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COMMISSION STAFF WORKING DOCUMENT

**2025 Rule of Law Report
Country Chapter on the rule of law situation in Poland**

Accompanying the document

**Communication from the Commission to the European Parliament, the Council, the
European Economic and Social Committee and the Committee of the Regions**

**2025 Rule of Law Report
The rule of law situation in the European Union**

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ABSTRACT

Significant efforts have been made in Poland towards the implementation of the Action Plan on the Rule of Law to address long-standing concerns regarding judicial independence. A law is being prepared to address the situation of judges appointed at the request of the National Council for the Judiciary in its post-2017 composition, on which the Government committed to reconsult the Venice Commission. Plans to amend the structure of the Supreme Court have been proposed to strengthen its independence, including the dismantling of the Chamber of Extraordinary Control and Public Affairs. Acts amending the Law on the National Council for the Judiciary and the Act on the Constitutional Tribunal were adopted by the Parliament to address the relevant serious concerns but have not yet entered into force due to their referral to the Constitutional Tribunal by the President of the Republic. Further significant steps have been made towards separating the office of the Minister of Justice from that of the Prosecutor General, while a law to that end is yet to be adopted. The level of perceived judicial independence in Poland continues to be very low although it has slightly increased among companies, while the efficiency of courts remains stable.

The Polish Government is working to strengthen the legislative framework against corruption and to improve coordination among investigating entities. There is no comprehensive anti-corruption strategy in place. Laws combatting corruption are enforced in practice, with large-scale corruption cases involving public officials and politicians being investigated. The EPPO is now fully operational to investigate and prosecute crimes affecting the financial interests of the Union. There have been no further steps to address the broad immunities of top executives and impunity clauses or to introduce lobbying rules. Weaknesses remain regarding political party financing, but the authorities are starting to address the issue. The new whistleblower protection law entered into force and limited steps have been taken towards establishing an electronic asset declaration and verification system. Significant corruption risks have been identified in public procurement, with potential impacts on investments and business activities.

A planned media law reform is to address concerns regarding the impartiality and independence of the media regulator as well as the independence and pluralism of public service media more broadly. Meanwhile, some further efforts have been made to strengthen the process of granting operating licences and to ensure the independent governance and editorial independence of public service media, though challenges remain in safeguarding media pluralism and, particularly in situations involving foreign investment in media ownership. Politically biased media content has decreased, and state advertising expenditure is more evenly distributed. The Government is working on a new state-funded model aimed at replacing the licence fee system. The legal framework for access to public information remains stable, though stakeholders report certain challenges with its implementation. The number of strategic lawsuits against public participation (SLAPPs) has decreased and the Government continues to address challenges affecting the safety of journalists and the protection of journalistic sources and confidential communications.

Poland strengthened the rules governing consultations to improve the quality of legislation. Further steps have been taken to improve the framework in which civil society operates. Efforts are under way to address instances of abuse of power by public officials. The Ombudsperson continues to fulfil a key role in the system of checks and balances.

RECOMMENDATIONS

Overall, concerning the recommendations in the 2024 Rule of Law Report, Poland has made:

- Significant progress on separating the office of the Minister of Justice from that of the Prosecutor General and to ensure the functional independence of the prosecution service from the Government.
- Limited progress on standardising the online system for asset declarations of public officials and Members of Parliament and no progress on introducing lobbying rules.
- Some progress on ensuring independent and effective investigations and prosecutions, address the broad scope of immunities for top executives and remove previously introduced impunity clauses in legislation in order to enable a robust track record of high-level corruption cases.
- Some further progress on ensuring that fair, transparent and non-discriminatory procedures, are adhered to for the granting of operating licences to media outlets.
- Some further progress on ensuring an effective legislative framework for the independent governance and editorial independence of public service media, taking into account European standards on public service media.
- Some further progress on improving the framework in which civil society operates.

On this basis, and considering other developments that took place in the period of reference, and in addition to recalling the obligation to comply with the rule of law related rulings of the Court of Justice of the EU and the rule of law related infringement procedures referred to in the country chapter as well as recalling the relevant commitments made under the Recovery and Resilience Plan, it is recommended to Poland to:

- Continue to advance on the implementation of the Action Plan on the Rule of Law, including as regards the National Council for the Judiciary and the Constitutional Tribunal.
- Take forward the reform to separate the function of the Minister of Justice from that of the Prosecutor-General and to ensure functional independence of the prosecution service from the Government.
- Introduce rules on lobbying and a standardised online system for asset declarations of public officials and members of Parliament while ensuring effective verification.
- Continue efforts to ensure independent and effective corruption investigations and prosecutions, address the broad scope of immunities for top executives and remove impunity clauses to enable a robust track record of high-level corruption cases.
- Take forward reforms to ensure that fair, transparent and non-discriminatory procedures are adhered to for the granting of operating licences to media outlets.
- Take forward reforms to ensure an effective legislative framework for the independent governance and editorial independence of public service media, taking into account European standards on public service media.
- Continue ongoing efforts to improve the framework in which civil society operates, taking into account European standards on civil society organisations.

I. JUSTICE SYSTEM¹

Independence

The level of perceived judicial independence in Poland continues to be very low among both the general public and companies. Overall, 26% of the general population and 24% of companies perceive the level of independence of courts and judges to be ‘fairly or very good’ in 2025². The perceived judicial independence among the general public has slightly decreased in comparison with 2024 (28%) and 2021 (29%). The perceived judicial independence among companies has slightly increased in comparison with 2024 (22%) and has increased in comparison with 2021 (18%).

Significant efforts have been made to implement the Action Plan on the Rule of Law and Poland is delivering on its commitments to consult the Venice Commission on new legislation. Poland consulted, in line with the Action Plan³, the Venice Commission on legislative proposals concerning the prosecution system, the National Council for the Judiciary, and the Constitutional Tribunal⁴. Poland pledged to take account of the recommendations made by the Venice Commission and to reconsult it as necessary⁵. A draft law was proposed to ensure the implementation of European Court of Human Rights’ (‘ECtHR’) rulings, providing, among others, for better coordination between public authorities⁶. Amendments were adopted to implement a ruling of the Court of Justice of the EU (the Court of Justice) on judicial secondments in criminal courts in Poland⁷. The amendments include changes to the institution of delegation in the ordinary and military courts. The Government is also working on two draft laws which would remove provisions from a 2019 law on the judiciary, found by the Court of Justice to be in violation of EU law, and on a law restoring judicial self-government in the functioning of courts and changing the structure of ordinary disciplinary courts⁸. The President of the Republic referred three acts to the Constitutional Tribunal: the Act of 12 July 2024 amending the Law on the National Council for the Judiciary and the two Acts of 13 September 2024 on the Constitutional Tribunal.

Further steps have been taken to address the situation of judges appointed at the request of the National Council for the Judiciary in its post-2017 composition. In February 2025,

¹ An overview of the institutional framework for all four pillars can be found [here](#).

² Figures 51 and 53, 2025 EU Justice Scoreboard and Figures 49 and 51, 2023 EU Justice Scoreboard. The level of perceived judicial independence is categorised as follows: very low (below 30% of respondents perceive judicial independence as fairly good and very good); low (between 30-39%), average (between 40-59%), high (between 60-75%), very high (above 75%).

³ 2024 Rule of Law Report, Poland, pp. 3-4.

⁴ See Venice Commission (2024), (2024a) and (2024b).

⁵ This concerns notably the draft law on the Public Prosecutor’s Office and the draft law on the restoration of the right to an independent and impartial court established by law as presented in February 2025.

⁶ Polish Government (2025), written input, p. 25; cf. draft law UD177 inscribed in the legislative work schedule of the Council of Minister. See Pillar IV, p. 21.

⁷ The Law of 6 March 2025 amending the law on the Ordinary Courts Organisation and the law on the Military Courts Organisation. See CJEU judgment of 16 November 2021 in joined cases C-748/19 to C-754/19. The law would provide criteria allowing the secondment of a judge and its revocation by the Minister of Justice. The National Council for the Judiciary asked to veto the law or refer it to the Constitutional Tribunal. See NCJ (2025a) and (2025b). The President of the Republic signed the law on 16 April 2025.

⁸ Polish Government (2025), written input, pp. 6-7; the draft law of 21 January 2025 amending the law on ordinary courts organisation (rendered public on 21 March 2025) and the draft law of 13 May 2025 on the restoration of the right to an independent and impartial court established by law by regulating the effects of resolutions of the National Council of the Judiciary adopted in 2018-2025.

the Codification Committee for the Courts and Prosecution Systems (the Codification Committee) prepared, for the Government's consideration, two proposals on the status of judges appointed at the request of the National Council for the Judiciary (NCJ) in its post-2017 composition. On that basis, and to follow up on its commitments in the Action Plan, in April 2025, the Ministry of Justice proposed for the Government's consideration a draft law⁹. The draft law provides for the removal of 1 600 judges¹⁰ while keeping most of them in office on the basis of a classification. Those judges considered as appointed in an irregular procedure, shall be classified as belonging either to the group of around 1 200 judges who, prior to their current appointment, obtained a judicial post via regular procedures, or to the group of around 360 ordinary judges and 80 Supreme Court judges who obtained judicial status only upon the request of the NCJ in its current composition. The judges concerned would be able to legally challenge their classification. In principle¹¹, it would not be possible to contest rulings issued by these judges. The Venice Commission had recalled¹² that any arrangement chosen by Poland to address the situation of judges appointed in a deficient procedure would need to comply with the following parameters: (a) address the status of all judges appointed in a deficient procedure; (b) the assessment of the effects of the deficient appointment procedure should not be conducted by a government-controlled body (and if it is not conducted by a judicial body, some form of judicial review should be available); (c) the assessment should be conducted on the basis of pre-established criteria and procedures (including elements of fair trial); (d) the assessment and the consequences following from that assessment should be in line with the principle of proportionality, requiring some form of individual assessment. The Venice Commission considers that some form of assessment by reference to groups ('cohorts') of appointments including, where necessary, individual circumstances of appointment or promotion, would be needed; and (e) the mechanism should allow a fairly rapid settlement of the issue. Given the complexity of the matter and its potential impact on the functioning of the justice system, the Polish authorities reconsulted the Venice Commission on the draft law proposed by the Ministry of Justice and committed to take its opinion into account¹³.

Ordinary court judges are protected from unjustified disciplinary proceedings and are more involved in decision-making regarding the courts where they adjudicate. As announced in the Action Plan on the Rule of Law, the Minister of Justice continues to appoint *ad hoc* disciplinary officers to terminate undue disciplinary proceedings against judges¹⁴ and launch new disciplinary proceedings. The Main Disciplinary Officer for Ordinary Court Judges

⁹ According to the draft, judges who had already been appointed in a regular procedure in the past prior to assuming their current post would have the resolution giving rise to their appointment *ex lege* invalidated by law and would be *ex lege* delegated for two years to continue in their current post (except Supreme Court and Supreme Administrative Court judges), pending a new competition before a reformed NCJ.

¹⁰ 13% of the overall number of judges in Poland. Judges appointed for the first time by the NCJ in its post-2017 composition (in the same deficient procedure) following the training provided by the National School of Judiciary would remain in office.

¹¹ The only exception envisaged concerns rulings issued in proceedings in which a party contested the regularity of the composition of the court, and it would be possible exclusively at the request of such a party.

¹² Venice Commission (2024c), requested by Poland on 10 July 2024. The opinion was based on four abstract questions posed by the Minister of Justice who had not provided any draft legislative text.

¹³ Ministry of Justice (2025i).

¹⁴ So far, the Minister of Justice issued 24 ordinances appointing such officer which took over 95 proceedings concerning 63 judges. Ad hoc officers joined 66 proceedings initiated by the main Disciplinary Officer and his two Deputies. 35 disciplinary proceedings were discontinued, 5 indictments were withdrawn, and 26 new disciplinary cases were initiated. See: Polish Government (2025), written input, p. 8.

and his Deputy were dismissed from office¹⁵. The Minister of Justice dismissed presidents of ordinary courts appointed without the involvement of judicial self-government bodies¹⁶. The Constitutional Tribunal found such dismissals to be unconstitutional because provisions on which they are based do not require a binding opinion of the National Council for the Judiciary¹⁷.

Plans for amending the structure of the Supreme Court are being prepared with a view to strengthen its independence. A draft law was proposed by the Ministry of Justice in April 2025¹⁸ that would dismantle the Chamber of Extraordinary Control and Public Affairs and provide for a number of important changes. The draft law would also remove the competence of the President of the Republic to designate an ‘acting First President of the Supreme Court’ and to decide on the overall number of Supreme Court judges without a prior request of the College of the Supreme Court, thereby limiting the potential influence over the judiciary. The President of Poland appointed a new President of the Chamber of Extraordinary Control and Public Affairs and a new President of the Civil Chamber, who are both judges found to have been appointed in violation of Article 19(1) TEU and Article 6(1) ECHR requirements¹⁹. The office of President of the Labour Chamber remains vacant. The First President of the Supreme Court is subject to several disciplinary proceedings and a criminal investigation²⁰. The 2025 budget of the Supreme Court was reduced, which led to a reduction of clerical staff²¹.

Legislation addressing the lack of independence of the National Council for the Judiciary and the serious concerns related to the Constitutional Tribunal have not yet entered into force. Three acts amending the law on the NCJ²² and establishing the Constitutional Tribunal²³ were adopted by Parliament to follow up on their commitments in the Action Plan and restore the independence of these two bodies. The Venice Commission, while welcoming the overall aim of the legislative proposals, recommended more moderate means than declaring all judgments that involve irregularly appointed judges invalid, such as the possibility to reopen

¹⁵ The dismissals were motivated by deficiencies in carrying out duties of disciplinary officers and supervising court as their presidents and as regards the Deputy Officer, in view of the support provided to candidates running for the office of NCJ judge-member in 2022; Ministry of Justice (2025c) and (2025d).

¹⁶ See e.g. the Ministry of Justice (2025a) and (2025b).

¹⁷ Ruling of 16 October 2024 in K 2/24; also criticised by the Supreme Court (2025), written input, p. 4 and “Sędziowie RP” (2025), written input, pp. 19-23.

¹⁸ Ministry of Justice (2025i).

¹⁹ On 26 February 2025, the President of the Republic appointed as President of the Chamber of Extraordinary Control and Public Affairs a judge who sat in the bench contested by the ECtHR in its judgment 8 November 2021, *Dolińska - Ficek and Ozimek v. Poland*, 49868/19; Supreme Court (2025a). On 27 September 2024, the President of the Republic appointed as President of the Civil Chamber a judge who sat in the bench contested by the ECtHR in its judgment of 3 February 2022, *Advance Pharma Sp. Z O.O v. Poland*, 1469/21; Supreme Court (2024a). The CJEU found that benches composed of judges appointed in circumstances analysed by the ECtHR in the aforementioned rulings to not comply with the requirements of Articles 19(1) TEU and 267 TFEU; CJEU, judgment of 7 November 2024 in case C-326/23 and of 21 December 2023 in case C-718/21.

²⁰ Supreme Court (2025), written input, p. 4; the criminal investigation was opened in view of the First President’s refusal to convene, at request of its members, the Tribunal of State (cf. National Prosecution (2024)). The First President of the Supreme Court delivered several statements contesting actions announced by the Government to implement its Action Plan. See e.g. Supreme Court (2025), (2024c), (2024d).

²¹ Supreme Court (2025), written input, p. 3; also Supreme Court (2024e).

²² On the content of the law and its aspects which *prima facie* do not comply with the opinion of the Venice Commission thereon, and other opinions of stakeholders, see the 2024 Rule of Law Report, Poland, pp. 7-8.

²³ See 2024 Rule of Law Report, Poland, pp. 9-10.

proceedings²⁴. Similar opinions were issued by other stakeholders calling to reflect more on the approach being taken²⁵. The Supreme Court and the National Council for the Judiciary considered the two drafts to violate the Polish constitution²⁶. The President of the Republic referred the amendments to the law on the NCJ and those related to the Constitutional Tribunal to the Constitutional Tribunal for its review, where they remain pending. Considering the views of stakeholders, the Government is working on a revised proposal on which it committed to reconsult the Venice Commission.

Pending new legislation, serious concerns related to the Constitutional Tribunal remain.

Since March 2024, the Government refuses to publish in the Official Journal any judgments issued by the Constitutional Tribunal, on the grounds that the Constitutional Tribunal is not a legitimate constitutional body²⁷. The *Sejm* ceased appointing judges to vacant posts in the Constitutional Tribunal²⁸ considering it to no longer perform constitutional functions²⁹, while in February 2025, the President of the Republic appointed a new Vice-President of the Constitutional Tribunal³⁰. In March 2025, the Advocate General in his opinion proposed to the Court of Justice to uphold the Commission’s infringement action and declare that Poland has failed to fulfil its obligations under EU law in view of the Constitutional Tribunal and its case-law³¹. The new President of the Constitutional Tribunal stated that this would be a grave violation of the Constitutional Tribunal’s competences and expressed concerns about Poland’s support of the Commission’s infringement action, on the grounds that EU law cannot limit the Constitutional Tribunal’s competences³². He also asked the prosecutor’s office to open an investigation³³ and requested the Deputy Disciplinary Officer for Judges in office since 2018 to initiate disciplinary proceedings against judges who refuse to apply the Constitutional Tribunal’s rulings³⁴. With the exception of the President of the Republic, representatives of the executive and legislative powers are no longer initiating cases, participating in hearings or

²⁴ Venice Commission (2024c). The Opinion recommended the authorities to reconsider the *ex lege* invalidation of judgments and orders involving irregularly appointed judges, providing for a more tailored approach through envisaging the possibility to have proceedings reopened.

²⁵ OSCE-ODIHR (2024b), National Chamber of Legal Councillors (2024), Ombudsperson (2024) and National Bar Council (2024) – all of which supported the aim of the laws but considered important to reflect on the approach towards the *ex lege* invalidation of all rulings issued in an irregular composition. 7 NGOs (2025), written input, pp. 42-43.

²⁶ Opinion of the National Council for the Judiciary of 2 July 2024 SPS-WP.020.87.4.2024 and of the Supreme Court of 19 April 2024 BSA III.021.8.2024.

²⁷ See Government resolution n° 162 of 18 December 2022.

²⁸ As of the date of publication of the report, there are overall 11 judges of the Constitutional Tribunal.

²⁹ Pursuant to the Resolution of 6 March 2024 of the *Sejm*, cf. the 2024 Rule of Law Report, Poland, p. 9.

³⁰ On 7 December 2024, the President of the Republic appointed a new Tribunal President. The Tribunal declined to inform whether the Tribunal judges appointed to already occupied posts had participated in the selection procedure of candidates (cf. Helsinki Foundation for Human Rights (2025)).

³¹ Opinion of 11 March 2025 in case C-448/23; on the infringement procedure see 2023 Rule of Law Report, Poland, p. 9.

³² Constitutional Tribunal (2025a).

³³ Allegedly committed by i.a. the Prime Minister, Marshals of the Parliament and certain judges and prosecutors, while requesting that the investigation be conducted by a prosecutor of his own choosing; cf. Constitutional Tribunal (2025b) and (2025c)

³⁴ Constitutional Tribunal (2025d).

providing written contributions before the Constitutional Tribunal³⁵. The Constitutional Tribunal also ruled on the constitutionality of EU Treaty provisions³⁶.

The National Council for the Judiciary continues to operate despite serious concerns as to its independence. Since July 2024, the NCJ adopted over 140 resolutions requesting judicial appointments to the President of the Republic. The Minister of Justice continues not to publish vacant posts in ordinary courts, citing a need to avoid a deterioration of legal certainty in the justice system³⁷. According to the Supreme Court, this has a negative impact on the efficiency of the ordinary judiciary³⁸. An Ad Hoc Disciplinary Officer opened disciplinary proceedings against 18 judges-members of the NCJ on grounds of their participation in a body that does not meet constitutional requirements³⁹. The NCJ has criticised decisions of the Government⁴⁰ and has appointed a special Committee to examine and monitor what it considers to be a political harassment of judges and assistant judges⁴¹. The annual budget of the NCJ was decreased⁴².

Significant progress has been made on the recommendation to separate the office of the Minister of Justice from that of the Prosecutor General and to ensure the functional independence of the prosecution service from the Government⁴³. The Government tabled in July 2024⁴⁴ a draft law separating the function of the Prosecutor General and the Minister of Justice. The Venice Commission welcomed it, while noting shortcomings as regards notably the procedure for appointing and dismissing the Prosecutor General⁴⁵ and recalling that the law is only a first step in an overall reform of the prosecution system. In December 2024, the Standing Committee of the Council of Ministers adopted the draft law, taking into account the recommendations made by the Venice Commission⁴⁶. The National Prosecution reviewed criminal investigations carried out in the period 2016-2023, revealing significant irregularities in most of the cases it investigated⁴⁷. The criminal investigation against Supreme Court judges

³⁵ This follows the resolution of the *Sejm* of 6 March 2024 and of the Council of Ministers of 18 December 2024 (see above).

³⁶ Ruling of 10 June 2025 in case K 10/24, where the Constitutional Tribunal asserted the unconstitutionality of Article 191(1) read in connection with Article 192 let. c of the Treaty on the Functioning of the European Union, “interpreted in such a way that the unanimity requirement of the Council is limited to measures whose primary intended result—arising from their purpose or content—is to significantly affect the Republic of Poland’s choice between different energy sources and the general structure of its energy supply”.

³⁷ See the 2024 Rule of Law Report, Poland, p. 7.

³⁸ Supreme Court (2025), written input, p. 3.

³⁹ Ministry of Justice (2025c). These proceedings were criticised by the First President of the Supreme Court and by the Council itself; Supreme Court (2025) and National Council for the Judiciary (2025a).

⁴⁰ I.a. as regards legislation aimed at implementing CJEU case-law.

⁴¹ National Council for the Judiciary (2025c) and (2025d).

⁴² The decrease of the government is of ca. 15.2% in comparison to the 2024 annual budget (reduction from ca. PLN 24.94 million to PLN 21.16 million). On 10 May 2025, the Constitutional Tribunal considered the decrease unconstitutional (case K 2/25).

⁴³ The 2024 Rule of Law Report recommended to Poland to ‘[c]ontinue efforts to separate the function of the Minister of Justice from that of the Prosecutor-General and to ensure functional independence of the prosecution service from the Government’.

⁴⁴ Draft law UD95; the draft law tabled on 14 July 2024; Polish Government, written input, p. 8.

⁴⁵ Venice Commission (2024). The Opinion welcomes the proposed aim of the reform. It identifies a number of issues, in particular regarding the procedures for the appointment and accountability of the Prosecutor General, as well as the composition and powers of the National Prosecution Council.

⁴⁶ Permanent Committee of the Council of Ministers (2024). The draft law removes MPs and Senators from the list of entities allowed to propose candidates to the office of Prosecutor General.

⁴⁷ National Prosecution (2025). The partial audit covered 200 out of a total of 600 cases. 51 cases were initiated against independent judges, prosecutors, and opposition supporters. 37 cases were found to have been conducted without significant issues. The remaining 112 cases presented serious reservations that should lead

for the content of their judicial decisions, opened in 2020, was discontinued⁴⁸. The Prosecutor General instructed prosecutors to request the recusal of judges of the Supreme Court appointed at the request of the NCJ in its post-2017 composition⁴⁹. One of the Deputy Prosecutors-General appointed by the previous Prosecutor General was suspended, following a criminal investigation he had reportedly opened in violation of the applicable legislation⁵⁰. The secondment of prosecutors, perceived as a form of disciplinary sanction, ceased. Overall, significant progress has been made to separate the office of the Minister of Justice from that of the Prosecutor General and to ensure the functional independence of the prosecution service from the Government.

Quality

The Government engaged in efforts to boost digitalisation of ordinary courts. The Ministry of Justice is developing a tool to digitalise access to justice in ordinary courts and is setting-up a Digital Consumer and Competition Protection Court⁵¹. The Ministry also adopted a “Digital Court” strategic programme setting out steps to be taken by 2029 to optimise the effectiveness of the justice system and make it fit for the digital age. The real impact will have to be assessed over time⁵².

Efficiency

The overall performance of ordinary and administrative courts remains relatively stable. As regards ordinary courts, the estimated time needed to resolve civil, commercial, administrative, and other cases continued to decrease (from 100 days in 2022 to 97 days in 2023), and the opposite trend as regards litigious civil and commercial cases in first instance courts started to reverse (a decrease from 362 in 2022 to 360 in 2023). The rate of solving civil, commercial, administrative, and other cases also started to improve. As regards administrative courts, the rate of resolving administrative cases in first instance significantly improved (from 98% in 2022 to 108% in 2023) and the number of pending administrative cases in first instance decreased⁵³.

II. ANTI-CORRUPTION FRAMEWORK

The perception among citizens, experts and business executives is that the level of corruption in the public sector remains relatively high. In the 2024 Corruption Perceptions Index by Transparency International, Poland scores 53/100 and ranks 20th in the European

to criminal and disciplinary liability. The report concluded that “the Prosecutor's Office from 2016 to 2023 failed to adequately perform its responsibilities.” The President of the Constitutional Tribunal (who was National Prosecutor at the time), called the report defamatory (Constitutional Tribunal (2025e)).

⁴⁸ National Prosecution (2024a). On the investigation see the 2021 Rule of Law Report, Poland, p. 8 fn. 52.

⁴⁹ National Prosecution (2024b).

⁵⁰ The case concerned the initiation, without following the prescribed procedure, of a criminal investigation at the request of the President of the Constitutional Tribunal who considers that a number of high-ranking officials committed a coup d'état (see above). National Prosecution (2025a).

⁵¹ Ministry of Justice (2025d). The tool is expected to become fully operational in designated courts by mid-2026; 7 NGOs (2025), written input, p. 17. See also CCBE (2025), written input, p. 159.

⁵² Prawo.pl (2025a).

⁵³ Figures 4, 5, 9, 11 and 14, 2025 EU Justice Scoreboard.

Union and 53rd globally⁵⁴. This perception has been relatively stable over the past five years⁵⁵. The 2025 Special Eurobarometer on Corruption shows that 55% of respondents consider corruption widespread in their country (EU average 69) and 47% of respondents feel personally affected by corruption in their daily lives (EU average 30). As regards businesses, 41% of companies consider that corruption is widespread (EU average 63) and 19% consider that corruption is a problem when doing business (EU average 35). Furthermore, 46% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 36), while 21% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 33)⁵⁶.

The Polish Government is working to strengthen the legislative framework against corruption. The Government is working to increase the independence of anti-corruption institutions to address risks of politicisation⁵⁷. The draft reform separating the positions of Prosecutor General and Minister of Justice was approved by the Cabinet Standing Committee on 5 December 2024⁵⁸. In December 2024, the Council of Ministers adopted a draft law⁵⁹ on an ‘anti-corruption shield’ to protect the state’s economic interests⁶⁰. It would provide for binding coordination procedures for the police, the Internal Security Agency and the Military Service⁶¹, and it also aims to dissolve the Central Anti-Corruption Bureau, which in the past had given rise to concerns about its independence from the executive⁶². Amended rules for the coordination of prosecution services⁶³ entered into force and a draft legislative act was introduced for Poland’s accession to enhanced cooperation with the European Public Prosecutor Office (EPPO)⁶⁴. Following the confirmation by the European Commission of Poland’s participation in the EPPO⁶⁵, the Council of the EU appointed the European Prosecutor from Poland⁶⁶ and the EPPO’s College appointed 8 delegated European prosecutors⁶⁷. The EPPO is fully operational since January 2025 to investigate and prosecute crimes affecting the Union’s financial interests committed after 1 June 2021, which is expected to facilitate

⁵⁴ The level of perceived corruption is categorised as follows: low (above 79); relatively low (between 79-60), relatively high (between 59-50), high (below 50).

⁵⁵ In 2020, the score was 56, while, in 2024, the score is 53. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (between 4-5 points) and is relatively stable (from 1-3 points) in the last five years.

⁵⁶ Data from Special Eurobarometer 561 (2025) and Flash Eurobarometer 557 (2025).

⁵⁷ Polish Government (2023). 2024 Rule of Law Report, Poland, p. 18, and earlier reports.

⁵⁸ Draft Act amending the Public Prosecutor’s Office Act (UD95), 15 July 2024. Polish Government (2025), written input, p. 1. See also pillar I.

⁵⁹ Chancellery of the Prime Minister (2024). Act on the coordination of anti-corruption activities and the liquidation of the Central Anti-Corruption Bureau, UD46. Batory Foundation (2024).

⁶⁰ I.e. behaviour causing a significant damage to public finance, state-owned enterprises or local governments exceeding approx. EUR 50 000 (Art. 115(7) Criminal Code). Polish Government (2025), written input, p. 13.

⁶¹ Guidelines of the Prime Minister (20 March 2024) already implement the Shield; the bill would make them binding.

⁶² 2024 Rule of Law Report, Poland, p. 16. Bertelsmann Stiftung (2024), p. 11: the Bureau is closely linked to the former government lacking independence. Country visit Poland, Batory Foundation/ Helsinki Foundation, suggesting an ex-ante impact assessment and inclusion into a larger, strategic anti-corruption policy approach for the far-reaching reform.

⁶³ Regulation of the Minister for Justice (7 January 2025) on Rules of Procedure for the internal office of general organisation units of the Public Prosecutor’s Office.

⁶⁴ To implement Council Regulation (EU) 2017/1939 of 12 October 2017.

⁶⁵ See 2024 Rule of Law Report, Poland, p. 13.

⁶⁶ Decision of 12 December 2024; Council of the EU (2024).

⁶⁷ Decision of 16 December 2024; EPPO (2024).

Poland's response to fraud and corruption⁶⁸. Investigative authorities, such as the police and the National Revenue Administration⁶⁹, were provided with new guidelines⁷⁰.

A new Central Office for Combatting Corruption is to be established within the police with a country-wide competence to detect, analyse, prevent and investigate corruption.

The draft bill on the Anti-Corruption Shield⁷¹ aims at transferring the Central Anti-Corruption Bureau's resources and competences, including on corruption to the police, the Internal Security Agency (ABW) and the National Revenue Administration (KAS). Of the Bureau's approximately 1300 full-time officers and 200 civilian employees, a total of 950 officers and all civilian employees are envisaged to be transferred to the police. The new Central Bureau for Combating Corruption will recruit in addition approximately 300 officers and civilian employees from other police units. The KAS will gain 150 full-time positions and the ABW 200 positions. The budget of the Central Anti-Corruption Bureau is planned to be distributed proportionally to the three entities (73% to police, 15% to ABW, 11% to KAS)⁷². The institutional changes envisaged in the legislative proposal adopted by the Council of Ministers is now to be sent to the *Sejm* as the next procedural step before Presidential signature.

Large-scale cases of corruption involving public officials and politicians are being investigated, whereas further efforts are being made to ensure independent and effective investigations and prosecutions with a view to enabling a robust track record of high-level corruption cases⁷³.

The National Prosecutor's Office published a review report of cases of public interest concluded by the prosecution service between 2016 and 2023⁷⁴, including recommendations to address identified irregularities⁷⁵. Large-scale corruption cases involving public officials and politicians are being investigated⁷⁶. The autonomy and cooperation among relevant anti-corruption entities, as well as the access to relevant registries, are considered sufficient for the effectiveness of investigations and prosecutions. The Supreme Audit Office reports that its operations and audit controls have improved⁷⁷. The Parliament commission set up to investigate the activities of high-level public officials, including members of Parliament, issued several corruption-related notifications to the National Prosecutor's Office and regional prosecution offices, which led to the detention of several high-level officials⁷⁸. The

⁶⁸ European Commission Decision 2024/807 of 29 February 2024. This step is welcomed by the Association of Judges and Prosecutors *Iustitia, Themis and Lex Super Omnia* (2025).

⁶⁹ Poland's tax authority.

⁷⁰ Polish Government (2025), written input, p. 12.

⁷¹ Act on the coordination of anti-corruption activities and the liquidation of the Central Anti-Corruption Bureau, UD46.

⁷² Country visit Poland, Ministry of Justice.

⁷³ The 2024 Rule of Law Report recommended to Poland to “[c]ontinue efforts to ensure independent and effective investigations and prosecutions, [...] in order to enable a robust track record of high-level corruption cases.”

⁷⁴ 2024 Rule of Law Report, p. 15: The aim is to address risks of a selective application of the law and disparity in the treatment of corruption cases for political purposes.

⁷⁵ National Prosecutor's Office (2025), review of 200 cases, selected by regional prosecutors and reported by the public, finding significant irregularities in 163 cases. Recommendations include to commence or reopen proceedings, to implement disciplinary or criminal liability against prosecutors. More case review will be presented in a second report.

⁷⁶ Central Anti-Corruption Bureau (2025c) and National Prosecution Office (2025c). On the visa scandal, Polish Government (2025), written input, p. 14. On the university diplomas bribery scheme, Central Anti-Corruption Bureau (2025b).

⁷⁷ Country visit Poland, Supreme Audit Office.

⁷⁸ For the bribe-for-visa case, facilitating the illegal entry into Poland and the Schengen area of over 12 000 immigrants, see Polish Government (2025), written input, p. 14; Notes from Poland (2025).

effectiveness of combatting foreign bribery in practice, although still low, has slightly improved⁷⁹. The Ministry of Justice is working on an amendment of the Act on the liability of collective entities for criminal offences to remove the rule according to which private companies can be held criminally liable for foreign bribery only after a final instance court sentence convicting the natural person(s) involved in the case, or after the termination of the proceedings for other reasons⁸⁰. Against this background, there has been some further progress on this part of the recommendation.

There has been no progress yet on the recommendation to address the broad immunities of top executives and to remove impunity clauses in legislation⁸¹. Immunities cause concern as they act as an obstacle to criminal accountability for corruption committed by top executives outside their official capacity⁸². Previously introduced impunity clauses⁸³ are still in force⁸⁴, yet their use is monitored by the Central Anti-Corruption Bureau. In 2024, they have been applied in 9 proceedings (compared to 10 in 2023)⁸⁵. Such exemptions from criminal responsibility increase the risk of corruption and abuse of political or administrative power, given the lack of deterrence and the perception of impunity. Overall, there has been no progress yet on the recommendation, neither on immunities nor on impunity clauses.

There is no anti-corruption strategy in place. Poland's last anti-corruption strategy and action plan covered the period from 2018-2020. While, as illustrated above, steps to combat corruption have been taken or are planned by the Government, a new strategic, holistic Government approach to corruption is not yet in place⁸⁶. As previously reported, the Supreme Audit Office recommended in its December 2022 report to prepare and adopt such an anti-corruption programme⁸⁷.

There has been no progress to strengthen integrity rules since no rules on lobbying have been introduced⁸⁸. No steps have been taken to oblige persons in top executive functions to fully disclose their contacts with interest representatives in a meaningful and timely manner⁸⁹.

⁷⁹ Polish Government (2025), written input, p. 13, reporting two new investigations. OECD (2024), para. 65.

⁸⁰ 2024 Rule of Law Report, Poland, p. 17.

⁸¹ The 2024 Rule of Law Report recommended to Poland to “[a]ddress the broad scope of immunities for top executives and remove previously introduced impunity clauses in legislation in order to enable a robust track record of high-level corruption cases”.

⁸² 2024 Rule of Law Report, Poland, p. 19. GRECO (2023), paras. 54-63; (2019) paras. 82-91, reiterating its recommendation for an in-depth reform of top executives’ immunities to facilitate corruption prosecution, including by introducing objective criteria for transparent immunity lifting procedures.

⁸³ Exemptions from criminal responsibility (‘impunity clauses’) exist in Art. 305(6) Criminal Code; Law of December 2022 on the abandonment of prosecution relating to the organisation of the presidential elections; April 2022 amendments to Art. 483(1) of the Commercial Company Code Act, abolishing liability of management and supervisory boards for actions to the detriment of the company. Art. 76 of the Law on special support instruments in connection with the spread of SARS-COV-2 virus, adopted in April 2020.

⁸⁴ A bill amending Art. 229(6) Criminal Code on suspects cooperating with the police in return for more lenient sanctions is planned for 2025, but not considered an impunity clause under this recommendation.

⁸⁵ Country visit, Poland, National Prosecutor’s Office.

⁸⁶ Country visit, Poland, Batory Foundation/Helsinki Foundation. OECD (2024), p. 4: lack of a strategy and disinterest, questioning Poland’s commitment. GRECO (2025), para. 59, finding a ‘globally unsatisfactory’ compliance level with recommendations for MPs, prosecutors and judges (8 out of 22), and insufficient compliance for government top executives.

⁸⁷ Supreme Audit Office (2022b) and (2022a).

⁸⁸ The 2024 Rule of Law Report recommended to Poland to “[s]trengthen the existing integrity rules by introducing lobbying rules [...]”.

⁸⁹ Internal guidelines exist only for some ministries since 2006.

There is no information yet on whether the Ministry of Interior’s preparatory work of previous years will provide a basis for future work⁹⁰. Challenges also persist as to the effectiveness of existing lobby registers, with continuing low registration rates, de-registrations and insufficient oversight and enforcement in practice⁹¹. In the *Sejm*, only 6 out of the 14 registered lobbyists have reported lobbying the Parliament in 2024⁹². Therefore, there has been no progress on the recommendation.

There has been limited progress as regards a standardised online system for asset declarations⁹³. The legislative proposal introduced in November 2023 to broaden asset declaration rules is yet to be adopted⁹⁴. As most declarations are still filled out by hand and in a variety of formats⁹⁵, stakeholders have called for a comprehensive reform of the conflict of interest and asset declaration system⁹⁶. The Central Anti-Corruption Bureau, with the support of the Internal Security Agency and the Military Counterintelligence Service, is still submit to the Minister of Interior a draft legal act to regulate the unification, digitisation and control of asset declarations⁹⁷. Meanwhile, to address the low level of digitalisation of politicians’ asset declarations⁹⁸, the Bureau, in cooperation with the Ministry of Digital Affairs and the Central Information Technology Center, is working on a user-friendly IT system for the electronic submission of asset declarations. The Bureau checks the completeness of Senators’ – mostly non-digitalised – asset declarations, while verification tasks remain with the tax authority⁹⁹. Checks conducted by the Bureau also focused on asset declarations submitted by municipal officials and employees¹⁰⁰. Overall, limited progress has been made to have a standardised online system for asset declarations of public officials and Members of Parliament.

The new law on whistleblower protection is in force¹⁰¹. Stakeholders welcomed the law as a first significant step, calling however for a broader material scope¹⁰². A dedicated whistleblower department was established at the Office of the Commissioner for Human Rights to receive whistleblower reports, including on corruption linked to potential breaches of fundamental freedoms, and additional staff was hired. Its budgetary resources were also

⁹⁰ Law of 7 July 2005 on Lobbying defines lobbying, establishes a public register and determines sanctions. The 2018-2020 Anti-Corruption Programme had envisaged a revision of the lobbying law, Council of Ministers Resolution No. 207, 19 December 2017 (M.P. z 2018 r. item 12).

⁹¹ There is a lobby register for the Government, with only 600 entries, one for the lower chamber of Parliament (*Sejm* – with an even lower number of entries) and one for the higher chamber of Parliament (Senate). The Chancellery of the Prime Minister did not report any meetings with lobbyists in 2024; in the Ministry of Interior and Administration in 2024 one lobbying notification was processed, yet no meeting with lobbyists took place according to the Ministry. See also GRECO (2025), paras. 34-36, noting that the scope and enforcement of the rules appearing to apply to top executive functions remain unclear in practice.

⁹² Country visit Poland, Senate Ethics Committee.

⁹³ The 2024 Rule of Law Report recommended to “[s]trengthen the existing integrity rules by introducing [...] a standardised online system for asset declarations of public officials and Members of Parliament.”

⁹⁴ The Bill amending the Act on Restrictions on the Conduct of Business by Persons Performing Public Functions would extend the scope to cover high-level officials and spouses’ property.

⁹⁵ At least 16 different forms are in use; provisions are scattered among several legislative acts. 2024 Rule of Law Report Poland, p. 22.

⁹⁶ Country visit, Poland, Batory Foundation/ Helsinki Foundation for Human Rights.

⁹⁷ Central Anti-Corruption Bureau (2025) to develop a central, integrated, electronic system.

⁹⁸ GRECO (2019), recommendations x and xi, paras. 72 and 78.

⁹⁹ Country visit Poland, Senate Ethics Committee.

¹⁰⁰ Central Anti-Corruption Bureau (2024).

¹⁰¹ Act of 14 June 2024 (UC101), implementing Directive (EU)2019/1937, enforced largely since September.

¹⁰² Polish Institute on Human Rights and Business (2024), p. 33, recommending covering breaches of all laws and internal regulations (Codes of Conducts, by-laws).

increased but are deemed insufficient to effectively examine the high number of reports received (approximately 7 000 in 2024)¹⁰³. The Office refers whistleblower disclosures to the competent authorities. According to prosecutors, such disclosures are an important source of information to detect crimes, including corruption, and an effective whistleblower protection system is instrumental in the fight against corruption¹⁰⁴.

Weaknesses remain in practice in political party financing, but the authorities are starting to address the issue. Challenges persist in the practical application of the 2022 legislation on financing of political parties¹⁰⁵. Publication levels of party finances are not standardised and still vary significantly. Some good practices exist, where filter functionalities are embedded on parties' websites, facilitating the search for specific party finance data¹⁰⁶. The National Election Commission has found irregularities in several party financial reports and rejected one report entirely for breaches of the Electoral Code on grounds of acceptance of unlawful financial benefits¹⁰⁷. Poland is now also engaging with the OSCE/ODIHR, which raised concern on undue influence over the use of state resources and public media and issued recommendations¹⁰⁸. The parliamentary bill of 29 February 2024, which aims to address previously identified systemic transparency challenges relating to clientelist networks around state-owned enterprises (SOE)¹⁰⁹, has passed the *Sejm*'s first reading and the leading Sub-Committee on 20 November 2024¹¹⁰. The Supreme Audit Office expressed the need for audit controls of SOEs¹¹¹, which had been found to circumvent campaign finance rules by exceeding spending limits and undermining the separation of the state and parties and raising questions as to conflicts of interest¹¹².

Public procurement remains an area highly vulnerable to corruption. Businesses' attitudes towards corruption in the EU show that 12% of companies in Poland (EU average 25%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years¹¹³. The Single Market and Competitiveness Scoreboard on access to public procurement in Poland reports a high 54% of single bids for 2023 (EU average 29%). However, 58% of companies perceive the level of independence of the public procurement review body (National Board of Appeal) as very or fairly good¹¹⁴. Following several delays, legislative amendments to the Act on Public Finances have been proposed in March 2025, which stakeholders welcome, indicating however risks of reduced

¹⁰³ Contributing also to legislative proposals and extraordinary tasks (e.g. Ukraine refugee immigration).

¹⁰⁴ Country visit Poland, National Prosecutor's Office.

¹⁰⁵ 2024 Rule of Law Report, Poland, p. 23. Arts. 25, 27 of the Act require parties to publish up-to-date information in the donations and the contracts register. Stakeholders stress the need to test data reliability.

¹⁰⁶ See 2024 Rule of Law Report, Poland, p. 17. Parties' data is published in pdf format or as embedded tables.

¹⁰⁷ Arts. 144(1)(3)(e), 132(5) Electoral Code. National Electoral Commission Resolution, 18 November 2024. See also *Sejm* (2024), Final report of the Committee of Inquiry to investigate the postal voting for the election of the President in 2020 and vote to submit notifications to the prosecution service for alleged crimes that led to charges against a former high-level official on for exceeding his powers.

¹⁰⁸ OSCE/ODIHR (2024c); see also (2024a), p. 1: the lack of requirements for reporting prior to election day, and unregulated third-party campaigning, combined with insufficient campaign finance regulation for the referendum, negatively affected transparency and accountability of political party and campaign finance.

¹⁰⁹ See 2024 Rule of Law Report, Poland, p. 24.

¹¹⁰ By increased transparency requirements and a ban of SOE executives' payments to politicians. *Sejm* Deputies' bill on corporate governance in companies with State Treasury shareholding, Paper no. 261.

¹¹¹ Country visit Poland, Supreme Audit Office.

¹¹² OSCE/ODIHR (2024a), pp. 1-3. The National Election Commission is the oversight body.

¹¹³ Flash Eurobarometer 557 (2025). This is 13 percentage points below the EU average.

¹¹⁴ Figure 59, 2025 EU Justice Scoreboard.

transparency due to high thresholds that would not cover many local government tenders¹¹⁵. Public procurement data, including on large-scale investments, is publicly available, but corruption risk monitoring is still difficult due to scattered data¹¹⁶. The Central Anti-Corruption Bureau's investigations of suspected irregularities relating to EU structural funds, corruption and abuse of public officials' powers in the National Centre for Research and Development¹¹⁷ led to pre-trial investigations and several arrests¹¹⁸. Investigations into alleged bid-rigging and embezzlements pertaining to the Justice Fund, which provides post-penitentiary assistance and support to crime victims, have led to several arrests, pre-trial detention and an arrest warrant for a high-level official, with an estimated damage of more than EUR 50 million (PLN 224 million)¹¹⁹. Stakeholders still consider public procurement as the main corruption risk sector, with potential impacts on investments and business activities.

III. MEDIA PLURALISM AND MEDIA FREEDOM

The Government plans to address persisting concerns regarding the impartiality and independence of the media regulator with a new media law reform. The media regulator – the National Broadcasting Council (KRRiT) – continues to face criticism for its perceived partisan stance, raising concerns among stakeholders as to the regulator's impartiality and independence¹²⁰. The Government plans to introduce stricter eligibility and experience requirements for the regulator's members to address concerns related to the appointment procedures as part of the media law reform implementing the European Media Freedom Act (EMFA)¹²¹. However, some stakeholders consider the proposed changes insufficient, advocating for a more comprehensive reform of the appointment process, including more robust safeguards¹²². Moreover, some stakeholders have raised concerns as to the regulator's discretion in imposing fines on broadcasters for content deemed unlawful and as regards the Chair's prerogatives under the current rules¹²³, questioning the adequacy of the current safeguards¹²⁴. The Polish authorities plan to introduce collegiality into the decision-making process regarding fines, by requiring decisions of the media regulator's Chair to be preceded

¹¹⁵ With approx. 60% below the threshold, country visit, Poland, Batory Foundation. Draft Act Amending the Criminal Code and the Public Finance Act (UD 197).

¹¹⁶ Country visit Poland, Batory Foundation/ Helsinki Foundation.

¹¹⁷ The Centre is an executive agency of the Ministry of the Science and Higher Education.

¹¹⁸ Central Anti-Corruption Bureau (2023). The Supreme Audit Office's control found large scale irregularities confirming corruption risks, see Supreme Audit Office (2023); Science Business (2023).

¹¹⁹ Estimates provided by Ministry of Justice. National Prosecutor Office (2024). European Parliament, (2024).

¹²⁰ International Press Institute and Media & Journalism Research Center (2025), p. 4.

¹²¹ Ministry of Culture and National Heritage (2024), p. 15, as confirmed during the country visit Poland, Ministry of Culture. The concept of new law highlights the importance of Council's members specialised knowledge in media, economics, and law, while stressing the need for independence from political affiliations and influence. The concept of draft law inclines changing one-third of the KRRiT members every two years.

¹²² 7 NGOs and Reporters Without Borders (2025), written inputs, pp. 31-32 and 15 respectively.

¹²³ The 1992 Broadcasting Act, Article 53. According to this provision, fines are imposed by the Chair of the National Broadcasting Council – not by the entire Council collegially. For instance, one of the alerts on the Mapping Media Freedom monitoring report registers the case of the media regulator sanctioning for airing a documentary about alleged wrongdoing linked to Catholic priest and media owner Tadeusz Rydzyk. This fine against TVP follows a similar case in November 2024, when KRRiT fined TVN, Poland's largest private broadcaster, for another critical report on Rydzyk.

¹²⁴ 7 NGOs (2025), written input, pp. 30, 32. Article 18 of the 1992 Broadcasting Act stipulates, *inter alia*, that "programmes may not promote actions contrary to the law, to the Polish *raison d'état* and attitudes and views contrary to morality and social good (...)" and should respect the religious beliefs of the audience, 'and in particular the Christian system of values'. Media Pluralism Monitor (2025), p. 16.

by a resolution of the KRRiT¹²⁵. The media regulator pointed out that its budget only partially covers its needs related to its human resources and constitutional functions, raising concerns about the sufficiency of available funding¹²⁶. The Government intends to evaluate the regulator's financial needs as part of the media law reform¹²⁷.

There has been some further progress to ensure adherence to fair, transparent and non-discriminatory procedures when granting operating licences to media outlets¹²⁸. Whilst no new negative decisions regarding the granting or renewing of licences have been reported since the 2024 Rule of Law report¹²⁹, stakeholders continue to raise concern about gaps in the safeguards of the licencing process and the slow pace of decisions¹³⁰. The Mapping Media Freedom monitoring report has noted a new alert regarding delays in licences renewals¹³¹. As part of the announced reform to implement the EMFA and following a public consultation over the concept of law, the Government plans to introduce a revamped licensing system which would streamline the process and ensure timely decision-making, with a provision keeping the issuance of licences within a clearly defined timeframe¹³². Therefore, some further progress has been made on the recommendation to ensure fair, transparent and non-discriminatory procedures for granting operating licences to media outlets.

Pending new rules to strengthen the independence of the management of public broadcasters' management bodies, there has been a decrease in politically biased media content in public service media. The current management of the major public service media (i.e. Polish Television, Polish Radio and Polish Press Agency) is composed of temporary liquidators¹³³, appointed to oversee public broadcasting entities during the state of liquidation. However, pending the media law reform announced by the Government, standards are assessed by some stakeholders as not sufficient to protect their independence¹³⁴, which amplifies the

¹²⁵ Ministry of Culture and National Heritage (2024), p. 10, as confirmed during the country visit Poland, Ministry of Culture and National Heritage. Under the current provisions, imposing sanctions is a prerogative of the Chair, which may be appealed to a court.

¹²⁶ Country visit Poland, National Broadcasting Council.

¹²⁷ Country visit Poland, Ministry of Culture and National Heritage.

¹²⁸ The 2024 Rule of Law Report recommended Poland to: “[p]ursue efforts to ensure that fair, transparent and non-discriminatory procedures, are adhered to for the granting of operating licences to media outlets ensure that fair, transparent and non-discriminatory procedures are adhered to for the granting of operating licences to media outlets”.

¹²⁹ Country visit Poland, Ministry of Culture and National Heritage; Wirtualna Polska (2024). However, in September 2024, a Warsaw court in Poland has determined that the National Broadcasting Council (KRRiT) mishandled the renewal of TVN24's licence, deeming it a "serious violation of the law". The court also found that the handling of TVN7's licence was improper. As a consequence, KRRiT's Chair, Swirski, was fined PLN 60 000 for failing to extend TVN Style's concession; referring to the decision on renewed licences issued in June 2024, whereas the re-concession process lasted 11 months.

¹³⁰ Media Pluralism Monitor (2025), p. 27.

¹³¹ Mapping Media Freedom (2024) Platform issued on 17 October 2024 alert noting that the media regulator postponed decisions on TVN and Agora broadcasting licences.

¹³² Country visit Poland, Ministry of Culture and National Heritage.

¹³³ The appointment of liquidators followed the decision of the Minister of Culture and National Heritage as the body exercising the ownership rights of the State Treasury over the public service media to dismiss the management bodies of public service media on the basis of the Commercial Companies Code and the liquidation state.

¹³⁴ The decision to liquidate PSM was taken in December 2023 in accordance with the Code of Commercial Companies and the Act on the Principles of Managing State Property. The liquidators may be subject to dismissal at any time and without a clearly defined cause, given their accountability to the Polish state, as represented by the Minister of Culture and National Heritage; Civil Liberties Union for Europe (2025), p. 811.

vulnerability of public service media. In addition, while there has been a notable decrease in polarising and biased content in public service media, some stakeholders have reported that certain bias in reporting political content occasionally persists while impartiality in news programmes has not been achieved¹³⁵, as highlighted also by the Media Pluralism Monitor 2025¹³⁶.

There has been some further progress to ensure an effective legislative framework for the independent governance and editorial independence of public service media¹³⁷. Stakeholders have questioned the independence of the National Media Council (RMN), in charge of appointing public broadcasters' management board members, due to the lack of proper safeguards in the nomination and dismissal of its members, making it vulnerable to undue influence¹³⁸. As part of the reform to implement the EMFA, the Government is preparing a draft law that would dissolve the National Media Council to ensure more coherence in the media regulation landscape and re-entrust the media regulator with the function of appointing public broadcasters' management board members¹³⁹. Moreover, the draft law would include guarantees for the independence of public service media and rules for appointing the governing bodies of public broadcasting companies to ensure their editorial and managerial independence¹⁴⁰. The Government also plans to reform and strengthen the competences of the programme councils of public service media, and to ensure the separation of editorial and management departments¹⁴¹. Overall, some further progress has been made on the recommendation.

Public broadcasters are facing operational instability due to the temporary suspension of licence fee funds, but a new state-funded model is expected. The media regulator temporarily suspended the allocation of public funds collected through the licence fee system in 2024, impacting the operational stability of Poland's major public broadcasters¹⁴². These licence fee funds were held in a court deposit account for part of the year, as a result of the ongoing liquidation of Poland's major public service media¹⁴³. Public broadcasters have initiated proceedings against the media regulator's decision to suspend the allocation of funds¹⁴⁴, leading to payments in some cases¹⁴⁵. Nevertheless, the licence fee system is not considered fully efficient, and state funding is used to offset losses incurred from licence fee

¹³⁵ Country visit Poland, Helsinki Foundation for Human Rights and Stefan Batory Foundation.

¹³⁶ 7 NGOs (2025), written input, p. 34, as confirmed during the country visit Poland by Fundacja Batorego. In addition, as reported by Demagog (2024), a large portion of airtime is still allocated to representatives of the ruling coalition. Media Pluralism Monitor (2025), p. 28.

¹³⁷ The 2024 Rule of Law Report recommended to: “[p]ursue efforts to ensure an effective legislative framework for the independent governance and editorial independence of public service media, taking into account European standards on public service media”.

¹³⁸ International Press Institute and Media & Journalism Research Center (2025), pp. 13-14.

¹³⁹ The provisions on the National Media Council were declared as inconsistent with the Constitution since they deprived the National Broadcasting Council of the powers necessary for that body to carry out its function of “upholding freedom of expression, the right to information and the public interest in broadcasting” (Judgment of the Constitutional Tribunal of 13 December 2016, case no. K 13/16).

¹⁴⁰ Polish Government, written input, p. 19 as confirmed during the country visit by the Ministry of Culture.

¹⁴¹ Ministry of Culture and National Heritage (2024), p. 27.

¹⁴² Except for the licence fee funds released by the National Broadcasting Council to the local PSM following the September 2024 floods in Southern and Western Poland (October 2024 instalment).

¹⁴³ Namely of Polish Television, Polish Radio and Polish Press Agency.

¹⁴⁴ Country visit Poland, Ministry of Culture and National Heritage.

¹⁴⁵ Media Pluralism Monitor (2025), pp. 15-16.

collection¹⁴⁶. As a result, more households stopped paying their licence fees¹⁴⁷. As part of the forthcoming media law reform to implement the EMFA, the Government plans to replace the licence fee system with an annual budget equivalent to a minimum 0.09% of Poland's GDP for public service media¹⁴⁸.

Certain challenges persist in safeguarding media pluralism and editorial independence, particularly in situations involving foreign investment in media ownership. The Media Pluralism Monitor (MPM) 2025 notes the medium-high risk of market plurality with the indicators of high risk of plurality of media providers as well as editorial independence from commercial and owners influence¹⁴⁹. In particular, it reports challenges in balancing state intervention and protection of national security in cases of some media ownership changes, such as takeovers or mergers involving foreign capital. In December 2024, Poland added private broadcasters TVN and Polsat to its list of strategic companies, requiring Government approval for their sale or change of ownership¹⁵⁰. The Government has argued that this measure was essential to safeguard media critical to the state's information security and to ensure the sector's independence and stability amid potential external threats¹⁵¹. The Government further stated that this measure was a temporary solution, pending the implementation of the EMFA. Yet, some stakeholders have expressed concerns over the potential constraints on media pluralism¹⁵² and on the balance between state intervention and protection of national security¹⁵³.

State advertising expenditure has become more evenly spread across multiple media platforms. Currently, there are no established procedures for the allocation of public funds for state advertising¹⁵⁴, and the MPM 2025 reports little transparency. Nevertheless, there are reports of some progress since the 2024 Rule of Law Report with a more even distribution of state advertising expenditure across media outlets¹⁵⁵. The Government intends, as part of the upcoming media law reform, to address the various aspects of state advertising, including transparency, and to address the process of controlling the process of allocating public funds for state advertising¹⁵⁶.

The situation regarding transparency of media ownership improved, while the Government is working on a media ownership database. As part of the market plurality, the MPM 2025 notes that transparency of media ownership reached a medium-low risk level, a decrease compared to the 2024 Rule of Law Report. However, some stakeholders have noted the issue of fragmentation of ownership data¹⁵⁷. In addition, some issues have been reported

¹⁴⁶ Country visit Poland, Ministry of Culture and National Heritage. Public service media are funded through a mix of licence fees, advertising, and direct government funding. International Press Institute & Media & Journalism Research Center (2025), p. 15.

¹⁴⁷ International Press Institute & Media & Journalism Research Center (2025), p. 15.

¹⁴⁸ Ministry of Culture and National Heritage (2024), p. 45, as confirmed during the country visit Poland by the Ministry of Culture and National Heritage.

¹⁴⁹ Media Pluralism Monitor (2025), p. 19.

¹⁵⁰ Council of Ministers (2024b).

¹⁵¹ Prawo.pl (2024).

¹⁵² European Civic Forum (2025), p. 16.

¹⁵³ Media Pluralism Monitor (2025), p. 20.

¹⁵⁴ Country visit Poland, Ministry of Culture and National Heritage.

¹⁵⁵ Media Pluralism Monitor (2025), p. 28; Country visit Poland, Chamber of Press Publishers.

¹⁵⁶ Country visit Poland, Ministry of Culture and National Heritage.

¹⁵⁷ Media Pluralism Monitor (2025), pp. 18-19.

related to the lack of transparency in local media ownership, with stakeholders highlighting uneven level playing field between privately owned local media and those publicly owned by local government authorities¹⁵⁸. The Government is working on a media ownership database as part of the media law reform to implement the EMFA.

The legal framework for access to public information remains stable, though stakeholders report certain challenges with its implementation. This is particularly due to delays in appellate proceedings following refusals or absence of responses to information requests¹⁵⁹. Additionally, authorities may rely on several exceptions which, according to stakeholders, results in inconsistent and restrictive interpretations¹⁶⁰. As highlighted by the MPM, journalists continue to encounter challenges in obtaining public information such as being denied access by press officers at state institutions and experiencing prolonged accreditation procedures¹⁶¹.

The number of SLAPPs has decreased, while the Government continues to work on legislation to address additional challenges affecting the safety of journalists. The number of Strategic Lawsuits Against Public Participation (SLAPP) initiated by national public authorities decreased compared to the 2024 Rule of Law Report¹⁶² and state-owned companies have dropped some lawsuits. However, some new cases have emerged, launched primarily by private entities, individuals and local governments¹⁶³. In the reporting period, the Council of Europe Platform to Promote the Protection of Journalism and the Safety of Journalists has recorded four new alerts concerning Poland. Two of the created alerts concern harassment and intimidation of journalists, respectively, an incident of a journalist denied access to crisis management meetings, and threats against an investigative journalist. The other two alerts concern defamation and insult laws and practice, and journalists fearing a loss of editorial independence as a TV channel reconstructs¹⁶⁴. Moreover, the Mapping Media Freedom monitoring report has noted twenty-one new alerts: nine relating to incidents of interference, eight relating to verbal attacks and four classified as lawsuits and fines¹⁶⁵. At the same time, self-regulatory measures and trade unions are lacking within the journalistic community¹⁶⁶. In January 2025, the Government published a draft law to implement the anti-SLAPP Directive¹⁶⁷.

The use of defamation and insult laws against journalists has been reported to pose additional risks. The Safety of Journalists Platform reports a systemic issue with journalists lacking adequate protection under the current defamation and insult laws¹⁶⁸. According to some stakeholders, the current law on defamation creates additional risks of SLAPPs being used against journalists¹⁶⁹. As part of the law implementing the anti-SLAPP Directive, the

¹⁵⁸ Demagog (2024a), Portal Samorządowy (2025).

¹⁵⁹ Country visit Poland, Watchdog Polska.

¹⁶⁰ 7 NGOs (2025), written input, pp. 31, 37.

¹⁶¹ Media Pluralism Monitor (2025), p. 6.

¹⁶² 7 NGOs (2025), written input, p. 37, as confirmed during the Country visit with the Helsinki Foundation for Human Rights.

¹⁶³ 7 NGOs (2025), written input, p. 37; ENHRI (2025), written input, p. 16.

¹⁶⁴ Council of Europe Platform to promote the protection of journalism and safety of journalists (2025).

¹⁶⁵ European Centre for Press and Media Freedom (2025).

¹⁶⁶ Country visit Poland, Journalists' Society (Towarzystwo Dziennikarskie); Media Pluralism Monitor (2025), p. 7.

¹⁶⁷ Ministry of Justice (2025g).

¹⁶⁸ Safety of Journalists Platform (2024). Defamation (as per Article 212 of the Criminal Code) and insult (under Article 216) are considered criminal offenses, carrying penalties such as fines or community service. When defamation or insult occurs through the media, imprisonment remains a possible punishment.

¹⁶⁹ Safety of Journalists Platform (2024).

Government intends to limit the severity of the penalty for the offence of defamation¹⁷⁰. While stakeholders view the Government's engagement as positive, they consider that this measure would not entirely eliminate the risk of defamation being used as a potential basis for SLAPPs against journalists¹⁷¹.

The Government is working on new rules to protect journalistic sources and confidential communications. Some stakeholders deem the existing rules for the protection of journalistic sources and confidential communications insufficient¹⁷². The Government intends to address these issues in the upcoming media law reform and sees the need to launch inter-ministerial dialogue to find appropriate solutions to address these issues¹⁷³. Building on this momentum, in December 2024 the Polish authorities amended three regulations related to operational control carried out by special services¹⁷⁴. Under the new rules, requests for operational control addressed to the prosecutor's office and courts must be better substantiated and the courts must justify not only refusals, but also authorisations of operational control. However, some stakeholders have called for more comprehensive rules on surveillance¹⁷⁵.

IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES

Poland strengthened the rules governing consultations to improve the quality of legislation. In line with its commitments under the Recovery and Resilience Plan¹⁷⁶, Poland amended¹⁷⁷ the rules of procedure of the *Sejm*, the Senate and the Council of Ministers to introduce a mandatory impact assessment and public consultation for draft laws. While the long-term effects of these reforms will need to be assessed¹⁷⁸, stakeholders¹⁷⁹ consider that the new rules provide them with sufficient time to present their views on draft legislation¹⁸⁰.

On 1 January 2025, Poland had 52 leading judgments of the European Court of Human Rights pending implementation, an increase of 6 compared to the previous year¹⁸¹. At that time, Poland's rate of leading judgments from the past 10 years that had been implemented was at 49% (unchanged from 2024; 51% remained pending), and the average time that the

¹⁷⁰ Prawo.pl (2025c).

¹⁷¹ Gazeta Prawna (2025).

¹⁷² 7 NGOs (2025), written input, p. 36. For instance, in practical terms: Judicial review is limited to cases where journalists sources are presented as evidence in criminal proceedings, rendering this protection limited. The European Court of Human Rights (ECHR) found in the case *Pietrzak v. Poland, Bychawska-Siniarska and Others v. Poland* (June 2024) that the Polish national legislation fails to offer adequate safeguards against excessive surveillance and unwarranted interference with individuals' privacy.

¹⁷³ Country visit Poland, Ministry of Culture.

¹⁷⁴ Council of Ministers (2024c).

¹⁷⁵ Media Pluralism Monitor (2025), p. 37.

¹⁷⁶ 2024 Rule of Law Report, Poland, p. 29.

¹⁷⁷ The new rules of procedures of the *Sejm* entered into force on 1 November 2024, and those of the Council of Ministers on 20 August 2024; Polish Government (2025), written input, p. 23.

¹⁷⁸ According to stakeholders, for the time being the impact of the change is limited with consultations on some 60-75% of draft laws proposed in May-December 2024, and better justification for reducing consultation below 21 days would be desirable; 7 NGOs (2025), written input, pp. 40-41.

¹⁷⁹ In the period November-December 2024, all draft laws proposed by *Sejm* members were subject to public consultation (23); in one case a 30-days consultation period was shortened to 14 days. Before, no public consultations were held. 7 NGOs (2025), written input, p. 4; Polish Government (2025), written input, p. 23.

¹⁸⁰ Country visit to Poland, Ombudsperson. According to the Ombudsperson's office, while the Ombudsperson is provided with adequate time to present views on draft legislation tabled, its recommendations are not reflected in the legislation adopted.

¹⁸¹ For an explanation of the supervision process, see the Council of Europe (2025).

judgments had been pending implementation was 5 years and 5 months (unchanged from 2024)¹⁸². The oldest leading judgment, pending implementation for almost 20 years, concerns excessive length of proceedings before administrative bodies and courts and absence of an effective remedy¹⁸³. As regards the respect of payment deadlines, on 31 December 2024 there were 26 cases in total awaiting confirmation of payments (compared to 18 in 2023)¹⁸⁴. On 16 June 2025, the number of leading judgments pending implementation had increased to 54¹⁸⁵. Upon request of the Polish authorities, the European Court of Human Rights postponed, from 23 November 2024 to 23 November 2025, the examination of cases raising similar problems as in those identified in the pilot judgment in the *Wałęsa v. Poland* case, pending resolution of the systemic problems and adoption of general measures to remedy them¹⁸⁶. It also suspended until that same date the processing of applications submitted in the context of the reorganisation of the judicial system in Poland in the years 2016-2023¹⁸⁷. As mentioned above, in line with its commitments under the Action Plan on the Rule of Law, Poland is preparing a draft law on the implementation of rulings of the European Court of Human Rights¹⁸⁸, which has not yet been tabled to Parliament.

Efforts are made to address instances of abuse of power by public officials. Two out of the three investigative committees established by the *Sejm* finalised their works and reported on the scope of criminal liability of public officials that should be followed up by the prosecution service¹⁸⁹. Before they concluded their work, the Constitutional Tribunal considered two of the investigative committees to be unconstitutional on grounds of their broad mandate and the limited timeframe for their analysis¹⁹⁰. The President of the Republic vetoed the law abolishing the State Committee for the examination of Russian influence on the internal security of Poland between 2007 and 2022, which had already ceased its operations in practice¹⁹¹. Law enforcement agencies followed up on the findings of the Supreme Audit Office¹⁹². Legal professions are functioning well and enjoy a high degree of independence¹⁹³, notably as regards the protection of professional secrecy, the disclosure of which, when requested by prosecutors, is in principle refused by courts¹⁹⁴.

The Ombudsperson continues to fulfil a key role in the system of checks and balances. The Ombudsperson enjoys an ‘A’ status by the UN Global Alliance of National Human Rights

¹⁸² All figures calculated by the European Implementation Network (EIN) and based on the number of cases that are considered pending at the annual cut-off date of 1 January 2025. EIN (2025), written input, p. 7.

¹⁸³ Judgment of the ECtHR, 51837/99, *Beller v. Poland*, pending implementation since 2005.

¹⁸⁴ Council of Europe (2025), p. 157.

¹⁸⁵ Data according to the online database of the Council of Europe (HUDOC).

¹⁸⁶ ECtHR judgment of 23 November 2023, *Wałęsa v. Poland*, 50849/21.

¹⁸⁷ ECtHR (2024).

¹⁸⁸ Draft law UD177 of 23 December 2024; Polish Government (2025), written input, p. 25. See Pillar I, p. 3.

¹⁸⁹ This concerns the investigative committee to examine possible breaches of law by the organisers of the “postal” Presidential elections in 2020 and the investigative committee to examine alleged irregularities in the issuance of Polish visas to foreigners. The investigative committee for the use of “Pegasus” software continues its activities.

¹⁹⁰ Rulings of 6 November 2024 (case U 2/24) and of 10 September 2024 (case U 4/24). The rulings have not been published (see Pillar I).

¹⁹¹ President of the Republic (2024d) who decided to veto the law abolishing the State Committee on 16 August 2024. For the lack of operability of the State Committee see 2024 Rule of Law Report Poland pp. 31-32.

¹⁹² Country visit to Poland (2025), Supreme Audit Office.

¹⁹³ Country visit to Poland (2025), National Bar Council and National Chamber of Legal Councillors. CCBE (2025), written input, p. 156.

¹⁹⁴ According to data presented by the National Bar Council in the context of the country visit to Poland.

Institutions (GANHRI)¹⁹⁵. His annual budget was increased. Nevertheless, the Ombudsperson still considers it suboptimal in view of all the tasks linked to his mandate¹⁹⁶. The Ombudsperson remains committed to promoting a vibrant and pluralistic civic space, where civil society and rights' defenders can do their work freely¹⁹⁷.

Less than half of the companies surveyed in Poland express high levels of confidence in the effectiveness of investment protection. 39% of companies are very or fairly confident that investments are protected by law and courts. The main reasons among companies for their lack of confidence are the frequent changes in legislation or the quality of the law-making process (36%). 73% perceive the level of independence of the national competition authority (Office of Competition and Consumer Protection) as very or fairly good¹⁹⁸. The Government intends to reduce the administrative burden for business and society, focusing on deregulation of commercial and administrative law, creating a task force and, concomitantly, to adopt a draft law to that effect¹⁹⁹. The Supreme Audit Office considers it important to improve public support for business in Poland to optimise the business environment in line with the guidelines contained in government strategies²⁰⁰. A number of judicial mechanisms are in place at the level of the Supreme Administrative Court to ensure the implementation of administrative court judgments, which include the possibility to quash administrative decisions for continued non-compliance with the court's instructions. However, these mechanisms do not include disciplinary actions against the responsible officials or direct enforcement measures²⁰¹.

Some further progress has been made to improve the framework in which civil society operates²⁰². In March 2025, the assessment of the civic space in Poland was updated from 'obstructed' to 'narrowed'²⁰³. The Public Benefit Committee of the Council of Ministers organised special working groups with civil society organisations on matters pertaining to their functioning and intends to reflect their input in future legislation²⁰⁴. Based on the work of the groups, a draft amendment to the Act on Public Benefit Activities and Volunteering was prepared and submitted to the Council of Ministers for consideration. Stakeholders underlined that the engagement with civil society and the improvements to their financing system are still at an early stage, but that the direction is overall good²⁰⁵. A new government program has been launched for small and medium-sized non-governmental organisations in small towns, with a budget of PLN 70 million for 2025. Steps have also been taken to increase the protection against hate crime and hate speech. The Government set up a special Committee to examine

¹⁹⁵ Global Alliance of National Human Rights Institutions (2023).

¹⁹⁶ ENNHRI (2025), written input, p. 3.

¹⁹⁷ Ombudsperson (2024), (2025a).

¹⁹⁸ Figures 54, 55 and 60, 2025 EU Justice Scoreboard. 35% of the surveyed investors perceive the quality, efficiency or independence of justice as a reason for the lack of confidence in investment protection.

¹⁹⁹ Council of Ministers (2025a), (2025b), Prawo.pl (2025b).

²⁰⁰ Supreme Audit Office (2024).

²⁰¹ EU Justice Scoreboard 2025, Figure 49. The information provided reflects exclusively the existing mechanisms in the highest administrative court instance.

²⁰² The 2024 Rule of Law Report recommended to Poland to '[c]ontinue the on-going process to improve the framework in which civil society operates, taking into account European standards on civil society organisations'.

²⁰³ Rating given by CIVICUS. Ratings are on a five-category scale defined as: open, narrowed, obstructed, repressed and closed. Until 2024, the civic space was considered obstructed.

²⁰⁴ Working Group for Simplifying Law as regards the NGOs, Working Group for Activism and Volunteering, and Working Group for Civic Participation and Dialogue. Polish Government (2025), written input, p. 27, the Council of Ministers (2025), NGO.pl (2025).

²⁰⁵ 7 NGOs (2025), written input, pp. 45-48.

alleged attacks against civil society organisations and rights defenders in the past and to come up with recommendations to strengthen the enabling environment for civil society²⁰⁶. At the same time, civil society organisations reported that measures adopted by the Government, while not addressed specifically to NGOs, adversely affected their functioning²⁰⁷. Overall, some further progress has been made to improve the framework in which civil society operates.

²⁰⁶ Ministry of Justice (2025f).

²⁰⁷ The Polish authorities introduced a ban at the Polish-Belarusian border prohibiting entities unauthorised by the State bodies from operating at that border. The Polish authorities justify their actions and restrictions at the border on grounds of national security. Statements made by MPs or members of the Government against NGOs active in the field of environment and migration, gave rise to increasing negative rhetoric against civil society organisations working on those issues. 7 NGOs (2025), written input, pp. 46-47. Helsinki Foundation of Human Rights (2025a), Watchdog Polska (2025), written input, p. 18. Country visit Poland (2025), Helsinki Foundation of Human Rights and Batory Foundation.

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Annex II: Country visit to Poland

The Commission services held virtual meetings in March 2025 with:

- Association of Judges ‘Sędziowie RP’
- Association of Judges ‘Themis’ (Stowarzyszenie Sędziów Polskich Themis)
- Association of Judges and Prosecutors ‘Iustitia’ (Stowarzyszenie Sędziów Polskich Iustitia)
- Association of Polish Journalists (Stowarzyszenie Dziennikarzy Polskich)
- Association of Prosecutors ‘Lex Super Omnia’ (Stowarzyszenie Prokuratorów Lex Super Omnia)
- Batory Foundation (Fundacja Batorego)
- Central Anti-Corruption Bureau (Centralne Biuro Antykorupcyjne)
- Helsinki Foundation for Human Rights (Helsinki Fundacja Praw Człowieka)
- Ministry of Culture and National Heritage (Ministerstwo Kultury i Dziedzictwa Narodowego)
- Ministry of Justice (Ministerstwo Sprawiedliwości)
- National Bar Council (Naczelna Rada Adwokacka)
- National Chamber of Legal Councillors (Krajowa Izba Radców Prawnych)
- National Council for the Judiciary (Krajowa Rada Sądownictwa)
- National Media Council (Rada Mediów Narodowych)
- National Television and Radio Broadcasting Council (Krajowa Rada Radiofonii i Telewizji)
- Office of the Minister of European Affairs (Urząd Ministra ds. Europejskich)
- Ombudsperson’s Office (Biuro Rzecznika Praw Obywatelskich)
- Polish Media Association (Stowarzyszenie Polskich Mediów)
- Prosecutor General’s Office (Prokuratura Generalna)
- Society of Journalists (Towarzystwo Dziennikarskie)
- Supreme Administrative Court (Naczelny Sąd Administracyjny)
- Supreme Audit Office (Najwyższa Izba Kontroli)
- Supreme Court (Sąd Najwyższy)
- Watchdog Polska

* The Commission also met the following organisations in a number of horizontal meetings:

- Amnesty International
- Araminta
- Civil Liberties Union for Europe
- Civil Society Europe
- European Civic Forum
- European Partnership for Democracy
- European Youth Forum,
- International Commission of Jurists
- International Federation for Human Rights (FIDH)

- JEF Europe
- Philea – Philanthropy Europe Association.
- Transparency International