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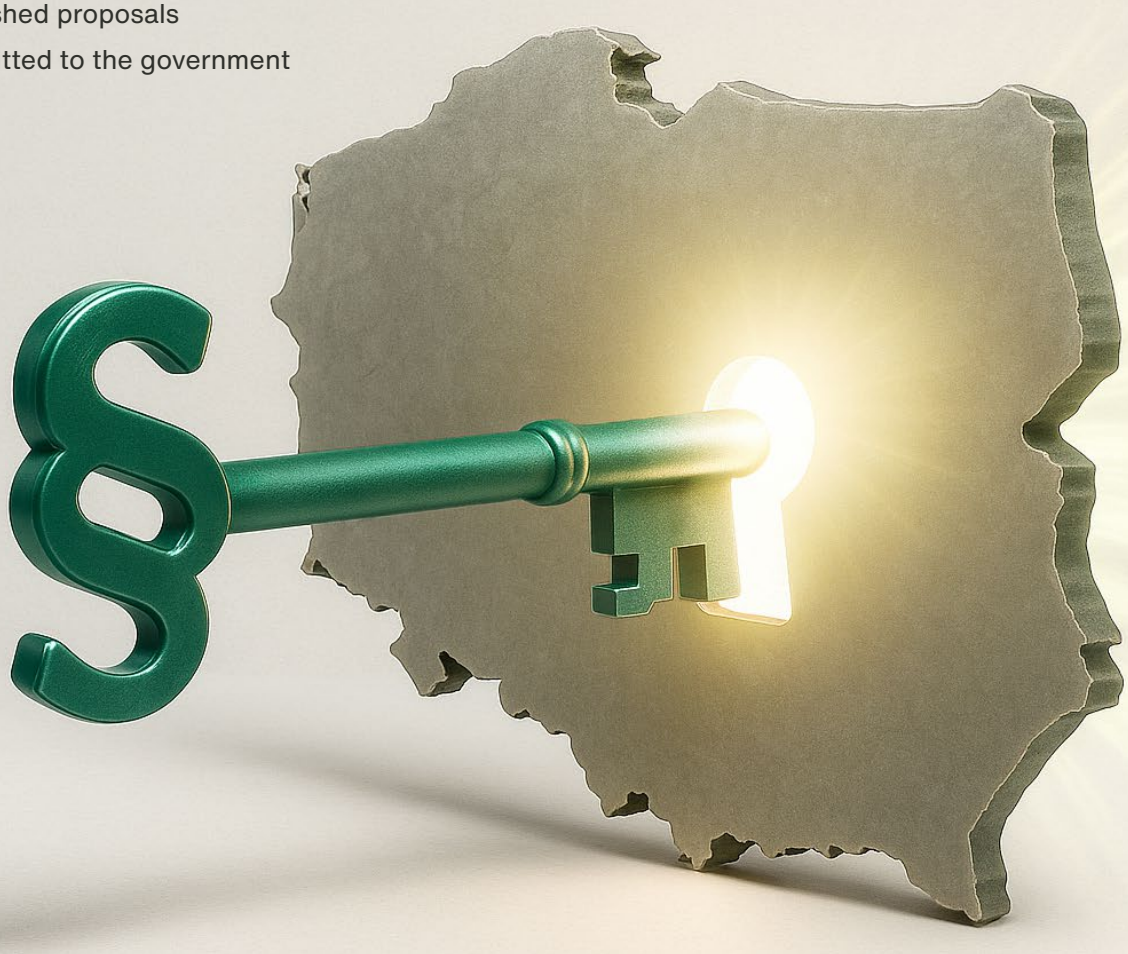
SprawdzaMY

Phase 1.0

Deregulation in action

The first effects of unlocking Poland's economic potential

16,000 ideas from citizens
500 published proposals
487 submitted to the government



SprawdzaMY Report JUNE 2025

Partners of the SprawdzaMY Initiative

BNI | CORPORATE CONNECTIONS | KONFEDERACJA LEWIATAN | Polska Rada Biznesu | PRACODAWCY RP

"Never doubt that a small group of thoughtful, committed citizens can change the world.

Indeed, it is the only thing that ever has."

~ Margaret Mead

AUTHORS OF THE REPORT

BCG, DZP, Entrepreneurship Support Foundation, GWW Legal & Tax, Ibris, Oldman Sage, PwC

REPORT DRAFTED BY

The Entrepreneurship Support Foundation as part of the SprawdzaMY Initiative

AS OF 27.06.2025

Table of Contents

1. Introduction 1
   - 1.1 From the SprawdzaMY Team 2
   - 1.2 The Role and Functioning of the Government Deregulation Team 5
     - 1.2.1 Appointment and structure: Political Coordination Centre 5
     - 1.2.2 Work process: from civic proposal to legislation 6
     - 1.2.3 Efficiency, challenges, and the final form of changes 6
   - 1.3 Steering Committee of the SprawdzaMY initiative 7
   - 1.4 Reporting methodology and the role of partners 10
     - 1.4.1 Expertise from Boston Consulting Group (BCG) 10
     - 1.4.2 The contribution of renowned law firms and consultancies 10
     - 1.4.3 Support for social research from IBRiS 10
     - 1.4.4 Key Role of the Entrepreneurship Support Foundation 10
     - 1.4.5 Why did we choose these partners to develop the Phase 1.0 Deregulation Report? 10
   - 1.5 The SprawdzaMY project in numbers 11
     - Schedule of work on deregulatory proposals according to specific ministries 14

2. On deregulation 18
   - 2.1 Introduction 19
   - 2.2 Deregulation projects around the world 19

3. About SprawdzaMY 22

4. The scale of the SprawdzaMY Initiative 26

5. Main Areas of Phase 1.0 - The Big Seven 30
   - 5.1 Taxes and public finance 31
   - 5.2 Judiciary and administration 31
   - 5.3 Security and defence 32
   - 5.4 Digitisation 32
   - 5.5 EU law 33
   - 5.6 Health and social services 33
   - 5.7 Energy and environment 34

6. Review of Key Proposals within the Big Seven 35
   - 6.1 Taxes and public finance 36
     - 6.1.1 The presumption of innocence of the taxpayer in tax settlements 36
     - 6.1.2 Not charging interest for delay in the event of exceeding 6 months of control 37
     - 6.1.3 Introduction of tax settlements in the relationship between the Citizen and the Tax Office 38
     - 6.1.4 Electronic PITs from employers 39
     - 6.1.5 Simplified debt collection - faster debt recovery for small businesses 40
     - 6.1.6 1% CIT for public benefit organisations - business supports good causes 41
     - 6.1.7 Transition period - an end to sudden tax changes for both citizens and businesses 42

6.2 Judiciary and administration 43
6.2.1 Implementation of the general legal principle «1 new regulation in place of 2 repealed regulations» 43
6.2.2 Change of local jurisdiction - justice where it works faster 44
6.2.3 Rationalisation of the scale of penalties in economic trade - so-called decriminalisation of economic trade. 45
6.2.4 Digitisation of court proceedings 46
6.2.5 Faster verdicts, less bureaucracy - expansion of the existing e-Court›s operations 47
6.2.6 Limiting the abuse of remand detention against citizens 48
6.2.7 The use of the «tacit resolution of the case» institution when authorities exceed the instructional time specified in the regulations 49
6.2.8 Amicable divorce (by mutual consent), without the need to visit the courts 50
6.3 Security and defence 51
6.3.1 Military shooting ranges and noise suppressors - available to civilians, safer and more modern 51
6.3.2 The possibility of deducting from corporate income tax expenses related to security and defence 52
6.3.3 Reform of the targeted subsidy system to cover the costs incurred by entrepreneurs in the implementation of tasks for the Armed Forces 53
6.4 Digitisation and telecommunications 54
6.4.1 Equating the importance of electronic documentation with paper documentation 54
6.4.2 Electronic employment contracts - convenience and safety for employees 55
6.4.3 mObywatel with digital instead of plastic documents - the digital revolution in documentation 56
6.4.4 mPension - all the data about your pension in one place 57
6.4.5 Faster internet access - fewer formalities for operators 58
6.5 EU law 59
6.5.1 AI Act Regulations - AI Competitiveness in Poland 59
6.5.2 Countering the phenomenon of «gold-plating» in the process of implementing European Union law 60
6.5.3 Longer period for companies to adapt to EU requirements in the field of cryptocurrencies 61
6.5.4 Report: Gold-plating and over-regulation in the implementation of EU law into the Polish legal system 62
6.6 Health and social services 63
6.6.1 Digital occupational health certificates - faster, more convenient and without unnecessary bureaucracy 63
6.6.2 End of chaos in doctor registration - one, convenient online queue 64
6.6.3 Abolition of the requirement for periodic examinations for persons with permanent disabilities 65
6.6.4 Access to research results in the mObywatel app 66
6.6.5 SOR overwhelmed? Check it in the app before you set off. 67
6.7 Energy and environment 68
6.7.1 Raising the power limit of PV installations for own use to 500 kW 68
6.7.2 Limitation of the licensing requirement for renewable energy sources - increasing the threshold to 50 MW 69
6.7.3 Easier integration of various energy sources in a single connection (cable-pooling) 70
6.7.4 Let’s unleash connection powers - end the blocking by «dead» agreements 71

7. Co-authors of the Report and Project Partners 72
8. Final Remarks from the SprawdzaMY Team 78
9. SprawdzaMY Team and Supporting Experts 80
10. Partner and supporting organisations 82

1. Introduction

1.1 From the SprawdzaMY Team



Rafał Brzoska
Entrepreneurs' Representative
for Deregulation

The first and crucial stage of the SprawdzaMY initiative has come to an end. Together, we have created a phenomenon that will primarily change what we expect from the state - as citizens, taxpayers, and above all, as entrepreneurs. It will also remodel our relationship with public authorities - so that once again they resemble a partnership. It will eliminate harmful practices and rules, for which - as Poles - we have been waiting for many years, and which, being reconciled with reality, we have come to accept as the norm.

SprawdzaMY - the «MY (WE)» in the name of the initiative was never a coincidence. It was teamwork from the beginning. This aspect should be emphasised in every interview, summary and report that is created after the first hundred days of our work.

This change, which is vital for Poland, and which in fact we refer to as deregulation for short - was an enormous collective duty. Thanks to the work and commitment of several hundred people, working pro bono, it has already become a great collective success. So how did this come about?

We had one fundamental goal, which also became the starting point for all further work. We wanted to first meet the expectations of this single, but exceptional, social group. Not politicians, not business, not trade unions or corporations, but simply Poles.

In my opinion, their expectations were strictly defined. They primarily had the right to expect that deregulation would not become another weapon in Poland›s internal political conflict. And this was achieved. From the beginning - through dozens of meetings, conversations, and interviews - we highlighted and kept ever present the good ideas of each of the political forces. In this way - through determination - we have removed deregulation from the current political dispute. Moreover, it has become one of the few areas where the normally bickering politicians looked in the same direction - towards the future.

Poles want to live and work with greater ease and more efficiently, without unnecessary regulations and bureaucratic absurdities.*On a daily basis, they are fully occupied with their own affairs: work, children, bills, and the businesses they run, and this is not conducive to participation in social movements and initiatives. For many years, they have also been given unfulfilled promises of streamlining and liberating Polish entrepreneurship, and that bureaucratic absurdities affecting many areas of life would be abolished. It thus seemed only too likely that they would lose all hope for real change in this regard. And yet, they showed us trust and commitment. The public support that we have received has been of great value and a real commitment.* ***Over 15,000 submissions, 500,000 votes, and thousands of comments have provided proof that people came to believe in their own agency.*** *Our main way of expressing thanks for this commitment has been absolute transparency. On our website SprawdzaMY.com, it was possible to keep track of the submitted proposals, as well as add to and assess them personally. The experts who were assisting us worked openly, under their own names, proud of their role.*

Poles expected that deregulation would start with issues that affect their everyday lives. And we achieved this as well. We placed the greatest emphasis on the demands for easier access to healthcare, improvements in the functioning of the courts and projects restoring dignity and comfort to the lives of people with disabilities.

Listening to the views of SMEs, we proposed tacit consent in proceedings and improvements to court and administrative mediation. We also did not forget about the Polish craft sector, proposing a modern definition of it and adapting the law to the needs of technological and digital artisan businesses.

We knew that at the end of the day we would be judged not for our willingness or good intentions, but for our effectiveness and results. And they are - dare I say it - really impressive. Our 100-day sprint - as we called it - ***resulted in nearly 500 proposals to enable citizens and entrepreneurs, and authorities and civil servants as well, to function more easily.*** *I know for certain that removing a few hundred barriers, be they merely minor and pointless ones, will be a huge boost to growth of the Polish economy. This is the first social initiative of its kind in free Poland, but I am sure it will not be the last.*

The results of our work will benefit all Poles: citizens, taxpayers, micro and small entrepreneurs, and authorities and civil servants as well. It is they who will say with relief: «It›s faster, easier, more efficient and more transparent!» We - as Poles - are reestablishing our rightful place in our relationship with the state: ***that of*** *a partner, not a supplicant.*

Now the ball is in the court of the political class.

What next? SprawdziMY!



Adam Malinowski
Project Coordinator SprawdzaMY

Phase 1.0 of the «SprawdzaMY - Deregulation for Poland» project proved to be a real test of strength, an organisational revolution, and a race against time for the entire team. ***Today, against the backdrop of many intense months, we can look on it with pride as a huge success.***

The beginning of this journey was a phone call from Rafał Brzoska. It was then that the proposal was made, and a moment later the de facto decision, for me to take the helm of the deregulation project. Work on the basic precepts began immediately. There was dramatically little time - just a few days after the meeting with the Prime Minister at the Stock Exchange. Every day of delay could have seriously undermined the effectiveness of the entire undertaking.

Our first goal was to build a complete organisational framework in just seven days. This meant deciding upon the team, specifying roles and recruitment sources and - contemporaneously - launching computer systems for collecting and analysing data and for ongoing communication. ***In this task, the Entrepreneurship Support Foundation played an invaluable role by enabling us to quickly form a working team and allowing us to use its infrastructure.*** *The biggest problem was to find people in such a short time who would work with one hundred percent commitment for three months, available from Monday to Sunday.*

One of the key challenges of Phase 1.0 was to design a ***robust decision-making model*** *that would keep advisory, executive and supervisory roles separate. We created a unique six-stage «firewall», where each level – experts in the subject matter, project managers, lawyers, the Steering Committee, the trade unions and the Government Team - had specific tasks and areas of responsibility assigned. When selecting experts, we emphasised expertise, ethics and independence from any party or corporate lobbying. This led to the creation of a diverse team well-versed in the subject area, ready to engage in discussions with any party at the political table.*

The initial experiences quickly showed that some proposals were neither feasible nor relevant. ***The introduction of verification mechanisms became crucial:*** *an initial expert assessment, followed by legal filtration, public review (including through citizen comments) and finally a twofold independent evaluation by legal teams, each of which could raise objections and block unacceptable changes. This was accompanied by editorial processes (ensuring the content was understandable for citizens and compliant with the letter of the law), as well as technical processes - publishing, collecting comments and semantic analysis. This entire operational model was built in record time, and today it is what establishes the credibility of the project.*

During the course of our work, we decided to abandon the initial assumption that the project would only be about deregulation for entrepreneurs. ***It quickly became clear that real change had to involve the whole of society - not just large corporations, but above all small and medium-sized enterprises, citizens, employees and users of public services.*** *At the same time, the nature of the proposals themselves changed: from minor amendments to regulations, we moved on to initiatives requiring far-reaching, often systemic, changes to statutes. This represents a fundamental shift and a huge success regarding substantive issues, which exceeded the expectations of many stakeholders.*

A huge and welcome surprise for me was the level of competence of the Government Deregulation Team, consisting of just five people directly appointed by the Prime Minister. Maciej Berek became the leader of this team - a person with a rare set of skills: legal and legislative, combined with an understanding of political and business processes. The team, made up of representatives from the Ministry of Finance, the Ministry of Development and Technology, and the Government Legislation Centre, proved to be a reliable, cooperative partner that took its task seriously. Fears that the project would become merely a «campaigning ploy» gave way to the conviction that this was palpable activity within the government›s «100 days».

Having completed Phase 1.0, I can say with full conviction: most of the objectives have been achieved. ***A project was created that combined technocratic precision, public involvement and political accountability and independence - precisely in that order.*** *We have more phases ahead of us, but we already know that the foundations are solid.*



Jacek Socha
Project Coordinator SprawdzaMY

For ten or more years in public service - first as the head of the Securities and Exchange Commission and later as Treasury Minister - I was on the front line of legislative work. I implemented EU directives and helped to lay the foundations of the Polish capital market. Later, as Vice President of PwC, I looked at the economy from a business perspective. I thought I had seen everything that the Polish administrative authorities had to offer. How wrong I was!

When I joined the deregulation project ***SprawdzaMY as a coordinator and leader of the capital markets team,*** *I did not expect that I would become part of something so revolutionary. My mission was clear:* ***to coordinate cooperation with the government and analyse deregulatory proposals****, assessing their feasibility and chances of implementation by the authorities.*

As part of the project, we created, for the first time in history, a round table of the capital market, to bring together the major market institutions - the Ministry of Finance, the Financial Supervision Authority and capital market organisations. The goal? To work together to devise solutions that would breathe new life into the Polish capital market. We have also reviewed around 40 deregulatory proposals related to this market, which are evidence of constructive cooperation.

We looked well beyond the commonplace notions of ministries and civil servants. We presented the civil servants with proposals that were the fruit of in-depth observation of life and legal regulations. These solutions would have been impossible, and even impracticable, without our unique perspective, and without the public expressing its viewpoint.

I am also extremely impressed by the stance of the ***Government Deregulation Team*** *(GDT) under the leadership of Minister Maciej Berek. The government has opened up to a scale of cooperation that we have never seen before! A broad spectrum of businesses, citizens and every sector of the economy were free to submit their proposals. That represents an absolute breakthrough in society-government relations!*

I want to say most emphatically: the government undertook intense and courageous cooperation with the social partners, delegating a special team for this purpose; moreover, the government agreed to discuss new sets of proposals every week, which right up to the moment of submission were never known to the public authorities. But that›s not all - the GDT adopted and maintained a dazzling pace of work required by the ambitious goal of a 100-day sprint imposed by the SprawdzaMY team.

After a hundred days of this intense sprint, ***the SprawdzaMY team has not ceased in its efforts - we are continuously monitoring the legislative changes the government is making,*** *to ensure that the proposals we developed do not become distorted. I deeply believe that this project will not end after the first phase. There is still much to be done,* ***and the need to continue this initiative into the next stages is obvious.***

I know one thing now: it was worth starting this process and ***we cannot squander this success.*** *The SprawdzaMY initiative is a fascinating example for the whole of Europe - proof that deregulation in Poland can be a* ***groundbreaking step towards modernising the economy and administration across the entire continent.*** *If properly conducted, it has the power to revolutionise many aspects of social and economic life, helping to make Poland* ***more efficient, competitive, and innovative on the international stage.*** *This opportunity simply cannot be wasted.*

1.2 The Role and Functioning of the Government Deregulation Team



1.2.1 APPOINTMENT AND STRUCTURE: POLITICAL COORDINATION CENTRE

The Government Deregulation Team (GTD) was established in a resolution adopted by the Council of Ministers dated 5 March 2025. Its goal is to coordinate changes in regulations to make daily life easier for citizens and entrepreneurs in Poland. The placement of the Team within the Office of the Prime Minister (OPM) and the fact that Minister Maciej Berek, who is also the head of the Council of Ministers Standing Committee (CMSC), took the lead, furnished it with significant political authority from the very beginning. This position of chair gives him the authority to simplify and accelerate work on projects.

In addition to the chair, the team also included other key members of the government: the Minister of Finance, the Minister of Development and Technology, and President of the Government Legislation Centre. This composition underscores its role as a political decision-making centre, whose task is not only to analyse proposals but, above all, to resolve interdepartmental disputes and break through bureaucratic inertia.

Creating this Team was part of a deliberate, dual-track political construction. While the team in the OPM acts as the guardian and legislative executor of the entire process, the second body - the Team for Deregulation and Economic Dialogue at the Ministry of Development and Technology - serves as a formal «dialogue platform» with the business community. This architecture allows the government to demonstrate openness to the voice of the social side on the one hand, and, on the other, to maintain full control over the final shape of the law.





1.2.2 WORK PROCESS: FROM CIVIC PROPOSAL TO LEGISLATION

The appointment of the Government Deregulation Team under the leadership of Minister Maciej Berek seems to be significantly linked to the initiation of the deregulation project SprawdzaMY. Although the government already had advisory bodies dealing with the simplification of the law, such as the Team for Deregulation and Economic Dialogue at the Ministry of Development and Technology, established in March 2024, the key sequence of events indicates a direct connection. The public proposal for cooperation addressed to Rafał Brzoska was made on 10 February 2025, and already on 5 March 2025 the Council of Ministers had established a Team in the OPM. This team was created as a dedicated, central political body aimed at the operational implementation of government cooperation with the social side within the framework of this specific, wide-ranging project.

The key objective is to remove unnecessary regulations, reduce bureaucratic barriers and adapt the law to the realities of everyday social life and the functioning of businesses.

In practice, Minister Berk›s team acts as a gatekeeper and key filter for citizens› demands. During the first 100-day sprint, every week the Team received from the SprawdzaMY initiative packages containing 30 to 40 proposed changes. At this stage, during weekly, several-hour-long meetings of representatives from both sides, a critical, preliminary substantive and fiscal selection was made. Proposals that posed a significant threat to the state budget revenue or were contrary to the government›s overriding policy directions were rejected. This «filter» determined which ideas would actually be forwarded for further analysis in the ministries.

The proposals that passed this stage were directed to the relevant ministries in order to obtain a formal position within a very short timeframe. Next, during regular working meetings, representatives of the ministries (at least at the level of deputy ministers) argued their positions to the social side, represented, in particular, by Rafał Brzoska, Adam Malinowski, Jacek Socha or Attorney Rafał Wojciechowski.

The key element of these meetings was an open and substantive discussion. Both parties - civil servants and representatives of the public - tried to understand each other›s arguments and points of view. It was precisely this dialogue that often led to significant corrections: changes in decisions, refinement of solutions or the development of reasonable compromises.

1.2.3 EFFICIENCY, CHALLENGES, AND THE FINAL FORM OF CHANGES

The high acceptance rate of the SprawdzaMY initiative on the government website (63%) confirms the success of this unique partnership. The government created an open channel for social demands, which built an image of openness, while carefully controlling the legislative product to ensure its compliance with the interests of the state, especially fiscal stability.

Although not all demands could be met - for example, due to budgetary or safety issues - the majority of ministries prepared specific actions. Some changes were implemented through guidelines or regulations, while others were referred to further legislative processes.

The Government Deregulation Team has become a forum for real cooperation between the government and society, leading to specific simplifications in regulations. Its activity has proven that centralisation of the legislative process and strong leadership can significantly accelerate the implementation of changes for the better.



1.3 Steering Committee of the SprawdzaMY initiative



RYSZARD CHMURA
PRESIDENT OF THE COMPANY
(BNI POLAND, CORPORATE CONNECTIONS)



WOJCIECH KOSTRZEWA
PRESIDENT OF THE BOARD OF
THE POLISH BUSINESS COUNCIL



RAFAŁ DUTKIEWICZ
PRESIDENT OF
THE BOARD OF POLISH EMPLOYERS



MACIEJ WITUCKI
PRESIDENT OF
THE LEWIATAN CONFEDERATION



DR N. MED. MAŁGORZATA ADAMKIEWICZ
ENTREPRENEUR, VICE CHAIR OF THE BOARD
OF THE POLISH BUSINESS COUNCIL

The SprawdzaMY initiative is led by the Steering Committee, which is its main decision-making body. The committee, which brings together leaders of leading business and social organizations, acts as a strategic filter for all deregulatory proposals. After an initial analysis and the development of postulates by expert teams, it is the Steering Committee, during its regular meetings, that makes their final substantive assessment, prioritizing those solutions that have the broadest possible positive impact on society and the small and medium-sized enterprises (SME) sector in particular. Its key task is to make the final decision on which of the prepared proposals are sufficiently mature and justified to be officially presented to the Government Deregulation Team. In this way, the Committee ensures that only verified and really important socio-economic demands reach the government side.



THE COMPANY

Ryszard Chmura

President of The Company (BNI Poland, Corporate Connections)

The success of the SprawdzaMY project is proof that when you treat a social initiative like a business project - with a clear goal, budget and professional team - you can achieve the impossible. Corporate Connections has taken on the role of the organizational leader for the entire endeavour. We established a dedicated project team with Adam Malinowski at the helm and engaged 300 industry experts working in sprints, and our Entrepreneurship Support Foundation provided the operational infrastructure.

I am particularly pleased that most of the proposals submitted will help all entrepreneurs, including the SME sector - the true bedrock of the Polish economy. It is precisely the small and medium-sized enterprises, which our organization BNI Polska also represents, that will feel the most positive effects of these changes.

As entrepreneurs, we have fulfilled our part of the agreement with the government - and then some. We have presented nearly 500 excellently described, substantive solutions. Now we are waiting for the government and implementation. If this unprecedented business cooperation with the administration yields real results, we have a ready team and proven tools to continue the transformation of the Polish economy. Because this is what Poland needs - systematic work on simplifying the law, not one-off actions.

The creator and leader of the largest business community in Poland. Responsible for the development of BNI Poland, Corporate Connections, and initiatives supporting entrepreneurship. He created the elite Corporate Connections Polska network for companies with revenues over 100 million PLN. He represents Poland in the global structures of the BNI and CC. Co-organiser of Top Charity (nearly 60 million PLN in 2025), engaged in aiding Ukraine and supporting flood victims. Co-founder of the Smartlink Partners fund. He believes that entrepreneurs are the foundation of the economy and that success can be planned.



Polska Rada Biznesu

Wojtek Kostrzewa

President of the Board of the Polish Business Council

The energy and determination I saw among the entrepreneurs and citizens involved in the SprawdzaMY.com initiative were comparable only to the most pivotal moments in our history - to 1989 or the period when Poland joined the European Union. This time, however, it is not just a Polish impulse - we are dealing with a unique, historic window of opportunity that has simultaneously opened in Poland, Europe and the United States.

I believe that this coincidence gives us the opportunity to boldly reform our regulatory environment and create the foundations for Poland›s prosperity for the next 15-20 years. The work of the Steering Committee has been intense - long meetings on Friday evenings, discussions, analyses, meetings with the Prime Minister and government members - but it has been accompanied by a sense of mission and a genuine impact on the real world.

Today, we are passing the baton in the deregulation relay to the Danish presidency and the European institutions. It is a source of pride to me that the signal for change in Europe came precisely from Poland. I believe that this is just the beginning of the profound change that entrepreneurs and citizens have been waiting for, not only in our country but across Europe.

Entrepreneur and manager with many years of experience in the financial, media and technology sectors. President of the Polish Business Council. Chair of the Supervisory Board of Alior Bank S.A., member of the Board of Directors of Stadler Rail AG, Vice-Chair of the Supervisory Board of ERGO Hestia S.A., member of the Supervisory Boards of Gremi Media S.A. and Pascal Publishing, of which he is also the owner. He sits on the advisory board of the Swiss technology company Squirro AG. He is also a shareholder of the fintech company Billon Group Ltd. Graduate of economics at the University of Kiel (Germany).



PRACODAWCY RP

Rafał Dutkiewicz

President of the Board of Polish Employers

Three months of work on the SprawdzaMY initiative committee has shown me that Polish entrepreneurs are capable, that they keep their word and that, if you set a task before them, they will fulfil it excellently. This period was also a time of exemplary cooperation with the government - a little good will was enough to achieve a synergy effect, from which a real chance emerged to free the economy from its bureaucratic corset. And finally, these three months are a time of restored hope that trust between the authorities and business has been permanently restored, which is essential for the Polish economy to build competitive advantages. There is still much to be done, but the business community remains ready to act.

Graduate of Wrocław University of Science and Technology and the Catholic University of Lublin. During martial law, he was involved in opposition activities as an activist of «Solidarity». In 2002, he became the first directly elected president of Wrocław - he held this office continuously for four terms. For his contributions to the development of science in Europe, he was made - as the first and only Pole - an honorary member of the Academia Europaea, the largest European scientific academy. He is also an honorary member of the American think tank the Atlantic Council, a member of the Board of the Batory Foundation, and the chairman of the Council of the Jan Nowak-Jeziorański College of Eastern Europe. Awarded the Officer›s Cross and the Commander›s Cross of the Order of Polonia Restituta, as well as numerous highest international decorations. Honoured with honorary doctorates from Wrocław University of Science and Technology (2020) and Coventry University (2023). Since April 2023, he has been serving as the president of the board of «Employers of Poland» - the oldest and largest employers› organisation in Poland.



KONFEDERACJA LEWIATAN

Maciej Witucki

President of the Lewiatan Confederation

As a member of the SprawdzaMY initiative team, I consider this project a real opportunity to organise and simplify those regulations that complicate the business reality - something we have also been striving after for years at the Lewiatan Confederation by publishing successive editions of the Black List of Barriers. Substantive approach, a good working pace, openness and effective collaboration - these are the day-to-day realities of the three-month SprawdzaMY initiative. Today we have an exceptionally favourable climate for deregulation and a special opportunity in which the attention of the authorities is truly focused on the needs of business. I particularly value the exemplary cooperation and the strength of the united business community, as well as the constructive dialogue with the administration. However, let us remember that deregulation is a process that does not end, and now above all the continuation of our deregulatory efforts remains necessary - at both the national and European Union levels.

President of the Lewiatan Confederation since 2019, previously the vice-president of the organization from 2006 to 2019. Vice-chair of the Social Dialogue Council, and since 2022 also the vice-president of BusinessEurope - the largest European employers› organisation. Active member of international advisory bodies, including the Business Advisory Council for Ukraine, the Board of Directors of the Atlantic Council, ECFR, GLOBSEC and the Kozminski Academy. Founder and member of the boards of foundations such as the Prof. Bronisław Geremek Centre and Poland-Haiti. A graduate of Poznań University of Technology, he also completed postgraduate studies in France - at École Centrale Paris. He began his professional career at Cetelem Polska and Lukas Bank (president from 2005) and later managed Telekomunikacja Polska and TP Group (from 2006) as well as Work Service S.A. Currently, he chairs the Supervisory Board of Orange and sits on the supervisory boards of Auchan Polska, MAK Ubezpieczenia and Krynica Vitamin.



Polska Rada Biznesu

Dr n. med. Małgorzata Adamkiewicz

Entrepreneur, Vice President of the Board of the Polish Business Council, Member of the Supervisory Board of the Polish Association of Pharmaceutical Industry Employers

Over the past 20 years, the Polish economy has been one of the fastest growing among the major economies of Europe. During this time, our GDP has doubled. This is thanks to Polish entrepreneurs, who generate the overwhelming majority of this GDP, while also providing the largest income tax revenues to the state budget. As entrepreneurs, by building strong, stable companies, we are simultaneously building a strong Polish economy, which translates into a better standard of living in our country. And as entrepreneurs, we know what needs to be improved for this development to be even greater, but we must act together with the government side. Not only at the national level, but also at the level of the European Union, where we have the opportunity to play a leading role, as economically we are already emerging as a leader in Europe today. Europe today is grappling with challenges in the areas of competitiveness and innovation, while also being one of the most over-regulated economic regions in the world, which poses a significant barrier to further growth. Poland now stands before a historic opportunity to become the largest economy in Europe, and in the future - perhaps even in the world. Our potential allows us to successfully build a strong position on the international stage, being a natural leader in the region. I personally believe that our significant commitment to the deregulation project will contribute to creating conditions favourable to the economic development of Poland. As entrepreneurs, we remain apolitical and hope that our proposals to date will be realistically reflected in legislative and administrative actions.

Entrepreneur and endocrinologist. Chair of the Supervisory Board of Adamed Pharma S.A. From 1991 to 2002, she worked at the Endocrinology Clinic of Bielański Hospital in Warsaw. Since 2013, she has been a member of the Supervisory Board of the Polish Association of Pharmaceutical Industry Employers. From 2013 to 2015, she served as a member of the Supervisory Board of Bank PEKAO S.A. Since 2015, she has been the Vice-President of the Board of the Polish Business Council and a member of the Business Council of the Jagiellonian University (2016-2020) and the University Council of the Warsaw Medical University (2019-2020). Since 2024, she has sat on the Supervisory Board of MCI Capital. She was awarded the Gold Cross of Merit by the President of the Republic of Poland (2013) and the Medal of the Century of Regaining Independence (2019). Member of the Steering Committee of the SprawdzaMY initiative.

1.4 Reporting methodology and the role of partners

Drafting a report to summarise the effects of the first phase of the SprawdzaMY project required combining extensive knowledge in data analysis, law and business. From the very beginning, we focused on cooperating with strong partners whose skills and experience complement each other. Thanks to this, we were able to comprehensively analyze economic, legal and social issues.

1.4.1 EXPERTISE FROM BOSTON CONSULTING GROUP (BCG)

Boston Consulting Group (BCG) was responsible for creating a comprehensive systemic diagnosis. Within this framework, the Polish regulatory environment was compared in seven key areas, called the «Big Seven,» with practices in selected countries of the European Union, North America and Asia. Additionally, BCG conducted a detailed analysis of the process carried out by the SprawdzaMY team, including the methodology applied and the organisation of expert work within the 100-day sprint.

1.4.2 THE CONTRIBUTION OF RENOWNED LAW FIRMS AND CONSULTANCIES

Key deregulatory demands[1],, developed by the expert teams of SprawdzaMY in seven priority areas, have been thoroughly analysed, commented on, and described by reputable law firms and consultancies: GWW Legal & Tax, Domański Zakrzewski Palinka (DZP), PwC Poland, and Oldman Sage.

1.4.3 SUPPORT FOR SOCIAL RESEARCH FROM IBRIS

The Institute of Market and Social Research Foundation (IBRiS) provided analytical support in the field of social research. Thanks to the public opinion polls conducted, it was possible to assess the impact of the SprawdzaMY team›s work on the Polish economy, including on the situation of SMEs and citizens.

1.4.4 KEY ROLE OF THE ENTREPRENEURSHIP SUPPORT FOUNDATION

The Entrepreneurship Support Foundation, established by The Company, played a huge organisational role in the entire project. The foundation provided the necessary institutional support for the efficient initiation and coordination of work, organisation of expert teams and management of the process of collecting, analysing and systematising deregulatory proposals submitted by entrepreneurs and citizens. With its help, it was possible to effectively conduct an intensive 100-day sprint, based on the collaboration of the business community, administration and experts.

1.4.5 WHY DID WE CHOOSE THESE PARTNERS TO DEVELOP THE REPORT ON PHASE 1.0 OR DEREGULATION?

The selection of these particular partners was dictated by several key factors: their outstanding and strong reputation, many years of experience in advisory and legislative work, practical knowledge of legal and administrative barriers in Poland and openness to implementing a project with an exceptionally short execution time and high level of complexity. All the partners of the report actively supported the SprawdzaMY team throughout the entire 100-day sprint, participating in consultations, analyses and operations at nearly every stage of the project.

The methodology applied in the report combines several key approaches: comparative analysis, expert team collaboration, legal assessment, public consultations and public opinion research. Thanks to this, a report was created that not only shows where the regulatory issues lie but also proposes specific, feasible solutions. We wrote it with the reader in mind - using simple language, a clear structure and a transparent justification for each recommendation. It is a guide to the first phase of deregulation, which may be helpful for both policymakers and all citizens.

1The list of all deregulatory proposals approved for publication by the Steering Committee, along with the continuously updated statuses of each, can be found on the sprawdzamy.com website under the tab "Ideas submitted".

1.5 The SprawdzaMY project in numbers



Adam Malinowski
Project Coordinator SprawdzaMY

The numbers we present today show more than just the scale of operations - they reflect the intensity, unprecedented dynamics and scope of the project, in which tasks that would normally take years to complete were accomplished in just 100 days.

Nearly 1,200 deregulatory forms, developed by over 600 experts, *thousands of hours of analysis, consultations, verifications, and meetings - this is the result of the team›s work, which from the beginning focused on substantive precision at a pace that meets the real needs of the economy, rather than the rhythm of administrative procedures.*

The scale of these activities has translated into the scope of the project. ***The deregulatory proposals covered as many as 300 legal instruments and were directed to all 19 ministries -*** *which shows that the problem of excessive regulations is systemic, not sectoral. The Ministry of Finance attracted the most attention. 18% of all submissions through the website concerned the tax area. This is a clear signal: simplifying tax law is not just a technical correction, but one of the most important social expectations.*

*The clearest sign that we are heading in the right direction is also the growing social awareness. From the outset, we have collaborated with the research agency IBRiS to have a real insight into social moods, opinions and expectations of citizens at every stage of our work. The results of the latest study show that deregulation is no longer an esoteric subject.****Most Poles see in it a real developmental driver - both for companies and for ordinary citizens.***

And it is precisely this kind of change we were aiming for: substantive, bold, and visible from the perspective of everyday life.

§

300 legal acts

This is the number of different legal acts affected by all the deregulatory changes proposed by the expert teams.

175 proposals

This is the number of deregulatory proposals currently in the draft drafting and general legislative process stage.

1,200 person-hours

Members of the SprawdzaMY team during the weekly Steering Committee meetings worked a total of 1,200 person-hours.

500 hours

Regular meetings of the SprawdzaMY team with the Government Deregulation Team lasted a total of approximately 500 hours.

600 experts

1,185 proposals

Around 600 experts worked across all Expert Teams, and as part of Phase 1.0 of the Deregulation process, they developed 1,185 deregulation proposals.

The oldest legal act that experts proposed to amend:

Code of Administrative Procedure, 1960

Proposed change

"Single instance, faster decisions - a revolution in public administration"

Departure from the principle of dual instance in cases where the decision 100% corresponds to the party's request and there are no other parties involved. This is a break with the rule that has been in effect since 1960.

https://sprawdzamy.com/pomysl/jedna-instancja-szybsze-decyzje---rewolucja-w-administracji-publicznej-id-1512

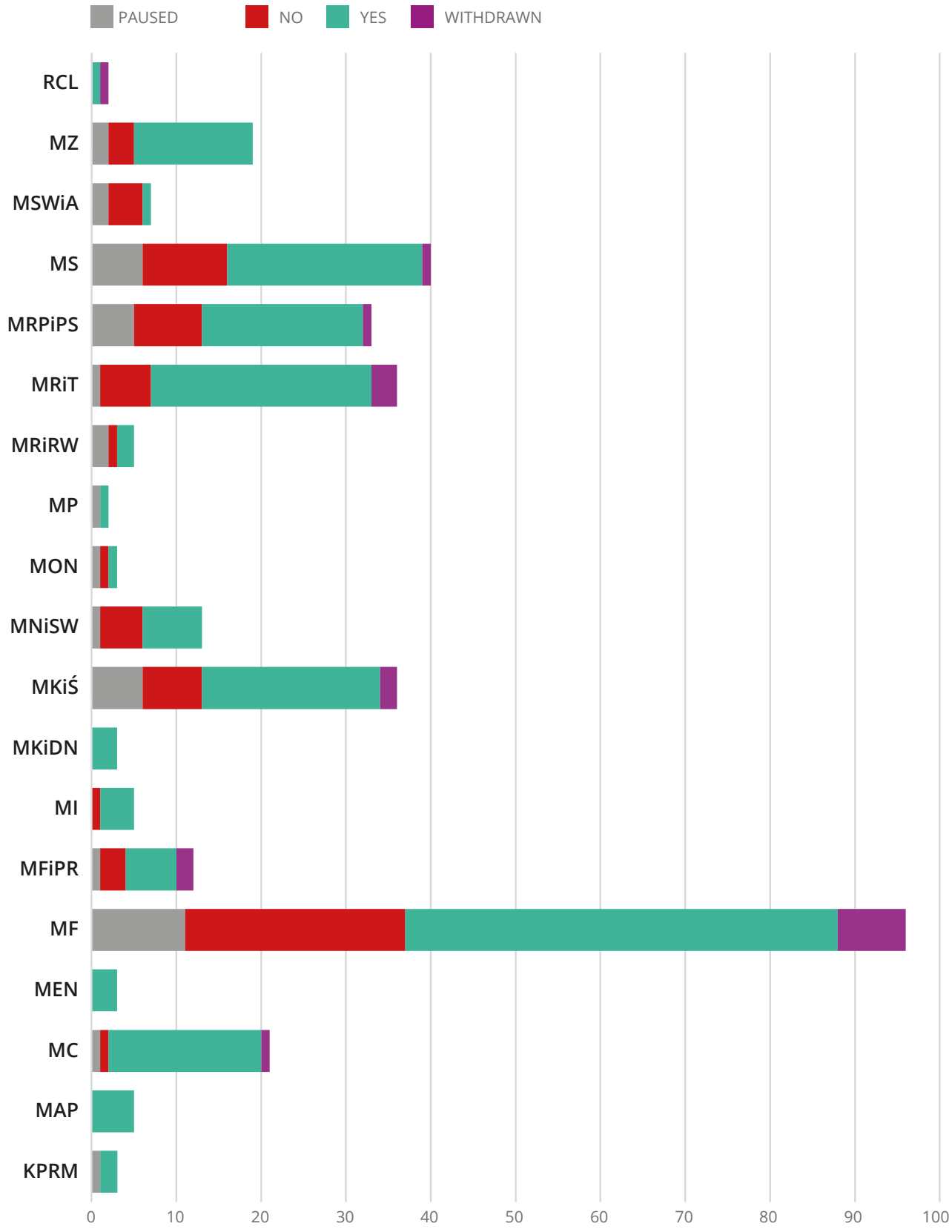
25,576 hours

3,197 days of work

12.8 years

All the experts and members of the support teams spent a total amount of time on the substantive development, legal analysis, and drafting for the publication of all 1,185 deregulation proposals submitted to the SprawdzaMY team as part of Phase 1.0.

SCHEDULE OF WORK ON DEREGULATORY PROPOSALS ACCORDING TO SPECIFIC MINISTRIES



63% of Poles

Thanks to the work of the SprawdzaMY team, nearly 63% of Poles are now aware of what the deregulation process is.

~75% of Poles

Almost 75% of Poles believe that the deregulation project under the SprawdzaMY Initiative will have a positive impact on the situation of small and medium-sized enterprises.

66% of Poles

Over 66% of Poles believe that the deregulation project under the SprawdzaMY Initiative will have a positive impact on the Polish economy.

~62% of Poles

Nearly 62% of Poles believe that the deregulation project under the SprawdzaMY Initiative will have a positive impact on the situation of ordinary citizens.



ibris

according to IBRiS data from 06.06.2025

Through the SprawdzaMY website, the team has received over 16,000 deregulatory ideas.

Many of them were repeated in the submissions of different people, which indicates the importance of the problem in question. Among the most frequently recurring ideas were notably the following:

CITIZENS' IDEA

Facilitating the circulation of electronic documents in the economy

EXPERTS' PROPOSAL

Equating the importance of electronic documentation with paper documentation

STATUS

ADOPTED BY THE GDT

EXPERTS' PROPOSAL

mObywatel with digital instead of plastic documents - the digital revolution in documentation

STATUS

ADOPTED BY THE GDT

EXPERTS' PROPOSAL

E-bill of exchange - digital revolution in finance

STATUS

PAUSED BY THE GDT

EXPERTS' PROPOSAL

Integration of existing administrative systems in citizen services

STATUS

ADOPTED BY THE GDT

EXPERTS' PROPOSAL

Identification of further services that can be transferred to the mObywatel application.

STATUS

ADOPTED BY THE GDT

CITIZENS' IDEA

Exemption of small businesses from reporting obligations to the Central Statistical Office

EXPERTS' PROPOSAL

Fewer formalities thanks to the Central Statistical Office using data from the Social Insurance Institution

STATUS

ADOPTED BY THE GDT

ADOPTED BY THE GDT

The Government Deregulation Team, in cooperation with the Ministry, has adopted an initiative for implementation. Further work on the submitted documentation is underway, with the aim of forwarding it to the Chancellery of the Prime Minister.

PAUSED BY THE GDT

The initiative requires further clarification; it is not ready to be adopted. Clarifications are ongoing with the team of experts and further work is being carried out by the SprawdzaMY team.

CITIZENS' IDEA

Simplification of official procedures through automatic acquisition of documents.

EXPERTS' PROPOSAL

Automatic update of data from the PESEL register - fewer formalities for all bank customers

STATUS

ADOPTED BY THE GDT

EXPERTS' PROPOSAL

Fewer formalities and faster death registration thanks to electronic death certificates

STATUS

ADOPTED BY THE GDT

EXPERTS' PROPOSAL

Faster and more reliable tax settlements thanks to automatic reporting of vehicle data

STATUS

ADOPTED BY THE GDT

CITIZENS' IDEA

Deregulation of the obligation to issue receipts in shops.

EXPERTS' PROPOSAL

Electronic fiscal receipts, i.e., e-receipts - their gradual introduction into circulation

STATUS

ADOPTED BY THE GDT

CITIZENS' IDEA

Change in office working hours for better accessibility.

EXPERTS' PROPOSAL

Offices open longer - handle your matters without taking time off work!

STATUS

ADOPTED BY THE GDT

CITIZENS' IDEA

Allowing electronic employment contracts to increase labour market flexibility.

EXPERTS' PROPOSAL

Electronic employment contracts - convenience and safety for employees

STATUS

ADOPTED BY THE GDT

ADOPTED BY THE GDT

The Government Deregulation Team, in cooperation with the Ministry, has adopted an initiative for implementation. Further work on the submitted documentation is underway, with the aim of forwarding it to the Chancellery of the Prime Minister.

PAUSED BY THE GDT

The initiative requires further clarification; it is not ready to be adopted. Clarifications are ongoing with the team of experts and further work is being carried out by the SprawdzaMY team.

2. On deregulation

Drafted by:

BCG

2.1 Introduction

Deregulation is an initiative aimed not only at simplifying the law and reducing bureaucracy, but also at proposing developmental actions to create a business-friendly legal and economic environment.

Deregulation brings tangible benefits for citizens and entrepreneurs, such as easier business management, faster administrative decisions, fewer unnecessary formalities and lower company operating costs. Simple and transparent law also means greater trust in the state and more space for innovation.

2.2 Deregulation projects around the world

Deregulation projects have already been carried out in many countries. The first deregulatory movements appeared in the United States in the 70s and 80sof the 20th[2] century, under the administrations of Presidents Jimmy Carter and Ronald Reagan, as a response to the economic crisis and growing dissatisfaction with excessive legal regulations. They were particularly visible in air and rail transport, as well as in the financial and telecommunications sectors, where state control began to be limited in favour of greater market competition. Deregulation initiatives also took place in the 21st century not only in the USA, but also in the United Kingdom, Germany, Japan, Canada and Australia.

In the United States, deregulatory initiatives have been conducted by various presidential administrations and have covered a wide range of topics. In 2001, the administration of George W. Bush[3] launched the Regulatory Reform Initiative, engaging 17 federal agencies, which at that time received as many as 71 public nominations[4]. These actions focused on regulations related to food, work, the environment and transport. In 2011, the Barack Obama[5] administration conducted a Retrospective Review of Regulations, during which it gathered over 3,100 comments in the course of public consultations - an average of 444 per agency - with analysed areas including the environment, transport, health and occupational safety. In 2017, President Donald Trump[6] introduced the «two-for-one» rule, which required the elimination of two regulations for every new one. The initiative was met with enormous interest - the Environmental Protection Agency (EPA) received 460,000 comments from fields such as environment, energy, finance, health and transport. In the second term of President Donald Trump, in 2025[7], deregulation has taken the form of executive orders and focused on areas such as the judiciary, administration, health, migration and the environment.

In the United Kingdom, deregulatory actions have been systemic and often associated with savings for businesses. In 2011 and 2013, the «one in, one out» and «one in, two out» rules were introduced, [8]which required the removal of existing regulations when introducing new ones. The process was conducted in cooperation with the business sector and mainly concerned regulations in that area. In 2011, the Bureaucracy Reduction Challenge was launched [9] - a crowdsourcing initiative through which 6,500 regulations were analysed, primarily in the areas of occupational health and safety, environment, construction, commerce and gastronomy. In 2015, another regulatory review programme was launched[10], also involving public opinion and sectoral consultations, which covered, in particular, social care, agriculture, energy and mining.

2https://regulatorystudies.columbian.gwu.edu/brief-history-regulation-and-deregulation

3https://georgewbush-whitehouse.archives.gov/omb/legislative/testimony/graham/111704_graham_reg_reform.html#:~:text=treated%20as%20,the%20rulemakings%20nominated%20for%20reform

4"Public nominations" are proposals submitted by members of the public - from industry groups and trade associations, through advocacy organisations, to individual citizens

5https://obamawhitehouse.archives.gov/the-press-office/2011/01/18/executive-order-13563-improving-regulation-and-regulatory-review#:~:text=Executive%20Order%2013563%20,promote%20retrospective%20analysis%20of; https://www.brookings.edu/articles/assessing-regulatory-retrospective-review-under-the-obama-administration/#:~:text=The%20initial%20set%20of%20agency,To; https://obamawhitehouse.archives.gov/sites/default/files/lookback_report_rev_final.pdf#:~:text=that%20sell%20their%20products%20abroad,initiatives%2C%20already%20finalized%20or%20formally

6https://www.epa.gov/sites/default/files/2018-08/documents/reg_reform_taskforce_20180817.pdf#:~:text=agency%20opened%20a%20publi%20c,nearly%20a%20dozen%20public%20meetings; https://www.brookings.edu/articles/examining-some-of-trumps-deregulation-efforts-lessons-from-the-brookings-regulatory-tracker/; https://www.cato.org/regulation/summer-2020/deregulation-under-trump

7https://www.theregreview.org/2025/05/05/president-trumps-first-100-days-of-deregulation/

8https://www.gov.uk/government/speeches/deregulation-and-economic-growth-priorities-for-government-reform#:~:text=Challenge%20www,further%20savings%20not%20yet%20quantified; https://assets.publishing.service.gov.uk/media/5a79682f40f0b63d72fc58df/11-p96a-one-in-one-out-new-regulation.pdf

9https://ec.europa.eu/docsroom/documents/13183/attachments/1/translations/en/renditions/native; https://www.gov.uk/government/news/government-red-tape-blitz-to-boost-business-growth#:~:text=b,Tape%20Challenge%20so%20far%20include

10https://lordslibrary.parliament.uk/research-briefings/lln-2017-0041/#:~:text=Between%202015%20and%202017%2C%20the,has%20been%20speculation%20as%20to; https://researchbriefings.files.parliament.uk/documents/LLN-2017-0090/LLN-2017-0090.pdf#:~:text=Parliament%20researchbriefings,consultation%20with%20businesses%2C%20soliciting

In Germany, deregulation has been based on cooperation with experts and industry representatives. In 2006, the Bureaucracy Reduction and Better Regulation Programme was launched[11] , aimed at reducing the administrative costs of businesses by 25%. The initiative included, among other things, taxes, finance, labour, social insurance and licensing. Since 2015[12] , the «one-for-one» rule has also been implemented, along with laws limiting bureaucracy, conducted in dialogue with industry organisations, which focused on eliminating unnecessary administrative requirements for small and medium-sized enterprises.

In Japan, deregulatory actions were expert and sectoral in nature. In 2001, the government of Prime Minister Jun'ichirō Koizumi[13] launched the Regulatory Reform Programme, under which the private sector, in cooperation with dedicated teams, prepared numerous reform proposals in areas such as healthcare, education, the labour market, spatial planning and environmental protection. In 2013, Prime Minister Shinzō Abe[14] continued these efforts, focusing on taxes, agriculture, healthcare, labour, energy and the environment.

In Canada, deregulation efforts were conducted both at the federal government level and in close cooperation with entrepreneurs. In 2004, the Administrative Burden Reduction Initiative was launched[15] , aimed at maximising the reduction of documentation, primarily in the areas of taxes, wages, business registration and trade. In 2011, the Bureaucracy Reduction Commission was launched[16], which organised 15 roundtables with the participation of over 200 stakeholders and gathered hundreds of ideas through an online portal. The programme included facilities for businesses concerning taxes, wages, employment, transport and trade, as well as areas such as the environment, health and safety.

In Australia in 2005, a Regulatory Task Force was established[17] , which collected over 150 submissions from organisations and citizens, focusing on taxation, employment, trade, the environment and many other areas. In 2014, the so-called Repeal Days began[18], aimed at removing unnecessary regulations from a wide range of areas. During one of them[19], changes and updates were introduced in many laws concerning agriculture, communication, defence, environment, industry, education, social services and finance, removing outdated references and simplifying regulations.

In Poland, several attempts at deregulation have also been undertaken. For instance, the reforms initiated by Minister Jarosław Gowin in 2013 deregulated around 250 professions, eliminating licences and formal barriers, consequently facilitating access to professions such as taxi driver, real estate agent or lawyer.[20]The package of 100 changes for businesses initiated in 2016 introduced a series of administrative and tax simplifications for entrepreneurs, facilitating, among other things, business registration, official control and business succession.[21]Both initiatives concerned narrow areas and their scale was limited, which meant that the issue of overregulation was still salient. In February 2025, another, more comprehensive, initiative was launched: SprawdzaMY. Despite being at an early stage, the initiative is attracting considerable interest, as so far citizens have submitted over 16,000 ideas, based on which as many as seven broad areas have been identified where deregulation is most needed - from taxes, public finances, judiciary and administration, through security and defence, digitisation, EU law, health and social services, to energy and the environment.

11https://www.bundesregierung.de/resource/blob/998452/369906/cde908eeaebfcf67368767ec24cd2cea/2013-07-29-jb-2011-en-data.pdf?download=1#:~:text=In%20its%20Programme%20for%20Bureaucracy,end%20of%202011%2C%20the%20annual

12https://www.bmwk.de/Redaktion/EN/Dossier/cutting-bureaucracy.html

13https://www8.cao.go.jp/kisei/en/020329program/summary.html#:~:text=2001%20April

14https://www.cfr.org/backgrounder/abenomics-and-japanese-economy#:~:text=In%202014%2C%20Abe%20announced%20a,and%20initiatives%20to%20overhaul

15https://epe.lac-bac.gc.ca/100/202/301/small_business_quarterly/2010/v12n01.pdf#:~:text=Small%20Business%20Quarterly%20,paperwork%20burden%20on%20small; https://www.statcan.gc.ca/en/about/rbre/pbri-report

16https://www.canada.ca/en/government/system/laws/developing-improving-federal-regulations/requirements-developing-managing-reviewing-regulations/red-tape-reduction-action-plan.html

17https://www.bca.com.au/giant-step-on-red-tape-reinforces-pressure-on-states#:~:text=Giant%20Step%20on%20Red%20Tape,Report%20of%20the%20Taskforce; https://www.pc.gov.au/research/supporting/regulation-task-force/submissions#:~:text=Submissions%20,22%2F11; https://d3n8a8pro7vhmx.cloudfront.net/bca/pages/2574/attachments/original/1531463407/submission_to_the_taskforce_on_reducing_regulatory_burdens_on_business_attachmenta_specificregulatory-issues_12-12-2005.pdf?1531463407#:~:text=1%20Regulation%20Taskforce; https://www.pc.gov.au/research/supporting/regulation-taskforce

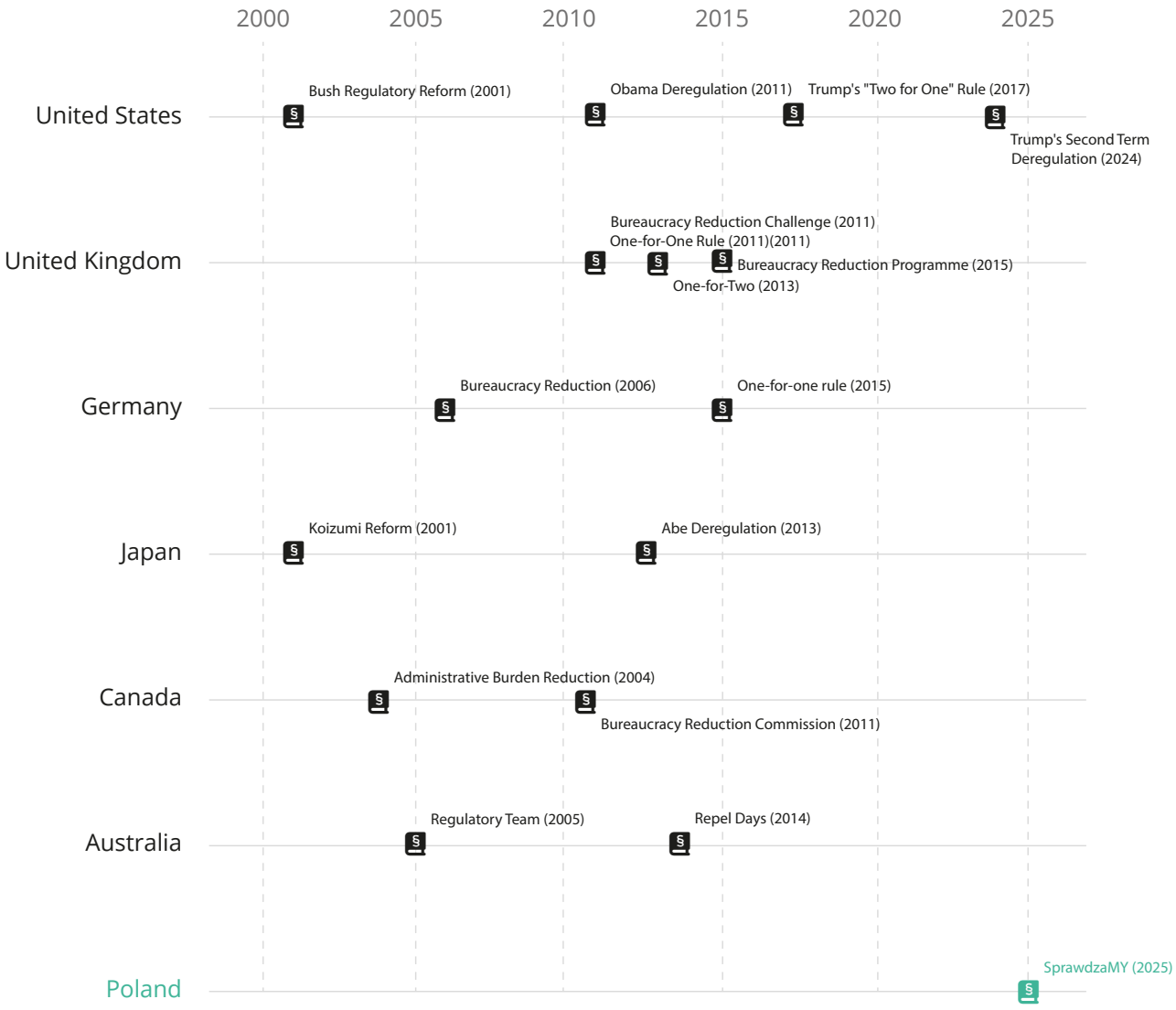
18https://www.innovationaus.com/oh-for-joy-repeal-days-are-repealed/

19https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bId=r5199

20https://www.bankier.pl/wiadomosc/MS-dotychczas-deregulacja-objela-lacznie-247-zawodow-3366078.html; https://osrodkipomocy.ms.gov.pl/pl/deregulacja-dostepu-do-zawodow/i-transza/lista-zawodow/

21https://mf-arch2.mf.gov.pl/documents/764034/5123672/100_zmian_dla_firm.pdf

DEREGULATION PROJECTS ACROSS THE WORLD IN THE 21ST CENTURY



Although Poland is still at an early stage of the deregulation process compared to other countries, the SprawdzaMY initiative stands out due to its broad social engagement - the project has actively involved entrepreneurs, business organisations and citizens, who were not engaged in many other countries. It is also distinctive for the enormous number - for such a short duration of the project (100 days) - of submissions of ideas for deregulation, which relate to many areas.

Deregulation offers an opportunity for numerous facilitations and above all, time and money savings for both Polish citizens and entrepreneurs, as has been proven by other countries that have already deregulated their legal systems. The deregulation initiative in the United Kingdom in 2011 led to the implementation of a package of labour reforms, the impact of which was estimated to save employers around 40 million per year in costs.[22]Meanwhile, the programme introduced in Germany in 2015 reduced administrative requirements and facilitated the operations of over 3.6 million businesses.[23]Poland also has the opportunity to benefit from such and other advantages stemming from deregulation.

22https://ec.europa.eu/docsroom/documents/13183/attachments/1/translations/en/renditions/native
23https://www.bmwk.de/Redaktion/EN/Dossier/cutting-bureaucracy.html

3. About SprawdzaMY

Drafted by:

BCG

During the conference «Poland. Breakthrough Year»,[24] which took place on 10 February 2025, Prime Minister Donald Tusk emphasised that one of the key challenges facing Poland is bold and effective deregulation. In his speech, he emphasised that an excess of regulations, overly complicated procedures and bureaucracy hinder the development of entrepreneurship, limit innovation and frustrate citizens. Prime Minister Donald Tusk announced that the reforms in this area will not be superficial, but systemic and profound and he proposed to Rafał Brzoska - entrepreneur, founder and CEO of InPost, to create a team that would prepare recommendations for deregulatory changes. A week later, on 17 February 2025, Rafał Brzoska, in his role as the Plenipotentiary for Entrepreneur Deregulation, launched the social initiative SprawdzaMY together with supporting organisations.

A large group of volunteers, including over 2,000 people through the sprawdzamy.com website alone, have declared their readiness to actively engage in deregulatory activities within the SprawdzaMY initiative. Also, through this website, anyone could submit their deregulation idea using a simple form. In this way, the Team SprawdzaMY has already received over 16,000 ideas from citizens. As the project developed and ideas were analysed, key areas of work emerged:

- TAXES AND PUBLIC FINANCE
- JUDICIARY AND ADMINISTRATION
- SAFETY AND DEFENCE
- DIGITISATION
- EU LAW
- HEALTH AND SOCIAL SERVICES
- ENERGY AND ENVIRONMENT

24https://deregulacja.pl/deregulacja-czescia-planu-polska-rok-przelomu/; https://bank.pl/prezes-inpostu-o-skierowanej-do-niego-propozycji-premiera/

It is worth noting, however, that the SprawdzaMY initiative team focuses on two of the three stages of the deregulation process: the conceptual stage - the initial stage of collecting ideas and preparing proposals - and cooperation with the Government Deregulation Team, where the submitted proposals are discussed. The proposals accepted by the GDT for implementation are directed to the relevant ministry, where the preparation of a new legislative act begins.

THE LEGISLATIVE PROCESS AND STAKEHOLDER ENGAGEMENT

Preparation of projects based on proposals, consultations and their subsequent legislation.



The task of the Team SprawdzaMY is to analyse problems, prepare deregulatory proposals and present them to the government side, specifically to the Government Deregulation Team. It is this team, under the leadership of Minister Maciej Berek, in cooperation with the Government Legislation Centre and the relevant ministries, that bears the responsibility for the further processing of the proposals. After the pre-legislative stage, the government decides which proposals will be turned into draft laws or other legal acts. Next, the full legislative path will be initiated: preparation of the draft, inter-ministerial consultations, consultations and opinions, adoption by the Council of Ministers and referral of the document to Parliament and then to the President of the Republic of Poland, with the Team SprawdzaMY monitoring the entire process. Despite focusing on the pre-legislative stage, the Team SprawdzaMY has launched an internal process for monitoring legislative projects developed based on deregulation proposals. Legislative projects originating from deregulatory proposals are identified and then the team contacts the SprawdzaMY experts who developed the specific idea as a call on the so-called deregulation form. The emphasis of this process is placed on verifying whether the legislative projects developed by the government side correspond to the original intentions of the authors of specific proposals.

DEREGULATION WITHIN SPRAWDZAMY - STEP BY STEP

Preparation of projects based on proposals, consultations and their subsequent legislation.

CONCEPTUAL STAGE

1. Ideas from the website www

The ideas submitted through www.SprawdzaMY.com undergo an initial analysis using a proprietary AI model - they are compared and grouped (some of them address the same issues).

2. Preliminary verification

Filtered and grouped ideas are sent to teams of experts in thematic or industry divisions.

3. Expert assessment

Experts analyse and evaluate ideas, confronting assumptions with available data and assessing the impact of potential changes on citizens and entrepreneurs, but also on the correlation with other regulations. They identify those that are feasible to implement (including those permissible under international laws) and can lead to positive social and economic change. Besides the ideas submitted through the website, a significant source of proposals in the SprawdzaMY Initiative are the expert groups organised into expert teams themselves. Teams are composed of experts, practitioners, representatives of industry organisations, lawyers in the field, legislators, analysts. The coordination of their activities is the responsibility of a team of project managers (within the so-called PMO - Project Management Office).

4. Development of final recommendations

Experts are developing specific deregulatory demands based on the ideas submitted and their own proposals, recording them on a special form. The form requires, among other things, a detailed description of the problem, proposing a solution, assessing the impact of the change, the complexity of the implementation process, and indicating potential negative effects for individual social groups.

5. Legal analysis

The legal team, as part of a weekly sprint, reviews the received forms in terms of their content, compares the assumptions with available data, and assesses the impact of potential changes on citizens, as well as their correlation with other regulations.

6. First Steering Committee

The experts' calls are discussed by the Steering Committee, which deals with the analysis and assessment of deregulatory proposals submitted in a given week by expert teams during weekly meetings. Here sit the members of business organisations and social organisations.

7. Public consultations

The proposals discussed by the Steering Committee are also reviewed by trade union organisations and Expert Councils, and then - those that are accepted - are published weekly on page, where they are subject to general voting, comments, and discussion.

8. Second Steering Committee

The legal team of SprawdzaMY is re-verifying the ideas published during the week. Subsequently, the Steering Committee makes decisions on their referral to the Government Deregulation Team.

COOPERATION WITH THE GOVERNMENT DEREGULATION TEAM

9. Working sessions with the Government Deregulation Team

The SprawdzaMY team meets weekly with the Government's Deregulation Team to jointly discuss subsequent sets of demands. These are drafted in the form of ready-made legislative change proposals and in this form, they are passed on to the government side. The government team accepts, rejects, or holds selected demands.

- accepted proceed to the legislative stage,
- rejected or paused, they return to the experts, who address the government's objections and appropriately update their demands. Then, they are discussed again at subsequent meetings with the Government Deregulation Team.

LEGISLATION

10. Drafting of a bill or regulation

Legislative change projects are monitored and recorded in a database maintained by a team of project managers, and their compliance with the SprawdzaMY proposals is verified directly with experts. Official comments are submitted during public consultations if necessary.

11. Regulation or act

All projects implementing the SprawdzaMY proposals are further monitored and analysed at every legislative stage and checked to see if they precisely implement the original idea. Each stage of every proposal within the legislative path is monitored and updated in real time on the SprawdzaMY website.

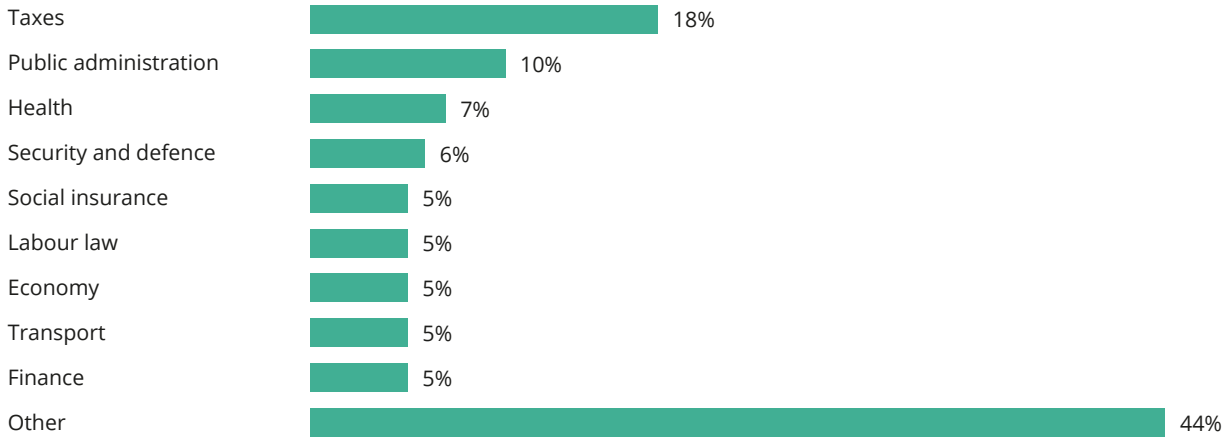
4. The scale of the SprawdzaMY Initiative

Drafted by:

BCG

The project's website is attracting interest among the public. From over 16,000 ideas proposed by citizens, after eliminating duplicates, nearly 13,000 deregulation ideas remained, which can be divided into 33 categories according to the application form. The category in which the most ideas were recorded is taxes - 18% of all ideas. In second place was public administration - 10% of ideas and in third place was health - 7%.

IDEAS SUBMITTED THROUGH THE WEBSITE BY CATEGORY



Based on ideas proposed by citizens through the website, expert teams have been selected to be responsible for the selection of ideas and the development of specific demands. Teams consisting of over 600 people worked in weekly sprints, generating a total of about 30 proposals weekly in the initial weeks of the project, accelerating to over 50 deregulatory forms submitted weekly in the later stages of the project.

EXPERT TEAMS (SO-CALLED STREAMS)

1. Tax (KIDP)
2. Taxes in Business
3. Catering
4. Telecommunications
5. Digital Economy
6. Banking (PBA)
7. Capital Markets and Funds
8. Labour Law
9. Construction Law/Real Estate
10. Public Procurement
11. Local governments
12. Criminal Law
13. Energy
14. Energy Transformation
15. Healthcare and Medicine
16. Pharmacy
17. Science, Education, Primary Education
18. Higher Education
19. Startups, Venture Capital
20. Food
21. ESG and Accountability
22. European Union Funds
23. SMEs (PCC)
24. Warsaw Enterprise Institute
25. Defence and Security
26. Cryptocurrencies and Blockchain
27. Non-bank (ZPF)
28. Insurance (PIU)
29. GDPR
30. Arbitration
31. TSL
32. mObywatel/Digital Administration

STREAMS	EXPERTS
32 defined initiatives	>600 people

So far, teams of experts have developed as many as 1185 proposals, of which 583 have been discussed at the Steering Committee. From this pool, as many as 500 proposals were published on the project›s website, allowing citizens to comment on and vote for them. The number of votes cast reached almost 700,000 and there were nearly a thousand comments. The number of proposals submitted to the government side significantly exceeded the initially planned target of 300 demands. The number of proposals submitted by experts and accepted by the Steering Committee was so high that the Government Deregulation Team agreed to consider them in two stages: in the first stage (as part of the 100-day sprint), the GDT adopted and reviewed 350 proposals, while another 137 proposals were forwarded by the Team SprawdzaMY to the government side in mid-June 2025 - they will be discussed and considered by the GDT in the autumn of 2025. In total, as part of the first Phase of the Deregulation project, expert teams submitted as many as 487 proposals to the government side, **exceeding the initial assumptions (300 proposals) by almost 40%.**

From the 350 deregulatory proposals submitted in the first stage, all have been discussed, of which 211 were accepted and forwarded for implementation, 76 rejected and 44 suspended by the government side. 36 proposals have been implemented into the legal system.

THE SOLUTIONS ACCEPTED BY THE GDT INCLUDE AMONG OTHERS

- recognition of electronic signatures in customs procedures,
- a faster route to adoption for children and future parents
- postgraduate studies more accessible for people with disabilities.

Implementing these demands contributes to simplifying the daily functioning of citizens and facilitates conducting business activities in Poland.

Currently, the relevant ministries are working on preparing the appropriate legislative projects and the Team SprawdzaMY is actively monitoring their content for compliance with the assumptions of deregulatory demands.

FOR THE 130 PROPOSALS, OVER 100 LEGISLATIVE PROJECTS HAVE ALREADY BEEN PUBLISHED. AMONG THEM ARE SUCH PROJECTS AS:

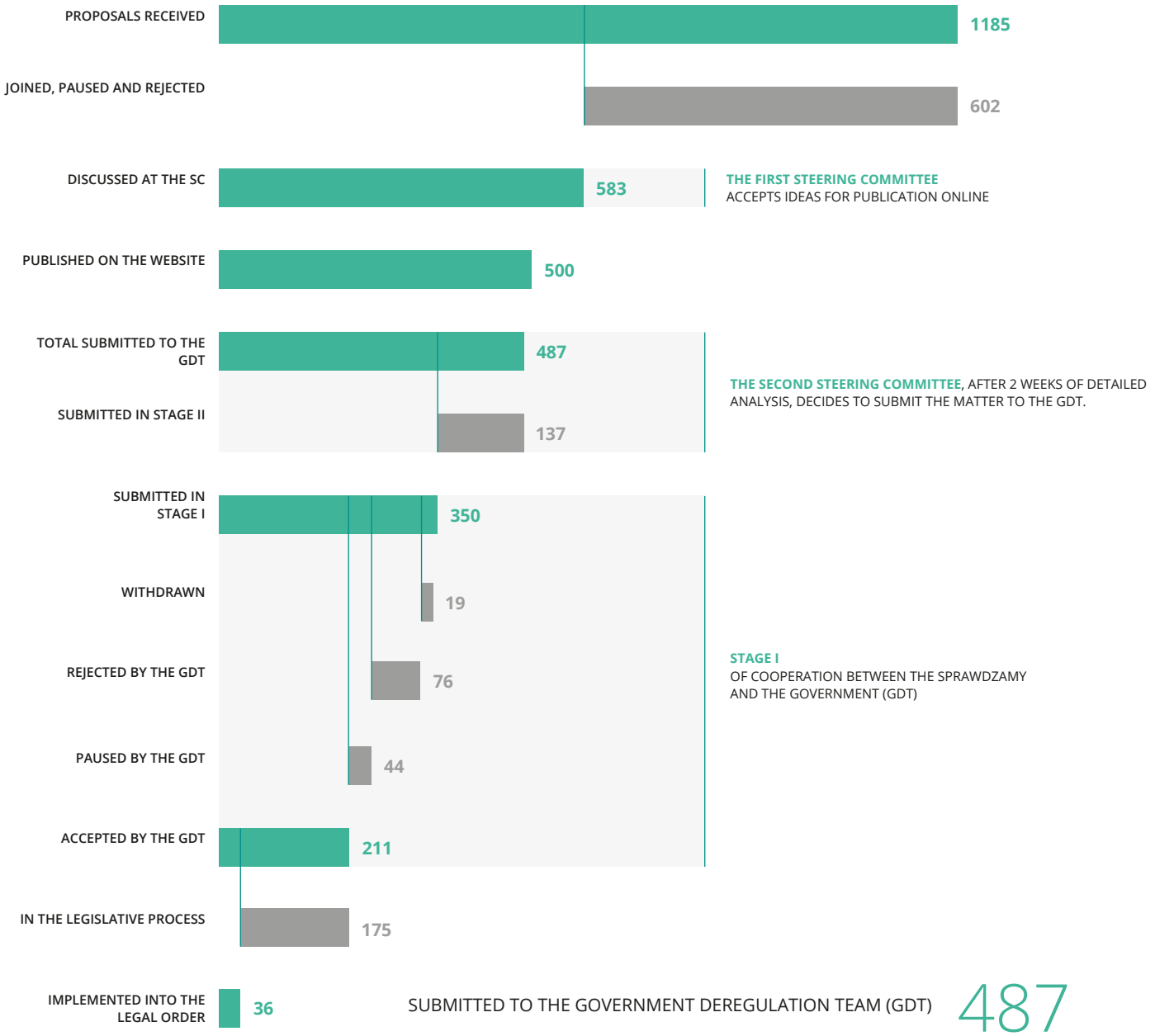
- wider application of the «tacit resolution of the case» institution when the time for handling provided in the regulations is exceeded by the authorities.
- facilitating the installation of private electric vehicle charging infrastructure in multi-family residential buildings,
- integration of existing administrative systems in services for citizens.

SOME OF THE LEGISLATIVE ACTS IMPLEMENTING THE SPRAWDZAMY PROPOSALS HAVE ALREADY BEEN PASSED BY PARLIAMENT AND SIGNED BY THE PRESIDENT OF THE REPUBLIC OF POLAND. WE ALREADY HAVE 13 SUCH DEMANDS INCLUDED IN THE LEGAL ACTS, FOR EXAMPLE:

- reduction in the frequency of business activity inspections,
- remote hearings before the National Appeal Chamber - time and money savings for entrepreneurs,
- electronic delivery of attachments to administrative decisions.

The SprawdzaMY Initiative team, as part of the subsequent phases of the project, will continuously monitor the legislative process, ensuring that the developed regulations comply with the original assumptions of the presented proposals.

Deregulation Phase 1.0



SUBMITTED TO THE GOVERNMENT DEREGULATION TEAM (GDT) **487**

CONSIDERED BY THE GDT* **350**

PENDING PROCEEDINGS IN THE GDT** **137**

Drafted by:

FUNDACJA Wsparcia Przedsiębiorczości

* Stage I -Proposals handled by the SprawdzaMY team and GDT during the first 100-day sprint

** Stage II - Proposals handled by the GDT beyond the 100-day sprint, resulting from the work of experts in Phase 1.0.

Status as of 27.06.2025

5. Main Areas of Phase 1.0 - The Big Seven

Drafted by:

BCG

The SprawdzaMY project focuses on seven main areas, known as the **Big Seven**, which are: **Taxation and public finance, Judiciary and administration, Security and defence, Digitisation, EU law, Health and social services and Energy and environment.**

5.1 Taxes and public finance

The first of them, taxes and public finance, is an area that gathered the most ideas for deregulation through the website, as many as 4,430, which equals 37% of all ideas. In this area, the largest number of demands was also reported: 354 (30%) and the most were transferred to the government - as many as 178 (36%). As it turns out, Poland has one of the most complicated tax systems not only in Europe but also in the world. According to the Tax Complexity Index (taxcomplexityindex.com, 2022)[25], which measures the complexity of corporate income tax systems that entrepreneurs deal with in various countries, Poland ranks as the second most complex among the 64 countries assessed. Only Peru has a more complex system, while countries such as Germany, France, the United Kingdom, the United States, or Canada are significantly ahead of us. Furthermore, looking at the tax payment index (World Bank Group, 2019)[26], which reflects the ease of meeting tax obligations, Poland ranks 77th out of 190 countries surveyed, far behind most Western countries, such as Belgium, France and Germany. These two indicators reflect the tax difficulties faced not only by companies but also by individuals.

4430
Ideas submitted via the website

354
Expert's proposals

178
Proposals submitted to the government side

5.2 Judiciary and administration

The judiciary and administration is the second area that has gathered the most ideas from the public - 3004 (24% of all). This area is also second in terms of calls announced: 239 (20%) and ideas submitted to the government - 100 (20%). According to the Judicial Process Quality Index (World Bank Group, 2019)[27], which evaluates the degree of implementation of good practices supporting the quality and efficiency of the judiciary system, Poland achieved a relatively high score of 11.0 on a scale from 0 (lowest quality) to 18 (highest). This is slightly less than the average for high-income countries according to the OECD, which is 11.7, but less than France (12.0) or the United Kingdom (15.0). However, according to the indicator that shows the degree of administrative burden in European Union countries (World Economic Forum, 2023)[28] Poland is the country with the highest burden - 2.69 out of 7, where 0 is the highest and 7 is the lowest burden - and ranks behind the Czech Republic and Romania.

3004
Ideas submitted via the website

239
Expert's proposals

100
Proposals submitted to the government side

25https://www.taxcomplexity.org/
26https://archive.doingbusiness.org/en/data/exploretopics/paying-taxes
27https://archive.doingbusiness.org/en/data/exploretopics/enforcing-contracts
28https://single-market-scoreboard.ec.europa.eu/business-framework-conditions/administration_rules_en

5.3 Security and defence

In the next area - Security and Defence - slightly fewer ideas were submitted (939, which constitutes 7% of all), fewer demands were formulated (23, which corresponds to 2%) and fewer proposals were sent to the government (11, i.e., 2%). As it turns out, despite the current geopolitical situation in the world and the war in neighbouring Ukraine, according to 2024 studies, as many as 88% of Poles consider Poland a country where it is safe to live, which is a decrease of only 1% compared to 2019 (CBOS, 2019, 2024)[29]. However, it should be kept in mind that armed conflicts and competition for influence create an increasingly unstable and unpredictable international environment, which makes improving the functioning of this area particularly important.



939

Ideas submitted via the website



23

Expert's proposals



11

Proposals submitted to the government side

5.4 Digitisation

Digitisation is an area that gathered 609 (4% of all) ideas from the public, in which as many as 91 (8%) demands were made. Of these, as many as 34 (7%) proposals have already been submitted to the government side. Digitisation is an area in which Poland is among the leading countries in the European Union, as confirmed by the results of the DESI index [30] (Digital Economy and Society Index) (European Commission, 2023)[31], according to which Poland has met or exceeded the EU average in 6 out of 32 indicators. This includes, among other things, the percentage of companies offering training in the field of ICT (25% in Poland versus 22% EU average), access to broadband internet with a bandwidth of at least 100 Mb/s (65% in Poland, 55% in the EU) and the coverage of FTTP technology (60% in Poland, 56% in the EU). Despite such good results, Poland, as a country leading in digitisation and ahead of many Western European countries, needs appropriate legal regulations to continue setting trends in this area and to enable further development.



609

Ideas submitted via the website



91

Expert's proposals



34

Proposals submitted to the government side

29https://single-market-scoreboard.ec.europa.eu/business-framework-conditions/administration_rules_en; https://single-market-scoreboard.ec.europa.eu/business-framework-conditions/administration_rules_en

30https://www.gov.pl/web/ia/wskaznik-desi-jako-miernik-stopnia-cyfryzacji-panstw#:~:text=DESI%20jest%20r%C3%B3wnie%C5%BC%20indeksem%20przydatnym%20do%20monitorowania,si%C4%99%20pod%20uwag%C4%99%20jedynie%20kluczowe%20us%C5%82ugi%20administracji

31https://digital-decade-desi.digital-strategy.ec.europa.eu/datasets/desi/charts

5.5 EU law

In the next selected area - EU law - as many as 684 (5%) ideas were received and 53 demands (4%) were reported, of which 8 (2%) were submitted to the government. This indicates the need for changes not only at the level of Poland but also the European Union, as also highlighted by Prime Minister Donald Tusk himself. During the meeting with Danish Prime Minister Mette Frederiksen, it was emphasised that bureaucracy and excessive regulation are common problems of many member states. Prime Minister Donald Tusk emphasised that Poland, in preparation for taking over the presidency of the EU Council, intends to actively promote the topic of deregulation at the European level.[32]Moreover, for the purposes of changes in EU law, the phenomenon of gold-plating is also pointed out[33], which involves the introduction by EU member states of national laws that go beyond the minimum requirements specified in EU directives. If we want the European Union to remain competitive, innovative and friendly both to citizens and entrepreneurs, it is essential to systematically strive for a transparent and efficient regulatory environment.



684

Ideas submitted via the website



53

Expert's proposals



8

Proposals submitted to the government side

5.6 Health and social services

Health and social services are the area with the third highest number of reports through the website - 2284 (18%) - and with the third highest number of calls announced - 177 (15%). In this area, 71 (15%) proposals have already been submitted to the government side. The healthcare coverage index (OECD, 2023) [34]shows that only 96.9% of the population in Poland is covered by basic healthcare services. Compared to other highly developed countries, such as France, Norway, or Sweden, where this value is close to or equal to 100%, the percentage of the population with access to such services is low, suggesting that the system needs changes to keep up with the international standard.



2284

Ideas submitted via the website



177

Expert's proposals



71

Proposals submitted to the government side

32https://tvn24.pl/polska/premier-donald-tusk-biore-na-siebie-ten-brutalny-komunikat-czas-na-repolonizacje-gospodarki-st8411193

33https://sprawdzamy.com/static/files/gold-plating-maj-2025.pdf

34https://data-explorer.oecd.org/vis?fs[0]=Topic%2C1%7CHealth%23HEA%23%7CHealthcare%20coverage%23HEA_COV%23&pg=0&fc=Topic&bp=true&snb=1&vw=ov&df[ds]=dsDisseminateFinalDMZ&df[id]=DSD_HEALTH_PROT%40DF_HEALTH_PROT&df[ag]=OECD.ELS.HD&df[vs]=1.0&dq=.A...&pd=2010%2C&to[TIME_PERIOD]=false

5.7 Energy and environment

In the field of energy and environment, citizens submitted 759 (6% of the total) ideas for changes and 143 demands (12%), of which 62 (13%) were forwarded to the government. Looking at how the prices of electricity have fluctuated in recent years, from 209 PLN per MWh in 2020, through 784 PLN per MWh in 2022, to almost 418 PLN per MWh in 2024 [35] , it is extremely important to ensure energy security for Poles. This concerns not only households but also businesses, particularly those that are most energy-intensive, such as steelworks and factories, where the cost of electricity can determine the fate of a company in the country. Furthermore, in the light of the current energy transformation, an appropriate regulatory environment is particularly important to enable the efficient restructuring of the energy system and achieve decarbonisation goals.



759

Ideas submitted via the website



143

Expert's proposals



62

Proposals submitted to the government side

35https://energy.instrat.pl/ceny/energia-rdn/

6. Review of Key Proposals within the Big Seven

Drafted by









6.1 Taxes and public finance

6.1.1 THE PRESUMPTION OF INNOCENCE OF THE TAXPAYER IN TAX SETTLEMENTS[36]

WHAT IS SPRAWDZAMY CALLING FOR?

The change proposed by SprawdzaMY aims to strengthen the principle of presumption of innocence for the taxpayer as well as the principle of in dubio pro tributario (resolving doubts in favour of the taxpayer). The premise of the initiative is to prevent the tax authority from challenging the taxpayer›s settlements in situations where there are factual or legal doubts that cannot be unequivocally resolved in their favour. The initiators propose that the obligation to prove a violation of regulations should rest on the tax authority, rather than - as is often the case currently - on the taxpayer to demonstrate that they acted in accordance with the law.

WHY DOES IT MATTER?

The complexity of tax regulations, as well as the endless variety of factual situations in which taxpayers operate, often leads to the questioning of the tax settlements they make. Currently, a taxpayer often has to fight to defend their position despite the lack of clear evidence of their dishonesty or abuse of law. In practice, this could lead to situations in which tax authorities may arbitrarily question settlements that are in accordance with the law, even without clear evidence of tax evasion.

An example can be the changing and increasingly stringent due diligence standards, which effectively shift the burden of detecting tax fraud onto the taxpayer, a task that should be the responsibility of the tax administration. It often happens that a taxpayer, who in good faith entered into cooperation with a contractor without knowledge of their tax abuses, is deprived of the right to deduct tax on the grounds of insufficient verification of the contractor. As a result, honest taxpayers are burdened with the consequences of the dishonesty of other entities.

There are known cases where such burdens result in very severe consequences, which can be difficult to overcome, especially for smaller entrepreneurs.

Strengthening the presumption of innocence principle will provide taxpayers with additional procedural protection. The change primarily complements the existing rule of resolving doubts regarding the law in favour of the taxpayer and supplements the principle of seeking objective truth in tax proceedings.

According to the proposed amendment (excluding, in particular, situations where the disclosure of facts is required by law), in tax proceedings initiated ex officio, doubts that cannot be resolved regarding the factual situation should be resolved in favour of the taxpayer.

The aim of the amendment will be to strengthen the instruments for protecting the rights and interests of the taxpayer and other parties to tax proceedings, as well as to improve the relationship between taxpayers and tax authorities. This, in turn, will contribute to strengthening the stability of the legal environment in which Polish entrepreneurs operate, protecting them from the negative effects of the arbitrary approach of tax authorities to ambiguous factual situations.

COMMENTS

Expanding the tools to protect taxpayers from excessive shifting of the responsibility for collecting evidence and clarifying the case onto them is a justified step towards strengthening procedural guarantees in tax proceedings. This will be crucial, especially in cases with a complex factual situation or in situations where the taxpayer does not have access to evidence, for example, when it is in the possession of their contractor.

It is also worth considering the introduction of solutions that increase the scope of the application of the already existing principle of resolving legal doubts in favour of the taxpayer, as in practice it is very rarely applied by the authorities.

36https://sprawdzamy.com/pomysl/domniemania-niewinnosci-podatnika-w-rozliczeniach-podatkowych-id-1001/

6.1.2 NOT CHARGING INTEREST FOR DELAY IN THE EVENT OF EXCEEDING 6 MONTHS OF CONTROL[37]

WHAT IS SPRAWDZAMY CALLING FOR?

The proposed change assumes that when the duration of a tax or customs-fiscal inspection exceeds 6 months, if irregularities are found against the taxpayer, penalty interest for the entire period of this procedure will not be charged. Under the current legal status, prolonged tax settlement audits, sometimes lasting several years, are associated not only with the burden related to the activities conducted but also entirely transfer the financial burden resulting from the protracted actions of the authorities in the form of potential interest onto the taxpayers.

WHY DOES IT MATTER?

In the light of the findings by the NIK[38], the average duration of tax audits is 140 days and for customs and treasury audits, it is as long as 371 days.

Currently, the Tax Code provides that in the situation of a prolonged tax proceeding, interest on potential arrears for the period beyond the statutory duration of the proceeding is not charged. However, the act does not contain a corresponding regulation with regard to prolonged tax or customs-fiscal inspections.

Meanwhile, our experience shows that it is precisely these procedures that often take much longer than tax proceedings. During the audit period, the activity of the audited entity is subject to difficulties related to the audit activities and at the same time, each subsequent day potentially represents an additional financial burden in the form of accrued interest on any tax arrears.

The call from SprawdzaMY assumes filling the existing legal gap by introducing regulations that would prevent the accrual of interest for the period from the start of the inspection until the day it ends, if the inspection is not concluded within 6 months from the day it began.

Adopting such a solution will allow for minimising the burden on entrepreneurs caused by prolonged inspections, which will have a positive impact particularly on their current operations. The planned amendment will certainly improve the situation of Polish taxpayers, including entrepreneurs, but it may also encourage foreign investors who often fear regulatory uncertainty and lengthy control procedures in the company.

Another important aspect of the initiative is the potential increase in control efficiency. It can be assumed that if the calculation of interest is suspended in cases of prolonged control procedures, the tax authorities will be motivated to carry out the process more quickly and efficiently in order to avoid losing revenue from interest.

COMMENTS

Prolonged tax settlement audits constitute a significant burden for Polish taxpayers, particularly for small and medium-sized enterprises that do not have extensive financial or tax departments.

The proposed removal of the existing legal loophole that differentiates the situation of taxpayers during audits and tax proceedings should be considered justifiable. The initiative can contribute both to reducing the burden on taxpayers and to increasing the effectiveness of the control actions taken by tax authorities.

It should be noted that in its current wording, the draft amendment, on one hand, proposes that no interest shall be charged if the duration of the inspection exceeds 6 months, but on the other hand, it extends the similar time limit for tax proceedings, which is currently 3 months (according to the draft, it is to be similarly 6 months, as in the case of inspections). This solution may raise doubts regarding its validity. It seems appropriate, therefore, to aim to shorten, as far as possible, all procedures for verifying taxpayers› settlements.

37https://sprawdzamy.com/pomysl/nienaliczanie-odsetek-za-zwloke-w-przypadku-gdy-kontrola-podatkowa-przekroczy-6-miesiecy-id-1005

38Data on the inspections conducted in 2022.

6.1.3 INTRODUCTION OF TAX SETTLEMENTS IN THE RELATIONSHIP BETWEEN THE CITIZEN AND THE TAX OFFICE[39]

WHAT IS SPRAWDZAMY CALLING FOR?

The call from SprawdzaMY concerns the introduction of tax settlements in the relationship between the citizen and the tax office. Under the terms of the tax settlement, taxpayers could voluntarily pay a fixed amount in exchange for avoiding additional penalties and interest. At the same time, the call envisages punishing taxpayers who knowingly and repeatedly violate the regulations.

WHY DOES IT MATTER?

Tax obligations constitute one of the key financial burdens for Polish entrepreneurs. More than once, the very existence of a company has depended on the need to pay tax arrears along with interest. This issue is particularly severe for small and medium-sized enterprises.

An additional burden is also the increasing number of reporting obligations imposed on taxpayers. In this context, it is crucial to provide entrepreneurs with as many legal solutions as possible that allow for a flexible approach to fulfilling their obligations set out in tax laws. The answer to this need is the introduction of a tax settlement institution.

Alternative methods of resolving tax disputes, primarily including settlements with tax authorities, are in operation in other European Union countries: for example, in Italy there is an institution of tax settlement that enables the development of a common position between the taxpayer and the tax authority regarding a repayment plan for VAT liabilities. In Germany, there is a mechanism called «final settlement» (German: Tatsächliche Verständigung) constituting a binding settlement for both parties to the tax dispute.

The introduction of the solution can influence the development of partnership relations between entrepreneurs and tax authorities and thus increase the level of mutual trust. This mechanism may be particularly crucial for entrepreneurs facing financial problems, helping them to repay their arrears. Consequently, the solution will contribute to securing the continuity of business operations and thus the jobs it generates will be maintained. Tax settlements will also effectively contribute to ensuring stable revenues for the state budget by increasing the collection of receivables. Additionally, from the perspective of foreign investors familiar with such solutions from other EU countries, this will be an additional incentive to expand their operations in Poland.

COMMENTS

The SprawdzaMY proposal fits into the trend developing in many jurisdictions of implementing solutions that increase flexibility in the state›s approach to taxpayers fulfilling their tax obligations, while simultaneously ensuring the quick and efficient resolution of any tax disputes. In Poland, there are also examples of instruments that allow for a partnership cooperation between tax authorities and taxpayers. An example could be the Cooperation Programme, which, due to its specifics, is primarily aimed at large taxpayers.

Introducing a tax settlement would allow for the widespread establishment of partnership relations between taxpayers and the tax administration, ensuring the possibility of resolving tax controversies for all citizens and entrepreneurs, regardless of the size of their operations.

In addition to collaboration tools, we also notice the need for a comprehensive enhancement of the tax system through conducting dialogue in handling matters. Mediation or a tax agreement can increase the efficiency of resolving tax disputes. Additionally, the ability to conclude matters as a result of consensus will also be associated with certain and swift revenues to the state budget, which often is not achieved despite years of dispute with the taxpayer.

39https://sprawdzamy.com/pomysl/wprowadzenie-ugod-podatkowych-w-relacji-obywatel-urzad-skarbowy-id-1014

6.1.4 ELECTRONIC PITS FROM EMPLOYERS[40]

Currently, employers are obliged to provide an annual PIT-11 tax statement in paper form to each employee, including former employees, despite the increasingly widespread use of the e-PIT system.

WHAT IS SPRAWDZAMY CALLING FOR?

The proposed change assumes that employers would no longer be obligated to send PIT-11 forms to employees (including former employees). Instead, they would submit PIT-11 in electronic form to the tax administration system and employees would have access to their PIT-11 through the ePUAP platforms or Your e-PIT. Only at the request of the employee, informed about such a possibility, would the employer be obliged to deliver the PIT-11 form.

WHY DOES IT MATTER?

The call is important for several reasons. Firstly, it enables the reduction of administrative costs on the employer›s side associated with delivering PIT-11 to employees, which in the case of PIT-11s prepared in paper form particularly involve printing costs, potential packaging and postal fees. Secondly, it reduces bureaucracy and increases the efficiency of processes in companies by eliminating the need to perform tasks related to the preparation and dispatch of PIT-11 by employees responsible for the organisation and delivery of PIT-11 (significantly, experiences show that there are cases where employees, particularly former employees, do not collect their mail and the delivery process is delayed, which causes additional costs and burdens on the employer). Thirdly, it facilitates employees› access to PIT-11, giving them the opportunity to view the document in the ePUAP system or Your e-PIT at any time and place, without waiting for a shipment from the employer. Such a system also supports the archiving of documentation and provides the ability to view historical documents. Fourthly, it supports the pursuit of environmental protection and the operation of entrepreneurs in accordance with ESG (Environmental, Social and Governance) principles by eliminating unnecessary paper circulation.

Finally, it should be noted that such a solution is gaining popularity in other countries (it has been introduced, for example, in the United States and the United Kingdom). The electronic delivery of PIT-11 also fits into the broader digital transformation of HR processes, which includes the digitisation of, in particular, holiday applications, personnel documentation and declarations and applications that affect legal and tax obligations.

COMMENTS

Polish entrepreneurs spend an average of 334 hours a year on tax compliance, according to a study conducted by the European Parliament[41], placing us at an inglorious second place in the EU.

The call from SprawdzaMY, like any initiative that can contribute to reducing the burdens associated with tax reporting, is therefore a justified step that will remove the often unnecessary obligation to send the PIT-11 form to the employee.

The proposed solution aligns with the advancement of digitisation and the drive towards data integration on public service platforms, which enable secure delivery and receipt of confidential documents by citizens.

It should be noted that employers already often provide employees with PIT-11 in electronic form. However, this requires commitment on their part and the creation of their own solutions that enable the safe and confidential transmission of documentation - somewhat in parallel to the existing public solutions, the use of which is advocated by the Team SprawdzaMY.

40https://sprawdzamy.com/pomysl/elektroniczne-pit-y-od-pracodawcow---mniej-papieru-mniej-kosztow-id-1438/

41According to the European Parliament's report from February 2023, "Overview on the tax compliance costs faced by European enterprises - with a focus on SMEs"

OLDMAN SAGE

6.1.5 SIMPLIFIED DEBT COLLECTION - FASTER DEBT RECOVERY FOR SMALL BUSINESSES[42]

Simplification in initiating the enforcement of undisputed receivables in business transactions based on a structured invoice (issued through the National e-Invoice System).

WHAT IS SPRAWDZAMY CALLING FOR?

The call concerns the introduction of a simplified enforcement procedure for micro and small enterprises, which will reduce formalities, shorten the duration of the proceedings and lower their costs. It would enable faster recovery of small claims, e.g., based on electronically confirmed invoices, using e-courts. Thanks to this, entrepreneurs could recover their money more effectively, reducing the risk of losing liquidity.

WHY DOES IT MATTER?

Court and enforcement proceedings in Poland are lengthy and often ineffective. The average time from filing a lawsuit to enforcing claims is about 2.5 years (979 days), of which the court and enforcement proceedings alone take 685 days. The effectiveness of quota enforcement remains low - in 2020, only 14.86% of receivables were recovered and only 23% of cases ended with full debt recovery. Most creditors, including small businesses, lose the funds due to them.

The result is increasing payment backlogs - 94% of companies are struggling with overdue payments and the total amount of arrears in the B2B sector exceeds PLN 44 billion. Over 46% of SMEs wait for invoice payments at least 30 days past the due date and 35% wait more than 60 days. The domino effect causes many companies to stop settling their obligations. In 2023, 4701 enterprises went bankrupt - the most in a decade - and non-payment is one of the main reasons for the loss of liquidity.

The stake is the stability of the micro-enterprise sector, which accounts for 28% of GDP and 42% of jobs in enterprises (approx. 4.4 million people). Persistent bottlenecks and ineffective enforcement destabilise this segment, limiting development and burdening the courts - in 2021, as many as 7.9 million enforcement proceedings were conducted, a 66% increase from the previous year.

Countries such as Germany and France have been using simplified reminder procedures for years, allowing for a quick obtaining of a payment order without a trial, if the debtor does not object. The Netherlands and Scandinavia are distinctive for efficient judicial and bailiff systems, which shorten the debt collection time. For comparison: in France, the average time to recover debts is 447 days, in Germany 499 days and in Poland 685 days. Estonia, in turn, has focused on digitisation, enabling the quick, electronic pursuit of minor claims without unnecessary formalities.

COMMENTS

The proposed changes can clearly improve the functioning of the economy and the judiciary. Accelerating the enforcement of minor debts will improve the liquidity of thousands of micro and small businesses - overdue receivables in B2B transactions exceed PLN 44 billion and increasing enforcement effectiveness by 5-10% could release PLN 2-4 billion annually. This is also a typical example of deregulation: fewer formalities, lower costs, faster access to legal protection. Simplifying procedures could cover 1-1.5 million cases annually, which would realistically relieve the burden on courts and bailiffs and reduce queues.

It is important, however, that simplification does not lead to abuses. Safeguards are needed - clear eligibility criteria (e.g., only undisputed, electronically confirmed invoices), a rapid objection procedure and supervision over bailiffs. A properly designed reform can improve conditions for entrepreneurs, increase trust in institutions and strengthen the culture of timely payments.

42https://sprawdzamy.com/pomysl/uproszczona-egzekucja-naleznosci---szybsze-odzyskiwanie-dlugow-przez-male-firmy-id-1115/

OLDMAN SAGE

6.1.6 1% CIT FOR PUBLIC BENEFIT ORGANISATIONS - BUSINESS SUPPORTS GOOD CAUSES[43]

Enabling companies paying corporate income tax (CIT) to allocate 1% of CIT to the activities of Public Benefit Organisations.

WHAT IS SPRAWDZAMY CALLING FOR?

The proposal assumes the introduction of an option for companies to allocate 1% of the due corporate income tax (CIT) to a selected public benefit organisation (OPP). This mechanism is related to the well-functioning 1.5% PIT deduction system and aims to extend social responsibility to the business sector. This solution would be voluntary and would not entail additional costs for companies, while at the same time providing a new, annual stream of funding for social organisations.

WHY DOES IT MATTER?

Currently, entrepreneurs can deduct donations to Public Benefit Organisations up to 10% of the company›s income, however, in practice, this relief is used marginally - in 2023, only 0.09% of CIT taxpayers (6.125 companies out of approximately 6.7 million economic entities registered in Poland) took advantage of it, which indicates a decrease compared to previous years. For comparison, nearly 15 million people took advantage of the 1.5% PIT mechanism, collectively donating a record 1.9 billion PLN, of which only three organisations collected over 566 million PLN. Such concentration demonstrates the scale of possibilities that could arise on the side of companies. The NGO sector in Poland comprises over 9,000 active organisations, which face financial instability - only about 30% of them declare having an annual budget exceeding 100,000 PLN and 44% indicate problems with financial continuity.

In Slovakia, entrepreneurs can allocate 1%, 2%, or even 3% of their corporate income tax (CIT) to a chosen public benefit organisation (PBO) and over 50% of eligible companies make use of this, generating approximately 50 million euros annually for the third sector. In Romania, the system allows for a donation of up to 20% of the due corporate income tax, up to a limit of 0.75% of turnover. In 2022, over 30,000 companies took advantage of this. In France, the tax relief amounts to 60% of the value of donations up to 2 million euros per year (and above that, 40%), which generates approximately 3 billion euros annually for philanthropic purposes. In Canada, companies can deduct up to 75% of net income, with a five-year accounting period - which stimulates long-term support and planning of CSR activities.

COMMENTS

Significantly, the mechanism would not involve additional costs for companies - 1% of CIT would be transferred from the tax due, thus from funds already designated for payment to the tax authorities. With annual CIT revenues at around PLN 85 billion (2022), the cost to the state budget would be about PLN 0.85 billion, which is less than 1% of the total income from this source.

During the further legislative work, it is worth ensuring operational simplicity - for example, the possibility to enter the KRS number of the selected public benefit organisation in the CIT-8 form. Correlating this solution with the 1.5% PIT mechanism would facilitate implementation and increase its clarity. Transparency and open reporting of the funds transferred will also be crucial.

This type of tool could realistically enhance the financial independence of social organisations, promote corporate responsibility and build their local engagement. From a technical perspective, the system could operate on principles similar to the existing 1.5% PIT - with a simple mechanism for indicating public benefit organisations in CIT-8, a uniform rate and a joint information campaign aimed at entrepreneurs. ,

43http://sprawdzamy.com/pomysl/1-cit-dla-organizacji-pozytku-publicznego---biznes-wspiera-dobro-id-1710

6.1.7 TRANSITION PERIOD - AN END TO SUDDEN TAX CHANGES FOR BOTH CITIZENS AND BUSINESSES[44]

Introduction of a mandatory 12-month transition period for changes in tax regulations. Currently, new regulations are coming into effect almost immediately, which destabilises business operations and complicates financial planning. It used to be common practice to introduce tax changes from 1 January of the new year. Ensuring a constant adjustment period will increase legal certainty and improve citizens› trust in the State.

WHAT IS SPRAWDZAMY CALLING FOR?

A transition period is the period of transition between the publication of a new legal regulation in the Official Gazette and its entry into force. Its aim is to enable citizens and companies to prepare for the application of the new law. The deregulation team in its demands recommends the introduction of a mandatory 12-month transition period for changes in tax law. Extending the transition period will increase legal certainty and improve citizens› trust in the state.

WHY DOES IT MATTER?

15 days: that was the median duration of the transition period for key tax laws in Poland in the years 2018-2022.

According to the regulations concerning legislation, 14 days is the minimum transition period for normative acts containing universally binding provisions. The term «transition period» is therefore not rigidly defined, but can (and should) be adapted to the type of legal act being implemented and the scope of its impact. It is a very short period, especially since tax changes involve not only alterations in the calculation of the tax liability itself (often increasing this burden), but primarily the need for legal analysis, which will allow for the assessment of how to apply the new regulations to the activities of a particular entrepreneur.

Examples from other countries show that the issue requires changes: the transition period in Estonia is generally not less than 6 months, unless the changes are in favour of the taxpayer, while in the Czech Republic the standard legislative process lasts from one to two years. Similar solutions are also in place in Germany.

In Poland, there has been a lack of a clear approach to this issue for years, which lowers the security of conducting business and adversely affects the willingness to increase investment expenditures - so crucial to strengthen the growth rate of the Polish economy and the attractiveness of our country for business. A longer transition period significantly increases the predictability of the law, particularly in the context of complex and frequently changing tax regulations. Entrepreneurs, having more time to familiarise themselves with changes, can better plan their business, investment and budget decisions, implement procedures, or update financial software, as well as minimise risk, particularly in the area of disputes with tax authorities.

COMMENTS

In the light of the regulations that set 14 days as the minimum transition period, changing the rules is certainly a significant step in providing citizens with an appropriate quality legal environment. However, it would be reasonable to aim for implementing a 12-month transition period for tax regulations. Additionally, the introduction of similar mechanisms should also be considered in relation to the amendment of regulations concerning other public law obligations, including in particular social insurance contributions (ZUS). These changes should also not be introduced during the year, but at its beginning.

44https://sprawdzamy.com/pomysl/vacatio-legis---koniec-z-naglymi-zmianami-podatkowymi-wobec-zarowno-obywateli-jak-i-firm-id-1110

6.2 Judiciary and administration

OLDMAN SAGE

6.2.1 IMPLEMENTATION OF THE GENERAL LEGAL PRINCIPLE «1 NEW REGULATION IN PLACE OF 2 REPEALED REGULATIONS»[45]

WHAT IS SPRAWDZAMY CALLING FOR?

The project proposes the introduction of a general legislative principle, according to which the enactment of any new regulation must be correlated with the repeal of at least two existing legal provisions. The goal is to systematically reduce the overproduction of regulations, particularly those related to economic activity, by triggering a deregulatory impulse. This mechanism is of the nature of a political declaration by the Prime Minister and not a legal norm - its implementation will depend on the will of the Council of Ministers and the coordination of legislative work.

WHY DOES IT MATTER?

The current regulatory state in Poland can be described as overregulation. Entrepreneurs, advisors and experts emphasize that the legal environment is becoming increasingly complex and the applicable regulations are reaching the level of atomisation. Freedom of economic activity - a constitutional principle - is transforming into an exception from the principle of casuistic regulation of the economy.

Lawyers indicate that the main problem today is not the application of the regulations, but determining which of the numerous regulations are in force and applicable. Such a situation threatens the certainty of law, predictability and accessibility of the system for citizens and entrepreneurs.

The «one in, two out» principle will allow for the halting of this trend by enforcing a review of existing regulations with each new legislative initiative. It may bring long-term effects in the form of reduced regulatory costs and increased legal transparency.

COMMENTS

The proposed solution is of a political declaration nature, but it may bring about real deregulatory effects. It obligates the administration to review existing regulations, improves the quality of law-making and reduces compliance costs. Although the principle does not have a binding normative character, it can influence the legislative culture and serve as a self-regulatory tool for the government. Thanks to this solution, it will be possible to limit the overproduction of regulations, which will translate into greater transparency and predictability of the law. In the longer term, this may increase the investment attractiveness of Poland and level the playing field between Polish and foreign companies. Importantly, implementing such a rule will also strengthen the quality of the legislative process, forcing reflection on the justification of each new regulation and the elimination of unnecessary or outdated solutions.

45https://sprawdzamy.com/pomysl/stopniowe-zmniejszanie-liczby-przepisow-dzieki-zasadzie-jeden-nowy-za-dwa-stare-id-2508/

OLDMAN SAGE

6.2.2 CHANGE OF LOCAL JURISDICTION - JUSTICE WHERE IT WORKS FASTER[46]

WHAT IS SPRAWDZAMY CALLING FOR?

The planned change aims to make the regulations on local jurisdiction in civil cases more flexible. The claimant will gain the opportunity to direct the lawsuit to a less burdened court in the region instead of solely to a court determined by the rigid rules of location. This flexibility would cover most matters (except for cases of exclusive jurisdiction and matters assigned to special courts, e.g., intellectual property). The condition is that the selected court must belong to the same district or appeal as the court previously in charge - which protects the defendant from the necessity of travelling to a court that is too far away.

WHY DOES IT MATTER?

Currently, Polish courts, especially in large cities, are overwhelmed with cases, causing proceedings to last even for years. For example, the District Court in Warsaw handles over a million cases annually, while the smallest courts handle fewer than 100,000. In Warsaw, the wait for the first trial can be even 5 years. Such huge disparities translate into unequal access to justice. A resident of a small town will obtain a verdict much faster than a party in Warsaw.

Statistics also show a deepening slowdown in proceedings. In 2023, the average duration of a case was approximately 5.9 months, 40% longer than in 2015, despite the fact that during this time the influx of cases to courts decreased by over 25%. This is a drop in efficiency, matters are dragging on longer despite a lighter workload. Such a state harms citizens (years of waiting for justice) and the economy (legal uncertainty hinders investment).

Flexibilising local properties can inhibit these negative trends. It will allow directing new cases to where there are free processing capacities of judges, instead of overloading already crowded units. Thanks to this, the overall time for case recognition should be reduced, giving the parties a chance to resolve their issues more quickly. In the scale of the system, this means a more effective use of judicial personnel and better implementation of the right to a court within a reasonable time.

Foreign experiences show that such flexibility works. In Germany, many categories of disputes are handled by separate courts (administrative, labour, social insurance), which relieves the burden on the general courts and from 2026, all court records there are to be maintained electronically. Estonia, a leader in e-government, also recognises the need for a flexible response to the overload of courts. There are significant differences in the duration of proceedings between regions (e.g., ~97 vs ~134 days for civil cases). The planned Estonian reform involves merging courts into a single national structure and assigning cases to judges based on their specialisation and caseload, regardless of location. There is also consideration being given to transferring cases to less burdened courts (without changing the formal jurisdiction) in order to balance the workload. The proposed change could also bring our system closer to more flexible models, such as in Sweden, where courts can take over cases from other courts to streamline proceedings. The condition for success, however, will be ensuring the appropriate technical tools.

OUR COMMENT

The reform could relieve the most congested courts and shorten the time of adjudication. Citizens would gain faster and more equitable access to justice. Their cases would be processed more efficiently. The condition for success is the further computerisation of courts. It is necessary to implement a platform that monitors court occupancy in real time and makes this information available to citizens. It is also important to develop e-proceedings (submission of documents online, remote hearings in justified cases) to fully utilise the potential of the reform. It is necessary to simultaneously reduce the risk of abuse in choosing a «convenient» court (forum shopping). Maintaining the choice within one appeal and appellate control should prevent such a phenomenon. Additionally, the supervision of the Supreme Court will guarantee the consistency of jurisprudence despite the greater freedom of court choice.

46https://sprawdzamy.com/pomysl/szybsze-postepowania-cywilne---koniec-z-przeladowanymi-sadami-id-1410/

6.2.3 RATIONALISATION OF THE SCALE OF PENALTIES IN ECONOMIC TRADE - SO-CALLED DECRIMINALISATION OF ECONOMIC TRADE.[47]

Decriminalisation of economic turnover - reduction of criminal sanctions in economic activity.

WHAT IS SPRAWDZAMY CALLING FOR?

The change proposed by the Team SprawdzaMY assumes adjusting the scale of penalties for economic offences that are very often committed as a result of an error or negligence, to the actual extent of the social harm of such prohibited acts. At present, the statutory threats for economic or fiscal offences are similar and sometimes even higher, than in the case of the most serious crimes aimed at the health or life of another person.

WHY DOES IT MATTER?

Excessively harsh punishment of entrepreneurs who have committed an offence as a result of an error or negligence is not only unjustifiable from the perspective of the rationality of punishment, but can also be detrimental to economic development. Excessive penalties discourage entrepreneurs from conducting business and limit economic development. The fear of such severe penalties can also lead to decisions being excessively conservative, even if the actions of the entrepreneur would fall within the bounds of justifiable economic risk.

As the authors of the proposal rightly pointed out, currently, for unreliable management of accounting documentation, an entrepreneur can be sentenced to up to 25 years in prison. A similar penalty of 25 years› imprisonment may be imposed on a person who misjudges economic risk and, as a result of a wrong decision, causes damage to the company exceeding 10 million PLN. Meanwhile, against a perpetrator who, by participating in a fight or assault, causes the death of a person, a sentence of 2 to 15 years of imprisonment can be imposed.

The proposed changes are therefore aimed at eliminating situations in which a mistake in tax accounting or making a wrong economic decision could expose the perpetrator to more severe criminal liability than depriving someone of life.

COMMENTS

The current statutory penalties for economic crimes appear disproportionately high compared to other types of crimes, which typically involve a much greater degree of social harm.

We also draw attention to the fact that recently, or in the near future, new regulations imposing administrative obligations on entrepreneurs (such as reporting) have come or will come into effect, non-compliance with which can result in severe financial penalties. Unfortunately, just like the regulations introduced earlier, they do not specify the criteria for measuring penalties, which creates a risk of imposing sanctions at the maximum amount, even in cases of violations of relatively minor severity. For this reason, it is necessary to support the proposition that criminal and fiscal criminal regulations should, to a greater extent than currently, take into account the degree of culpability and the specific nature of conducting business activities, while condemning acts of substantial social harm, rather than entrepreneurs who have committed acts resulting from oversight, lack of due diligence, or error.

47https://sprawdzamy.com/pomysl/racjonalizacja-wymiaru-kar-w-obrocie-gospodarczym---tzw-dekryminalizacja-obrotu-gospodarczego-id-1015

6.2.4 DIGITISATION OF COURT PROCEEDINGS[48]

Digitisation of court correspondence circulation.

WHAT IS SPRAWDZAMY CALLING FOR?

Currently, procedural documents in the vast majority of types of court proceedings can only be submitted in paper form, because the common courts lack the appropriate IT and organisational infrastructure to handle electronic correspondence. Although the legislator has introduced general regulations in the past that allow for the submission of procedural documents in such form, in practice this possibility depends on the technical or organisational conditions of a particular court. However, usually general courts do not have such conditions. The call from SprawdzaMY involves the introduction of legislative and technical solutions that ensure courts have the conditions for electronic correspondence with parties to proceedings.

WHY DOES IT MATTER?

The average duration of proceedings has increased over the years 2011-2024. In 2011, proceedings in business cases (between entrepreneurs) at the first instance before the district court lasted an average of 3.6 months and before the regional court 6 months. In 2024, these figures are 5.8 months and 12.6 months[49], respectively, thus the duration of the proceedings has approximately doubled.

One way to speed up proceedings is the proposed electronic circulation of correspondence. Currently, the exchange of procedural documents between a party and the court, as well as between parties, takes place via postal shipments. This significantly extends the duration of the proceedings and requires the involvement of the parties and the administrative staff of the courts. At the same time, certain proceedings conducted through computer systems are already in operation, where the exchange of documents occurs more quickly and where formal deficiencies are less frequent (in particular, thanks to the use of clear electronic forms that communicate in real-time about unfilled fields). These are registration procedures (conducted through the Court Registers Portal), bankruptcy proceedings and restructuring proceedings (both types conducted through the National Debt Register). Moreover, in legal proceedings, including those for payment, the common courts use the Information Portal and through this Portal they deliver documents originating from the courts, such as judgments. In this case, however, the correspondence is one-way - only from the courts to the parties involved.

An example of the use of technological advancement in the exchange of court documents is the electronic circulation of documents used, for example, in the federal courts of the USA[50] and in the federal courts of Australia[51]. Meanwhile, in the European Union, the Baltic countries are examples of nations with well-developed infrastructure for the digital circulation of court documents[52].

COMMENTS

We take a positive view of the proposed change. The digitisation of court proceedings can greatly enhance the efficiency of courts, which are significantly burdened by the volume of cases they handle. The proposed change will undoubtedly also have a positive impact on the quality of the judiciary by reducing administrative burdens on both the courts and citizens and their representatives.

It should be remembered that the mere amendment of the regulations will not suffice and it is necessary to ensure technical and organisational conditions, which will require the allocation of additional financial resources.

48 https://sprawdzamy.com/pomysl/cyfryzacja-postepowan-sadowych-id-1308

49 All data provided by the Ministry of Justice, https://isws.ms.gov.pl/pl/baza-statystyczna/opracowania-wieloletnie/, file named. Average duration of court proceedings from 2011 to 2024 - selected repertoires.

50 United States Courts, https://www.uscourts.gov/court-records/electronic-filing-cm-ecf

51 Federal Court of Australia, https://www.fedcourt.gov.au/online-services/elodgment.

52 Lithuania - https://e-justice.europa.eu/topics/court-procedures/civil-cases/online-processing-cases-and-e-communication-courts/lt_en, Latvia - https://e-justice.europa.eu/topics/court-procedures/civil-cases/online-processing-cases-and-e-communication-courts/lv_en, Estonia - https://e-justice.europa.eu/topics/court-procedures/civil-cases/online-processing-cases-and-e-communication-courts/ee_en.

6.2.5 FASTER VERDICTS, LESS BUREAUCRACY - EXPANSION OF THE EXISTING E-COURT›S OPERATIONS[53]

Introduction to the regulations of the Code of Civil Procedure for the new electronic mode of commercial proceedings, aimed at ensuring the availability of entirely electronic proceedings for a larger number of court disputes, facilitating the submission of documents, streamlining the conduct of evidential proceedings and ensuring exclusively electronic communication between the parties, as well as between the parties and the court.

WHAT IS SPRAWDZAMY CALLING FOR?

The E-Court in Poland has been operational in a limited capacity since 2010 in the optional electronic order for payment procedure (EPU). However, the delivery of the payment order issued by the court to the defendant still occurs in paper form, sent by registered mail. In accordance with the proposed change, the e-Court would generalize the solutions currently used in the EPU to other types of court proceedings, enabling full digitisation of these proceedings through the application of technical solutions such as maintaining case files exclusively in electronic form, remote hearings and electronic circulation of correspondence. Currently, remote hearings are being used increasingly in court proceedings, including commercial cases (between businesses) concerning payment, due to the pandemic restrictions from 2020-2022. In total, from 3 July to 22 October 2020, 2.29% of court hearings were held via videoconference. From 23 October to 31 December 2020, 2.89%. From 1 January to 31 December 2021, 7.32%. Meanwhile, from the 1st to the 27th of January 2022, 13.3%[54].

WHY DOES IT MATTER?

Expanding the scope of the e-Court›s operations, in addition to speeding up the proceedings, would additionally reduce the costs of preparing legal documents (eliminating the need for printing, packaging and sending them at a postal facility). Furthermore, an advantage of this change would be the increased security of information exchange, as it would simplify the process of confirming the authenticity of documents, especially those originating from courts, including judgements. At the same time, the existing IT systems (Court Registers Portal, National Debt Register, Information Portal) confirm that electronic correspondence circulation is faster and more reliable and is also eagerly used by entrepreneurs.

Remote hearings also speed up the resolution of cases. Particularly in this part of economic affairs, where it is necessary to hear many witnesses - the absence of the need to spend time travelling to court (e.g. the need to take leave) definitely facilitates appearing before the court to give testimony. Practice shows that witnesses less frequently submit requests to change the date of the hearing if a remote trial is used. E-Courts are commonly used, for example in Estonia[55], thanks to which the average duration of civil proceedings there has decreased by about 36% over the last few years[56].

COMMENTS

The proposal to expand the operations of the e-Court is part of a series of initiatives aimed at enabling courts and state institutions to use modern technological solutions that improve the efficiency of these entities while simultaneously providing citizens with easier access to them.

However, we point out that the demand for broader application of EPU solutions would require adapting this procedure to more complex economic cases, especially since some elements of the EPU still need further refinement, for example, the use of presumptive delivery to an address provided in the PESEL register - which is a lower standard than in regular judicial proceedings. In complex economic matters, the key and feasible for rapid implementation is the use of electronic documents.

53https://sprawdzamy.com/pomysl/szybsze-wyroki-mniej-biurokracji---rozszerzenie-dzialania-istniejacego-e-sadu-id-1326

54All data were provided by the portal prawo.pl, https://www.prawo.pl/prawnicy-sady/rozprawy-zdalne-statystyki-za-2020-2021-i-styczen-2022-r,513546.html.

55European e-Justice Portal, https://e-justice.europa.eu/topics/court-procedures/civil-cases/online-processing-cases-and-e-communication-courts/ee_en. The Centre of Registers and Information Systems (RIK), https://www.rik.ee/en/international/e-file.

56E-Estonia, https://e-estonia.com/wp-content/uploads/factsheet_e-justice.pdf.

OLDMAN SAGE

6.2.6 LIMITING THE ABUSE OF REMAND DETENTION AGAINST CITIZENS[57]

It is necessary to introduce legislative changes that limit the possibility of extending remand detention and promote the use of alternative, liberty-based preventive measures, such as police supervision or bail.

WHAT IS SPRAWDZAMY CALLING FOR?

The change in regulations aims to limit the practice of excessive and prolonged use of temporary detention. It is advocated to implement tools that will strengthen judicial control over the justification of isolation, while also promoting alternative measures. The change in regulations would allow, among other things: the introduction of the obligation for transparency of meetings and precise justification of arrests, increased judicial control over the extension of detention, strengthening of the role of alternative measures such as supervision, bail, house arrest and the creation of a system for monitoring the decisions issued and their social effects.

WHY DOES IT MATTER?

The use of remand detention against individuals who are innocent in the eyes of the law deeply interferes with their fundamental rights. According to the data presented in the Court Watch Polska report (2024), the number of people detained for over two years increased from 2 in 2014 to 51 in 2022. However, in 2021, as many as 95% of the prosecutor›s applications for detention were granted by the court. The analysis of alternatives is missing and the justifications are often laconic. The change in regulations will restore balance between the need to secure proceedings and individual freedom and will increase trust in the justice system. Prolonged stay in remand detention has a negative impact on the mental health of detainees and their family relationships. The change in regulations aims to mitigate such negative effects by reducing the duration of detention and applying alternative preventive measures. Clear and fair application of remand detention can increase citizens› trust in the justice system. The temporary arrest of company executives or owners can lead to the destabilisation of enterprises, job losses and a negative impact on the economy. The proposed changes aim to ensure that remand detention is not used in a manner that could harm business activities, unless it is absolutely necessary.

COMMENTS

Remand detention is not a punishment; therefore, it should not be recognised and treated as retribution for the harm caused. It should, however, be a tool - as a preventive measure to ensure the proper course of the case. It should be remembered that this measure is applied to a person who is legally innocent, hence it is crucial that the state›s interference in human rights and freedoms fulfils the constitutional principles of proportionality, purposefulness and, most importantly, necessity.

57https://sprawdzamy.com/pomysl/ograniczenie-naduzyc-w-stosowaniu-aresztow-tymczasowych-przeciwko-obywatelom-id-1009

OLDMAN SAGE

6.2.7 THE USE OF THE «TACIT RESOLUTION OF THE CASE» INSTITUTION WHEN AUTHORITIES EXCEED THE INSTRUCTIONAL TIME SPECIFIED IN THE REGULATIONS[58]

Increasing the number of cases where special regulations allow for the administrative matter to be resolved by tacit approval.

WHAT IS SPRAWDZAMY CALLING FOR?

The call assumes a wider use of the so-called silent approval in administrative procedures. Currently, according to Article 122a of the Administrative Procedure Code, a case can be resolved by silence only when a specific legal provision allows it. This means that if the office does not issue a decision within the statutory deadline, the matter can be considered resolved positively in accordance with the party›s application, but only in cases explicitly indicated in the regulations. The SprawdzaMY initiative proposes increasing the number of such cases so that the silence of the office after the deadline would result in automatic approval of the citizen›s or entrepreneur›s request.

WHY DOES IT MATTER?

The current legal status in Poland means that tacit resolution of matters is rare - it applies only to a few procedures indicated in specific statutes (e.g., certain construction notifications, entries in registers, etc.). The institution of silent resolution of cases, introduced in 2017 in the Administrative Procedure Code, proved largely ineffective, as there was no extensive list of cases covered by this formula. In 2021 alone, provincial administrative courts received 17.427 complaints about the inaction of authorities (over 20% more than the previous year). The essence of the tacit approval mechanism is to mobilise offices to act within a deadline under the threat that a lack of response means the matter will be resolved in favour of the applicant.

Foreign experiences show that the principle of tacit consent facilitates the streamlining of procedures. In France, since 2015, the general rule of «silence vaut accord» - if an authority remains silent for a statutory period (usually 2 months), it means that the application is accepted. This reform reversed the previous principle (silence meant refusal) and covered over 1200 different administrative procedures - from building permits to approvals for insurance companies. In Italy, the principle of silenzio assenso was introduced in 1990 and generally, the silence of the administration is treated as the issuance of a positive decision, except in matters of particular public importance. Many other countries, including Spain, Germany and Hungary, also provide for the tacit resolution of cases in their codes of procedure. Moreover, the European Union encourages the use of this institution - for instance, the Services Directive 2006/123/EC in Article 13(4) requires member states to apply the principle of tacit approval in licensing procedures (unless reasons of public interest justify a deviation). This idea is also gaining approval in Poland - Prime Minister Donald Tusk announced that in 2025 a general rule will be introduced whereby a failure to respond in time will mean the office›s consent to a citizen›s request.

COMMENTS

Extending the institution of tacit approval would bring tangible benefits to citizens, entrepreneurs and the administration itself. It would limit the phenomenon of inactivity in offices, increasing the predictability and effectiveness of proceedings. Automatic positive resolution after the deadline would force authorities to act on time, which could strengthen public trust in the state. The implementation of this principle, however, should consider exceptions, e.g. in matters related to security or public health. The experiences of France and Italy show that it is possible to effectively cover most procedures while maintaining the necessary exclusions. This reform is in line with the direction of deregulation and simplification of the law. It will result in faster decisions, lower costs and greater administrative efficiency.

58https://sprawdzamy.com/pomysl/zastosowanie-instytucji-milczacego-zalatwienia-sprawy-przy-przekroczeniu-przez-urzedy-czasu-instrukcyjnego-zawartego-w-przepisach-id-1011

OLDMAN SAGE

6.2.8 AMICABLE DIVORCE (BY MUTUAL CONSENT), WITHOUT THE NEED TO VISIT THE COURTS[59]

Introduction of the possibility of extrajudicial dissolution of marriage by divorce before the Head of the Civil Register Office or a Notary.

WHAT IS SPRAWDZAMY CALLING FOR?

The call assumes the introduction of an alternative divorce procedure for marriages that agree on the decision to separate and are not in dispute over children or property. In such cases, the divorce could be conducted not by a court, but by a notary or the head of the Civil Register Office (USC). The Ministry of Justice is analysing two models: notarial and administrative. Both aim to simplify formalities, speed up separations in uncontested situations and relieve the courts from thousands of cases.

WHY DOES IT MATTER?

In the Polish legal system, divorce is only possible through court proceedings, regardless of the level of agreement between the parties. In 2023, over 83% of divorces were conducted without assigning blame and an estimated 60-65% were uncontested. Annually, nearly 79,000 divorce decrees are issued and the average duration of proceedings in a district court is about 13 months. In larger cities, the wait time for the first hearing can be as long as 8-10 months. The procedure requires filing a lawsuit, conducting a trial and often the participation of witnesses, which involves stress and costs for the parties and a significant burden on the courts.

According to the Central Statistical Office data, in 2020 the number of divorces per 1000 residents was 1.3 (for comparison, in 1990 it was 0.9). The rising trend is constant - divorces are becoming more frequent. It is estimated that divorces consume hundreds of thousands of court working hours annually, engaging judges, court reporters, courtrooms and administrative staff. According to the NIK report, the average duration of court proceedings is steadily increasing and delays are also affecting more complex family cases that truly require adjudication by the court.

In many European countries, alternative divorce procedures outside of court have been introduced. In France, since 2017, approximately 60,000 couples per year choose divorce through a notary (with a mandatory reflection period and the participation of lawyers). In Spain since 2015, notarial divorce has been possible for couples without children - as many as 77% of divorces there are by mutual agreement. In Greece, since 2017, divorce has been possible before a notary, but a written agreement regarding children and the participation of lawyers from both sides are required. In each of these countries, simplifying the procedure has reduced the duration of proceedings from several months to a few weeks and has effectively relieved the courts without harming the rights of the parties.

COMMENTS

Introducing out-of-court divorce could relieve family courts and speed up the resolution of uncontested cases. If half of the 79,000 divorces each year were handled administratively or by a notary, the courts would have 40,000 fewer cases to consider. At a cost of one case at the level of 1500-2000 PLN, this equates to savings of around 60-80 million PLN annually. For citizens, it means shorter time, lower costs and less stress.

Courts could focus on difficult cases and a simplified procedure - as the experiences of France and Spain show - increases the efficiency of the system. A good starting point would be a pilot for couples without children and without property disputes, with a period for reflection and the possibility of transferring the case to court in case of doubts.

59https://sprawdzamy.com/pomysl/zgodny-rozwod-za-tzw-porozumieniem-stronbez-koniecznosci-wizyty-w-sadach-id-1417

6.3 Security and defence

GWW LEGAL & TAX

6.3.1 MILITARY SHOOTING RANGES AND NOISE SUPPRESSORS - AVAILABLE TO CIVILIANS, SAFER AND MORE MODERN[60]

Regulating the legal situation in a way that unequivocally allows the use of silencers and the rental of shooting ranges and grenade launchers that are part of the immovable infrastructure of the Armed Forces for civilian training purposes. The lease should enable the organisation of long-range shooting courses and grenade throwing for citizens after fulfilling other requirements.

WHAT DOES THE CALL ENTAIL?

The call concerns amending Article 10, paragraph 5 of the Act on Firearms and Ammunition in such a way as to clearly allow the use of noise suppressors at sports shooting ranges for training and practice purposes. The current regulations are imprecise - they do not define exactly what "adapting" a weapon for the use of a silencer entails, which in practice leads to a restrictive interpretation and an effective ban on the use of silencers in civilian settings. This problem particularly affects individuals who want to improve their shooting skills in a legal and safe manner. The proposed change involves amending the current regulations or issuing a new legal act that would allow the use of noise suppressors at shooting ranges, regardless of whether the firearm is factory equipped for this purpose.

WHY DOES IT MATTER?

The use of noise suppressors has both practical and social dimensions. From a public health perspective, suppressors significantly reduce noise, protecting shooters› hearing and reducing negative impacts on the environment. In practice, noise is the most common source of local protests against the construction of new shooting ranges. Reducing this noise by using silencers could lead to greater social acceptance for the development of defence and sports infrastructure.

COMMENTS

This call is an example of a change that - although technically simple - can bring significant social and infrastructural benefits. The legalisation of noise suppressors at shooting ranges would improve the comfort and safety of users, increase the number of locations where training could be conducted and reduce tensions between investors and local communities.

This solution does not incur costs for the state budget, does not negatively affect public safety and on the contrary - it supports the development of a conscious and responsible approach to the use of firearms. Regulating this issue should be a priority if the state is serious about the need to strengthen social resilience and develop modern training infrastructure.

This issue is also important for the systemic development of safety culture and defence education in Poland. Allowing the use of suppressors would increase the functionality of shooting ranges, facilitate the organisation of training sessions, including for youth and enhance the level of training of citizens in the safe and responsible use of firearms.

It is also worth noting that many European countries - such as Austria, Denmark, Finland, Norway and the United Kingdom - allow and even recommend the use of noise suppressors, treating them as standard equipment in sports and recreational shooting. Poland remains behind in this respect and the lack of clear regulations leads to unnecessary restrictions and interpretative chaos.

60https://sprawdzamy.com/pomysl/strzelnice-wojskowe-i-tlumiki-huku---dostepne-dla-cywilow-bezpieczniej-i-nowoczesnie-id-1856

OLDMAN SAGE

6.3.2 THE POSSIBILITY OF DEDUCTING FROM CORPORATE INCOME TAX EXPENSES RELATED TO SECURITY AND DEFENCE[61]

WHAT IS SPRAWDZAMY CALLING FOR?

The proposal concerns the amendment of the Corporate Income Tax Act by adding a provision that would unequivocally allow companies to include expenses for purposes related to security, defence and crisis readiness in the cost of generating revenue. This means the possibility to deduct expenses such as the purchase of protective equipment, upgrading security infrastructure, training and exercises for employees, investments in cybersecurity systems and logistics in the event of emergencies. Currently, the settlement of such costs raises doubts - regulations require that they be related to the income and activities of the company, but the lack of detailed guidelines regarding pro-defence costs means that the tax authorities often question them. The proposed change aims to eliminate this uncertainty by clearly qualifying the indicated actions as deductible.

WHY DOES IT MATTER?

Currently, Polish business has a negligible share in the state›s defence efforts - according to data from 2023, only about 2.1% of companies were engaged in any initiatives in this area. Such low participation results, among other things, from the lack of encouraging instruments and legal uncertainty related to the possibility of accounting for such expenses within Corporate Income Tax (CIT). Meanwhile, building national resilience requires the mobilisation of the private sector as well, especially in the face of increasing hybrid threats such as cyberattacks, infrastructure sabotage, disinformation and the heightened risk of regional armed conflicts.

To illustrate the scale of the challenge, as many as 66% of Polish companies in 2023 reported at least one cybersecurity incident - showing that security threats are not an abstraction, but a real economic problem. The proposed tax relief could effectively encourage companies to invest in security, training and crisis preparedness, thereby increasing the resilience of the entire country.

This kind of solution is already in place in other countries. In France, there is a tax relief that allows businesses to deduct 60% of the costs of providing employees who serve as volunteer firefighters or military reservists - up to a limit of 0.5 per mille of annual turnover. It is a mechanism that genuinely rewards the participation of business in defence structures. Estonia, in turn, announced the introduction of a special 2 percent «defence tax» on company profits, the revenues from which are to support the state›s defence budget. In Switzerland for decades, the ‹universal resilience› model has been in place, which requires companies to provide infrastructure (e.g., shelters) and allows employees to participate in military or civil service during peacetime.

COMMENTS

The proposed CIT relief may effectively support the resilience of the state. Even with moderate interest (5-10% of companies), the cost to the budget would not exceed several hundred million PLN annually, which, given over 80 billion PLN in corporate income tax revenues, constitutes a minor burden. In return, the state would gain private investments in security and readiness.

It will be crucial to clearly define the rules to avoid abuses and disputes. Precise definitions and uniform guidelines are needed. It would also be helpful to create a register of qualified expenses, such as a list of certified training and investments, agreed upon with the Ministry of National Defence and services. A well-designed relief can increase companies› engagement in defence activities and improve business cooperation with the state.

61https://sprawdzamy.com/pomysl/inwestycje-firm-w-bezpieczenstwo-bedzie-mozna-latwiej-odliczyc-od-podatku-id-2344

OLDMAN SAGE

6.3.3 REFORM OF THE TARGETED SUBSIDY SYSTEM TO COVER THE COSTS INCURRED BY ENTREPRENEURS IN THE IMPLEMENTATION OF TASKS FOR THE ARMED FORCES[62]

The rules for allocating targeted grants to cover the costs incurred by entrepreneurs in the implementation of tasks for the Armed Forces and included in the Plan to secure the needs of the Armed Forces carried out by entrepreneurs are insufficient and do not meet the realities of the market economy and the defence needs of the state.

WHAT IS SPRAWDZAMY CALLING FOR?

The call concerns the amendment of the Regulation of the Minister of National Defence of 24 May 2022 on targeted subsidies for entrepreneurs carrying out tasks for the military. This would mean including in the subsidy formula factors such as fixed costs of maintaining infrastructure and staff, readiness level for immediate production and factors such as possessing unique technologies, production potential, or previous involvement in defence programs. The subsidy would no longer be a simple function of working hours, but would become a tool supporting key industrial capabilities for defence.

WHY DOES IT MATTER?

Over 60% of companies in the defence sector declare that current subsidies do not cover even half of the costs of maintaining production capacities and readiness. The Ministry of National Defence estimates that between 2020 and 2030, state aid will meet only about 30% of the real needs of mobilisation companies. As a result, the majority of the company›s fixed costs are covered independently, leading to a reduction in activities or a withdrawal from participation in mobilisation programs. Without stable support, we risk losing key capabilities and technologies to other industries or abroad. Companies need funds not only for readiness but also for production materials - the proposed changes are intended to provide them with real support.

It is worth considering a new subsidy model based on an algorithm that would include a basic component - covering the fixed costs of infrastructure and personnel - and a variable one, dependent on participation in military tasks. Such a bonus structure would reward companies with high technological readiness, even with a smaller volume of orders.

Examples from other countries demonstrate the effectiveness of such an approach. In the USA, the Defense Production Act exists, enabling support for strategic suppliers. Estonia has created a technology fund (approximately 100 million euros) supporting producers from the cybersecurity and advanced technology sectors. France has implemented a production reserve, including experienced specialists ready to support production and training during a crisis. These mechanisms show that systemic support for the defence industry is becoming a standard in NATO security policy today.

COMMENTS

The proposed reform could significantly strengthen the national defence potential and secure the supply chain for the military in crisis situations. Stable financing of mobilisation companies increases the chances that, if needed, the appropriate production resources and skills will be available. A more complex algorithm for granting subsidies - taking into account the real costs and strategic importance of companies - may, however, encounter obstacles, including institutional resistance and budgetary constraints. Although the planned increase in the subsidy pool to PLN 535 million in 2026 is a step forward, it may still be insufficient given the needs.

A good solution might be to start implementing the new model from a pilot in the IT and military logistics sectors, where it›s easier to assess the effects and needs. Gradual increases in the fund and the development of a transparent algorithm for the allocation of resources, in collaboration with the industry, will enhance the system›s efficiency and credibility among companies.

62https://sprawdzamy.com/pomysl/sprawiedliwsze-dotacje-dla-firm-wspierajacych-wojsko-uwzglednia-realne-koszty-id-2414

6.4 Digitisation and telecommunications

6.4.1 EQUATING THE IMPORTANCE OF ELECTRONIC DOCUMENTATION WITH PAPER DOCUMENTATION[63]

Enabling the equal legal power of digital documents with paper documents.

WHAT IS SPRAWDZAMY CALLING FOR?

The change proposed by SprawdzaMY assumes the equalisation of the legal power of digital documents with paper ones in the areas of administration and economic trade. The main assumption is that citizens should be able to freely choose the form of the document, without worrying about its validity or acceptance by the authorities.

WHY DOES IT MATTER?

According to a study conducted by the European Commission, Digital Decade[64], 81% of Polish women and men believe that the digitisation of public and private services makes their lives easier. At the same time, the Digital Economy and Society Index (DESI) for Poland[65] in terms of the availability of digital public services for businesses and citizens ranks us respectively third from last and second from last in the European Union.

In the era of rapidly developing digitisation of everyday life, maintaining the requirement to use written form and paper documents in many administrative and business transactions is an unjustified anachronism. Poles are keen to use public e-services and the public administration should keep up with the times and enable them to do so. This type of solution will make it easier for citizens to contact administrative bodies, providing them with greater convenience and flexibility, but above all, it will speed up the handling of official matters. Ultimately, the development of digital solutions can be a stimulus for a modern economy and allow for the fuller utilisation of the potential offered by the era of digitisation. Thanks to this, Poland will not only consolidate its image as an innovative country, but above all, it will improve the quality of life of its citizens.

COMMENTS

We take a positive view of the proposed change. Full digitisation of documents is the direction of development towards which the current reality is heading. This project is part of the ongoing digitisation in the European Union, implemented in particular within the framework of the European Digital Identity project[66]. This is also an opportunity to improve the functioning of the state and to provide greater convenience for citizens in handling their daily affairs. Polish citizens are keen to use electronic solutions, such as e-prescriptions, e-invoices, ePUAP, mObywatel, or BLIK payments, which shows that they are ready for such solutions, but also that these solutions are proven to work in practice. Partial digitisation can already be seen in other areas of law, for example, prosecutors are digitising the files of more extensive cases. Similarly, electronic communication is widely used in tax administration.

Digitisation eliminates the need for printing, sending and archiving paper documents, which translates into significant cost savings for businesses and administrations. The main advantage, however, is the improvement and acceleration of the administration›s functioning. Digital documents can be transmitted and processed instantly, making the circulation of documents in electronic form much faster than traditional paper correspondence. Furthermore, foreign investors, seeing Poland as a modern and digitally friendly country, might be more willing to invest capital in our nation, which would contribute to the growth of economic development.

However, it should be remembered that aligning electronic documentation with paper documentation requires the introduction of secure digital systems and is associated with substantial financial investments in IT infrastructure, software, training for officials and citizens and ensuring data security. The proposed change is therefore highly desirable, but requires responsible and thoughtful implementation, time and appropriate financial resources.

63https://sprawdzamy.com/pomysl/zrownanie-waznosci-dokumentacji-elektronicznej-z-papierowa-id-1013/
64SPECIAL EUROBAROMETER 551 The Digital Decade EUROBAROMETER Annex Fieldwork: March - April 2024, source: https://europa.eu/eurobarometer/surveys/detail/3174
65source: https://digital-decade-desi.digital-strategy.ec.europa.eu/s/w81252Yn94xoG/
66https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/european-digital-identity_pl

OLDMAN SAGE

6.4.2 ELECTRONIC EMPLOYMENT CONTRACTS - CONVENIENCE AND SAFETY FOR EMPLOYEES[67]

Adapting labour law regulations to current technological capabilities.

WHAT IS SPRAWDZAMY CALLING FOR?

We propose full digitisation of the process for concluding employment contracts, including annexes and agreements. This means moving away from the requirement of paper forms in favour of electronic forms, for example, using a qualified signature, an electronic ID, or a Trusted Profile. Today, the law still requires a handwritten signature or a qualified electronic signature, which in practice is used marginally. Amending Article 29 of the Labour Code and other regulations would allow contracts to be concluded and modified remotely, with integration with ZUS, KRS, and CEIDG. This would adjust the labour market to digital realities - just as is already the case with civil law contracts.

WHY DOES IT MATTER?

In Poland, over 6 million new employment contracts are concluded every year. The requirement for a physical signature generates enormous costs - in terms of time, administration and the environment. In the era of remote and hybrid work, it prolongs the recruitment process, especially in the case of candidates from outside large cities. At the same time, over 16 million Poles already have a Trusted Profile and 10 million are using the mObywatel app. So, we have the technological infrastructure, but labour law is not keeping up with it.

Meanwhile, since 2002, Estonia has enabled the signing of contracts electronically - each year, over 100 million e-signatures are made there and 98% of citizens use an e-ID. In Finland, the lack of a requirement for a handwritten signature allows employment contracts to be concluded electronically without additional requirements. Germany, France and Spain recognise the qualified electronic signature (QES) as equivalent to paper and commonly use it in HR documentation. In 2023, the Czech Republic liberalised its laws, allowing contracts to be signed with a regular electronic signature, provided the employee consents - it is enough to send the document to their private email address.

The experiences of these countries show that digitisation in the area of labour law not only increases security and reduces the time for formalities, but also strengthens market competitiveness and reduces burdens for offices and HR departments. The integration of e-contracts with state systems, as planned in Poland, could mean automatic registrations with ZUS (Social Insurance Institution) and other registries, which would simplify HR procedures and reduce the risk of errors.

COMMENTS

The proposal to introduce electronic employment contracts is deregulatory in nature and responds to the needs of the modern labour market by simplifying procedures without lowering employee protection standards. Poland already has the appropriate technological infrastructure - Trusted Profile, e-ID, or the mObywatel app - which enables the secure implementation of digital solutions in employer-employee relations.

The current regulations require a physical signature, which slows down HR processes and is inadequate for the realities of remote or hybrid work. It is necessary to amend labour law to enable the recognition of electronic signatures - qualified, personal, or trusted - as fully valid in the conclusion of contracts.

Changes can be implemented in stages, allowing for the parallel use of paper forms during the transition period and offering support for those who are digitally excluded. It will be crucial to develop a new model in cooperation with employers, employee organisations and the administration. This type of reform can significantly simplify document circulation, reduce administrative costs and increase employment flexibility - thus improving the competitiveness of the labour market.

67https://sprawdzamy.com/pomysl/elektroniczne-umowy-o-prace---wygoda-i-bezpieczenstwo-dla-pracownikow-id-1108

OLDMAN SAGE

6.4.3 mOBYWATEL WITH DIGITAL INSTEAD OF PLASTIC DOCUMENTS - THE DIGITAL REVOLUTION IN DOCUMENTATION[68]

Enabling the crossing of the border of the Republic of Poland with European Union countries by presenting only a digital ID card. Simplification of the rules for using mObywatel for persons under 18 years of age. Organising regulations concerning the status of a doctoral student›s mLegitymacja. Organising the regulations concerning the status of a student›s mLegitymacja.

WHAT IS SPRAWDZAMY CALLING FOR?

The call assumes the extension of the functionalities of the mObywatel application so that it becomes a universal digital wallet for identity documents and other important certificates. This ultimately means replacing traditional plastic documents (ID card, driving licence, various passes, etc.) with their electronic equivalents on a smartphone. In practice, a citizen could use only a mobile application to verify their identity and present the required documents both in dealings with public administration and with private entities. The proposal also includes tightening integration with the private sector, so that banks, insurers, medical facilities and service companies can easily verify citizen data through mObywatel and honour digital documents instead of physical ones.

WHY DOES IT MATTER?

The mObywatel app is enjoying increasing popularity - it is already used by over 9 million people (approximately 1/4 of the society). It enables convenient access to digital documents and services, allowing Poles to verify their identity and handle official matters without plastic cards. As of September 2023, the digital document mObywatel (mID) is formally equivalent to a personal ID card (with the exception of crossing the border and issuing a new document). This means that it must be honoured not only by public institutions but also private ones (e.g., banks or the post office). However, many procedures still require physical versions and some citizens do not use the applications. It is crucial to ensure the interoperability of full integration of public and private systems with mObywatel, for example, through automatic QR code verification.

In many countries, digital identity systems operate successfully. In Estonia, 98% of citizens have an e-ID, of which 70% use it regularly and since 2002, over 600 million electronic documents have already been signed. In the United Arab Emirates, the UAE Pass app has 10.8 million users and provides access to 15,000 services, handling 2.6 billion transactions annually. In Singapore, Singpass serves 97% of residents and 2000 public and private services. Thanks to integration with the MyInfo platform, banks can automatically obtain customer data, which reduces the account opening time by 80% and cuts the cost of processing an application by about 50 dollars.

COMMENTS

Digital documents offer a real chance to simplify administration and provide convenience for citizens. In Estonia, e-ID and electronic signatures bring savings of around 2% of GDP annually. In Poland, the popularisation of mObywatel could have similar effects - less paper, faster procedures, shorter queues. For users, it means having documents available on their phone, the ability to handle matters online and no risk of losing them. The increasingly widespread use of the mID in the private sector facilitates the automatic filling of applications and the conclusion of contracts.

It is important to implement common standards and further integration with banks or insurers. The system must also be secure - data well encrypted and access protected by biometrics or a PIN. At the same time, care must be taken for those who are digitally excluded - in 2023, only 44% of Poles had basic skills and among seniors, only 13%. Solutions must include alternative forms of service and support for less proficient users.

68https://sprawdzamy.com/pomysl/mobywatel-zamiast-plastikowych-dokumentow---cyfrowa-rewolucja-w-dokumentach-id-1538

GWW
LEGAL & TAX

6.4.4 mPENSION - ALL THE DATA ABOUT YOUR PENSION IN ONE PLACE[69]

Providing citizens once a year in the mObywatel app with information about their funds accumulated in pension programmes.

WHAT IS SPRAWDZAMY CALLING FOR?

The «mEmerytura» initiative proposes to provide citizens annually with full information about the funds accumulated in the pension system - both public (ZUS) and private savings forms (OFE, PPK, PPE, IKE, IKZE) - using the mObywatel app. Currently, this data is dispersed across various institutions and IT systems and many people lack knowledge about the accumulated value of the funds gathered. The proposal suggests that financial institutions and the Social Insurance Institution (ZUS) would provide, once a year (as of 31 December), static information about a client›s balance, which would be aggregated and presented to the user of the mObywatel app.

WHY DOES IT MATTER?

Currently, citizens have access to ZUS data through the Electronic Services Platform (PUE) and to data from OFE, PPK, or IKE - through individual websites of specific financial institutions. However, there is a lack of one central source of information. In practice, this means that many people do not know what pension they can receive or what funds they have already accumulated. Meanwhile, over 9 million Poles use the mObywatel app - making it a natural channel to deliver this type of data to citizens in a comprehensible, convenient and secure manner.

COMMENTS

The importance of the call increases in the context of systemic challenges: forecasts indicate that the replacement rate of pensions paid by the Social Insurance Institution (ZUS) will gradually decrease, which means that these benefits may not be sufficient to maintain the current standard of living after retirement. Increasing knowledge about the state of pension savings may encourage citizens to engage in more conscious financial planning and to increase voluntary savings. Indirectly, greater involvement in private forms of pension saving can also boost the Polish capital market, supporting investment and economic development.

The proposal does not involve the creation of an expensive system like the Central Pension Information (CPI) - whose concept is currently being withdrawn from the legislative process - but is limited to a simple, annual compilation of data from financial and public institutions. Such an approach significantly reduces the costs of implementation and the risks associated with data security, while simultaneously enabling citizens to better understand their pension situation.

The implementation of the call will require legislative changes (including the Act on the Social Insurance System, the Act on Employee Capital Plans, on pension funds, Employee Pension Schemes, Individual Retirement Accounts and Individual Retirement Security Accounts), in terms of introducing the obligation to provide information to the mObywatel operator. Technically, implementation should not be difficult - both ZUS and private institutions have experience in reporting data and the mObywatel app regularly expands its range of services.

It is worth noting that similar solutions are in place abroad. For example, in the UK, users of the NEST system can obtain a consolidated summary of their savings from various sources using a single login. Although OPZZ expressed opposition to the proposal, pointing to a possible conflict with the process of repealing the CIE, the proposed change is of a different scale and nature - it is definitely simpler, less costly and feasible to implement in a short time frame.

In summary, «mEmerytura» is a solution that responds to the real informational needs of citizens and the challenges of the pension system. It will benefit individual users, the financial sector and the entire economy - without burdening the state budget. This is an example of smart digitisation of public services, increasing transparency, trust and financial accountability of citizens.

69https://sprawdzamy.com/pomysl/memerytura---wszystkie-dane-o-twojej-emeryturze-w-jednym-miejscu-id-1610

GWW LEGAL & TAX

6.4.5 FASTER INTERNET ACCESS - FEWER FORMALITIES FOR OPERATORS[70]

Removing investment barriers: 1. The legal title to use a property is necessary for the joint use of the technical infrastructure already located on the property. 2. No right to use the electricity available on the property for the purpose of powering the telecommunications equipment located on the property and no right to construct a private electrical connection on the property.

WHAT DOES THE CALL ENTAIL?

The call concerns the amendment of the provisions of Article 17 and 33 of the so-called Mega Act in such a way that a telecommunications entrepreneur, who has gained access to the existing technical infrastructure (e.g., cable ducts) under Article 17, automatically also has the legal right to use the property on which this infrastructure is located. Similarly, it is proposed that Article 33 should clearly allow not only the installation of infrastructure on a property but also access to the power supply for network devices - by using the energy already available on the property or by constructing their own power connection.

WHY DOES IT MATTER?

The current legal status requires that, in addition to an agreement on the joint use of infrastructure, the entrepreneur must obtain separate consents from property owners each time - for example, to introduce a cable into the existing sewage system or to use energy. Even if the infrastructure is already on the plot (with the owner›s consent), repeatedly signing further agreements in practice slows down or even blocks the implementation of telecommunications investments, especially in rural and dispersed areas.

An additional barrier is the difficulty in obtaining approvals to connect telecommunications equipment to power supplies, which often leads to situations where the constructed network becomes useless due to the lack of power supply options.

COMMENTS

The call is crucial for accelerating the development of digital infrastructure, especially in less populated areas where telecommunications investments are the most difficult to implement. The data collected in the documents indicate that one investment can cover even several hundred plots of land - signing that many separate agreements is a real barrier to the development of fibre optic networks or 5G.

Similar solutions are already in operation in other countries, for example in the United Kingdom - according to the Electronic Communications Code, operators can run cables over private plots without obtaining the owner›s permission each time, provided they do not physically enter the land and certain conditions are met (e.g., the cable must be at a specific height above the ground).

Arguments about interference with property rights are raised by some groups, but it is important that the proposed change does not concern situations where infrastructure would be introduced without consent - it only concerns the use of an already existing network and the consent already given by the owner.

The proposed change to the Mega Act aims to remove unnecessary bureaucratic and legal barriers in telecommunications investments, without infringing on the essence of property rights. Thanks to such a change, it will be possible to efficiently use existing infrastructure and accelerate the digitisation of the country, especially in disadvantaged areas. Introducing regulations in the style of the British serves as a good example of modern, pro-investment regulatory policy.

70https://sprawdzamy.com/pomysl/szybszy-dostep-do-internetu---mniej-formalnosci-dla-operatorow-id-1344

6.5 EU law

DZP
więcej niż prawo

6.5.1 AI ACT REGULATIONS - AI COMPETITIVENESS IN POLAND[71]

WHAT IS SPRAWDZAMY CALLING FOR?

The call concerns the implementation and ensuring the application of regulations related to AI in order to develop artificial intelligence in Poland.

WHY DOES IT MATTER?

The existing legal frameworks concerning AI systems at the EU level were not adapted to the dynamic development of artificial intelligence technology. Although certain aspects of AI systems› operation were covered by general regulations (e.g. GDPR, consumer law, civil law), there was a lack of a comprehensive approach to the risks associated with AI. The result of this were inconsistent practices in areas such as conformity assessment, market surveillance and also legal uncertainty for creators, suppliers and users of such technologies. The European Parliament and Council Regulation (EU) on harmonised rules for artificial intelligence (the «AI Act») represents the first comprehensive legal act in this field, aimed not only at ensuring safety and protection of fundamental rights, but also at supporting the innovative development of AI in the EU.

The AI market in Poland and the European Union is rapidly developing. At the same time, public awareness and concerns about the impact of AI on civil rights are growing. Previous legislative initiatives in the USA, the United Kingdom, or Canada have been fragmentary in nature. The AI Act could become a global regulatory model - much like the GDPR did before. Ensuring the full implementation of the AI Act regulations in Poland will enable an increase in social trust and international competitiveness of AI solutions. Poland also has the opportunity to shape a model implementation approach in relation to the AI Act. For example, it will be essential to establish appropriate supervisory bodies, build institutional competences and support SMEs in compliance with new regulations. The implementation of the AI Act could also be a catalyst for a structured national debate on the future directions of AI development.

COMMENTS

The AI Act is a groundbreaking piece of legislation aimed at regulating the development, deployment and use of AI systems within the territory of the European Union. Although the regulation is directly applicable, its effective implementation in Poland requires the creation of national legal and institutional frameworks - particularly in terms of supervision, law enforcement procedures and the adaptation of existing sector-specific regulations. In Poland, these issues will be regulated in the Act on Artificial Intelligence Systems, which is being developed by the Ministry of Digital Affairs.

Key to ensuring the implementation of the AI Act is the designation of Polish market surveillance authorities, especially in sensitive areas such as education, employment, the judiciary, migration, or public services. The draft bill provides for the establishment of the Commission for the Development and Security of Artificial Intelligence and the assignment of additional competences to the President of the Personal Data Protection Office. This solution seems appropriate, but it requires a clear definition of competencies, human resources and cooperation procedures between institutions.

The impact of the proposed AI Act regulations will be broad - affecting both the public and private sectors. It will enforce not only the technological compliance of AI systems with the requirements of the AI Act, but also the implementation of accountability mechanisms, algorithmic auditing, documentation and transparency. For many entities - especially SMEs - this may mean an increase in costs and administrative barriers, which requires the preparation of various support instruments (e.g., EU funds, simplified procedures, regulatory sandboxes). The implementation of the AI Act will also require the development of an AI competence ecosystem both in administration and in the private sector. This concerns not only IT professionals but also lawyers, managers and public health sector workers who will be using AI-based systems.

In the further work related to the implementation of the AI Act regulations, it is important to take into account market realities to avoid overburdening innovative entities, proper preparation of regulations to create regulatory sandboxes that support the development of safe and legally compliant innovation and to ensure conditions for the development of a high level of education and digital competencies in AI for public administration, private entities and citizens. It is also necessary to properly define the competencies, human resources and cooperation procedures between the supervisory units designated in the draft law on artificial intelligence systems and those already existing in the market.

In summary, the implementation of the AI Act in Poland is a great opportunity to organise the development of AI. National regulations should strive to ensure a balance between protecting the rights of citizens and supporting innovation and economic competitiveness.

71https://sprawdzamy.com/pomysl/przepisy-ai-act---konkurencyjnosc-ai-w-polsce-id-1017

DZP
więcej niż prawo

6.5.2 COUNTERING THE PHENOMENON OF «GOLD-PLATING» IN THE PROCESS OF IMPLEMENTING EUROPEAN UNION LAW[72]

WHAT IS SPRAWDZAMY CALLING FOR?

The call concerns limiting the practice of excessive implementation of European Union law into the Polish legal order. It concerns the so-called gold-plating, which involves introducing national regulations that go beyond what is required by EU law and are not necessary for ensuring its effective implementation in Poland.

The call is for:

- introduction of a ban on the implementation of EU regulations to a wider extent than is required and
- a review of national regulations implementing EU law aimed at removing excessive regulations.

WHY DOES IT MATTER?

Expansive implementation of European Union law - when it involves imposing new duties or restrictions not required by EU regulations - increases the costs of conducting business and creates new regulatory burdens for entrepreneurs. This weakens their position in relation to entrepreneurs from other countries, where this phenomenon does not occur or occurs to a lesser extent, thereby disrupting the competitive balance within the single market. Overregulation means higher implementation costs and operating costs. It reduces the investment attractiveness of the Polish market compared to other EU member states, where - in the absence of regulations stricter than those at the EU level - these costs may be lower. This results in the disruption of the uniformity of the single market and its fragmentation and also threatens the uniform application of EU law.

The issue concerns all sectors of the economy and industries that have been covered by EU harmonisation. It occurs mainly in the process of law-making, although it can also result from the practice of interpreting and applying Polish regulations by national authorities or courts. It particularly concerns the process of implementing directives that require enactment through the issuance of an appropriate national law (an act or regulation), but it also occurs in «near-regulatory» acts, which are intended to ensure the application of EU regulations.

So far in Poland, no coordinated actions have been taken to reduce gold-plating. The reverse compatibility table, used in the government legislative process for projects implementing EU law, has its significant limitations. The amendment to the Ministers› Work Regulations adopted in May 2025 introduced a requirement to include in the Regulatory Impact Assessment attached to such acts information on regulations that go beyond the minimum EU standards. This solution serves to increase the transparency of the process of adopting such regulations. However, it is not equivalent to limiting their introduction - nor to the requirement of additional, special justification for proposals that «extend» EU regulation.

COMMENTS

Gold-plating is a complex phenomenon, therefore each case of deviating from the EU minimum should be assessed individually. It is crucial to provide appropriate justification and thorough analysis of the effects of a given deviation - at the stage of designing national regulations. Aware of these conditions, we will treat gold-plating differently when its balance is positive and the deviation is justified by a real need, the specifics of the national market or legal system, or by an important public interest - differently from unnecessary and unjustified overregulations, which are an obvious obstacle to business development.

To limit the negative impact of gold-plating, action must be taken in two ways: reactively and preventively. Follow-up actions include the identification and analysis of overregulation that already exists in the Polish legal system and the removal of excessive regulations where it will be beneficial and justified. Preventive actions require changes in the law-making process - systematic solutions that at least:

- enable the identification of proposals going beyond the minimum EU standards at the earliest possible stage of the legislative process.
- impose on the drafters the obligation to provide a detailed justification for each proposal that constitutes a deviation from the «EU+0» principle, including a dedicated, in-depth analysis of their possible effects within the framework of the Regulatory Scrutiny Board.
- provide social partners, including representatives of entrepreneurs, with appropriate tools and time to present their position, including guarantees of inclusion in the public debate around the proposed changes and will oblige the drafters to address the comments submitted in detail.
- cover all phases of the legislative process (governmental and parliamentary) and uniformly all types of submissions (i.e., government, parliamentary, committee, senate, presidential and citizens› initiatives).

72https://sprawdzamy.com/pomysl/egzekwowanie-zasady-unia-europejska-zero---brak-dobudowywania-krajowych-przepisow-do-dyrektyw-unijnych-id-1012

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6.5.3 LONGER PERIOD FOR COMPANIES TO ADAPT TO EU REQUIREMENTS IN THE FIELD OF CRYPTOCURRENCIES[73]

The shortening (planned) by the Polish legislator of the transitional period (grandfathering clause) provided for in Article 143(3) paragraph one of MiCA for entities operating in the field of crypto-assets.

WHAT IS SPRAWDZAMY CALLING FOR?

The aim of the call is to extend the transition period to prevent the outflow of capital from Poland and to ensure that entities operating in the crypto-assets market have a smooth transition to the new regulatory model, while respecting constitutional principles such as legal certainty, protection of trust and acquired rights[74].

WHY DOES IT MATTER?

Problem diagnosis:

Current legal status

The draft bill on the crypto assets market dated 8 May 2025 («the Draft») assumes the adaptation of the Polish legal system to Regulation 2023/1114 on the crypto assets market («MiCA»), defining, among other things, transitional provisions regulating the situation of entities conducting activities before the entry into force of MiCA. In accordance with Articles 162-164 of the Project, these entities will be able to continue operations without a permit only:

- for a period of 4 months from the date of entry into force of the act,
- for a period of 9 months from the date of entry into force of the act, before the expiry of 3 months from the date of entry into force of this act, the entity shall submit a complete application for a permit.

Practice

The legislator assumes an irrationally fast adaptation of the national regime to the MiCA rules. In practice, however, the short time available to prepare documentation, adjust operations and meet the procedural requirements of MiCA is exceptionally difficult to implement, especially for SMEs and tech startups without a compliance background.

System context and effects

The transitional period in the Project does not fully utilise the maximum transitional period permitted by MiCA, i.e., until 1 July 2026. This results in the period of possible operation without a permit being reduced to just a few months.

This increases the risk of disrupting the operations of many currently existing smaller entities, which may not have time to implement the required procedures in accordance with the new requirements or obtain the necessary permits. This threatens to push companies that are unprepared for too rapid a transformation out of the market and it may also lead to the loss of investments, a decrease in competitiveness and a reduction in the supply of services for customers. At the same time, the Polish Financial Supervision Authority (KNF) will be forced to act under time pressure in terms of receiving, verifying and considering a large number of applications within an inadequately short period, which generates a potential threat to market stability.

Additionally, the legislator has provided for a «striking off ex officio» mechanism without the need to issue an administrative decision or inform the entity, which may raise allegations of violating constitutional guarantees of the right to defence and legal certainty and may also lead to limiting the availability of services for end-users and weakening the competitiveness of the domestic market compared to member states that have adopted a longer adjustment period.

Consultations

Earlier environmental consultations highlighted the inadequacy of the proposed timelines and the lack of compliance with EU transitional frameworks. The extension of the adjustment periods until 1 July 2026 was widely advocated in industry and expert circles.

COMMENTS

Adopting the current Project, especially the short transition periods, will have a significant impact on the functioning of the entire crypto-asset services sector in Poland. The reduction of the transition period to 4-9 months (depending on the submission of the application for permission) assumed by the legislator means that businesses must irrationally quickly adapt to the comprehensive and technically advanced requirements arising from MiCA and national regulations.

It is fully justified to extend the transition period for service providers within the framework of Polish legal order to the maximum period allowed under MiCA, which is until 1 July 2026.

73https://sprawdzamy.com/pomysl/dluzszy-okres-na-dostosowanie-sie-do-wymogow-ue-dla-firm-w-zakresie-kryptowalut-id-1204

74The legal status in the area under discussion should be considered uncertain. Legislative work on the act has been ongoing for months and the transitional provisions have been changed multiple times and are still the subject of analysis and interdepartmental agreements. The final version adopted by the parliament is missing and thus it is not determined whether the proposed date of entry into force of the act will effectively shorten the transition period in accordance with MiCA. In this regard, our analysis pertains solely to the draft bill dated 8 May 2025, which is currently under reconsideration by the Standing Committee of the Council of Ministers.

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6.5.4 REPORT: GOLD-PLATING AND OVER-REGULATION IN THE IMPLEMENTATION OF EU LAW INTO THE POLISH LEGAL SYSTEM[75]

The report was prepared as part of the SprawdzaMY initiative on behalf of the Entrepreneurship Support Foundation by experts from the Regulatory Advisory, Legislation and Compliance Practice of DZP Law Firm. The aim of the report is to describe the phenomenon of «gold-plating» and overregulation, which refers to the excessive or expansive implementation of European Union law into the Polish legal system and to illustrate it with examples from various areas of law. The report presents 100 examples of broadly understood gold-plating, which have been divided into two groups: examples with cross-industry impact and «sectoral» examples, which include: capital markets and funds; banking, payment services and other financial services; crypto-assets; public procurement; healthcare, medicine and pharmacy; ESG, reporting, environmental protection; telecommunications, media, intellectual property law; transport, shipping, logistics and regulated products.

WHY DOES IT MATTER?

Gold-plating occurs when a national legislator - in the course of or in connection with the implementation of EU law - introduces new, additional, or more far-reaching regulations that are not necessary for the implementation of EU provisions and ensuring their effectiveness. This phenomenon is generally considered harmful, especially when exceeding the EU «minimum» is not adequately justified (e.g., by the need to protect a specific, important public interest, or the specifics of the Polish legal system or the normative context of a given legal institution). The result of gold-plating is «over-regulation», which means increasing the regulatory burdens for the recipients of national regulations in relation to EU requirements. Unjustified overregulation creates barriers to business development and negatively affects the competitiveness of domestic entrepreneurs, the investment attractiveness of the Polish market and the uniform application of EU law, leading to fragmentation of the EU market.

Poland has not yet undertaken coordinated actions to reduce the negative impact of gold-plating, unlike some EU member states. Good practices in this area are set, in particular, by Germany, where since 2006 the National Council for Law-Making Control has been operational, advising the government and parliament on improving the quality of legislation and reducing bureaucracy. In February 2025, the German Bundesrat also adopted a resolution concerning the strengthening of the single market and the fight against bureaucracy, which, among other things, calls on the government to stop gold-plating. In Austria, after the adoption of the «Anti-Goldplating Act» in 2019, an evaluation of national law was carried out, as a result of which 11 laws were amended to remove excessive reporting and permitting obligations. In France, the deregulation campaign aimed at instances of gold-plating covered more than 20 changes in regulations that affected the competitiveness of domestic business.

COMMENTS

The deregulation initiative is an excellent opportunity to start a systemic discussion in Poland about combating gold-plating and the excessive implementation of European Union law. For entrepreneurs, the opportunity to operate within a common market should be a source of opportunities, stimulating competition and innovation. National law - especially the law that is supposed to implement EU regulations - should not create barriers to business development, particularly when this is not required by EU law.

The need for systemic reflection on the standards of EU law implementation in Poland is growing as harmonisation progresses and as EU law extends to new areas, including new economic sectors. When the competitiveness of Polish enterprises, business confidence in the law, investment development and the creation of new jobs are at stake, reducing gold-plating becomes an urgent and necessary task for the state. It is necessary not only to identify and eliminate manifestations of unnecessary over-regulation - it is also essential to develop effective mechanisms to prevent its occurrence. It is worth starting with a review of the regulations and practices related to the law-making process - both procedural and constitutional (e.g., the Rules of Procedure of the Council of Ministers or the Principles of Legislative Technique), as well as those concerning the implementation of EU law (e.g., the Act on the Committee for European Affairs, or the Act on Cooperation of the Council of Ministers with the President of the Republic of Poland and the Sejm and the Senate in matters related to the membership of the Republic of Poland in the European Union).

75https://sprawdzamy.com/static/files/gold-plating-maj-2025.pdf

6.6 Health and social services

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6.6.1 DIGITAL OCCUPATIONAL HEALTH CERTIFICATES - FASTER, MORE CONVENIENT AND WITHOUT UNNECESSARY BUREAUCRACY[76]

Deregulation and digitisation of occupational medicine rulings: simplicity, safety, modernity.

WHAT IS SPRAWDZAMY CALLING FOR WITH REGARD TO DIGITAL OCCUPATIONAL HEALTH CERTIFICATES?

The deregulation team proposes full digitisation of occupational medicine doctors› rulings, thereby eliminating the need for physical delivery of the document to employers. Additionally, it recommends the abolition of the requirement to obtain a new certificate when changing employers (for the same position). The proposed changes aim to accelerate HR processes in companies, enhance the protection of personal data and reduce the burden on employees and medical examiners.

WHY DOES IT MATTER?

Currently, occupational medicine decisions are usually issued in paper form and are provided to employers in this form. Employees must undergo a re-examination before being allowed to perform the same type of work with another employer, even if their previous certificate would still be valid.

Issuing rulings in electronic form is currently permissible but rarely practised due to the lack of convenient solutions that facilitate the use of such an option for adjudicators, employees and employers.

Poland is one of the leaders in digitisation and simplifying processes in state-citizen relations. Employers, on the other hand, are faced with the challenge of optimising and accelerating HR processes, while simultaneously increasing the level of automation and protection for employees.

The digitisation of occupational health physicians› certificates and the abolishment of the requirement to obtain a new certificate before being allowed to perform the same type of work will simplify the circulation of documents, which will contribute to increased protection for workers by minimizing the risks associated with transmitting and storing paper certificates, thereby relieving all parties involved in this process.

COMMENTS

A change in this area will certainly have a positive impact on the safety and comfort of employees. Simplifying the acquisition of occupational medicine certificates is a positive step towards increasing employment accessibility and accelerating recruitment and HR processes. In this regard, it would also be appropriate to extend this demand to increase the availability of electronic access to all documents that may be necessary in the employment process.

76https://sprawdzamy.com/pomysl/cyfrowe-orzeczenia-medycyny-pracy---szybciej-wygodniej-i-bez-zbednej-biurokracji-id-1404

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6.6.2 END OF CHAOS IN DOCTOR REGISTRATION - ONE, CONVENIENT ONLINE QUEUE[77]

Queues for doctors (healthcare) under the National Health Fund (NHF).

WHAT IS SPRAWDZAMY CALLING FOR?

The call concerns the creation of a central, unified online queue system for doctors, which would aggregate information about available appointments with various healthcare providers - both public and private. The proposal envisages the elimination of dispersed registration systems (separate helplines, facility systems, portals), introducing a single search engine and the ability to sign up for a queue regardless of the service location. This system would facilitate access to medical services, reduce waiting times and decrease the number of «dead souls» in queues (people registered multiple times or not cancelling appointments).

WHY DOES IT MATTER?

The current legal state allows service providers to operate their own, independent registration systems, which in practice leads to informational chaos and lack of transparency. Patients often register for several queues at the same time and the system does not eliminate inactive applications, which distorts data about waiting times. Moreover, many people struggle with accessing up-to-date information about available appointments.

From a systemic perspective, the proposed solution would favour better health policy planning, more efficient resource utilisation and improved access to services. In the EU perspective - although e-health is not fully harmonised - many countries are developing integrated registration systems. Poland can be a positive example in this respect.

COMMENTS

From a legal standpoint, the proposal aims to increase the transparency and efficiency of the healthcare system, which directly aligns with the constitutional principle of equal access to healthcare services (Article 68(2) of the Constitution of the Republic of Poland). The standardisation of the system for registering with doctors - by creating a single, central queue register - can realistically contribute to the implementation of the principle of social justice, counteracting health exclusion and increasing citizens› trust in public institutions. The proposed solution also aligns with the directions set by the e-health strategy and may represent a significant step towards the full digitisation of health services.

The initiative also has clear potential to improve the availability of services and the quality of healthcare system management. A uniform registration system will allow for ongoing monitoring of queues, identification of bottlenecks and better planning of human and financial resources - by both the NHF and the Ministry of Health. In the medium and long term, this may lead to a reduction in regional disparities in access to specialists. An additional value of the proposed solution is the potential savings for the public payer. So-called «missed appointments», i.e., appointments not cancelled by patients, generate real costs for the National Health Fund (NHF) and disrupt the operations of medical facilities.

From a legislative perspective, the implementation of the call will require amendments to key legal acts, primarily the Act of 27 August 2004 on healthcare services financed from public funds - in terms of the rules for managing waiting lists and the informational obligations of service providers. It will also be necessary to adjust the implementing regulations, including the regulations of the Minister of Health and acts regulating the interoperability of IT systems in healthcare (including the Act on the Information System in Healthcare). Creating and implementing the appropriate digital infrastructure can be a challenge; however, considering the level of digitisation of the healthcare system in recent years - including the implementation of the P1 system, e-prescriptions, e-referrals and the Individual Patient Account - both the administration and medical entities already possess significant technological and organisational resources that can be utilised within this project.

77https://sprawdzamy.com/pomysl/koniec-chaosu-w-rejestracji-do-lekarza---jedna-wygodna-kolejka-online-id-1549

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6.6.3 ABOLITION OF THE REQUIREMENT FOR PERIODIC EXAMINATIONS FOR PERSONS WITH PERMANENT DISABILITIES[78]

The necessity of repeatedly applying for disability status determination in the situation: 1) Persons with permanently impaired body efficiency, unable to work or only able to work in sheltered employment conditions and requiring, in order to perform social roles, constant care and assistance from others due to an inability to exist independently. 2) A person meeting the criteria of a significant degree of disability, burdened with an incurable disease, with no clinical possibility of health improvement.

WHAT IS SPRAWDZAMY CALLING FOR?

The call of the deregulation group concerns the removal of the requirement for cyclic renewal of disability certificates for individuals whose health condition does not forecast improvement (e.g., due to incurable chronic diseases or permanent physical disability loss). The team proposes the introduction of indefinite rulings to facilitate administrative procedures and the daily lives of people with disabilities.

WHY DOES IT MATTER?

Despite the fact that the regulations provide for the possibility of issuing a permanent disability rating, in practice it often happens that such decisions are issued only for a specified period of time, even if, according to medical knowledge, their health condition is not expected to improve. This is particularly important, for example, in the case of incurable genetic diseases or permanent and irreversible body damage.

In order to obtain benefits and allowances, persons with disabilities must periodically undergo the same process of determining their degree of disability and assessing their ability to work, which causes excessive bureaucratisation and difficulties in accessing social benefits.

Currently, there are no precise criteria that allow for a clear assessment of whether the situation of the person concerned should be classified as «hopeless». Furthermore, the system of awarding benefits to individuals with disabilities is varied and causes practical problems.

COMMENTS

Limiting the discretion of medical panels when making decisions in cases of permanent disabilities is an important step towards improving the situation of people with disabilities; however, it should be preceded by a general revision of the system for granting social benefits to such individuals. To properly implement such a solution, it would be necessary to examine the varied adjudicative processes within different bodies and institutions, in order to align these solutions as closely as possible. This is especially important for individuals who receive benefits awarded by various bodies, as it necessitates on their part the need to adapt to diverse procedures related to disability assessment.

The implementation of indefinite rulings (the first step of which was the pending amendment to the regulation on determining disability and the degree of disability) would require the involvement of experts in the field of medical sciences and the development of clear criteria for assessing situations in which the health condition of the person concerned is not expected to improve.

Such a solution, assuming proper preparation as mentioned above, should be unequivocally evaluated positively. For it would facilitate the process of applying for allowances and benefits by people with permanent disabilities.

In the course of reviewing the aforementioned solutions, it would also be necessary to consider the possibility of introducing changes to the system of awarding benefits, so that applying for various types of benefits does not require a determination of disability each time. This may lead to divergent opinions of adjudicating panels issued in the same factual situation.

78https://sprawdzamy.com/pomysl/zniesienie-obowiazku-badan-okresowych-dla-osob-z-trwala-niepelnosprawnoscia-id-1112

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6.6.4 ACCESS TO RESEARCH RESULTS IN THE mOBYWATEL APP[79]

Making auxiliary test results available to patients via the Individual Patient Account, which could be integrated with the mObywatel app. Standardisation of the nomenclature (creation of a glossary) for laboratory tests. Creation of a central document repository.

WHAT IS SPRAWDZAMY CALLING FOR?

The proposal assumes the expansion of the functionalities of the mObywatel application to include access to diagnostic test results (e.g., blood tests, X-rays, MRIs, ultrasounds) - regardless of whether they were conducted in a public or private facility. The goal is to provide patients with fast, remote and complete access to their medical documentation, without the need to log into separate facility systems or wait for physical printouts.

The solution would be nationwide, standardising access to health data and integrated with existing state systems, such as the Internet Patient Account (IKP) or Platform P1.

WHY DOES IT MATTER?

Currently, patients have very limited and inconsistent access to test results - often dependent on the IT system of a particular facility. Many laboratories and clinics provide access only through internal portals, some require personal collection of results and some do not offer patients permanent access to their diagnostic history at all. This situation is burdensome, especially for the elderly, people with disabilities and also for those who frequently change their treatment location.

The introduction of a feature in mObywatel would provide the patient with a single source of reliable medical data, enabling both access to their medical history and faster therapeutic decision-making - by the patient themselves or by a doctor. This would not only increase the comfort and safety of patients, but also the efficiency of the healthcare system.

COMMENTS

From a legal perspective, this demand is consistent with the current regulations regarding patient rights to access medical records (Article 23 of the Act on Patient Rights and the Patient Ombudsman) and with the provisions of the European Union›s General Data Protection Regulation (GDPR), which emphasize the importance of an individual›s control over their own data. Expanding the functionality of the mObywatel application is a natural continuation of the digitisation of healthcare and the implementation of the constitutional principle of health protection (Article 68 of the Constitution of the Republic of Poland), while simultaneously strengthening the patient›s right to information and transparency.

From a technical and legal-systematic point of view, the solution would require ensuring interoperability of the mObywatel application with Platform P1, health protection units (public and private) and diagnostic laboratories. It will be crucial to specify the legal framework for accessing medical data through a mobile application - including defining standards for information security, authorisation and user identification. The Act on the Information System in Healthcare (consolidated text: Official Gazette of 2023, item 572) may serve as a basis for the technical expansion of integration.

The call also corresponds to the assumptions of the European Health Data Space (EHDS), which aims to provide citizens of EU countries with full and portable access to health data. Therefore, the implementation of the call can not only modernise the Polish healthcare system but also make it compliant with future EU frameworks.

We recommend that in further legislative work, the scope of data accessible through the application be clarified, including the creation of a hierarchy of types of examinations (e.g. imaging results, biochemical) and specifying the timelines for their transfer to the system. It will also be crucial to provide mechanisms for high-level authentication logging and options for granting access to other individuals (e.g., family members) based on consent.

79https://sprawdzamy.com/pomysl/dostep-do-wynikow-badan-w-aplikacji-mobywatel-id-1244

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6.6.5 SOR OVERWHELMED? CHECK IT IN THE APP BEFORE YOU SET OFF.[80]

Access to current queues in Hospital Emergency Departments (SOR) in mojeIKP or in mObywatel (by adding access to mojeIKP in the mObywatel app).

WHAT IS SPRAWDZAMY CALLING FOR?

The proposal concerns the introduction of a functionality that enables checking the current load of Hospital Emergency Departments (SOR) in the mObywatel application. The data would include, in particular, the number of patients waiting for admission, the estimated waiting time and the degree of prioritisation of reports. The aim is to enable patients to make more informed choices about facilities, which in consequence may lead to a more even distribution of patient traffic among different emergency departments and reduce overcrowding.

WHY DOES IT MATTER?

Emergency Departments in Poland have been struggling for years with the problem of overload - often resulting from the fact that patients turn up with non-life-threatening cases, without knowing the state of the queues. The lack of transparent data on the current occupancy of Emergency Departments causes many patients to go to the nearest, but already overcrowded facility, while others - potentially less burdened - remain less congested with patient traffic.

The call responds to a real information need and can have a positive impact on the entire emergency care system, especially in large urban agglomerations. Importantly, the solution does not require new diagnostic infrastructure, but instead relies on better utilisation of the data already generated by hospitals.

COMMENTS

From a legal and institutional perspective, this call aligns with the principle of transparency in the functioning of public administration (Article 61 of the Constitution of the Republic of Poland) and the constitutional right of the citizen to health protection (Article 68(1)). Real-time sharing of information about the occupancy status of Emergency Departments can significantly increase the efficiency of the healthcare system, while maintaining the safety and autonomy of the patient in decision-making.

However, this solution would require the creation of coherent and standardised legal and IT frameworks for the collection and sharing of data. From a legislative perspective, the possible paths include amending the Act on the Healthcare Information System and the regulations of the Minister of Health regarding reporting and the operation of the Emergency Department. It will be crucial to indicate which data can be made publicly available, how often they should be updated and who is responsible for their quality and reliability.

Sharing data must not violate personal data protection regulations - the data must be purely statistical and must not enable the identification of patients. Proper anonymisation and access control (e.g., through authentication in the mObywatel app) are necessary to comply with Article 5 and 32 of the GDPR and the personal data protection act.

The system can also contribute to better management of patient traffic on a macro scale, for example, through integration with provincial crisis management centres or dispatcher platforms. Aggregated data could also serve as an analytical tool for decision-makers in managing hospital networks and allocating resources.

The call should be assessed very positively - it is an example of a simple yet systematically valuable solution that can relieve emergency departments, reduce waiting times for help and improve the organisation of work in hospitals. We recommend its further processing, along with the concurrent development of regulatory and technical frameworks in collaboration with the e-Health Centre and the National Health Fund (NHF).

80https://sprawdzamy.com/pomysl/sor-przepelniony-sprawdz-to-w-aplikacji-zanim-wyruszysz-id-1748

6.7 Energy and environment

GWW LEGAL & TAX

6.7.1 RAISING THE POWER LIMIT OF PV INSTALLATIONS FOR OWN USE TO 500 KW[81]

Simplifying the procedures for constructing photovoltaic installations for own use by increasing the power limit of installations exempt from the requirement to obtain a building permit from 150 kW to 500 kW.

WHAT IS SPRAWDZAMY CALLING FOR?

The call to increase the power limit of photovoltaic installations that can be implemented based on a notification, from the current 150 kW to 500 kW, concerns simplifying the investment process for companies and farms wishing to produce electricity for their own needs. Current regulations allow for the construction of PV installations up to 150 kW without a building permit, provided that the installation does not exceed 3 metres in height and is not located in a conservation area. Exceeding the 150 kW threshold means that it is necessary to obtain a building permit, which involves a series of design requirements, costs and extended implementation time. The aim of the proposal is to expand the possibilities for constructing larger installations - up to 500 kW - also on the basis of a notification, without the need for a full administrative procedure.

WHY DOES IT MATTER?

The obligation to obtain a building permit for PV installations above 150 kW generates significant costs and extends the time of investment implementation. According to industry information, obtaining a building permit takes from 3 to 6 months. Investors must bear the costs of developing a construction project, consultations with experts and formal documentation, which often involves the need to hire external engineering and legal firms. The construction project itself can cost from several to several tens of thousands of złotys and the total costs associated with the formal handling of the entire process can exceed several tens of thousands of złotys. This requirement discourages many entrepreneurs from investing in larger PV installations and leads to the division of projects into smaller, artificially limited units with a capacity of up to 150 kW, which is economically and technically irrational.

COMMENTS

Contemporary photovoltaic installations with a capacity of 500 kW do not differ significantly in size from 150 kW installations built a few years ago. Thanks to technological progress, modern PV modules are more efficient, allowing for higher power output from the same surface area. This means that a 500 kW installation may occupy only slightly more space than a 150 kW installation and its impact on the environment - landscape, noise, safety - is comparable. There is therefore no technical justification for the rigorous treatment of such projects. That is precisely why many European countries have higher thresholds for investments carried out without permission. In Germany, this limit is 500 kW and in Italy even 1 MW - where they are also implemented based on a notification or a simplified administrative procedure. Poland is among the countries with the lowest limits, which puts domestic investors in a less competitive position.

Increasing the limit to 500 kW would enable the implementation of larger PV projects in a fast and transparent manner, without the need to allocate additional resources for formal procedures. Installations of this size work perfectly in manufacturing plants, logistics centres, agricultural and food processing facilities, grain dryers, cold stores and other facilities with a high energy demand. The energy produced can be entirely consumed on-site, which does not burden the power grid and at the same time strengthens local energy self-sufficiency.

In the context of energy transformation and the European Union›s climate policy, reducing administrative barriers for investments in renewable energy sources is one of the key directions of action. Procedural facilitations for projects implemented for own needs allow for the development of distributed energy, increase system flexibility and reduce the demand for centrally generated fossil fuel energy. Introducing the proposed change would be a simple and effective way to unlock the investment potential of small and medium-sized entities without burdening the state budget and without increasing the risk to network security. This change should be implemented as soon as possible as part of the rationalisation of regulations and support for the energy transition.

81https://sprawdzamy.com/pomysl/podniesienie-limitu-mocy-instalacji-pv-na-potrzeby-wlasne-do-500-kw-id-1221

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6.7.2 LIMITATION OF THE LICENSING REQUIREMENT FOR RENEWABLE ENERGY SOURCES - INCREASING THE THRESHOLD TO 50 MW[82]

Regulation of economic activity - licensing. Raising the minimum threshold for renewable energy installations, from which it is necessary to obtain a licence to generate electricity.Entrepreneurs who do not exceed this threshold will be required to obtain an entry in the register maintained by the President of the Energy Regulatory Office, which is currently held for renewable energy installations with an installed electrical capacity of up to 1 MW.

WHAT IS SPRAWDZAMY CALLING FOR?

The call concerns the abolition of the requirement to obtain a concession for the generation of electricity from renewable energy sources (RES) for installations with an installed electrical capacity of up to 50 MW. Currently, according to the regulations of the Energy Law, the concession obligation covers all renewable energy installations exceeding 1 MW of power. At the same time, for other types of energy installations (non-RES), this threshold is 50 MW. The call thus aims to standardise and simplify regulations, as well as to remove unnecessary administrative barriers for investors in the renewable energy sector.

According to the proposal, renewable energy installations up to 50 MW would not need to obtain a license, but would only need to register in the register maintained by the President of the Energy Regulatory Office (URE) - similarly to the current situation with so-called small renewable energy installations of up to 1 MW. Facilities that already have a concession would be automatically transferred to the new register and ongoing concession proceedings would be concluded as registration proceedings. The proposal also assumes the adjustment of transitional provisions to ensure that the entire process is smooth and without unnecessary burdens for investors and administration.

WHY DOES IT MATTER?

The proposal is deregulatory in nature and responds to specific administrative barriers reported by the renewable energy sector. Current concession procedures often last many months, which delays the launching of facilities, even if their construction and connection to the network have already been completed. This means a loss of time, money and missed opportunities for energy production. The abolition of the concession requirement for installations up to 50 MW would significantly simplify the market entry process - especially for medium-scale photovoltaic projects, biogas plants, hydroelectric power stations, or wind farms.

COMMENTS

Implementing the call would have a positive impact on the pace of renewable energy development in Poland and would contribute to achieving climate goals without incurring costs for the state budget. Shortening administrative procedures would increase investment efficiency and allow the avoidance of multi-month standstills. Importantly, according to the regulatory impact analysis, no negative social or systemic effects are anticipated - on the contrary, reducing the administrative burden on the Energy Regulatory Office may lead to a reduction in public costs due to the lack of necessity to expand employment in the office.

In a comparative context, Poland - by maintaining the concession threshold for renewable energy sources at 1 MW - is much more stringent than many European countries. Raising this threshold to 50 MW would therefore be a step towards harmonising with the practices of other EU countries, where regulations support the development of green energy by simplifying formal procedures for medium-scale investments.

It is worth emphasizing that the proposed change does not mean a complete lack of control over such installations - these entities would still be subject to the obligation to register in the URE system and would also remain supervised in terms of network safety, compliance with the system development plan and reporting obligations. As a result, URE could focus its human resources on controlling the largest, strategic market entities.

The proposed change is rational, feasible and necessary, especially during the accelerating energy transformation and increasing demand for local, stable energy sources.

82https://sprawdzamy.com/pomysl/zrownanie-wymogow-koncesjonowania-oze-z-instalacjami-tradycyjnymi-id-1336

GWW LEGAL & TAX

6.7.3 EASIER INTEGRATION OF VARIOUS ENERGY SOURCES IN A SINGLE CONNECTION (CABLE-POOLING)[83]

The initiative involves removing obstacles for broader use of regulations concerning so-called cable-pooling.

WHAT IS SPRAWDZAMY CALLING FOR?

The call concerns the elimination of barriers that limit the possibility of wider use of so-called cable-pooling, which involves connecting several production installations to the power grid at a single common connection point. The proposal aims to simplify procedures, eliminate discriminatory restrictions and expand the application of cable-pooling to also include energy storage facilities and installations not classified as renewable energy sources.

In accordance with the proposal:

- in the case of adding a new installation (renewable energy sources, storage or another source) to an existing connection - as long as the connection capacity is not increased - it would not be required to prepare a new impact assessment on the network,
- the time to consider the application would be halved,
- the deposit for connection costs would only amount to 10% of the standard sum,
- each installation could benefit from a support system (auction-based, FiT, FiP),
- it would be possible to connect energy storage facilities as separate units and
- the combination of renewable energy sources with non-renewable installations at a single point would be allowed.

WHY DOES IT MATTER?

Currently, although the provisions of energy law and the Act on Renewable Energy Sources formally allow cable-pooling, in practice its implementation faces numerous barriers. The most important include: the obligation to conduct a full impact assessment on the network (as with a new connection), the lengthy time for considering applications (120-150 days), the necessity to pay a full connection deposit and the lack of possibility to include more than one renewable energy installation within a common connection under the support system. Additionally, current regulations do not provide for the possibility of connecting independent energy storage units (so-called stand-alone) to an existing connection. The changes proposed in the motion aim to remove these barriers.

COMMENTS

The regulatory and systemic justification is very strong. Cable-pooling allows for maximum utilisation of the existing connection infrastructure under conditions of a serious deficit of connection capacities in the National Power System. In 2023, over 7.500 refusals were issued for the connection of production installations with a total capacity of 84 GW. Meanwhile, many connections are only partially used - for example, by PV installations that mainly operate during the day. Connecting wind installations or storage facilities at the same points could improve the generation profile and increase system reliability without the need to expand the network.

The introduction of the proposed solutions would allow investors greater design flexibility and faster project implementation, while simultaneously ensuring control over exceeding the connection capacity (by using so-called power guardians). It would also enable the development of local hybrid models: for example, PV farms integrated with energy storage and biogas or wind installations.

From the perspective of comparative law, cable-pooling solutions are already being implemented in many EU countries (including Germany, Denmark, France, Spain and Italy) and are promoted as a tool for increasing energy efficiency and accelerating the energy transition. The proposal also aligns with the actions recommended by the European agency ACER and amendments adopted, for example, in Ukraine in 2025.

In summary, the change is rational, technically feasible and in line with EU trends. It can significantly increase the supply of green energy in Poland without additional network investments, improve investment conditions and contribute to the development of a flexible energy mix based on renewable sources and energy storage.

83https://sprawdzamy.com/pomysl/latwiejsze-laczenie-roznych-zrodel-energii-w-jednym-przylaczu-cable-pooling-id-1503

GWW
LEGAL & TAX

6.7.4 LET'S UNLEASH CONNECTION POWERS - END THE BLOCKING BY «DEAD» AGREEMENTS[84]

Blocking of connection capacities: lack of available connection capacities in the National Power System while multiple unimplemented connection agreements are in operation.

WHAT IS SPRAWDZAMY CALLING FOR?

The call assumes the necessity to solve the problem of «dead» connection agreements, which reserve capacities in the National Power System (NPS), despite not being implemented. The proposed changes include, in particular: the introduction of maximum deadlines for connection completion (48 months for renewable energy sources, 120 for offshore wind farms), the obligation to verify so-called milestones (e.g., administrative decisions, investment purchases) and one, maximum annual extension of the deadline. In the event of their non-compliance, the operator will be obliged to terminate the contract.

WHY DOES IT MATTER?

For many years, entrepreneurs have been entering into connection agreements, but they have not taken any steps towards their actual implementation - they did not apply for environmental decisions, building permits, or purchase components. The applicable law does not impose on operators the duty to monitor progress or terminate such contracts, which leads to the long-term «freezing» of capacities that could be utilised by active investors.

The scale of the problem is not theoretical. According to data from the Energy Regulatory Office, in 2024 alone, 7.838 refusals to issue conditions for connection to the distribution and transmission network were issued. Although the number of refusals increased by 5% compared to 2023, the total capacity of the projects concerned decreased by 12% to 73.6 GW. Renewable energy sources accounted for nearly 6.3 thousand refusals, with a total requested capacity of 42.4 GW. The most common reason for refusal was the lack of technical connection conditions (over 4.4 thousand cases, 33.5 GW), followed by economic factors and their combination.

Operators admit that in many cases, applications are submitted for locations without a real demand for energy (e.g., rural areas without industry) or in areas where the network infrastructure is insufficient. PGE Distribution has noted that in its area, 10.3 GW of capacity is connected, with peak demand amounting to only 6.6 GW. Energa-Operator indicated that some sources are located too deep within the MV network, which prevents connection without costly modernisations. Tauron, in turn, pointed out the blocking of capacity by entities that, despite the issued conditions, do not enter into contracts.

COMMENTS

Blocking connection capacities results in delays in the implementation of ready-to-launch renewable energy investments, limits competition, raises energy costs and reduces the chances of achieving climate goals. There are no mechanisms to verify the actual progress of connection projects, which leads to pathologies - strategic reservation of capacities or mere passivity of investors who do not take further actions after obtaining the agreement. The introduction of the proposed regulation will improve transparency and fairness in network access and will enable more efficient use of existing infrastructure without the need for huge expenditures on new network investments. However, it will be crucial to clearly define the milestones and appropriate transitional provisions that, on one hand, will release blocked capacities and on the other - protect the interests of honest investors who are in the process of implementing their projects. It›s not just a matter of an efficient market, but also a condition for the rapid energy transformation of the country.

84https://sprawdzamy.com/pomysl/uwolnijmy-moce-przylaczeniowe---koniec-z-blokowaniem-przez-martwe-umowy-id-1639

7. Co-authors of the Report and Project Partners



Franek Hutten-Czapski

Managing Director and Senior Partner of BCG Poland

With pride and full conviction, we participated in the work of the expert team, which as part of its pro bono activities developed a deregulation programme of critical importance for the development of the Polish economy. From over 16,000 ideas proposed by citizens, after eliminating duplicates, nearly 13,000 unique deregulation ideas remained. So the response was really impressive!

We sincerely thank Rafał Brzoska for inviting us to participate in this important initiative. We believe that the prepared solutions represent a real chance to improve the conditions for conducting business activities in Poland, particularly to the benefit of Polish entrepreneurs and citizens.



Jakub Zwierz

BCG Poland Partner

Deregulation programmes are gaining importance and are being successfully implemented in many countries around the world - apart from the United States, increasingly also in Europe, including currently in Poland. As Boston Consulting Group, we have the honour not only to advise individual clients but also to actively support systemic initiatives that contribute to improving the conditions for conducting business in various sectors.

BCG

Boston Consulting Group collaborates with leaders in business and society to meet their greatest challenges and seize their opportunities. Founded in 1963, the company BCG was a pioneer in the field of business strategy. Today, I closely collaborate with clients to adopt a transformational approach aimed at benefiting all stakeholders - enabling organisations to grow, build lasting competitive advantage and exert a positive social impact.



Dr Anna Hlebicka-Józefowicz

Partner, Head of Regulatory Advisory, Legislation and Compliance Practice at DZP Law Firm

The deregulatory initiative SprawdzaMY is a great opportunity to discuss the quality of Polish legislation and the law-making process, including the implementation of EU law. As a team that advises entrepreneurs on a daily basis in the legislative process, we follow the progress of the work and the ideas submitted with interest. I am pleased that DZP experts had the opportunity to comment on selected proposals submitted as part of the SprawdzaMY initiative, to share their knowledge from their areas and forecasts regarding the possible impact of the proposed changes.

DZP
więcej niż prawo

Domański Zakrzewski Palinka is one of the largest independent Polish law firms, supporting its clients for 30 years. It is made up of a team of 180 experts advising in 40 specialisations. DZP advisors are regularly awarded and recommended in national, as well as international, opinion-forming industry rankings.

The clients of the law firm include both Polish and foreign companies representing almost all sectors of the economy. Over the 30 years of its activity, DZP has built an extensive network of connections and relationships with foreign law firms and consulting companies operating in over 90 countries. The firm has offices in Warsaw, Wrocław and Poznań.



Ryszard Chmura

President of the Entrepreneurship Support Foundation

Entrepreneurs are not just taxpayers - they are architects of economic development, creators of jobs and innovations, who take on risk every day to build a better future. That›s why our Foundation engages in the SprawdzaMY project - because by simplifying the law and removing barriers, we give entrepreneurs more time and energy for what they do best: creating value for society and the economy.

This is already the third time that the Entrepreneurship Support Foundation has united the largest business organisations and hundreds of entrepreneurs around a common goal. First, there was aid for Ukraine - over 100 million USD in support, then the Entrepreneurs for Flood Victims campaign - 123 million PLN in aid. Now SprawdzaMY - because we can mobilise the business community not only in a crisis, but also for systemic changes for the better.

FUNDACJA
Wsparcia Przedsiębiorczości

The Entrepreneurship Support Foundation was established by The Company - the largest platform for entrepreneurs in Poland - incorporating in BNI and Corporate Connections organisations nearly 2500 companies ranging from small through medium to the largest. The vision of the Foundation is the belief that entrepreneurship is the driving force of every economy and is the foundation of social welfare. The implementation of this vision requires the joint effort of entrepreneurs, business organisations, state institutions and the entire society.



Wanda Buk

Lawyer, Partner at GWW Legal & Tax

GWW Legal & Tax has decided to support the SprawdzaMY project because it is not only a deregulatory initiative but, above all, a social platform for the real improvement of state operations. The project led by Rafał Brzoska engages hundreds of experts and volunteers, gathering thousands of specific proposals to simplify the law - for example, the digitisation of employment contracts, tax relief, or simplifying investment processes in renewable energy. As a firm that has been active in regulatory areas for years, we continuously support efforts towards a more transparent, friendly and modern legal environment. This is an initiative that genuinely supports entrepreneurs and citizens - and that is particularly important to us.

GWW Legal & Tax is an independent Polish firm with nearly 30 years of experience in fostering entrepreneurship in Poland. It adopts a comprehensive approach to the legal and tax services it offers, which are provided by a team of over 180 specialists. It provides its clients with legal and tax advice, based not only on legal knowledge but also on a proper understanding of the business context. It has offices in Warsaw, Poznań, Wrocław and Rzeszów.



Marcin Duma

President of the IBRiS Board

At IBRiS, we believe that reliable data and the voice of public opinion are the foundation of a healthy democracy and effective reforms. Therefore, we decided to support the SprawdzaMY project, which perfectly aligns with our mission to provide transparent and credible analyses. In the face of such significant legal and economic changes in Poland, it is crucial that the process of their implementation is not only effective but also understandable and socially acceptable and the voice of public opinion is invaluable at these moments. SprawdzaMY enables reliable verification of the social reception of these changes and we, thanks to our research tools, can provide significant data in this process, which will contribute to building a more open and responsible state.

The Market and Social Research Institute Foundation (IBRiS) is a leader in the field of professional public opinion research in Poland and the strongest brand among research agencies. Our innovative research methods and reliable market analyses have been repeatedly awarded by experts in the industry, as well as by clients. As a foundation, we work to improve the quality of research, promote the profession of researcher and disseminate knowledge about the state and trends of public opinion changes in Poland and around the world within society. As a dynamically operating research agency, we conduct marketing, social and political research on behalf of private and public entities both domestically and abroad.



Tomasz Kassel

Managing Partner of the Legal and Tax Department at PwC Poland

Engaging in the SprawdzaMY initiative was a natural step for our organisation. Our tax and legal teams routinely face the complexities of Polish law directly and often their tasks involve solving problems facilitated by, unfortunately, unclear regulations. Simplifying regulations is something that benefits not only businesses but every citizen. It has been a long time since there was such an important and needed initiative in Poland.



Michał Mastalerz

Managing Partner, President of the Management Board of PwC Poland

Part of building trust in business is supporting initiatives important to the entire society. I include in this SprawdzaMY - a project that goes beyond business boundaries and touches the lives of every citizen. Working in one team with such committed entrepreneurs is a good sign for our competitiveness. We need a strong voice of Polish entrepreneurship. Clear and simple regulations favour economic growth.

At PwC, we help clients build trust and undergo transformations that turn challenges into competitive advantages. We are a modern, technological organisation based on the knowledge and experience of more than 370,000 people in 149 countries. We operate in the areas of audit and attestation services, tax and legal consulting, transactional and business advisory - we support development, accelerate changes and help maintain their pace. In Poland, PwC has offices in 7 cities as well as a Financial Crime Unit in Gdańsk, Warsaw and Lublin, two Shared Service Centres in Katowice and Opole and a PwC IT Services branch in Lublin. Polish PwC companies employ over 7,000 people, including almost 2,000 in technology teams.



Dr Robert Draba

Legal advisor, Manager, Partner at Oldman Sage Draba, Ginel and Partners Limited Partnership.

This is a time that has shown that the law does not have to be merely a tool of control - it can support freedom, build trust and create a sense of security, stability and space for action.

The deregulation we worked on went beyond the legislative framework. It became an impulse for mobilisation - citizens and entrepreneurs felt that their voice mattered. They reported barriers, pointed out absurdities and proposed specific, practical solutions.

At the centre of the process stood a person with their initiative, experience, needs and readiness for change. This is proof that the state can be closer to the citizen - as a partner, not just as an office or system.

We have shown that it can be done differently: more simply, more wisely, more effectively, with greater respect for citizens› time and competence. And that even a single call can initiate a process that leads to something bigger - the rebuilding of trust between citizens and institutions.



Marcin Ginel

Lawyer, Manager, Managing Partner at Oldman Sage Draba, Ginel and Partners Limited Partnership.

Participating in the deregulation project was for me not only an expression of professional commitment, but above all a responsible response to the real needs of entrepreneurs, citizens and public institutions. Deregulation for me is not a technocratic slogan, but a profound process of modernising the state, based on dialogue, efficiency and an understanding of economic mechanisms.

During the work on legal simplifications, I focused on ensuring that each proposed change had a specific, measurable effect. My goal was to create regulations that not only meet legislative standards but, above all, serve to genuinely improve economic life and the daily functioning of citizens.

Deregulation is therefore not just a technical action - it is a decision about the direction of the state›s development. This is advocating for a model of a state that supports, rather than restricts.

OLDMAN SAGE

Oldman Sage Draba, Ginel and Partners Law Firm Sp. K. was founded by Robert Draba and Marcin Ginel - experienced lawyers and managers who, in the past, held top positions in the Polish government administration and managed companies, including those listed on the Warsaw Stock Exchange. Thanks to a unique combination of legal knowledge and business practice, the law firm offers clients comprehensive and effective support in the most demanding cases. The law firm›s team consists of experts who understand both the realities of public sector operations and the challenges faced by large economic entities. The foundation of the law firm›s activity is the maxim of effectiveness in action.

8. Final Remarks from the SprawdzaMY Team



Our work on proposals for legal changes has led to the presentation of **over 450 deregulatory and pro-social proposals**, most of which have been accepted for proceedings by the government side. Each proposal was diagnosed and developed by experts, verified by an internal team and subjected to public assessment. At every stage of the project, a group of people was involved, whose experience and knowledge allowed to **unleash deregulatory energy** and, from among thousands of submitted proposals, identify those most important for entrepreneurs and citizens. It is a huge asset that can result in a **continuous dialogue between the social and governmental sides**.

The legal team worked intensively for over **100 days**, striving to refine each proposal and then defending them at meetings with the Government Deregulation Team. In this group, the ministries were represented by experts who conducted a comprehensive analysis of the prepared initiatives. Repeatedly, each party pointed out aspects that arose from their **practice and experience, aiming to** identify the real problem of entrepreneurs and trying to select the appropriate tool to address it. In the course of such a discussion, optimal solutions were developed, the most effective from a legal, social and economic standpoint.

However, this is not the end of the work - the accepted initiatives must take on a legislative dimension, meaning they need to be incorporated into the legal system. The further work of the legal team will focus on **monitoring the way in which the demands are implemented** and responding in a legally permitted manner if they are implemented inconsistently with their essence or incompletely. Nevertheless, it should be acknowledged that any change moving in the right direction is a great success of the SprawdzaMY initiative, showing that **the voice of entrepreneurs and citizens has been heard**.

It is also worth noting that this entire process is absolutely pioneering and was developed on the fly. Thanks to the commitment of all the individuals in the Team SprawdzaMY, solutions were created on a live organism that initially led to the delivery of several dozen proposals weekly to the government side and then to identifying and responding to the projects prepared by the government side for the implementation of demands. **Flexibility in responding to changes**, a high work culture and commitment have allowed the process of submitting proposals to be successfully concluded and to focus on monitoring their implementation.

It was a wonderful adventure for all of us, which laid the foundation for ongoing cooperation between entrepreneurs and citizens with the government side. We believe that the developed schemes, expert opinions obtained and accumulated knowledge will allow for the implementation of further deregulatory demands in the future, with an even greater impact on the activities of entrepreneurs and the life of every citizen.

This is just the beginning - soon, the second phase of the SprawdzaMY initiative will start, taking deregulation efforts to an even higher level. We are planning an in-depth analysis of the most complex legal and systemic issues, as well as a comprehensive approach to selected areas requiring greater intervention. We will also develop the SprawdzaMY.com website, which will become not only a channel for submitting proposals, but also a tool for tracking, consulting and monitoring their implementation. At the same time, we will change the way we operate - from a dynamic start-up model, we will shift to a more stable, structured and systematic work model, while still maintaining the flexibility and agility that have been the driving force behind our actions so far. We hope that the subsequent stages will allow us to effectively develop the process that has been started and respond to the new needs of entrepreneurs and citizens.

SprawdzaMY Team

9. SprawdzaMY Team and Supporting Experts

Team SprawdzaMY

ENTREPRENEURS' REPRESENTATIVE FOR DEREGULATION

Rafał Brzoska

PROJECT COORDINATORS

Adam Malinowski, Jacek Socha

STEERING COMMITTEE

Dr n. med. Małgorzata Adamkiewicz, Ryszard Chmura, Rafał Dutkiewicz, Wojciech Kostrzewa, Maciej Witucki

ADVISORY TEAM TO THE STEERING COMMITTEE

Michał Białek, Jacek Cieplak, Dr. Robert Draba, Marcin Ginel, Dr. Eliza Misiecka, Dr. Olga Zabolewicz, Prof. Robert Zawłocki Andrzej Ladziński

PROJECT'S EXECUTIVE TEAM

Prof. Paweł Wajda, Rafał Wojciechowski, Marcin Zawadzki, Bartłomiej Kamiński

PROJECT MANAGEMENT OFFICE

Zuzanna Dziekońska, Magdalena Kozyra, Krzysztof Michalski, Jakub Młodzikowski, Katarzyna Nowakowska, Norbert Ostrowski, Anna Skopicz-Radkiewicz, Przemysław Walter

ENTREPRENEURSHIP SUPPORT FOUNDATION TEAM

Kamil Kardaś, Iwo Kolasiński, Agata Okońska, Maciej Owczarek, Maja Pruk, Ewa Rzodkiewicz, Wojciech Szałański, Barbara Skowrońska

EXTERNAL SUPPORT

Bartosz Adamski, Wiktor Babiński, Jan Berbec, Jan Bartkowiak, Szymon Bogucki, Marta Czarkowska, Paweł Ellerik, Katarzyna Ellerik, Łukasz Gajos, Marcin Gąsiorek, Karolina Gnyś, Bartosz Jóźwiak, Aleksandra Kuliczkowska, Maria Kurkus, Piotr Lazarek, Jolanta Michalik, Mateusz Mielczarek, Konrad Ogorzelski, Przemysław Pastusiak, Michał Wyrębkowski

Experts supporting the SprawdzaMY Initiative

EXPERT TEAM LEADERS

Wanda Buk, Marcin Czugan, Anna Dobroskok, Jakub Dąbroś, dr Ewa Ger, Artur Gregorczyk, Jakub Jasnos, Piotr Karlik,Andrzej Ladziński, Aleksandra Libiszowska, Rafał Macias, Łukasz Medaj, Konrad Młynkiewicz, Dobrochna Lama, Jerzy Olszewski, Karolina Opilewicz, Aleksandra Ossowska, Piotr Osiecki, Piotr Palutkiewicz, Marek Pasztetnik, Andrzej Płachta, Tomasz Pyrda, Jarosław Pytlak, Kacper Raciborski, Przemysław Ruchlicki, Paweł Sawicki, Tomasz Surma, Przemysław Stodolak, Anna Streżyńska, Emilia Szyszkowska, Andrzej Strojny, Marta Ślubowska, Katarzyna Urbańska, Kamil Waligóra, Przemysław Walter, Anna Wilińska-Zelek, Tomasz Zieliński, Krzysztof Zamasz, August Żywczyk

MEMBERS OF THE EXPERT COUNCIL

Agnieszka Maria Majewska, Anna Streżyńska, Dorota Korycińska, Associate Professor in Law Przemysław Litwiniuk, Associate Professor of LawRobert Gwiazdowski, PhD, Hab. Piotr Sankowski, Dr. Maciej Kawecki, Jacek Siwiec, the Mayor of Chełm, Jakub Banaszek, the Mayor of Ciechanów, Krzysztof Kosiński, the Mayor of Głogów, Rafael Rokaszewicz, Dr. Hab. Prof.Tadeusz Truskolaski, Tomasz Pęcherz, Tomasz Zieliński

TRADE UNION SIDE COMMENTING ON PROPOSALS

10. Partner and supporting organisations

PARTNER ORGANISATIONS

BNI Poland, a leading business networking organisation in Poland and worldwide, has been present in the country since 2006 and brings together nearly 2,000 entrepreneurs from the SME sector in more than 80 local groups across 21 cities. It operates based on a proven collaboration model and the Givers Gain philosophy - where partners mutually recommend each other›s services, translating into tangible business benefits.

Maciej Tymusz

Board Member of The Company (BNI Poland, Corporate Connections)

As BNI Poland, we support the deregulation project SprawdzaMY because we know how complex regulations can hinder the daily operations of companies. Deregulation is a complex topic - full of technical nuances and legislative paths - which is why it is so important to talk about it in a straightforward, specific and energetic way. For only better, clearer laws create fewer barriers and more space for development.

Corporate Connections is an international business organisation, present in 31 countries, that brings together owners of large companies. In Poland, it brings together over 250 of the largest entrepreneurs, with revenues exceeding 100 million PLN annually. Its aim is to support strategic business relationships at the ownership level and to create a safe forum for the exchange of knowledge, experiences and investment opportunities. Members of the organisation regularly participate in closed meetings, workshops and events featuring business leaders and experts from various industries.

Rafał Płuciennik

Corporate Connections Partner

We believe that entrepreneurs - especially those from the SME sector - deserve simple, understandable laws that allow them to operate, rather than battle with bureaucracy. We needed a specific impulse to gather good ideas and turn them into tangible proposals for change. For us, SprawdzaMY is about more than just changing a few regulations - it›s a real opportunity for a lasting improvement in the legal environment for thousands of Polish companies.

KONFEDERACJA LEWIATAN

The Lewiatan Confederation is a leading business organisation that comprises nearly 4,100 companies employing over a million workers. Thanks to its actions, it influences the shape of economic law, conducts dialogue with the administration and represents member companies in Poland and the European Union. It has a permanent representation in Brussels and is the only organisation from Poland that belongs to BusinessEurope - the largest European business organisation. It is also a member of the international organisation Business at OECD.

Maciej Witucki

President of the Lewiatan Confederation

The Lewiatan Confederation, as a representative organisation of employers, has been working for years to simplify regulations and reduce bureaucracy in order to facilitate doing business in Poland. We regularly present proposals for changes aimed at reducing the number of complex regulations, including through the periodically published Black List of Barriers.

We support all activities that lead to the elimination of unnecessary formalities and costs, as this positively affects the development of companies and the entire economy.

From our perspective, the SprawdzaMY initiative is an important opportunity to organise and simplify the regulations that complicate the business reality. We perceive it as an original, especially by Polish standards, combination of institutional dialogue with personal commitment and the energy of the Prime Minister on one hand and Rafał Brzoska on the other. Such an approach offered a chance for significant progress - and indeed, that is what happened.

Polska Rada Biznesu

The Polish Business Council is an organisation that has existed since 1992, bringing together owners and key managers of the largest Polish enterprises and international companies operating in Poland. Members of the PBC represent the majority of economic sectors. The organisation works for the development of entrepreneurship in Poland and also supports social and civic initiatives.

Wojciech Kostrzewa

President of the Polish Business Council

The Polish Business Council has joined the SprawdzaMY initiative because we believe that Poland needs deep and wise deregulation. Over the years, regulations have accumulated which, instead of helping, often stifled entrepreneurship and innovation. SprawdzaMY is a grassroots project based on the real experiences of citizens and companies - which is why it has the potential to bring about changes that are genuinely needed and feasible to implement. As representatives of the business community, we feel responsible for supporting solutions that increase the transparency of law, reduce bureaucracy, simplify the living conditions of entrepreneurs and restore citizens› trust in state institutions. This initiative combines the professionalism of experts with civic energy - and that is exactly why we decided to get involved in it.

PRACODAWCY RP

Employers of Poland, the largest and oldest employer organisation in Poland, associating around 12,000 companies employing over 5 million people. Since 1989, it has represented business in social dialogue and the legislative process, aiming to create regulations that are friendly to entrepreneurs. Thanks to the specialised Legislation Monitoring Centre, the organisation actively reviews draft laws, conducts consultations and co-creates expert positions. It supports the development of entrepreneurship through advisory, educational and advocacy activities - also within the Council of Polish Entrepreneurs, which brings together leaders of the largest private companies in the country.

Rafał Dutkiewicz

President of the Board of Polish Employers

Employers of Poland have actively engaged in the SprawdzaMY initiative because they see the deregulation of legal regulations as a key element for the development of the Polish economy and improving the conditions for conducting business activities. Our members have long emphasised the need to simplify the law, the tax system and administration to create a more friendly environment for investment and entrepreneurship. Frequent changes to regulations and their ambiguity generate uncertainty and risk for businesses. Employers of Poland strive to ensure that the law is clear, stable and predictable, which is fundamental for making long-term investment decisions, which will translate into increased economic dynamics. Fewer barriers mean greater freedom in conducting business, which in turn promotes the creation of new jobs and increases government revenue.

Krajowa Izba Doradców Podatkowych

The National Chamber of Tax Advisors is a nationwide professional self-government of tax advisors. Its membership comprises over 9,000 tax advisors. Tax advisors perform a public trust profession by supporting taxpayers, payers and other entities in fulfilling their obligations imposed by tax laws. Tax advisors particularly provide advice, opinions and explanations regarding tax obligations, prepare tax returns and declarations and represent clients in proceedings before tax authorities at all levels and before administrative courts.

dor. pod. Andrzej Ladziński

Chairman of the National Council of Tax Advisors

No one knows the intricacies of the Polish tax system better than tax advisors - who apply tax regulations in practice and know all their good and bad sides. As a self-governing body of tax advisors, we have been advocating for years for the simplification of tax law regulations and a change in the tax authorities› attitude towards entrepreneurs - which is also one of the goals of the team led by Rafał Brzoska. Therefore, we are joining forces to collectively fight for better business conditions in Poland.

WKB Lawyers is a team of over 160 experts specialising in nearly 30 areas of commercial law. We offer comprehensive legal solutions that arise from the combination of knowledge, many years of experience and an understanding of the specificities of various economic sectors. For over 20 years, we have been supporting the largest Polish and international companies by implementing strategic projects for them. On our account, we have hundreds of successfully completed projects for leaders in various industries - from modern e-commerce and the demanding energy sector to the advanced financial industry.

Agnieszka Wiercińska-Krużewska

Managing Partner at WKB

For years, WKB Lawyers has been engaged in activities that genuinely impact the improvement of the legal environment in Poland. Supporting the SprawdzaMY project is on one hand a natural continuation of this mission and on the other hand an admiration for the project›s dynamism, professionalism and effectiveness. We believe that simplifying and streamlining regulations is key to better conditions for entrepreneurship and citizens› trust in the law and Poland›s position in the world.

Group One, the largest independent marketing and technology group in Poland, employs over 840 experts from all areas of modern marketing communication. Since its establishment in 2013, Group One has been designing and implementing positive business change for companies and brands, operating in over 60 markets worldwide. The company offers integrated strategic and media consulting, combining it with the broadest expertise in technology, MarTech, e-commerce, digital transformation, content and production, gaming and inclusive marketing. Within the House of Communication, there are 15 specialised agencies, including five media houses: Value Media, MediaPlus Warsaw, Mediaplus Prague, RL Media and Media Republic. The group also includes the creative agencies: Change, Serviceplan and Gong,

Marek Żołędziowski

Co-Founder, President of Group One

Economically, Poland is not only catching up with the strongest European countries, but in many aspects, we are an example for others to follow. The recent distinction our country received in The Economist magazine perfectly highlights this. Today we can talk about great successes, but also huge challenges lie ahead of us. The deregulation project SprawdzaMY is an initiative that brought together companies and organisations in Poland to tackle one of their needs - the need to simplify the law and prepare Poland for a better future. We joined her because there are many objective obstacles in conducting business in Poland, which particularly affect smaller, several and dozen-person companies. If we do not introduce improvements and legal and financial facilitations, we will halt the potential for growth of our economy and innovation. I appreciate the strength of Polish business and its unity at a time when it is necessary to build new foundations for development and success with determination.

GENESIS PR, a communications agency with over 30 years of experience in the market, specialising in public relations, public affairs and integrated corporate and educational communication. Since its inception, the agency has implemented over 700 long-term informational and image campaigns for companies, public institutions and non-governmental organisations.

GENESIS PR offers comprehensive strategic consulting in the fields of reputation management, crisis communication, investor relations, media collaboration, as well as the creation and implementation of multidimensional communication strategies. The agency combines the highest standards of planning and implementing PR activities with advanced reporting methods, ensuring full support for clients at every stage of cooperation.

Dr Eliza Misiecka

Founder, Head of Genesis PR

Working in the Deregulation Team of the SprawdzaMY Initiative is a unique experience for me. The people making up this team, under the inspiring leadership of Rafał Brzoska, have brought an extraordinary, positive energy into my life, which is hard to fully express in words. From the very beginning, I was convinced that Rafał Brzoska not only wants but, above all, is capable of effectively working for the good of Poland. Joint action has brought me not only new challenges, but above all, it has allowed me to meet people full of passion, energy and commitment, who believe in a real change for the better. Under the leadership of Rafał Brzoska, who leads the entire team with remarkable determination and vision, I had the opportunity to participate in activities that can truly transform the face of the Polish economy and social life. From the first moment, I had no doubts that Rafał Brzoska is a leader who not only talks about the need for change but most importantly knows how to implement it effectively. Every day in the SprawdzaMY Initiative is an opportunity to influence the reality we want to be a part of - a more friendly, efficient and modern Poland. I am proud to be a part of this project.

Rafał Brzoska Foundation, a foundation established in 2022 by the founder of InPost, supports young, talented individuals from challenging backgrounds in their educational and personal development. It runs a nationwide scholarship programme for individuals aged 13-25, offering educational funding, mentoring and psychological support. So far, the foundation has donated over 11 million PLN, enabling education at 43 universities in 12 countries. It creates a support network based on knowledge, values and relationships, educating a new generation of conscious leaders.

Rafał Brzoska

Philanthropist, Founder of the Rafał Brzoska Foundation

The Rafał Brzoska Foundation supports young talented individuals on their path to further development. The Foundation fulfils its mission by conducting educational and developmental programmes. The first of these is the Scholarship Fund. Our scholarship recipients have the opportunity to study at the best universities around the world and as a result, they will make a significant contribution to Poland in the future. And today, they have already engaged in the SprawdzaMY Initiative - assisting in the process of analysis, application of modern technologies and AI in organising over 16 thousand submissions that we have received. Thank you very much for your enthusiasm and the time you›ve devoted - philanthropy in everyday actions is important to me and I know that you share these values.

Compass & Partners, a Polish consulting firm supporting medium and large enterprises in operational, process and strategic transformation. Since 2015, she has completed over 170 projects for companies in industries including finance, pharmaceuticals, IT and commerce. It operates based on the proprietary Compass Needle methodology, ensuring a quick return on investment and lasting effects. It also develops the Compass Training Center and Technology Lab - offering training, mentoring and digital tools that support organisational efficiency and customer service.

Dawid Pyszniak

CEO Compass & Partners

As Compass & Partners, we fully support the SprawdzaMY initiative, recognising its unique character and significance for the Polish economy. We believe that this is a breakthrough moment in which entrepreneurs gain a real voice in the process of shaping the law, responding to the actual needs of the market. We are pleased to participate in such a significant and necessary initiative.

SUPPORTING ORGANISATIONS

































































SprawdzaMY

Authors of the report

Partners of the SprawdzaMY Initiative