UNOFFICIAL TRANSLATION

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Government resolution on the guidelines for restricting the entry of citizens of the Russian Federation to safeguard Finland's international relations

1. Background

The Russian invasion of Ukraine that started in February 2022 has changed the security situation in Europe. In accordance with the preparatory discussion by a joint meeting of the President of the Republic and the Ministerial Committee on Foreign and Security Policy, the Government stated in its resolution of 29 September 2022 that the entry of citizens of the Russian Federation into Finland and transit to other Schengen States through Finland poses a threat to Finland's international relations. For this reason, the Government considered it necessary to restrict the entry of citizens of the Russian Federation into Finland at Finland's external border. Following the favourable position of the President of the Republic and Ministerial Committee on Foreign and Security Policy, the Government of Petteri Orpo renewed the resolution on 6 July 2023.

On Friday 6 November 2026, the President of the Republic and Ministerial Committee on Foreign and Security Policy stated that the non-essential entry of citizens of the Russian Federation into Finland poses a threat to Finland's international relations and recommended that the Government would amend the resolution that was renewed on 6 July 2023.

Under Article 6(1)(e) of the Schengen Borders Code (Regulation of the European Parliament and of the Council (EU) 2016/399), the entry conditions for third-country nationals for intended stays on the territory of the Member States of a duration of no more than 90 days in any 180-day period, which entails considering the 180-day period preceding each day of stay, are the following: they are not considered to be a threat to public policy, internal security, public health or the international relations of any of the Member States, in particular where no alert has been issued in Member States' national data bases for the purposes of refusing entry on the same grounds. Section 11, subsection 1, paragraph 5 of the Aliens Act (301/2004) lays down provisions on conditions for entry corresponding to the Schengen Borders Code.

Under Article 32(1)(a)(vi) of the EU Visa Code (Regulation of the European Parliament and of the Council (EC) No 810/2009), without prejudice to Article 25(1), a visa shall be refused if the applicant is considered to be a threat to public policy, internal security, public health or to the international relations of any of the Member States, in particular where an alert has been issued in Member States' national databases for the purpose of refusing entry on the same grounds.

The entry of citizens of the Russian Federation into Finland or transit to other countries through the territory of Finland for non-essential purposes poses a threat to Finland's international relations, particularly with Ukraine and with those EU Member States that share a land border with Russia, and with respect to Schengen cooperation. Estonia, Latvia, Lithuania and Poland had already restricted non-essential travel of Russian citizens before the Government resolution adopted in 2022, as they assessed the entry of Russian citizens into their countries posing a threat to their internal security. The non-essential travel of Russian citizens through Finland to other parts of Europe could pose a threat

to the security of these Schengen States. The restrictions on entry into Estonia, Latvia, Lithuania and Poland are still in force. Czechia and Norway have also put similar national restrictions in place. It is important for Finland to work towards a coherent approach with the other EU and Schengen countries bordering Russia, while also pursuing common approaches at the EU and Schengen levels.

Finland has the longest land border with Russia in the Schengen area. There is particular trust and expectation towards Finland that the external border of the EU, the Schengen area and NATO will hold and that access to the Schengen area through that border will be monitored closely. This trust could be jeopardised if Finland were to allow non-essential entry by Russian citizens into Finland and transit through Finland to other parts of the Schengen area. The restrictions on non-essential entry by Russian citizens are also crucially connected to Finland's relations with Ukraine, which Russia is waging a war of aggression against. Ukraine has requested that Finland restrict non-essential entry of Russian citizens.

The government resolution that was issued in 2022 and renewed in 2023 includes guidelines for restricting the entry of Russian citizens into Finland. These guidelines include ten special groups that it is justified to pay particular attention to when considering issuing a visa and assessing the conditions for allowing entry. Granting a visa to persons covered by these groups may be considered and their entry into Finland allowed on a case-by-case basis.

The third special group listed in the guidelines of the government resolution has included persons that may be coming to Finland for short-term work under a visa, lasting up to 90 days. Due to recent decisions made by international organisations there is a growing risk that this special group could include persons who may seek to disseminate narratives in Finland supporting Russia's war of aggression. This would be detrimental to Finland's country image and could lead to erroneous impressions of Finland's Russia policy and support for Ukraine. As Russia's war of aggression continues and its hybrid activities intensify also in the territory of EU Member States, the entry of such persons into Finland or transit through Finland to other parts of the Schengen area would pose a threat to Finland's international relations. This is particularly the case with respect to Ukraine, but as stated above, also with respect to, for example, those EU and Schengen countries that have imposed severe restrictions on the entry of Russian citizens into their territory.

In placing restrictions on entry, the EU Member States that share a land border with Russia have created new state practices and made new interpretations of Schengen practices. Finland's actions and status as an EU and Schengen country at the Russian border are a part of this. Decisions by the Finnish Border Guard to remove Russian citizens from the country or revoke their visas under the government resolution have been appealed against to more than one administrative court. The administrative courts have mainly rejected these appeals and upheld the decisions made in accordance with the guidelines of the resolution.

The threat to Finland's international relations cannot be assessed at border checks, in the monitoring of foreign nationals or in the processing of visa applications by the authorities with respect to individual travellers. This is a question of entry into Finland for non-essential purposes and the use of Finland as a transit country on the whole, and how this affects Finland's international relations.

Since September 2022, Finland has systematically and actively emphasised the importance of EU-level measures to restrict the entry of Russian citizens into the Schengen area. So far, EU-level measures have not progressed in all respects. The European Union suspended its visa facilitation agreement

with Russia partly on 25 February 2022 and fully as of 12 September 2022. In September 2022, the European Commission issued two sets of guidelines concerning the issuance of visas to Russian citizens. On 6 November 2025, the Commission issued an implementing decision that restricted the issuance of multiple-entry visas to Russian citizens. The European Council conclusions from 15–16 October 2026 mention reviewing and tightening visa requirements and policy regarding Russian nationals. However, no EU-level decision has yet been made on wider restrictions to non-essential travel of Russian citizens to the Schengen area. According to the EU Visa Strategy (29 January 2026), the Commission is considering a revision of the EU Visa Code, which would introduce restrictive visa measures, such as the suspension of visa issuance, if relations with a third country deteriorate severely.

2. Government resolution on the guidelines for restricting the entry of citizens of the Russian Federation to safeguard Finland's international relations

In accordance with the position of the President of the Republic and the Ministerial Committee on Foreign and Security Policy, the Government maintains that non-essential entry of citizens of the Russian Federation into Finland and their transit to other Schengen States through Finland pose a threat to Finland's international relations. For this reason, the Government considers it necessary to continue to restrict the entry of citizens of the Russian Federation into Finland. Through this amended resolution, the Government maintains its aim to remove the threat to Finland's international relations posed by the entry and transit of Russian citizens for non-essential purposes. These restrictions are based on the conditions for entry laid down in Article 6(1)(e) of the Schengen Borders Code and on section 11, subsection 1, paragraph 5 of the Aliens Act. Under these provisions, the entry of a third-country national into the country and the short-term stay of a third-country national in the country require that the third-country national is not considered a threat to the international relations of any of the Member States. The Schengen Borders Code allows Member States leeway for making national decisions and policies that take into account factors such as international relations and security. The restrictions are also based on Article 32(1)(a)(vi) of the EU Visa Code, pursuant to which, without prejudice to Article 25(1), a visa shall be refused if the applicant is considered to be a threat to public policy, internal security, public health or to the international relations of any of the Member States.

Due to the above, it is necessary for the Government to amend the resolution renewed on 6 July 2023 and the guidelines therein that, in the Government's view, should be taken into account when assessing the conditions for entry and short-term stay of citizens of the Russian Federation, issuing visas and assessing the conditions for the validity of visas. The resolution covers both non-essential entry into Finland and transit to other Schengen countries through Finland.

The resolution that was renewed in 2023 is hereby clarified and amended by limiting the third special group listed in the guidelines of the resolution to cover only persons coming to Finland for short-term work (lasting up to 90 days) under a visa, when this is deemed essential for Finland's national interest, such as security of supply. The restrictions defined in the guidelines included in this resolution are in force regardless of the country from where a Russian citizen is travelling to Finland or through Finland to other parts of the Schengen area.

Under the Schengen Borders Code, the border authorities are responsible for assessing the conditions for entry in connection with border checks for each individual person entering the country. Under the provisions of the Aliens Act, the assessment of the conditions for entry and short-term stay is carried out by the Finnish Border Guard or police in connection with the monitoring of foreign nationals.

According to Article 14(2) of the Schengen Borders Code, entry may only be refused by a substantiated decision stating the precise reasons for the refusal. The decision is made by the border authority competent under national law. Article 4 of the Schengen Borders Code shall be complied with when making the decision. Sections 142 and 148 of the Aliens Act lay down provisions on denial of admittance or stay in situations where a person does not meet the conditions for entry and stay. Denial of admittance or stay shall comply with the overall consideration laid down in section 146 of the Aliens Act.

The Government considers it important that strong restrictions continue to be placed on the reception of visa applications to secure the legitimate expectations of visa applicants. In the Government's view, the activities of the authorities should not create unfounded expectations for entry in situations where the conditions for entry are not met. As non-essential travel to Finland by citizens of the Russian Federation is being restricted, it is justified for the Foreign Service, as the competent visa authority, to take this into account when considering refusing a visa under Article 32 of the Visa Code and when considering annulling or revoking a visa under Article 34 of the Visa Code.

However, the implementation of the guidelines below must not prevent entry or short-term stay that is necessary from the perspective of fundamental rights, such as family or health-related reasons. Furthermore, the resolution must not prevent entry or short-term stay when it is deemed necessary for humanitarian reasons, for national interests or for meeting Finland's international obligations. In such cases, a visa with limited territorial validity referred to in Article 25 of the Visa Code may also be considered, if necessary.

This resolution does not affect the rights of asylum seekers or the powers of the competent authorities. The guidelines now being confirmed apply to entry under a visa for a short stay of no more than 90 days over a period of 180 days. The guidelines do not affect the right to seek international protection or the entry or stay of holders of residence permits issued by the Schengen States and other EU Member States or holders of comparable national permits.

<u>Guidelines adopted by the Government for restricting the entry:</u>

In accordance with the position of the President of the Republic and the Ministerial Committee on Foreign and Security Policy, the Government deems that the entry of citizens of the Russian Federation into the territory of Finland for non-essential purposes or their transit through the territory of Finland to other Schengen States poses a threat to Finland's international relations that, in the Government's view, should be taken into account when assessing the conditions for entry and short-term stay of citizens of the Russian Federation, when issuing visas and when assessing the conditions for the validity of visas.

When considering whether to issue a visa and when assessing the conditions for allowing entry and short-term stay, it is justified to pay particular attention to the following special groups:

1. Family members of Finnish citizens and foreign nationals who reside permanently in Finland (spouses, parents, grandparents, children, grandchildren, dependants and persons applying for a visa and entering the country on the basis of an established relationship) in connection with travel into Finland;

2. Family members of citizens of a Member State of the European Union, a Member State of the European Economic Area or the Swiss Confederation as referred to in Directive 2004/38/EC;

3. Persons coming to Finland for short-term work (lasting up to 90 days) under a visa, when the short-term work is deemed essential for Finland's national interest, such as Finland's security of supply;

4. Transport and logistics personnel travelling to Finland for their work duties;

5. Business travellers travelling to Finland for an essential business purpose that requires their personal presence;

6. Students coming to Finland for short-term studies (lasting up to 90 days) leading to a degree or completed as part of a degree, including taking an entrance exam or aptitude test;

7. Persons whose entry into the country is based on an established doctor-patient relationship in a care institution located in Finland;

8. Persons who owned a residence or real estate in Finland before 30 September 2022 insofar as the purpose of the visit is essential and urgent maintenance or servicing of the residence or real estate, requiring the personal presence of the owner;

9. Members of the diplomatic and consular missions of the Russian Federation who are accredited to or sent to Finland and their family members, diplomatic couriers, and members of the diplomatic and consular missions of the Russian Federation who use the territory of Finland on transit journeys for the purpose of carrying out their official duties and their family members;

10. Other persons travelling for special reasons based on individual consideration.

The Finnish Border Guard provides guidance on allowing the entry of persons belonging to the special groups above in accordance with the guidelines laid down in this resolution.

The Ministry for Foreign Affairs provides guidance to Finnish missions abroad on visa applications of citizens of the Russian Federation in accordance with the guidelines laid down in this resolution.

The guidelines laid down in this resolution will be applied as of 16 November 2026. The guidelines will remain in force until further notice. The Government will closely monitor the impacts of the resolution and the development of the situation and, if necessary, update the guidelines.