not among priority concerns.

At the beginning of 2019 and 2020, the situation was somewhat different: long lines were a major concern at all EECFs in the first half of 2019 and 2020. The share of respondents who mentioned this issue as their concern was different at each EECF. This variation was influenced by a multitude of factors such as the number of crossings at the particular EECF, technical issues, numbers of operating staff, etc.

<sup>8</sup> Respondents could indicate several concerns.

### Most frequent concerns while crossing



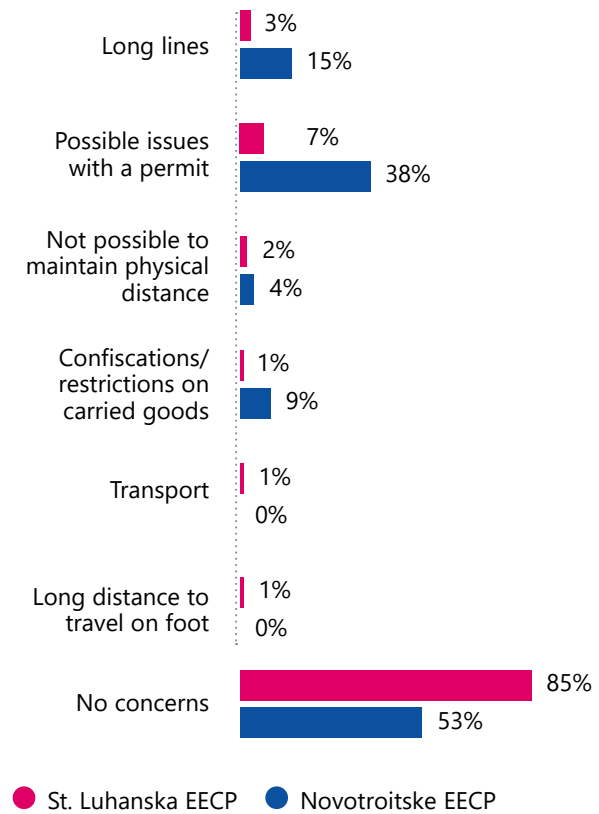
● First half 2019 ● First half 2020  
● First half 2021

\* These data were not collected before 2020

As for the first half of 2021, the concerns expressed about long waiting lines decreased after the introduction of COVID-19 restriction measures due to decrease in the flow of people.

In 2021, a very small percentage of respondents raised concerns about the risks associated with

### Most frequent concerns at EECs in the first half of 2021



Percentages are calculated inside those people who expressed any concerns. Also, respondents could indicate several concerns.

COVID-19. This can be explained by the small numbers of people crossing the EEC every day, and the absence of long waiting lines.

Finally, although respondents did not report concerns about sex- and gender-based violence (SGBV) to R2P monitors, some did express anxieties about abuse of power. There is a risk that people felt uncomfortable about reporting SGBV incidents. But in May and June, the R2P monitors did receive complaints about thorough search of personal belongings (cosmetics bags, underwear, first aid kits, etc.) at Olenivka CP (NGCA side), to the point that some people were forced to undress to their underwear for manual inspection.

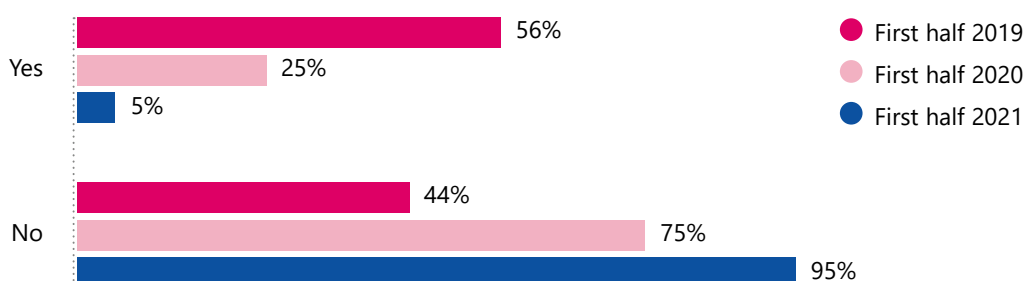


## WAITING CONDITIONS

A comparison of the half-year periods starting from 2019 showed that the share of respondents concerned about the waiting conditions decreased from 56 per cent to 5 per cent in the fourth quarter of 2020.

This may be because during the COVID-19 restriction measures, the complex and restrictive procedure for crossing led to a decrease in the number of crossings.

### Issues with waiting conditions



In the first half of 2021, among operational EECPs, the conditions at Stanytsia Luhanska were of less concern to the respondents interviewed there. In contrast, a higher share of respondents was at Novotroitske EECP, 6 per cent of respondents complained about the lack of seats, due to the long waiting time in the module.

Even though Stanytsia Luhanska EECP was of less concern to respondents (4 per cent), in May the number of concerns expressed began to increase due to the reconstruction at EECP.

It was planned to update the infrastructure of the EECP on the model of Novotroitske EECP (Administrative Service Center, sheds, etc.). In this regard, people faced inconveniences: there were no sheds and the sidewalk was in disrepair, private COVID testing laboratories were moved closer to the roadway and the benches near them were removed. The repair work was planned to end by the end of summer 2021.

Regarding awareness of respondents at EECPs, in 2021, 99 per cent of respondents did not feel they lacked any information.

## OBSERVATIONS AT EECPs

In addition to the survey, R2P monitors conducted protection monitoring through direct observation at all seven EECPs (GCA side). Observations by monitors was carried out throughout the year during visits to each of the EECPs. On those EECPs where the crossing was possible (Novotroitske EECP in Donetska Oblast and

Stanytsia Luhanska EECP in Luhanska Oblast), monitors were present all weekdays, during the working shift. The information below describes the situation at these two EECPs as of June. Tables below list key items and services expected at EECPs and indicate their availability for each EECPs.

	NOVOTROITSKE EECP	STANYTSIA LUHANSKA EECP
Waiting area (modules, sheds, seats, garbage bins)	✓	⚠
Health care unit with health workers	Première Urgence Internationale	International Committee of the Red Cross and the State Emergency Service medical staff
Air conditioning/ventilation	✓	✗
Heaters	✗	✗
Toilets	✓	✓
Transportation	✓	✓
Wi-Fi	✓	⚠
Disposable utensils	✗	✗
Potable water	✓	✓
Sanitary water	✓	✓
Soap/hand sanitizer/toilet paper	⚠	✓
Wheelchairs	⚠	✓
Beds/bed linen (in SES tents)	⚠	⚠
Observation facility	✓ Hostre settlement	✗
Free of charge rapid antigen tests	Since January	Since March
Paid PCR-test	✗	3 private laboratories The price is from 950 – 1200 UAH

✓ Sufficient amount/proper condition/convenient location

⚠ Insufficient amount/poor condition or inappropriate maintenance/inconvenient location

✗ Completely absent

# THE PROCEDURE OF CROSSING AT EECPs

## Novotroitske EECP (GCA side) – Olenivka CP (NGCA side)

### In order to cross from NGCA to GCA



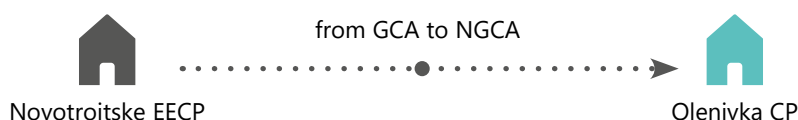
#### **NGCA side:**

1. Need to be placed on a list, compiled by de-facto authorities in NGCA:
  - Write an application to the NGCA "Emergency headquarters for fighting the spread of COVID-19" via an email or Telegram;
  - Attach supporting documents;
  - Wait for a response from the de-facto authorities within 14 days.
2. The passage of people took place every Monday and Friday.

**GCA side** – entry is free. But the conditions for compliance with quarantine restrictions were mandatory:

- The installation of Vdoma application is required;
- In cases where it is impossible to install the app, mandatory observation is required. People have the opportunity to pass a free COVID-test there (mobile ambulance team from Selydove arrives). If it is negative, they can be free from observation;
- There is an opportunity to take a free rapid-test at EECP. The result is known within 15 minutes. In case of a negative result, the data is automatically displayed in Vdoma app and the person is released from self-isolation.

### In order to cross from GCA to NGCA



**GCA side** – exit is free.

#### **NGCA side:**

1. Need to be placed on a list, compiled by de-facto authorities in NGCA (the conditions are the same as described above);
2. Passing a PCR test at Olenivka CP;
3. The passage of people took place every Monday and Friday.

## Stanytsia Luhanska EEC (GCA side) – Stanytsia Luhanska CP (NGCA side)

### In order to cross from NGCA to GCA



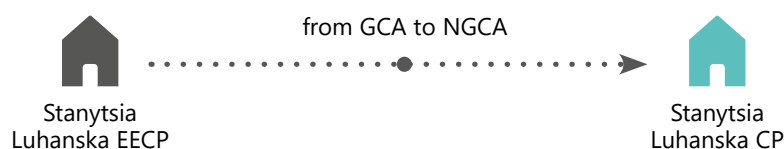
#### **NGCA side:**

1. According to the law of the de-facto authorities, entry and exit to the territory are allowed no more than once a month. However, according to the beneficiaries, this rule applies to people on a selective basis.

**GCA side** – entry is free. But the conditions for compliance with quarantine restrictions are mandatory:

- The installation of Vdoma application is required;
- There is an opportunity to take a free rapid-test at EEC. The result is known within 15 minutes. In case of a negative result, the data is automatically displayed in Vdoma app and the person is released from self-isolation.
- Passing a PCR test in three private laboratories. The result is known within 48 hours. In case of a negative result, the data is automatically displayed in Vdoma app and the person is released from self-isolation.

### In order to cross from GCA to NGCA



**GCA side** – exit is free.

#### **NGCA side:**

1. Need to have a residence registration in NGCA Luhansk Oblast;
2. According to the law of the de-facto authorities, entry and exit to the territory are allowed no more than once a month.



## OBSERVATIONS AT IBCPs

Due to the restrictions on crossing the contact line by de-facto authorities, many NGCA residents decided to go to GCA through the Russian Federation and cross the Russian-Ukrainian International Border Crossing Points in Milove and Hoptivka. This trip necessarily took much longer than crossing the contact line and incurred additional expenses for transportation and, in many cases, the payment of a fine for illegally crossing the border.

### Number of crossings at IBCPs and legal issues that people faced

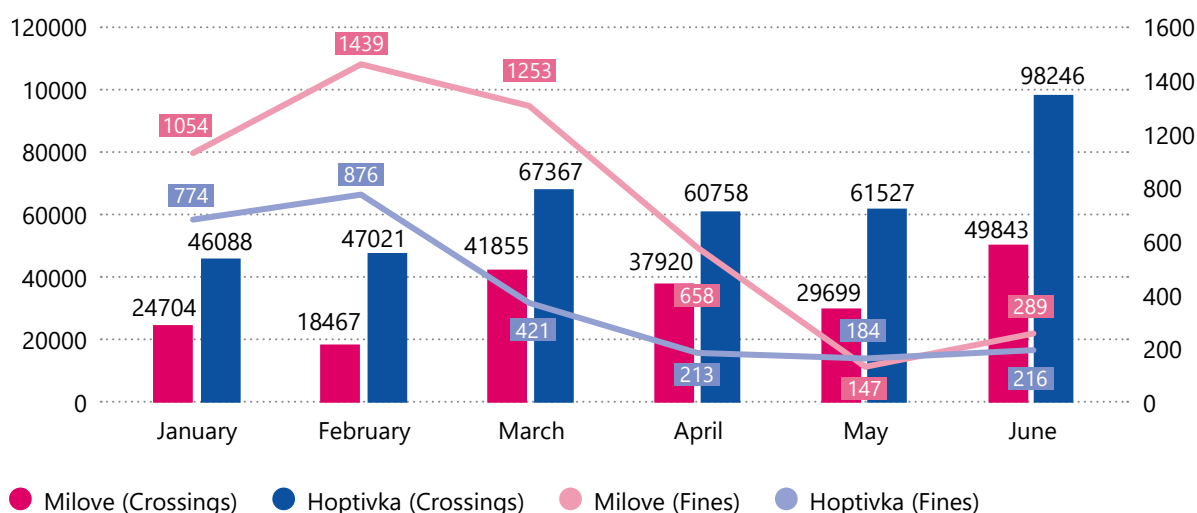
Monitoring at IBCPs and unofficial data received from SBGS stated that since the closure of the contact line, there was an increase in the flow of people crossing IBCPs. At Hoptivka IBCP share of NGCA residents consisted approximately 50 per cent while at Milove IBCP such share was 80-90 per cent, out of them, 10-15 per cent were residents of Luhanska Oblast NGCA, while all the rest were residents of Donetsk Oblast NGCA.

Also, unofficial data received from SBGS stated that they complied infringement notices daily. For certain categories of the population, such as pensioners, disabled persons or multi-child families, SBGS personnel could use a verbal warning instead of imposing a fine.

However, data obtained by R2P from the SBGS via information requests showed that the number of NGCA residents fined for illegal crossing under Article 204-2 of the Code of Administrative Offences remained considerable.

In response to this issue, an amendment to the COVID-19 quarantine legislation was proposed in 2020. The amendment suggested releasing citizens of Ukraine violating the procedure of entering and leaving the NGCA through IBCPs on humanitarian grounds from the administrative responsibility for the period of quarantine, or for the period of blocking of the EECPs. The amendment was adopted on 29 June in 2021, and signed by President on 22 July.

Number of crossings at IBCP (citizens of Ukraine only) and fines



In 2021, R2P legal team provided 140 persons who were fined for illegal crossing of the state border with legal support and court representation. Among them, 43 cases have been successfully completed, while 101 cases were still in progress as of report preparation.

### Conditions of crossing

R2P monitors did observation of services available on the Ukrainian side of the border points. The monitoring identified the need for certain services and some missing infrastructures at both border points, more particularly in Milove. See the table below for details.

	HOPTIVKA IBCP	MILOVE IBCP
Waiting area (modules, sheds, seats, garbage bins)		
Health care unit with health workers		
Air conditioning/ventilation		
Heaters		
Toilets	Paid	
Transportation		
Wi-Fi		
Disposable utensils		
Potable water		
Sanitary water		
Soap/hand sanitizer/toilet paper		
Wheelchairs		
Observation facility		 Milove settlement
Free of charge rapid antigen tests		 Paid
Paid PCR-test*	 900 UAH	 1100 UAH
Time of crossing the border**	About 2 hours	From 8 – 14 hours

Sufficient amount/proper condition/convenient location

Insufficient amount/poor condition or inappropriate maintenance/inconvenient location

Completely absent

\* Since 16 June, the Cabinet of Ministers of Ukraine, in connection with the country's entry into the "green" zone of epidemic danger, canceled the obligation to install the Vdoma app for those who enter Ukraine.

\*\* General time required for crossing both ukrainian and russian borders.



