



# GMS Flash Alert

Immigration Edition

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## Finland – COVID-19: More Gradual Lifting of Travel Restrictions, Cross-Border Movement

On 10 July, Finland’s government made a decision regarding the further dismantling of entry restrictions starting 13 July<sup>1</sup>.

The travel restrictions at the Schengen area’s internal borders will be lifted between Finland and certain other countries that have similar epidemiological situations and whose internal border controls have already been lifted.<sup>2</sup> Currently, countries that fall under this definition include: The Netherlands, Belgium, Italy, Austria, Greece, Malta, Germany, Slovakia, Slovenia, Hungary, Liechtenstein, and Switzerland. (For related coverage, see GMS [Flash Alert 2020-305](#), 7 July 2020.)

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### WHY THIS MATTERS

The lifting of travel restrictions from 13 July will allow employers to welcome new employees for already-agreed-upon roles/positions. Projects that have been pending or delayed for reason of, for example, lacking key team members, may now finally be initiated or resumed. This is also thanks to the resumed processing of residence permit applications at Finnish missions.

Nevertheless, the existing threat of the so-called “second wave” of COVID-19 and the continued restrictions for travel from countries with a more difficult epidemic situation will still make the operating environment challenging and uncertain for many companies.

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### Timeline of Restrictions

The Finnish government announced its preliminary decisions concerning restrictions to the country’s borders due to the spread of COVID-19 on 16 March (see previous coverage in GMS [Flash Alert 2020-076](#), 19 March 2020). The first announcement covered the initial period of 19 March until 13 April. The government announced further tightening and extension of the restrictions for traffic across Finland’s borders on 7 April 2020 (see GMS [Flash Alert 2020-179](#), 17 April 2020) and the restrictions were, at the time, prolonged until 13 May. As for the necessary traffic, the list of critical

occupations introduced by The Ministry of Economic Affairs and Employment was also adopted on 7 April. The tasks listed are characterised as critical to the security of the supply chain or for the specific industry.

Furthermore, on 7 May, the Finnish government decided on the gradual lifting of restrictions on border traffic (see GMS [Flash Alert 2020-222](#), 7 May 2020). As of 14 of May, the statutory restrictions on border traffic were lifted on cross-border traffic across the Schengen area's internal borders by allowing employment or commission-related commuting and other essential traffic. Border controls were, at the time, extended for all internal and external borders until 14 June.

The latest previous update was on 15 June when Finland lifted some restrictions on border traffic for travel from six adjacent countries, including Norway, Denmark, Iceland, Estonia, Latvia, and Lithuania (see GMS [Flash Alert 2020-279](#), 15 June 2020).

At the time, the rest of the restrictions were extended until 14 July; however, the new rules are now set to apply already from 13 July.

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## KPMG NOTE

The restrictions on entry since late March 2020 have had a considerable impact on planned assignments and hires from outside Finland. The gradual opening up of the borders has enabled Schengen-internal traffic for work since 14 May. (For prior coverage, see GMS [Flash Alert 2020-305](#), 7 July 2020.) Third-country nationals have also been able to arrive with a valid residence permit since the beginning of May. However, business travel from third countries and tourism have been restricted and even the exempted travellers have been required to present additional documentation e.g., an employment contract.

The suspension of services offered at Finnish missions for residence permit application submissions has further complicated hires from outside the European Union.

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## Steps Taken by the European Union

The Council of the European Union approved on 30 June a recommendation ("green list") on the lifting of restrictions on border traffic for non-EU countries<sup>3</sup>. The Finnish government's implementation plan follows that recommendation to a certain extent, but has a stricter approach: in addition to being on the green list, the third countries that have opened up need to fulfill certain set criteria: new infections in the country on the list should not exceed 8 per 100,000 persons over the course of the previous two weeks.<sup>4</sup>

## More Details on Border Openings and Restrictions

Border controls were already abolished in June for traffic between Finland and Norway, Denmark, Iceland, Estonia, Latvia, and Lithuania – and this continues to be the case.

For those countries for which internal border controls continue, there are some exceptions, including return traffic, commuting, and other essential traffic.

In terms of travel from outside Schengen (external borders), unrestricted travel will be permitted from Cyprus, Ireland, Andorra, San Marino, and the Vatican. In addition, travel for work and other essential purposes from 11 non-European countries will be permitted for residents of those countries. The countries include Algeria, Australia, Georgia, Japan,

New Zealand, Rwanda, South Korea, Thailand, Tunisia, Uruguay, and the People's Republic of China "(provided that reciprocity is confirmed in the EU).

Apart from the entry rules, Finnish missions abroad have partially resumed their acceptance of residence permit applications submitted for purposes of processing<sup>5</sup>. The situation varies considerably depending on the mission and the state of the epidemic in each location. Some missions have been able to start to receive and process all residence permit applications, others, however, on a limited basis (e.g., focusing only on employment- or family-related applications). Furthermore, some missions will only be able to resume the acceptance of applications at some later stage. The information currently needs to be checked separately for each mission and missions may adopt new policies at short notice.

## Allowed Border Traffic

As of 13 July, based on the current development of the epidemic, travel to Finland is expected to be possible for the following groups of travellers<sup>6</sup>:

- Finnish nationals and their family members;
- Nationals of EU and Schengen countries residing in Finland and their family members;
- Those coming from Norway, Denmark, Iceland, Estonia, Latvia, and Lithuania;
- Those coming from The Netherlands, Belgium, Italy, Austria, Greece, Malta, Germany, Slovakia, Slovenia, Hungary, Liechtenstein, and Switzerland;
- Those coming from Cyprus, Ireland, Andorra, San Marino, and the Vatican;
- Third-country nationals who have a valid residence permit granted by the Finnish authorities;

Travel will also be permitted in the following cases:

- Travel across other Schengen internal borders and from the United Kingdom for employment or commission-related commuting;
- Travel from Algeria, Australia, Georgia, Japan, New Zealand, Rwanda, South Korea, Thailand, Tunisia, Uruguay, and China "(provided that reciprocity is confirmed in the EU) for work and other essential purposes for residents of these countries;
- Essential travel in order to work and other essential traffic (as defined and substantiated).

It is important to note that the authorities update the list of countries based on developments in the epidemic situation in the various countries. The Finnish government will review the rules on border restrictions in two weeks' time. Based on the information shared by the government, the next changes in border traffic are scheduled to enter into force on 27 July. Restrictions may also be re-introduced if the epidemic situation in a given country significantly deteriorates.

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## KPMG NOTE

The KPMG International member firm in Finland continues to monitor these matters closely, as further instructions can be expected from the authorities in the forthcoming days to clarify the newly-introduced measures.

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## FOOTNOTES:

- 1 [News release](#) from the government: *Government decision on border traffic restrictions from 13 July.*
- 2 [News release](#) from the government: *Government updates policies on internal border control and travel restrictions (in English).*
- 3 [European council press release](#): *Council agrees to start lifting travel restrictions for residents of some third countries.*
- 4 2 [News release](#) from the government: *Government updates policies on internal border control and travel restrictions (in English).*
- 5 [Ministry for Foreign Affairs of Finland Press Release](#): *Limited reception of residence permit applications to resume in Finnish missions abroad.*
- 6 See (in English) "Finnish Border Guard Instructions for Entry to Finland in Accordance with the Government's Decision of 10.7.2020" at: [https://www.raja.fi/current\\_issues/guidelines\\_for\\_border\\_traffic](https://www.raja.fi/current_issues/guidelines_for_border_traffic) .

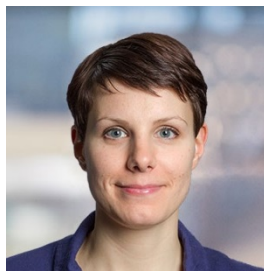
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