

Lausunto

05.02.2026

Asia: VN/28598/2023

## **Lausuntopyyntö luonnonksesta hallituksen esitykseksi eduskunnalle laiksi kansalaisuuslain muuttamisesta ja siihen liittyyiksi laeiksi**

Lausunnonantajan lausunto

**Millaisia näkemyksiä teillä on ehdotetusta uudesta yhteiskuntatietoedellytyksestä?**

**Millaisia näkemyksiä teillä on kansalaisuuskoejärjestelmän ehdotetusta toteutustavasta?**

**Millaisia näkemyksiä teillä on ehdotettujen muutosten vaikutuksista?**

**Tähän voitte kirjoittaa muita mahdollisia näkemyksiänne.**

RE: Government's Proposal to Parliament for amending the Citizenship Act and related laws  
(SM056:00/2023)

Dear Madam,

I am writing with regard to the Government Proposal to Parliament for amending the Citizenship Act and related laws (Hallituksen esitys eduskunnalle laiksi kansalaisuuslain muuttamisesta ja siihen liittyyiksi laeiksi), which has been circulated for comments. UNHCR is grateful for the opportunity to provide observations on this Proposal.

The stated rationale of the Proposal is to reform the Citizenship Act in accordance with the Government Programme by tightening the requirements for naturalisation, to emphasize that the acquisition of citizenship requires proof of successful integration. To this end, the Proposal introduces the requirement to complete a citizenship test.

In earlier legislative comments, UNHCR noted that the introduction of additional requirements for permanent residence and citizenship may have adverse implications and could hinder integration. Based on UNHCR's experience, timely naturalization supports refugees and stateless persons in rebuilding their lives and contributing to host communities, while overly restrictive criteria create uncertainty and impede integration.

UNHCR acknowledges the use of clearly defined integration criteria for accessing citizenship, provided that such criteria allow for appropriate exceptions and give due regard to the specific vulnerabilities of refugees and stateless persons. Articles 34 of the 1951 Refugee Convention and Article 32 of the 1954 Convention relating to the Status of Stateless Persons, provide that Contracting States should, "as far as possible", facilitate the naturalization of refugees and stateless persons, without prejudice to State sovereignty. Measures to facilitate naturalization may include easing certain conditions for naturalization and granting favourable consideration to refugees and stateless persons, including through appropriate exceptions to strict requirements. Furthermore, as a State party to the 1961 Convention on the Reduction of Statelessness, Finland has undertaken commitments aimed at supporting efforts to prevent and reduce statelessness.

While a citizenship test may be appropriate in certain contexts, it may pose an insurmountable barrier for some refugees and stateless persons who may face particular difficulties in meeting knowledge-based requirements. This risk is especially acute for individuals already facing structural barriers, including survivors of torture or trauma, persons with limited literacy, older persons, and individuals with physical, mental, cognitive or long-term health conditions or disabilities. UNHCR welcomes the possibility of waiving the citizenship test for certain groups and allowing applicants to request special arrangements, such as additional time or a separate test space. However, as currently drafted, the scope of exceptions remains narrow, and may exclude individuals who are unable to meet the test requirements for reasons beyond their control, potentially restricting access to naturalization for some refugees and stateless persons.

UNHCR further notes that the citizenship test is subject to a fee to be paid by applicants. While the exact amount has yet to be determined, the Proposal indicates that the fee will be proportionate to the authorities' expenses for arranging the tests. UNHCR advises against the introduction of test fees for refugees and stateless persons in the context of naturalization applications, as they may constitute an additional barrier to accessing citizenship.

UNHCR encourages Finland to facilitate the naturalization of refugees and stateless persons in accordance with its international commitments. UNHCR also invites consideration of a broader scope of exceptions to support effective access to naturalization for refugees and stateless persons with specific needs. Finally, UNHCR recommends that Finland exempt stateless persons, refugees and other beneficiaries of international protection from test fees, consistent with Article 34 of the 1951 Convention and Article 32 of the 1954 Convention.

I would like to thank you for your consideration of these observations. I look forward to continuing our close and constructive dialogue and collaboration in support of forcibly displaced and stateless people.

Yours sincerely,

Annika Sandlund

UNHCR, Representative

Leino Maiju  
UNHCR Representation for Northern Europe