

## UNHCR recommendations to Finland on strengthening refugee protection in Finland, Europe and globally

April 2023

This document sets out a number of recommendations which the Representation for the Nordic and Baltic countries of the United Nations High Commissioner for Refugees (UNHCR) has developed with a view to further strengthening refugee protection in Finland, as well as to Finland's engagement in European and international fora where issues of refugee protection and asylum are being discussed. The recommendations are addressed to the Finnish Government, parliamentarians and all other relevant institutional actors and stakeholders. They aim at contributing to constructive discussions on improvements of the protection and integration systems for refugees at the national, regional and international level.

UNHCR offers these recommendations as the agency entrusted by the UN General Assembly with the mandate to provide international protection to refugees and, together with Governments, seek permanent solutions for refugees.<sup>1</sup> UNHCR is responsible for supervising the application of the 1951 Convention relating to the Status of Refugees – to which Finland is a party since 1954. UNHCR thus has a direct interest in policy discussions and legislative initiatives in the field of asylum.

### 1. Introduction

Finland has made outstanding contributions to international refugee protection over the past decades, including through a well-established asylum and reception system, a long-standing commitment to refugee resettlement and comprehensive integration efforts. Within the EU, Finland is a strong voice for greater solidarity and responsibility sharing and for fair EU asylum policies and practices in line with international standards to ensure that refugees receive the protection they deserve. Globally, Finland has placed the protection of the forcibly displaced at the top of the international political agenda and particularly championed the empowerment and protection of persons with disabilities.

UNHCR is grateful for Finland's long-standing commitment and contribution to upholding international refugee protection, supporting multilateralism and demonstrating humanitarian leadership. Finland is a very important strategic partner and UNHCR is Finland's biggest recipient of multilateral aid, which in turn enables UNHCR to address critical humanitarian needs of the most vulnerable refugee populations.

### 2. Strengthening protection and integration policies in Finland

The Government of Finland has in the past years introduced several legislative reforms in the area of asylum and family reunification. Several legislative changes to the Aliens Act were introduced in 2015-2019 which reduced the legal protection of asylum-seekers and refugees in Finland.<sup>2</sup> UNHCR welcomes the recent roll-back of some of these restrictions, in particular the reintroduction of legal aid at the first instance asylum procedure and the removal of the maintenance requirement for children in Finland acting as sponsors of the reunification with their family members.

<sup>1</sup> UN General Assembly, UNHCR Statute, 14 December 1950, [www.refworld.org/docid/3ae6b3628.html](http://www.refworld.org/docid/3ae6b3628.html), para. 1.

<sup>2</sup> Finnish Government, Kansallinen Lapsistrategia, March 2021, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162864/VN\\_2021\\_8.pdf?sequence=4&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162864/VN_2021_8.pdf?sequence=4&isAllowed=y).

Finland has responded in a swift and protection-oriented way to the unprecedented refugee situation arising as a result of the war in Ukraine. Finland quickly scaled up its reception capacity and started processing a large number of temporary protection applications in connection with the activation of the EU Temporary Protection Directive (TPD) in early 2022.<sup>3</sup> Finland's response to people fleeing war in Ukraine has been positive. UNHCR particularly commends Finland for managing a flexible and adaptable reception system and the comprehensive coordination among relevant ministries and other actors. UNHCR also appreciates Finland's efforts to shift from a short-term to a mid to long-term response. For instance, as of March 2023, refugees from Ukraine who have been granted temporary protection and lived in Finland for one year can apply for a "municipality of residence" which means they are entitled to the same rights as those residing in Finland permanently.

### **2.1. Access to territory and to seek asylum**

Finland has a long tradition of upholding the fundamental human right to seek and enjoy asylum. Recently, Finland has proposed measures to strengthen its border security, including the possibility to channel asylum-seekers to designated border points in exceptional situations and a proposal to use border procedures for rapid processing of asylum applications immediately at or near Finland's border in situations of mass influx and instrumentalization of migration.<sup>4</sup>

Going forward, UNHCR recommends Finland to ensure that effective access to territory and respect for the principle of non-refoulement<sup>5</sup> are fully maintained also in practice and in all circumstances, including in exceptional situations. UNHCR firmly believes that upholding an asylum system in line with international and European law can be achieved in conjunction with managing safe borders and that the two are not mutually exclusive. While States have a sovereign right to regulate the entry of non-nationals, international law also provides for the universal and fundamental right to seek and enjoy asylum. Effective access to territory is an essential pre-condition to effectively exercise this right. States' non-refoulement obligations are absolute and cannot be deviated from, even in times of emergency or in situations of instrumentalization.<sup>6</sup> A State presented with an asylum request at its borders is required to provide admission at least on a temporary basis to examine the claim, as the right to seek asylum and the non-refoulement principle would otherwise become meaningless.

Should Finland proceed with the introduction of border procedures, UNHCR recommends exempting unaccompanied and separated children from these procedures as their needs and rights cannot be met in such circumstances. For children arriving with their families or another adult caretaker, special safeguards need to be in place, including an individual assessment as to their specific needs and whether border procedures are appropriate for them.

<sup>3</sup> EU, Council of the European Union, Council Directive 20 01/55/EC of 20 July 2001 on Minimum Standards for Giving Temporary Protection in the Event of a Mass Influx of Displaced Persons and on Measures Promoting a Balance of Efforts Between Member States in Receiving such Persons and Bearing the Consequences Thereof, 7 August 2001 <https://www.refworld.org/docid/3ddcee2e4.html>.

<sup>4</sup> The Finnish Border Guard Act and the Emergency Powers Act were amended in July 2022. A proposal to introduce border procedures was presented in June 2022, but has not yet been adopted. See, Government of Finland, Ministry of Interior, Amendments to Border Guard Act help prepare for incidents, 8 July 2022 <https://valtioneuvosto.fi/en/-/1410869/amendments-to-border-guard-act-help-prepare-for-incidents>; Border procedure could be introduced at the Finnish border in situations of mass influx of migrants or instrumentalization of migration, 22 June 2022 <https://valtioneuvosto.fi/en/-/1410869/border-procedure-could-be-introduced-at-the-finnish-border-in-situations-of-mass-influx-of-migrants-or-instrumentalisation-of-migration>. Finland has also started building a barbed-wire fence at its eastern border.

<sup>5</sup> The principle of non-refoulement is contained, for instance, in Article 33 of the 1951 Convention. The principle of non-refoulement prohibits States from transferring or removing individuals from their jurisdiction or effective control when there are substantial grounds for believing that the person would be at risk of irreparable harm upon return, including persecution, torture, ill-treatment or other serious human rights violations. Even general defenses under international law, such as, force majeure, necessity and distress will not allow States to restrict, limit, derogate or circumvent their non-refoulement obligations.

<sup>6</sup> UNHCR's Recommendations for the Swedish and Spanish Presidencies of the Council of the EU, January 2023 <https://www.refworld.org/docid/63bd99904.html>, page 8.

## 2.2. Quality of asylum and reception system

Finland has a well-established and high-quality asylum and reception system, which guarantees asylum-seekers the right to have their application processed individually in a fair and efficient asylum procedure. The commitment of the Finnish Immigration Service (MIGRI) to continuously improve capacity and quality of the reception and asylum procedures serves as a good practice in the Nordic region and beyond. UNHCR welcomes MIGRI's continuous investments in making the asylum procedures fair and efficient, such as the various quality initiatives carried out over the years.

UNHCR considers that predictable core funding towards the first and second instance asylum procedures, even at times of decreasing numbers of applications, are essential to ensure the overall quality and timeliness of asylum decisions, which may also reduce the number of appeals. This would in turn reduce the cost of reception conditions, thus saving resources and produce more efficient and fairer decisions for asylum-seekers. UNHCR stands ready to continue providing support to MIGRI and the Administrative Courts in their efforts to ensure a high-quality asylum system and in fulfilling Finland's international obligations.

UNHCR takes note of the planned reform of the Finnish asylum system, including a comprehensive review of the Finnish Aliens Act. UNHCR stands ready to support the government in this endeavor and looks forward to a consultative and inclusive process that draws on the experiences and voices of civil society as well as asylum-seekers and refugees themselves.

## 2.3. Child protection

Finland has in the past years received a significant number of unaccompanied and separated children.<sup>7</sup> UNHCR acknowledges that the reception of these children, due to their specific vulnerabilities, protection needs and rights, presents a number of challenges. UNHCR appreciates the robust child protection system developed by Finland over the years to respond to the needs and well-being of asylum-seeking and refugee children, including the strengthening of the legal protection of unaccompanied and separated children.

UNHCR recommends that similar improvements be made for the protection of children arriving with their family members to better meet their specific needs in decision-making processes. UNHCR would also recommend undertaking an assessment of the particular impact on children of the introduction of restrictions to Finnish law and policy in recent years as an integral way to promote the rights of the child.

UNHCR further welcomes the adoption of the National Child Strategy in 2021, which aims to strengthen the child's right to inclusion in decision-making and activities concerning children.<sup>8</sup> As the Strategy, at present, does not make a specific reference to children with international protection needs, UNHCR recommends that it be updated to refer for instance to asylum-seeking children and children at risk of statelessness. This would be vital for the success of the Strategy as a whole.

The principle of the best interests of the child has not always been fully applied in the area of asylum and family reunification.<sup>9</sup> In UNHCR's review of child asylum claims in Finland in 2021-2022, UNHCR recommended that considerations concerning the child's best interests should be clearly set out in all asylum decisions involving children. UNHCR also recommended ensuring that children are always heard,

<sup>7</sup> A total of 4,225 unaccompanied children sought asylum in Finland in the period January 2015 - February 2023. In addition, 73 unaccompanied children have applied for temporary protection since February 2022 <https://statistik.migri.fi/#applications>.

<sup>8</sup> National Child Strategy, Publications of the Finnish Government, 2021:8 (version in Finnish)  
<https://julkaisut.valtioneuvosto.fi/handle/10024/162864>

<sup>9</sup> See, for instance, Family Reunification Practices in Finland, A report by the Finnish Refugee Advice Centre, 15 March 2021 <https://www.unhcr.org/neu/53809-new-study-points-to-challenges-in-accessing-family-reunification-in-finland.html>; Non-Discrimination Ombudsman, Finland, Children without families - Family Reunification of under-age beneficiaries of international protection, 2 March 2020. See also, Committee on the Rights of the Child, A.B v. Finland (CRC/C/86/D/51/2018), 5 February 2021

also when a child applies for asylum with adult caregivers. UNHCR appreciates that MIGRI now more systematically hears younger children. Additionally, UNHCR recommended that decision-makers specialised in interviewing children should be available in all MIGRI offices.

UNHCR welcomes the amendment of the Aliens Act in 2015, prohibiting the detention of unaccompanied children under the age of 15 years. UNHCR is concerned, however, that the detention of children over 15 years of age in Finland continues.<sup>10</sup> In UNHCR's view, detention is never in the best interests of a child and cannot be justified solely on the basis of the child's migration or residence status. UNHCR therefore strongly urges Finland to actively explore alternatives to detention, preferably through family-based care options, community-based options or other suitable care arrangements as determined by the competent childcare authorities. UNHCR also urges Finland to release regular and accurate data on the detention of children on the basis of their migration status.

### 2.3. Family reunification

The right to family life is a fundamental human right. UNHCR strongly believes that supported and well-managed access to family reunion enables many women and children to safely access protection. Effective and prompt family reunification procedures help discourage communities from using criminal smuggling networks, remove the risk of undertaking dangerous journeys, and ensure more gender equity in terms of access to protection. It is well known that the urge to reunite with family members is a key driver of irregular onward movements. Family reunion is also a strong element in support of successful integration strategies and programs, as well as an important factor in reducing mental health issues among refugees. Research shows that there is a direct link between family reunification, mental health and successful integration.<sup>11</sup>

In Finland, in recent years, the right to family reunification, both for refugees and beneficiaries of subsidiary protection, has become severely restricted through numerous legal, practical and financial obstacles.<sup>12</sup> UNHCR regrets that the family reunification mechanism, as a legal pathway, has been curtailed to such an extent.

UNHCR is concerned that Finland's current legislation practically excludes beneficiaries of subsidiary protection from family reunification by conditioning it to strict income requirements from day one. While UNHCR acknowledges that EU legislation does not oblige States to grant beneficiaries of subsidiary protection the same rights, UNHCR would like to urge Finland to grant 1951 Convention refugees and beneficiaries of subsidiary protection equal access to effective family reunification. These two categories have the same protection needs, face the same integration opportunities and challenges, and also share similar return prospects. UNHCR therefore recommends that Finland only impose income requirements for persons with subsidiary protection status if the application is filed after three months, as is the case for refugees and that the income requirements are not so high that they in effect present a barrier to family reunification for most refugees.

UNHCR also recommends Finland to remove the many practical obstacles to family reunification, including high application fees, lack of access to visa-issuing Finnish Embassies, and the requirement of legal stay in the country where the application is being filed.

<sup>10</sup> Children of all ages can be detained for a maximum of 12 months when they are with a parent. Unaccompanied children between ages 15-17 can be detained for a maximum of six days.

<sup>11</sup> See, for example, Finnish institute for health and welfare, <https://thl.fi/en/web/migration-and-cultural-diversity/integration-and-inclusion/family-reunification>.

<sup>12</sup> Family Reunification Practices in Finland, A report by the Finnish Refugee Advice Centre, 15 March 2021, [New study points to challenges in accessing family reunification in Finland – UNHCR Northern Europe](#).

## 2.4. Integration

Fostering sustainable integration at the local level through social cohesion and equal opportunities is a key objective of the Global Compact on Refugees (GCR, see further below at 4.1). Integration requires appropriate investments of time and resources from States, local authorities, the private sector and civil society that have a key role to play in supporting integration, in addition to the efforts required from refugees in facilitating their integration. Additionally, joint efforts and an increased focus on countering growing intolerance and xenophobia are particularly relevant for asylum-seekers and refugees.

Building social cohesion, stability and security requires that communities are well-equipped to receive refugees, and that refugees are well-supported to realize their potential in their new environments. Integration systems can be supported by a number of elements, including by increased funding for integration programmes; predictable, harmonized services; and engaging communities, refugees and civil society actors in fostering welcoming communities with a holistic approach.

The importance of effective integration has been underlined by all political parties in Finland as a crucial area of focus. UNHCR recommends Finland to continue its work to ensure even more effective integration measures, for example, by equipping all regions and municipalities to welcome refugees in an equal and sufficiently resourced manner.<sup>13</sup>

## 2.5. Situation of stateless persons

Statelessness in Finland mainly occurs in the migratory context. The stateless population largely consists of migrants, asylum-seekers, refugees and persons of "unknown nationality".<sup>14</sup>

UNHCR commends Finland for having brought its Citizenship Act into full compliance with the 1961 Convention on the Reduction of Statelessness (the 1961 Convention) and for permitting children born in Finland who would be otherwise stateless to automatically acquire Finnish nationality. UNHCR also welcomes the legislative reform process initiated in 2020 and the intention to remove the distinction between voluntary and involuntary statelessness, the proposed improvements to the determination of citizenship status and the elimination of gender-based discrimination. UNHCR recommends developing the existing procedure into a dedicated Statelessness Determination Procedure to better identify and protect stateless persons in Finland.<sup>15</sup>

While a definition of a stateless person has been incorporated into the Finnish Nationality Law, UNHCR recommends the insertion of "under the operation of its law" in the definition for it to be fully aligned with the 1954 Convention relating to the Status of Stateless Persons. This addition is important as it makes clear that it is necessary to not only look at the laws of a country but also how they are implemented in practice when determining whether someone is a stateless person.

The current standard of proof for people to establish their statelessness is quite high in Finland. As a result, many are recorded as having "unknown nationality" rather than as stateless, although there are strong indicators of statelessness. UNHCR thus recommends using the category "unknown nationality" with caution and limiting its use as far as possible. This will help avoid gaps in the identification of statelessness and ensure that stateless persons can enjoy the rights to which they are entitled. UNHCR also recommends undertaking an analysis of the circumstances behind the high number of children with no nationality, in particular young children.

<sup>13</sup> The reform of the Finnish Integration Act with the main aim to speed up integration and employment of immigrants, increase equality and wellbeing by an advancement of good relations between population groups.

<sup>14</sup> By the end of 2021, Finland had a stateless population of 3,109 individuals, many of whom were born in Estonia, Syria, the former Soviet Union and Iraq.

<sup>15</sup> UNHCR, Observations on the "Proposed Amendments to the Finnish Citizenship Act", 12 November 2021

<https://www.refworld.org/docid/618e7c034.html>, paras. 15-17; UNHCR, Mapping Statelessness in Finland, November 2014 <https://www.refworld.org/docid/546da8744.html>, pp. 44-43, 56.

Birth registration is the foundation for establishing a child's identity and without such registration a child is at risk of statelessness. However, the birth registration of children born to undocumented migrants in Finland may be left incomplete, for instance, without the name of the child. UNHCR recommends that the gaps and challenges in birth registration are identified and addressed to preserve the child's right to an identity and name.

Many stateless people in Finland have been legally residing in the country for more than 10 years and even up to 25 years. UNHCR thus advocates for finding a durable solution for stateless people through naturalization. To end statelessness, additional measures are needed to facilitate the acquisition of nationality, such as less stringent language requirements and reduction of fees.<sup>16</sup>

Upon becoming a State party to the 1954 Convention relating to the Status of Stateless Persons, Finland made several reservations to the Convention that may now have become outdated and obsolete due to subsequent developments in Finnish legislation and policies. UNHCR recommends Finland to withdraw these reservations to ensure full compliance with the 1954 Convention.

**For improved protection and integration of refugees and stateless persons, UNHCR recommends Finland to:**

1. Ensure that effective access to territory and asylum procedures are fully maintained both in law and in practice and in all circumstances, including emergency situations.
2. Guarantee the right of children to apply for international protection in all circumstances and that the rights of the child are protected throughout the asylum process, including when they are near or at the borders.
3. Ensure the quality and efficiency of the Finnish asylum procedure, including by safeguarding the resources of the Finnish Immigration Service and the Administrative Courts, and continued commitment to quality decision-making.
4. Make similar improvements for the protection of children arriving with their family members to better meet their specific needs in decision-making processes as those already made for unaccompanied children and ensure that the principle of the best interests of the child is a primary consideration in all decisions affecting the child.
5. Abstain from detaining children solely because of their migration status and to revise the law to this end.
6. Provide equal access to family reunification for refugees and beneficiaries of subsidiary protection and reduce or remove the maintenance requirements as well as other practical and financial barriers which hinder family reunification for refugee families who are otherwise eligible.
7. Continue working towards an effective integration system and equip all regions and municipalities to welcome refugees in an equal and sufficiently resourced manner.
8. Introduce a dedicated statelessness determination procedure and a definition of a stateless person that is fully aligned with the 1954 Convention relating to the Status of Stateless Persons.

### **3. Finnish engagement in strengthening the EU refugee protection regime**

UNHCR recognizes the Finnish Government's strong voice within the EU, advocating for greater solidarity and a joint and fair EU solution to the situation of refugees arriving in Europe. UNHCR commends the Government's efforts to ensure that the reform of the Common European Asylum System (CEAS) is based on international standards and a more equal distribution of refugees. UNHCR encourages

<sup>16</sup> For updates on the #IBelong Campaign to end statelessness by 2024, see <https://www.unhcr.org/ibelong/>.

Finland to continue to use its standing as a global advocate for human rights, democracy and solutions to continue focusing on promoting and building a coordinated European response and a unified European asylum and migration policy.

From the onset of the Ukraine refugee situation, Finland and other EU Member States have demonstrated remarkable solidarity with a unanimous decision to activate the TPD, providing protection, access to rights and assistance to millions of people. The response to the Ukraine refugee situation has highlighted Europe's capacity for an organized and workable approach to asylum – one that benefits states and safeguards the rights of refugees.

The legislative cycle at EU level and the European Commission's Pact on Migration and Asylum<sup>17</sup> have provided opportunities to forge common ground among Member States on evolving issues of asylum and migration, in line with the GCR<sup>18</sup> and the Global Compact for Migration.<sup>19</sup> It is vital that the reform to secure key improvements to the EU asylum rules remains high on the political agenda.<sup>20</sup>

UNHCR considers that a comprehensive approach to addressing the internal and external aspects of asylum and migration policies would be the most effective, sustainable and humanitarian way of reaching an agreement among Member States on the reform of the CEAS. UNHCR appreciates that Finland takes part in solidarity mechanisms amongst EU Member States in order to ensure greater responsibility-sharing for asylum-seekers, and ultimately better protection for people fleeing war, violence and persecution. UNHCR particularly appreciates Finland's relocation of unaccompanied and separated children from the Mediterranean region as a strong and important measure of solidarity and European responsibility-sharing. UNHCR welcomes the flexible selection criteria ensuring that the most vulnerable children can benefit from the program.

As an assessment done by Save the Children Finland and UNHCR in 2022 shows, the Finnish process has clearly taken into account the specific vulnerabilities of children, which can serve as a good practice and inspiration to others.<sup>21</sup> The recommendations of the assessment study include, for example, to ensure timely and adequate information in child-friendly language prior to relocations as well as strengthening the prioritization of language learning quickly after relocation. UNHCR would further like to commend Finland's renewed commitment to the relocation of children as demonstrated by the Government's announcement in December 2022 to receive another 175 vulnerable asylum-seekers from the Mediterranean region with priority to be given to vulnerable people, including unaccompanied and separated children. Based on these positive experiences, UNHCR recommends to Finland to actively contribute to the EU asylum policy regarding children on the move and the protection of their rights.

Internal EU solidarity must be accompanied by continued access for people to the EU's asylum procedures, rather than shifting protection responsibilities and externalizing asylum processing to non-EU countries. UNHCR therefore encourages Finland to lead by example by ensuring access to its own territory as well as effective access to EU territory, fair and effective asylum procedures and to provide swift access to safety for those in need of international protection, including finding a long-term predictable solution for disembarkation arrangements as well as ensuring timely returns for those who are not in need of international protection.

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<sup>17</sup> UNHCR, Recommendations for the European Commission's Proposed Pact on Migration and Asylum, January 2020, <https://www.refworld.org/docid/5e3171364.html>.

<sup>18</sup> <https://www.unhcr.org/ph/the-global-compact-on-refugees>.

<sup>19</sup> <https://www.iom.int/global-compact-migration>.

<sup>20</sup> For further information on the UNHCR roadmap for an EU that better protects refugees, see UNHCR's Recommendations for the Swedish and Spanish Presidencies of the Council of the European Union (EU), January 2023 <https://www.refworld.org/docid/63bd99904.html>.

<sup>21</sup> Save the Children, Finland and UNHCR, A Participatory Assessment with Relocated Unaccompanied Children in Finland, Report on Initial Outcomes of Relocation of Unaccompanied Children from Greece to Finland, September 2022 <https://www.unhcr.org/neu/87081-new-report-from-unhcr-and-save-the-children-finlands-earlier-relocation-of-asylum-seeking-children-from-greece-showcased-good-and-child-friendly-practices.html>.

Further, in the spirit of the GCR, UNHCR encourages Finland to continue to promote EU's external engagement, including in its neighboring regions, via expansion of the protection space globally, a strong commitment to resettlement and complementary pathways as well as increased support to countries outside of the EU.

To contribute to an effective EU protection regime, UNHCR recommends Finland to:

1. Continue to actively support the development of a Common European Asylum System, based on international protection standards and practices, including access to protection in the EU.
2. Continue to participate in effective mechanisms to facilitate greater EU solidarity and responsibility-sharing to support EU Member States receiving a disproportionate number of asylum claims.
3. Support the development of a safe and predictable disembarkation mechanism in relation to the Mediterranean Sea and processing of persons rescued at sea.
4. Actively contribute to the EU asylum policy regarding children on the move and the protection of their rights, based on the positive experiences with relocation of children to Finland.

#### **4. Finland's engagement in strengthening the global commitment for the protection of refugees**

In the past decade, global forced displacement has increased in scale and complexity. In 2022, the total forced displacement exceeded 100 million people, which is more than double the level ten years ago. Contrary to what is often portrayed, the majority of people forced to flee their homes stay in their own country or flee to the immediate neighboring country. Low and middle-income countries are hosting 83 per cent of the world's refugees, with the least developed countries providing asylum for one-third of the global total.

While fewer people are crossing the sea borders to Europe, too many still tragically lose their lives at sea trying to reach safety. Pushbacks and abuses at land borders also continue, meaning many people cannot access Europe to seek protection. Meanwhile, the world's response to large-scale movements remains inadequate and underfunded leaving many refugees with a very uncertain future.

##### **4.1. The Global Compact on Refugees**

The GCR recognizes the need for strengthened burden- and responsibility-sharing in the context of forced displacement and for more complementarity between the approaches of humanitarian, development and peace-building actors. The GCR, adopted in December 2018, although not legally binding, guides the international community as a whole in supporting refugees as well as countries and communities hosting large numbers of refugees through the mobilization of political will and a broadening of the base of support.

Finland has played a crucial role in its political support and active engagement throughout the whole process of the New York Declaration, the Comprehensive Refugee Response Framework and the GCR. UNHCR appreciates that Finland has been promoting a rights-based approach, a whole of government response, a positive refugee narrative, addressing root causes, the humanitarian-development nexus, the role of education and private sector in strengthening the self-reliance of refugees.

The GCR mandates the organization of a Global Refugee Forum every four years, as the main vehicle for follow-up and implementation of the GCR. The first Forum was convened in December 2019 and indicated a strong international commitment to come together to work in the spirit of the UN's 2030

Agenda for Sustainable Development and help refugees and their hosts to live lives in dignity. UNHCR encourages Finland to continue promoting and supporting the effective implementation of the GCR, including through making pledges and contributions at the domestic and global level to the upcoming Global Refugee Forum in December 2023.<sup>22</sup>

Every two years between Forums, a High-Level Officials Meeting is convened to take stock of progress and maintain momentum towards the objectives of the GCR.<sup>23</sup> The first meeting took place in 2021 to shape the substance and implementation of both ongoing and future pledges, support, partnerships, and initiatives. UNHCR is grateful for Finland's steadfast commitment to the GCR as expressed during the meeting and for its contributions that help translate the GCR into concrete improvements in the lives of refugees and the communities that host them.

#### 4.2. Resettlement and Complementary Pathways

As opportunities for voluntary repatriation and local integration of refugees in the current global landscape are increasingly limited, resettlement becomes an even more important tool for protection and for finding solutions for some of the world's most vulnerable refugees. Intensified international efforts are critical to address the shortage of resettlement opportunities.<sup>24</sup>

As part of the GCR, UNHCR, States and partners in 2019 adopted a global three-year strategy on Resettlement and Complementary Pathways, with a roadmap presenting the next phase of the strategy launched in 2022.<sup>25</sup> Finland and other States can demonstrate their commitment to global solidarity and responsibility-sharing with States hosting large numbers of refugees by expanding resettlement programs and the range of legal pathways for refugees, which will also help to combat the business model of human smuggling and trafficking networks.

UNHCR has a long-standing partnership with Finland on resettlement. Thousands of refugees, including many women and children, have been able to find safety and rebuild their lives through the Finnish resettlement programme. Finland increased its commitment to receive 1,500 resettled refugees in 2022 (mainly due to the situation in Afghanistan) compared to 1,050 in 2021 and 2023. Finland also maintains a Priority Global Quota of 130 places for emergency and urgent cases world-wide.<sup>26</sup>

Complementary pathways have been a priority area for the Finnish Government in recent years and UNHCR appreciates that a study, commissioned by the Government and published in November 2021, has paved the way for more concrete discussions on possible labor and education pathway pilot programmes in Finland.<sup>27</sup> UNHCR is also excited to see that community sponsorship programmes are taking off in Finland in 2023 as a way to strengthen the integration of resettled refugees and to explore models that are suitable for the Finnish context.

UNHCR recommends Finland to further expand the number of resettlement places to better meet the increasing global needs and to continue to advance complementary pathways for refugees by further developing education and labor pathways. UNHCR looks forward to sustained cooperation with Finland in working together to find solutions for refugees both in Europe and globally. UNHCR also welcomes

<sup>22</sup> UNHCR - Global Refugee Forum 2023. For further information about the Global Compact on Refugees, including pledges and contributions, see <https://globalcompactrefugees.org/index.php/>.

<sup>23</sup> High-Level Officials Meeting, Reflecting on progress and charting the future, <https://www.unhcr.org/high-level-officials-meeting.html>.

<sup>24</sup> In 2023, UNHCR estimates that global resettlement needs will significantly increase to over 2 million persons. UNHCR, Projected Global Resettlement Needs 2023, [UNHCR - Projected Global Resettlement Needs 2023](#). In 2022, 58,457 refugees departed on resettlement. For further statistics, see [UNHCR - Resettlement Data](#).

<sup>25</sup> UNHCR, The Three-Year Strategy (2019-2021) on Resettlement and Complementary Pathways, June 2019, <https://www.unhcr.org/5d15db254.pdf>; UNHCR, The [Third Country Solutions for Refugees: Roadmap 2030](#), June 2022.

<sup>26</sup> [Quota refugees | Maahanmuuttovirasto \(migri.fi\)](#).

<sup>27</sup> Study: Complementary migration pathways are a way to combine humanitarian and skills-based immigration ([valtioneuvosto.fi](https://www.valtioneuvosto.fi))

the proposed introduction in Finland of a humanitarian visa system for international crisis situations as a way to create safe legal pathways to seek asylum.

#### 4.3. Finland's political and financial support to international refugee situations

UNHCR appreciates Finland's role in international crisis management, including mediation and peace keeping. UNHCR also wishes to highlight Finland's steadfast commitment to multilateralism and support for the UN. Finland's humanitarian policy supports protection of vulnerable groups in displacement, including vulnerable girls and women, survivors of sexual and gender-based violence and persons with disabilities. Finland also plays an important role with its support for the humanitarian-development nexus including in exploring opportunities for targeting development programs in large refugee-receiving countries to meet the needs of both host communities and refugees.

Finland is an important donor to UNHCR, including through its flexible and unrestricted core contribution. UNHCR encourages Finland's continued commitment to ensure predictable and increased levels of flexible funding to both humanitarian and development programs. UNHCR also encourages Finland to find humanitarian solutions and develop new innovative approaches to end displacement.

UNHCR looks forward to engaging closely with Finland on the issue of climate change and disaster displacement. The climate crisis is driving displacement and makes life harder for those already forced to flee. Many refugees, internally displaced people and the stateless live in climate "hotspots", where they often lack the resources to adapt to an increasingly hostile environment. UNHCR therefore calls on all parties to act now to support those most in need to resist the increasing violence of the climate crisis.<sup>28</sup> UNHCR thus welcomes the approval of the National Climate Change Adaptation Plan in Finland in December 2022, which recognizes how climate change increase forced and other migration.<sup>29</sup> UNHCR also welcomes Finland's support to developing countries in preparing and implementing national adaptation plans and concrete measures, through various development cooperation channels, from multilateral cooperation with UN organizations through to supporting non-governmental organizations.

To enhance Finland's support to refugee protection globally, UNHCR recommends Finland to:

1. Continue to promote the Global Compact on Refugees – ensuring its effective implementation – and sustained engagement in placing protection and solutions of refugee situations at the top of the international political agenda.
2. Continue the flexible resettlement quota and consider increasing the number of resettlement places to better meet global needs.
3. Continue exploring the introduction of complementary pathways, including labour and education pathways, as a demonstration of global solidarity and responsibility sharing for refugee protection.
4. Continue commitment to increased predictable financial and flexible humanitarian and development funding to support international as well as host countries' response to refugee situations around the world, including the effects of climate change.

UNHCR Representation for the Nordic and Baltic Countries

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<sup>28</sup> UNHCR, Climate change and disaster displacement <https://www.unhcr.org/climate-change-and-disasters.html>.

<sup>29</sup> Ministry of Forestry and Agriculture of Finland, <https://valtioneuvosto.fi/-/1410837/valtioneuvosto-hyvaksi-kansallisen-ilmaistonmuutokseen-sopeutumissuunnitelman> One of the objectives of the Plan is to support societal security and equality in developing countries and in this way prevent uncontrolled migration.