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# **POLICY BRIEF**

## **EU ENLARGEMENT AND SECURITY DILEMMAS:**

### **INTEGRATING UKRAINE, MOLDOVA, AND GEORGIA AMID ONGOING RUSSIAN AND RUSSIAN-BACKED MILITARY PRESENCE**

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## Introduction

**The European Union’s plan to integrate Ukraine, Moldova, and Georgia faces a major challenge:** all three countries are grappling with unresolved territorial conflicts caused by Russia or Russian-backed forces. Since the collapse of the Soviet Union, Georgia has lost control over Abkhazia and South Ossetia, Moldova continues to face separatist claims in Transnistria, and Ukraine has been at war since 2014, following Russia’s illegal annexation of Crimea and its full-scale invasion in 2022. These ongoing security threats raise difficult questions about whether the EU can or should enlarge to include states that are partially occupied or under direct military threat from an aggressor state.

**Despite these security threats, Ukraine, Moldova, and Georgia<sup>1</sup> have made significant progress toward European integration and shown sustained political will to join the EU.** Over the past decade, all three have signed [Association Agreements with the EU and implemented Deep and Comprehensive Free Trade Areas](#) (DCFTAs), aligning many aspects of their economies and institutions with EU norms. After the Russian invasion of Ukraine in February 2022, the [three countries formally applied for membership](#). Ukraine and Moldova were granted candidate status in June 2022, followed by Georgia in December 2023. Accession negotiations officially began with Ukraine and Moldova in June 2024. These steps reflect both the resilience of these countries in the face of external threats and the EU’s recognition of their strategic importance.

**However, EU enlargement depends not only on external security conditions but also on the internal political health of candidate countries.** Democratic backsliding, weak rule of law, or restrictions on civil society can delay or even derail the accession process. Georgia’s adoption of a controversial [“foreign agents” law](#), suppression of media and opposition voices, and disputed elections, has led to a suspension of its membership talks. Moldova and Ukraine have also faced internal governance challenges, though both remain on a reform path encouraged by the EU. These dynamics show that enlargement is not just a geopolitical project but a political one, deeply tied to democratic values and institutional integrity.

**This raises a key question: can the EU’s enlargement process help resolve conflicts and build lasting security in the region, or does the presence of unresolved territorial disputes make accession unworkable?** While there are precedents of EU states with territorial disagreements, the scale and intensity of Russian involvement in these conflicts makes the current situation especially complex. Yet, enlargement may still serve as a long-term strategy for peace and democratic consolidation if managed carefully. Understanding this challenge is essential. Not only for shaping the future of Ukraine, Moldova, and Georgia, but also for defining the EU’s identity and credibility as a geopolitical actor in an increasingly unstable neighborhood.

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<sup>1</sup> Unfortunately, over the past year, the Georgian Government has increasingly derailed from the country’s pro-European path, despite strong public support for EU integration. It has initiated a political and legislative campaign that undermines democratic standards and contradicts the EU’s values and accession criteria. Most notably, the government reintroduced and advanced a controversial “foreign agents” law targeting civil society and independent media, legislation widely criticized as mirroring Russian-style tactics. It has also intensified rhetoric against the EU, accused Western partners of interference, and cracked down on peaceful protesters advocating for Georgia’s European future.

## I. Understanding the regional conflicts: key dynamics

*Summary:* This section outlines the territorial conflicts facing Georgia, Moldova, and Ukraine; three countries seeking EU membership while grappling with Russian or Russian-backed military presence. It explains how Georgia lost control over Abkhazia and South Ossetia, how Moldova remains divided by the unresolved status of Transnistria, and how Ukraine has faced an escalating war since Russia's annexation of Crimea in 2014 and the full-scale invasion in 2022. Despite varying levels of intensity, all three conflicts involve ongoing Russian influence that undermines sovereignty and complicates the EU accession process.

The **territorial conflicts in Georgia trace back to the early 1990s, when Abkhazia and South Ossetia, two regions within Georgia, declared de facto independence following violent conflicts against the central government in Tbilisi.** These conflicts resulted in the loss of Georgia's effective control over these territories, which have since functioned as unrecognized states. The [NATO Bucharest Summit in 2008](#), where Georgia was assured eventual alliance membership, coincided with rising tensions between Tbilisi and Moscow. Later that year, Russia invaded Georgia and officially recognized Abkhazia and South Ossetia as independent states. Over the past 30 years, these regions have remained outside Georgian jurisdiction, relying heavily on Russian military protection, economic aid, and diplomatic backing to sustain their autonomy. The EU, on its side, has [tried to play a role in conflict resolution efforts](#), co-chairing the Geneva International Discussions and deploying the EU Monitoring Mission (EUMM Georgia). It has also provided financial aid for conflict zone rehabilitation and consistently condemned Russia's military presence as a violation of international law. Despite firm support for Georgia's territorial integrity and efforts to facilitate dialogue with Abkhazia and South Ossetia, the conflicts remain unresolved. While the EU continues to promote peaceful solutions through diplomatic mechanisms, Russia's military, economic, and diplomatic backing has solidified the status quo, keeping these regions beyond Georgian control for over three decades.

However, describing Georgia's conflicts as entirely „frozen” overlooks Russia's direct military intervention in 2008, when it invaded Georgia under the pretext of protecting South Ossetia, effectively ending any possibility of Tbilisi regaining control over its breakaway territories. Since then, both Abkhazia and South Ossetia have functioned as de facto Russian protectorates, with Moscow stationing troops, granting citizenship to residents, and integrating them politically and militarily. While these conflicts have not escalated into full-scale war as in Ukraine, Russia's continued military presence and creeping „borderization” tactics, like shifting boundary markers deeper into Georgian territory, demonstrate that the situation is far from static. Instead, Georgia remains trapped in a state of suspended sovereignty over these regions, with Russian influence ensuring their detachment from Tbilisi while keeping the conflict unresolved.

**In Moldova's case, the territorial conflict centers on Transnistria, a breakaway region along the “left bank” of the Nistru River that constitutes approximately [12% of Moldova's territory. Home to about 350,000 residents, Transnistria declared de facto independence following a brief war in 1991–1992.](#)** Russia played a pivotal role in the conflict, deploying its 14th Army to intervene militarily, secure a ceasefire, and establish a demilitarized [Security Zone monitored by a Joint Control Commission \(JCC\)](#) involving Moldovan, Transnistrian, and Russian forces. Since then, Russia has maintained an unauthorized military presence in Transnistria, formally under the guise of peacekeeping, but in reality serving as a strategic instrument to exert influence over Moldova. Despite not

officially recognizing Transnistria's independence, Russia provides military, political, and economic support to the separatist regime. Diplomatic efforts, including the [OSCE-led 5+2 negotiation format](#) launched in 2005, have so far failed to resolve the region's status or end Russia's effective control.

**Thus, Moscow provides political backing, economic support, and military supplies to the separatist authorities, reinforcing their de facto autonomy and blocking Moldova's reintegration efforts.** Russia's continued presence and support for Transnistria remain a major obstacle to Moldova's sovereignty and European integration. The region exists in a geopolitical „grey zone”, where it is neither fully independent nor reintegrated into Moldova, but instead functions as a Russian-backed enclave with limited international recognition. [Russia's ongoing military presence of approximately 1,500 troops](#) further complicates Moldova's European aspirations, as it effectively cements Transnistria's separation while allowing Moscow to retain leverage over Moldova's political trajectory. This frozen conflict leaves Moldova in a precarious position, with its path toward EU integration hindered by unresolved territorial disputes and continued Russian influence.

**Last, Ukraine represents a unique case of territorial conflict within the three countries due to its ongoing active war.** Upon gaining independence from the Soviet Union, Ukraine initially maintained territorial integrity. However, [in 2014, following widespread protests that ousted President Viktor Yanukovich after he suspended an EU association agreement](#), Russia annexed Crimea and fomented separatist movements in Donetsk and Luhansk, sparking the conflict in the Donbas region. Unlike Moldova and Georgia, whose conflicts have largely transitioned to frozen states, Ukraine has faced continuous hostilities, particularly since Russia's full-scale invasion in February 2022. This escalation has deepened territorial divisions and posed significant challenges to the country's sovereignty. Today, [large portions of eastern and southern Ukraine remain occupied by Russian forces](#), while continued military offensives and drone strikes target critical infrastructure across the country. Unlike the separatist conflicts in Moldova and Georgia, Ukraine's war has a much larger scale, with shifting frontlines and direct conventional warfare. The destruction of cities, mass displacement of civilians, and ongoing security threats further complicate Ukraine's reconstruction and political stabilization.

Therefore, the ongoing Russian invasion of Ukraine adds a layer of complexity to its European integration. The country is tasked with adopting all EU measures and meeting the Copenhagen criteria while actively engaged in a defensive war, raising doubts about its capacity to reform its political and economic systems under such extraordinary circumstances. Additionally, Ukraine's long-term European trajectory depends not only on its own reforms but also on the geopolitical context. As long as Russian forces maintain control over parts of its territory and security concerns remain high, Ukraine's accession process will be fundamentally shaped by the broader regional conflict and the EU's willingness to integrate a country still at war.

**The question in all three countries' situations remains whether their territorial disputes and the presence of Russian and Russian-backed forces impede their EU membership.** The situation is further complicated by Russia's involvement through hybrid attacks and influence operations, which not only destabilize these countries but also challenge their ability to meet the Copenhagen criteria while grappling with external aggression. This issue is particularly complex, as these countries often face attacks directly or indirectly by a foreign power. From the EU's perspective, admitting countries with active conflicts or foreign military

presence raises significant political, legal, and security concerns. Ultimately, the question of whether the EU can integrate Moldova, Georgia, or Ukraine while parts of their territories remain under Russian influence is not merely a legal or technical one: it is a fundamentally political decision that will test the EU's strategic vision and unity in the face of ongoing geopolitical tensions.

## II. The regional security dilemma: buffer zones between East and West – Russia's selective revisionism and the EU's response

*Summary: Russia's selective revisionism in Georgia, Moldova, and Ukraine sustains instability through dynamic conflicts, manipulating breakaway regions to block Western integration and assert control. While the EU has condemned Russian aggression and offered economic and diplomatic support, its responses remain reactive, fragmented, and limited in strategic depth. In Georgia, Moscow's creeping annexation of Abkhazia continues unchecked; in Moldova, the energy crisis in Transnistria exposes both Russian coercion and new EU leverage; and in Ukraine, despite extensive EU aid and sanctions, the lack of collective defense mechanisms leaves Kyiv in a security limbo. Across all three cases, Russia weaponizes instability, while the EU struggles to match with a coherent and assertive strategy.*

**Russia's geopolitical strategy in the post-Soviet space is rooted in selective revisionism, where it seeks to alter territorial and political realities in neighboring countries, exploiting instability and controlling the narrative.** This strategy, marked by a rejection of established borders, not only challenges the sovereignty of states like Georgia, Moldova, and Ukraine but actively promotes conflicts that remain dynamic, preventing resolutions. Rather than frozen conflicts, Russia has strategically shaped a situation of controlled instability, where it can exert influence over breakaway regions and manipulate internal political dynamics, destabilizing countries and hindering their integration with Western structures.

**In contrast, the European Union's approach has been largely reactive, lacking a dedicated strategy to address these conflicts comprehensively.** Instead of a unified policy, the EU's engagement has been shaped by bilateral relations with affected states, often resulting in inconsistent responses. While the EU has condemned Russian aggression and imposed sanctions, its approach has sometimes been seen as partial and hesitant, balancing between supporting its Eastern partners and maintaining diplomatic channels with Moscow.

### Georgia's struggle for sovereignty

In Georgia, Russia has adopted a strategy that both mediates and manipulates the breakaway regions of Abkhazia and South Ossetia. Russia's role in these areas is framed by its support for Georgian political factions, particularly the Georgian Dream party, while presenting itself as a mediator between the breakaway regions and the Georgian state. A key development was the November 15th 2024 agreement in Abkhazia, where the Abkhazian parliament ratified a deal granting Russia the right to invest in and own land within the region. Protests erupted in the capital, Sukhum, against the Government's decision to allow Russian citizens to buy property, culminating in the seizure of the parliament building and the resignation of President Aslan Bzhania. While elections were set for February 2025, tensions with Russia remain unresolved.

Abkhazia's heavy reliance on Russian economic subsidies and services has exacerbated fears of losing sovereignty, especially after Russia cut subsidies and suspended vital resources to pressure the region. [Although Russia eased some restrictions to support Abkhazia's acting president, Badra Gunba](#), the larger crisis of balancing dependence on Russia with desires for autonomy persists. Meanwhile, Georgia's ongoing rapprochement with Moscow, driven by pro-Russian figures like Bidzina Ivanishvili, has raised further concerns in Abkhazia about its future. The controversial investment law and Russia's ongoing desire to influence Georgian politics show how Moscow preserves instability and limits Georgia's ability to fully integrate into European structures.

**In response to Russia's manipulation of Georgia's breakaway regions, the European Union has only engaged through limited diplomatic and monitoring efforts.** The Geneva International Discussions, the only existing negotiation format addressing the conflicts in Abkhazia and South Ossetia, have had little tangible effect in resolving tensions. [During the latest round in March 2025](#), Russia used the platform to renew pressure on Georgia, demanding that the ruling Georgian Dream party fulfil its pre-election promise to apologize to South Ossetia for the 2008 war. Moscow also demanded the formal delineation of borders between the separatist regions and Georgian-controlled territory, while representatives from Abkhazia and South Ossetia once again refused to engage on the issue of displaced persons, leading to walkouts and further stalling the talks. Moreover, the [EU Monitoring Mission, established in 2008, plays a role in observing the ceasefire lines from the Georgian-controlled side](#), ensuring transparency but lacking access to the Russian-occupied territories. Additionally, the EU's "Engagement Without Recognition" policy aims to foster dialogue and societal exchange without legitimizing Russian-backed separatist entities. While this approach has facilitated some humanitarian and economic exchanges, it has done little to counter Russia's deepening control over the regions. Overall, the impact politically and humanitarilly has not been significant.

**Economically, the EU has signaled openness to greater engagement with Abkhazia and South Ossetia, with discussions around extending Deep and Comprehensive Free Trade Agreement benefits to these regions.** However, no concrete steps have been taken, limiting the EU's leverage in providing economic alternatives to Russian influence. While the EU's involvement remains constrained by its cautious diplomacy, recent developments, such as Russia's growing economic footprint in Abkhazia, highlight the need for a more proactive European strategy. Without stronger incentives for integration and a firmer stance against Russia's creeping annexation, the EU risks reinforcing the very instability it seeks to mitigate.

### **Energy crises and geopolitical shifts in Moldova**

The ongoing energy crisis in Moldova, particularly in the breakaway region of Transnistria, underscores the intensifying geopolitical contest between the European Union and Russia. Historically reliant on electricity from the Kuciurgan power plant in Transnistria, powered by Russian gas, Moldova found itself in crisis after Ukraine [ended its gas transit deal with Russia on January 1, 2025](#), effectively halting Gazprom's deliveries to both Moldova and Transnistria. The nature of the crisis, however, has evolved from a short-term energy disruption into a slow-motion economic collapse for the Transnistrian regime. Since the cessation of free Russian gas, the region's economic foundations, built on heavily subsidized energy, have deteriorated rapidly. [The three core financial pillars of the separatist budget](#): the local gas payment fund, industrial revenues from export-oriented factories like Tirotext and the Rîbnița steelworks, and

electricity sales to Moldova, have all collapsed. [Exports fell by 57%](#) in the first quarter of 2025, and industrial activity was put in danger due to insufficient gas supply. Meanwhile, Moldova's refusal to resume electricity imports from Transnistria has cut off the region's most vital hard currency source.

In response, the European Union offered both immediate relief and a [€60 million aid package and emergency gas supplies](#) as part of a two-year energy resilience plan, aimed at stabilizing the situation on both banks of the Dniester. The proposal included emergency gas deliveries and humanitarian aid for schools, hospitals, and households, but [was contingent on gradual energy tariff reforms, respect for human rights, and the exclusion of large industrial consumers](#). However, under reported pressure from Moscow, Transnistrian authorities rejected the offer, despite the region's worsening economic conditions. [Prime Minister Dorin Recean confirmed that Russia blocked the aid over fears of losing political control](#). This shift, nonetheless, not only undermined the narrative of Russian protection but also gave Chişinău a rare moment of leverage in its decades-long standoff with the separatist enclave.

**Despite the refusal, Moldova has stepped in to ensure continued gas flow** to Transnistria via a [deal involving Hungary's MET Gas and Dubai-based JNX General Trading](#). Chisinau's gas deal, conditioned on political concessions such as the release of political detainees and the reinstatement of Moldovan public television, marks the first time Tiraspol has had to formally negotiate with the Moldovan government under economic duress. Therefore, the Kremlin's tactic to use winter as a destabilizing weapon failed, and Transnistria's increasing reliance on Chisinau and EU infrastructure may signal a shift in the relations between the regions. Ironically, while Russia seeks to maintain influence over the region, it has failed to directly support Transnistria's energy needs, leaving the EU and Moldova to fill the gap. This dynamic reveals the limits of Russian leverage and highlights the EU's growing role as a stabilizing force. As the region's energy future hangs in the balance, the situation illustrates how control over energy resources and their financing has become central to Moldova's broader struggle between east and west.

**The implications of this crisis extend beyond energy security.** Moldova's government, under the pro-European leadership of [Maia Sandu, has framed the crisis as another example of Russian aggression](#), using it to rally international and domestic support for EU integration. However, pro-Russian opposition figures such as [Ilan Shor continue to exploit the situation](#), portraying Chisinau's alignment with the EU as a liability. Public sentiment in Moldova remains divided, particularly in Transnistria, [where Russian-backed narratives still dominate](#), as seen during the referendum of 2024 intended to amend the Constitution to include the commitment to EU membership. Yet, the practical realities of the crisis have led to an unprecedented level of cooperation between Chisinau and Tiraspol. Transnistria, for the first time, has had to formally negotiate with Moldova for essential resources rather than rely on Russian patronage. This creates a window of opportunity for the EU and Moldova to condition further assistance on political and economic integration measures, such as the repeal of [Transnistria's 2016 law on harmonization with Russia and alignment of fiscal and social policies with Chisinau](#). If Transnistria becomes increasingly reliant on EU-backed solutions, its economic survival may become inseparable from Moldova's European trajectory.

**Moreover, beyond this emergency energy aid, the EU has shaped the region's economic dependencies through policies like the [2003 travel ban on 17 Transnistrian leaders](#) after Russia's Kozak memorandum failed and the establishment of the [European Border Assistance Mission in 2005 to curb smuggling and regulate trade](#).** More significantly,

Transnistria's participation in the EU's Deep and Comprehensive Free Trade Agreement has shifted its economic orientation with [over 60% of its exports now go to the EU](#). Since 2022, Russia's war in Ukraine has further isolated Transnistria, severing trade and logistical routes, making the breakaway region more dependent on Chisinau than ever. Moldova has leveraged this vulnerability through a "small steps" reintegration strategy, including the [introduction of customs duties in January 2024](#) to integrate Transnistrian businesses into Moldova's fiscal framework. With EU-backed energy assistance now critical to the region's stability, Brussels and Chisinau have a unique opportunity to condition further aid on deeper economic and administrative alignment. If sustained, these measures could make Transnistria's reintegration into Moldova less a matter of political negotiation and more a structural inevitability.

### **Ukraine's ongoing battle for territorial integrity and European integration**

Last, regarding Ukraine, since 2014, Russia has systematically violated Ukraine's territorial integrity, pursuing an aggressive expansionist strategy aimed at weakening the country and obstructing its integration into Western political and security structures. Russia's involvement in Ukraine goes beyond simple territorial occupation; [it has transformed regions like Crimea and parts of eastern Ukraine into controlled zones, staffed with Russian citizens](#) and administrative structures. These regions are effectively governed by Russia, [with Russian citizenship offered to local populations](#) and military forces stationed to cement Moscow's control. In response to Ukraine's resistance, which has altered the power dynamics on the battlefield, Russia has continued to escalate its military presence and support for proxy forces, [rejecting ceasefire proposals and peace plans that require territorial concessions](#). Through this occupation, Russia seeks to neutralize any potential NATO or EU influence, while presenting its own vision for Ukraine's future, one that includes ceding a significant portion of its territory. As of May 2025, however, [despite new rounds of peace talks in Istanbul](#), Russia continues to demand unacceptable territorial withdrawals, stalling any meaningful progress.

**The European Union has continued to intensify its response to Russia's aggression against Ukraine.** By 2025, the EU had implemented [16 sanction packages targeting Russia's economy, energy sector, and financial institutions](#). These measures include asset freezes on individuals and entities connected to Russia's military-industrial complex, bans on Russian crude oil storage in the EU, and restrictions on dual-use goods and advanced technology exports. Additionally, [sanctions were extended to Belarus and Russian-controlled areas in Ukraine](#), further tightening economic pressure on Moscow. In parallel, the EU has reinforced Ukraine's defense capabilities through the European Peace Facility, which has financed military aid. In 2024 alone, the EU allocated a [€35 billion macro-financial assistance package to sustain Ukraine's economy and military efforts](#). This package leverages extraordinary profits from immobilized Russian assets and represents a significant commitment to Ukraine's recovery and resilience amidst ongoing conflict. Thus, the EU is undergoing a significant recalibration of its defense posture through these measures, particularly with "[ReArm Europe](#)," an initiative aimed at mobilizing €800 billion by combining national defense spending with joint EU debt. For example, [Poland is doubling the size of its military and increasing defense spending to 4.7% of its GDP](#), while [Germany is contemplating suspending its constitutional debt brake](#) to fund crucial strategic upgrades.

However, despite these robust measures, the EU faces structural limitations in its security commitments. Unlike NATO, which operates under a collective defense mechanism (Article 5 of the NATO Treaty), the EU lacks a comparable framework. Article 42.7 TEU, [the EU's](#)

[mutual defense clause, remains vague and largely untested](#), with its only invocation occurring after the [2015 terrorist attacks in France](#). While this clause obliges member states to provide aid and assistance by all means available in cases of armed aggression, it offers flexibility regarding how such support is provided and lacks the operational clarity of NATO's defense protocols. This instrument leaves significant discretion to member states regarding the nature and extent of support to be provided and lacks clear mechanisms for implementation or coordination at the EU level.

**Historically, no country at war has ever joined the EU, as security guarantees have always been provided by NATO first.** This places Ukraine in a unique security dilemma, as it seeks EU accession while lacking the protection of NATO membership. Despite strong political support, the EU's ability to act as a security provider remains constrained, reinforcing Ukraine's reliance on Western military aid outside of the EU framework. However, it is important to note that neither the [Copenhagen criteria](#) nor EU primary and secondary law explicitly prohibit a country at war from joining the EU. While the practical and security challenges of admitting a country engaged in an active conflict are significant, there is no legal barrier that would prevent Ukraine's accession a priori. Also, it is important to recognize that the Ukraine that will eventually join the EU will not be the Ukraine of today. By the time of accession, the country will likely no longer be at war, and its political, economic, and security landscape will have significantly evolved. Surely, post-war reconstruction and the possible reintegration of territories will reshape Ukraine, making its accession process different from what it would be under current conditions. However, the main question is not merely whether Ukraine can join the EU while at war, but rather how the EU can support its transformation into a country ready for membership.

In all three cases, Russia is not simply freezing conflicts but is actively using them to shape the political and territorial landscape, ensuring that its influence remains dominant while destabilizing the efforts of these countries to chart an independent course.

### **III. The Trio's divisions and conflicts do not preclude EU membership**

*Summary: The territorial conflicts within Ukraine, Moldova, and Georgia do not automatically preclude EU membership, as shown by the precedent of Cyprus, which joined the EU in 2004 despite its ongoing division. The EU managed Cyprus's situation through Protocol 10, which suspended EU law in the Turkish-controlled north while maintaining future reintegration mechanisms, and the Green Line Regulation, which allowed cross-border trade without recognizing secession. This legal and political flexibility provides a potential model for the Trio, though each case requires adaptation: Moldova's frozen conflict aligns most closely with Cyprus, Ukraine faces the greatest challenge due to active war, and Georgia may benefit from a hybrid approach. Unlike Cyprus, however, the Trio faces a hostile Russia rather than an EU-linked actor like Turkey, meaning that legal tools must be reinforced by robust diplomatic and security strategies.*

## Cyprus: a past enlargement case study

**The divisions and conflicts within the Association Trio do not necessarily preclude EU membership.** A prime example is Cyprus, whose [ongoing territorial division did not prevent its accession to the EU in 2004](#). Therefore, the European Union's approach to Cyprus provides a potential legal and political framework for Ukraine, Moldova, and Georgia's EU accession despite their ongoing territorial conflicts. [Cyprus joined the EU in 2004 as a divided state, with the northern part under Turkish control](#). To accommodate this reality, the EU adopted [Protocol 10 of the Treaty of Athens \(2003\)](#), which suspended the application of EU law in the areas not under the effective control of the Republic of Cyprus while committing to economic development initiatives to foster future reunification. Additionally, [the Green Line Regulation of 2004](#) was created and established rules for movement and trade across the division, ensuring economic ties between the two parts of the island. This precedent demonstrates that unresolved conflicts do not automatically block EU accession, as temporary legal frameworks can manage territorial disputes while maintaining a country's integration trajectory. The legal framework that allowed Cyprus to join the EU despite its division is based on three main pillars.

- First, Protocol 10 of the Treaty of Athens [suspended the \*acquis communautaire\* in areas not under the effective control of the Republic of Cyprus](#). The protocol also included a mechanism allowing EU law to automatically extend to the entire island if reunification occurs, ensuring a smooth legal transition. Additionally, Article 3 of Protocol 10 committed the European Commission to [promoting economic development in northern Cyprus and fostering its rapprochement with the EU through access to EU funding](#).

Protocol No 10

on Cyprus

THE HIGH CONTRACTING PARTIES,

REAFFIRMING their commitment to a comprehensive settlement of the Cyprus problem, consistent with relevant United Nations Security Council Resolutions, and their strong support for the efforts of the United Nations Secretary General to that end,

CONSIDERING that such a comprehensive settlement to the Cyprus problem has not yet been reached,

CONSIDERING that it is, therefore, necessary to provide for the suspension of the application of the *acquis* in those areas of the Republic of Cyprus in which the Government of the Republic of Cyprus does not exercise effective control,

CONSIDERING that, in the event of a solution to the Cyprus problem this suspension shall be lifted,

CONSIDERING that the European Union is ready to accommodate the terms of such a settlement in line with the principles on which the EU is founded,

CONSIDERING that it is necessary to provide for the terms under which the relevant provisions of EU law will apply to the line between the abovementioned areas and both those areas in which the Government of the Republic of Cyprus exercises effective control and the Eastern Sovereign Base Area of the United Kingdom of Great Britain and Northern Ireland,

DESIRING that the accession of Cyprus to the European Union shall benefit all Cypriot citizens and promote civil peace and reconciliation,

CONSIDERING, therefore, that nothing in this Protocol shall preclude measures with this end in view,

CONSIDERING that such measures shall not affect the application of the *acquis* under the conditions set out in the Accession Treaty in any other part of the Republic of Cyprus,

HAVE AGREED UPON THE FOLLOWING PROVISIONS:

Article 1

1. The application of the *acquis* shall be suspended in those areas of the Republic of Cyprus in which the Government of the Republic of Cyprus does not exercise effective control.

2. The Council, acting unanimously on the basis of a proposal from the Commission, shall decide on the withdrawal of the suspension referred to in paragraph 1.

Source: *Official Journal L 236*, 23/09/2003 P. 0955 - 0955

- Second, the Green Line Regulation (2004) clarified that the division did not constitute an external EU border. Instead, it established the terms under which goods and people could cross from the non-government-controlled areas to the government-controlled areas, ensuring economic connectivity while preventing full political recognition of the self-declared Turkish Republic of Northern Cyprus (TRNC).
- Third, Cyprus' EU accession was facilitated by its regional context, as both Greece and Turkey were deeply embedded in European and Euro-Atlantic institutions. Greece was already an EU and NATO member, while Turkey had been in the EU accession pipeline for decades. This institutional framework provided avenues for diplomatic engagement, which played a role in stabilizing the situation.

However, while Cyprus offers a useful model, its application to Ukraine, Moldova, and Georgia must consider the distinct geopolitical and security realities of these states. Even though the Cyprus framework offers a potential roadmap for managing territorial disputes during EU accession, Ukraine, Moldova, and Georgia face distinct challenges that require adjustments to this approach.

- Moldova's case is the most applicable, as Transnistria already relies on economic ties with the EU. A Protocol 10-style provision could facilitate integration while negotiations continue.
- Ukraine's situation is the most challenging, as it remains in an active war. A suspended application of EU law in occupied areas could work legally, but security concerns remain unresolved.
- Georgia could benefit from a hybrid approach, leveraging existing EU diplomatic efforts while adopting an economic integration strategy similar to Moldova.

A major difference is that [Greece and Turkey were both part of European and Euro-Atlantic structures](#), facilitating diplomatic engagement over Cyprus, whereas Russia remains actively opposed to the European integration of all three states. Additionally, Cyprus had been stable for decades before accession, whereas Ukraine, Moldova, and Georgia continue to face active or frozen conflicts. The Cyprus model proves that unresolved conflicts do not automatically block EU membership, but Ukraine, Moldova, and Georgia require adapted frameworks given their distinct geopolitical and security realities. While legal provisions like Protocol 10 and the Green Line Regulation could be applied, they must be accompanied by stronger security and diplomatic measures to account for the active role of Russia in these conflicts. In all cases, EU accession should not be indefinitely delayed due to unresolved territorial disputes, but solutions must be tailored to balance legal, economic, and security considerations. The EU must recognize that each case is unique and requires a flexible, case-by-case approach that prioritizes economic integration while managing territorial complexities.

**Comparative table: EU integration and security dilemmas in Cyprus, Moldova, Ukraine, and Georgia**

	<b>Cyprus</b>	<b>Moldova</b>	<b>Ukraine</b>	<b>Georgia</b>
<b>External Actor</b>	Turkey (NATO member, non-EU) : controls northern Cyprus	Russia : military presence in Transnistria and influence over energy/security	Russia : full-scale war since 2022; previously occupied Crimea, Donbas	Russia : occupies Abkhazia and South Ossetia since 2008 war
<b>Security status</b>	Frozen conflict since 1974; divided island but no active fighting	Frozen conflict in Transnistria; Russian peacekeepers maintain de facto separation	Active war; large-scale Russian invasion and occupation; continuous military and civilian casualties	Frozen conflicts; sporadic escalations; Russia maintains control through local proxy forces
<b>EU integration</b>	Full EU member since 2004, but <i>acquis</i> suspended in north	EU candidate status (2022); progressing slowly under pressure from Russia	EU candidate status (2022); high public support, but integration slowed by war and reforms under strain	EU candidate status (2022); reform progress mixed, hindered by territorial disputes
<b>NATO status</b>	Not a NATO member due to geopolitical complications with Turkey	Constitutionally neutral; cooperation with EU missions, but no military alliances	Aspires to join NATO; deeply integrated with NATO standards; strong military aid from West	Aspires to NATO membership; participated in NATO missions; hampered by unresolved territorial conflicts
<b>Economic link to EU</b>	Partial trade across Green Line; economic asymmetry between north and south	Deep and Comprehensive Free Trade Area (DCFTA) with EU; 80% of exports go to EU	DCFTA suspended due to war; major trade disruption, yet massive financial and military support from EU	DCFTA in place; trade potential limited by Russian control of key regions and weak domestic infrastructure
<b>Geopolitical context</b>	Member of EU, but split identity: anchored in EU/NATO (Greece) vs. Turkey's influence	Geopolitical pivot to EU, but deeply exposed to Russian energy leverage and domestic vulnerabilities	Frontline state in West-Russia confrontation; seeks irreversible Western alignment	Strategic EU/NATO partner; balancing aspirations with pressure from Moscow and internal political divides

## IV. Recommendations

Recent geopolitical developments have created a unique, if not challenging, window of opportunity for resolving territorial conflicts in Eastern Europe. The consolidation of EU borders, regulatory tightening, and the unraveling of Russian leverage in places like Transnistria and Nagorno-Karabakh suggest that previously frozen conflicts are now entering more fluid phases. While full synchronization between EU integration and conflict resolution may not be feasible, [as Moldovan Deputy Prime Minister Oleg Serebrian notes](#), the momentum generated by accession talks can influence reintegration processes by raising political and economic costs for maintaining unresolved disputes. In this context, the EU has a chance to move from passive conflict management to proactive conflict transformation.

To seize this opportunity, the EU should pursue a coordinated strategy that links enlargement with progress on governance, connectivity, and societal resilience in conflict-affected areas.

### *1. Deepening economic integration via DCFTAs and expanding beyond*

While the Deep and Comprehensive Free Trade Areas (DCFTAs) with Ukraine, Moldova, and Georgia are already fully implemented, the EU can still take significant steps to enhance their impact by focusing on deeper integration in key areas beyond traditional trade. The EU should focus on reducing non-tariff trade barriers that may still exist and provide continued technical assistance to businesses in these countries, particularly those in conflict-affected regions. Expanding integration into digital trade, services, and investment can unlock new opportunities for these economies and strengthen ties to the EU single market. Additionally, the EU should establish dedicated investment funds to support economic development in these regions, especially in areas with lingering tensions or conflict, by prioritizing projects that create jobs, improve infrastructure, and bolster the growth of small and medium-sized enterprises (SMEs). Cross-border infrastructure development should be encouraged, particularly in energy, transport, and communication sectors, to further connect these countries with the broader EU economy. Facilitating joint business ventures, cultural exchanges, and environmental projects will not only improve the economic prospects of these nations but also foster peace and cooperation across conflict lines.

### *2. Conditional engagement in conflict zones*

While direct support for separatist regions risks legitimizing unrecognized authorities, avoiding engagement altogether can leave populations vulnerable and reinforce division. A conditional engagement strategy is necessary to ensure that humanitarian aid reaches those in need without legitimizing separatist regimes. The EU should channel support through neutral third parties, such as UN agencies or well-established international NGOs, which can provide essential services like healthcare, education, and infrastructure development without reinforcing political divisions. Further, youth from conflict zones should be given access to EU-funded scholarships and vocational training, helping to connect them with Europe and expose them to the benefits of peaceful coexistence. On the political front, engagement with de facto authorities in these regions should be strictly for humanitarian purposes and conditioned on clear standards of transparency and adherence to human rights. This approach ensures that the EU's support reaches the people who need it the most while avoiding any validation of separatist structures. In this way, the EU can foster resilience in these regions without compromising its core values of peace and unity.

### *3. Promoting confidence-building and reconciliation*

Sustainable peace requires a comprehensive approach that includes societal healing and the rebuilding of trust between divided communities. The EU should invest significantly in civil society organizations that focus on reconciliation, interethnic dialogue, and addressing trauma in communities affected by long-standing conflict. Supporting grassroots initiatives such as joint community projects (in education, environmental sustainability, or local economic development) can provide opportunities for people to collaborate across divides. These initiatives offer concrete, shared goals that help to rebuild trust and diminish the influence of divisive rhetoric. In addition, media literacy programs should be funded to combat the spread of disinformation and hate speech, which often fuel conflict and reinforce divisions. By working with local media outlets, tech companies, and journalists, the EU can help counteract propaganda and promote narratives that emphasize cooperation and mutual benefit. These confidence-building measures are crucial for fostering the social cohesion necessary for long-term peace and reintegration.

### *4. Investing in cross-border infrastructure and connectivity*

One of the key challenges in regions affected by territorial conflicts is physical disconnection, which exacerbates political fragmentation and reinforces the status quo. The EU should prioritize investments in cross-border infrastructure projects that enhance connectivity between regions affected by conflict and the broader EU market. Projects such as road networks, rail connections, and energy grids are vital for improving the flow of goods, people, and information across borders, and can significantly reduce isolation in conflict zones. This would not only provide immediate economic benefits but also send a strong signal of EU commitment to integration and development in these regions. The EU should also ensure that these infrastructure projects benefit all communities equally, including those in contested territories. By involving local populations in the planning and implementation of these projects, the EU can foster a sense of ownership and ensure that the infrastructure serves the broader goal of regional integration, economic development, and conflict resolution. Over time, this increased connectivity could help dissolve the physical and psychological borders that sustain territorial divisions.

### *5. Developing a comprehensive EU Black Sea Strategy*

A fragmented approach to security, trade, and energy policy in the Black Sea region weakens the EU's position and limits its ability to address the interconnected conflicts affecting Ukraine, Moldova, Georgia, and Turkey. The EU should develop a comprehensive Black Sea Strategy that not only addresses the region's security challenges but also promotes cooperation across energy, trade, and environmental issues. This strategy would provide a unified framework for regional cooperation, involving not only the EU's Eastern Partnership countries but also NATO members like Turkey and Romania. The strategy should include demilitarization efforts, supported by the OSCE and other international bodies, and provide technical assistance for professional, accountable, and human rights-compliant security forces in conflict zones. Additionally, the EU should prioritize civilian oversight mechanisms to ensure that security forces remain accountable and operate in a manner that respects human rights. Finally, this strategy should integrate policies that enhance regional cooperation, particularly in energy security, trade, and environmental protection, while working to reduce Russia's influence in the region. A comprehensive approach like this would

help the EU become a stronger regional actor and offer a sustainable framework for resolving territorial conflicts and fostering long-term peace.

## Conclusion

European integration is not inherently a process designed to resolve conflicts, but it can have a significant impact on conflict resolution. By aligning countries with EU standards and fostering cooperation, the EU's role becomes pivotal in reducing tensions and providing frameworks for peaceful dialogue. As countries like Ukraine, Moldova, and Georgia get closer to EU membership, this trend can be seen as a positive development. Their integration into the EU not only improves governance and stability within these countries but also has the potential to lead to broader regional peace and conflict resolution. In this light, the EU's influence goes beyond just political and economic growth; it becomes a key driver in transforming entrenched territorial disputes into opportunities for collaboration and long-term peace.

As these countries move closer to European Union membership, their accession should be understood not only as a response to Russian aggression but as part of a broader agenda for regional stabilization and democratic consolidation. While unresolved territorial conflicts present serious obstacles, they are not definitive barriers to integration. The European Union should adopt adaptable and context-specific strategies that enable institutional inclusion alongside conflict mitigation. The example of Cyprus illustrates how the application of tailored legal frameworks and strategic ambiguity can preserve the integrity of the enlargement process without endorsing territorial fragmentation. The goal is not for European integration to resolve conflicts unilaterally, but to create a political and legal environment in which violent disputes become less viable and negotiated solutions more attractive. By embedding contested states within a community of rules and shared interests, the EU strengthens their resilience against external coercion and internal fragmentation. In doing so, it reaffirms its founding purpose as a peacebuilding union and extends its stabilizing presence to the periphery of the European continent.

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