



Stakeholders' opportunities to comment on policy and legislative proposals in Finland, 2015–2024

This document supplements the Civil Society Assessment published by Finnish Development NGOs Fingo (28.2.2024) for the OECD-DAC Peer Review of the development cooperation policies and programmes of Finland.

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Key findings that emerge from the statistical data, empirical experience and other information presented in this document:

- **A culture of open and confidential dialogue between different social actors, together with transparency, continues to characterise Finnish society in many ways.** This is evident, for instance, in the regular interaction between civil society organisations (CSOs) and the Ministry for Foreign Affairs (MFA) on concrete development cooperation issues. Another positive example is that the MFA proposed that a Finnish CSO participate in this peer review process, which is a pioneering initiative. **However, there is also evidence of a shift in a different direction.**
- **There is evidence of a trend indicating that the current Orpo government** (in power since June 2023) **provides fewer opportunities for stakeholders, in our case particularly civil society actors, to comment on policy and legislative proposals especially compared to the previous Rinne/Marin government (2019–2023).** This trend is reflected in the way the government handles its proposals with different stakeholders (e.g., providing information about the opportunity to comment, the time given for comment, and the opportunity to comment on draft text).
- **This less transparent approach has been used, for example, in the production of a government report intended to guide Finnish development policy** (published on 11 July 2024) **and another on implementing the Sustainable Development Goals of the 2030 Agenda** (to be published in autumn 2024). See Tables 2 and 3 in this document. This trend is further evidenced by the fact that **the government narrows the diversity of civil society by making reductions in funding from 2025, which will significantly impact especially small CSOs.** See Tables 4, 5 and 6 in this document.
- **There does not seem to be a consistent logic in how the Finnish government, ministries and the public sector, in general, use the digital public consultation service lausuntopalvelu.fi.** This service, which has been in use since July 2014 (in Finnish and Swedish), allows all public sector authorities to publish consultation requests and receive feedback electronically. While the use of this service has gradually increased with each government term, there is considerable variation in the way it has been used, which considerably undermines its potential to increase transparency in the opportunities for stakeholders to comment on policy and legislative proposals.

Introduction

We focus here particularly on the opportunities for CSOs, although some of the observations are also applicable to other stakeholders. We cover the term of the Orpo government (20.6.2023–) until the date of publishing this document (31.8.2024) and two previous governments: Sipilä (29.5.2015–6.6.2019) and Rinne/Marin (6.6.–10.12.2019 / 10.12.2019–20.6.2023). We will refer to the latter as the Marin government, as she was primarily the prime minister in this Social Democrat-led government, and no changes were made to the government programme when the prime minister changed.

The positive reflections on the relationship between the Finnish governments and the civil society actors made in the Civil Society Assessment for the OECD-DAC Peer Review on Finnish development cooperation are in many ways still valid, but crucial changes have also taken place since its publication. The key findings mentioned in this document are the experiences of the Finnish CSO community in general, as many Fingo members and colleagues from other CSO sectors constantly bring them up in various meetings and discussions, sharing similar concerns about the deteriorating state of civil society in Finland.

It is positive that on a practical, everyday level cooperation and interaction, for example, with the MFA Civil Society Unit, has continued to be open and fluid, for example regarding the development of reporting practices of MFA funding instruments. **Another example of continued positive interaction is the involvement of civil society actors in the preparation of Finland's third Voluntary National Review** on the implementation of the 2030 Agenda (to be published in 2025), as was the case with the second review. Again, there will be a parallel assessment made by the government and civil society actors on all 17 SDGs. Fingo will again coordinate the assessment of the civil society actors, and preparations for the process are underway. For the previous experience, see Case 2 in the Civil Society Assessment for the OECD-DAC Peer Review (page 18). **Another positive aspect is the invitation for a CSO to be part of the peer review team.**

There have been some difficulties on a practical everyday level as well. For example, it has been difficult to obtain information from the MFA on upcoming calls for CSO funding, and the interpretation of conditionality requirements (as presented in the Government Programme) has been left open. **But critical and concerning experiences in the context of development policy have been especially concerning the preparation of certain government reports.** A government report (*selonteko* in Finnish) is, as stated on the website of Parliament: “a statement concerning international relations or national governance, submitted by the government to Parliament. The parliamentary procedure for a report includes: a preliminary debate in a plenary session, a committee review, and a single reading in a plenary session. At the end of the final consideration, also known as the feedback debate, the plenary session approves Parliament's position on the report. The plenary session may vote on the content of the position but not on confidence in the government.”

In practice, government reports represent the government's interpretation of how it is implementing the Government Programme in different political processes. Governments are not obliged to provide opportunities for stakeholders to be heard, to make submissions, or to comment on drafts, but they have often done so. As a result, the way in which these reports are prepared varies from government to government. **In this document, we compare** the preparatory processes of three types of government reports, i.e. those of Finland on (1) **foreign and security policy**, (2) **development policy**, and (3) **implementation of the 2030 Agenda**. Below, in comparative tables 1, 2, and 3, you will find notes on the actions of the current government actions and those of the two previous governments in relation to these government reports.

In addition to commenting on the government reports, it is important to acknowledge the recent government decisions to significantly cut public funding for almost all sectors of civil society.

This is essential for a coherent and realistic understanding of the limited future capacity to comment on public documents, even when civil society is invited to do so. Three comparative tables (4–6) are presented on three civil society funding instruments that the Orpo government has decided to cut completely or almost completely from 2025 onward. The comparison also shows the amounts and changes in these funding instruments during the two previous governments. A short introduction to these funding instruments and the cuts made is provided in the text before the comparative tables. **However, these three funding instruments are only examples, as there are also other funding instruments facing similar cuts, such as those related to youth or culture.**

Another issue is the concrete impact on the ability to influence policy and legislative proposals, i.e. how openly government institutions are ready to acknowledge different stakeholders' views. It is public knowledge that the Orpo government has carefully listened to different private sector organisations already when formulating its Government Programme. The private sector's proposals have been effectively incorporated into the programme and other policy documents, sometimes even word for word.

At the end of this introduction, we would like to mention that there is a fear among Finnish civil society actors, expressed in numerous informal and formal civil society discussions, that Finnish society is moving in a more closed and passive direction in terms of transparency and the participation of a diverse combination of stakeholders.

Public consultation service

One way to assess the activity and transparency of the opportunities for stakeholders to comment on public proposals is to check the public consultation service: lausuntopalvelu.fi. The service has been in use since July 2014, available in Finnish and Swedish, and it states that: "The consultation service digitalises the consultation process. Lausuntopalvelu.fi provides the opportunity to request and provide statements electronically. All public sector authorities can publish requests for statements on the service. Statements can be given by all organisations and citizens. The consultation service is used by 39, 995 individuals, 9, 382 organisations" (as of 24.8.2024).

In general, it appears that the Prime Minister's Office, other ministries and other public bodies are gradually increasing the use of this service. This result was obtained by comparing the current and previous government terms. The comparison was made by dividing the number of consultation requests for each government term by their duration in days ([as reported by the Prime Minister's Office](#)) and calculating a comparative figure for each government term based on this information. The results were 16 August 2024: Sipilä 0,31 (456/1470); Marin 1,06 (1566/1477); Orpo 1,26 (535/424).

We reviewed the requests for statements made during the terms of office of the Orpo, Marin, and Sipilä governments and tabulated them by each term into two tables: the first shows the amounts of requests made by various ministries, and the second shows the amounts of requests made by various public institutions (see the appendix at the end of this document). Below are some observations on the results.

The public electronic consultative service has been used by all ministries during all government terms (12 ministries in each term) and by other public institutions, ranging from 15 institutions (during the Sipilä term) to 43 (during Marin's term). By 16 August 2024, 35 institutions had used the service during Orpo's term. The frequency of use of the service by specific ministries may vary between government

terms. However, it also appears that certain ministries generally use the service more actively than others across all government terms. Of course, many factors influence the frequency with which ministries use the service, and it is not relevant here to delve deeper into this comparison.

Nevertheless, **one thing, in particular, caught our eye: a significant fluctuation in the use of the service by the Ministry of the Interior between government terms. During Sipilä's term, the ministry used the service six times; during Marin's term 110 times; and during Orpo's term five times. The Finns Party was part of the Sipilä government and is now part of Orpo's government, and it is for this party that issues related to immigration, which fall within the remit of this ministry, are of key interest** (see also the chapter on experiences from CSOs working with immigration and refugee rights).

The issues on which requests for feedback are made vary significantly. Some of these issues do not seem to be substantial enough to warrant requests for comments, as they are basic matters that could be handled internally within the ministries or other public institutions. As a result, some requests received no or very few comments. On the other hand, **some very important issues were overlooked. For example, only five requests for comments were made regarding government reports during all three government terms**, despite the fact that these are crucial documents for guiding government policy in different sectors. Four of these were made by the Marin government (one on equality policy, one on human rights and two on trade), and the fifth was the Orpo government's Report on International Economic Relations and Development Cooperation.

Concerning the government's Report on International Economic Relations and Development Cooperation, it was also possible to send submissions by email, but the MFA insisted that they should be made by answering the questions presented in the public consultation request, as this approach would best serve the writing process. **Fingo also prefers to use the electronic public consultation service because it increases transparency, with all requests, comments, and submissions openly available to anyone interested.** In the end, however, only 11 CSOs submitted responses through the public consultation service, which, **according to informal information, is only a small proportion of all submissions received by the MFA – and this is a loss for the transparency of the commenting process.**

During the Orpo government, the MFA has not produced many policy documents on development and global issues, or they have been prepared without consultation with stakeholders. In addition to the above-mentioned government report, the public consultative service has received two requests: concerning the memorandum on the need for amendments to the Finnfund Act and the government's proposal to Parliament for a bill to amend the Foreign Affairs Administration Act. We have heard informally that many processes, such as the preparation of the next country strategies and/or programmes for long-term development cooperation partners, are waiting for the publication of the Report on International Economic Relations and Development Cooperation. We hope that the MFA will engage in dialogue with stakeholders, including CSOs, during their preparation, as it has done previously. There has been active cooperation between the MFA and Fingo in organising consultations regarding new country programmes.

A major negative experience with the public consultation service is that some organisations have found that they no longer receive email notifications of electronic consultations in their area of work, even though they used to receive such notifications. They now have to proactively check the consultation service website to avoid missing the opportunity to respond to requests for statements that are important to their work.

Experiences of CSOs working with immigration and refugee rights

The main problems under the Orpo government were summarised as: extremely short consultation periods; poor drafting of legislation, especially concerning human rights impact assessments and justification of the need for changes to the law; a lack of cumulative impact assessment (of different policy decisions); and the disregard for expert advice (in policy development).

Shortcomings are noted also by the National Audit Office of Finland which writes in its Fiscal policy monitoring assessment on the management of general government finances (published June 11, 2024): "... key figures related to the calculations cannot be found in government proposals. The Government should ensure that all impact assessments and the figures needed to repeat the calculations are found in government proposals." (on page 22).

In autumn 2023 and spring 2024, the consultation periods for government proposals related to immigration were unusually short, often only 2-3 weeks. According to the government's guidelines for drafting legislation, the consultation period should be at least 6-8 weeks. The Chancellor of Justice has repeatedly confirmed that urgent legislative drafting and shortcomings in the consultation process cannot be justified. The extremely short consultation periods have received much criticism, but **the Ministry of Justice is now investigating whether shorter consultation periods could be adopted generally.**

Contrary to the principles of good governance and the promotion of democracy, **the Ministry of the Interior, in particular, has often closed consultation rounds, and failed to use the public consultation service.** Legislative proposals have often been poorly justified and based primarily on political ideology and intentions rather than actual needs or facts. **The views of experts and researchers have repeatedly been ignored** in the drafting process. There has been no impact assessment of the combined effects of overlapping proposals, which has been a major concern for many organisations.

Some CSOs have found it very difficult to engage in dialogue with the Minister of the Interior, and there has been little willingness to make time to listen to CSOs or to engage in joint dialogue. During the previous government term, CSOs had a relatively good connection with the Minister and the ministry overall. Under the Marin government, there were no similarly far-reaching and fast-tracked changes to the law, so the legislative schedules and processes were very different.

Even before the current Orpo government, the consideration of the views of civil society and experts in drafting legislation was somewhat weak. During the Sipilä government, it was already noticeable that, despite the criticism expressed in expert statements, many legislative changes were pushed through that weakened refugee rights. One example is the weakening of legal protection for asylum seekers, as documented in studies, such as the report on the asylum process.

On the other hand, **during Marin's government, there was a noticeable shift in the way civil society was involved in decision-making.** CSOs and other civil society entities were invited to hearings and ministerial working groups where future legislative initiatives were prepared or the need for legislative changes discussed more generally. **Unfortunately, under the current Orpo government, this form of involvement has depended entirely on the interests and schedules of individual drafters of legislation.**

Other reflections

Finland's national plan for the reconstruction of Ukraine

The Orpo government is preparing a two-part national plan for the reconstruction of Ukraine. [The first part](#) was published on 21 December 2023, by the MFA, in collaboration with the Ministry of Economic Affairs and Employment, Ministry of Finance and business stakeholders. It focuses in particular on financing and advisory services relevant to Finnish companies. **The second part, to be published in 2024, will have a broader focus on the participation of Finland's central government and various stakeholders in the reconstruction and the use of Finnish development cooperation funds. Finnish CSOs were not involved in the preparation of the first part. For the second part, there have been separate meetings** and further contacts with those CSOs that have activities in Ukraine. These CSOs have also proactively shared information with the MFA, for example, when receiving visitors from Ukraine. At least one Finnish CSO is involved in a network for the reconstruction of Ukraine, which focuses on education and includes representatives from ministries, other public institutions, and the private sector. As far as Fingo knows, **these CSOs have not had the opportunity to comment on the draft plan and no public hearing on the second part has been organised.** Hopefully, one will be organised. In Fingo's opinion, **it would have been important for the MFA to have used the expertise of Finnish CSOs on Ukraine in the preparation of the first part as well.** For example, the report states (on page 17): "Among other things, Finnish companies need information and training related to Ukraine as a business environment and finding potential business partners. The advisory and training offer should cover the opportunities and risks of the Ukrainian business environment comprehensively, including the following areas...". Among the 12 different areas listed is: "Opening doors to the public sector, businesses and NGOs in Ukraine".

CSO Strategy 2023-2027, Government resolution on the development of civic space

The Ministry of Justice published the [CSO Strategy 2023–2027. Government resolution on the development of civic space](#), on 6 June 2024. The process of preparing the strategy was inclusive, with several stakeholder meetings and online discussions, but CSOs have raised significant criticisms regarding the content of the strategy versus the reality of government action. The strategy mentions that, for example: (1) The aim is for CSOs to feel that they are being listened to, not just heard; and (2) Interaction between administration and civil society will be promoted as part of the development of public administration management and personnel competence. This development work will place particular emphasis on dialogue and interaction skills. **CSOs have criticised the government for not acting in line with its own strategy. Significant cuts to many CSO funding instruments were announced around the same time as the strategy was published. [Critical observations on the strategy by five national umbrella organisations](#) (including Fingo) was published on 6 July 2024 (in Finnish).**

Comparative tables

The comparison on three government reports

As mentioned in the introduction, **we will present two types of comparisons** of opportunities for stakeholders to comment under the current and the two previous governments. The first set focuses on three government reports relevant to development policy. These three government reports are on Finnish foreign and security policy (Table 1), Finnish development policy (Table 2), and the implementation of the 2030 Agenda (Table 3). The comparison shows that **there are clear differences in consultation practices between governments in two of these areas** (development policy and the 2030 Agenda), **and less so in the third** (foreign and security policy).

Table 1. Government reports on Finnish foreign and security policy
 Three of these reports have been published during the review period of this document, in 2016, 2020 and 2024

COMPARISON/COMMENTS: There hasn't been a real consultation process organised by any of these three governments on foreign and security policy. It was positive that the Orpo government organised a hearing, but the way it was conducted caused frustration among the hundred participants. They were only able to comment and ask questions on oral remote presentations of each report, as draft texts were not available, and PowerPoint presentations were not shown. Participants raised a significant number of concerns. Had the draft texts been available, it would have been possible to verify whether the concerns were justified. There wasn't enough time to answer all the questions asked via chat. Invitations were sent out only a week in advance and the event was inadvertently cancelled a few hours before it was due to take place. The cancellation was reversed, but only half of the original invitees received the updated message and correct meeting link. **The process was perceived as opaque and somewhat unclear, raising the question of whether this is the new normal for participation.** However, at least civil society actors were aware of the preparation of this government report from the outset and thus knew that they could proactively share their views with the relevant authorities, even though they were not formally invited to do so, as was the case with Fingo (see below).

Key activities by different governments		
Sipilä government	Marin government	Orpo government
<p><u>Government Report on Finnish Foreign and Security Policy</u></p> <p>Published by 17.6.2016.</p> <p>We couldn't find any information on opportunities to comment on the draft version or call for submissions during the preparatory process.</p> <p>CSOs could make statements to parliamentary committees when the published report was discussed.</p>	<p><u>Government Report on Finnish Foreign and Security Policy</u></p> <p>Published by 29.10.2020.</p> <p>We couldn't find any information on opportunities to comment on the draft version or call for submissions during the preparatory process.</p> <p>CSOs could make statements to parliamentary committees when the published report was discussed.</p>	<p><u>Government report on Finnish foreign and security policy</u></p> <p>Published by 20.6.2024.</p> <p>No public invitation to stakeholders to make submissions or opportunity to comment on the draft text. A hearing was organised (2.5.2024), so that it was also on the Report on International Economic Relations and Development Cooperation (see the description above).</p> <p>However, Fingo was proactive and requested and received meetings with the following: Office of the President (chief of staff, director of peace mediation); MFA (under-secretary of state, two persons in charge of drafting the report, director of UN and global affairs, special advisor to minister Tavio, special advisor to Minister Valtonen); and MPs involved in the monitoring group.</p> <p><u>Fingo's submission</u> (in Finnish) published 11.3.2024. <u>Fingo's analysis on the report</u> (in Finnish) published 28.6.2024.</p>

Table 2. Government reports on development policy.

This table includes also the Katainen/Stubb government term (2011-2015).

COMPARISON/COMMENTS: The consultation processes of each government are documented below. **It is only since Sipilä's government that Finnish development policy programmes have had the status of a government report and thus been subject to a parliamentary process.** The Marin government tried to strengthen the institutional persistence of national development policy by producing the Report on Development Policy across Parliamentary Terms, as it is crucial for the effectiveness and sustainability of development cooperation that development policy and its priorities do not fluctuate between government terms. However, **the report did not live up to its promise as the Orpo government discarded it and produced a new report that combines foreign trade and development policy. It is unfortunate that there was no opportunity to comment on the draft version. There are many shortcomings in the text,** for example, points that should have been addressed from a language perspective, internationally agreed or other development policy objectives are missing, and the contents differ from other reports, for example fragile states and the focus on Africa are recorded differently than in the Foreign and Security Policy Government Report. As there is no legislation on development policy in Finland, the guidance reports should support the internationally agreed mandate.

Key activities by different governments

Katainen/Stubb	Sipilä government	Marin government	Orpo government
<p>Finland's Development Policy Programme Published 16.2.2012.</p> <p>Heidi Hautala was the minister responsible for the preparatory process and she made it a very open exercise. All stakeholders were brought together. There were three meetings with officials and the room was full. The discussions were detailed and focused on one topic at a time. It was the most open process ever.</p> <p>The programme did not proceed to parliamentary review as its status was a policy programme and not a government report.</p>	<p>Government Report on Development Policy: One World, Common Future - Toward sustainable development Published 4.2.2016.</p> <p>Good: For the first time the document was presented as a government report and subjected to parliamentary review. The new status brought continuity to long-term planning. Negative: prepared under the leadership of the ministry, broad sectoral support for new policy priorities was not sought. No decisions were taken regarding long-term goals or principles of development policy. The Development Policy Committee (DPC): The process was tightly controlled within the MFA. The DPC could comment to the Under-Secretary of State and the secretariat but did not have the same level of input as during Marin's term.</p>	<p>Report on Development Policy across Parliamentary Terms Published 27.5.2021.</p> <p>Fingo and other CSOs published their largely positive reflections on the report (27.5.2021)</p> <p>An inclusive preparatory process in Parliament and with stakeholders. The MFA and Fingo organised (30.9.2020) a hearing for CSOs on the first draft (9/2020) remotely due to Covid time but so that all participants had a real opportunity to contribute (breakout rooms). Fingo compiled the comments and included also written ideas from some CSOs in the package for the MFA (12.10.2021). The next draft (7.12.2020) was shared with the DPC, and Fingo and many CSOs were given the opportunity to comment on this version as well.</p>	<p>Report on International Economic Relations and Development Cooperation Published 11.7.2024.</p> <p>Stakeholders were able to send submissions (16.10.–7.11.2024) to the MFA, through the public consultation service or otherwise. A hearing was held (2.5.2024) at the same time as that on the report on foreign and security policy. However, the process was not participatory, with feedback only solicited at the level of ideas. The DPC and CSOs asked to receive the text for comment, but without success.</p> <p>Fingo's comments on the Report on International Economic Relations and Development Cooperation (in Finnish) (published 7.11.2023) Fingo's press release on the report (in Finnish) (published 15.7.2024). Fingo will publish in September a more profound analysis of the report.</p>

Table 3. Government reports on the implementation of the 2030 Agenda. Finland has issued two of these reports (2017 and 2020), and at the end of August 2024, the third one was in the progress.

COMPARISON/COMMENTS: There is a clear difference in the stakeholder involvement of the Sipilä and Marin governments compared to that of the Orpo government. The preparatory processes for the first and second reports were generally inclusive and the [Finnish National Commission on Sustainable Development](#) played an active role. So it was a surprise to learn by chance in mid-August 2024 that a full draft of the third report had been completed in June and that the members of [the coordination network](#) on sustainable development, which includes representatives from each ministry, had been asked to comment. No contact had been made with CSOs, nor had the national commission been informed about the timetable for preparation. There has been information on the commission website that the report will be presented to Parliament in the autumn 2024 (see below), but in such a place that it is not easily noticed. **It would have been logical to involve the Commission in the preparatory process in some way, as one of its key tasks is to accelerate the implementation of the 2030 Agenda and to make it an integral part of the national work on sustainable development.**

Key activities by different governments		
Sipilä government	Marin government	Orpo government
<p>Government Report on the implementation of the 2030 Agenda for Sustainable Development Sustainable Development in Finland – Long-term, Coherent and Inclusive Action Published 13.2.2017</p> <p>The preparatory process was an open and inclusive. The Commission played an active role, and other stakeholders were widely involved. There was positive feedback from CS actors, but the draft caused frustration. Fingo (Kepa at that time) considered that CSOs should make a collective public statement on tokenism. However, the idea was dropped, as some improvements were made in the next version, and there were different opinions among CSOs on the content of the report and planned actions. During the parliamentary review, Fingo gave adapted statements to several committees. Here is a link to the one made to the Agriculture and Forestry Committee.</p>	<p>Towards a carbon-neutral welfare society – Government Report on the implementation of the 2030 agenda Published 8.10.2020</p> <p>The preparatory process was again open and inclusive but quite long due to COVID-19. The national commission again played an active role, and other stakeholders were widely involved. The first preliminary outline of the content was presented to the Commission at the end of 2019, after which it was possible to send submissions on the report. Fingo put together a fairly large package for all the teams it works on and asked for and received some contributions from its members. Stakeholders had the opportunity to comment on the first draft in February/March 2020. After that there was a break in the process due to Covid pandemic, but on 10 October 2020 the report was published.</p> <p>Some of Fingo's comments were taken on board, but not the most politically important ones, such as ideas about indicators beyond GNP and the spillover effect beyond our borders.</p>	<p>The website of the Finnish National Commission on Sustainable Development (the Finnish version) stated in August: “Prime Minister Orpo's government is preparing a government report to Parliament on the Agenda 2030 implementation. The report will be submitted to Parliament in the autumn of 2024.” In the version in English it says: “The Government’s work to carry out the action plan is prepared and coordinated by the Prime Minister's Office’s General Secretariat on Sustainable Development. The coordination network on sustainable development includes representatives from each ministry and is intended to facilitate co-operation between ministries.”</p> <p>According to the information we obtained by chance in August, the draft of the report will be presented on 27 August at the meeting of State Secretaries, and depending on that, it will be submitted to the government and then to Parliament.</p> <p>No consultation has taken place, and most members of the Commission have been unaware of the process.</p>

The comparison of three civil society funding instruments

The cuts decided by the Orpo government will significantly impact a large number of civil society actors, particularly those engaged in advocacy, communication and global education at the national level, especially in the fields of foreign policy, peace, security, corporate accountability and private sector due diligence. It appears that several of these civil society actors will not be able to continue their activities or will have to significantly reduce their work, as they had received funding from several funding instruments that will either not exist after 2024 or will have almost all of their resources cut off. Among the CSOs that are heavily affected is the Finnish UN Association, which was formed in 1954 and has been said to be the cornerstone of Finland's United Nations membership, which was achieved in 1955. **The public grant instruments for CSOs which are compared below, are on communication and global citizenship education (Table 4), public grant instrument for CSOs working on peace issues (Table 5), and the public grant instrument for CSOs working on foreign and security policy (Table 6).**

Table 4. Public grant instrument for CSOs on communication and global citizenship education		
<p>COMPARISON/COMMENTS: As shown below, the Sipilä government made cuts to this grant, then the Marin government commissioned an evaluation and slightly increased the total amount of the grant. The Orpo government decided in June 2024 not to open the grant during its government term. The discontinuation of this subsidy has a multiplier effect:</p> <ol style="list-style-type: none"> (1) As a result of the discontinuation of support, small and medium-sized organisations in particular will have to reduce or completely cease their VGK (global education and communication) activities. Many of these CSOs have also been affected by cuts to grants for UN-affiliated, peace, youth, etc., so the impact is quite significant. (2) With the discontinuation of VGK support, communication, advocacy, and education on global issues targeted at Finnish audiences will be significantly reduced. Consequently, Finns will no longer receive information on global sustainability issues and how to influence them. (3) Teachers and schools will be left without support and learning materials for global education under the national curriculum. (4) Corporate responsibility work and collaboration between organisations and businesses will also suffer. The new corporate responsibility regulations require companies to have a better understanding of the realities in the countries where their products are made and effectively mandate stakeholder consultation. This funding cut directly affects companies that have benefited from the expertise and networks of CSOs that have received VGK support in their own responsibility efforts. (5) Inter-ministerial cooperation to promote SDG 4.7 has ceased, and collaboration with organisations on this theme has also ended following the termination of the position of the official responsible at the MFA, and no new person has been appointed. 		
Key activities by different governments		
Sipilä government	Marin government	Orpo government
As part of the process of implementing significant cuts in ODA in 2015/16, this grant was postponed by one year, i.e. the 2017 application round was postponed to 2018 (for projects implemented in 2019-2020). It was then decided that from 2018 the grant would be awarded every two years starting, instead of annually – and the	<u>The grant instrument was externally evaluated in 2020</u> to identify the effectiveness, strengths and development needs of the grant. The results of the evaluation show that the instrument succeeds in supporting a diverse and pluralistic group of CSOs that implement a wide range of communication and education projects, reaching different target groups at the grassroots level in Finland. The results also show that the instrument contributes to the achievement of	In 2024 the Orpo government decided not to open the grant for the government term. The development of the grant instrument was discontinued, regardless of the results of the evaluation and previous development work carried out by the MFA. The employment of the MFA's responsible GCE (global education) officer ended at the civil society unit, and no new person has been appointed to the

<p>amount of the grant was significantly reduced. As can be seen below, there were 2.04 million euros available for one year in 2015, much less (1.4 million euros) for the following year, and then the same amount was allocated for two years in 2019–2020.</p> <p>Links to news of the grant decisions at the MFA website (in Finnish):</p> <p>2015: 2.04 million euros for 43 organisations</p> <p>2016: 1.40 million euros for 19 organisations.</p> <p>2019–2020: 1.4 million euros for 14 organisations (grant applications 2018)</p>	<p>Finland's development policy objectives and has a clear added value for the implementation of the 2030 Agenda in Finland and for engaging citizens in sustainable development. In its management response (2021), the MFA committed itself to developing the instrument, e.g. by making the application rounds regular and more predictable and developing the application guidelines and instructions. During Marin ´s term the amount of the grant increased somewhat (see below) and development work was carried out, which was then discontinued by the Orpo government. Inter-ministerial cooperation led by the MFA was also developed during Marin ´s term to coordinate work on SDG 4.7 in Finland. There was strong cooperation with civil society (especially with Fingo and its members and researchers).</p> <p>Links to news of the grant decisions at the MFA website on (in Finnish):</p> <p>2021-2022: 2.17 million euros for 19 organisations</p> <p>2023-2024: 2.2 million euros for 19 organisations</p>	<p>post. The MFA's development communication department was abolished in 2024. Cooperation with CSOs on global education, communication and SDG 4.7. has decreased significantly.</p> <p>Link to news at the MFA website: Foreign Ministry to renew government grants awarded to civil society organisations for development cooperation (10.6.2024)</p> <p>Fingo's press release (in Finnish) (10.6.2024)</p> <p>Statement of more than 60 CSOs that this funding instrument should be made available during this parliamentary term as well. (in Finnish) (12.6.2024)</p> <p>An article by national newspaper Helsingin Sanomat: The Ministry of Foreign Affairs is discontinuing an important support for organisations. (in Finnish) (10.6.2024)</p>
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Table 5. Public grants for national peace organisations
<p>COMPARISON/COMMENTS: The willingness of the Sipilä, Marin and Orpo governments to support national peace organisations from public funds varies. The Sipilä government followed the usual Finnish practice and offered these grants but reduced the amount. The Marin government wanted to bring the total amount closer to previous levels, specifically those before 2016. In the supplementary budget for 2020, it decided to increase the amount by 200,000 euros, bringing the total to 500,000 euros. Even this level was considered low by the Finnish Peace Union (Rauhanliitto) in its Statement on the state budget proposal and support for peace work 2021 (in Finnish, 3.11.2020). The level before 2016 had been 560,000 euros, but according to Rauhanliitto, it should be 1million euros to properly cover all activities of peace organisations. There has also been, at least once, additional core support from the MFA (200,000 euros). At the end of 2019, the Marin government transferred the coordination of the grants from the Ministry of Education and Culture to the Ministry of Justice (support for Finnish peace work, budget item of the Ministry of Justice 25.01.50). This transfer included 300,000 euros for the grants in 2020. The Minister of Justice commented in a press release (in Finnish, 21.11.2019) that national peace work contributes to the promotion of democracy and human rights, and that supporting the activities of peace organisations fulfils the government's promise of non-discrimination, where human rights and dignity belong to everyone. The state grants are intended for national civil society organisations whose mission is to promote peace work in Finland.</p> <p>The Orpo government decided on 25 April 2024, to discontinue the general grant of 325,000 euros reserved for peace work, starting from the beginning of 2025. The discontinuation could be a fatal blow to many organisations. Several press releases by CSOs were published. Here are points in English from one of them, issued by six peace organisations (in Finnish, 26.4.2024): The government decided to discontinue state funding for peace work in Finland. The decision was communicated at an unofficial meeting to some of</p>

the grant recipients. The government does not plan to announce the decision publicly. President Alexander Stubb has sought to build Finland into a superpower of peace work. Achieving this goal will be difficult because peace organisations have nurtured Finnish peace work experts for over a hundred years. Finnish peace organisations have been reliable partners of the ministries in advancing Finland's peace efforts both nationally and internationally. The current decision is part of a creeping militarism that aims to weaken the operating conditions of civil society in Finland. The conditions for peace movements have also been weakened in the new NATO member state Sweden, and they have been completely shut down in Russia, Belarus, and Hungary. The discontinuation of the grant comes at a time of war in Europe. The last attempt to suppress the peace movement in Finland was in 1907. **Here are also links to some other CS press releases**, such as that of [the Finnish UN Association](#) with 12 other CSOs (in Finnish, 3.5.2024, including the six that issued the above-mentioned press release) and [that of Fingo](#) (in Finnish, 26.4.2024). The Ministry of Justice is also cutting support to other sectors by euros 3,2 million.

Amount of grants		
Sipilä government	Marin government	Orpo government
Grants for 2016: Total 412 000 euros Grants for 2017: Total 412 000 euros Grants for 2018: Total 410 000 euros Grants for 2019: Total 400 000 euros	Grants for 2020: Total 500 000 euros. Decision for the original 300 000 euros was made by Sipilä government, additional grant of 200 000 decided by Marin government. Grants for 2021: Total 700 000 euros Grants for 2022: Total 600 000 euros Grants for 2023: Total 852 000 euros for 20 CSOs, mainly for four main peace associations (560 000)	Grants for 2024: Total 325 000 euros Grants for 2025-2027: no grants.

Table 6. Public grants for CS activities on foreign and security policy

COMPARISON/COMMENTS: As with public grants for civil society peace work, there have been similar types of grants for CSOs working on foreign and security policy. The Orpo government (MFA) decided in May 2024 to discontinue state grants intended for CSOs' foreign and security policy activities starting from 2025 but changed this decision partly in its budget negotiations in September 2024 so that there will be 1million euros for this purpose. At the time of writing, however, it was not clear what criteria would be used to grant this support to CSOs. The press release of the Finnish UN Association following the first decision points out that the discontinuation of the grant will paralyse its operations as this grant has covered about half of the UN Association's income: [The discontinuation of foreign and security policy state aid will collapse Finnish UN communication, advocacy, and education – 'Civil society is being dismantled in Finland.](#) (22.5.2024). Here are some other links: [that of the UN Women Finland](#), and [an article from the Helsingin Sanomat newspaper](#).

Amount of grants		
Sipilä government	Marin government	Orpo government
Grants for 2016: - Grants for 2017: Total 911 000 euros Grants for 2018: Total 911 000 euros Grants for 2019: Total 911 000 euros	Grants for 2020: 1 061 000 euros Grants for 2021: 1 126 000 euros Grants for 2022: 1 917 000 euros Grants for 2023: 1 726 000 euros have been awarded to 26 CSOs. News article at the MFA web (17.2.2023)	Grants for 2024: 1 063 000 euros have been awarded to 19 CSOs. News article at the MFA web (6.3.2024). Grants for 2025: 1 000 000 euros Grants for 2026-2027: No grants will be awarded.

Appendix

This appendix presents the data collected on the requests for statements made during the Orpo, Marin, and Sipilä governments through the public consultation service: lausuntopalvelu.fi. As explained in page 3, the data is tabulated by each term into two tables: the first shows the numbers of requests by different ministries, and the second table shows the number of requests made by different public institutions.

Orpo's government term: Tables 1 and 2 show the requests for statements made during Orpo's government from 21 June 2023 to 16 August 2024. The first day of the Orpo government's, 20 June 2023, is the same as the last day of Marin's government, so the requests for statements from that day are included in Marin's government summary. During Orpo's term, there have been a total of 535 requests for statements, 399 from ministries and 136 from public agencies. Divided by the number of days in office (424), the comparative figure is approximately 1.26 per day.

Table 1

Ministry	2023	2024 Concluded	2024 Ongoing	Total
Ministry of Social Affairs and Health	41	22	27	90
Ministry of Economic Affairs and Employment	32	20	15	67
Ministry of Finance	28	19	10	57
Ministry of the Environment	13	18	8	39
Ministry of Transport and Communication	20	14	6	40
Ministry of Justice	11	18	8	37
Ministry of Education and Culture	12	14	6	32
Ministry for Foreign Affairs	7	6	1	14
Ministry of Defence	2	6	2	10
Ministry of Agriculture and Forestry		3	2	5
Ministry of the Interior		3	2	5
Prime Minister's Office	1	1	1	3
TOTAL	167	144	88	399

Table 2

Ministry	2023	2024 Concluded	2024 Ongoing	Total
Finnish Environment Institute	13	10	4	27
Finnish Transport and Communications Agency	13	6	6	25

Centres for Economic Development, Transport and the Environment from the following regions: Lapland, Kainuu, Uusimaa, Northern Savonia, North Karelia, Southern Savonia, Western Uusimaa, Southeast Savonia, Southern Ostrobothnia, Northern Ostrobothnia, Häme, Central Finland, Pirkanmaa, Southwest Finland, Central Finland.	7	16		23
Finnish National Agency for Education	7	3	3	13
Energy Authority	8	1	3	12
State Treasury	6	2		8
Finnish Transport Infrastructure Agency	2	2		4
Radiation and Nuclear Safety Authority	1	2	1	4
Finnish Institute for Health and Welfare	1	3		4
The National Archives of Finland		2	1	3
Financial Supervisory Authority	1	1		2
National Land Survey of Finland	1	1		2
City of Oulu	1			1
The Matriculation Examination Board	1			1
Wellbeing Services County of Central Finland	1			1
Forest Centre	1			1
Regional Council of Central Finland	1			1
Regional Council of South Carelia	1			1
Finnish Rail Regulatory Body	1			1
Metsähallitus (Finnish Forest Administration)	1			1
National Nutrition Council		1		1
TOTAL (35 public agencies)	68	50	16	136

Marin's government term: Tables 3 and 4 show the requests for statements made during Marin's government from 6 June 2019, to 21 June 2024. Marin's government's first day, 6 June 2023, is the same as the last day of Sipilä's government, so the requests for statements from that day are included in the summary of Sipilä's government. There were a total of 1,566 requests for statements during Marin's term, 1,299 by ministries and 267 by public agencies. Divided by the number of days in office (1,477), the comparative figure is approximately 1.06 per day.

Table 3

Ministry	2019	2020	2021	2022	2023	TOTAL
Ministry of Transport and Communication	27	67	62	37	18	211
Ministry of Economic Affairs and Employment	13	48	59	73	12	205
Ministry of Finance	17	29	42	57	21	166
Ministry of Justice	17	34	49	38	22	160
Ministry of Social Affairs and Health	7	22	39	65	16	149
Ministry of the Environment	21	25	41	42	12	141
Ministry of the Interior	11	11	11	55	22	110
Ministry of Education and Culture	6	12	25	30	3	76
Ministry for Foreign Affairs	5	6	8	11	4	34
Ministry of Agriculture and Forestry	3	13	5	5	3	29
Ministry of Defence			3	7	2	12
Prime Minister's Office	1	1	2	1	1	6
TOTAL	128	268	346	421	136	1299

Table 4

Public agencies	2019	2020	2021	2022	2023	TOTAL
Finnish National Agency for Education	11	20	23	11	16	81
Finnish Transport and Communications Agency	3	13	21	17	15	69
Financial Supervisory Authority	5	1	7	8	1	22
Centres for Economic Development, Transport and the Environment from the following regions: Lapland, Kainuu, Uusimaa, Northern Savonia, North Karelia, Southern Savonia, Western Uusimaa, Southeast Savonia, Southern Ostrobothnia, Northern Ostrobothnia, Häme, Central Finland, Pirkanmaa, Southwest Finland, Central Finland.	1	18	1			20
Radiation and Nuclear Safety Authority	1	5	4		1	11
Finnish Environment Institute				1	7	8
State Treasury			1	6		7

Finnish Transport Infrastructure Agency		1	1	2	3	7
The National Archives of Finland		2	2	2	1	7
Digital and Population Data Services Agency		1	1	2	1	5
Finnish Institute for Health and Welfare		2	2			4
Forest Centre				2	1	3
Finnish Competition and Consumer Authority				1	1	2
Finnish Heritage Agency					2	2
The Matriculation Examination Board				1	1	2
Kainuu Social and Health Care Joint Authority		1	1			2
Regional Council of Central Finland			1	1		2
Metsähallitus (Finnish Forest Administration)			1		1	2
National Audiovisual Institute	1					1
National Land Survey of Finland			1			1
City of Joensuu					1	1
City of Kauhajoki				1		1
Regional Council of Lapland			1			1
Helsinki-Uusimaa Regional Council			1			1
Regional Council of South Carelia			1			1
Finnish Rail Regulatory Body					1	1
Orthodox Church of Finland				1		1
Finnish National Board on Research Integrity				1		1
Population Register Centre.	1					1
TOTAL (43 public agencies)	23	64	70	57	53	267

Sipilä's government term: Tables 5 and 6 show the requests for statements made during Sipilä's government from 29 May 2015, to 6 June 2019. There was a total of 456 requests for statements during Sipilä's term, 387 by ministries and 69 by public agencies. Divided by the number of days in office (1,470), the comparative figure is approximately 0.31 per day.

Table 5

Ministry	2015	2016	2017	2018	2019	TOTAL
Ministry of Justice	3	7	30	42	11	93
Ministry of the Environment		1	7	45	15	68
Ministry of Transport and Communication			5	53	9	67
Ministry of Finance	3	8	9	21	6	47
Ministry of Economic Affairs and Employment			10	19	5	34
Ministry of Education and Culture	1	1	7	14	2	25
Ministry of Social Affairs and Health	1		3	7	5	16
Ministry for Foreign Affairs			2	7	1	10
Ministry of Defence			5	3	2	10
Ministry of Agriculture and Forestry			2	4	3	9
Ministry of the Interior			4	1	1	6
Prime Minister's Office		1	1			2
TOTAL	8	18	85	216	60	387

Table 6

Public agencies	2015	2016	2017	2018	2019	YHTEENSÄ
Centres for Economic Development, Transport and the Environment from the following regions: Southern Ostrobothnia, Southern Savonia, Häme, Southeast Savonia, Kainuu, Central Finland, Lapland, Pirkanmaa, North Karelia, Northern Ostrobothnia, Northern Savonia, Uusimaa, Southwest Finland.				20	2	22
Financial Supervisory Authority			1	8	5	14
Radiation and Nuclear Safety Authority			3	7	2	12
Central Finland 2020 Project				3		3
Finnish National Agency for Education					3	3
The Security Committee			2	1		3
City of Jyväskylä	1		1			2
Finnish Communications Regulatory Authority				2		2

Population Register Centre				2		2
Municipality of Janakkala		1				1
Finnish Transport and Communications Agency					1	1
Metsähallitus (Finnish Forest Administration)					1	1
Council for Crime Prevention		1				1
City of Vaasa					1	1
National Enforcement Authority Finland			1			1
TOTAL (15 public agencies)	1	2	8	43	15	69