Przegląd Europejski – European Studies Quarterly, **ISSN: 1641-2478**
vol. 2026 no. 3
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DOI: https://doi.org/10.31338/1641-2478pe.3.26.5

Access of third-country nationals to the EU labour market as an instrument for achieving internal market objectives: comparative analysis of Poland and Germany

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Abstract
The article examines whether access of third-country nationals to the EU labour market has become an instrument supporting internal market objectives. Using the comparative analysis of legal acts, demographic situation and labour market in Germany and Poland, the author assesses the EU's and national migration frameworks in the context of declining intra-EU mobility and labour shortages. The findings demonstrate two different models: Germany increasingly manages labour supply through selective, skills-oriented immigration, while Poland remains predominantly demand-driven. The migration of third-country nationals, therefore, complements the free movement of workers, and it is becoming an increasingly important condition for competitiveness and demographic sustainability.
Keywords: European Union, Germany, Poland, free movement of workers, labour migration, internal market, third-country nationals, demographic ageing

Dostęp obywateli państw trzecich do rynku pracy Unii Europejskiej jako instrument realizacji celów rynku wewnętrznego: analiza porównawcza Polski i Niemiec

Streszczenie
Artykuł analizuje dostęp obywateli państw trzecich do rynku pracy Unii Europejskiej jako instrument wspierający realizację celów rynku wewnętrznego. Na podstawie analizy porównawczej regulacji prawnych i sytuacji demograficznej oraz rynku pracy w Niemczech i Polsce oceniono unijne i kra-

jowe rozwiązania w zakresie migracji zarobkowej w kontekście malejącej mobilności pracowników wewnątrz UE oraz narastającego niedoboru siły roboczej. Wyniki badania wskazują na dwa odmienne modele. Niemcy w coraz większym stopniu kształtują podaż pracy poprzez selektywną politykę imigracyjną ukierunkowaną na pozyskiwanie pracowników o określonych kwalifikacjach, podczas gdy polski model pozostaje w przeważającej mierze odpowiedzią na bieżące zapotrzebowanie rynku pracy. Migracja obywateli państw trzecich uzupełnia zatem swobodę przepływu pracowników i staje się coraz ważniejszym czynnikiem wspierającym konkurencyjność gospodarki oraz łagodzącym skutki niekorzystnych zmian demograficznych.
Słowa kluczowe: Unia Europejska, Niemcy, Polska, swoboda przepływu pracowników, migracja zarobkowa, rynek wewnętrzny, obywatele państw trzecich, starzenie się społeczeństwa.

The free movement of persons constitutes one of the most significant achievements of European integration and one of the four fundamental freedoms underpinning the internal market. Together with the free movement of goods, services and capital, labour mobility forms the foundation of the European Union's economic architecture. Since the Treaty of Rome, the elimination of barriers to labour mobility has been regarded as a prerequisite for the efficient allocation of resources and the functioning of the common market. Over time, the freedom of movement has evolved from a purely economic mechanism designed to facilitate the mobility of workers into one of the essential attributes of Union citizenship.

Contrary to expectations that the free movement of workers would continue to provide a sufficient adjustment mechanism for labour shortages, intra-EU mobility has exhibited signs of saturation. During the last five years, the number of economically active persons exercising free movement rights remained broadly stable, amounting to approximately 10.1 million in 2024, while the total number of EU citizens residing in another Member State reached around 14 million (Garzon 2026: p. 1). Germany, which for decades benefited substantially from migration flows originating in Central and Eastern Europe, experienced a decline in annual inflows of EU citizens from 624,375 in 2016 to 407,300 in 2024 (Weber 2025: p. 7). The diminishing migration surplus indicates that the reservoir of labour available within the Union is becoming increasingly constrained, as demographic ageing and labour shortages affect virtually all Member States simultaneously. Consequently, intra-European mobility alone appears insufficient to ensure an adequate labour supply for European economies.

As demographic reserves in Central and Eastern Europe become exhausted, labour migration from third countries is acquiring growing importance. European economies are increasingly dependent on workers originating from outside the European Union. Migration policy is therefore no longer perceived solely through humanitarian or security lenses, but it is increasingly regarded as an instrument of economic and demographic policy (Tverdostup 2024: p. 9). Through various legal mechanisms, including the EU Blue Card Directive and long-term resident status, the European Union seeks to attract human capital and ensure the competitiveness of its economies.

This transformation is particularly visible in Germany and Poland. Germany, facing severe shortages of skilled workers and rapid population ageing, has undertaken extensive reforms

of its migration legislation aimed at attracting highly qualified migrants. Through the *Skilled Immigration Act* and subsequent reforms, the country has gradually shifted from passive migration management towards active labour supply management (Heß 2025: p. 14–27). Poland, by contrast, has become a country of immigration only relatively recently. Although demographic challenges are equally severe, its migration model remains predominantly demand-driven and reflects the structure of the Polish economy, which continues to rely heavily on manufacturing and labour-intensive industries. Sustained inflows of foreign direct investment, amounting to USD 41.78 billion in 2025 and representing approximately 0.35% of global investment flows, have strengthened labour demand, particularly in production, logistics, construction and other low- and medium-skilled occupations (Balza et al. 2026: p. 50). Consequently, Poland has emerged as an important destination for foreign workers employed primarily in sectors requiring large numbers of manual and routine workers rather than highly specialised professionals (GUS 2025a).

The aim and research methodology

The aim of this article is to examine whether access of third-country nationals to the labour market has become an instrument for achieving the objectives of the European internal market. The paper seeks to determine whether migration from outside the European Union should be interpreted merely as a response to labour shortages or whether it constitutes a continuation of the original objectives pursued by the free movement of workers. Particular attention is devoted to the interaction between demographic developments, labour mobility and migration policies in Germany and Poland.

The central hypothesis of this study is that labour migration from third countries has evolved from a supplementary phenomenon into an essential instrument of economic and demographic policy. Moreover, Germany and Poland represent two distinct models of migration governance. Germany increasingly employs a selective and skills-oriented strategy aimed at attracting human capital, whereas Poland continues to rely predominantly on the inflow of lower- and medium-skilled workers to alleviate labour shortages. Despite these differences, both countries increasingly depend on migration from third countries to sustain economic growth and maintain the functioning of the internal market.

The methodology of this study includes a qualitative comparative research design combining legal analysis with demographic and labour market analysis. The primary research method is the dogmatic-legal method, used to examine the legal framework governing access of third-country nationals to the labour markets of the European Union, Germany and Poland. The analysis focuses on the interpretation of the Treaty on the Functioning of the European Union, relevant EU secondary legislation, including directives and regulations concerning labour migration, and the principal national legal acts regulating the employment of third-country nationals.

The legal analysis is complemented by the comparative method. Germany and Poland were selected because they represent two distinct models of labour migration governance within the European Union. Germany has developed a selective, skills-oriented

migration policy aimed primarily at attracting highly qualified workers, whereas Poland has traditionally relied on demand-driven labour migration responding to shortages in labour-intensive sectors. The comparison therefore enables an assessment of how different national approaches contribute to the broader objectives of the internal market.

The empirical component of the study is based on secondary statistical data obtained from Eurostat, the European Commission, the German Federal Statistical Office (Destatis), the German Federal Office for Migration and Refugees (BAMF), Statistics Poland (GUS), the World Bank and other official public institutions. The analysis includes demographic indicators (fertility rates, life expectancy, median age), labour market indicators, migration flows and data concerning residence permits and employment of third-country nationals. These indicators were selected because they directly reflect demographic pressures and labour shortages that increasingly shape migration policy within the European Union.

The combination of legal, comparative and statistical analysis makes it possible to evaluate whether the admission of third-country nationals should be regarded solely as a national migration policy instrument or also as a mechanism supporting the objectives of the European internal market.

Free movement of workers in the European Union and its limits

The free movement of workers constitutes one of the cornerstones of European integration and one of the most visible manifestations of the internal market (Schmidt et al. 2018: p. 1392). Together with the free movement of goods, services and capital, labour mobility forms the foundation of the economic architecture of the European Union. From the very beginning of European integration, the elimination of obstacles preventing workers from moving across national borders was regarded as essential for creating a common market and ensuring the efficient allocation of resources. Labour mobility was expected to facilitate economic growth, reduce regional disparities and contribute to the convergence of national economies (Barslund, Busse 2016: p. 2–3).

The origins of the free movement of workers can be traced back to the Treaty establishing the European Economic Community of 1957. The Treaty of Rome recognised that the creation of a common market required not only the abolition of customs barriers and restrictions on trade, but also the free circulation of labour (EEC Treaty 1957: art. 48(1)). Workers had to be able to move from regions characterised by labour surpluses and high unemployment to areas experiencing labour shortages. Consequently, labour mobility was conceived primarily as an economic instrument designed to maximise productivity and ensure the optimal allocation of human resources.

Today, the legal foundations of labour mobility are contained primarily in Articles 45-48 of the Treaty on the Functioning of the European Union. Article 45 TFEU guarantees the free movement of workers and prohibits discrimination based on nationality regarding employment, remuneration and other working conditions (TFEU: art. 45–48). The right to move freely for employment purposes is further reinforced by Regulation (EU) No 492/2011 on freedom of movement for workers within the Union and by Directive 2004/38/EC con-

cerning the rights of Union citizens and their family members to move and reside freely within the territory of the Member States. Article 45 of the *Charter of Fundamental Rights of the European Union* likewise recognises freedom of movement and residence as one of the fundamental rights associated with Union citizenship (Charter... 2016: art. 45).

The jurisprudence of the Court of Justice of the European Union has played a crucial role in shaping the practical scope of labour mobility. The Court consistently interpreted the concept of "worker" broadly and emphasised that the free movement of workers constitutes one of the foundations of the European Union (Judgment of the Court 1982: par. 13). In cases of Levin, Lawrie-Blum and numerous subsequent cases, the Court developed a functional definition of a worker based on the performance of genuine and effective economic activity in return for remuneration (Judgment of the Court 1982: par. 16–17; Judgment of the Court 1986: par. 16–17). This broad interpretation substantially strengthened the practical significance of labour mobility and transformed it into one of the most developed systems of transnational labour migration in the world (OECD 2012: p. 66–67).

The economic significance of labour mobility extends beyond the rights of individual workers. The free movement of labour contributes to a more efficient allocation of productive resources, improves labour market flexibility and reduces structural imbalances between Member States (European Commission 2018: p. 9–10). It facilitates the transfer of human capital, stimulates innovation and enhances productivity. In addition, labour mobility helps mitigate regional differences in unemployment and contributes to economic convergence. From this perspective, the free movement of workers represents not merely an individual right, but also a mechanism supporting the functioning of the internal market and the competitiveness of the European economy (OECD 2012: p. 66–67).

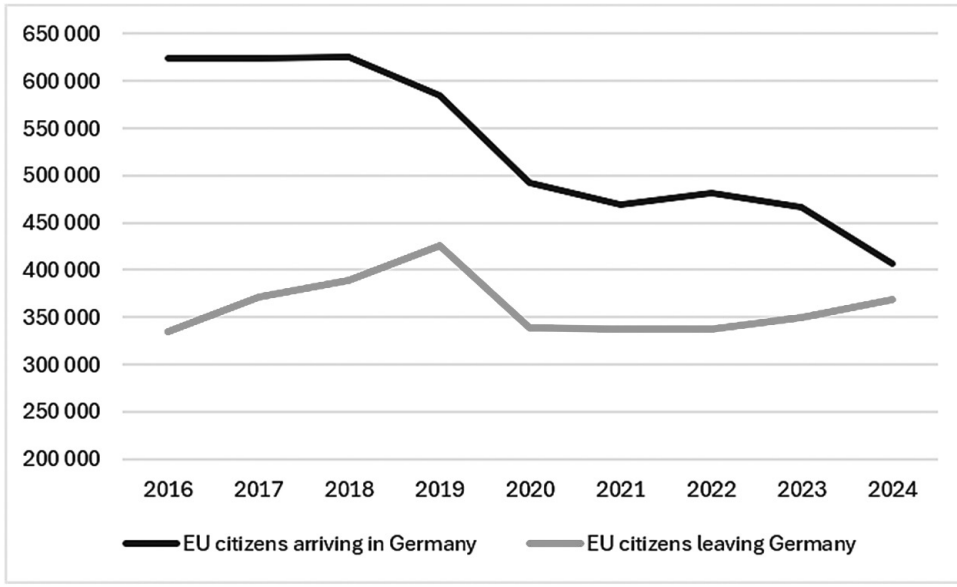
The eastern enlargements of the European Union fundamentally altered the scale and character of labour mobility. Following the accession of Central and Eastern European countries in 2004, 2007 and 2013, more than 4.5 million workers exercised their right to free movement and sought employment in Western Europe (Eurostat 2025a). Germany emerged as one of the principal destinations of these migration flows, receiving an estimated 1.5–2 million migrants from Poland, Romania, Bulgaria and Croatia alone (Graf 2024a). These workers made a significant contribution to economic growth in receiving countries, particularly Germany, by alleviating labour shortages in manufacturing, construction, transport, healthcare and other labour-intensive sectors. Germany's economy expanded strongly in the years following each round of enlargement, recording annual GDP growth rates of 3.9%, 4.1% and 2.2%, respectively, after having experienced a contraction of 0.5% before the 2004 enlargement (World Bank 2026b).

The scale of intra-European mobility remains considerable. Approximately 14 million Union citizens currently reside in another Member State, while 10.1 million economically active individuals work outside their country of nationality (European Commission 2025a; European Commission 2025b). These figures demonstrate the continuing importance of labour mobility for the functioning of the internal market. Nevertheless, demographic developments increasingly expose the limitations of relying exclusively on intra-EU migration. Population ageing, declining fertility rates and shrinking labour forces are affecting

virtually all Member States simultaneously. Countries that previously served as reservoirs of labour supply are themselves beginning to experience shortages of workers.

This phenomenon is particularly evident in Germany. For decades, labour shortages in the German economy have been partially offset by migration from Central and Eastern Europe. However, annual inflows from other EU Member States gradually declined, falling by 35% between 2016 and 2024. Over the same period, annual outflows of EU citizens from Germany increased by 10%, while a cumulative total of 3,252,140 EU citizens left the country between 2016 and 2024 (AZR 2026). These developments indicate that the capacity of intra-EU mobility to compensate for labour shortages has weakened considerably.

Figure 1: Migration flows between EU Member States and Germany, 2016–2024.



Source: AZR 2026.

The changing structure of the foreign population residing in Germany further illustrates this tendency. At the end of 2024, approximately 5 million citizens of other Member States resided in Germany. The largest groups originated from Romania, Poland, Italy, Bulgaria and Croatia.

Table 1: Number of citizens of other EU Member States (excluding persons having German citizenship) residing in Germany, 2023 and 2024.

Citizenship	31 Dec. 2024	31 Dec. 2023	Change
Romania	909 755	909 795	-40
Poland	864 980	887 715	-22 735

Italy	636 730	644 035	-7 305
Bulgaria	432 080	436 860	-4 780
Croatia	425 810	434 045	-8 235
Greece	353 730	359 045	-5 315
Hungary	216 140	220 345	-4 205
Spain	201 810	199 005	2 805
Austria	181 510	184 330	-2 820
Netherlands	148 560	149 770	-1 210
Portugal	140 185	140 275	-90
France	138 250	140 000	-1 750
Czechia	64 320	65 665	-1 345
Slovakia	62 685	64 745	-2 060
Lithuania	56 265	58 045	-1 780
Latvia	40 815	41 590	-775
Belgium	30 335	30 540	-205
Slovenia	26 940	27 665	-725
Sweden	27 830	26 295	1 535
Luxembourg	25 375	25 075	300
Ireland	19 375	20 475	-1 100
Denmark	20 025	19 810	215
Finland	14 305	14 725	-420
Estonia	7 355	7 315	40
Cyprus	3 125	3 040	85
Malta	935	915	20
Total	**5 049 225**	**5 111 120**	**-61 895**

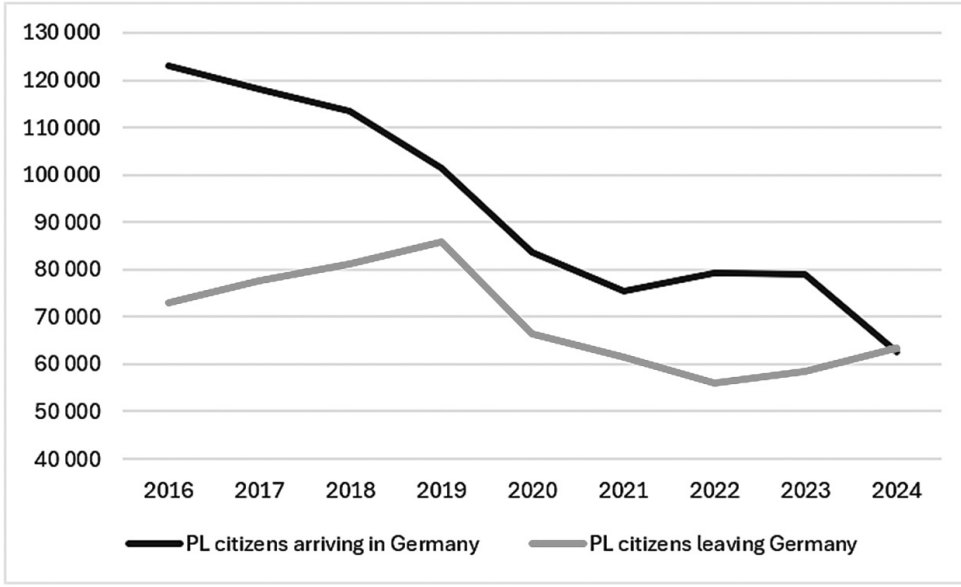
Source: BAMF 2026: p. 350.

Nevertheless, some of these communities have begun to contract. The number of Polish citizens residing in Germany declined from 887,715 at the end of 2023 to 864,980 one year later. Similar decreases were observed among Croatian and Bulgarian nationals.

In the case of Polish citizens, this decline reflects a broader shift in migration patterns. The number of Poles leaving Germany has gradually increased relative to the number arriving in the country. By 2024, this trend had resulted in a negative migration balance: the number of Polish citizens leaving Germany exceeded the number of new arrivals by 695. This development is consistent with the broader trend described above, whereby the number of EU citizens arriving in Germany has been declining, while the number leaving the country has increased. As shown in *Figure 2*, the changing migration pattern

among Polish citizens therefore represents a particularly clear example of the broader deterioration in Germany's intra-EU migration balance (Destatis 2026).

Figure 2: Migration flows of Polish citizens to Germany, 2016–2024.



Source: Destatis 2026a.

The declining effectiveness of intra-EU mobility reflects broader demographic transformations affecting the European continent. Fertility rates in most Member States remain significantly below replacement level, while life expectancy continues to increase. Consequently, labour shortages are no longer concentrated in a small number of highly developed economies, but have become a structural characteristic of the European Union as a whole (European Commission 2025c: p. 13–16). Under these circumstances, the original assumption that labour market imbalances could be corrected solely through the free movement of Union citizens appears increasingly unrealistic.

The growing importance of migration from third countries should therefore not be interpreted as a departure from the principles underlying European integration. On the contrary, access of third-country nationals to the labour market may be viewed as a continuation of the original objectives pursued by the free movement of workers. Both mechanisms are intended to ensure the efficient allocation of labour resources, strengthen productivity and maintain economic competitiveness. Whereas the free movement of workers represented the first stage of labour market integration within Europe, selective immigration policies may increasingly be understood as a complementary stage of this process, reflecting the demographic and economic realities of the twenty-first century. Although migration is only one of several possible responses to labour shortages, along-

side technological innovation, automation, productivity growth and higher labour market participation among older workers, it has become an increasingly important policy instrument for sustaining the functioning of the European internal market.

The evolution of migration policy demonstrates that the internal market cannot be sustained solely through the mobility of Union citizens. The increasing dependence of European economies on labour from outside the Union indicates that migration policy has become an integral component of economic governance. In this sense, the admission of third-country nationals should not be perceived merely as an issue of immigration control or humanitarian policy, but rather as an instrument supporting the long-term functioning and sustainability of the internal market itself.

Legal framework governing access of third-country nationals to the EU labour market

Although the free movement of workers constitutes one of the fundamental freedoms of the European Union, its scope is limited primarily to Union citizens. Third-country nationals do not enjoy an automatic right to enter, reside or work within the territory of the Member States. Their access to the European labour market depends on a complex interaction between national legislation and European secondary law. Nevertheless, over the last two decades the European Union has gradually developed a legal framework designed to facilitate the admission and mobility of selected categories of migrants, particularly highly qualified workers. This development reflects the growing recognition that labour migration constitutes an important instrument supporting economic growth, competitiveness and demographic sustainability.

Unlike the freedom of movement guaranteed by Articles 45–48 TFEU, migration from third countries remains an area characterised by shared competences between the European Union and the Member States. Article 79 TFEU provides the legal basis for the development of a common immigration policy and authorises the Union to adopt measures concerning conditions of entry and residence, rights of legally residing third-country nationals and the fight against irregular migration. However, Member States retain the right to determine the volume of admissions of third-country nationals for employment purposes (TFEU: art. 79). Consequently, European migration policy combines elements of harmonisation with significant national discretion.

One of the most important instruments regulating the position of third-country nationals within the European Union is Council Directive 2003/109/EC concerning the status of long-term residents. The Directive grants long-term resident status to third-country nationals who have legally resided in a Member State for at least five years and who possess sufficient resources and health insurance. Holders of long-term resident status enjoy enhanced protection against expulsion and are entitled to equal treatment with nationals in a variety of areas, including employment, education and social security. Perhaps even more importantly, the Directive provides a limited form of intra-European mobility, enabling long-term residents to move to another Member State for employ-

ment, self-employment or educational purposes (Council Directive 2003/109/EC: art. 4–6, 11–12, 14). In this sense, long-term resident status partially extends the logic of free movement beyond Union citizenship and contributes to the gradual integration of third-country nationals into the internal market.

Another important component of the European migration framework is Directive (EU) 2021/1883 on the EU Blue Card. The Blue Card system, originally introduced in 2009 and significantly reformed in 2021, represents the European Union's principal instrument for attracting highly qualified workers. The Directive was designed in response to increasing global competition for talent and the growing shortage of skilled labour in many Member States. The revised framework applies in twenty-five Member States, with Denmark and Ireland maintaining opt-outs. The Blue Card seeks to establish a common mechanism enabling highly qualified workers from third countries to enter and reside within the European Union while enjoying a wide range of social and economic rights (Directive (EU) 2021/1883).

Eligibility for the EU Blue Card depends primarily on professional qualifications and the existence of a valid employment contract or binding job offer. The 2021 reform introduced greater flexibility by lowering salary thresholds and expanding eligibility to individuals possessing substantial professional experience, even in the absence of formal academic qualifications. Holders of the Blue Card benefit from equal treatment with nationals in matters relating to working conditions, education, social security and access to services. They are also entitled to family reunification under favourable conditions and may acquire long-term resident status after a relatively short period of residence.

Perhaps the most innovative feature of the revised Blue Card Directive concerns mobility within the European Union. Blue Card holders who have already resided in one Member State for a specified period are entitled to move to another Member State under simplified procedures. Consequently, highly qualified migrants increasingly enjoy a degree of mobility resembling the rights associated with Union citizenship. This development reflects the growing recognition that economic competitiveness requires not only attracting talent from outside Europe, but also facilitating the efficient allocation of human capital within the internal market.

The importance of highly skilled migration has repeatedly been emphasised by European institutions. Former Commission President José Manuel Barroso observed that labour migration contributes to economic growth and simultaneously helps address demographic challenges associated with population ageing. Similar arguments have been advanced by the European Commission in numerous policy documents, including the New Pact on Migration and Asylum and the Skills and Talent Package. These initiatives reveal an important shift in the perception of migration. Labour migration is no longer viewed exclusively as a matter of border control or social policy, but increasingly as an element of economic strategy and human capital management.

In addition to the Blue Card framework, several other directives regulate the position of third-country nationals within European labour markets. Directive (EU) 2016/801 facilitates the admission of students and researchers, thereby promoting educational mi-

gration and strengthening the links between higher education and labour market needs. Directive (EU) 2024/1233 establishes a single application procedure for a single permit and guarantees a common set of rights for legally residing workers from third countries. Seasonal workers are regulated by Directive 2014/36/EU, while Directive 2014/66/EU addresses the situation of intra-corporate transferees. Collectively, these instruments demonstrate the gradual emergence of a common European migration framework covering various categories of migrants.

The effective participation of migrants in labour markets also requires mechanisms facilitating the recognition of qualifications and the portability of social rights. Directive 2005/36/EC on the recognition of professional qualifications plays a crucial role in this regard. Although originally intended primarily for Union citizens, the recognition framework increasingly affects third-country nationals whose qualifications are validated within Member States. Likewise, Regulation (EC) No 883/2004 concerning the coordination of social security systems contributes to labour mobility by ensuring continuity of pension rights and social protection. These instruments facilitate the integration of migrants into national labour markets and enhance the flexibility of labour allocation within the European economy.

Despite these developments, European migration policy remains fragmented. Member States continue to apply different admission criteria, maintain varying salary thresholds and pursue distinct migration strategies. Germany increasingly emphasises selective immigration aimed at attracting highly qualified workers, whereas other countries continue to focus primarily on temporary or sector-specific migration. Consequently, the European Union has not yet developed a fully integrated labour migration system comparable to the freedom of movement enjoyed by Union citizens.

Nevertheless, the overall direction of legal development is unmistakable. The growing body of secondary legislation demonstrates that the European Union increasingly perceives migration from third countries as an instrument supporting the functioning of the internal market. Although third-country nationals do not possess the same rights as Union citizens, the legal framework governing their admission and mobility increasingly reflects the economic rationale underlying the free movement of workers. In this sense, the gradual construction of a European labour migration policy represents not a departure from the principles of European integration, but rather their adaptation to the demographic and economic realities of the twenty-first century.

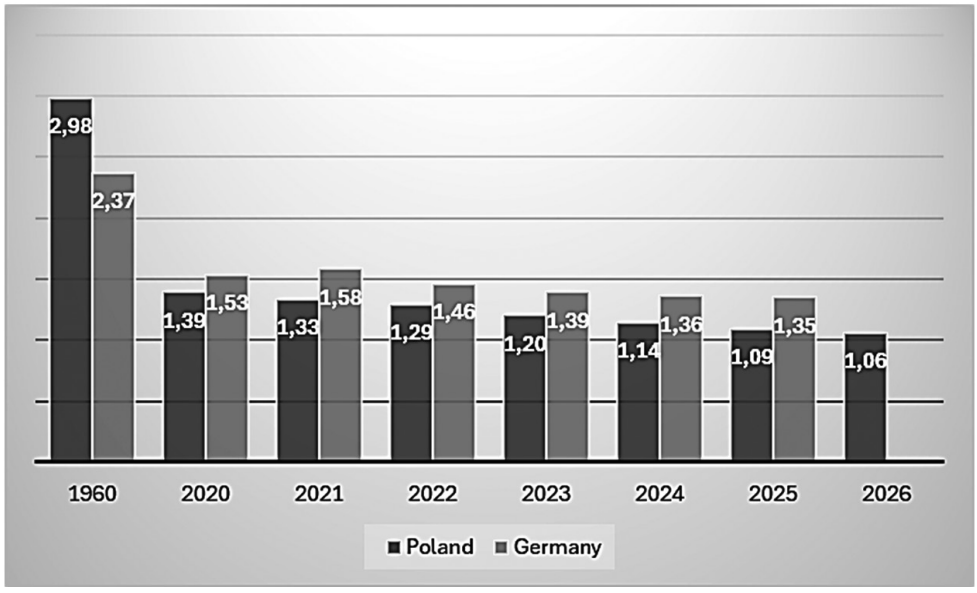
Demographic challenges and labour shortages in Poland and Germany

Demographic change constitutes one of the most important long-term challenges facing European economies. Declining fertility rates, rising life expectancy and the ageing of societies have significantly altered the structure of populations and increasingly affect the functioning of labour markets. While these processes are observable throughout the European Union, they are particularly evident in Germany and Poland. Although the two

countries differ considerably in their historical experiences and migration traditions, both face similar demographic constraints that increasingly threaten economic growth and the sustainability of social security systems.

For several decades, fertility rates in both countries have remained below the replacement level of 2.1 children per woman. This trend is not unique to Germany and Poland, but it reflects broader demographic developments occurring throughout Europe. Nevertheless, the decline has been particularly severe in Poland. In 1960 Polish women gave birth to nearly three children on average, while the corresponding figure for Germany exceeded two children. Since then, fertility rates have fallen dramatically in both countries. In recent years, Poland has recorded one of the lowest fertility rates in the world, while Germany, despite a temporary increase during the previous decade, also remains far below replacement level.

Figure 3: Fertility rate in Germany and Poland (children per woman).



Source: Own elaboration based on World Bank (2026), World Development Indicators, "Fertility rate, total (births per woman) https://data.worldbank.org/indicator/SP.DYN.TFRT.IN and GUS (2026) https://ssgk.stat.gov.pl/Ludnosc.html

These developments have been accompanied by profound changes in family structures and reproductive behaviour. Women increasingly postpone both marriage and childbirth. Longer periods of education, increased labour market participation, rising housing costs and changing social preferences have contributed to the postponement of family formation. As a result, the average age at first childbirth and first marriage has steadily increased.

Table 2: Mean age of women at the birth of their first child and at first marriage in Poland and Germany, 2024.

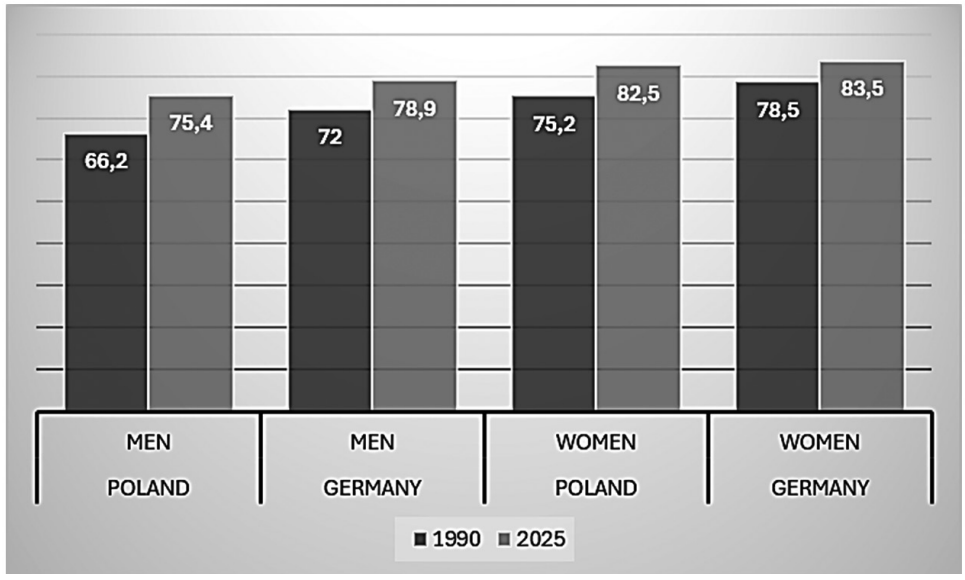
Country	Mean age of women at birth of first child	Mean age of women at first marriage
Poland	29.1	32.2
Germany	30.4	32.9

Source: Destatis (2026c), GUS (2025c).

Transformations have contributed to the ageing of societies. The median age of the population has risen considerably in both countries. In Poland, the median age increased from 32.3 years in 1990 to approximately 43.8 years in 2025 (GUS 2026). Similar trends are observed in Germany, where low fertility and increasing life expectancy have resulted in a growing proportion of elderly individuals (45 years as the average age of German citizens) and a declining share of the population of working age (Destatis 2026c).

Population ageing is further reinforced by increasing life expectancy. Improvements in healthcare, living standards and medical technologies have significantly extended average lifespans. Although this represents an important social achievement, it simultaneously increases pressure on pension systems and public finances.

Figure 4: Life expectancy in Poland and Germany.



Source: Destatis (2026b), GUS (2025b).

At the same time, family structures have become increasingly unstable. Rising divorce rates and declining marriage rates contribute to lower fertility and reinforce demographic

decline. Approximately 39% of marriages in Poland and around 37% in Germany eventually end in divorce. In Poland, the number of divorces exceeded the number of marriages in 2026, illustrating the profound social transformations affecting family life.

The consequences of these demographic developments extend far beyond population statistics. They directly affect the functioning of labour markets and the sustainability of welfare systems. A shrinking working-age population implies fewer taxpayers supporting an increasing number of pensioners. Consequently, pension systems become more vulnerable, healthcare expenditures rise, and economic growth becomes increasingly dependent on productivity gains and migration.

The labour shortages experienced by both countries illustrate these tendencies. Germany faces particularly severe deficits of skilled workers. According to various forecasts, the country could face a shortage of approximately 768,000 qualified workers by 2028. The scarcity of labour is already visible in numerous sectors, including healthcare, engineering, construction, information technology, transportation and manufacturing. These shortages threaten not only economic growth, but also the competitiveness of German industry and the sustainability of the welfare state (Burstedde, Tiedemann 2025: p. 10–26).

Poland experiences similar difficulties, although their nature differs somewhat. Rapid economic growth, low unemployment and large-scale emigration following accession to the European Union have contributed to labour shortages in manufacturing, logistics, construction, transport, agriculture and hospitality. As the domestic labour force continues to shrink, employers increasingly rely on foreign workers to maintain production capacities and sustain economic expansion.

The demographic crisis affects not only labour markets, but also the functioning of the European internal market. The traditional assumption that economic growth could be maintained through domestic labour resources has become increasingly unrealistic. In many sectors, labour shortages have become structural rather than cyclical phenomena. Consequently, migration is increasingly viewed not merely as a social issue, but as an essential instrument of economic policy.

These developments are particularly significant because they affect both countries simultaneously. Historically, Germany compensated for labour shortages through migration from Central and Eastern Europe, while Poland itself functioned as a reservoir of labour supply. However, Poland is now confronted with demographic decline similar to that observed in Germany. As a result, both countries increasingly compete for foreign workers rather than participate in a simple sender-receiver relationship. This transformation fundamentally alters the character of European labour markets and strengthens the importance of migration from third countries.

Under these circumstances, labour migration has become an indispensable component of economic development. Immigration no longer serves merely to alleviate temporary shortages but increasingly performs structural functions. It contributes to maintaining labour supply, supporting public finances and preserving the sustainability of social security systems. Consequently, migration policy has become closely intertwined with demographic policy and long-term economic strategy.

The demographic challenges facing Germany and Poland therefore provide an important context for understanding the growing significance of third-country nationals in the European labour market. While the free movement of workers remains one of the foundations of the internal market, demographic realities increasingly require complementary mechanisms. Labour migration from outside the European Union is emerging as one of the principal instruments, through which Member States seek to maintain economic competitiveness and mitigate the consequences of population ageing.

Labour migration policies in Germany and Poland: a comparative perspective

The growing demographic challenges facing European societies have transformed migration policy into an increasingly important component of economic policy. Germany and Poland provide particularly interesting examples because both countries experience labour shortages and population ageing, yet they have adopted substantially different approaches to labour migration. Germany has gradually developed a comprehensive and selective immigration model aimed at attracting highly qualified workers, whereas Poland has relied predominantly on geographically concentrated and demand-driven migration. Despite these differences, both countries increasingly depend on third-country nationals to sustain economic growth and mitigate the consequences of demographic decline.

Germany has traditionally been one of the principal destinations for migrants in Europe. Although for decades political discourse emphasised that Germany was not a country of immigration, the realities of economic development and demographic ageing gradually forced policymakers to adopt a more proactive approach. In recent years, migration policy has undergone a profound transformation. Rather than merely responding to migration flows, Germany increasingly seeks to manage labour supply actively through selective admission policies and instruments designed to attract human capital.

An important turning point was the adoption of the *Skilled Immigration Act* (germ. *Fachkräfteeinwanderungsgesetz*), which entered into force in 2020 and was subsequently expanded through the *Act on the Further Development of Skilled Immigration* (germ. *Gesetz zur Weiterentwicklung der Fachkräfteeinwanderung*) adopted in 2023 (see: Act 2019; Act 2023). These reforms reflected the growing recognition that migration policy should not merely address humanitarian concerns, but should also support economic development and enhance competitiveness. The German model increasingly focuses on attracting highly qualified workers, reducing administrative barriers and facilitating the transition from education to employment.

The importance of migration from third countries for the German labour market is illustrated by the increasing number of residence permits issued for employment purposes. At the end of 2022 approximately 455,500 third-country nationals held employment-related residence permits in Germany (Graf 2023: p. 4). This number increased to 540,600 in 2023 (Graf 2024b: p. 24) and reached approximately 588,200 in 2024 (Heß 2025: p. 5), demonstrating the growing significance of external migration as a source of labour supply.

The growing importance of foreign workers is also reflected in employment statistics. The number of third-country nationals employed and covered by social insurance in Germany increased steadily over recent years, rising from 2,598,301 in 2022 to 2,828,591 in 2023 and reaching 3,107,209 in 2024. This represents an increase of approximately 20% in only two years and demonstrates the rapidly growing contribution of workers from outside the European Union to the German labour market (Bundesagentur für Arbeit 2026).

Germany increasingly relies on highly qualified migration. The EU Blue Card constitutes one of the most important instruments supporting this strategy. Over the analysed period, the number of EU Blue Cards issued in Germany increased substantially, from 17,630 in 2016 to 69,353 in 2023. In 2024, the number declined to 56,252, but remained more than three times higher than in 2016. The importance of the EU Blue Card is also reflected in its share of all residence permits issued for employment purposes. In 2024, EU Blue Cards accounted for 72.9% of such permits, illustrating Germany's strong emphasis on attracting highly qualified third-country nationals, particularly specialists in information technology, engineering, healthcare and scientific research (Graf 2024b: p. 31).

Table 3: EU Blue Cards issued in Germany and their share of employment-related residence permits, 2016–2024.

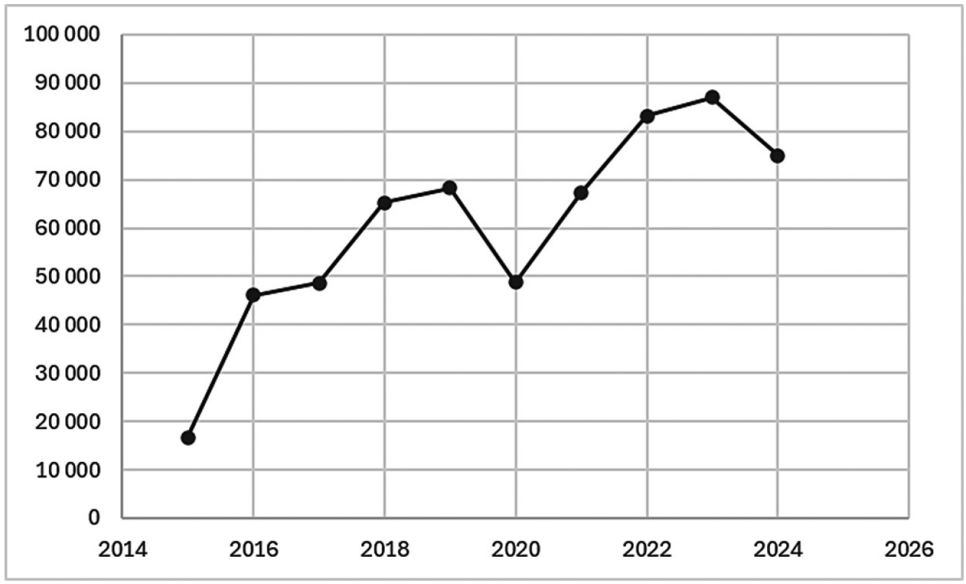
Year	EU Blue Cards issued	Share of all employment-related permits (%)
2016	17 630	44,6
2017	20 541	38,8
2018	26 995	39.5
2019	44 194	60,8
2020	43 227	84,7
2021	57 671	96,0
2022	63 242	65,3
2023	69 353	67,7
2024	56 252	72,9

Source: the author's calculation based on Eurostat data (2025a).

Educational migration represents another important pillar of German migration policy. The German authorities increasingly perceive international students not merely as temporary residents, but also as a potential source of future highly qualified labour. This approach is particularly important in the context of demographic ageing and persistent shortages of skilled workers, as international graduates of German educational institutions acquire qualifications and experience directly relevant to the domestic

labour market. The growing importance of educational migration is reflected in the number of permits to study issued to third-country nationals. As shown in the *Figure 5* below, their number increased from 16,683 in 2015 to 75,005 in 2024. Although the annual figures fluctuated, particularly during the COVID-19 pandemic, the long-term trend was strongly upward. The number of permits reached a peak of 86,943 in 2023 before declining to 75,005 in 2024 (Eurostat 2025b). Despite this decline, the number recorded in 2024 was approximately four and a half times higher than in 2015. These figures demonstrate the growing scale of study-related migration and indicate that third-country students constitute an increasingly important potential source of future highly qualified labour. Their transition from education to employment may contribute to the long-term accumulation of human capital and help alleviate shortages of qualified workers in Germany.

Figure 5: Permits to study issued to third-country nationals in Germany, 2015–2024.



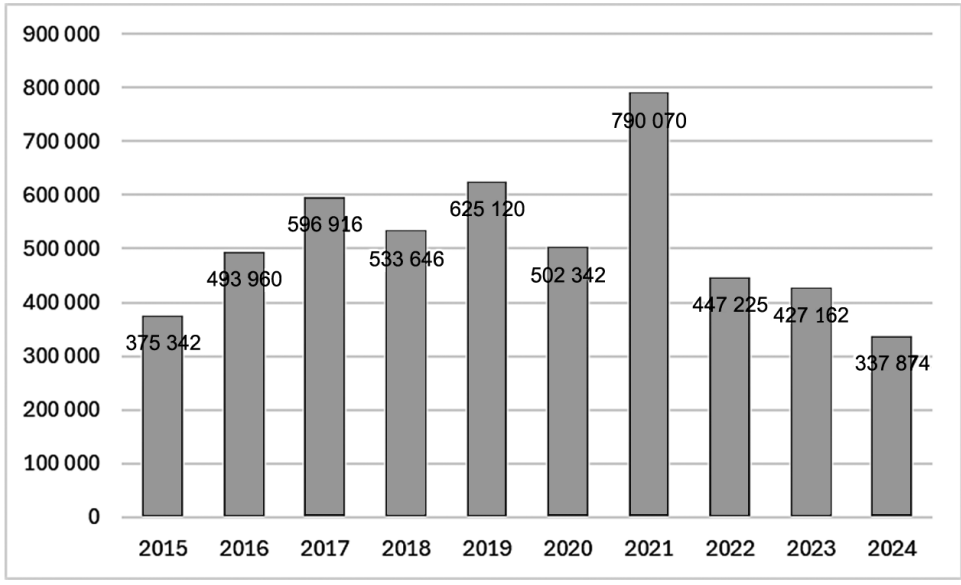
Source: the author's calculation based on Eurostat (2025b).

In addition to the EU Blue Card and educational migration, Germany has introduced several mechanisms designed to facilitate and diversify labour migration. The Opportunity Card (germ. *Chancenkarte*), introduced in 2024, established a points-based pathway enabling qualified individuals to enter Germany without a prior employment contract. Qualifications, professional experience, language skills and age constitute important selection criteria (Act 2008: sections 20a–20b). Germany has also developed migration partnerships with third countries and expanded the Western Balkans Regulation, thereby creating additional legal pathways for labour migration (Employment Regulation 2013:

section 26(2)). Taken together, these measures illustrate a broader transition from passive migration management to active labour supply management (Act 2008: sections 18, 20a–20b; Regulation 2013: section 26(2)).

Unlike Germany, Poland has only relatively recently transitioned from a predominantly emigration country to an important destination for labour immigration. Following its accession to the European Union in 2004, 2 millions of Polish citizens emigrated to Western Europe, particularly to Germany, the United Kingdom and Ireland (Balza 2025: p. 10). However, sustained economic growth, declining unemployment and growing labour shortages gradually increased demand for foreign workers and created conditions favourable to labour immigration. Consequently, Poland has become an important destination for foreign workers. This transformation is reflected in the growing number of work permits issued to third-country nationals. To provide a clearer picture of labour migration trends beyond the exceptional inflow from Ukraine, *Figure 6* presents the number of work permits issued to third-country nationals excluding Ukrainian citizens (Eurostat 2025b).

Figure 6: Work permits issued to third-country nationals in Poland, excluding Ukrainian citizens.



Source: Author's calculations based on Eurostat (2025b).

The Polish migration model differs substantially from the German approach. A large proportion of migrants originate from neighbouring and other geographically proximate countries, with Ukrainian citizens constituting by far the most important group. Geographical proximity, cultural similarities and relatively accessible administrative pathways facilitated large migration flows. The outbreak of the war in Ukraine in 2022 further ac-

celerated these processes and transformed Poland into one of the principal destinations for Ukrainian migrants.

Unlike Germany, Poland does not pursue a comparably selective migration policy aimed at attracting highly qualified workers. Labour immigration remains predominantly demand-driven and concentrated in sectors experiencing persistent labour shortages. Foreign workers are particularly visible in construction, manufacturing, logistics, transport, agriculture, hospitality and domestic services. Poland therefore relies predominantly on migrant workers employed in manual and lower-skilled occupations.

The demand-driven character of the Polish migration model is also reflected in the high approval rate for work-permit applications. In 2024, 84% of applications resulted in the issuance of a permit. Such a high approval rate is consistent with a system, in which applications are generally linked to a specific employer and an existing demand for labour. Rather than functioning primarily as a mechanism for selecting migrants according to their human-capital profile, the Polish system largely facilitates the recruitment of foreign workers to fill vacancies identified by employers.

The limited role of highly qualified migration is particularly evident in the use of the EU Blue Card. As shown in *Table 4*, despite an increase in the number of Blue Cards issued over the analysed period, they continued to account for only a marginal share of all employment-related permits, reaching just 1.37% in 2024. This contrasts sharply with Germany, where the corresponding share amounted to 72.9%, and illustrates the fundamentally different structure of labour migration in the two countries.

Table 4: EU Blue Cards issued in Poland and their share of all employment-related permits, 2016–2024.

Year	EU Blue Cards Issued	Share of all employment-related permits (%)
2016	673	0,17
2017	471	0,09
2018	1576	0,26
2019	2104	0,39
2020	2251	0,36
2021	2980	0,59
2022	4931	0,62
2023	7402	1,65
2024	5853	1,37

Source: the author's calculation based on Eurostat's data (Eurostat 2025a).

Recognising the growing importance of foreign labour, the Polish authorities have introduced legislative reforms aimed at simplifying access to the labour market. Recent

changes abolished the labour market test, accelerated administrative procedures and strengthened the digitalisation of the permit system. These reforms were intended primarily to reduce bureaucratic barriers and facilitate the employment of foreign workers. Nevertheless, the direction of these changes also reflects the predominantly demand-driven character of the Polish model: the principal objective has been to make it easier for employers to recruit workers rather than to create a comprehensive system for the strategic acquisition of highly qualified human capital.

The differences between Germany and Poland reveal two distinct approaches to labour migration policy. Germany increasingly treats migration as an instrument for acquiring human capital, addressing demographic challenges and enhancing long-term competitiveness. Its migration model is characterised by greater selectivity, long-term planning and active labour supply management. Poland, by contrast, continues to rely primarily on employer demand. Migration serves mainly as a mechanism for filling immediate labour shortages rather than as an instrument for the strategic attraction and retention of highly qualified workers.

Table 5: Comparison of migration models in Germany and Poland.

Dimension	Germany	Poland
Migration strategy	Selective and proactive	Demand-driven and reactive
Main objective	Acquisition of human capital	Compensation for labour shortages
Principal source countries	Global	Global
Role of EU Blue Card	High	Limited
Educational migration	Strongly promoted	Less significant
Migration partnerships	Developed	Limited
Points-based system	Opportunity Card	Absent
Dominant skill profile	Highly qualified workers	Low- and medium-skilled workers
Long-term strategy	Comprehensive	Fragmented

Source: the author's elaboration.

Despite these differences, both countries increasingly depend on labour migration to sustain economic growth and preserve the functioning of their welfare systems. In both cases, migration has evolved beyond its traditional role and has become an essential component of economic and demographic policy. Germany and Poland therefore illustrate two different paths leading to the same conclusion: under conditions of demographic decline and labour shortages, access of third-country nationals to the labour market is no longer a marginal issue, but a central element of economic governance and a necessary instrument supporting the functioning of the European internal market.

Discussion and conclusions

The analysis presented in this article demonstrates that the role of labour migration within the European Union has undergone a profound transformation. The original concept of the internal market was based on the assumption that the free movement of workers would ensure an efficient allocation of labour resources and enable the correction of imbalances between national labour markets. For decades, this mechanism contributed significantly to economic convergence and strengthened the functioning of the common market. The enlargements of the European Union to Central and Eastern Europe further increased the importance of labour mobility, with millions of workers relocating to Member States experiencing labour shortages. However, demographic developments have fundamentally altered the conditions, under which the European labour market operates.

Population ageing, declining fertility rates and shrinking working-age populations affect virtually all Member States simultaneously. Consequently, the traditional mechanism of labour mobility among Union citizens is increasingly unable to satisfy the growing demand for labour. Countries that historically supplied workers to Western Europe, including Poland, Romania, Bulgaria and Croatia, are themselves experiencing labour shortages and demographic decline. The decreasing migration surplus generated by intra-European mobility and the declining number of citizens from Central and Eastern Europe residing in Germany indicate that the demographic reserves, on which Western European economies previously relied are gradually becoming exhausted. These developments suggest that the original assumptions underlying the functioning of the internal market require adaptation to the demographic realities of the twenty-first century.

The legal framework developed by the European Union reflects this transformation. Although third-country nationals do not enjoy the same rights as Union citizens, the gradual expansion of secondary legislation demonstrates the emergence of a common labour migration policy. Instruments such as the EU Blue Card Directive, long-term resident status and directives regulating researchers, students and seasonal workers reveal that migration from outside the European Union is increasingly regarded as an element of economic governance rather than merely an issue of immigration control. The logic underpinning these instruments resembles the rationale behind the free movement of workers. Both mechanisms seek to facilitate the allocation of human resources, improve productivity and strengthen the competitiveness of the internal market.

The comparison between Germany and Poland demonstrates that Member States have adopted different approaches to achieving these objectives. Germany has gradually moved from passive migration management to a model of active labour supply management. Through the *Skilled Immigration Act*, the EU Blue Card system, the Opportunity Card and migration partnerships, Germany increasingly seeks to attract highly qualified workers and maximise human capital. Migration policy has become closely integrated with broader economic and demographic objectives. Rather than treating immigration as a temporary phenomenon, Germany increasingly regards it as a permanent instrument

supporting economic growth, industrial competitiveness and the sustainability of welfare state institutions.

Poland represents a different model. The country transformed from a state characterised by large-scale emigration into one of the principal destinations for labour migrants in Central Europe. Its migration policy remains predominantly reactive and responds primarily to immediate labour shortages. Immigration is heavily concentrated geographically and depends largely on workers originating from neighbouring countries, particularly Ukraine and Belarus. Although legislative reforms have simplified access to the labour market, Poland still lacks a comprehensive strategy aimed at attracting highly qualified workers and integrating migration policy into long-term demographic and economic planning. Nevertheless, foreign labour has become indispensable for maintaining production capacities and sustaining economic growth.

Despite these differences, the experiences of both countries lead to similar conclusions. Immigration from third countries is no longer a supplementary phenomenon, but an essential component of economic development. It contributes to maintaining labour supply, supports public finances and alleviates the pressures created by ageing populations. In this respect, labour migration performs not only economic functions, but also demographic and fiscal functions. Without immigration, the sustainability of pension systems, healthcare systems and welfare institutions would become increasingly difficult to maintain.

The findings of this study support the central hypothesis that access of third-country nationals to the labour market has evolved into an instrument for achieving the objectives of the internal market. Labour migration from outside the European Union should therefore not be perceived as an alternative to the free movement of workers, but rather as a continuation of the original principles underlying European integration. Articles 45–48 TFEU were intended to ensure the efficient allocation of labour resources and promote economic prosperity. In the demographic conditions of the twenty-first century, these objectives can no longer be achieved solely through the mobility of Union citizens. The admission of third-country nationals increasingly represents a second stage of labour market integration, complementing rather than replacing the traditional freedoms of the internal market.

This transformation has important implications for the future development of the European Union. The ability to attract, retain and effectively integrate foreign workers is likely to become one of the principal determinants of economic competitiveness. Member States will increasingly compete for talent on a global scale, while selective migration policies will become more closely linked with industrial policy, innovation policy and demographic strategy. At the same time, the growing importance of third-country nationals raises important legal and political questions concerning their integration, rights and mobility within the Union. Future reforms of European migration policy may therefore gradually extend forms of mobility and equal treatment that have traditionally been reserved for Union citizens.

Ultimately, the demographic challenges confronting Europe suggest that labour migration should no longer be viewed exclusively through the lens of immigration control

or social policy. Instead, it should be recognised as an essential instrument of economic governance and a necessary condition for preserving the competitiveness and long-term sustainability of the European social model. In this sense, access of third-country nationals to the labour market has become not merely an issue of migration policy, but one of the central mechanisms supporting the functioning and future development of the European internal market.

The findings of this study should be interpreted with appropriate caution. Labour migration from third countries cannot by itself resolve the structural challenges resulting from population ageing and shrinking labour forces. Long-term sustainability of European labour markets will also depend on technological progress, improvements in labour productivity, greater labour market participation among older workers and family policies supporting higher fertility. Nevertheless, the comparative analysis demonstrates that migration policy has become an increasingly important component of broader economic governance and constitutes one of the principal instruments available to Member States for mitigating labour shortages within the framework of the internal market.

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Received: 31.07.2026. Accepted: 20.08.2026.