

NAVIGATING NEW MIGRANTS IN THE POLISH LABOUR MARKET: ECONOMIC OPPORTUNITIES AND INSTITUTIONAL CHALLENGES

Suman Bhattarai

ORCID: 0009-0004-6899-7473

University of Economics in Katowice

Faculty of Spatial Economy and Regions in Transition

Department of Labour Market Forecasting and Analysis

1 Maja 50, 40-287 Katowice

E-mail: suman.bhattarai@edu.uekat.pl

Abstract: *The Polish economy is growing despite global uncertainty. However, multiple industries are experiencing significant shortages of workers because the number of people of workable age is declining. This economic growth and high demand in the labour market attract labour migrants from several developing countries. Traditionally, migration was from post-Soviet states, but now there is a rise in migrants from Asia and South America as well. From an economic perspective, these new migrant groups are a vital opportunity. They are an important source for the short-term skills needed in manufacturing, logistics, and services. By introducing these new demographics, Poland can maintain its productivity, support its ageing population, and achieve long-term economic stability.*

In this paper, we study this transition on the basis of a 6-year dataset (2020-2025) from the Polish Border Guard, Statistics Poland (GUS), the National Labour Inspectorate (PIP), and the Social Insurance Institution (ZUS). It also employs the theory of “The Legal Production of Illegality” to understand the migrant experience and uses a mixed method of study, combining quantitative longitudinal time-series data with qualitative institutional critique, to construct a holistic view of the labour market and border enforcement landscape.

The study discusses how the slow state bureaucracy could be one of the main causes of involvement in informal employment. This study concludes that reforms in bureaucratic complexity and the speed of permit processing could lower involvement in the informal economy. The study also recommends introducing sector-based work permits rather than employer-based ones and digitising and automating data collection, processing, and draft decision-making processes to reduce workloads and facilitate quicker processing and analysis times.

Keywords: *Labour market, informal economy, international migration, informal labour market*

JEL codes: *E2, E26, F22, J46*

1. Introduction

1.1 Background

Over the last two decades, the political and demographic landscape of Central and Eastern Europe has undergone a dramatic transformation. Traditionally a primary sender of emigrants to Western Europe, Poland has rapidly become a major net destination for global migration (Okólski, 2021). After Poland joined the European Union in 2004, the elimination of internal borders and significant wage differentials led to a substantial outflow of high- and low-skilled Polish citizens to highly developed Western European markets (Okólski, 2021). In 2022, 137,000 Polish citizens emigrated to OECD countries each year, an increase of 11%. Around 40% went to Germany, 19% to the Netherlands, and 5% to Spain from this group (OECD, 2024). Poland's labour force was particularly attracted to high-income jobs in Germany, where they became the second-largest foreign workforce in the country, and by 2023, more than 530,000 Poles were legally employed there (Brunow et al., 2026). This sustained depletion of manual labour reserves generated acute structural vacancies in 'bottleneck' occupations, which faced low recruitment rates among domestic workers due to compressed wage structures and demanding operational conditions. (Eures, 2025).

Polish enterprises have increasingly employed foreign workers to reduce deficits in industrial capacity, maintain economic growth, and address an acute domestic demographic crisis (Duszczyk & Matuszczyk, 2018). ZUS data showed that by the end of 2025, there were almost 1.29 million legally registered foreign workers, which was 8% more than the year before. While Ukrainians still make up the largest single group, at about 857,000, and Belarusians are the second largest group, at 138,700, the composition of Poland's foreign workforce is changing rapidly (ETIS, 2026). In response to persistent labour shortages, recruiters have established non-European employment pathways. The most rapidly expanding demographics of newcomers originate from Asia and South America, particularly from nations including Colombia, India, the Philippines, Nepal, Vietnam, and Georgia. Most significantly, the number of work permits issued to Colombians rose by 227% in 2024, marking a profound, structural transition from reliance on a single country to a globalised approach to migration management (Eures, 2025).

1.2 Research Objectives

This study is guided by the following main research objectives:

- The article aims to analyse the economic effects of the influx of foreign labour in Polish enterprises, especially focusing on the role of migrant workers in filling structural deficits in the labour market and stabilising the national social security system.
- Study the structural characteristics of the Polish labour market, especially the relationships between registered domestic unemployment, regional skill mismatches, and the sectoral concentration of foreign labour.
- The goal is to analyse the institutional and administrative bottlenecks in Poland's work and residence permit systems by modelling the regulatory timeline mismatch that forces legal migrants into informal employment.
- This study seeks to investigate border security concerns, document fraud, and the use of counterfeit documents resulting from the increasing migration in Poland and Europe as a whole.
- Develop specific, data-based recommendations for policies to simplify immigration procedures, reduce the administrative burden of voivodeship offices, and restrict informal labour markets.

2. Literature Review

The academic discussion on migration in Poland has been following the macroeconomic trajectory of the country. Pioneering literature (Okólski, 2021) has demonstrated that temporary circular emigration dominated early post-communist migration from Poland. But the whole dynamic changed with European integration post-2004.

One of the key theoretical bases for this study is the work of De Genova (2004). De Genova (2004), studying Mexican migrants in the United States, notes that migrant “illegality” is not an inherent trait of mobile populations or just a violation of spatial boundaries. It is less a condition than a juridical status actively produced by the state through the tactical use of immigration laws, administrative restrictions and bureaucratic obstacles. De Genova (2004) elaborates: “The sociopolitical processes of ‘illegalisation’ make migrant labour extremely vulnerable, tractable and particularly exploitable.” The state maintains control over individuals by perpetually imposing the threat of deportation, which the author refers to as ‘deportability’. This keeps a compliant workforce that fits into wider capitalist needs for cheap disposable labour. In the case of Poland, the bureaucratic complexity and delay in the decision-making process might push the migrants into a similar situation.

This structural change is described by Okólski (2021) as the “migration transition”, a successful transition from a country that is a net exporter of labour to one that is a net importer of labour, as domestic wages increase, labour reserves decrease, and capital investments are maintained. This transition has far-reaching implications for the stability of the domestic industry. Duszczyk and Matuszczyk (2018) looked at the direct correlation between the legal employment of foreigners and the mitigation of acute labour shortages in Poland. They showed that the increasing supply of foreign workers has successfully stabilised production capacities without depressing local wages or displacing native workers.

The demographic reality of Poland closely relates to the structural demand for migrant labour. The European Commission has repeatedly pointed out the shrinking working-age population in Poland as a serious medium- and long-term threat to public finances and the pension system (Duszczyk & Matuszczyk, 2018). In this respect, Zabielska & Kowalewska (2024) examined the dependence of border enterprises and regional economies on Ukrainian workers to maintain operational capacity. Their empirical findings showed that over half of regional companies depend on foreign nationals to complete essential service and production contracts, with 76% of employers reporting immediate productivity benefits after hiring migrants.

But the pace of this transition has outstripped the capacity of Polish state institutions. Duszczyk et al., (2023) report that the initial response and the social reaction to waves of forced migration, such as the 2022 Ukrainian refugee crisis, were highly adaptive, but the long-term integration of foreign workers needs to be based on the institutionalisation of robust, transparent and streamlined legal pathways. The risk of labour exploitation and precarity increases exponentially when institutional frameworks do not provide a rapid and predictable legal status.

(Kubiciel–Łodzińska et al., 2024) studied the labour integration outcomes of pre-war economic migrants and forced humanitarian migrants and found that administrative uncertainty and institutional misalignment are major obstacles to the optimal use of migrant skills, leaving high-skilled individuals to work in low-skilled, precarious jobs. The gap is widened by the extensive use of flexible civil-law contracts (*umowa zlecenie*), which offer very limited statutory protections and increase the risk of migration into the informal shadow economy.

Forgery of documents is another critical issue that requires study and prevention. The material forgery of travel documents facilitates illegal crossings at the European Union's external borders and easy access to the labour market, directly threatening the integrity of the Schengen Area and fuelling organised crime networks like migrant smuggling (Semków, 2024).

Within the Polish legal framework, safeguarding document credibility and public safety from these offences aligns directly with the state security mandates of Article 5 of the Constitution (Semków, 2022). Therefore, maintaining strict document verification standards is essential to protecting both state sovereignty and citizen rights.

3. Methodology and Data

The research employs a rigorous mixed methods analytical framework to systematically study the Polish migration ecosystem in the period 2020-2026. The methodology integrates quantitative longitudinal time-series data with qualitative institutional critique to create a holistic picture of the labour market and border enforcement landscape.

The key quantitative anchor is a composite six-year dataset (2020–2026) compiled from official Polish government repositories.

- **Macroeconomic and Labour Data:** Data on the shrinkage of the working-age population, the vacancy rates by sector and the issuing of work permits were collected from Statistics Poland (GUS) and the Ministry of Family, Labour and Social Policy (MRPiPS). As a proxy for participation in the formal labour market, we collected data on registrations with the Social Insurance Institution (ZUS) concerning social security and insurance.
- **Enforcement and Irregularity Data:** Statistical data on law enforcement were collected directly from the annual and quarterly statistical bulletins of the Polish Border Guard (Straż Graniczna) (Informacja Statystyczna). Special attention was devoted to TAB. 5 (Apprehensions for illegal border crossing), TAB. 6a-6d (Document forgeries), TAB. 7c-7d (Apprehensions for illegal stay by voivodeship), TAB. 8 (Illegal employment and business activity) and TAB. 9 (Returns). Violations data were cross-checked with the annual reports of the National Labour Inspectorate (PIP) on the evaluation of fines and rates of irregular employment among TCNs.

Qualitative Synthesis:

The qualitative insights from the official state audits, government websites, ZUS website, and border guard news reporting sites were used to contextualise the quantitative data. To obtain precise metrics on the delays in processing, the systemic causes of administrative failure and the cases of corruption, the reports by the Supreme Audit Office (NIK) assessing the Voivodeship offices (Mazowieckie, Śląskie and Dolnośląskie) were analysed.

4. Analysis and Discussion

4.1 Understanding Current Demography of Migrants in Poland

The recent data published by ZUS mentioned that currently 1,305,011 foreigners have active insurance and social security in Poland. **Tab. 1** presents a current number and percentage of foreigners living in Poland (figured as per ZUS data with active insurance). Citizens from Ukraine and Belarus are the majority of the group, consisting of 77.68% of the total foreign population. The remaining citizens combined are below 25%. Indians make up 1.91%, which rose slightly in numbers within 2 years' time as per **Tab. 2**.

Tab. 1 - Population of Foreigners in Poland in 2026

Citizenship	Population	Percentage
Ukrainian	873229	66.91%
Belarusian	140538	10.77%
Indian	24936	1.91%
Georgian	23366	1.79%
Colombian	20144	1.54%
Philippines	15540	1.19%
Moldavian	14063	1.08%
Nepali	13104	1.00%
Vietnamese	12276	0.94%
Russian	11786	0.90%
Turkish	9878	0.76%
Uzbek	9308	0.71%
Romanian	7557	0.58%
Bangladeshi	7447	0.57%
Indonesian	7381	0.57%
Italian	5840	0.45%
Other	108618	8.32%

Source 1: [www3](#)

Post-Soviet countries such as Georgia and Moldova were among the third and fourth on the list during the year of 2024, but we can observe in **Tab. 2** that there was an exponential rise in incoming migrants from Colombia, the Philippines, Nepal and India during the year of 2025. The incoming number of citizens from Colombia was about 200% in the year 2025. During the past two years we can observe the upward trajectory in citizens from Colombia (264.14%), followed by Nepal (92.93%), the Philippines (55.37%), Bangladesh (50.96%), and Uzbekistan (33.64%). In contrast, the number of citizens from Georgia declined by 9.22%, followed by

Russia (4.05%) and Moldova (3.34%). Citizens from Romania, Vietnam, India and Indonesia also have moderate growth between 16 and 25%. Turkish seems constant, with very marginal change between these years.

Tab. 2: Foreigners' Population Growths from 2024 to 2026

Citizenship	2024	2025	2026	Growth Over 3 Years
Ukrainian	755807	797990	873229	15.54%
Belarusian	129122	135310	140538	8.84%
Indian	20565	23322	24936	21.25%
Georgian	25738	25698	23366	-9.22%
Colombian	5532	16389	20144	264.14%
Philippines	10002	15550	15540	55.37%
Moldavian	14549	14486	14063	-3.34%
Nepali	6792	10627	13104	92.93%
Vietnamese	9841	10997	12276	24.74%
Russian	12284	12079	11786	-4.05%
Turkish	9797	9795	9878	0.83%
Uzbek	6965	8614	9308	33.64%
Romanian	6009	6742	7557	25.76%
Bangladeshi	4933	6532	7447	50.96%
Indonesian	6363	7219	7381	16.00%
Italian	5386	5541	5840	8.43%

Source 2: www3

Tab. 3: Population by Gender and Age Group

Citizenship	Male (by Age Group)						Female (by Age Group)		
	Total	Male	Female	20 - 34	35 - 49	50-64	20 - 34	35 - 49	50-64
Ukrainian	873229	461349	411863	171811	191473	74443	135622	181842	81723
Belarusian	140538	100157	40379	36086	49905	13522	18857	16272	4879
Indian	24936	21812	3124	10836	9943	998	2027	1018	62
Georgian	23366	18923	4443	6313	8017	4214	1179	2171	1021
Colombian	20144	14004	6140	8343	4858	647	3735	2079	227
Philippines	15540	10233	5307	1882	7026	1317	1239	3779	288
Moldavian	14063	10212	3845	4042	4367	1613	1299	1770	680
Nepali	13104	11038	2066	6597	4277	157	1507	539	18
Vietnamese	12276	8061	4215	3253	3305	1323	1718	1761	645
Russian	11786	6139	5645	1726	2916	1340	1568	2572	1340
Turkish	9878	8487	1391	4263	3106	1039	1007	331	47
Uzbek	9308	8736	571	2878	4834	1004	248	255	66

Romanian	7557	5522	2034	1818	2451	1103	527	801	563
Bangladeshi	7447	7257	190	3688	3315	244	134	53	0
Indonesian	7381	5561	1820	3211	2206	140	1106	655	53
Italian	5840	4890	949	1565	2094	1087	536	302	92

Source 3: www3

Tab. 3 presents the population by gender and age group, where we can observe the highest number of age groups within the same nationality for each gender, marked by **bold**. Correlating the data between Tab. 2 and Tab. 3, it is clear that sharply increased populations were mostly young, with the exception of the Philippines and Uzbekistan. The Turkish and Indonesian populations are also mainly young.

4.2 Economic Opportunities for Enterprises and the Nation

The integration of more than one million foreign workers has yielded major macroeconomic benefits for Poland. With the declining numbers of working-age people in Poland and emigration toward the west for better income, foreign workers have stabilised production capacities and mitigated operational disruptions within the sector (Duszczyk & Matuszczyk, 2018). Without the continuance of current levels of labour migration, Poland may encounter a national deficit of around 1.5 million job vacancies by the end of 2026 (Eures, 2025). As Zabielska & Kowalewska (2024) mentioned that 76% of domestic firms improved production and delivery once the labour gap was filled by migrants, we can observe the direct influence over the growth of enterprises.

Quantitative analysis indicates that immigration was a crucial catalyst for Poland's macroeconomic growth, especially during the peak intake of 2016–2017, contributing approximately 0.7 to 0.8 percentage points to annual economic growth (Strzelecki et al., 2022). During the 2013–2018 period, foreign labour inflows contributed around 13% to total GDP growth, with an average yearly contribution of 0.5 percentage points. Moreover, incorporating this immigrant labour supply modifies growth accounting frameworks: it markedly diminishes the estimated contribution of Total Factor Productivity (TFP) residuals, indicating that Poland's recent economic advancement has been fundamentally more labour-intensive than conventional models have suggested (Strzelecki et al., 2022).

Another specific example of the direct economic contribution of foreigners that helps to stabilise Poland's demographic tax wedge is their contribution to the Social Insurance Institution (ZUS) payroll fund. There is a qualitative change going on beyond temporary labour. Migrants are increasingly perceiving Poland as a long-term stable destination rather than as a

short-term earning stop. Some 40% of Ukrainian workers surveyed in late 2025 said they would like to stay in Poland permanently, citing secure employment contracts and the ability to reunite with family members as reasons (ETIAS, 2026). Employers also report that workers from non-European countries, mainly from Asia and South America, exhibit lower labour turnover rates, which allows businesses to invest in long-term staff development with operational certainty (ETIAS, 2026). As migration depends on the local economy as well, such numbers also rise and fall over time.

To quantify the theoretical labour shortage gap (L_{gap}) under emigration and domestic labour dynamics, we can represent the relationship as:

$$L_{gap} = L_{demand} - (L_{domestic} - L_{emigration}) \quad (1)$$

Where L_{demand} represents the total labour demand required to maintain current GDP growth, $L_{domestic}$ is the active domestic labour force, and $L_{emigration}$ represents the outward flow of Polish nationals to Western Europe. When L_{gap} is positive, a structural vacancy exists that could be filled by foreign labour ($L_{foreign}$) to prevent economic contraction:

$$L_{foreign} \geq L_{gap} \quad (2)$$

4.3 Labour Market Structure: Unemployment and Sectoral Demand

The Polish labour market is characterised by a paradox of historically low registered unemployment and large technical vacancies (Eures, 2025). Preliminary data from the Ministry of Family, Labour and Social Policy and GUS show that at the end of December 2025, the registered unemployment rate was 5.7%, and the number of registered unemployed individuals amounted to about 888,600 (www1). The rate rose slightly in a seasonal manner to 6.1% by March 2026 (www1). At the end of Q4 2025, GUS recorded 85.8 thousand job vacancies. The low baseline unemployment indicates that the job market is almost fully utilised, which means there aren't enough local workers to fill the estimated 110,000 job vacancies that are holding back the economy (www1).

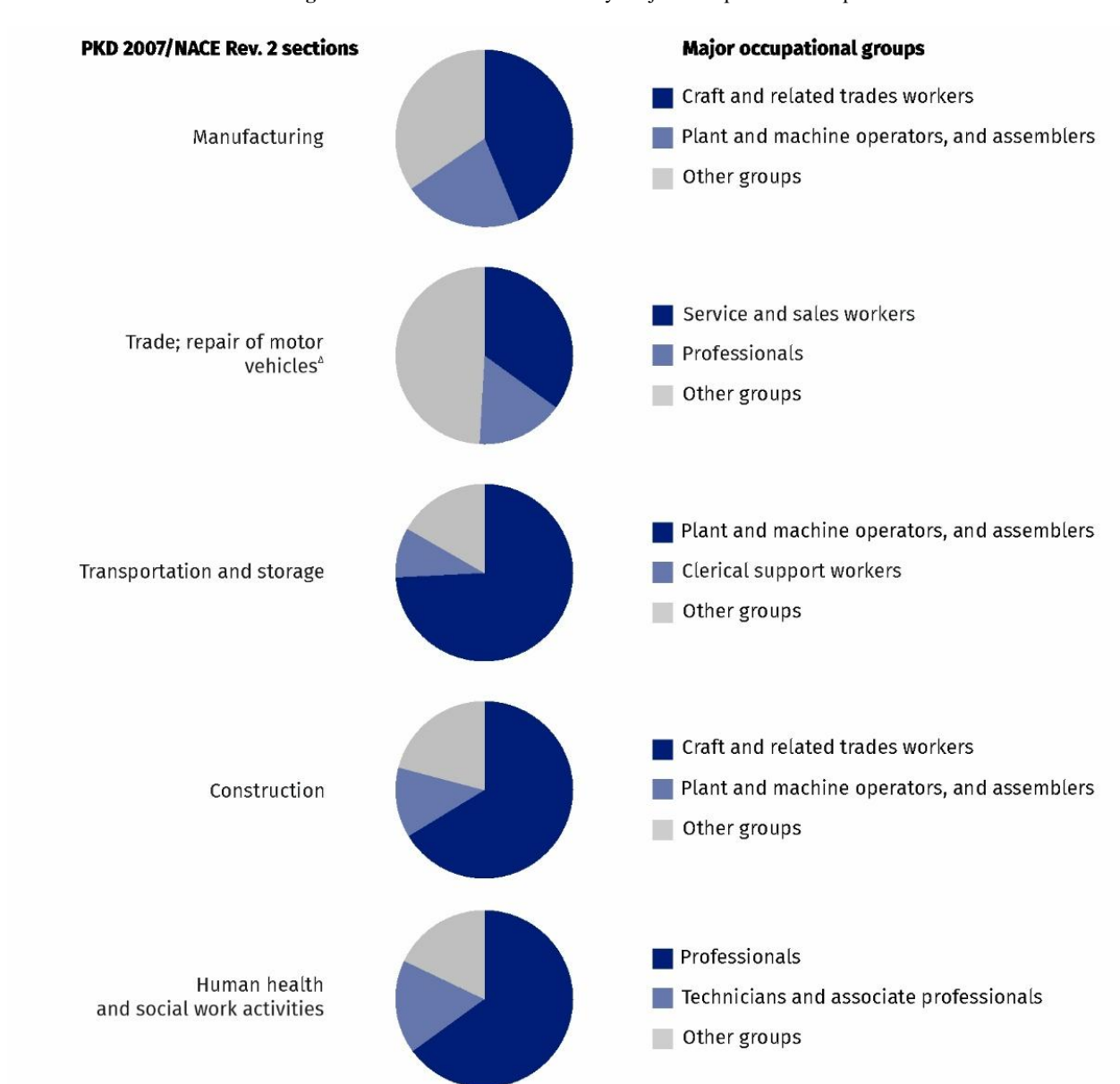
The primary structural mismatch stems from the qualifications of the domestic job-seeking population and the changing requirements of modern industry. Poland is facing severe shortages of specialists in technical fields. The Information and Communications Technology (ICT) sector is growing at 10 per cent a year, and there is an immediate shortfall of programmers, computer systems administrators and network installers. Similarly, heavy industries and services are reporting acute shortages of welders, ironworkers, bricklayers, accountants and heavy goods vehicle (HGV) drivers.

According to data from ZUS and GUS, foreign workers are concentrated in sectors that are labour-intensive, with high turnover or labour shortages in specific areas (www2). Poland's emergence as a major distribution hub in Central Europe has created the greatest demand for migrant workers in logistics and warehousing, with manufacturing, production and construction not far behind (www2).

Crucially, a high proportion of the migrant workforce stays in work under flexible, non-standard terms and conditions. In August 2025, GUS recorded the employment of 424,700 foreigners on civil law agreements (*umowa zlecenie* or *umowa o dzieło*) not on standard employment contracts (*umowa o pracę*) (www6). These civil law contracts give employers flexibility but often lead to limited labour protections for workers and contribute to high levels of precariousness in the migrant community.

Fig. 1 was prepared by GUS in the demand for labour report published in March 2026. It can clearly illustrate that there is still a skilled labour force needed in this sector. To address these structural deficits, a skilled labour force is essential. A primary method could be providing training and workshops to unemployed citizens. Such training and education can facilitate the creation of new skilled human resources in the market and fulfil the demand of a skilled labour force. An alternative method could be hiring skilled migrant workers to fill those remaining gaps.

Fig. 1: Structure Of Job Vacancies By Major Occupational Group



Source 4: GUS Demand for Labour Report Q4 2025

4.4 Institutional Bottlenecks: Work Permit Issuance

Notwithstanding the demonstrated macroeconomic demand for foreign labour, immigration management is characterised by substantial institutional and administrative impediments. The slow issuance of work permits is the main systemic bottleneck. The official statutory processing time for a standard Type A work permit is one to two months. In practice, however, processing times vary enormously depending on the voivodeship (provincial office). In areas with a high concentration of applicants, employers often have to wait two to four months, and in extreme cases up to six months, to get a work permit. The residence permit process is much slower, taking between 1 and 3 years due to the massive influx of migrants after the invasion of Ukraine. In response to growing administrative pressures, the legislative enactment of September 12, 2025, temporarily extended processing deadlines, a measure that structurally institutionalised the existing operational backlog.

Such an administrative lag creates an unsmooth transition when an employee changes employers. Under Polish immigration law, a foreigner with a temporary residence permit combined with a work permit has exactly 30 days from the termination of their previous employment to find a new employer and formally apply for the new permit (www4). However, processing a new type A work permit takes between 60 and 120 days, making it difficult for the migrant to transition legally and start working immediately.

Firms experiencing acute labour deficits face immediate operational constraints, disincentivising protracted alignment with lengthy administrative processing timelines. The 30-day search period is in tension with the 60-to-120-day administrative process. All this creates a set of conditions where employers expect migrants to start working immediately while waiting for work permits, and such a situation could push the migrant into informal employment. Working illegally while waiting for the formal work permit is against the law, and it makes both the enterprise and employee vulnerable to the system.

4.5 Document Forgery and Schengen Border Security

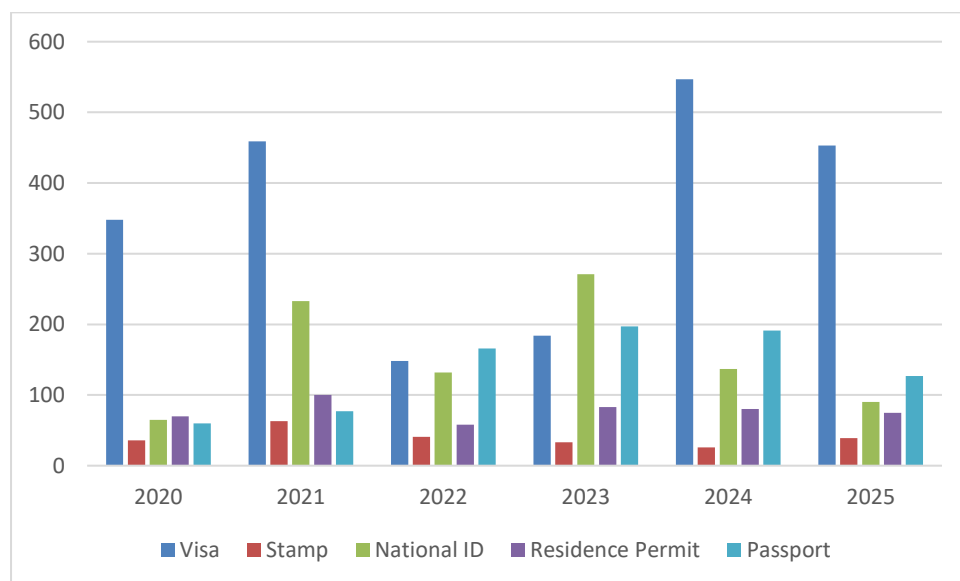
Another challenge a nation faces with rising migration is the risk of border crossing using forged documents. The Polish Border Guard (SG) has noticed a significant increase in the complexity and scale of document fraud (www7). Almost 500 people were detained in the first few months of the year trying to enter or stay in Poland with fake visas and residence permits, with Ukrainian citizens holding the largest number of fake documents (www5, www7). In one

targeted operation, Polish officers seized 2,750 counterfeit documents, with a black-market value up to 14.5 million zloty, ready for domestic and international postal shipment (www8).

Polish police also dismantled a criminal operation that had produced more than 12,000 fake official documents, from national visas to social security applications (www5). For example, border guards regularly catch non-EU nationals at the Korczowa and Medyka border crossings, such as Moldovan citizens with fake declarations of intent to work or Turkish nationals travelling on fake Schengen visas, which are shown in the below

Fig. 2 and Tab. 4. Figure 2 highlights the types of forged documents used by migrants during the verification process. Among document types, visas are the most used documents, followed by the National ID and then the passport. **Tab. 4** presents the citizens with forged documents, marked bold for the highest numbers for each year. Such documents are usually created for human trafficking and illegal migration. These criminal networks pose a threat to the internal security of Poland and the security of the entire Schengen area by creating unregulated access corridors.

Fig. 2: Individuals using false documents authorising them to cross the border/stay in the territory of the Republic of Poland, identified by the Border Guard (2020 - 2025)



Source 5: Border Guard Annual Report from 2020 to 2025

There is no exact case-based evidence, but the combination of long administrative delays and pressure from employers might influence the market in forged identity documents. Third-country nationals are legally immobile within the jurisdiction when they face delays of months to several years to obtain and renew their Temporary Residence Cards (TRCs). A segment of

this population may opt for illicit intermediary groups offering expedited residency permits in exchange for substantial financial premiums and providing false documents.

Tab. 4: Persons using false documents authorising them to cross the border/stay in the territory of the Republic of Poland, identified by the Border Guard - selected categories, by citizenship

Citizenship	2020	2021	2022	2023	2024	2025
Ukraine	1423	3325	659	46	488	389
Moldova	139	351	3	2	9	16
Georgia	70	259	130	114	50	77
Syria	22	201	149	359	182	94
Belarus	32	63	71	123	68	56
Russia	61	54	31	20	21	5
Turkey	16	34	24	40	17	8
Afghanistan	6	25	6	10	4	4
Albania	24	18	24	7	5	9
Iraq	2	19	19	9	3	11
India	3	9	11	18	24	18
United Kingdom					26	21

Source 6: Border Guard Annual Report from 2020 to 2025

4.6 The Shadow Economy: National Labour Inspectorate and Border Guard Audits

The delay in official work permits feeds directly into Poland's informal economy. Joint and independent inspections carried out by the National Labour Inspectorate (PIP) and the Polish Border Guard (SG) present the scale of illegal employment and non-compliant employment of foreign nationals. In 2025, PIP conducted over 31,000 lawful employment inspections (an increase of 9%) and reviewed the files of approximately 168,000 workers (www6). Although the total number of irregularities fell slightly year-on-year, PIP still found 5,700 foreign nationals working in full breach of national labour laws (www6).

The informal employment of migrants is usually divided into two main categories (according to PIP and SG databases)

- **Total Lack of Authorisation:** The migrant performs work without any valid work permit, declaration of entrustment or legal residence title. The most frequent infraction, PIP, reported 3,996 such cases in 2025. This situation happens quite often in the above-mentioned gap between jobs.
- **Incongruent Employment Conditions:** The migrant holds a valid work permit, but the actual employment conditions (salary, working hours, job title, and physical

workplace) do not correspond to the administrative decision. PIP found 1,157 instances of this mismatch in 2025.

The construction industry has the highest incidence of these irregularities, which are then followed by administrative services, manufacturing, services and the catering and hospitality sector.

The state has responded to these labour market regularities by enacting stringent legislative reforms aimed at increasing the cost of non-compliance for employers. Amendments to the Act on the State Labour Inspectorate, which come into force on July 8, 2026, will grant PIP inspectors unprecedented administrative powers. The inspectors shall be entitled to reclassify civil-law contracts to standard employment contracts unilaterally by means of a simplified, two-stage administrative procedure in cases where the relationship contains the features of a traditional employer-employee relationship.

5. Study Limitations

This study acknowledges several inherent data limitations, despite using a large multi-agency dataset covering the 2020–2026 period. First, the administrative data of the Social Insurance Institution (ZUS) and Statistics Poland (GUS) cover only formalised market activities and, by definition, omit the unobservable dimensions of the shadow economy. Thus, the structural under-representation of informal or semi-formal employment practices, such as underreporting actual hours worked or cash-in-hand supplements, persists.

Moreover, data collected by enforcement bodies such as the Polish Border Guard (SG) and the National Labour Inspectorate (PIP) reflect rates of detection and priorities in operations, not the total volume of irregular migration or document forgery. These changes in enforcement figures may reflect changes in legislative emphasis or the level of inspection rather than a direct change in migrant behaviour. Finally, the endogeneity between regulatory shifts, macroeconomic shocks and changing cross-border migration corridors makes it difficult to draw definitive causal inference, and thus the identified linkages must be interpreted as strong structural correlations rather than isolated causal vectors.

6. Conclusions

The rapid transformation of Poland into a net immigration country is a structural imperative stemming from demographic decline and the emigration of Polish workers to Western Europe. This process is facilitating both opportunities for migrants and enterprise in Poland, as well as

for the country itself. However, institutional inefficiencies significantly undermine the economic benefits of this shift. This systemic “transition gap” arises from the large difference between the legal 30-day window for changing jobs and the actual 60- to 120-day processing times for permits in voivodeship offices. A policy of sector-based work permits may potentially mitigate this issue.

The introduction of the Case Handling Module (MOS) and the proposed 60-day “silent consent” rule are important regulatory steps forward, but it is essential to be backed by broader structural reforms. Automating administrative procedures and introducing more flexible, sector-specific work permit models are crucial for promoting the labour market and international labour while ensuring national security and regulatory integrity.

References

- Brunow, S., Miszczak, K., Seibert, H., & Wrona, A. (2026). The wage structure of Polish workers in Germany. *International Labour Review*, 165(1). <https://doi.org/10.16995/ilr.23812>
- De Genova, N. (2004). *The Legal Production of Mexican/Migrant “Illegality.”* *Latino Studies*, 2(2), 160–185. <https://doi.org/10.1057/palgrave.lst.8600085>
- Duszczyk, M., Górny, A., Kaczmarczyk, P., & Kubisiak, A. (2023). *War refugees from Ukraine in Poland – one year after the Russian aggression. Socioeconomic consequences and challenges.* *Regional Science Policy & Practice*, 15(1), 181–200. <https://doi.org/10.1111/rsp3.12642>
- Duszczyk, M., & Matuszczyk, K. (2018). *The Employment of Foreigners in Poland and the Labour Market Situation.* *Central and Eastern European Migration Review*, (vol. 7, 2), 53–68. <https://doi.org/10.17467/ceemr.2018.07>
- ETIAS. (2026). *Foreign Workers in Poland Hit Record High.* ETIAS.COM. <https://etias.com/articles/foreign-workers-in-poland-hit-record-high>
- Eures. (2025). *Labour Market Information: Poland - EURES (EUROpean Employment Services).* https://eures.europa.eu/living-and-working/labour-market-information/labour-market-information-poland_en
- Kubiciel–Łodzińska, S., Golebiowska, K., Pachocka, M., & Dąbrowska, A. (2024). *Comparing pre-war and forced Ukrainian migrants in Poland: Challenges for the labour market and prospects for integration.* *International Migration*, 62(1), 236–251. <https://doi.org/10.1111/imig.13213>
- OECD. (2024). *International Migration Outlook 2024.* OECD Publishing. <https://doi.org/10.1787/50b0353e-en>
- Okólski, M. (2021). *The Migration Transition in Poland.* *Central and Eastern European Migration Review*, 10(2), 151–169. <https://doi.org/10.17467/ceemr.2021.16>
- Semków, D. (2022). *Selected aspects of document forgery in the context of Article 5 of the Constitution of the Republic of Poland.* *Studia Prawnicze KUL*, (3), 121–135. <https://doi.org/10.31743/sp.12343>
- Semków, D. (2024). *THE CRIME OF MATERIAL FORGERY OF DOCUMENTS IN THE CONTEXT OF ILLEGAL CROSSING OF EXTERNAL BORDERS OF THE EUROPEAN UNION AND SECURITY OF THE STATE AND CITIZENS.* *Polityka I Społeczeństwo*, 22(01), 324–338.

Strzelecki, P., Growiec, J., & Wyszynski, R. (2022). *The contribution of immigration from Ukraine to economic growth in Poland*. Review of World Economics, 158(2), 365-399.

Zabielska, I., & Kowalewska, G. (2024). *Employment of Migrants as a Response to the Needs of Entrepreneurs in Rural Border Regions—Examples from Poland*. Sustainability, 16(13), 5614. <https://doi.org/10.3390/su16135614>

Web

(www1): <https://stat.gov.pl/en/topics/labour-market/demand-for-labor/the-demand-for-labour-in-quarter-4-2025,2,60.html>

(www2): <https://www.cedefop.europa.eu/en/data-insights/poland-mismatch-priority-occupations>

(www3): <https://psz.zus.pl/en/kategorie/ubezpieczeni/ubezpieczenia-emerytalne-i-rentowe>

(www4): <https://etias.com/articles/foreign-workers-in-poland-hit-record-high>

(www5): <https://www.europol.europa.eu/media-press/newsroom/news/criminal-group-forging-over-12-000-official-documents-halted-in-poland>

(www6): <https://hrlaw.pl/en/flash-news/the-national-labour-inspectorate--pip--is-increasing-the-number-of-inspections-of-lawful>

(www7): <https://www.slaski.strazgraniczna.pl/sm/aktualnosci/58455,Falszerze-dokumentow-stana-przed-sadem.html>

(www8): <https://www.zawszepomorze.pl/artykul/13287,zlikwidowali-fabryke-dokumentow-podrabiali-dowody-paszporty-i-wizy>