

GMS Flash Alert

Immigration

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Finland – Reassessment of Citizenship Status and Definition of National Travel Document

On 5 September 2025, the Finnish Immigration Service (*Maahanmuuttovirasto* or “Migri”) announced a review of its policy concerning the types of travel documents accepted for residence permit applications.¹ The review responds to recent developments and feedback regarding the practical challenges faced by applicants who hold alternative travel documents, such as alien passports, refugee travel documents, or who are stateless.

Following its reassessment, on 3 October 2025, Migri has adopted a new interpretation regarding what constitutes a “national travel document”.² According to the agency, a national travel document under the “Aliens Act” (*Ulkomaalaislaki*) must be technically reliable and originate from the individual’s country of nationality. This means that the issuing state must recognise the individual as its citizen based on its own laws. However, the “Citizenship Act” (*Kansalaisuuslaki*) does not require that the state itself be officially recognised for a person to be regarded as a citizen of that state.

WHY THIS MATTERS

The new interpretation enables certain individuals to apply for a residence permit in Finland without having to worry about their application’s auto refusal for not meeting the “valid travel document” requirement. For instance, because of the new interpretation, Migri now considers travel documents issued by the Palestinian Authority as acceptable travel documents. However, passports issued by Hamas in Gaza remain excluded.

Context

With this change, Migri’s objective is to protect the rights of foreign nationals from being restricted more than necessary, while maintaining the integrity of the identity verification processes. The agency also stated that the primary objective of the legislation is to strengthen reliable identification of applicants, rather than to exclude individuals due to technical interpretations of their nationality status.³

More Details

This reassessment follows concerns raised by the Ministry for Foreign Affairs and the Ministry of the Interior after legislative changes introduced in September 2024 tightened the requirements for residence permits, requiring applicants to hold a valid national travel document. The earlier interpretation excluded stateless individuals, including Palestinians, from meeting this requirement, as they were not recognised as holding a “national” passport.⁴

KPMG INSIGHTS

Migri’s policy review broadens the scope of acceptable documents while maintaining compliance with existing legislation.

KPMG Finland estimates that these changes may reduce the number of negative decisions and appeals. This change is also expected to have a positive impact on employers by reducing administrative uncertainty in residence permit processes for individuals holding Palestinian Authority travel documents.

Additionally, Palestinian nationals who applied for a residence permit with their Palestinian passport and received a negative decision during the period 1 September 2024 to September 2025, can now reach out to Migri for a re-evaluation of their residence permit application.⁵

FOOTNOTES:

1 *Maahanmuuttovirasto/Migrationsverket/Finnish Immigration Service* (in English), [“Finnish Immigration Service to review its policy on which travel documents can be accepted for a residence permit application,”](#) (published on 5.9.2025) (also available in Swedish and Finnish at the noted link).

2 *Maahanmuuttovirasto/Migrationsverket/Finnish Immigration Service* (in English), [“Determination of citizenship status and definition of national travel document for residence permit applications reviewed by Finnish Immigration Service”](#) (3.10.2025) (also available in Swedish and Finnish at the noted link).

3 Ibid.

4 *Maahanmuuttovirasto/Migrationsverket/Finnish Immigration Service* (in English), [“Information about stricter requirements for issuing residence permits”](#) (30.8.2024) (also available in Swedish and Finnish at the noted link).

5 *Maahanmuuttovirasto/Migrationsverket/Finnish Immigration Service* (in English), [“Finnish Immigration Service accepts passports issued by Palestinian Authority for residence permit applications”](#) (3.10.2025) (also available in Swedish and Finnish at the noted link).

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