

## **Re: AMIF in Poland: residence procedures of 236-647 days and no result indicator that measures them**

Dear Secretariat,

further to my message of 11 September 2026, I am writing once more because documents released since then make the point narrower, and because one of them fixes a date by which it can still be acted upon.

1. The programme reporting. On 15 and 16 September the Polish Managing Authority disclosed the four annual performance reports for programme CCI 2021PL65AMPR001 submitted under Article 35 of Regulation (EU) 2021/1147, covering January 2021 to June 2025; the latest was approved by the monitoring committee on 16 February 2026. I read all four in full. None contains a single figure, indicator or sentence on how long residence procedures take. The 2024/2025 report states that support was directed "primarily to the Office for Foreigners, the Border Guard and the voivodeship offices, in order to strengthen their capacity".

2. The supervising ministry. On 16 September the same Ministry replied in writing that it "does not possess periodic reports, compilations or statistical information taking into account the timeliness of residence legalisation proceedings"; that it requested no explanations from any voivode on the duration of such proceedings in 2024-2026; that it carried out no inspection or audit of the voivodeship offices in this field since 2024; and that no organisational unit within it is designated to monitor that timeliness.

3. The projects themselves. The indicator sheets of all sixteen projects of the 2024 call for voivodeship offices, released by the intermediate body on 2 September, show that in every one of the sixteen the sole mandatory indicator is named "Nie dotyczy" ("not applicable") with a target of 0.0000. Thirteen projects declare no result indicator at all. The largest, "Cudzoziemiec na Mazowszu" of the Masovian Voivode (PLN 39,540,000, of which PLN 29,655,000 from AMIF), declares exactly one, named "brak możliwości usunięcia" - "cannot be deleted" - with a baseline of 0.0000, a target of 0.0000 and "employment contracts" as its method of measurement. The same project's summary opens with the sentence that "the main problem of third-country nationals in the residence legalisation procedure in Masovia is the long waiting time for a residence card" and promises IT functionalities "shortening the duration of the legalisation procedure". No result in it is expressed in time.

4. The number exists and is already used - to distribute money. The rules of the 2026 call for voivodeship offices (PLN 112,999,000) state that the allocation was divided by a fixed sum per region and five keys, the fifth being "the average duration of proceedings in the voivodeship office". The Managing Authority therefore holds this figure for each office and uses it to decide how much each receives, while requiring no indicator on it from any of them.

5. Money committed this year. The Office for Foreigners' application 0143/25, lodged on 20 February 2026 under the direct call FAMI.02.01-IZ.00-002/25, with a financing agreement signed on 14 April 2026, lists as its mandatory output indicator "Nie dotyczy (produkt)" with a target of 0.0000, and one indicator of its own: eighteen information Saturdays, to be measured by "payment requests".

6. Two clocks. The 135 payment requests of the sixteen 2024 projects were all approved, none rejected, in a median of 27 days from submission, with no statutory deadline governing that step. The applicant on the other side of the same offices has a statutory limit of 60 days and, in 2026, actual averages of 236 to 647 days.

Taken together these documents describe one thing: the figure that measures the outcome is precise enough to divide the money between sixteen regions, and absent from every level of reporting on what the money achieved - the project indicator, the final report, and the annual report to the Commission.

The legal lever. Annexes V and VIII to Regulation (EU) 2021/1147 contain, for every specific objective, no indicator of the duration of any procedure; all count persons, places, items or projects. Article 33(5) empowers the Commission to adopt delegated acts amending Annex VIII "in order to review or complement those indicators". Under Article 37(2) that power is conferred only until 31 December 2027, and under the last sentence of Article 33(5) any amendment applies solely to projects selected after its entry into force. Whatever is not added by that date will not apply to this programming period at all.

In my message of 11 September I referred to Recommendation 4 of the Court of Auditors' Special Report 26/2024, under which the Commission is to analyse by the end of 2026 how to improve the reporting framework. My request is confined to what the Secretariat can do: that this note be kept on file with the earlier one, and that, when the Commission reports on that recommendation, the question be put whether a duration indicator for residence procedures will be added to Annex VIII under Article 33(5) while the power to do so still exists.

Attached is the single document behind point 3, as released by the Polish intermediate body on 2 September 2026: the indicator record of project FAMI.02.01-IZ.00-0013/24, in which the sole result indicator is the one named "brak możliwości usunięcia" - "cannot be deleted". The remaining documents cited above are available on request.

Yours faithfully,  
[imię i nazwisko usunięte]