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**Subject:** VN/23086/2023; International Working Women of Finland Ry IWWOF; T3A2; Lausunto

We, the International Working Women of Finland Ry, express our concern regarding Proposal 1 (3), outlined in the request for statement VN/23086/2023-SM-3 from the Ministry of the Interior.

This proposal suggests amendments to the Citizenship Act, aiming to increase the residency requirement for naturalization from five to eight years. Additionally, it proposes the removal of exceptions for individuals under international protection and an increase in residency requirements for various other categories of applicants.

While we acknowledge the government's aim to reform citizenship laws, we believe that such stringent measures may have adverse effects on the integration and well-being of immigrants in Finland. Increasing the residency requirement could potentially hinder the integration process, making it more challenging for individuals to fully participate in Finnish society.

Moreover, the proposed amendments may exacerbate inequalities and limit opportunities for immigrants, especially those who face barriers to integration. It is essential to consider the diverse needs and circumstances of immigrants and ensure that citizenship policies promote inclusivity and equality.

The Etlä Economic Research Institute calculates that a yearly net migration of 44,000 people is needed to stabilize the size of Finland's labour force. However, the proposed amendments to the Citizenship Act, aiming to increase the residency requirement for naturalization from five to eight years, may hinder efforts to attract and retain skilled immigrants.

In contrast to Finland's approach, Germany has taken progressive steps to make its naturalization process more accessible. German lawmakers have passed a bill that simplifies the process of obtaining citizenship, allowing individuals to become German citizens while retaining their original citizenship. Furthermore, applicants can apply for citizenship after living in Germany for five years instead of eight, with the possibility of naturalization after three years for those who demonstrate exceptional integration achievements.

This approach not only enhances Germany's attractiveness to immigrants but also promotes economic advantages by encouraging skilled workers to settle and contribute to the country's growth.

We urge the Ministry of the Interior to conduct a comprehensive impact assessment to evaluate the potential effects of these proposed amendments on immigrant communities in Finland. It is crucial to involve stakeholders, including immigrant organizations and advocacy groups, in the decision-making process to ensure that citizenship policies align with principles of fairness and justice.

In conclusion, while we recognize the importance of updating citizenship

laws, we call for a balanced approach that takes into account the interests and rights of immigrants in Finland. We stand ready to engage in constructive dialogue and contribute to the development of inclusive and equitable citizenship policies.

Sincerely,

International Working Women of Finland Ry