Global Immigration alert

September 2025

Poland

President vetoes amendment to the Ukrainian Special Act

Executive summary

On 25 August 2025, Poland's president vetoed a proposed amendment to the Ukrainian Special Act, thereby eliminating automatic extensions of residence permits for Ukrainian nationals effective 1 October 2025. Ukrainian nationals who currently reside in Poland may remain in the country beyond this date; however, they may be required to apply for residence authorization under a different immigration category.

Background

The Ukrainian Special Act was introduced following the outbreak of the armed conflict in Ukraine. The Act applies to individuals who reside in Poland pursuant to the EU Temporary Protection Directive (TPD) and those who were already residing in Poland (e.g., those who entered for work purposes) prior to the armed conflict. The Act grants qualifying Ukrainian nationals in Poland automatic extensions of their residence permits, removing the need for individuals to file renewal applications manually.

Key developments

The president's veto, and resulting changes in the immigration rules for Ukrainian nationals, impact the following categories of individuals:

- *Ukrainian nationals residing in Poland prior to the armed conflict:* These individuals are required to submit applications to extend their residence permits or apply for new ones before 1 October 2025 to maintain lawful status. Until their new permits are issued, they may face restrictions on international travel. If their applications are denied, they may be required to depart Poland unless another lawful basis for residence is established (e.g., under the TPD).
- *Ukrainian nationals who entered Poland under the TPD:*
  - *Residence permit eligibility:* Individuals holding a PESEL UKR (i.e., a special temporary protection status for eligible Ukrainian nationals) may apply for one of four types of residence permits: the EU Blue Card, Single Permit, Family Reunification or Sole Proprietor. Those who do not qualify for any of these permits may continue to reside in Poland under the TPD until 4 March 2027.
  - *Documentation and travel:* Diia.pl (i.e., a digital residence permit issued under the Special Act) will be deactivated on 1 October 2025. To maintain the ability to travel internationally and comply with lawful status requirements, individuals are required to obtain a certificate of temporary protection from the Office for Foreigners. The certificate is typically issued on the same day the original documents are verified. Travel outside Poland may be restricted and re-entry may be impacted until the certificate is issued.

Individuals residing in Poland pursuant to the TPD will continue to have unrestricted access to the Polish labor market until 4 March 2027. However, they may face limitations in accessing certain public services, including educational and social support programs.

Impact on employers

The changes resulting from the presidential veto introduce stricter and more complex requirements for impacted individuals residing and working in Poland. Employers may review and update their internal policies to ensure compliance with the new requirements and minimize potential business disruptions.

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Key steps
EY will continue to monitor these developments. Should you have any questions, we encourage you to contact one of our immigration professionals.

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