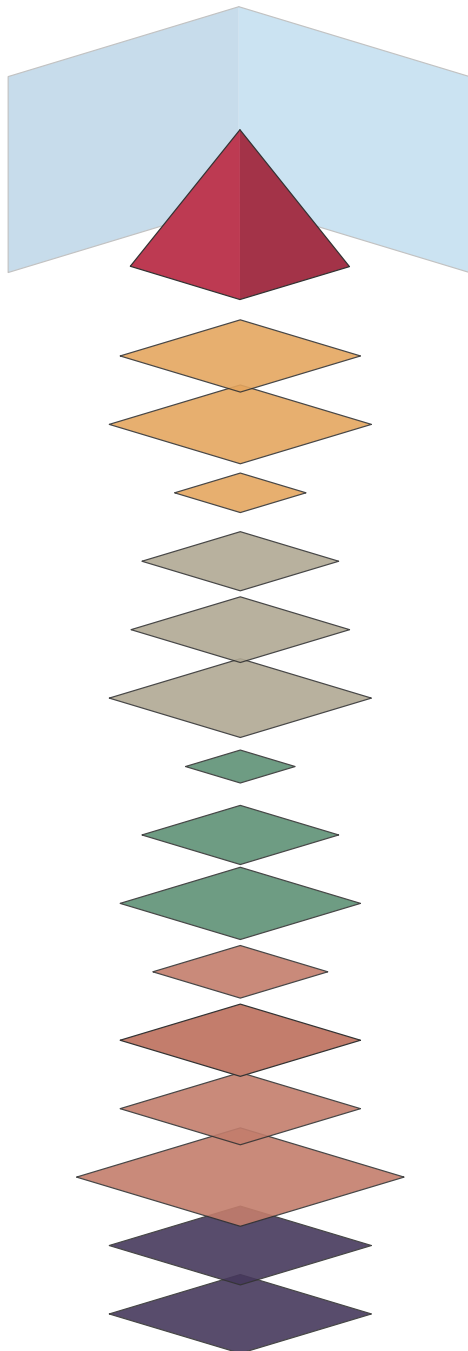


POLAND



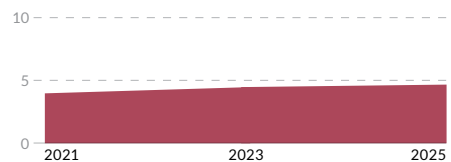
4.67 $\nearrow 0.18$

CRIMINALITY SCORE

123rd of 193 countries $\nearrow 2$

26th of 44 European countries $\nearrow 2$

14th of 17 Central and Eastern European countries $\nearrow 2$



CRIMINAL MARKETS

5.13 $\nearrow 0.17$

HUMAN TRAFFICKING	5.50	0.00
HUMAN SMUGGLING	6.00	0.00
EXTORTION & PROTECTION RACKETEERING	3.00	$\nearrow 0.50$
ARMS TRAFFICKING	4.50	0.00
TRADE IN COUNTERFEIT GOODS	5.00	$\nearrow 0.50$
ILLCIT TRADE IN EXCISABLE GOODS	6.00	$\nearrow 0.50$
FLORA CRIMES	2.50	0.00
FAUNA CRIMES	4.50	$\searrow 0.50$
NON-RENEWABLE RESOURCE CRIMES	5.50	0.00
HEROIN TRADE	4.00	0.00
COCAINE TRADE	5.50	$\nearrow 0.50$
CANNABIS TRADE	5.50	0.00
SYNTHETIC DRUG TRADE	7.50	$\nearrow 0.50$
CYBER-DEPENDENT CRIMES	6.00	$\nearrow 0.50$
FINANCIAL CRIMES	6.00	0.00



CRIMINAL ACTORS

4.20 $\nearrow 0.20$

MAFIA-STYLE GROUPS	2.00	0.00
CRIMINAL NETWORKS	6.00	0.00
STATE-EMBEDDED ACTORS	4.50	0.00
FOREIGN ACTORS	4.00	$\nearrow 0.50$
PRIVATE SECTOR ACTORS	4.50	$\nearrow 0.50$



This project was funded in part
by a grant from the United
States Department of State.

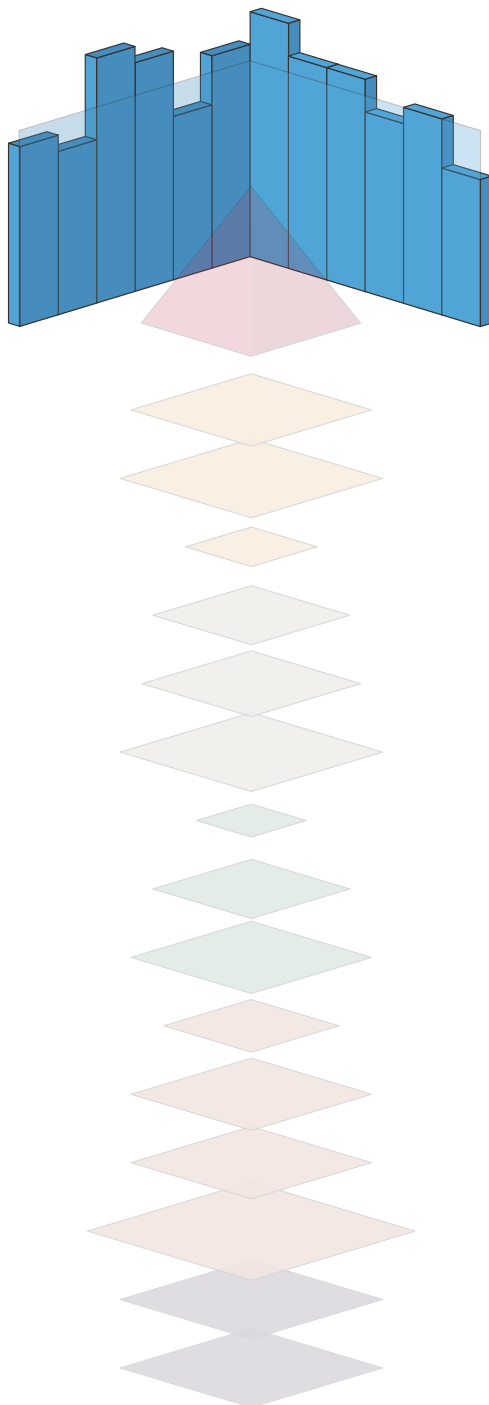


Funded by
the European Union

ENACT is funded by the European Union
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Security Studies and INTERPOL, in
affiliation with the Global Initiative Against
Transnational Organized Crime.



POLAND



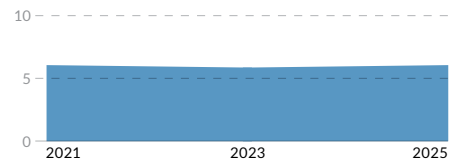
6.08 $\nearrow 0.21$

RESILIENCE SCORE

36th of 193 countries $\nearrow 6$

25th of 44 European countries $\nearrow 2$

3rd of 17 Central and Eastern European countries $\nearrow 2$



POLITICAL LEADERSHIP AND GOVERNANCE	5.50	0.00
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	5.00	$\nearrow 1.00$
INTERNATIONAL COOPERATION	7.50	0.00
NATIONAL POLICIES AND LAWS	7.00	0.00
JUDICIAL SYSTEM AND DETENTION	5.00	0.00
LAW ENFORCEMENT	6.50	0.00
TERRITORIAL INTEGRITY	7.50	0.00
ANTI-MONEY LAUNDERING	6.50	0.00
ECONOMIC REGULATORY CAPACITY	6.50	0.00
VICTIM AND WITNESS SUPPORT	5.50	$\nearrow 0.50$
PREVENTION	6.00	$\nearrow 0.50$
NON-STATE ACTORS	4.50	$\nearrow 0.50$



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CRIMINALITY

CRIMINAL MARKETS

PEOPLE

Poland serves as a source, transit and destination country for human trafficking, with forced labour being the most prevalent form of exploitation. Victims primarily include foreign nationals, particularly from Africa, Asia and other Eastern European countries, with notable increases in trafficking involving individuals from Belarus, Ukraine, Vietnam and North Korea. Women and children from Eastern and south-eastern Europe remain especially vulnerable to sexual exploitation and forced prostitution. Domestic victims, often from marginalized communities, are trafficked abroad to Western and Northern Europe for labour exploitation, forced begging and benefit fraud. Criminal groups frequently use online advertisements to recruit individuals, subsequently coercing them into exploitative conditions, such as the confiscation of identity documents, poor living and working environments, unpaid labour and cycles of debt. The influx of Ukrainian refugees has increased vulnerabilities, with millions crossing into Poland and becoming potential targets for traffickers. Reports indicate an increase in exploitation through deceptive employment offers, transportation scams and coerced sex work. Corruption among state officials, including labour inspectors and border guards, has contributed to the persistence of forced labour cases.

Human smuggling networks exploit Poland's position as a major transit country, particularly along the Belarusian border. Routes originating from the West Asia and Africa and pass through Belarus, Türkiye or Russia before reaching Poland and continuing toward Western Europe. Most irregular crossings involve third-country nationals, primarily entering through land borders, with a growing trend in attempts through air travel. In 2023, the primary nationalities of migrants included Syrians, Ukrainians, Turks, Georgians and Afghans. The involvement of foreign state actors has further exacerbated migration flows, with smugglers utilizing fraudulent documentation, cash-for-visa schemes and covert transport networks. While Poland has intensified border controls in 2024, it remains a key transit hub for organized smuggling operations, although the volume of crossings has slightly declined.

Extortion and protection racketeering continue to exist in Poland, although they are largely opportunistic rather than systematically controlled by criminal organizations. There has been a rise in cyber-related extortion, particularly involving fraudulent loan schemes and digital threats. Organized groups have started to shift their extortion activities to online platforms, leveraging the dark web for illicit financial operations.

TRADE

Poland functions as both a transit and, to a lesser extent, a destination country for arms trafficking. Criminal groups exploit Poland's geographical position and the open borders of the EU to smuggle firearms, ammunition and deactivated weapons. Recent trends indicate an increase in illegal arms exports to Sweden, Ukraine and Libya. While there is some evidence suggesting that the demand for firearms is rising within the country, the local market primarily operates online and on a smaller scale through individually concealed weapons caches located throughout Poland. While law enforcement has dismantled several trafficking networks, the country continues to face emerging risks associated with illicit 3D-printed firearms and increased arms flows due to regional conflicts.

The counterfeit goods market in Poland remains extensive, driven by high public demand and the prevalence of e-commerce platforms. Poland ranks among the top destinations in the EU for counterfeit imports, with significant volumes of counterfeit toys, clothing and cosmetics circulating within the country. Organized networks utilize Poland as both a production and transit hub, employing carousel fraud schemes that connect Polish companies to broader European counterfeit distribution networks. Notably, counterfeit tobacco production is particularly prominent, with Polish factories manufacturing illicit cigarettes for export to Western European markets.

Illicit trade in excise consumer goods, including cigarettes and alcohol, continues to be an issue. Poland functions as a source, transit and destination country for untaxed tobacco and alcohol products, with smuggling routes linking Belarus, Ukraine and Russia. Criminal networks exploit tax discrepancies between Poland and its neighbouring states, and despite government crackdowns, the illicit cigarette trade continues to thrive. While Poland's internal market for illegal goods is relatively small, the country remains a significant hub for transit and sourcing of various illicit products, particularly cigarettes destined for Western and Northern Europe.

ENVIRONMENT

Illegal flora trade in Poland remains relatively limited, but concerns persist regarding timber smuggling. Criminal groups have engaged in fraudulent documentation schemes to bypass EU sanctions, allowing timber of Russian origin to enter Polish markets under false claims of originating from Kazakhstan or Kyrgyzstan. Reports indicate that organized actors launder illicit timber through legitimate sawmills before exporting it to EU destinations.

Poland is both a transit and, to a lesser extent, a destination country for wildlife trafficking. Smuggling networks import protected species, including live birds, reptiles and caviar, before distributing them to Western Europe. Loopholes in Poland's permit system have enabled traffickers to exploit legal breeding permits for illicit wildlife shipments. The Polish-Ukrainian border remains a hotspot for illegal wildlife trade, with a growing number of seizures of protected specimens, including corals, snake-derived products and medicinal items containing animal derivatives.

Non-renewable resource crimes in Poland encompass the illegal mining of coal, amber and minerals. While Poland's coal industry remains heavily regulated, the emergence of unauthorized mining pits has heightened concerns regarding the involvement of organized crime. The illicit amber trade, which involves smuggling raw materials primarily from Ukraine, is then processed in Polish workshops and sold in international markets, yielding significant profits for criminal networks. Additionally, Poland serves as a key transit country for fuel smuggling, with organized groups laundering diesel and gasoline imports to evade excise taxes.

DRUGS

Poland primarily functions as a transit country for heroin trafficking, with supply routes originating in Afghanistan and passing through the Balkans and Türkiye before reaching Western Europe. While domestic consumption remains relatively low and further decreasing, organized crime groups continue to facilitate heroin smuggling to Germany and the UK. The decline in local heroin use is largely attributed to reduced availability caused by disruptions in trafficking routes, particularly due to the war in Ukraine, as well as a growing preference for cannabis and synthetic drugs among users.

Cocaine trafficking has surged, with Poland emerging as both a transit and destination country. Latin American suppliers transport cocaine through Polish ports, concealing shipments within legitimate cargo. Nigerian and European criminal networks oversee distribution, and domestic consumption is rising despite the drug's high cost. Major seizures in 2024 indicate Poland's expanding role in the European cocaine market.

The cannabis market in Poland is notable, encompassing both domestic cultivation and imports from Western Europe. Criminal networks operate sophisticated indoor plantations, often concealing operations within legitimate agricultural enterprises. Polish traffickers also collaborate with Czech and Spanish groups to smuggle cannabis into Poland. Despite the legalization of cannabis for medical use, the illicit market remains robust, with smuggling routes linked to broader drug distribution networks and illegal cultivation.

Poland is a key producer and transit country for synthetic drugs, particularly amphetamines. Polish laboratories manufacture synthetic stimulants for export, primarily to Scandinavian countries, as well as Germany, the UK and Ireland, leveraging Poland's well-established supply chains. In 2024, law enforcement dismantled a record number of synthetic drug laboratories, revealing the scale of domestic production. While amphetamine use remains relatively low in Poland, the emergence of synthetic opioids and new psychoactive substances presents growing challenges. The discovery of a large-scale methadone production facility highlights Poland's evolving role in synthetic drug manufacturing.

CYBER-DEPENDENT CRIMES

Cybercrime in Poland has increased, driven by ransomware attacks and malware. Cybercriminals are targeting financial institutions, e-commerce platforms and individuals, employing sophisticated hacking techniques. The landscape of cybercrime in Poland has been shaped by geopolitical factors, with state-sponsored actors and hacktivist groups. The proliferation of underground hacking forums and illicit digital marketplaces continues to pose challenges for law enforcement.

FINANCIAL CRIMES

Financial crimes in Poland continue to pose a significant challenge, with VAT fraud and tax evasion schemes inflicting considerable economic damage. Organized criminal networks exploit loopholes to engage in invoice fraud, carousel schemes and investment scams, draining state resources. Notably, investment fraud has surged, with criminals impersonating prominent individuals and institutions to lure victims into fraudulent schemes that promise high returns. The growing use of advanced technologies, including deepfake videos and AI-generated content, has enhanced the credibility of these scams, making them more difficult to detect. Additionally, other cyber-enabled financial crimes, such as fictitious online stores and remote desktop scams, have become increasingly sophisticated, further complicating law enforcement efforts. Corruption remains a persistent issue, with investigations uncovering links between high-profile political figures and fraudulent financial activities.

CRIMINAL ACTORS

Poland remains largely free from traditional mafia-style groups, as the once-prominent Pruszków and Wołomin mafias have lost much of their influence due to effective law enforcement operations. However, remnants of these groups persist, with older members attempting to regain influence after their release from prison. Their reintegration efforts have been met with varying degrees of success, as newer, more decentralized criminal networks have taken control of many illicit markets. These successor groups often

consist of smaller gangs linked to sports clubs and football hooligan communities, focusing on drug trafficking and money laundering. While their structure is less hierarchical than that of traditional mafia groups, their adaptability presents new challenges for law enforcement. Despite high levels of police infiltration, public fears of mafia-style groups persist and are sometimes exploited for political narratives. Reports from the Central Investigation Bureau of Police confirm that the terminology in official discourse has shifted toward organized criminal groups rather than mafia-style organizations.

Poland's criminal networks operate in a highly flexible and opportunistic manner, engaging in a wide range of illicit activities, including human trafficking, drug smuggling and arms trafficking. These groups exploit Poland's strategic position as a European transit hub, facilitating the movement of illicit goods and people across borders. These networks encompass local, regional and transnational actors and have demonstrated remarkable adaptability to geopolitical and socio-economic changes, such as the war in Ukraine and the Belarusian–EU border crisis. They frequently integrate legitimate business structures into their operations, leveraging legal loopholes and corrupt connections to facilitate illicit trade and financial crimes. Criminal networks are deeply embedded throughout Poland, with major urban centres such as Warsaw, Kraków, Wrocław and Poznań serving as key hubs for organized criminal activities. While some groups employ violent enforcement tactics, the majority prefer to operate discreetly, laundering illicit proceeds through front businesses and legitimate enterprises to evade detection.

Corruption within Poland's state institutions has enabled various forms of organized crime, including human trafficking, arms smuggling and financial fraud. Some state-embedded actors have contributed to these crimes by issuing fraudulent work permits, assisting in smuggling operations or misusing public funds. A high-profile scandal in 2023 exposed large-scale visa fraud involving Polish consulates in Africa and Asia, with state officials implicated in the improper issuance of over 200 000 work visas. This scheme raised concerns about the extent to which state actors may be complicit in human smuggling and trafficking operations. Additionally, reports indicate that some border enforcement officials have enabled the smuggling of illicit goods, including weapons and drugs. Financial crimes linked to state-embedded actors include VAT fraud and the misallocation of public funds. Investigations have uncovered instances where officials manipulated tax regulations and engaged in fraudulent financial schemes, thereby exacerbating Poland's challenges in combating organized crime.

Foreign criminal actors play a moderate role in Poland's organized crime landscape, particularly in human trafficking, drug smuggling, arms trafficking and the distribution of counterfeit goods. Due to Poland's strategic location within Europe, these groups exploit the open borders of the EU

to facilitate illicit trade. Many foreign networks collaborate with domestic criminal organizations to enhance their operations. Vietnamese and Filipino nationals have been involved in forced labour schemes, while individuals from Syria, Iraq and Georgia are linked to human smuggling networks operating through Poland. Russian-speaking organized crime groups, including those from Georgia and Ukraine, have also participated in smuggling migrants across Poland's eastern border. The influx of refugees from Ukraine has provided new opportunities for criminal networks engaged in human trafficking. Foreign actors are also active in Poland's narcotics trade, with Dutch criminal organizations exerting significant influence over the country's drug markets. Additionally, the Italian mafia, particularly the 'Ndrangheta, has been linked to occasional arrests in Poland, indicating limited but noteworthy connections to Polish criminal networks.

Private-sector actors in Poland play a role in facilitating organized crime, particularly in financial crimes such as VAT fraud, money laundering and counterfeit goods trafficking. Criminal networks frequently use legitimate businesses as fronts for illicit activities, exploiting regulatory gaps to evade law enforcement. One of the most prevalent financial crimes in Poland is VAT fraud, with organized groups engaging in carousel fraud schemes and employing shell companies to circumvent tax regulations. Offshore accounts, intermediary banking services and cryptocurrency exchanges are commonly used to launder illicit proceeds. The production and distribution of counterfeit goods, including clothing, electronics and pharmaceuticals, continue to pose significant challenges. Many counterfeit products are either produced locally or imported before being sold through e-commerce platforms and physical markets.

Additionally, businesses involved in transportation and logistics have been implicated in facilitating the smuggling of excise goods such as alcohol and tobacco. Human trafficking and labour exploitation also intersect with private-sector activities, particularly in industries that rely on undocumented workers. Some businesses have been found to engage in exploitative labour practices, taking advantage of gaps in labour protections for migrant workers. On a broader scale, the infiltration of private-sector entities by criminal networks remains a critical issue, with businesses being used as vehicles for money laundering and fraud.

RESILIENCE

LEADERSHIP AND GOVERNANCE

Poland's political leadership has demonstrated a commitment to combating organized crime, although its prioritization remains inconsistent. While all major political parties recognize the necessity of addressing organized crime, concrete policy actions often focus on economic crime, particularly efforts to close the VAT tax gap. This approach reflects a broader effort to recover lost revenues rather than a strategic crackdown on organized criminal networks. Additionally, public trust in political institutions is low, driven by ongoing corruption scandals, judicial controversies and the ruling party's influence over state institutions. The October 2023 parliamentary elections, which resulted in a victory for a centrist coalition, marked a shift in governance. However, the new administration's primary focus remains on economic and political restructuring rather than directly addressing organized crime.

Transparency and accountability in governance have raised concerns, particularly regarding judicial reforms initiated by the former ruling party. While the new government has dissolved the Central Anti-Corruption Bureau (CBA), citing its politicization, broader systemic challenges persist. The state's anti-corruption efforts have faced criticism for their perceived lack of impartiality, with ongoing investigations primarily targeting former officials. Although Poland has introduced technical measures to improve transparency, such as the national e-invoicing system and public access to parliamentary proceedings, systemic issues regarding accountability remain unaddressed.

Poland actively participates in international efforts to combat organized crime by collaborating with organizations such as Europol, INTERPOL and the European Public Prosecutor's Office. The country has ratified key international treaties, including the UN Convention against Transnational Organized Crime and the Arms Trade Treaty. Poland's recent decision to strengthen cooperation with NATO in response to regional security threats highlights its evolving approach to international security cooperation.

The country's legislative framework criminalizes various forms of organized crime, including human trafficking, drug trafficking and cybercrime. However, enforcement gaps remain, particularly in areas such as wildlife trafficking, where poaching and illegal trade are not formally recognized as criminal offenses. Recent amendments to the Penal Code have increased penalties for corruption and financial crimes; however, stakeholders have raised concerns about the proportionality of these measures. Additionally, Poland has introduced new cybersecurity regulations to address the growing threat of cyber-enabled crimes.

CRIMINAL JUSTICE AND SECURITY

Poland's judicial system plays a crucial role in combating organized crime, but it faces significant structural challenges. Judicial independence has long been a concern, as previous government reforms have undermined the separation of powers. Recent efforts to restructure the judiciary aim to restore independence and transparency, although their effectiveness remains uncertain. The backlog of organized crime cases and protracted judicial proceedings continue to strain the system, raising questions about efficiency and the guarantees of a fair trial.

Law enforcement agencies, including the Central Bureau of Investigation and the Internal Security Agency, are actively involved in combating organized crime. However, inter-agency coordination remains weak, with fragmented data-sharing mechanisms impeding efficiency. The planned redistribution of the CBA's responsibilities to other agencies aims to depoliticize anti-corruption efforts but presents challenges in maintaining operational continuity, especially in complex, cross-border investigations. Poland participates in international law enforcement cooperation, leveraging resources from Europol and INTERPOL to target transnational criminal networks.

Poland's location along the eastern border of the EU makes it a key entry point for the smuggling of various goods, particularly tobacco and cigarettes. Its border security has come under further strain due to regional crises, including the Belarus-EU border tensions and the Russian invasion of Ukraine – both of which have been exploited by criminal groups to facilitate human smuggling and trafficking. Despite these pressures, the Polish Border Guard remains a well-organized and operationally capable institution, having increased patrols and enhanced cooperation with partners such as neighbouring countries, Frontex, Europol and Eurojust. The Polish government has also intensified border control efforts, particularly along the border with Belarus, to manage migration flows – though these measures have raised concerns over potential human rights violations. Nevertheless, Poland continues to face persistent challenges in fully detecting and intercepting illicit cross-border activities.

ECONOMIC AND FINANCIAL ENVIRONMENT

Poland's anti-money laundering framework has undergone improvements, although enforcement remains inconsistent. The General Inspector of Financial Information is tasked with monitoring suspicious financial transactions and coordinating with law enforcement agencies. However, international assessments have identified weaknesses in Poland's ability to disrupt illicit financial flows. A limited

understanding of money laundering risks, combined with the lack of a comprehensive national coordination platform, continues to pose challenges. Moreover, the country is also struggling to align its national policies with EU anti-money laundering regulations.

The economic regulatory environment in Poland has been influenced by recent global and regional economic challenges, including the COVID-19 pandemic and the war in Ukraine. The country's grey economy has expanded, particularly in sectors such as construction, transportation and hospitality. This expansion has created vulnerabilities that organized criminal groups exploit, including unregistered employment and tax evasion.

state institutions, including those overseeing internal security, the judiciary and law enforcement. Despite these challenges, civil society organizations remain vocal in advocating for anti-corruption measures and stronger protections for victims of organized crime, often filling the gaps left by state institutions.

This summary was funded in part by a grant from the United States Department of State. The opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of the United States Department of State.

CIVIL SOCIETY AND SOCIAL PROTECTION

During the reporting period, the Polish government enhanced victim protection efforts, offering shelter, medical and psychological care, legal aid and reintegration support. Victim identification tools were improved with updated, trauma-informed procedures, and a national referral mechanism was finalized, pending approval. Authorities screened vulnerable groups, including migrants, though controversial pushbacks at the Belarus border raised concerns about unidentified trafficking victims being returned. Funding for victim services increased for the first time since 2015, with additional resources allocated to train social workers. However, gaps remained in support for unaccompanied children and in shelter capacity for male victims. Efforts to prevent organized crime in Poland primarily focus on public awareness campaigns, as well as drug prevention and harm reduction initiatives. The government has also collaborated with NGOs to develop intervention strategies aimed at preventing exploitation. However, these prevention efforts are often fragmented, characterized by inconsistencies in regional implementation and a lack of sustained funding, which limits their long-term effectiveness. Drug prevention strategies have also been expanded, with campaigns highlighting the dangers of narcotics and synthetic drugs being rolled out. However, access to rehabilitation programs remains uneven, particularly in rural areas where the availability of substance abuse treatment is limited.

Non-state actors, including civil society organizations and media outlets, play a crucial role in exposing organized crime and holding authorities accountable. However, press freedom has faced notable restrictions, particularly under the previous administration, which exerted substantial pressure that further limited independent journalism. Nevertheless, the newly elected Parliament passed a resolution calling for the restoration of impartiality in public media, which has taken important steps in this regard. However, the media's ability to report on organized crime in Poland has been significantly undermined by the systematic marginalization of journalistic investigations into misconduct within key