



UNHCR

United Nations High Commissioner for Refugees
Haut Commissariat des Nations Unies pour les réfugiés

UNHCR Representation for the Nordic and Baltic Countries

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RE: Government's Proposal for extending the validity of the temporary amendments to the Reception Act (SM014:00/2025)

Dear Madam,

I am writing to you about the Proposal for extending the validity of the temporary amendments for the *Act on the Reception of Persons Applying for International Protection and on the Identification of and Assistance to Victims of Trafficking in Human Beings* (hereafter the Reception Act), which has been circulated for comments. We are grateful for the invitation to provide comments to this Proposal.

The rationale behind extending the validity of the temporary amendments is the finalization of the comprehensive review of the Reception Act, which is expected later this year. UNHCR welcomes the plan to assess reception services and allowances comprehensively, jointly with the implementation of the EU Pact for Migration and Asylum. My office is keen on supporting this review and offers its expertise on the matter.

In the course of its work, UNHCR has received feedback from refugees and asylum-seekers regarding the reduced level of reception allowance. Furthermore, as the Proposal describes, there has been an increased need for food aid, emergency support, as well as social services. I would like to convey my concern about these indications of reduced levels of wellbeing among forcibly displaced persons since the temporary amendments came into force in August 2024.

Applicants and, in particular, those with specific needs, should at all times be treated in a humane and dignified manner, in line with international human rights law. Thus, reception allowances, even when reduced, must ensure an adequate standard of living for applicants.

Good practice suggests that adequate reception conditions reduce the likelihood of absconding and onward movement, as well as the risk of abuse and exploitation. Moreover, if asylum procedures are swift and efficient, with the requisite safeguards in place, reasonable levels of material assistance should not represent an excessive burden on the asylum state, nor an incentive for misuse of the system.

Ms. Mari Rantanen
Minister of Interior
Ministry of Interior, Finland

UNHCR therefore recommends that Finland, in connection with the comprehensive review of the Reception Act, ensure the reception allowance is sufficient to provide an adequate standard of living and reflects the actual living costs for asylum-seekers and beneficiaries of temporary protection.

I would like to thank you for your consideration of this important matter. My team would be pleased to engage in further consultations with your Ministry, and also offer technical assistance as required.

I look forward to continuing our close and constructive dialogue and collaboration to support forcibly displaced people.

Yours sincerely,



Annika Sandlund
UNHCR, Representative