FACTS AND SOURCES

Delays in residence legalisation in Poland

As of 5 November 2026 · version 6.2 · glos-migranta.eu

Free to use: posters, posts, conversations with the press. Every section ends with public sources. Language versions: PL / EN.

Polish statute names, article numbers, case references and the names of offices are kept in the original - that is how they are searched for in official databases. Quotations from Polish documents are our translations; the Polish originals are in the Polish version of this page and in the linked documents. A ponaglenie is a formal reminder filed with the higher authority when an office has not decided a case on time; it is the step that must come before a court complaint about inaction.

Five numbers, if you read nothing else

Statutory deadline for a residence decision	**60 days**
Average time taken (Ministry of the Interior, October 2025)	**341 days**
Voivodeships where the time is longer than in 2023	**15 of 16**
Complaints about inaction upheld by judgment: 2020 versus 2025	**94.5% → 29.5%**
Indicators in the 16 FAMI projects from 2024 that measure the time to handle a case	**0 of 138**

Contents

1. Statutory deadlines versus reality
2. Article 100d - what it actually does, and how it was extended
3. The courts refuse to apply it - and the government extended it anyway
4. The state admits it - document by document
5. Why this happens: no decision-making posts were created, the money went into systems
6. How the offices answer questions about their own deadlines
7. Banks - a legal shield for those waiting
8. Borders: years of waiting mean separated families
9. Economy and science: those waiting are taxpayers and researchers
10. Equality before the law: passport, voivodeship, origin
11. Safety: facts instead of fears
12. Winding down the special act: three clocks, one date and a question without an answer
13. Warning - common errors in circulation
14. Where the documents are

Glossary · How to verify these sources yourself

1. Statutory deadlines versus reality

The law gives the voivode 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 Ministry of the Interior and Administration's own figures (MSWiA; reply to parliamentary question no. 12584, as of 13.10.2025), the average temporary residence and work case takes **341 days**, with **463,487 cases pending** - in that single category alone.

The average time by voivodeship (MSWiA table from the reply to question no. 18089, as of 6.07.2026, in days) is in the table below. Even the fastest voivodeship exceeds the statutory deadline **fourfold**. Breakdown of 26,877 decisions by the Masovian voivodeship office (UW): 3% took **more than 24 months** (738 cases), 9% took 18-24 months, 29% took 12-18 months. **No voivodeship in the MSWiA table meets the statutory**

deadline. A methodological caveat: the published averages describe the time of the **administrative procedure** - MSWiA does not explain from which event (receipt of the application by the office, registration of the case in the system, formal opening of the procedure) the system counts it. The applicant's whole journey - from filing, through waiting to give fingerprints, to collecting the card - is by construction longer than any of these averages. Nor is this time "on the applicants' side": the Supreme Audit Office (NIK) documented inaction by the Łódź voivodeship office of 111 to 779 days (all 51 of the 68 cases examined were past the deadline), and in the Kujawsko-Pomorskie voivodeship office periods without any action of 92 to 249 days and a first step in the case only 15-448 days after the application was filed (P/23/069).

The picture across sixteen offices. In **15 of 16** voivodeships the average time of a temporary residence procedure is longer in 2026 than in 2023; the law gives 60 days for a decision. In the full MSWiA table of 27.07.2026 (as of 6.07.2026) the range is **from 242 to 658 days**: the longest wait is in the voivodeships of Śląskie (658), Pomorskie (598) and Lubuskie (555), the shortest in Małopolskie (242), Warmińsko-Mazurskie (273) and Podkarpackie (302). For the state as of 12.08.2026 the Office for Foreigners (UdSC) gave values differing by 1 to 18 days, with the same three at both ends: 668, 610 and 537, and 244, 271 and 305. The biggest increase in days since 2023 was in Pomorskie (+284), Podlaskie (+263) and Mazowieckie (+241, or +158%); the smallest in Wielkopolskie (+10) and Zachodniopomorskie (+13); the only voivodeship where the time shortened is Dolnośląskie (from 401 to 303 days, -98).

Pending cases. According to UdSC, the sum of the sixteen voivodeships for temporary residence cases is rising: **387,312** (end of 2023), **646,232** (end of 2025), **803,223** (1.07.2026; our own sum). The most cases on 1.07.2026 are in Mazowieckie (202,187), Pomorskie (92,054) and Śląskie (86,059); the fastest growth was in Podlaskie (from 4,805 to 21,208, more than 4 times). This is a different scope from the 463,487 cases in the MSWiA reply (temporary residence and work) - not one series. A caveat: in 2026 UdSC's figures are growing faster than would follow from the inflow and the number of decisions, which may indicate a change in how cases are counted (the MOS system, CUKR cards) - the direction is certain, not the scale. Offices report their own figures: Łódzkie 49,844 in August 2026 versus 47,194 in UdSC data as of 1.07.

Staff do not grow with the caseload. Łódź voivodeship office: pending 27,179 (end of 2023), 27,016, 33,979 and 49,844 (August 2026); staff handling the procedures 37, 38, 36 and 38. In Mazowieckie 270 posts deal with residence legalisation (MSWiA, reply to question no. 18089).

A note on the measure: the average covers only closed cases, including discontinuations and cases left without examination, counted by the date the decision was issued (Voivode of Łódź, SOC-IV.1331.11.2026 of 18.09.2026). Those still waiting are not yet included in the average.

Voivodeship	Time 2023 (days)	Time 2026 (days)	Change	Pending 1.07.2026	Complaints to the WSA 2025
Dolnośląskie	401	303	-98 days (-24%)	56 687	2 448
Kujawsko-pomorskie	464	541	+77 days (+17%)	23 517	12
Lubelskie	211	386	+175 days (+83%)	17 177	4
Lubuskie	398	555	+157 days (+39%)	36 772	20
Łódzkie	336	386	+50 days (+15%)	47 194	17
Małopolskie	128	242	+114 days (+89%)	49 772	8
Mazowieckie	153	394	+241 days (+158%)	202 187	497
Opolskie	425	510	+85 days (+20%)	22 179	19

Voivodeship	Time 2023 (days)	Time 2026 (days)	Change	Pending 1.07.2026	Complaints to the WSA 2025
Podkarpackie	135	302	+167 days (+124%)	11 420	2
Podlaskie	184	447	+263 days (+143%)	21 208	11
Pomorskie	314	598	+284 days (+90%)	92 054	275
Śląskie	427	658	+231 days (+54%)	86 059	111
Świętokrzyskie	172	325	+153 days (+89%)	6 296	0
Warmińsko-mazurskie	134	273	+139 days (+104%)	9 365	0
Wielkopolskie	329	339	+10 days (+3%)	74 752	110
Zachodniopomorskie	452	465	+13 days (+3%)	46 584	25

Time: MSWiA, reply to question no. 18089 (as of 6.07.2026). Pending: UdSC, temporary residence. Complaints: symbol 6272, the court competent for the voivodeship, year 2025 (NSA statistics); in Świętokrzyskie and Warmińsko-Mazurskie 0.

The queue month by month. According to a spreadsheet of the Office for Foreigners of 28.10.2026, 310,530 foreigners were in temporary-residence proceedings on 1.01.2024 and 611,257 on 1.08.2026, almost twice as many. From January 2024 to August 2026, 1,319,841 applications were filed and first-instance authorities issued 1,050,407 rulings. (data (glos-migranta.eu/dane))

Sources: sejm.gov.pl, questions 12584 and 18089 (api.sejm.gov.pl/sejm/term10/interpellations/18089) · UdSC, BSZ.WAiSM.0361.16.2026/DH of 28.08.2026 (glos-migranta.eu/dokumenty/udsc-bsz-waism-0361-16-2026-08-28.pdf) · Voivode of Łódź, SOC-III.1331.2.2026 (glos-migranta.eu/dokumenty/lodzki-soc-iii-1331-2-2026-08-25.pdf) and SOC-IV.1331.11.2026 (glos-migranta.eu/dokumenty/lodzki-soc-iv-1331-11-2026-09-18.pdf) · the sixteen offices compared: Sixteen offices in numbers (glos-migranta.eu/raporty/szesnascie-urzedow-w-liczbach)

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

Article 100d of the Act on Assistance to Ukrainian Citizens does not "prohibit" filing a ponaglenie or a complaint about inaction - it renders them **ineffective**: the running of deadlines for deciding them "does not begin, and if begun is suspended" (para. 1), the provisions on administrative inaction are disapplied (para. 3(1)) - including art. 36 of the Code of Administrative Procedure (KPA), 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)), and the delay "cannot be a basis for invoking legal remedies" (para. 4). Scope: temporary residence, permanent residence and EU long-term resident permits before a voivode - for **every foreigner**, not only Ukrainian citizens. **It does not cover citizenship** (confirmed by the Commissioner for Human Rights, RPO, submission XI.541.119.2025 of 24.10.2025).

The calendar of "temporariness": the suspension has run **without interruption since 1.01.2023** and has been extended **six times** (31.12.2022 → 4.03.2027), as a rule just before expiry (the last two extensions came 1 day and 8 days before the deadline): to 24.08.2023 (Dz.U. - Journal of Laws - 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 (to 4.03.2027).

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

The safety valve disconnected. In June 2022 UdSC asked the voivodes to stop passing ponaglenia (urging complaints) on to it, "for the moment until 31 December 2022". It is now in its fifth year: 1,222 found justified in 2022, 175 in 2023-2026 and 24,341 left unexamined. (Do not pass on ponaglenia (glos-migranta.eu/raporty/ponaglenia-bez-rozpatrzenia))

Sources: api.sejm.gov.pl/eli/acts/DU/2025/337/text.pdf (pp. 99-100) · subsequent Dz.U. as above (api.sejm.gov.pl/eli) · the extensions compared: A ponaglenie that nobody examines (glos-migranta.eu/raporty/ponaglenie)

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

- **NSA (Supreme Administrative Court), judgment II OSK 2921/24 (19.05.2025):** the 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 RPO, ref. BMP.0790.3.7.2026(6), June 2026, verbatim in translation: "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 ministry admits in writing that it maintains a provision its own courts will not apply - the NSA line had been known since May 2025, yet the Act of 23.01.2026 extended the provision for another year; the written admission came five months after that extension.
- **The other half of the same admission: the administrative remedy cannot work.** In the same letter the ministry explains that while a court may refuse to apply art. 100d, the Head of the Office for Foreigners, as the authority deciding ponaglenia against voivodes, "is still obliged to apply the provision of art. 100d of the special act". The consequence, in the ministry's own words: a ponaglenie - the statutory remedy that must come before a court - by construction cannot produce a decision; only a complaint to a court that will disregard the provision works.
- The line of the voivodeship administrative courts (WSA) already follows the NSA: III SAB/Gd 131/26, II SAB/Wr 108/26, II SAB/Gl 56/26, III SAB/Łd 30/26, II SAB/Po 78/26 (May 2026).
- **Practical consequence for those waiting:** a complaint about inaction covering the period **after 30.06.2024** has real prospects today - contrary to what, for example, the Silesian voivodeship office's webpage suggests, still citing a 2023 judgment (III SAB/Gl 231/23), from before the NSA's landmark line.
- **What the official court statistics show.** In 2025 the sixteen voivodeship administrative courts received **3,559 complaints** about inaction under symbol 6272, described in the report as "Visas, temporary residence permits, settlement, expulsion from the territory of the Republic of Poland"; **2,448 of them - 68.8% (our calculation) - went to a single court, the WSA in Wrocław**, and 898 were awaiting a decision at the end of the year. 3,579 complaints were resolved: **432 were upheld, 1,032 dismissed, 1,873 rejected by order - without examining the merits of the allegation - and 242 resolved in another way.** The share of rejections rose to **52.3% of resolved cases** against 32.5% in 2024 and 40.2% in 2023 (our calculations). **All 3,579 cases were decided in closed session under the simplified procedure (art. 119(4) of the Law on Proceedings before Administrative Courts) - in the whole year not one went to a hearing.** Of the 1,464 cases decided by judgment, 29.5% of complaints were upheld (our calculation; 42.5% in 2024) - and **in the other fifteen courts, excluding Wrocław, it was 45.5% against 46.3% a year earlier, i.e. unchanged**. Rejection happens on formal grounds that most often **do not burden the office**; it is not an assessment of the merits of the allegation of delay.
- **Official NSA statistics 2020-2025: fewer and fewer wins, more and more rejections.** Complaints about inaction in residence cases (symbol 6272) received by the voivodeship administrative courts: **4,329** in 2020, **11,104** in 2021, **2,303** in 2023, **3,559** in 2025. Among complaints decided by judgment, the courts upheld **94.5% in 2020 and 29.5% in 2025** (our calculation from NSA files). From the 2025 cohort: 432 upheld, 1,032 dismissed, 1,873 rejected. **The result depends on the court.** In 2025 complaints were upheld in

Gdańsk in **94.3%** of cases decided by judgment (100 of 106), in Wrocław in **24.0%** (262 of 1,090), in Poznań in **16.7%** (14 of 84). Rejections among all resolved cases: Warszawa 71.0% (186 of 262), Wrocław 53.9%, Gdańsk 44.5%, Gliwice 36.8%, Poznań 15.1% (percentages are given only for courts with at least 50 cases). Wrocław alone receives 68.8% of all such complaints in the country; in the other 15 courts upheld complaints are 45.5%. **Complaints grow where the queues are:** the WSA in Warszawa received 253 complaints in 2024, 491 in 2025 and 2,008 in 2026 to 13 August (court reply); the WSA in Gdańsk 399 from 1.01 to 18.08.2026 (275 in the whole of 2025), of which in that period 169 were upheld, 2 dismissed, 59 rejected - partial data from the court's reply, not from the annual NSA statistics. The Lower Silesian voivodeship office reported 2,590 complaints in 2024, 2,437 in 2025 and 1,770 in 2026 up to the date of its reply.

- **Before you go to court - four things on which complaints are most often lost.** NSA statistics give the way a complaint was resolved, but **do not give the reasons for rejections** - the report does not say how many times each ground was applied. A guide is the community collection of 803 rulings from CBOSA (the Central Database of Administrative Court Rulings) from 2025-2026, assembled by the initiative; **an unrepresentative sample - 463 of the 803 cases come from one court, and 777 of the 803 rulings were issued in 2026**, so the reasons can be read from it, not the effectiveness of complaints. It contains 314 procedural decisions (one case may have several reasons): unpaid court fee - **151**, missing PESEL number - **88**, no or unproven ponaglenie - **69**, missing power of attorney - **47**, missing address - **33**, missing signature - **25**, withdrawal of the complaint - **26**. Hence four practical conclusions: (1) **ponaglenie first, complaint afterwards** - a complaint filed without a prior ponaglenie, or on the same day, is rejected as inadmissible; (2) the **court fee of 100 zł** (§ 2(1)(6) of the Council of Ministers' regulation of 16.12.2003 on the amount and detailed rules of collecting the fee) must be paid after being summoned, otherwise the court rejects the complaint without examining it; (3) **formal defects are cured within 7 days** of the summons (PESEL, power of attorney, address, signature) - in practice the deadline cannot be restored; (4) if the office issues a decision on the day the complaint is filed, the case becomes moot. The scale is already given by official statistics: **52.3% of complaints resolved in 2025 under symbol 6272 are rejections by order**, i.e. cases closed without examining the merits.
- The construction is also being examined by the **Court of Justice of the EU (CJEU) - case C-254/25** (a question from the WSA in Gliwice); the Advocate General in an opinion of 16.04.2026 (ECLI:EU:C:2026:320) held such provisions inadmissible outside cases of force majeure (this is an opinion, not a judgment; as of 6.09.2026 there was no judgment in the case).

The inflow and the share of complaints upheld, 2020-2025 (NSA statistics, symbol 6272):

Year	Complaints about inaction received (symbol 6272)	Upheld among those decided by judgment
2020	4 329	**94.5%**
2021	11 104	not given
2023	2 303	not given
2024	not given	42.5%
2025	3 559	**29.5%**

The result depends on the court (2025; percentages only for courts with at least 50 cases):

Court (2025)	Upheld by judgment	Rejections among resolved cases
Gdańsk	**94.3%** (100 of 106)	44.5%
Wrocław	24.0% (262 of 1 090)	53.9%
Poznań	16.7% (14 of 84)	15.1%
Warszawa	not given	71.0% (186 of 262)
Gliwice	not given	36.8%

Sources: MSWiA letter BMP.0790.3.7.2026(6) of 29.06.2026 - published in full on the RPO case page (bip.brpo.gov.pl, case XI.541.22.2025.DB); NSA judgments: orzeczenia.nsa.gov.pl/doc/3F40EB79FC (II OSK 2940/24), /doc/9EC3E17ED3 (II OSK 1087/25), /doc/CF4F3C2B4F (II OSK 2921/24) · curia.europa.eu (C-254/25) · court data: NSA, "Statistical report on the movement and resolution of cases for 2025. Voivodeship Administrative Courts", Part 2, sheet "WSA SAB Symbole", rows Lp. 214 (symbol 627) and Lp. 217 (symbol 6272); WSA statistics 2020-2025, Part 2, symbol 6272: https://www.nsa.gov.pl/dokumenty/statystyki-wsa/ · replies of courts and offices: glos-migranta.eu/dokumenty/wsa-warszawa-wis-0481-180-26-2026-08-25.pdf, glos-migranta.eu/dokumenty/wsa-gdansk-iv-050-60-26-dzial-2-2026.xlsx · compared: Sixteen offices in numbers (glos-migranta.eu/raporty/szesnascie-urzedow-w-liczbach) · 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 WSAs, i.e. the first instance - NSA rulings are not in it; the percentages are our own calculation, the NSA does not publish any of them.

4. The state admits it - document by document

- **Promise versus admission, the same signature.** 9.02.2024 (reply to question no. 794): delay "will be one of the topics of the work" of the government's Migration Team. 2.10.2025, to the same MP (question no. 11787): the Team "**did not deal** in detail with the issue of delays in procedures". A year and eight months between the promise and the admission; since that promise the average time in today's slowest voivodeship (Śląskie) has grown from 481 days (2024) to 658 (both figures: MSWiA table, reply to question no. 18089, as of 6.07.2026).
- **The Office for Foreigners (UdSC) officially** (gov.pl, announcement of 6.10.2025): the voivode "will not forward to the Head of the Office for Foreigners ponaglenia filed for inaction or for excessively long proceedings".
- **The ponaglenie in practice (offices' replies to public information requests, August 2026):** Łódzkie - in cases covered by art. 100d ponaglenia "were left without consideration"; Kujawsko-Pomorskie - "are left without consideration", and the office "has no document on which it bases this practice"; Lubuskie - "all incoming ponaglenia are left without consideration" (it attached a ready-made form of notification with a dotted space for the date); Wielkopolskie and Opolskie - the same. In the Łódź voivodeship office in 2022, **263 ponaglenia** were received and **255 decisions on the merits** issued, 24 of them in favour of foreigners; in 2025 there were **132** ponaglenia and **one** decision on the merits. UdSC writes in the description of its own project that from January to September 2024 the Pobyt system registered 10,703 ponaglenia at first instance and 1,089 at second instance, and **326** rulings in ponaglenie cases were issued (fewer than three per hundred - our calculation). The Lower Silesian voivodeship office received **5,935 ponaglenia** in 2025 alone (court complaints - 2,437). The Voivode of Lower Silesia: "in the years 2024 - 2026 this provision is cited in all replies to such complaints" - with 6,797 complaints in that period. (Sources and full quotations: A ponaglenie that nobody examines (glos-migranta.eu/raporty/ponaglenie))
- **Ministry supervision - in writing.** MSWiA, asked about supervising the timeliness of legalisation procedures: "In 2024-2026 MSWiA did not take supervisory action towards the voivodes in the requested scope"; earlier: "No organisational unit has been designated in MSWiA to monitor the timeliness of legalisation procedures conducted by the voivodes" (DBiSO-WODO.06770.2.91.2026.EJ of 2.10.2026, Ad. 1; glos-migranta.eu/dokumenty/mswia-dbiso-wodo-06770-2-91-2026-ej-2026-10-02-odpowiedz.pdf).
- **NIK (Supreme Audit Office; audit P/23/069, 2024):** the share of ponaglenia recognised as justified fell from 36.3% to 6.5% and finally to **zero** - NIK stresses that the fall "did not result, however, from an improvement in the timeliness of handling cases"; irregularities in **60.1%** of the cases examined; a record procedure: **2.7 thousand days** (Silesian voivodeship office).
- **NIK (I/24/002/LWR, 2025, Lower Silesian voivodeship office):** the courts awarded against this one office **PLN 12.2 million** in costs for delay (2022-2024) - **99.3%** of such costs in the whole country; at least **7.8 thousand reservations outside the queue system**, including for "important clients".
- **The voivodeship administrative courts are drowning in complaints about the silence of offices** ("Information on the activity of administrative courts in 2025", Sejm paper no. 2423, Table I): in 2025 the

voivodeship courts received **13,793 complaints about inaction of authorities** - **41% more than a year earlier** (9,792) and almost every fifth case in those courts (18.83% of the inflow). In **Wrocław it is already 50.29% of the whole inflow of the court** - more than half; in **Warszawa 5,672** complaints. These two courts receive **63.4% of all such complaints in Poland**. Earlier years for comparison (papers no. 302 and 1164): 7,998 complaints in 2023, 9,792 in 2024, with the share upheld falling from 40% to 33%. In Warszawa, where the court's report separates foreigners' cases, these complaints **doubled in a year** (150→325 in 2024). The WSA statistical report allows us to say what part of this concerns foreigners: **3,738 complaints, i.e. 27.1% of all such complaints in Poland** (our calculation), against 3,381 a year earlier - plus **619 complaints** about inaction in cases of employing foreigners (symbol 6337). Foreigners' cases are, moreover, one subject category out of several dozen, alongside construction, taxes, social assistance and all the rest. **The collapse of legalisation clogs the voivodeship administrative courts: every second complaint in Wrocław is already about inaction of authorities - and that a considerable part relates to legalisation is shown indirectly by NIK data: 99.3% of costs awarded nationwide for delay fall on the Lower Silesian office. The burden is borne by the whole judiciary, which Polish businesses and taxpayers also use.**

- **NIK, audit P/25/028 "State action in the area of migration" (post-audit statement for the Łódź voivodeship office, ref. LLO.410.19.1.2025 of 23.12.2025, published in the office's BIP):** in the office "proper conditions for efficient and timely service of foreigners were not ensured"; the first steps were taken **45-228 days** after receipt of the application, decisions were issued after **134-470 days** (42 of 52 cases examined contrary to art. 12 § 1 KPA); the backlog exceeded **32 thousand cases** at the end of 2024 and **nearly 38.2 thousand** in mid-2025, and at the end of November 2025 applications filed in April were waiting for the correction of defects - **over 15 thousand people**. NIK also noted that the conclusions of its earlier audits of 2018 and 2023 "remain relevant all the time", and pointed to the need to "initiate action at the central level (...) allowing the relief of voivodeship offices". **The Voivode of Łódź himself in his explanations: "This problem does not concern only the Łódź department (...), but is a systemic problem of all voivodeship offices and concerns the whole country".**

- **Nobody counts.** MSWiA, 30.10.2026 (DBiSO-WODO.06770.2.103.2026.EJ): „długi okres oczekiwania na załatwienie spraw wynika z trudnej sytuacji kadrowej wydziałów spraw cudzoziemców, która jest faktem powszechnie znanym” (the long wait results from the difficult staffing situation of the foreigners' departments, which is common knowledge); the same letter reports no work on Article 100d after 4.03.2027 and no systemic staffing analyses. In the documents we received, at no level does anyone count what this machine costs and what it gives. We can count only paper: 137 barrier letters from the sixteen voivodes, 525 pages, against 174 pages of letters with data. (What does a refusal cost? (glos-migranta.eu/raporty/ile-kosztuje-odmowa), The state in a loop (glos-migranta.eu/raporty/panstwo-w-petli))

Sources: interpellations 794, 11787, 18089 (api.sejm.gov.pl) · gov.pl/web/udsc (announcement of 6.10.2025) · NIK P/23/069, I/24/002/LWR, P/25/028 (nik.gov.pl; BIP of the Łódź voivodeship office) · "Information on the activity of administrative courts in 2025", Sejm paper no. 2423 · A ponaglenie that nobody examines (glos-migranta.eu/raporty/ponaglenie)

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

- The last dedicated staffing reinforcements: **200 posts** for the whole country in 2020 (for voivodeship offices and UdSC; a later MSWiA letter gives 170 for the voivodeship offices alone) and **180 posts** for voivodeship offices in connection with the Act of 17.12.2021 (MSWiA replies to the RPO, XI.541.31.2021). Since then - no new dedicated decision-making posts. NIK: new officials were offered **53-64% of the national average salary**, and **41% of recruitments** ended without hiring anyone.
- The Act on the mandatory MOS system (Moduł Obsługi Spraw, the case-handling system through which applications are filed today; paper no. 1630): the 10-year cost table in the regulatory impact assessment (OSR) filled in with **dashes only**; to the voivodes' requests for posts the government's table of comments replies: "**The comment was not taken into account**".

- **There was money - just not for decision-making posts.** For the voivodes' "foreigners' services" projects from the EU Asylum, Migration and Integration Fund (FAMI) 2021-2027 alone, **PLN 165.5 million** has been contracted (public list of projects, as of August 2026: gov.pl/web/dfe-mswia/projekty-fami-2021-2027; the later COPE lists of MSWiA - below - give a higher sum), and the central IT contracts of UdSC (Pobyt, MOS) since 2020 come to about **PLN 60 million net**. The MOS module itself was ordered **directly, without a tender, for PLN 1.17 million**, whereas the servers for this infrastructure (serving, among others, MOS and the Pobyt system) cost **PLN 19.4 million**. The tender for the modernisation and maintenance of this whole infrastructure: one procedure, **eight publications in TED (Tenders Electronic Daily, the EU procurement journal), the offer deadline moved six times - and no award**. (The amounts are contracted values from the public registers TED and BZP (Public Procurement Bulletin) and from FAMI lists, not "expenditure" - the state does not publish that.)
- **Update from the ministry's reply to the RPO (August 2026):** MSWiA says that in 2024 **16 financing agreements for PLN 177,052,200.77** were signed with voivodeship offices (including PLN 132,789,150.58 of FAMI co-financing, to be implemented by 30.06.2028), and in the second call - covering expressly, among others, **"personnel costs of handling applications for the CUKR residence card"** - the assessment of **16 submitted projects** with FAMI co-financing of **PLN 112,999,000.00** is under way; according to this letter (state as of August 2026) the agreements were to be signed at the turn of Q3/Q4 2026. Together that is about PLN 290 million in project value for "foreigners' services" in voivodeship offices (from FAMI alone - about PLN 247 million according to the COPE lists below). (Source: MSWiA letter to the RPO, ref. BMP.0790.3.7.2026, August 2026 - published on the RPO case page XI.541.22.2025.DB, bip.brpo.gov.pl.)
- **The state itself set up a team to repair a system about which it tells citizens, at the same time, that it is "too early" to assess it.** From the same letter to the RPO: "in June 2026 a working team (the Team) was appointed, made up of representatives of voivodeship offices and the Office for Foreigners", its aim is to analyse the functioning of the application-handling system, "the Małopolska Voivodeship Office in Kraków was entrusted with chairing the Team's work", and in addition a sub-team was created to analyse the legislation and procedures of residence legalisation. The existence of such a team is official confirmation that the system needs repair - and that someone inside the state is writing down its risks.
- **With EU money the office learned to say "please wait" - it did not learn to decide.** A review of FAMI projects in 15 of the 16 voivodeships (the call for voivodeship offices FAMI.02.01-IZ.00-*/24; according to the published project descriptions, read on 22.08.2026) shows what EU funds for "foreigners' services" go on: everywhere a helpline, IT systems, furniture and refurbishment, training - not one project funds decision-making posts that examine applications. The Łódź voivodeship office says it outright: it employs **20 people outside the civil service corps as "call-centre staff" and to register applications, not to decide them**. **The Union thus finances the capacity to tell a foreigner that his case is in progress - not the capacity to decide it.** (Sources: FAMI pages of voivodeship offices on gov.pl and their own domains, and mapadotacji.gov.pl.)
- **The same office, two speeds - depending on whose need it is.** A work permit, i.e. a document needed by the EMPLOYER, is issued on average in **82 days** (Ministry of Family, Labour and Social Policy, "Information on the employment of foreigners in Poland to 31 December 2025", verbatim in translation: "The average time of proceedings for granting a work permit to a foreigner in 2025 was 82 days"; 69.5 thousand cases pending at the end of 2025). A residence decision, i.e. a document needed by the PERSON, takes 341 days on average - four times longer. The same administration, the same foreigner, the same file of documents.
- **The state can be quick when it wants to:** 846 thousand UKR PESEL numbers granted in the first 28 days (with biometrics, about 30 thousand a day); a national visa from a consul - by statute **15 days** (art. 74a); the government bill UD408 promises selected people **60 days**. The same administration - only a different political will.
- **Counter-argument: "the sudden influx after 2022".** This explanation no longer accounts for the fourth year - and a court says so. In judgments of 13.06.2025 (**II OSK 2940/24**) and 16.02.2026 (**II OSK 1087/25**) the NSA held that extending the suspension of deadlines to the period after 30 June 2024 "took place with

manifest breach of the principle of proportionality, and thus with manifest breach of, among others, art. 45(1) in conjunction with art. 31(3) of the Constitution of the Republic of Poland and art. 47 in conjunction with art. 52(1) of the Charter of Fundamental Rights", because "a sufficient period of more than two years, in which the public authorities should have adapted the staffing and organisational potential of the migration services" had passed (both quotations verbatim from the reasoning of II OSK 2940/24, published in CBOSA; II OSK 1087/25 rules analogously, in slightly different wording); likewise the Advocate General of the CJEU in the **opinion** of 16.04.2026 in case C-254/25 (ECLI:EU:C:2026:320) - Union law precludes such a construction unless force majeure justifies it (an opinion, not a judgment; as of 6.09.2026 there was no judgment in the case). Meanwhile the suspension of deadlines was extended **six times** (see section 2), and dedicated decision-making posts have not increased beyond those 200 from 2020 and 180 under the Act of 17.12.2021 - what increased were the IT contracts and "foreigners' services" projects described above, with 41% of recruitments ending without hiring anyone. The influx was sudden in 2022; the lack of posts over four consecutive years is already a decision, not a surprise.

- **Inaction has a calculable price - where complaints worked.** The Lower Silesian voivodeship office paid in 2022-2024 over PLN 12 million in awarded costs for delay and inaction in foreigners' cases - 99.3% of such costs in the country; the other 15 offices together PLN 80 thousand (NIK, audit I/24/002/LWR, post-audit statement LWR.411.2.1.2024 and announcement of 11.12.2025). Article 100d reduces this liability to zero.
- **The burden is on people, not procedures:** from 189 residence applications per employee (Podkarpackie voivodeship office) to 500 (Łódź voivodeship office) at the end of 2022 (NIK P/23/069, p. 32); the Wielkopolskie voivodeship office, according to its own data cited by the RPO, had 1,325 cases per employee in 2022 (RPO letter to MSWiA of 27.09.2024).
- **Two lists of the Centre for European Projects of MSWiA (COPE, handed over 2.09.2026).** In 2024 all 16 voivodes signed agreements for projects worth **PLN 178,549,534**, of which **PLN 133,912,151** comes from FAMI. In 2026 all of them submitted applications in the next call (among others for handling CUKR cards for Ukrainian citizens) for **PLN 125,553,816**, including **PLN 112,998,435** from the fund - against a call budget of PLN 112,999,000. From FAMI alone that makes **about PLN 247 million**. These are the amounts of agreements and applications (the 2026 call is under assessment), not money already spent; the difference from the amounts in the MSWiA letter to the RPO (PLN 177,052,200.77 and PLN 132,789,150.58) comes from a different compilation - its cause has not been established. In the project summaries from 2024 the offices themselves described the problem: Mazowieckie - "The main problem of third-country nationals in the residence legalisation procedure in Mazovia is the long waiting time for the issue of a residence card"; Śląskie - "the deadlines for examining cases, with a continuing rise in applications, are getting longer and longer", and the project "will shorten the waiting time for a case to be handled".
- **138 indicators and none about time.** A FAMI project is accounted for through indicators: output (what was bought or organised) and result (what changed). The 16 projects from 2024 have **138** of them, including **134 output and 4 result indicators**; **13 projects have no result indicator at all**, and all four that exist have a target value of 0 (in two, at the Voivode of Warmińsko-Mazurskie, "(Anulowany)", i.e. "cancelled", was added; the third, at the Voivode of Mazowieckie, is called "brak możliwości usunięcia", i.e. "no possibility of removal"). In 15 of 16 projects there is a mandatory output indicator "Nie dotyczy (produkt)", i.e. "Not applicable (output)", with a target of 0. **Not one of the 138 indicators counts decisions issued, cases examined or waiting time - 0 of 138.** They count instead, among others, "Number of freight lift stops built", "Number of sun shields installed" and "Number of radio spots broadcast" (target: 120). Open days or information Saturdays are in the indicators of seven voivodes; Mazowieckie counts 123 information Saturdays through "attendance lists signed by employees taking part in the information Saturdays". Łódzkie wrote: "Open Days for third-country nationals. Unit of measure: Task allowances. Target value: 600.0000. Method of measurement: Task allowances, proofs of payment" - i.e. the open days will be accounted for by allowances added to employees' pay, not by the number of people served or cases decided (SL2021 printouts of 1.09.2026).
- **Eight bodies do not measure the impact on time.** Asked whether they measure the impact of the IT systems introduced on the average time of procedures, they replied in August 2026: Podkarpackie - the

office "does not measure the impact of the IT systems introduced on the average time of legalisation procedures"; Zachodniopomorskie - "The Office does not measure the impact"; Lubuskie - "The Voivode of Lubusz does not measure the impact"; Warmińsko-Mazurskie - "the authority does not carry out measurements"; Wielkopolskie - "The Office does not carry out such measurements"; Łódzkie - "the office does not make such measurements"; Opolskie - "does not carry out such measurements, does not collect statistical data in this particular form and does not have ready-made studies of this kind". Together with UdSC that is eight bodies. The MSWiA Department of European Funds, which manages FAMI in Poland: "the DFE MSWiA does not measure the impact of the IT systems introduced on the average time of legalisation procedures. Such activities may be carried out by individual voivodeship offices on their own" (e-mail of 10.09.2026). UdSC accounted from FAMI for two projects modernising the Pobyt system at a total of **PLN 27,955,991.30**; in the indicator forms the "RESULTS" field is empty. Asked about the impact on procedure time of filing applications online, mandatory from 27.04.2026, UdSC replied on 27.08.2026: "In the Office's view it is too early to carry out such analyses. We expect the visible effect on the time of procedures next year."

- **Time appeared once: when the money was divided.** In the 2026 call each voivodeship got a fixed PLN 2 million, and the rest was divided by five indicators; the last is "average procedure time in the UW", with a weight of 20%. According to UdSC data the average time in 2025 ranged from 175 days (Małopolskie) to 633 days (Śląskie); the share was calculated as "Deviation from max". **Śląskie, the office with the longest average time in the country (633 days), received 0.00% in this criterion**; Małopolskie (175 days) - 10.84% (MSWiA, DBiSO-WODO.06770.2.90.2026.EJ of 1.10.2026).
- **How much FAMI per waiting case (our calculation).** FAMI money for each office (the 2024 agreement and the 2026 application together) against the number of pending temporary residence cases according to UdSC on 1.07.2026: on average **PLN 307** per case (for the entire project, which runs until 2028); for the application alone a foreigner pays PLN 340 in stamp duty. The least goes to the offices where the wait is longest and cases most numerous: Pomorskie **PLN 181**, Śląskie **PLN 204**, Mazowieckie **PLN 236**; the most to Świętokrzyskie (PLN 1,032) and Warmińsko-Mazurskie (PLN 833). Caveats: the 2026 amounts are applications under assessment; counting only the 2024 agreements gives PLN 167 per case; UdSC's 2026 case numbers may be inflated by a change in the way of counting - with the 463,487 cases from the MSWiA reply the average is PLN 533; the order of the offices does not depend on the measure chosen.
- **People: for the helpline yes, for permanent staff no.** In the FAMI Programme approved by the European Commission, Poland wrote: "In view of the growing number of applications for work/residence permits, the infrastructural and staffing resources of the voivodes and UdSC are insufficient". In the budget of the Voivode of Podlaskie's project, personnel costs are PLN 2,142,633.75 out of PLN 4,761,311.72 (45%): helpline PLN 1,456,237.05 and project management PLN 686,396.70; a post for examining applications appears in no indicator. The Ministry of Finance in decision IP11.972.58.2026 of 22.07.2026 wrote: "These funds may not result in a permanent increase in employment and in the pay fund in the said part of the budget, because under the rules for implementing EU programmes the project being carried out is temporary in nature".
- Conclusion: the queues are not force majeure - they are the result of budgetary and staffing decisions. The demand to reinforce the offices' staff is fully supported by the state's own documents.

FAMI projects by voivodeship office (COPE lists; 2024 agreements and 2026 applications from the fund):

Voivodeship office	2024 project: value (PLN)	of which FAMI (PLN)	2026 application: FAMI (PLN)
Mazowiecki	39 540 000	29 655 000	18 007 000
Wielkopolski	19 404 000	14 553 000	10 144 000
Dolnośląski	18 594 667	13 946 000	11 358 000
Małopolski	14 012 306	10 509 229	9 533 700
Śląski	13 252 000	9 939 000	7 618 000
Pomorski	12 885 333	9 664 000	6 975 000

Voivodeship office	2024 project: value (PLN)	of which FAMI (PLN)	2026 application: FAMI (PLN)
Łódzki	11 713 332	8 784 999	7 382 936
Zachodniopomorski	10 465 333	7 849 000	6 093 000
Lubuski	7 385 333	5 539 000	4 839 000
Lubelski	5 797 297	4 347 973	5 304 000
Kujawsko-Pomorski	5 045 302	3 783 977	4 476 000
Podlaski	4 761 312	3 570 984	4 186 000
Podkarpacki	4 285 326	3 213 994	4 840 999
Warmińsko-Mazurski	4 246 667	3 185 000	4 616 000
Opolski	4 122 660	3 091 995	3 403 800
Świętokrzyski	3 038 667	2 279 000	4 221 000
Total	**178 549 534**	**133 912 151**	**112 998 435**

- **No staff for decisions, staff for cassation appeals.** The Deputy Voivode of Pomorskie writes about a lack of posts, while the voivode filed 185 cassation appeals in 2026 in cases of inaction and protracted proceedings; Mazowieckie 110, and ten of fifteen voivodes at most one. The figures come from the courts; the Voivode of Pomorskie replied that it keeps no such register. (The state loses and appeals (glos-migranta.eu/raporty/kasacje))
- **FAMI accounts for everything except the waiting.** A recital by the star of a fair for 18,450 zł, 19,483.20 zł for doors on shelves, verifiable indicators weigh 3 points of 100 in assessing an application, and not one measurement of the impact of systems on proceeding time has been sent to us by anyone. Voivode of Mazowieckie, 26.10.2026: the department „nie mierzy wpływu wdrożonych systemów informatycznych na średni czas prowadzenia postępowań legalizacyjnych” (does not measure the impact of the systems on average proceeding time). (A recital, doors for shelves and "xxx" (glos-migranta.eu/raporty/fami-2))

Sources: Money from FAMI (glos-migranta.eu/raporty/fami) · COPE lists: glos-migranta.eu/dokumenty/cope-zestawienie-uw-nabor-2024.xlsx, glos-migranta.eu/dokumenty/cope-lista-wnioskow-nabor-001-26.xlsx · indicators: glos-migranta.eu/dokumenty/cope-wskazniki-fami-2024.pdf · UdSC: glos-migranta.eu/dokumenty/udsc-fami-2026-08-27.pdf · MSWiA DFE: glos-migranta.eu/dokumenty/mswia-dfe-2026-09-10.pdf · the 2026 call: glos-migranta.eu/dokumenty/mswia-dbiso-2-90-2026-10-01.pdf · Ministry of Finance: glos-migranta.eu/dokumenty/mf-bmi1-0123-3707-2026-10-01.pdf

6. How the offices answer questions about their own deadlines

On 11.08.2026 the same public information request went to all 16 voivodes: the average time of temporary residence and EU Blue Card procedures in 2023-2026, the number of pending cases, the number of posts. Later requests - about ponaglenia, FAMI projects and the reports of the "Cudzoziemiec" Data Warehouse system - also went in the same wording to all of them. **Some offices answered with figures within two weeks, others wrote about the requester and refused.**

- **With figures:** the Voivode of Łódź replied on 25.08.2026: the average time was 336 days in 2023, 284 in 2024, 336 in 2025 and 385 in 2026. The Voivode of Kujawsko-Pomorskie wrote in an ordinary letter that there are 43 posts and 21,741 pending cases. Warmińsko-Mazurskie sent 18 reports in eight days in answer to the request for Data Warehouse reports.
- **Lublin (decision SO-VI.1331.4.2026, 24.09.2026):** "It must therefore be stressed with full conviction that the requests of [the requester] in reality not only do not serve the common good, but constitute an expression of harassment and of striving for the paralysis of public administration, harming the interest of the Republic of Poland." Filing several requests instead of one was called "a deliberate device bearing the hallmarks of manipulation". Two items were refused: the number of pending temporary residence cases and the number of posts - the same two numbers that Kujawsko-Pomorskie gave in one paragraph. Three

days earlier, on 21.09.2026, the same department had sent 24 Data Warehouse reports in answer to another request - 14 days after the request, without summons.

- **Pomerania (decision WSC-IV.1331.20.2026.PJ, 30.09.2026):** "In the opinion of the Voivode of Pomerania the actions of [the requester] are aimed at diverting as many employees of the authority as possible from carrying out their statutory tasks, so as to deepen further the problems related to the legalisation of residence of foreigners in the territory of the Republic of Poland." In the decision of 13.10.2026 it also refused the results of two standard Warehouse reports, because six requests would require "the involvement of at least 8 employees for a considerable time that is impossible to determine". UdSC, which runs the system, wrote: "From the level of a voivodeship office user these reports are generated automatically on demand". In the Warmińsko-Mazurskie export there is a row "WOJEWODA POMORSKI": on average 613 days in 2026 (to 31 August).
- **Opole - the paralysis that did not come:** on 25.08.2026 it wrote that the average times would require actions "that would lead to the complete disorganisation and paralysis of the work of the Foreigners' Affairs Division"; on 21.09.2026 it sent Warehouse reports with averages for 2024-2026, and on 9.10.2026 - for 2023.
- **Lesser Poland (decision SC-I.1331.1.11-.18.2026, 13.10.2026):** "In the case at hand we are dealing with action corresponding to the mechanism known in administrative-court case law as 'salami tactics' (salami slicing), consisting in splitting a broader demand into a series of separate requests addressed to the same entity." The decision attributes to the NSA judgment III OSK 5225/21 the sentence that "seemingly separate requests may in fact constitute cumulative elements of a much broader demand"; there is no such sentence in the text of the judgment, and the case concerned 50 requests filed in one day with a county sanitary inspector. The same decision admits: "Two of these requests could be answered in full".
- **Lower Silesia (reply to a complaint, 16.09.2026):** "However, the filing of a large number of requests for public information concerning proceedings for residence permits will certainly not speed up the examination of these cases, but will soon lead to the paralysis of the authority, which the right of access to public information was undisputedly not meant to serve." The same document explains why the first reply came only on 10.09.2026: "one of these requests was mistakenly not forwarded for handling".
- **Lubusz (decision SO-I.1331.6.2026.ABor, 2.10.2026):** "Private nature of the analysis: administrative law doctrine stresses that if someone produces analyses as an 'independent expert', he acts in his own interest (building a position, pursuing a scholarly passion)." The request concerned the final reports of FAMI projects, i.e. the spending of EU funds; the law requires no authorisation, the right to public information belongs to "everyone". In answer to a request in the same wording the Voivode of Pomerania sent on 18.09.2026 five final reports and the indicator forms.
- **Silesia:** it refused the average procedure time, among other reasons, because the ministry and UdSC "have information allowing the scale of the existing problems to be assessed and take action aimed at improving the proceedings" (decision SCV.1331.35.2026 of 7.10.2026); yet MSWiA writes that it took no supervisory action (see section 4).
- **What the courts say:** the Voivode of Pomerania defines abuse of the right to information by the judgment of the WSA in Lublin II SAB/Lu 110/23. There the applicant sent the mayor over 15 requests; the court found no abuse, wrote that "the analysed Act does not know such a ground for refusing public information", and that "it is easier to reply to several requests spread over time with a limited content than, for example, to one concerning very many issues". The NSA dismissed the mayor's cassation appeal (III OSK 3315/23 of 20.09.2024).
- **Courts versus offices: the same questions, a different reaction.** Sixteen regional administrative courts answered our requests for data within the statutory 14 days in 31 of 31 cases (median: 6 days), without a single demand to prove "particular significance", deadline extension or refusal decision. The offices, in 148 cases up to 4.11.2026: 61 such demands, 55 extensions and 45 refusal decisions; the voivodes gave a substantive answer on time to 28 of 118 requests. The court requests were simpler, so we compare behaviour, not the number of days. The court registers show that in the three largest courts 98.5% of

complaints about inaction in residence cases concern the voivode. (A court answers in six days. An office does not have to (glos-migranta.eu/raporty/sady))

- **Rulings cited in refusals.** In their refusals the offices cited case law 520 times, 179 different rulings. We checked each one in the Central Database of Administrative Court Rulings: under 10 case numbers there are cases from unrelated fields (military exercises, an expressway, a soldier's housing allowance, property left beyond the Bug River), and in 13 cases the cited ruling says something that speaks against the office. (Rulings from another story (glos-migranta.eu/raporty/wyroki-z-innej-bajki))
- **Ranking.** The offices' replies to our letters are coded under an open methodology and compiled in a ranking: glos-migranta.eu/ranking (a score per letter to an office; a sample of 9-19 letters per office - not an assessment of the office's work).
- **The minister decides appeals after the deadline and receives the ponaglenia himself.** The act gives 14 days (Article 16(2)(1)). MSWiA extends consideration to 7-22.12.2026 because it is handling „24 postępowania" (24 proceedings) from those same appeals, and advises that a ponaglenie is filed with it. All four decisions known to us (27-IP, 29-IP, 30-IP, 32-IP) set aside the voivodes' refusals; in 32-IP of 4.11.2026: „Wojewoda nie wskazał (…) ilu pracowników i na jaki czas musiałby oddelegować" (the voivode did not state how many employees and for how long). (cases letter by letter (glos-migranta.eu/sprawy))

Sources: A court answers in six days. An office does not have to (glos-migranta.eu/raporty/sady) · Rulings from another story (glos-migranta.eu/raporty/wyroki-z-innej-bajki) · One request, sixteen answers (glos-migranta.eu/raporty/jeden-wniosek-szesnascie-odpowiedzi) · How the asker becomes the accused (glos-migranta.eu/raporty/jak-pytajacy-staje-sie-oskarzonym) · glos-migranta.eu/dokumenty/lubelski-so-vi-1331-4-2026-2026-09-24-decyzja.pdf · glos-migranta.eu/dokumenty/pomorski-wsc-iv-1331-20-2026-2026-09-30-decyzja.pdf · glos-migranta.eu/dokumenty/malopolski-sc-i-1331-1-11-12-14-16-17-18-2026-2026-10-13-decyzja.pdf · glos-migranta.eu/dokumenty/duw-soc-op-1331-18-2026-mr-2026-09-16-pismo.pdf · glos-migranta.eu/dokumenty/lubuski-so-i-1331-6-2026-2026-10-02-decyzja.pdf · glos-migranta.eu/dokumenty/opolski-so-ii-1331-13-2026-2026-10-12-decyzja.pdf · glos-migranta.eu/dokumenty/slaski-scv-1331-35-2026-2026-10-07-decyzja.pdf · judgments: orzeczenia.nsa.gov.pl/doc/9717A3016F (III OSK 5225/21), /doc/D18187CDE3 (II SAB/Lu 110/23), /doc/49931F6273 (III OSK 3315/23)

7. Banks - a legal shield for those waiting

- The AML Act (on counteracting money laundering; consolidated text Dz.U. 2025 poz. 644) **does not once use the words "residence card"** (checked in the consolidated text, as of 16.08.2026) - it requires verification of identity, which a valid passport confirms (art. 36-37). No provision requires blocking an account merely because a card has expired, where identity is confirmed by a valid passport - **a blocking "on autopilot" has no basis**.
- **GIIF (General Inspector of Financial Information), Communication no. 73:** refusing or ending a relationship cannot be "dictated solely by the fact that the entity belongs to a group of clients of increased risk"; an **individual analysis** is required.
- **UKNF (Polish Financial Supervision Authority) in a letter to banks of 10.06.2025** held that a foreigner's temporary identity certificate is an identity document; refusals to open accounts are being dealt with by the RPO, and the matter of account blocks is being clarified by UKNF (correspondence ZPM.540.12.2026.MB).
- Residence while waiting is **legal by operation of law** (art. 108(1)(2) of the Act on Foreigners; since 27.04.2026 the certificate has a QR code). The office is to issue a certificate of filing the application and the state of the case within **7 days** (art. 217 § 3 KPA) - and this is enforceable in court: the WSA in Opole obliged a voivode to issue the certificate within that time although the office relied on art. 100c/100d (II SAB/Op 44/23, final judgment of 12.10.2023). A consumer for whom no provider keeps another account in zlotys has a **right to a basic payment account** (art. 59ia(1)-(2) of the Act on Payment Services) - the catalogue of grounds for refusal is closed (art. 59ic) and **does not know the criterion of citizenship**, but does know the requirement of a valid identity document (para. 7).

- **No law requires automatic account blocking: GIIF demands an individual analysis instead of automatism, and UKNF confirms that the certificate is an identity document.**

8. Borders: years of waiting mean separated families

- A **valid residence card** with a travel document entitles the holder to cross the border repeatedly without a visa (art. 242 of the Act on Foreigners) - someone waiting for a decision has no such document, and visa-free travel (e.g. on biometric passports) is limited by the 90/180-day rule. The certificate of filing an application legalises residence only "in the territory of the Republic of Poland" (art. 108) - **it does not give a right of return** and is not honoured in Schengen.
- The theoretical "loophole" - a new visa - is in practice closed: a national visa is issued by a consul (art. 66(1); even the exceptional procedure of the foreign minister runs through the consul - para. 1b), so one has to leave first; the catalogue of visa purposes in art. 60 **does not know the purpose "collecting a residence card"**; and for many groups the visa route does not exist at all: Poland has not issued tourist visas to Russian citizens since 2022, and the MSWiA regulation of 19.09.2022 (Dz.U. 2022 poz. 1963) bans their entry, among others, for tourist and business purposes; men aged 23-60 from Ukraine, once in a country under mobilisation, will as a rule not leave it again (rules of crossing the border under martial law; an easing for 18-22-year-olds from 28.08.2025 - resolution of the Cabinet of Ministers of Ukraine no. 1031), and for many Belarusians a trip to the country of origin for a visa means personal risk.
- The consequence: a parent's funeral, a sick child abroad, a sister's wedding - out of reach for years. This is not an "administrative inconvenience": the years-long impossibility of visiting one's closest family is an interference with the **right to private and family life (art. 8 of the European Convention on Human Rights)**, the proportionality of which has not been justified in any legislative document known to us - the regulatory impact assessments of successive extensions are silent on the subject. Holders of the EU Blue Card also cannot use EU mobility (art. 20-21 of Directive 2021/1883) - it requires a valid card.

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

The economic scale is shown by data on refugees from Ukraine - a population a growing part of which is moving from temporary protection into the legalisation queue described above: they generate **2.7% of Polish GDP** and about **PLN 47 billion** a year in public revenue from PIT, VAT, excise, CIT, ZUS (the Social Insurance Institution) and NFZ (Deloitte/UNHCR, 10.06.2025). ABSL (the Association of Business Service Leaders) and EY (5.05.2026): "for many organisations the migration system has today become one of the key constraints on development". In June 2026 the number of people under temporary protection fell in Poland by 6,335, while in the whole EU-27 it rose by 24,340; a fall was recorded by only 4 of 31 countries (Eurostat, migr_asytpsm). Part of that fall is transitions to a residence card, part - departures from Poland; nobody publishes the exact breakdown, but the direction against the background of the whole EU speaks for itself.

Taxes: the people standing in these queues pay taxes in Poland - the same ones that maintain the office that does not keep its deadlines towards them. They are not guests: they live here legally, work, file PIT, pay VAT and excise, and for the examination of their own application they pay separately - in the procedure for Ukrainian citizens **PLN 340 stamp duty and PLN 100 for the card, for every person, including a child**. The BGK (Bank Gospodarstwa Krajowego, the state development bank) report of 11.03.2025: migrants from Ukraine increased inflows to the Polish budget in 2024 by about **PLN 15.1 billion** in taxes and insurance contributions (PIT + pension, disability, sickness and health contributions + VAT), against about **PLN 2.8 billion** of 800+ payments for children with Ukrainian citizenship; the BGK communication states outright: "migrants from Ukraine pay more into the Polish budget than they receive in social benefits" (BGK counts **PLN 5.4** paid in for every PLN 1 of 800+; the PLN 15.1 billion figure - report p. 19, the quotation - BGK communication of 11.03.2025, bgk.pl/aktualnosc/bgk-wplyw-migrantow-z-ukrainy-na-polska-gospodarke-1/). **857,100** Ukrainian citizens pay ZUS contributions, and ZUS paid pensions and disability benefits in December 2025 to foreigners **of all citizenships together** numbering **27.4 thousand** - **0.32%** of all pension and disability benefits; ZUS does not publish a breakdown of beneficiaries by citizenship (ZUS report "Foreigners in the Polish social insurance system 2025", pp. 34-35). MSWiA spokesperson Karolina Gałecka, PAP, 8.08.2026: "According to

ZUS data, 95% of men from Ukraine of conscription age work legally in Poland and pay taxes as normal". The statutory deadline is 60 days, the average - 341. This is a service that has been paid for and not performed; we are not asking for help.

Science: one in three doctoral students at the institutes of the Polish Academy of Sciences is a foreigner - **38.1%** (449 of 1,178, RAD-on, 31.12.2025) against **13.9%** nationally. A doctoral student without a valid card travels at most under the 90/180-day visa-free regime - if their citizenship is covered by it at all; longer fellowships, archive research and EU research mobility remain out of reach (art. 242). The state cuts its own science off from the world.

- **The ledger.** 6.28 billion zł of PIT due for 2025 from citizens of 58 countries (Ministry of Finance) and 23.9 billion zł of ZUS contribution assessments. The state collects without a queue; the queue begins at the decision: on average 242-658 days from filing. (The ledger (glos-migranta.eu/raporty/rachunek))

10. Equality before the law: passport, voivodeship, origin

- **Passport.** The government bill UD408 provides for a decision in **60 days with automatic consent** if the office stays silent - but only for citizens of states to be designated by regulation; the bill's explanatory memorandum names Australia, Japan, South Korea, the USA and the United Kingdom as examples (this is a bill, not yet law). For the others: suspended deadlines to 4.03.2027 and complaints that the statute tells courts to dismiss - they win today only where the courts refuse to apply art. 100d (see section 3). **Differentiating the pace and procedural guarantees by citizenship, written directly into the provisions, requires justification - the bill gives none. Without justification it is arbitrary unequal treatment (art. 32 of the Constitution).** A systemic irony: the President has already signed an act extending tacit decision-making to **17 kinds of cases** - from tax arrears to mass events (Dz.U. 2026 poz. 875, from 1.01.2027). Foreigners' cases are not among them; the word "foreigner" does not appear in this act even once (checked in the text of the act, as of 16.08.2026).
- **It is not only us - social organisations say so in the official UD408 consultations.** The Ocalenie Foundation called the bill outright "a two-speed system" and criticised making the pace depend "on the wealth of the country of origin and the assumed 'economic usefulness' of its citizens"; the Helsinki Foundation for Human Rights assessed that the mechanism "will be ineffective as a means of counteracting delays in procedures, since it will concern little more than **1%** of applicants"; the Institute for the Rule of Law - that the bill "concentrates on improving the situation of (...) a very narrow group of foreigners, without taking initiatives for a radical shortening of the remaining **99% of residence procedures before voivodes, which are a significant brake on Poland's economic development**". (Comments of the organisations, RCL project card no. 12412103, consultations closed 22.08.2026.)
- **Voivodeship.** The same law, the same application - and the average time from **242 days in Małopolskie to 658 in Śląskie**; contact with the case officer is possible in some offices, impossible in others. The Constitution (art. 32) guarantees equal treatment by public authorities, and the KPA (art. 10) - the party's active participation in the procedure. A postcode cannot decide about rights.
- **It can be done differently - proof from Lower Silesia.** The Lower Silesian voivodeship office stated in an announcement (gov.pl, XII 2025) that the costs of judgments and compensation fell by **84.7%** year on year, complaints to the WSA by **16.1%**, and backlogs from 2022 and earlier were reduced to **507 cases** - "these results were achieved **without increasing employment**". In post-audit statement DDW.410.1.1.2026 (budget audit for 2025) NIK noted the series of average decision times given by the office: **593 days (2022) → 401 (2023) → 472 (2024) → 273 (2025)** - with the caveat that it did not check the correctness of the calculations. Since one voivodeship managed to cut the time more than twofold without new posts, the length of the queue is a matter of organisation, not force majeure.
- **Ukrainians without UKR status: the same queue, a different set of entitlements.** The act is called "on assistance to Ukrainian citizens", but art. 100d suspends deadlines for **all foreigners** - including those Ukrainian citizens who arrived before 24 February 2022 or live here on an ordinary permit (work, EU Blue Card, study, family) and have no UKR PESEL. The special act's legality of stay and the benefits it provides did not cover them. **Access to the labour market, however, they had and still have** - until 4 March 2026

under art. 22 of the special act ("A Ukrainian citizen is entitled to work (...) if the following conditions are **jointly** met: 1) **is staying legally** in the territory of the Republic of Poland **or** his stay is deemed legal under art. 2(1) (...)"), and from 5 March 2026 under the **transitional provision** of art. 41 of the winding-down act, which applies to them "accordingly" art. 3(1)(12) and art. 5a of the Act of 20.03.2025 - **for 3 years, i.e. until 5 March 2029**. A work permit is thus not needed for them, but the entitlement has been moved from a substantive provision to a transitional one, with an expiry date; in the Act on Employment of Foreigners itself Ukrainian citizens no longer appear as a separate category (art. 3(1) lists 18 categories, none by citizenship - there is only "benefits from temporary protection").

- **A hard loss that is not talked about: the sole proprietorship.** Until 4 March 2026 art. 23(1) of the special act provided that Ukrainian citizens staying legally "**may take up and conduct business activity (...) on the same terms as Polish citizens**" - a PESEL number was enough. The provision was repealed (art. 17(10) of the winding-down act: "arts. 23 and 23a are repealed"), and the transitional provision protects **only activity already taken up** (art. 42(1)). **A new registration of a sole proprietorship is no longer possible for this group** - only the company form remains (art. 4(3) of the Act of 6.03.2018 on the rules of participation of foreign entrepreneurs). Art. 41 does not save this: it extends only the provisions on the labour market, not on business activity.
- **Origin protects no one.** Art. 100d freezes deadlines **also for people of Polish origin holding the Karta Polaka (Polish Card)** applying for permanent residence (art. 195(1)(9) of the Act on Foreigners) - people who have declared 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 Act of 2013), today it is 6 months - except that this deadline **does not run** until 4.03.2027. The system does not distinguish "our own" from "strangers" - it grinds everyone.

11. Safety: facts instead of fears

- **The law provides no sanction for peaceful participation in a lawful assembly.** The 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 data of the organiser and the chair (art. 10). Peaceful participation in a lawful assembly is not a petty offence and **does not figure among the statutory grounds** for refusing citizenship (art. 31 of the Act on Citizenship) or for refusing or withdrawing a residence permit (arts. 100-101 of the Act on Foreigners), or for an obligation to return (art. 302). 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 (art. 57) is not one. The NSA has finally ruled that even repeated traffic fines **are not automatically sufficient** to refuse citizenship (II OSK 81/24, 22.04.2026).
- **"Faster" does not mean "less checking".** Consultations with the services (the Border Guard, the Police, ABW - the Internal Security Agency) have statutory deadlines of **30/60 days with a fiction of satisfaction** if no objection is raised (art. 109, art. 207 of the Act on Foreigners), and declarations of no criminal record are part of the application in MOS. It is not the checks that create the 658 days - NIK documented inaction by the Łódź voivodeship office of 111 to 779 days, and in the Kujawsko-Pomorskie voivodeship office **the first step in a case was taken only 15-448 days** after the application was filed. We demand quick decisions after checking, not giving up checking. A long procedure protects no one: throughout its duration the applicant is in any case legally in the country. Besides, refusals are a margin: the Helsinki Foundation for Human Rights reports that for **218 thousand positively decided** temporary residence applications there were only **1,837 negative decisions** (below 1%) - the queue comes not from weeding out the "dangerous" but from the lack of officials (HFPC comments in the UD408 consultations, RCL card no. 12412103).

12. Winding down the special act: three clocks, one date and a question without an answer

The Act of 23 January 2026 **"on winding down the solutions arising from the Act on Assistance to Ukrainian Citizens"** (Dz.U. 2026 poz. 203, in force 5.03.2026, signed by President K. Nawrocki) moves the

whole regime into ordinary acts and attaches dates to it. There are three clocks:

- **temporary protection** - until **4 March 2027** (EU Council implementing decision; UdSC, as of 26.08.2026);
- **the CUKR residence card** (arts. 42c-42x of the special act, applications from 4.05.2026) - valid **3 years from the date of issue**, **one-off**; the act does not provide for renewal, art. 42q is solely a replacement of the document. UdSC: "The next permit (...) will be issued **on general terms**";
- **the right to work without a permit for Ukrainians outside temporary protection** - until **5 March 2029** (art. 41 of the winding-down act).

An arithmetic that does not add up. For issuing a CUKR card the act gives the voivode **180 days** (art. 42l of the special act - extended from 90 days by the winding-down act). The same offices have for years failed to meet the **60-day** deadline for ordinary temporary residence: the national average is **341 days**, and in the MSWiA table from the reply to question no. 18089 - from **242 days in Małopolskie to 658 in Śląskie**; in the regulatory impact assessment of the UD408 bill published by the Government Legislation Centre (document of 3.07.2026, project card 12412103) the government gives its own averages for 2025: **Śląskie 633, Opolskie 610, Pomorskie 543, Kujawsko-Pomorskie 514**. The statutory deadline for the CUKR card is thus three times longer than the one the offices fail to meet anyway - and **the card is valid 3 years counted from the date of its issue**, not from collection (art. 42p(1); UdSC: "the date of collecting the card does not affect its validity"). Waiting time thus eats up the validity of the document itself.

And after three years the same thing starts again, only without the card. The act does not provide for renewal - UdSC writes outright: "The next permit (...) will be issued **on general terms**". An application filed during legal stay protects against illegality (art. 108(1)(2) of the Act on Foreigners) but **does not restore the document**: the card expires, a certificate remains - and that means a return to everything we protested against: no travel document (art. 242 of the Act on Foreigners requires a **valid** residence card), trouble at the bank counter, when signing a contract, in every official matter. At today's pace this means that **a person with a three-year card would have to file the next application in the second year of its validity** to have a chance of getting a new document before the old one loses validity - and even that without a guarantee, because deadlines in these procedures are suspended until 4 March 2027 (art. 100d).

What the CUKR card does not give: a route to permanent residence. The catalogue of grounds in art. 195(1) of the Act on Foreigners names neither a beneficiary of temporary protection nor the permit arising by law on collecting the card (art. 42r). Towards 5 years for **EU long-term resident** status the period on the CUKR card counts - but only **from the day of its collection**; UdSC writes outright: "This period **will not**, however, **include** the period of stay in Poland on the basis of UKR status" (gov.pl/web/udsc/cukr-QA, read 26.08.2026). For someone who arrived in 2022, this means the first four-five years of life in Poland do not count towards anything.

By comparison - the same Act on Foreigners can count waiting time: for a refugee and a person with subsidiary protection the period of the procedure is counted "**even if he stayed during that period in a guarded centre or in a detention centre for foreigners**" (art. 195(3)), and towards five years for EU resident status - the whole period of the protection procedure above 18 months (art. 212(1)(2)). Permanent residence is also due after 10 years of a tolerated-stay consent (art. 195(1)(6)(b)).

How others in the EU do it (texts of laws, as of 26.08.2026): **Lithuania** counts the period of temporary protection towards 5 years for national permanent residence in full (art. 53(1)(8) UTPĮ), **Latvia** gives this group an ordinary temporary residence permit for 3 years (art. 3(2) of the Act on support for the civilian population of Ukraine), **Spain** counts it in full (art. 183.1 RD 1155/2024 + Instrucciones SEM 2/2026), **Portugal** granted a residence permit at once (RCM 29-A/2022), **Czechia** enacted in 2025 a provision counting this period **by half** ("započítává jednou polovinou" - § 7w odst. 6 of Act 65/2022 Sb. as amended by Act 24/2025 Sb.), **Germany** counts it in full, though at discretion (§ 26 Abs. 4 in conjunction with § 9 Abs. 2 AufenthG). **The European precedent is older than this war: Slovenia granted permanent residence to war refugees from Bosnia by an act of 2002** (art. 24.a ZZZat).

The question that follows: winding down special solutions would be natural if the general regime worked. The general regime is today suspended deadlines to 4.03.2027 (art. 100d), disapplied remedies against inaction and **the only work-based route to permanent residence, which is a dead letter**: art. 195(1)(6)(c) requires a permit granted "for the purpose referred to in art. 114(1a)", i.e. work in an occupation desirable for the Polish economy - defined by the regulation under art. 114(5), which **has never been issued** (it does not figure in the list of implementing acts to the Act on Foreigners; the delegation is optional and has applied since 1.01.2019).

13. Warning - common errors in circulation

- **"There are half as many decisions"** - untrue. UdSC data: positive temporary residence decisions were 334 thousand (2023), 310 thousand (2024), 328 thousand (2025), and in the first half of 2026 alone - 190.9 thousand positive temporary residence decisions (the same category; all residence decisions: 233.5 thousand) - a record pace. Only permanent residence is falling (-35% since 2023, about 3-4% of volume). The real problem: **a record number of decisions and yet 658 days of waiting** - the system is structurally inefficient, not "lazy".
- **Assemblies:** the notification in the ordinary procedure is **30-6 days** before the date (art. 7 of the Law on Assemblies), in the simplified one - **30-2 days** (art. 22); "3 days" is an error. A foreigner may also be an organiser; the law does not require a PESEL number.
- The Amnesty analysis "Permanent temporariness" (04.08.2025) concerns the **travel documents of Belarusians**, not residence cards in general; Andrzej Poczobut did not "endorse" it - it is Amnesty that calls for his release.
- "In Poznań, Łódź and Kielce there are no problems" - **untrue**: 339, 386 and 325 days on average.
- The voivode is appointed by the **Prime Minister** (art. 6 of the Act on the Voivode), not the Sejm; the higher-instance authority in residence cases is the **Head of UdSC** (art. 22(2) of the Act on Foreigners).
- **"Ukrainians have lost the right to work" / "they must already have a permit" - UNTRUE.** Until 5 March 2029 every Ukrainian citizen staying legally works without a permit, for any employer (art. 41 of the winding-down act). What changed is something else: the entitlement was moved from a substantive provision to a **transitional one, with an expiry date**, and notifying the labour office is today the employer's duty under penalty of a fine - not a condition of the legality of the work (formerly, failing to notify made the work illegal).
- **"Poland breaks Directive 2003/109 by not counting the period of temporary protection" - NOT so.** The Directive does not cover this group (art. 3(2)(b)), so it neither requires nor forbids anything. Correctly: **neither the Directive nor the act excludes this period from the calculation - the exclusion was made by the office, in a notice on its website.**
- **"The CUKR card leads to permanent residence" - it does not.** It counts towards EU long-term resident status (from the day of collecting the card), but the catalogue of grounds for permanent residence in art. 195(1) contains neither temporary protection nor the permit under art. 42r.
- **Do not confuse two titles:** "permanent residence" (national, art. 195) and "EU long-term resident" (art. 211) are different institutions, with different conditions and effects. Most misunderstandings in circulation come from mixing them up.

14. Where the documents are

All the letters of the campaign and the authorities' replies on which this material rests are in the public archive: glos-migranta.eu/dokumenty - **1,459 documents, including 894 letters and 565 attachments**. Every case, letter by letter, can be seen at glos-migranta.eu/sprawy, and verbatim quotations from official letters, with the case number and the document, at glos-migranta.eu/cytaty. Each of our letters links to the authorities' replies ("Odpowiedzi"), and each reply links to the letter it answers ("W odpowiedzi na"). Where the data went (the European Commission, the European Parliament, the Supreme Audit Office, the Ombudsman and others): glos-migranta.eu/wykorzystanie. The ranking of offices' replies: glos-migranta.eu/ranking. Sixteen reports with

sources, including: The state in a loop (glos-migranta.eu/raporty/panstwo-w-petli) · What does a refusal cost? (glos-migranta.eu/raporty/ile-kosztuje-odmowa) · The ledger (glos-migranta.eu/raporty/rachunek) · The state loses and appeals (glos-migranta.eu/raporty/kasacje) · Do not pass on ponaglenia (glos-migranta.eu/raporty/ponaglenia-bez-rozpatrzenia) · A recital, doors for shelves and "xxx" (glos-migranta.eu/raporty/fami-2) · Rulings from another story (glos-migranta.eu/raporty/wyroki-z-innej-bajki) · A court answers in six days. An office does not have to (glos-migranta.eu/raporty/sady) · One request, sixteen answers (glos-migranta.eu/raporty/jeden-wniosek-szesnascie-odpowiedzi) · What the state knows about itself (glos-migranta.eu/raporty/co-panstwo-wie-o-sobie) · Sixteen offices in numbers (glos-migranta.eu/raporty/szesnascie-urzedow-w-liczbach) · A ponaglenie that nobody examines (glos-migranta.eu/raporty/ponaglenie) · Money from FAMI (glos-migranta.eu/raporty/fami) · How the asker becomes the accused (glos-migranta.eu/raporty/jak-pytajacy-staje-sie-oskarzonym). In the archive the personal data of the letters' author have been removed; the names, positions and signatures of officials remain.

Glossary

Abbreviation	Meaning
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
COPE	Centre for European Projects of MSWiA
DFE	MSWiA Department of European Funds
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
MF	Ministry of Finance
MOS	Moduł Obsługi Spraw, the case-handling system
MSWiA	Ministry of the Interior and Administration
NIK	Supreme Audit Office
NSA	Supreme Administrative Court
OPT	third-country nationals
OSR	regulatory impact assessment
PAN	Polish Academy of Sciences
PKB	gross domestic product (GDP)
RPO	Commissioner for Human Rights
SG	Border Guard
SL2021	the system for accounting for EU projects
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

Abbreviation	Meaning
UW	voivodeship office
WSA	voivodeship 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.
- **Statistics of administrative courts (NSA):** `nsa.gov.pl/dokumenty/statystyki-wsa/` - annual WSA reports, Part 2 "Complaints about inaction and excessive length of proceedings by authorities", symbol 6272.
- **FAMI projects of voivodeship offices:** `mapadotacji.gov.pl` - enter "Wojewoda" and the name of the voivodeship.
- **Documents behind this material:** `glos-migranta.eu/dokumenty` (archive), `glos-migranta.eu/sprawy`, `glos-migranta.eu/cytaty`.
- **Office for Foreigners statistics:** `gov.pl/web/udsc/zestawienia-roczne` - XLSX files with decision counts by year and voivodeship.
- **Commissioner's letters and ministry replies** (e.g. XI.541.119.2025): `bip.brpo.gov.pl` - search by reference number. MSWiA letter BMP.0790.3.7.2026(6) is published in full on the RPO case page (bip.brpo.gov.pl, case XI.541.22.2025.DB).
- **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_asytpsm`.

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.**

Version 6.2 of 5.11.2026 (addition): + the queue month by month per UdSC (section 1), ponaglenia (2), "nobody counts" (4), cassation appeals and FAMI (5), the minister and appeals (6), the PIT/ZUS ledger (9); case figures up to 4.11; archive of 1,459 documents, sixteen reports, office cards. Version 6.1 of 17.10.2026 (addition): + in section 6 a comparison of the courts with the offices (31 of 31 within 14 days against 60 demands, 36 extensions and 37 refusals) and the check of 520 citations of 179 rulings; the archive updated (1,254 documents, 738 letters and 516 attachments, replies linked to letters) and the list of eight reports. Version 6.0 of 16.10.2026 (rebuilt). Changes: + the picture across sixteen offices (section 1); + NSA statistics 2020-2025 (section 3); + the ponaglenie in practice and the lack of ministry supervision (section 4); + FAMI: COPE lists, 138 indicators and none about time, eight bodies do not measure the impact on time, FAMI per waiting case (section 5); + new section 6 (how the offices answer questions about their own deadlines); + section 14 (where the documents are); correction: the suspension of deadlines was extended six times, not five; the former section on the deadlines of 31.08 and 5.09.2026, which have passed, was removed.