



Sioufas & Associates
Law Firm

AMENDMENT OF THE LEGISLATIVE FRAMEWORK FOR CROSS BORDER EMPLOYMENT TRANSFERS OF THIRD-COUNTRY CITIZENS

www.sioufaslaw.gr



Under Law 5038/2023, the categories of residence permits for employment available to third-country nationals are established. Pursuant to Article 26 of the law, **Ministerial Decision No. 56/23.12.2024** (Official Gazette A'210/30.12.2024) was issued, determining the **maximum number of positions for dependent and seasonal work by occupation**, including **highly qualified employment** for third-country citizens, for the year 2025. Based on this new decision, the available positions **are distributed nationwide**, rather than by geographic region (as was previously the case).

Additionally, according to **Circular No. 287457/27.11.2024**, titled "*Electronic Submission of Employer Requests for the Approval of Employment of Third-Country Nationals*," the **process** for submitting applications for the employment of third-country citizens is now conducted **electronically**. Employers may designate their legal representatives and upload the required documentation for each category of employment through a dedicated platform. Specifically, the electronic process applies to the following categories of employment approvals:

Piraeus

6th Neou Falirou St.
floor
GR-182 33, Ag. I. Renti
tel: +30 210 3673000
fax: +30 210 3673070
email: info@sioufaslaw.gr
website: www.sioufaslaw.gr

Thessaloniki

3 Nikiforou Ouranou St.
GR-546 27, Thessaloniki
tel: +30 231 6005800
fax: +30 231 6005899

Patra

65 Othonos-Amalias Ave.
GR-262 22, Patra
tel: +30 261 0226549
fax: +30 261 0242971

Romania

76 Splaiul Unirii, River Plaza Tower A 7th
Bucharest, District 4, P.C.040037
tel: +40 372 171778
fax: +40 372 171779
email: info@sioufaslaw.ro
website: www.sioufaslaw.ro





1. Approval of employment – highly qualified employment (E1)
2. Approval of employment – intra-company transfer permit (E2)
3. Approval of employment for special purposes (E3)
4. Approval of employment – dependent work (E4)
5. Approval of employment – dependent work in the agricultural sector (E4)
6. Approval of employment – seasonal work in the agricultural sector (E5)
7. Approval of employment – seasonal work in fisheries (E5)
8. Approval of employment – seasonal work in the tourism sector (E5)

Clarifications Provided under the New Procedure

Given the modifications to the submission process and the allocation of available positions by occupation for dependent and seasonal employment, as well as highly qualified employment, a new **Circular** issued by the Ministry of Migration and Asylum, titled "*Electronic Submission of Employer Requests under the Provisions of Law 5038/2023 – Completion of Available Electronic Services & Implementation of Articles 26 and 27 of Law 5038/2023*," provides the following clarifications:

- **Courier Service Submissions (Until 31.12.2024):**

One-stop services accepted requests for employment approvals via courier services, provided they were submitted by 31.12.2024. If applications are received after 31.12.2024, the sender must be informed that electronic submission is mandatory.

- **Processing of Applications Submitted by 31.12.2024:**

Applications submitted by 31.12.2024, whether via courier service or electronically, will be processed by the competent services. Positions will be reserved based on the previously applicable Joint Ministerial Decision issued under Law 4251/2014.



- **Applications Submitted Electronically After 01.01.2025:**

Applications submitted electronically after 01.01.2025 will be processed, and positions will be reserved in accordance with the Ministerial Decision No. 56.

Maria Aikaterini Papadopoulou
Lawyer

LLM in History and Theory of Law, Law School of Athens, National and Kapodistrian University of Athens

LLM in Civil Law, Law School of Athens, National and Kapodistrian University of Athens

LLM in Commercial Law, Law School of Democritian University of Thrace

Piraeus

6^A Neou Falirou St.
floor

GR-182 33, Ag. I. Renti
tel: +30 210 3673000
fax: +30 210 3673070

email: info@sioufaslaw.gr
website: www.sioufaslaw.gr

Thessaloniki

3 Nikiforou Ouranou St.

GR-546 27, Thessaloniki
tel: +30 231 6005800
fax: +30 231 6005899

Patra

65 Othonos-Amalias Ave.

GR-262 22, Patra
tel: +30 261 0226549
fax: +30 261 0242971

Romania

76 Splaiul Unirii, River Plaza Tower A 7th

Bucharest, District 4, P.C.040037
tel: +40 372 171778
fax: +40 372 171779
email: info@sioufaslaw.ro
website: www.sioufaslaw.ro

