

**Written evidence submitted by the Ambassador for the Republic of  
Finland to the UK (FRE0122)**

[evidence begins on the following page]



30 July 2020

Rt Hon Hilary Benn MP  
Chair, Committee on the Future Relationship  
with the European Union  
House of Commons  
London  
SW1A 0AA

Dear Mr Benn,

I would like to thank you for your letter of 16 July 2020 requesting information about Finnish Government's arrangements for ensuring that United Kingdom nationals living in Finland can invoke their rights under the Withdrawal Agreement. I would also like to take this opportunity to thank you for the very insightful meeting with Mr Ville Skinnari, Minister for Development Cooperation and Foreign Trade of Finland, during his visit to the UK in February.

Rights of EU citizens living in the United Kingdom and United Kingdom nationals living in EU Member States remain a priority for the Union, its institutions and its Member States.

Part Two of the Withdrawal Agreement that deals with citizens' rights applies only as from the end of the transition period, with the exception of Article 19 of the Withdrawal Agreement. EU Member States have to put in place their systems for the issuance of residence documents so that they can start handling applications for a new residence status or a new residence document on 1 January 2021 at the latest. United Kingdom nationals have until at least 30 June 2021 to invoke their rights under the Withdrawal Agreement. Some Member States, like Finland, have chosen not to make use of this deadline and will accept applications also after 30 June 2021. In Finland, applications may be submitted from 1 October 2020 until 30 September 2021.

In line with the Withdrawal Agreement, all Member States have chosen either the constitutive or declaratory residence system. Finland is implementing a constitutive system.

In order to help Member States to fulfil their obligations under the Withdrawal Agreement in the best possible way, the Commission provides continuous supports to ensure a uniform interpretation of the Withdrawal Agreement and allow for exchange of information and best practices at the EU level.

Regarding your specific questions, we have consulted the appropriate authorities in Finland, including the Ministry of the Interior. Please find enclosed more detailed information about the arrangements in Finland.

I hope this is helpful to the Committee. It is regrettable that meeting in person is not possible under the current circumstances, but please do not hesitate to contact us if you require any further information.

Yours sincerely,



Markku Keinänen  
Ambassador of Finland to the UK

Encl. Appendix (2 pages)

**1) What is your estimate of the number of UK citizens currently living in your country and on what basis have you come to that figure?**

It is estimated that around 5,000 UK citizens live in Finland. According to the latest statistics by Statistics Finland, the number of UK citizens currently living in Finland is 4,701 (31 December 2019). This figure is based on registrations of the EU right of residence. Therefore, the actual figure may be slightly higher, as there might be UK citizens who have not registered their residence yet.

**2) Has your Government decided if it is going to implement a constitutive or declaratory system and has this decision been made public? If not, when will this decision be made and publicised?**

Finland is implementing a constitutive system. The Finnish Government's proposal is before Parliament and will be approved after the Parliament returns from the summer break. The legislation is due to enter into force on 1 October 2020.

According to the proposal, UK citizens with a registered EU right of residence in Finland must apply to exchange their previous registration based on the right of residence in the EU for the right of residence under the Withdrawal Agreement. The purpose of the application procedure is to verify that the applicant has the right of residence under the Withdrawal Agreement.

**3) Has your Government published guidance for UK citizens, and their family members, in your country explaining what they must do to secure their rights under the Withdrawal Agreement? If so, could you provide us with a link to the guidance online? If such guidance for UK citizens has not yet been published, by what date does your Government intend to do so?**

EU exit related instructions and customer bulletins can be found on Finnish Immigration Service's (Migri) website. More information about applying for a right of residence or right of permanent residence under the Withdrawal Agreement will be published in due course.

You can access the website via this link: <https://migri.fi/en/brexit/en>

The Ministry of the Interior of Finland has also published a press release on the topic on 11 June 2020.

You can find the press release here: [https://intermin.fi/-/suomessa-asuvat-britit-voisivat-syksylla-hakea-erosopimuksen-mukaista-oleskeluoikeutta?language=en\\_US](https://intermin.fi/-/suomessa-asuvat-britit-voisivat-syksylla-hakea-erosopimuksen-mukaista-oleskeluoikeutta?language=en_US)

**4) Whatever system your Government chooses to operate, what is the first step that UK citizens have to take, and what are the relevant dates by which they will have to complete this step, and any subsequent steps, in order to secure their rights under the Withdrawal Agreement?**

If a UK citizen wishes to continue residing in Finland after the transition period, i.e. after 2020, they must change their EU citizen's right of residence to a right of residence under the Withdrawal Agreement between 1 October 2020 and 30 September 2021. They may apply for either a right of residence or right of permanent residence under the Withdrawal Agreement.

As applications are not yet accepted, UK citizens are still asked to wait for further instructions. The online booking for appointments to apply for a right of residence or right of permanent residence

under the Withdrawal Agreement will be opened in September. Further information about the process will be provided closer to the time. The Finnish Immigration Service (Migri) will also announce the processing fees in September. The applications may be submitted from 1 October 2020 onwards either electronically through Enter Finland online service or using a paper form.

Those UK citizens Finland, who have not yet registered their EU right of residence, are advised to do so before the end of the transition period.

**5) Are lawmakers in your country required to pass any domestic legislation in relation to residency applications made by UK citizens living there? If so, are these laws already in place or scheduled to be considered and in effect by a certain date?**

As mentioned above, the legislation is due to enter into force on 1 October 2020.

**6) Finally, are there any issues or challenges specific to your country that are currently facing UK citizens who want to confirm their residency rights and what additional impact has Covid-19 had on the wider process?**

The increase in number of EU exit related applications has been taken into account in the capacity planning of the Migri service points, i.e. additional resources are in place when the application process opens on 1 October 2020. Furthermore, a new application form has been designed to streamline the provision of necessary information and the handling of cases.

In general, the Covid-19 situation has made application processing more difficult across all case groups, as appointment times at Migri's service points have been limited. This has also affected those UK citizens who have applied for the registration of their EU right of residence this spring and summer. Normally, the applicants would be required to visit a service point within three months of submitting their application online. Due to Covid-19, the time limit for proving their identity has been extended until 31 October 2020. At this stage, it is still difficult to assess how the Covid-19 situation might affect the applications submitted from 1 October 2020 onwards.



# Committee on the Future Relationship with the European Union

House of Commons, London, SW1A 0AA

Email: [freucom@parliament.uk](mailto:freucom@parliament.uk) Website: <https://committees.parliament.uk/committee/366/committee-on-the-future-relationship-with-the-european-union/>

16 July 2020

H.E. Mr. Markku Tapio Keinänen  
Ambassador of Finland to the United Kingdom

By email

Your Excellency,

The House of Commons [Committee on the Future Relationship with the European Union](#) is inquiring into the progress of ongoing negotiations between the UK and the EU and the implementation of the Citizens' Rights provisions of the Withdrawal Agreement.

The rights of EU citizens living in the UK and UK citizens living in the EU was an important and sensitive issue throughout the Article 50 negotiations with both sides agreeing that it was essential to uphold as far as possible the rights accrued by citizens in both of these categories during the UK's membership of the EU.

The Committee would be very interested in hearing from you about the arrangements your Government is making to ensure that UK citizens living in your country can secure their rights under the Withdrawal Agreement.

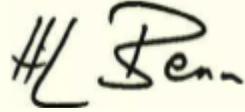
As well as any general observations you wish to make, we would welcome your answers to the following questions:

- What is your estimate of the number of UK citizens currently living in your country and on what basis have you come to that figure?
- Has your Government decided if it is going to implement a constitutive or declaratory system and has this decision been made public? If not, when will this decision be made and publicised?
- Has your Government published guidance for UK citizens, and their family members, in your country explaining what they must do to secure their rights under the Withdrawal Agreement? If so, could you provide us with a link to the guidance online? If such guidance for UK citizens has not yet been published, by what date does your Government intend to do so?
- Whatever system your Government chooses to operate, what is the first step that UK citizens have to take, and what are the relevant dates by which they will have to complete this step, and any subsequent steps, in order to secure their rights under the Withdrawal Agreement?
- Are lawmakers in your country required to pass any domestic legislation in relation to residency applications made by UK citizens living there? If so, are these laws already in place or scheduled to be considered and in effect by a certain date?
- Finally, are there any issues or challenges specific to your country that are currently facing UK citizens who want to confirm their residency rights and what additional impact has Covid-19 had on the wider process?

I am writing in similar terms to the other national Ambassadors of EU Member States to the UK based in London. All replies that the Committee receives will, in due course, be published on its website.

Should you have any questions at all, the Clerk of our Committee, Gordon Clarke, will be very happy to help. He can be contacted at [clarkeg@parliament.uk](mailto:clarkeg@parliament.uk).

I have the honour to be, with the highest consideration, Your Excellency's obedient servant,

A handwritten signature in black ink, appearing to read "H/ Benn". The signature is written in a cursive, slightly stylized font.

**Hilary Benn**  
**Chair of the Committee**