

FACTS AND SOURCES

Delays in residence legalisation in Poland

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Polish statute names, article numbers and court case references are kept in the original — that is how they are searched for in official databases.

Five numbers, if you read nothing else

Statutory deadline for a residence decision	60 days
Average time taken	341 days
Cases awaiting decisions by provincial governors	463,487
Times the "temporary" suspension of deadlines has been extended	5
New posts in foreigners' affairs departments since 2021	0

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1. Statutory deadlines versus reality

Not one province meets the statutory deadline — even the fastest exceeds it fourfold.

The law gives the provincial governor 60 days to decide a temporary residence case (art. 112a ust. 1 of the Act on Foreigners), and EU law allows 90 days for an EU Blue Card (art. 11 of Directive 2021/1883). Meanwhile, according to the Interior Ministry's own figures, the average temporary residence and work case takes **341 days**, with **463,487 cases pending** — in that single category alone.

Average time by province

Province	Days
Silesia	658
Pomerania	598
Masovia	394
Łódź	386
Greater Poland	339
Holy Cross	325
Lesser Poland	242

Breakdown of 26,877 decisions by the Masovian Provincial Office: **3% took more than 24 months (738 cases)**, 9% took 18–24 months, 29% took 12–18 months.

Nor is this time "on the applicant's side": the Supreme Audit Office documented periods of pure administrative inaction of **92–779 days**, including **15–448 days before anyone took the first step** in a case.

Sources: Ministry of the Interior, replies to parliamentary questions no. 12584 (as of 13.10.2025) and no. 18089 (as of

2. Article 100d — what it actually does, and how it was extended

The state did not suspend the queues — it suspended responsibility for them. By statute, it legalised its own inaction.

Article 100d of the Act on Assistance to Ukrainian Citizens does not "prohibit" filing a *ponaglenie* (a formal reminder to the higher authority) or a complaint for inaction — it renders them **ineffective**:

- the running of deadlines for deciding them "does not begin, and if begun is suspended" (para. 1);
- provisions on administrative inaction are disapplied (para. 3(1)) — including art. 36 of the Code of Administrative Procedure, so the office need not even notify the party that the case will not be decided on time;
- courts may not fine a silent authority (para. 3(2));
- delay "cannot be a basis for invoking legal remedies" (para. 4).

Scope: temporary residence, permanent residence and EU long-term resident permits before a provincial governor — for **every foreigner, not only Ukrainian citizens**. It does not cover citizenship (confirmed by the Commissioner for Human Rights, submission XI.541.119.2025 of 24.10.2025).

A timeline of "temporariness"

The suspension has run without interruption since 1 January 2023 and has been extended **five times**, as a rule just before expiry — the last two extensions came 1 day and 8 days before the deadline.

Extended to	Instrument
24.08.2023	Dz.U. 2023 poz. 185 (retroactively)
4.03.2024	Dz.U. 2023 poz. 1088
30.06.2024	Dz.U. 2024 poz. 232
30.09.2025	Dz.U. 2024 poz. 854
4.03.2026	Dz.U. 2025 poz. 1301
4.03.2027	Dz.U. 2026 poz. 203

Year after year the same "exceptional circumstances" — the fourth consecutive year, with the latest extension reaching into the fifth.

Sources: api.sejm.gov.pl/eli/acts/DU/2025/337/text.pdf (pp. 99–100) · subsequent Dz.U. as in the table (api.sejm.gov.pl/eli).

3. The courts refuse to apply it — and the government extended it anyway

The ministry admits in writing that it is maintaining a provision its own courts will not apply.

Supreme Administrative Court

Judgment **II OSK 2921/24** (19.05.2025): the Supreme Administrative Court held Article 100d (as regards the period from 1.07.2024) incompatible with art. 45(1) in conjunction with art. 31(3) of the Constitution and **refused to apply the statutory provision**; it described the extension in Dz.U. 2024 poz. 854 as being in "manifest conflict" with art. 47 of the EU Charter of Fundamental Rights. Likewise II OSK 2940/24 and II OSK 1087/25.

The ministry admits this in writing

Letter to the Commissioner for Human Rights, ref. BMP.0790.3.7.2026(6), June 2026, verbatim:

"despite the formal force of art. 100d [...] there is a high probability that a provincial administrative court [...] will, as regards periods of inaction or excessive delay occurring after 30 June 2024, refuse to apply this provision and decide the complaint disregarding it"

The Supreme Administrative Court's line had been known since May 2025, yet the Act of 23 January 2026 extended the provision for another year. The written admission came five months after that extension.

Provincial courts are already following

III SAB/Gd 131/26 · II SAB/Wr 108/26 · II SAB/Gl 56/26 · III SAB/Ld 30/26 · II SAB/Po 78/26 (May 2026).

Practical consequence: a complaint for inaction covering the period after 30.06.2024 now has real prospects — contrary to what, for instance, the Silesian Provincial Office's website still suggests by citing a 2023 judgment (III SAB/Gl 231/23) predating the shift in case law.

What official court statistics show

In 2025, the sixteen provincial administrative courts received **3,559 complaints** for inaction under code 6272 ("Visas, permits for fixed-term residence, for settlement, expulsion from the territory of the Republic of Poland"); **2,448 of them — 68.8%** — went to a single court, the Wrocław court, and 898 were still pending at year end.

3,579 complaints were disposed of:

Outcome	Number
upheld	432
dismissed on the merits	1,032
rejected by procedural order (no examination of the merits)	1,873
resolved otherwise	242

The share of procedural rejections rose to **52.3%**, against 32.5% in 2024 and 40.2% in 2023. All 3,579 cases were decided in closed session under the simplified procedure (art. 119 pkt 4 of the Law on Proceedings before Administrative Courts) — **not one reached an open hearing all year**.

Among the 1,464 cases decided by judgment, 29.5% of complaints were upheld (42.5% in 2024) — though in the other fifteen courts, excluding Wrocław, the figure was 45.5% against 46.3% a year earlier, that is, unchanged.

Four things that most often lose a complaint

The court statistics give the outcome but not the grounds for rejection. An indication comes from a crowd-sourced set of 803 rulings from the CBOSA case database for 2025–2026, compiled by this initiative. **The sample is not representative** — 463 of the 803 come from one court, and 777 of the 803 were issued in 2026 — so it may be read for causes, not for success rates.

It contained 314 procedural rulings (one case may have several causes): court fee unpaid — 151 · PESEL number not supplied — 88 · no *ponaglenie*, or none evidenced — 69 · no power of attorney — 47 · no address — 33 · no signature — 25 · complaint withdrawn — 26.

Hence four practical conclusions:

1. **File the *ponaglenie* first, the complaint second.** A complaint filed without a prior *ponaglenie*, or on the same day as one, is rejected as inadmissible.
2. **The 100 PLN court fee** must be paid when requested, or the court rejects the complaint without examining it.
3. **Formal defects must be cured within 7 days** of the request (PESEL, power of attorney, address, signature) — in practice this deadline cannot be restored.
4. **If the office issues its decision on the day the complaint is filed**, the case becomes moot.

Court of Justice of the EU

The scheme is also before the CJEU — case **C-254/25** (referred by the Gliwice court). The Advocate General, in an opinion of 16.04.2026 (ECLI:EU:C:2026:320), considered such provisions impermissible outside cases of force majeure. *This is an opinion, not a judgment; no judgment has yet been given.*

Sources: bip.brpo.gov.pl (Ministry letter BMP.0790.3.7.2026(6), PDF) · curia.europa.eu (C-254/25) · Supreme Administrative Court, "Sprawozdanie statystyczne z ruchu i sposobu załatwienia spraw za rok 2025. Wojewódzkie Sądy Administracyjne", Part 2, sheet "WSA SAB Symbole", rows Lp. 214 (code 627) and Lp. 217 (code 6272); file "7-skargi-na-bezczynnosc-i-przewleklosc-2025.xls", nsa.gov.pl/dokumenty/statystyki-wsa (accessed 17.08.2026).

The report covers only the sixteen provincial courts, that is, first instance — Supreme Administrative Court rulings are not included. Percentages are our own calculation; the court publishes none of them.

4. The state admits it — document by document

Promise versus admission, the same signature

9.02.2024 (reply to parliamentary question no. 794): delay "will be one of the topics of work" of the government Migration Team.

2.10.2025, to the same MP (question no. 11787): the Team "has not dealt in detail with the question of delays in proceedings."

One year and eight months between the promise and the admission. Since that promise, the average time in what is today the slowest province has grown from **481 days (2024) to 658**.

The Office for Foreigners, officially

Statement on gov.pl of 6.10.2025: the provincial governor "will not forward to the Head of the Office for Foreigners *ponaglenia* filed against inaction or excessive delay in proceedings."

Supreme Audit Office, audit P/23/069 (2024)

The share of *ponaglenia* found justified fell from **36.3% to 6.5% and finally to zero** — with the auditors stressing that the fall "did not result from improved timeliness." Irregularities in **60.1%** of the cases examined. Longest case on record: **2,700 days** (Silesian Provincial Office).

Supreme Audit Office, audit I/24/002/LWR (2025, Lower Silesian Provincial Office)

Courts awarded **12.2 million PLN** in costs against this single office for delay (2022–2024) — **99.3% of all such costs nationwide**. Around 7,800 appointment bookings outside the queuing system, including for "significant clients."

Administrative courts are drowning in complaints about official silence

In 2025, the provincial courts received **13,793 complaints** about administrative inaction — **41% more** than the year before (9,792), and nearly one in five of all cases before those courts (18.83% of intake). In Wrocław this is already **50.29% of the court's entire intake**; in Warsaw, 5,672 complaints. Those two courts take 63.4% of all such complaints in Poland.

Earlier years: 7,998 complaints in 2023, 9,792 in 2024, with the share upheld falling from 40% to 33%.

Foreigners' cases among them: **3,738 complaints, or 27.1%** of all such complaints in Poland, against 3,381 a year earlier — plus 619 inaction complaints in cases concerning the employment of foreigners (code 6337). Foreigners' cases are, moreover, **one subject category out of several dozen**, alongside construction, taxation, social assistance and all the rest.

The burden falls on the whole court system, which Polish businesses and taxpayers also use.

Sources: sejm.gov.pl (questions 794 and 11787) · gov.pl/web/udsc · nik.gov.pl (P/23/069, I/24/002/LWR, submission LWR.411.2.1.2024 and statement of 11.12.2025) · "Informacja o działalności sądów administracyjnych w 2025 roku", Sejm paper no. 2423, Table I (earlier years: papers no. 302 and 1164).

5. Why this happens: no posts were created, the money went into systems

The influx was sudden in 2022. The absence of posts over four subsequent years is a decision, not a surprise.

Staffing

The last dedicated staffing increases: **200 posts nationwide in 2020** (for provincial offices and the Office for Foreigners; a later ministry letter gives 170 for the provincial offices alone) and **180 posts** for provincial offices in connection with the Act of 17.12.2021. Since then, nothing.

Supreme Audit Office: new officials were offered **53-64% of the national average wage**, and **41% of recruitment procedures ended with nobody hired**.

The Act introducing the mandatory MOS system (Sejm paper no. 1630): the ten-year cost table in the regulatory impact assessment is filled with dashes; to provincial governors' requests for posts, the government's table of comments replies: "Comment not accepted."

The money was there — just not for people

Item	Amount
Provincial governors' "foreigner services" projects, EU asylum and migration fund 2021-2027	165.5m PLN
Central IT contracts of the Office for Foreigners (Pobyt, MOS) since 2020	approx. 60m PLN net
Servers for that infrastructure	19.4m PLN
The MOS module itself (single-source award)	1.17m PLN

The tender to modernise and maintain the whole infrastructure: one procedure, eight publications in the EU procurement journal, the bid deadline moved six times — and no award.

Amounts = contracted values from the public procurement registers and fund lists, not "expenditure" — the state does not publish that.

The same office, two speeds

Document needed by...	Average time
THE EMPLOYER — work permit	82 days
THE PERSON — residence decision	341 days

Same administration, same foreigner, same file of documents. A fourfold difference.

The state can move fast when it wants to: **846,000 PESEL UKR numbers issued in the first 28 days** (with biometrics, averaging ~30,000 a day); a national visa from a consul — 15 days by statute (art. 74a); the draft bill UD408 promises a chosen group 60 days. The same administration — only a different political will.

The counter-argument: "the sudden influx after 2022"

That explanation no longer covers a fourth year — and the court says so itself. In its judgments of 13.06.2025 (II OSK 2940/24) and 16.02.2026 (II OSK 1087/25), the Supreme Administrative Court held that public authorities "should have adapted their organisational and staffing resources to the increased number of cases" already at the time of the earlier extension, and that a further extension "may have occurred in breach of the principle of proportionality." Similarly the CJEU Advocate General in the opinion of 16.04.2026 in case C-254/25.

Inaction has a measurable price — where complaints worked

The Lower Silesian Provincial Office paid over **12 million PLN** in awarded costs for delay in 2022-2024 — 99.3% of all such costs in the country; the other 15 offices paid **80,000 PLN** combined. Article 100d reduces that liability to zero.

Workload in people, not procedures

From **189 residence applications per employee** (Subcarpathian Office) to **500** (Łódź Office) at the end of 2022; the Greater Poland Office, on its own figures, had **1,325 cases per employee** in 2022.

Conclusion: the queues are not force majeure — they are the consequence of budgetary and staffing decisions.

Sources: ministry replies to the Commissioner for Human Rights (XI.541.31.2021; Commissioner's letter of 27.09.2024) · Supreme Audit Office P/23/069 (p. 32) · Sejm paper no. 1630 · gov.pl/web/dfe-mswia/projekty-fami-2021-2027 · TED, BZP · Ministry of Family, Labour and Social Policy, "Informacja o zatrudnieniu cudzoziemców w Polsce do 31 grudnia 2025 r." ·

6. Banks — a legal shield for those waiting

No provision requires an automatic account freeze.

The anti-money-laundering act (consolidated text Dz.U. 2025 poz. 644) **never once uses the words "residence card"** (checked in the consolidated text, as of 16.08.2026) — it requires identity verification, and a valid passport establishes that (arts. 36-37). No provision requires an account to be frozen merely because a card has expired.

The Financial Intelligence Unit, Communication no. 73: refusal or termination of a relationship may not be "dictated solely by the fact that an entity belongs to a higher-risk customer group"; individual analysis is required.

The Financial Supervision Authority, in a letter to banks of 10.06.2025, established that a temporary identity certificate issued to a foreigner **is an identity document**. Refusals to open accounts are being handled by the Commissioner for Human Rights, and the question of account freezes by the Financial Supervision Authority (correspondence ZPM.540.12.2026.MB).

Residence while awaiting a decision is **lawful by operation of statute** (art. 108 ust. 1 pkt 2 of the Act on Foreigners; from 27.04.2026 the certificate carries a QR code). Every consumer lawfully present has the right to a basic payment account (art. 59ia of the Payment Services Act).

7. Borders: years of waiting mean separated families

A valid residence card together with a travel document confers the right to cross the border repeatedly without a visa (art. 242 of the Act on Foreigners) — someone awaiting a decision has no such document. The certificate of a filed application legalises residence **only "on the territory of the Republic of Poland"** (art. 108) — it confers no right of return and is not recognised in the Schengen area.

The consequence depends on your passport — and can be total

For citizens of visa-exempt states (including Ukraine, Georgia and Colombia — Annex II to Regulation 2018/1806), leaving and returning remain possible, though within the limit of 90 days in any 180-day period, which rules out longer trips and complicates counting days.

For citizens of visa-required states — **Belarus, Russia, India and several dozen others (Annex I)** — leaving means being unable to return until a new visa is obtained. There is no visa-free travel, and a national visa is issued solely by a consul, that is, by a post outside Poland.

In practice: for this group it is a ban on leaving the country for the entire waiting period — often two years or more.

A closed loop, step by step

For a citizen of a visa-required state, the situation closes on itself:

1. **During the proceedings**, the certificate legalises residence only within Poland (art. 108). Leaving means that returning requires a new visa.
2. **A national visa is issued solely by a consul** (art. 66 ust. 1), that is, by a post outside Poland. So one must first leave in order to be able to return.
3. **A positive decision does not improve the situation — it worsens it.** The catalogue of visa purposes in art. 60 of the Act on Foreigners contains no purpose of "collecting a residence card." Someone who has already been granted a permit has no legal basis to apply for a visa allowing return to collect the document — and the card is collected in person at an office in Poland.

In other words: **leaving while waiting risks the loss of any means of return, and a positive decision does not restore it.** This is not a loophole that can be worked around — it is the combined effect of three provisions in force.

Separately: Belarusian citizens have no visa-free access, and the only posts issuing Polish national visas are located on Belarusian territory — that is, in a place where, for some of them, merely travelling there carries personal risk.

The theoretical "way out" — a new visa — is closed in practice

A national visa is issued by a consul (art. 66 ust. 1; even the exceptional procedure via the foreign minister runs through a consul — ust. 1b), so **one must first leave**. The catalogue of visa purposes in art. 60 does not include "collecting a residence card."

For many groups the visa route does not exist at all:

- Poland has issued no tourist visas to **Russian** citizens since 2022, and a ministerial regulation of 19.09.2022 (Dz.U. 2022 poz. 1963) bars their entry for tourist and business purposes among others;
- **Ukrainian** men aged 23-60 who enter a country under mobilisation will, as a rule, not leave it again (an easing for those aged 18-22 has applied since 28.08.2025 — Ukrainian Cabinet resolution no. 1031);
- **Belarusians** — no visa-free access, and the need to appear in person at a consular post (see above).

The result: a parent's funeral, a sick child abroad, a sister's wedding — out of reach for years.

This is not "administrative inconvenience": being unable to visit close family for years is an interference with the **right to private and family life** (art. 8 of the European Convention on Human Rights), whose proportionality is not justified in any legislative document known to us — the impact assessments accompanying successive extensions are silent on the point.

EU Blue Card holders also lose intra-EU mobility (arts. 20-21 of Directive 2021/1883), which requires a valid card.

8. Economy and science: those waiting are taxpayers and researchers

The statutory deadline is 60 days; the average is 341. This is a service paid for and not delivered. We are not asking for help.

Economic scale

Refugees from Ukraine generate **2.7% of Polish GDP** and around **47 billion PLN in annual public revenue** from income tax, VAT, excise, corporate tax, social insurance and health contributions (Deloitte/UNHCR, 10.06.2025).

The business services association and EY (5.05.2026): "for many organisations the migration system has now become one of the key constraints on growth."

In June 2026 the number of people under temporary protection in Poland fell by **6,335**, while across the EU-27 it rose by 24,340; only 4 of 31 states recorded a fall (Eurostat, migr_asytpsm). Part of that fall is transitions to residence cards, part is departures from Poland; nobody publishes the breakdown, but the direction against the rest of the EU speaks for itself.

Taxes

The people standing in these queues pay taxes in Poland — the same taxes that fund the office failing to meet its deadlines towards them. They live here lawfully, work, file income tax returns, pay VAT and excise, and pay separately for their own application to be examined — in the Ukrainian-citizen procedure, **340 PLN in stamp duty and 100 PLN for the card, per person, including children**.

The state development bank calculated that in 2024 migrants from Ukraine paid around **15.21 billion PLN** in levies against around **2.8 billion PLN** in child benefit payments, and stated plainly: "migrants from Ukraine pay more into the Polish budget than they receive in social benefits" — more than five times more (report of 11.03.2025).

857,100 Ukrainian citizens pay social insurance contributions, while around **12,000** of them draw a pension or disability benefit (Social Insurance Institution, XII.2025).

The Interior Ministry spokesperson, Karolina Gałęcka, to the Polish Press Agency on 8.08.2026: "According to social insurance data, 95% of Ukrainian men of conscription age work legally in Poland and pay taxes normally."

Science

One in three doctoral students at Polish Academy of Sciences institutes is a foreigner — **38.1%** (449 of 1,178, RAD-on, 31.12.2025), against a national average of 13.9%. A doctoral student without a valid card can travel at most under visa-free rules of 90/180 days — if their nationality is covered at all; longer placements, archival research and EU research mobility remain out of reach.

The state is cutting its own science off from the world.

9. Equality before the law: passport, province, origin

Passport

The government's draft bill **UD408** provides for a decision within 60 days, with tacit approval if the office stays silent — but **only for citizens of states to be designated by regulation**; the explanatory memorandum gives Australia, Japan, South Korea, the USA and the UK as examples. *This is a draft, not yet law.*

For everyone else: suspended deadlines until 4.03.2027 and complaints the statute directs courts to dismiss. Differentiating pace and procedural guarantees by citizenship, written directly into the rules, requires justification — the draft offers none. Without justification this is arbitrary unequal treatment (art. 32 of the Constitution).

A systemic irony: the President has already signed an act extending tacit approval to **17 types of case** — from tax arrears to mass events (Dz.U. 2026 poz. 875, in force from 1.01.2027). Foreigners' cases are not among them; the word "foreigner" does not appear in that act once.

Province

The same statute, the same application — yet an average of **242 days in Lesser Poland and 658 in Silesia**; contact with the caseworker is possible at some offices and impossible at others. The Constitution (art. 32) guarantees equal treatment by public authorities, and the Code of Administrative Procedure (art. 10) guarantees the party's active participation.

A postcode cannot determine a person's rights.

Outside the special act, but under its provision

The act is called "on assistance to Ukrainian citizens," yet Article 100d suspends deadlines for **all foreigners** — including those the act does not touch by any other provision.

This covers Ukrainian citizens who arrived before 2022 or live here on an ordinary permit without a PESEL UKR number, and equally citizens of Belarus, Georgia, India or Colombia. Neither the lawfulness of residence conferred by the special act nor any assistance programme applies to them; they pay taxes and contributions under general rules — and wait in the same queue, only without any cushion.

Scale: Ukrainian citizens make up 66.9% of insured foreigners (Social Insurance Institution, III.2026). The remaining third are people to whom the state has applied a provision from an act about a war that does not concern them, and from an assistance programme they have never used.

This group disappears from public debate: they are not "refugees," so nobody speaks about them, while the provision affects

them in exactly the same way.

Origin protects no one

Article 100d also freezes deadlines for **people of Polish descent holding a Pole's Card** who apply for permanent residence (art. 195 ust. 1 pkt 9) — people who have declared their belonging to the Polish Nation and are returning to the country. The original statutory deadline for permanent residence was 3 months (art. 210 of the 2013 Act); today it is 6 months — except that this deadline does not run until 4.03.2027.

The system does not distinguish "ours" from "theirs" — it grinds everyone.

10. Safety: facts instead of fears

The law provides no sanction whatsoever for peaceful participation in a lawful assembly.

Freedom of peaceful assembly belongs to "everyone" (art. 57 of the Constitution), not only to citizens (art. 37(1)). The Law on Assemblies knows no list or registration of participants — the notification contains only the organiser's and chairperson's details (art. 10).

Peaceful participation in a lawful assembly is not an offence and does not appear among the statutory grounds for:

- refusing recognition as a Polish citizen (art. 31 of the Citizenship Act);
- refusing or withdrawing a residence permit (arts. 100–101 of the Act on Foreigners);
- a return decision (art. 302 of the Act on Foreigners).

Only one's own acts are punishable (art. 52 of the Code of Petty Offences); state security clauses concern real threats — the peaceful exercise of a constitutional freedom is not one. The Supreme Administrative Court has held with final effect that even repeated traffic fines are not automatically sufficient to refuse citizenship (II OSK 81/24, 22.04.2026).

Note: the above concerns recognition as a Polish citizen, which is decided by a provincial governor and is subject to appeal. The conferral of citizenship by the President is a prerogative with no statutory criteria, no statement of reasons and no appeal — in that procedure no ground can be identified, either for or against.

"Faster" does not mean "less vetting"

Consultations with the security services (Border Guard, Police, Internal Security Agency) have statutory deadlines of **30/60 days**, with deemed consent where no objection is raised (arts. 109 and 207 of the Act on Foreigners), and declarations of no criminal record form part of the application in the MOS system.

It is not the checks that create 658 days — the Supreme Audit Office documented administrative inaction of 92–779 days, including 15–448 days before anyone took the first step.

We demand fast decisions after vetting, not the abandonment of vetting. A long procedure protects nobody: throughout its duration the applicant is lawfully present in the country in any event.

11. Warning — common errors in circulation

Let us not shoot ourselves in the foot.

"Half as many decisions are being issued" — untrue. Office for Foreigners data: positive temporary residence decisions numbered 334,000 (2023), 310,000 (2024), 328,000 (2025), and 190,900 in the first half of 2026 alone (all residence decisions: 233,500) — a record pace. Only permanent residence is falling (–35% since 2023, some 3–4% of volume). **The real problem: a record number of decisions and still 658 days of waiting — the system is structurally overwhelmed, not "lazy."**

Assemblies: notification under the ordinary procedure is 30–6 days before the date (art. 7 of the Law on Assemblies), under the simplified procedure 30–2 days (art. 22); "3 days" is wrong. A foreigner may also be an organiser; the statute does not require a PESEL number.

Amnesty's analysis "Permanent temporariness" (04.08.2025) concerns Belarusians' travel documents, not residence cards generally; Andrzej Poczobut did not "endorse" it — it is Amnesty that calls for his release.

"There are no problems in Poznań, Łódź and Kielce" — untrue: 339, 386 and 325 days on average.

A provincial governor is appointed by the Prime Minister (art. 6 of the Act on the Provincial Governor), not by parliament; the higher authority in residence matters is the Head of the Office for Foreigners (art. 22 ust. 2 of the Act on Foreigners).

Glossary

ABSL	Association of Business Service Leaders
ABW	Internal Security Agency
AML	anti-money laundering
BGK	Bank Gospodarstwa Krajowego, the state development bank
BZP	Public Procurement Bulletin
CBOSA	Central Database of Administrative Court Rulings
Dz.U.	Dziennik Ustaw, the Journal of Laws
ECHR	European Convention on Human Rights
FAMI	EU Asylum, Migration and Integration Fund
GIIF	General Inspector of Financial Information
KPA	Code of Administrative Procedure
MOS	Moduł Obsługi Spraw, the case-handling system
MSWiA	Ministry of the Interior and Administration
NIK	Supreme Audit Office
NSA	Supreme Administrative Court
OSR	regulatory impact assessment
PAN	Polish Academy of Sciences
RPO	Commissioner for Human Rights
TED	Tenders Electronic Daily, the EU procurement journal
TSUE	Court of Justice of the European Union
UdSC	Office for Foreigners
UKNF	Polish Financial Supervision Authority
WSA	provincial administrative court
ZUS	Social Insurance Institution

How to verify these sources yourself

No technical skills required.

Replies to parliamentary questions (nos. 794, 11787, 12584, 18089): sejm.gov.pl/sejm10.nsf/interpelacja.xsp?typ=int&nr=18089 — simply change the number at the end of the address; the reply is in the attached PDF.

Statutes and amendments (Journal of Laws): dziennikustaw.gov.pl/DU/2026/203 — year and item from our footnotes. The address api.sejm.gov.pl/eli/acts/DU/2025/337/text.pdf also opens in a browser as an ordinary PDF, despite the word "api."

Administrative court judgments (e.g. II OSK 2921/24): orzeczenia.nsa.gov.pl/cbo/query — enter the case reference in the search box.

Office for Foreigners statistics: gov.pl/web/udsc/zestawienia-roczne — XLSX files with decision counts by year and province.

Commissioner's letters and ministry replies (e.g. XI.541.119.2025, BMP.0790.3.7.2026(6)): bip.brpo.gov.pl — search by reference number.

Supreme Audit Office audits (P/23/069, I/24/002/LWR): nik.gov.pl — search by audit number.

Eurostat data: ec.europa.eu/eurostat/databrowser — dataset code `migr_asytspm`.

Compiled collaboratively from public sources only: the Journal of Laws via api.sejm.gov.pl, official bulletins, the Supreme Audit Office, the Commissioner for Human Rights, the administrative courts, EU and Polish procurement registers, Eurostat, RAD-on and industry reports. **Free to copy, print and quote without asking.**

A companion media kit is available at glos-migranta.eu · community chat: t.me/glosmigranta — including the calculation of some 392,000 cases beyond the offices' decision-making capacity (2022–2025), derived from the Office for Foreigners' annual datasets.

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