

12 November 2025

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the third payment request submitted by Finland on 30 September 2025, transmitted to the Economic and Financial Committee by the European Commission

Executive summary

In accordance with Article 24(2) of Regulation (EU) 2021/241, on 30 September 2025, Finland submitted a request for payment for the third instalment of the non-repayable support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Finland provided due justification of the satisfactory fulfilment of the 22 milestones and targets of the third instalment of the non-repayable support, as set out in Section 2.1 of the Council Implementing Decision of 29 October 2021 on the approval of the assessment of the recovery and resilience plan for Finland¹.

In its payment request, Finland has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary. Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Finland, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 22 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Finland's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, the entry into force of the amended Nature Conservation Act, the integration of digital functionalities as next step towards the implementation of the Nordic Employment Service Model and the completion of a medium-term foresight model for labour and competence needs. The milestones and targets also confirm progress towards the completion of investment projects related to new energy technologies, re-use and recycling of materials, climate-resilience and RDI projects, which include initiatives aiming at increasing competences in key sectors and improving national and local research infrastructures to strengthen Finland's competitiveness.

By the transmission of this positive preliminary assessment and in accordance with Article 24(4) of Regulation (EU) 2021/241, the Commission asks for the opinion of the Economic and Financial Committee on the satisfactory fulfilment of the relevant milestones and targets.

¹ ST 12524/21; ST 12524/21 ADD 1 as amended by ST 6991/23; ST 6991/23 ADD 1, ST 15836/23; ST 15836/23 ADD 1, ST 11535/24; ST 11535/24 ADD 1; ST 11030/25; ST 11030 ADD 1.

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Non-repayable support

Number and name of the Milestone: 7 - Award of all grants for energy technology investments

Related Measure: P1C1I2 – Transformation of the energy system – Investments in new energy technologies

Qualitative Indicator: Notification of the award of all grants for energy technology investments

Time: Q4 2023

1. Context:

The objective of this investment is to stimulate the introduction of new clean technologies for energy production and use by providing support for large-scale projects in the demonstration phase with a priority on technical feasibility. The investment focuses on offshore wind energy production, renewable fuels in transport, non-combustion heat production to replace the use of coal and other renewable energy projects.

Milestone 7 requires the notification of the award of all grants to the project beneficiaries/applicants selected under the competitive calls for proposals, enabling the start of the implementation of the selected projects.

Milestone 7 is the second milestone of the investment, following the completion of milestone 6 related to the publication of the first call for applications. It will be followed by target 8 which requires the completion of at least four supported projects, corresponding to an increase in new renewable energy capacity and/or storage capacity of at least 112 MW. The investment has a final expected date for implementation by 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone was satisfactorily fulfilled
2	Call for applications	Copy of the second call for applications on the website of Ministry of Economic Affairs and Employment, published on 29 January 2024 (also available online: https://tem.fi/en/fourth-application-round-for-energy-investment-aid)
3	Application instructions accompanying the first call for applications	Copy of the application instructions ("terms of reference") for the second call for applications on the website of Ministry of Economic Affairs and Employment, published on 29 January 2024 (also available online: https://tem.fi/en/fourth-application-round-for-energy-investment-aid)
4	Guidelines for the processing of applications	Guidelines for the processing of applications issued by the Ministry of Economic Affairs and Employment to the project assessors
5	List of all selected projects	List of all projects funded by the Ministry of Economic Affairs and Employment under measure P1C1I2
6-19	Copies of funding memos	Copies of the funding memos issued by the Ministry of Economic Affairs and Employment to the successful applicants, showing that the assessment and selection of

20-33	Copies of funding decisions	projects comply with the milestone requirements Copies of the funding decision (grant award notifications) issued by the Ministry of Economic Affairs and Employment, evidencing the successful applicant, date and reference of the document
34-47	Screenshots of notifications	Screenshots of the notifications of the funding decisions by the Ministry of Economic Affairs and Employment on the basis of on-the-spot checks performed on 12 September 2025

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

The selection of all projects related to new energy technologies shall be carried out in accordance with the criteria set out in the respective calls for proposals.

The Ministry of Economic Affairs and Employment launched a total of two calls for applications under this measure. The first call for applications, published on 20 December 2021, was already assessed as part of milestone 6 in Finland's first payment request. The Ministry published an additional call on 29 January 2024. Finland has provided a copy of the publication of this additional call for proposals (item 2 of the evidence list), as well as the terms of reference ("application instructions", item 3 of the evidence list) for this second call.

Finland has provided copies of the funding decisions (items 20-33 of the evidence list) and the funding memos issued by the Ministry of Economy and Employment to the successful applicants (items 6-19 of the evidence list) for the 14 projects selected under this measure. The "justification for funding" section of each funding decision contains confirmation that the projects comply with the criteria of the respective call for proposals, while the funding memos contain a project-level DNSH assessment carried out by the Ministry of Economic Affairs and Employment (included in the section "Environmental objectives of RRF funding" of the document). Moreover, the funding memos contain a further confirmation that the assessment of applications has been carried out according to the criteria of the respective call for applications (in each case on page 1 of the funding memo, in the section titled "Basis of application"). Finland has also provided the Guidelines for the processing of applications (item 4 on the evidence list), which includes the criteria followed during the assessment of the applications. These guidelines specify the eligibility and selection criteria included in the calls for applications that need to be followed in the assessment, including on page 21-23 of the document the criteria referred to in the description of milestone 6 (compliance of the selected projects with the 'Do no significant harm' Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation).

While the funding decisions and funding memos do not contain a direct reference to the individual call under which the projects were selected, they do contain the name of the programme and the name of the RRF measure under which the calls were opened as well as the date of the application (in the section titled "Initiation and processing of the case"). Each applicant has a unique identifier, which, in addition to the dates included in the documents, is referenced both in the funding decisions and the funding memos. The combination of these dates included in the funding decisions and the funding memos with the official opening dates of the calls for applications provides a direct link between each project and the call under which it was selected. Moreover, Finland has provided a list of all selected projects (item 5 of the evidence list) which shows under which call each of the 14 projects were selected.

All calls shall be based on the eligibility/selection criteria indicated in milestone 6.

The eligibility/selection criteria indicated in milestone 6 require the terms of reference of the call to include eligibility criteria that ensure that the selected projects comply with the 'Do no significant harm' Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation. Section 4.2 of the application instructions for the second call for applications (item 3 of the evidence list; pages 4-7) includes the same text in the eligibility criteria as the first call, which was assessed under milestone 6 as part of the first payment request. This section prescribes that every project financed under the support programme must comply with the Do no significant harm Technical Guidance. The same section also prescribes that projects selected under these calls may not be included on the exclusion list and must comply with EU and national environmental legislation. The exclusion list described in the Council Implementing Decision is replicated in both call instruction documents, including the following categories: (i) activities related to fossil fuels, including downstream use; (ii) activities under the EU Emissions Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks; (iii) activities related to waste landfills, incinerators and mechanical biological treatment plants; and (iv) activities where the long-term disposal of waste may cause harm to the environment. The call instructions also include the footnotes included in the Council Implementing Decision related to the exclusion list.

All funding award decisions shall be awarded to the project beneficiaries/applicants selected under the competitive calls for proposals, enabling the start of the implementation of the selected projects. Furthermore, the qualitative indicator of the milestone in the Council Implementing Decision requires the funding award decisions to be notified to the project beneficiaries.

Finland has provided copies of the funding award decisions ("funding decisions") for the 14 selected projects (items 20-33 of the evidence list). Section 4 of each grant award notification confirms the starting date of the projects. The Commission services conducted an on-the-spot check on 12 September 2025 to verify that the notification to the project beneficiaries of the awards of all grants had effectively taken place. The check was performed on the internal grants management IT platform (EVAL) used by the authority granting the aid, i.e. the Ministry of Economic Affairs and Employment. The Finnish authorities presented the EVAL online data for each of the 14 selected projects with the specific steps leading to the notification of the award. The processual information demonstrated included the notification of the award decision to the project beneficiary for each project. The notification consists of an alert on the availability of the award decision on the EVAL platform, sent to the project beneficiary through the EVAL service platform. The final step of the notification process on the EVAL system for each award is indicated on a specific log page. This processual step and its screen view do not contain confidential business data, and the relevant screenshots were therefore shared also electronically to the Commission services as separate screenshots for each award/project beneficiary. This information is included by Finland in the third payment request documentation in FENIX (items 34-47 on the evidence list).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 20 - Award of all grants for direct electrification and low-carbon industrial processes projects

Related Measure: P1C2I2 – Industrial reforms and investments supporting the green and digital transition – Direct electrification and decarbonisation of industrial processes

Qualitative Indicator: Notification of the award of all grants

Time: Q4 2023

1. Context:

The objective of this investment is to promote the direct electrification and low-carbon industrial processes to reduce CO2 emissions in the industrial sector. The measure aims both at improving energy efficiency in industry by replacing fossil fuels with electricity in heat generation and at introducing hybrid solutions and utilising heat pump technology and surplus heat.

Milestone 20 requires the notification of the award of all grants to the project beneficiaries/applicants selected under the competitive calls for proposals, enabling the start of the implementation of the selected projects.

Milestone 20 is the second milestone of the investment, following the completion of milestone 19 related to the publication of the first call for applications. It will be followed by target 21 which requires the completion of at least three supported projects, corresponding to an increase in the level of electrification in industrial processes by at least 43 MW. The investment has a final expected date for implementation of 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone was satisfactorily fulfilled
2	Second call for applications	Copy of the call for applications on the website of Ministry of Economic Affairs and Employment, published on 15 March 2023 (also available online: https://tem.fi/en/second-application-round-for-energy-investment-aid)
3	Application instructions accompanying the second call for applications	Copy of the application instructions ("terms of reference") on the website of Ministry of Economic Affairs and Employment, published on 15 March 2023 (also available online: RRF-energiainvestointituen hakuohjeet)
4	Third call for applications	Copy of the call for applications on the website of Ministry of Economic Affairs and Employment, published on 13 October 2023 (also available online: https://tem.fi/en/third-application-round-for-energy-investment-aid)
5	Application instructions accompanying the third call for applications	Copy of the application instructions ("terms of reference") on the website of Ministry of Economic Affairs and Employment, published on 13 October 2023 (also available online: RRF tukiohje)
6	List of selected projects by the Ministry of Economic Affairs	List of all projects funded by the Ministry of Economic Affairs and Employment under measure P1C2I2

7-23	Copies of funding memos by the Ministry of Economic Affairs and Employment	Copies of the funding memos issued to the successful applicants for those projects selected by the Ministry of Economic Affairs and Employment, showing that the assessment and selection of projects comply with the milestone requirements
24-40	Copies of funding decisions by the Ministry of Economic Affairs and Employment	Copies of the funding decision (grant award notifications) issued to the successful applicants for those projects selected by the Ministry of Economic Affairs and Employment, evidencing the successful applicant, date and reference of the document
41	List of selected projects by Business Finland	List of all projects funded by Business Finland under measure P1C2I2
42-46	Copies of grant award notifications by Business Finland	Copies of the grant award notifications issued to the successful applicants for those projects selected by Business Finland, evidencing the successful applicant, date and reference of the document
47-51	Copies of funding memos by Business Finland	Copies of the funding memos issued to the successful applicants for those projects selected by Business Finland, showing that the assessment and selection of projects comply with the milestone requirements
52	Guidelines for the processing of applications	Guidelines for the processing of applications issued by the Ministry of Economic Affairs and Employment to the project assessors
53-69	Screenshots of notifications	Screenshots of the notifications of the funding decisions by the Ministry of Economic Affairs and Employment on the basis of on-the-spot checks performed on 12 September 2025

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

The selection of all direct electrification and low-carbon industrial processes projects shall be carried out in accordance with the criteria of the respective calls for proposals.

The Ministry of Economic Affairs and Employment has launched a total of three calls for applications under this measure. The first call for applications, published on 20 December 2021, was assessed as part of milestone 19 in Finland's first payment request. Finland has provided copies of the publication of the two additional calls for proposals, as well as the terms of reference ("application instructions") for these calls, for investment projects promoting the electrification and decarbonisation of industrial processes. These two additional calls were published on 15 March 2023 (items 2 and 3 of the evidence list) and 13 October 2023 (items 4 and 5 of the evidence list).

Finland has provided copies of the funding decisions and grant award notifications for the 22 projects selected under this measure (items 24-40 of the evidence list are funding decisions issued by the Ministry of Economic Affairs and Employment and items 42-46 of the evidence list are grant award notifications issued by Business Finland). The "justification for funding" section of these documents contains confirmation that the projects comply with the criteria of the respective call for proposals as well as a project-level DNSH assessment carried out by the Ministry of Economic Affairs and Employment (items 24-40 of the evidence list) or Business Finland (items 42-46 of the evidence list). Moreover, the funding memos (items 7-23 of the evidence list issued by the Ministry of Economic Affairs and Employment and items 47-51 of the evidence list issued by Business Finland)

contain further confirmation that the assessment of applications has been carried out according to the criteria of the respective call for applications (in each case on page 1 in the section titled “Basis of application”). Finland has also provided the Guidelines for the processing of applications (item 52 on the evidence list), which includes the criteria followed during the assessment of the applications. These guidelines specify the eligibility and selection criteria included in the calls for applications that need to be followed in the assessment, including on page 21-23 of the document the criteria referred to in the description of milestone 19 (compliance of the selected projects with the ‘Do no significant harm’ Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation).

While the grant award notifications, funding decisions and funding memos do not contain a direct reference to the individual call under which the projects were selected, they do contain the name of the programme and the name of the RRF measure under which the calls were opened as well as the date of the application (in the section titled “Initiation and processing of the case”). Each applicant has a unique identifier, which, in addition to the dates included in the documents, is referenced both in the funding decisions/grant award notifications and the funding memos. The combination of these dates included in the funding decisions/grant award notifications and the funding memos with the official opening dates of the calls for applications provides a direct link between each project and the call under which it was selected. Moreover, Finland has provided a list of all selected projects by the Ministry of Economic Affairs (item 6 of the evidence list) and a list of all selected projects by Business Finland (item 41 of the evidence list) which shows under which call each of the 22 projects were selected.

All calls shall be based on the eligibility/selection criteria indicated in milestone 19.

The eligibility/selection criteria indicated in milestone 19 prescribe that the terms of reference of the call shall include eligibility criteria that ensure that the selected projects comply with the ‘Do no significant harm’ Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation. Section 4.2 of the applications instructions for the second call for applications (item 3 of the evidence list; pages 5-8) and section 4.2 of the application instructions of the third call for applications (item 5 of the evidence list; pages 4-7) include the same text in the eligibility criteria, which prescribe that every project financed under the support programme must comply with the Do no significant harm Technical Guidance. The same section also prescribes that projects selected under these calls may not be included on the exclusion list and must comply with EU and national environmental legislation. The exclusion list included in the Council Implementing Decision is replicated in both call instruction documents, including the following categories: (i) activities related to fossil fuels, including downstream use; (ii) activities under the EU Emissions Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks; (iii) activities related to waste landfills, incinerators and mechanical biological treatment plants; and (iv) activities where the long-term disposal of waste may cause harm to the environment. The call instructions also include the footnotes included in the Council Implementing Decision related to the exclusion list.

All funding award decisions shall be issued to the project beneficiaries/applicants selected under the competitive calls for proposals, enabling the start of the implementation of the selected projects. Furthermore, the qualitative indicator of the milestone in the Council Implementing Decision requires the funding award decisions to be notified to the project beneficiaries.

Finland has provided copies of the funding award decisions (“funding decisions”) for the projects selected by the Ministry of Economic Affairs and Employment (items 24-40 of the evidence list). Section 4 of these funding decisions confirms the starting date of the implementation of the projects. For the grant award notifications issued to the selected beneficiaries by Business Finland (items 42-46 of the evidence list), the section titled “Entry into force of the financing decision”

confirms that these notifications enable the start of the implementation of the projects. The Commission services conducted an on-the-spot check on 12 September 2025 to verify that the notification to the project beneficiaries of the awards of all grants for projects selected by the Ministry of Economic Affairs and Employment had effectively taken place. The check was performed on the internal grants management IT platform (EVAL) used by the authority granting the aid, i.e. the Ministry of Economic Affairs and Employment. The Finnish authorities presented the EVAL online data for each of the 17 selected projects with the specific steps leading to the notification of the award. The processual information demonstrated included the notification of the award decision to the project beneficiary for each project. The notification consists of an alert on the availability of the award decision on the EVAL platform, sent to the project beneficiary through the EVAL service platform. The final step of the notification process on the EVAL system for each award is indicated on a specific log page. This processual step and its screen view do not contain confidential business data, and the relevant screenshots were therefore shared also electronically to the Commission services as separate screenshots for each award/project beneficiary. This information is included by Finland in the third payment request documentation in FENIX (items 53-69 on the evidence list).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 23 - Award of all grants to the re-use and recycling projects

Related Measure: P1C2I3: Industrial reforms and investments supporting the green and digital transition – Re-use and recycling of key materials and industrial side streams

Qualitative Indicator: Notification of the award of all grants

Time: Q4 2023

1. Context:

The objective of this investment is to promote the re-use and recycling of industrial side and waste streams and other key materials such as battery materials, plastics, textiles, packaging, electrical and electronic equipment, construction and demolition materials. The measure provides support for first commercial plants, pilot and demonstration plants, the introduction of new technologies in existing processes, and digital platforms and service investments promoting re-use and recycling.

Milestone 23 requires the notification of the award of all grants to the project beneficiaries/applicants selected under the competitive calls for proposals, enabling the start of the implementation of the selected projects.

Milestone 23 is the second milestone of the investment, following the completion of milestone 22 related to the publication of the first call for applications. It will be followed by target 24 which requires the completion of at least ten supported projects, corresponding to a reduction capacity of at least 45 622 tonnes of CO₂ equivalent. The investment has a final expected date for implementation by 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone was satisfactorily fulfilled
2	Summary by Business Finland regarding assessment of the financed projects	Summary by the responsible authority regarding its assessment of the financed projects against the requirements of each call launched under this measure
3-41	Grant award notifications	Copies of the grant award notifications issued by Business Finland, evidencing the successful application, date and the reference of the document
42	List of projects selected by Business Finland	A list of selected projects under the calls launched under this measure, showing that grants have been awarded to the successful applicants
43-81	Funding memos	Copies of the funding memos issues by Business Finland to the successful applicants, showing that the assessment and selection of projects comply with the milestone requirements
82	Call instructions published on 19 August 2022	Copy of the instructions of the additional call for applications, showing that the eligibility criteria are fully aligned with the description of the milestone in the CID Annex
83	Call instructions published on 14 March 2023	Copy of the instructions of the additional call for applications, showing that the eligibility criteria are fully aligned with the description of the milestone in the CID Annex
84	Call instructions published	Copy of the instructions of the additional call for applications,

	on 10 May 2023	showing that the eligibility criteria are fully aligned with the description of the milestone in the CID Annex
85	Mandatory instructions for assessment	Copy of the mandatory instructions for assessment by Business Finland, showing that the assessment and selection of project comply with the milestone requirements
86	Extract from Business Finland's official reporting database	Extract from Business Finland's official reporting database, showing the date of the applications and the measure

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

The selection of all re-use and recycling of key materials and industrial side streams projects shall be carried out in accordance with the criteria of the respective calls for proposals.

Business Finland has launched a total of five calls for applications under this measure. The first two calls have already been assessed as part of milestone 22 in the first payment request. Finland has provided copies of the terms of reference ("call instructions") of the three additional calls for proposals for investment projects promoting the reuse of waste materials and side streams, which were published on 19 August 2022 (item 82 of the evidence list), 14 March 2023 (item 83 of the evidence list) and 10 May 2023 (item 84 of the evidence list). Finland has provided copies of the funding memos issued by Business Finland for the 39 projects selected under this measure (items 43-81 of the evidence list). The funding memos confirm that the assessment of applications has been carried out according to the criteria of the respective call for proposals. The funding memos contain the name of the project beneficiary and a unique identifier to determine the identity of the applicant. Finland has provided Business Finland's mandatory instructions for assessment for the processing of applications (item 85 on the evidence list), which includes the criteria followed during the assessment of the applications. These guidelines specify the eligibility and selection criteria included in the calls for applications that need to be followed in the assessment. Section 3 on pages 9-10 of this document, "Financing under Finland's recovery and resilience plan (RRF)", instructs the decision makers in Business Finland to apply the criteria in the calls for applications and specifically to ensure selected projects comply with the Do No Significant Harm criteria, exclusion list, emission trading system benchmarks and the criteria included in individual calls. This corresponds to the criteria referred to in the description of milestone 22.

The funding memo includes the date on which the application was submitted by the applicant to Business Finland, thereby linking the project to the specific call for applications that was open on that date. For projects selected under the first two calls for applications, whose opening and closing dates overlap, the "Specific conditions for funding" section of each of the grant award notifications (items 3-41 on the evidence list) clarify whether the project was selected under the call for applications for battery projects or under the call for applications for recycling and reuse projects. Thereby, each of the selected projects can be linked to the specific call under which it was selected. Moreover, Finland has provided an extract from Business Finland's official reporting database (item 86 on the evidence list), listing each application with its submission date and the name of the call it relates to (either "battery industry" or "recycling and reuse"). The grant award notifications contain confirmation that the projects comply with the criteria of the respective call for proposals as well as a project-level DNSH assessment carried out by Business Finland as part of the "Justification for funding" section.

All calls shall be based on the eligibility/selection criteria indicated in milestone 22.

Business Finland has launched a total of five calls for applications under this measure. The first two calls were already assessed as part of milestone 22 in Finland's first payment request. Finland has provided copies of the terms of reference ("call instructions") of the three additional calls for proposals for investment projects promoting the reuse of waste materials and side streams, which were published on 19 August 2022 (item 82 of the evidence list), 14 March 2023 (item 83 of the evidence list) and 10 May 2023 (item 84 of the evidence list). Milestone 22 requires that the terms of reference of the call shall include eligibility criteria that ensure that the selected projects comply with the 'Do no significant harm' Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation. Each of these call instruction documents contains an identical section 3.3 which includes the required reference to compliance with the Do No Significant Harm (DNSH) Technical Guidance through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation. The exclusion list is replicated in this section and includes all activities listed in the description of the measure, namely (i) activities related to fossil fuels, including downstream use; (ii) activities under the EU Emissions Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks; (iii) activities related to waste landfills, incinerators and mechanical biological treatment plants; and (iv) activities where the long-term disposal of waste may cause harm to the environment. The call instructions also include the footnotes included in the Council Implementing Decision related to the exclusion list. Moreover, the same section of this document specifies that for projects covered by the EU ETS, the estimated greenhouse gas emissions must be below the benchmark. The same section in each call instruction also requires that only activities that comply with relevant EU and national environmental legislation are eligible for funding.

All funding award decisions shall be issued to the project beneficiaries/applicants selected under the competitive calls for proposals, enabling the start of the implementation of the selected projects.

Finland has provided copies of the grant award notifications for the 39 selected projects (items 3-41 on the evidence list). These notifications all follow a specific structure, presenting the relevant information to prove the achievement of this element: page 1 of the grant award notifications includes a section with information on the project to be funded, including the name of the successful projects beneficiaries/applicants; the headline of the grant award notifications contain the date of the positive decision by Business Finland as well as the unique identifier of the project. Finland has provided an extract from the Business Finland reporting database (item 86 of the evidence list), which links these unique identifiers to the call type ("battery industry" or "reuse and recycling"), which confirms the link between the project and the call under which it was selected. The issuance of the grant award notifications confirms the award of grants to project beneficiaries and enables the start of the implementation of the selected projects.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 47 - Entry into force of the amended Nature Conservation Act

Related Measure: Environmental sustainability and nature-based solutions – Modernisation of nature legislation

Qualitative Indicator: Provision in the law indicating the entry into force of the amendments to the Nature Conservation Act

Time: Q1 2023

1. Context:

The objective of this reform is to create a legal basis for the national biodiversity strategy and for voluntary nature conservation measures, including restoration and active natural management measures.

Milestone 47 amends the Nature Conservation Act (1096/1996) to respond better to current needs to strengthen biodiversity, to ensure that decision-making takes better account of the preservation of biodiversity outside nature conservation areas and the maintenance of ecosystem services and to enhance the effectiveness of the conservation of habitats and species.

Milestone 47 is the only milestone in this reform. The reform has a final expected date of completion by 31 December 2023.

2. Evidence provided:

Name of the evidence	Short description
1 Summary document	Summary document duly justifying how the milestone was satisfactorily fulfilled
2 Copy of the publication of the Nature Conservation Act 9/2023 in the Statute Book of Finland.	The Nature Conservation Act 9/2023 replaced the Nature Conservation Act 1096/1996 and it includes provisions for the national nature conservation planning including the provisions for national biodiversity strategy, voluntary nature conservation measures, and the conservation of natural habitats outside nature conservation areas. Also available at: https://www.finlex.fi/fi/laki/alkup/2023/20230009?search%5Btype%5D=pika&search%5Bpika%5D=luonnonsuojelulaki (in Finnish) and at https://www.finlex.fi/fi/laki/kaannokset/2023/en20230009 (in English)

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

The legislative amendment to the Nature Conservation Act (1096/1996) shall include:

- the preservation of biodiversity outside nature conservation areas

- the maintenance of ecosystem services Furthermore, in line with the description of the measure, **Finland shall update the Nature Conservation Act (1096/1996) to respond better to current needs in order to strengthen biodiversity.**

The reformed Nature Conservation Act, as evidenced by item 2 in the evidence list, introduces the legal basis for the national biodiversity strategy which before was not regulated in the Finnish legal system.

According to section 13 of the Act the task of formulating the strategy and the action plan to implement the strategy, is vested to the Ministry of the Environment. The Ministry has to cooperate with other ministries and key actors. The strategy is adopted by the Government which can also by government decree define further provisions on the formulation of the National Biodiversity Strategy and Action Plan.

According to section 13 of the Act, the National Biodiversity Strategy sets out the national functional, quantitative and temporal targets for halting biodiversity decline and improving the state of biodiversity. The National Biodiversity Action Plan must specify the measures necessary to implement the National Biodiversity Strategy and shall designate the parties responsible for their implementation and for monitoring the effectiveness of the measures. The Ministry of the Environment is responsible for the monitoring of the National Biodiversity Strategy and Action Plan and reports to the Government on the implementation of the strategy.

The Act also provides legal basis for Regional Biodiversity Implementation Plans. According to the subsection 5 of section 13 the Centres for Economic Development, Transport and the Environment may formulate biodiversity implementation plans concerning the National Biodiversity Strategy and Action Plan referred to in subsection 1 for their respective areas. Sufficient interaction with key actors in the area shall be ensured in the formulation of the implementation plans.

Art. 2 identifies the scope of the Act as general, not specifying any restrictive scope. The Act - and its objective (art. 1) - are therefore generally applicable. To this end, the National Biodiversity Strategy and the Regional Biodiversity Implementation Plans define objective, scope and measures applying to biodiversity outside the nature conservation network and take into account ecosystem services. This approach is further proven by targeted obligation defined by the Act in specific sections concerning nature conservation network as for instance in Chapter 5 – Art 33 and followings - Natura 2000 network or Chapter 6 - Nature reserves.

Furthermore, the Act includes provisions on voluntary offsetting of ecological deterioration outside nature conservation areas. In articles 98-107 of the NCA criteria for offsetting deterioration of nature values are sets out. Any project or activity that causes deterioration can voluntarily be offset according to the provisions of the Act. While these actions are voluntary, a clear legal basis is set and it is expected to have an important effect.

[...] - measures to ensure the effectiveness of the conservation of habitats and species.

Furthermore, in line with the description of the measure, **new measures shall be adopted to enhance the effectiveness of the conservation of habitats and species.**

The Act contains new measures to enhance the conservation of habitats and species. Firstly, the conservation of protected habitats has been extended to cover five additional habitat types compared to the Nature Conservation Act 1096/1996 by section 64 of the Act. These habitats can be protected by a decision of the competent nature conservation authority. Secondly, section 65 of the Act includes provisions on strict protection directly applicable to the most vulnerable habitats. These

habitats are protected directly by law. This is a completely new instrument in the legislation. The new measures to conserve habitat types at the same time conserve the species typical to these habitat types such as the plant species typically occurring on serpentine rock. In addition the Act includes two new provisions for species conservation, the first (section 81) being the possibility of the nature conservation authority to give a temporary decision on the conservation of an occurrence of a species previously unknown to science and the second (section 76) being the duty of any authority to take into account any threatened species in permit consideration under the relevant act or in decision-making concerning land use planning in compliance with the separate provisions of other legislation concerning the safeguarding of nature values.

Furthermore, in line with the description of the measure, **the government shall submit the new Nature Conservation Act to Parliament by 31 January 2022. The new Act shall enter into force during 2022. [...]**

The Council Implementing Decision required that the government shall submit the new Nature Conservation Act to Parliament by 31 January 2022 and that the new Act shall enter into force during 2022. The government submitted the Act to the Parliament on 12 May 2022 and it entered into force on 1 June 2023. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, the new Nature Conservation Act had entered into force at the time of the assessment. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

[...] The implementation of the Act shall be carried out by the Centres for Economic Development, Transport and the Environment, Metsähallitus and the Ministry of the Environment.

According to section 9 of the Act, the implementation of the Act shall be carried out by the Centres for Economic Development, Transport and the Environment, Metsähallitus and the Ministry of the Environment.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 50 - Nutrient recycling and recovery projects are awarded

Related Measure: Gypsum treatment and nutrient recycling

Qualitative Indicator: Notification of award of all grants

Time: Q4 2023

1. Context:

The measure supports climate and environmental objectives in two distinct manners, namely (i) the treatment of arable land with gypsum that aims at reducing the phosphorus load from agriculture to the Baltic Sea, and (ii) R&D projects aimed at reducing the discharge of nutrients into water bodies by promoting nutrient recycling from nutrient rich waste streams from urban areas, which is expected to contribute to the prevention of eutrophication and degradation.

This milestone concerns the notification of award of all grants for the reduction of discharge of nutrients into water bodies in selected sites by promoting nutrient recycling from nutrient rich waste streams from urban areas.

It will be followed by target 51 that will assess the achievement of the objective in at least seven sites.

The investment has a final expected date for implementation of 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone was satisfactorily fulfilled.
2	Copy of the Government Decree of 10 September 2020 on nutrient recycling and wastewater treatment energy efficiency projects in 2020-2026 (657/2020) v1.pdf https://www.finlex.fi/fi/laki/alkup/2020/20200657	The Decree lays down basic rules for nutrient recycling projects promoting water protection and for projects promoting the energy efficiency of wastewater treatment and energy recovery. The Decree is issued under the Law on discretionary government grants (688/2001), which also applies to the grants.
3	Copy of the call for applications by the Ministry of Environment organised on 1 January – 28 February 2022	The application instructions for the call for applications organised on 1 January – 28 February 2022 (application instruction dated 15 December 2021) include basic information on the call for applications and the related conditions, including the assessment and evaluation/eligibility criteria for the projects.

4	Copy of the call for applications by the Ministry of Environment organised on 1 January – 31 March 2023	The application instructions for the call for applications organised on 1 January-31 March 2023 (application instruction dated 28 December 2022) include basic information on the call for applications and the related conditions, including the assessment and evaluation/eligibility criteria for the projects.
5	Summary of the assessment of the financed projects	The evidence summarises the evaluation process of the two rounds of calls for applications in which the responsible authority evaluates the financed projects with regard to its evaluation criteria. The evidence also includes a list of all selected projects under all the nutrient recycling calls launched under this measure and the successful applicants.
6	Assessment of the implementation of the specific RRF criteria of the projects by the implementing body.	The evidence includes assessment of the financed projects against the requirements of each nutrient recycling call launched.
7	Copies of the grant award decisions	The evidence includes the copies of the grant award decisions evidencing the successful applicants, date and the reference of the document.
8	Confirmation of DNSH criteria through an exclusion list	The evidence supplements assessment of the financed projects (item 6 of the evidence list) relating to the assessment of the DNSH criteria through an exclusion list. The document has been signed electronically in connection with the payment request by the Deputy Director General of the Department for the Natural Environment, responsible for the implementation of this measure.
9-15	Copies of proof of the notification of the award of all grants	The evidence includes copies of the notification of the award of grant sent to each grant recipient

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

Notification of the award of all grants under the open calls for application for nutrient recycling and recovery [...]

Item 7 in the evidence list provides copies of the award decisions of the grants under the open calls for application for nutrient recycling and recovery. These follow the publication of two calls for applications by the Ministry of Environment, that were open 1 January – 28 February 2022 (application instruction dated 15 December 2021) and 1 January – 31 March 2023 (application instruction dated 28 December 2022), as indicated by items 3 and 4 of the evidence list. Each award decision refers clearly either to the first or second call for applications. In each of the award decision it is stated clearly that decision is addressed to the applicant.

Items 9 to 15 in the evidence list provides proof of the notification of the award of all the grants. Grants are processed through the government document handling process system VAHVA.

Applications are received and processed in VAHVA. Handler receives a notification that the project has been signed, and then notification to the recipients are sent through VAHVA (send button). VAHVA registers in the system the date the notification of the award has been sent to the beneficiary. Sending happens manually (SEND-button) through the system. This functionality is demonstrated in screenshots under item 9 to 15. The Commission services conducted an on-the-spot check on 12 September 2025 to verify the effective notification of the award of all grants to the grant beneficiaries. All checks were carried out successfully confirming that all the notification were effectively notified, as set out in the Council Implementing Decision.

[...] in compliance with the 'Do no significant harm' Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation

The call documentation of the two calls for applications (item 3 and 4 in the evidence list) contains the Do no significant harm requirement as well as the requirement of compliance with the relevant EU and national environmental legislation. In addition, item 8 in the evidence list provides a project-specific assessment of DNSH requirement. ***The Council Implementing Decision required the DNSH exclusion list in the call for applications as well as the requirement of compliance with the relevant EU and national environmental legislation.*** However, the exclusion list is lacking from both calls for applications and the references to the compliance with the relevant EU and national environmental legislation from the first call for applications. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, Finland has not selected projects with activities in the exclusion list, namely those related to fossil fuel-based power generation and distribution, activities covered by the EU Emission Trading System with projected CO₂ equivalent emissions that are not substantially lower than the relevant benchmarks established for free allocation, actions related to waste treatment, or actions for which the long-term disposal of waste may cause significant and long-term environmental harm. Item 8 in the evidence list provides adequate evidence on this through the ex-post evaluation of the selected projects in the administrative certificate of the Ministry of Environment. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Furthermore, in line with the description of the measure, **the support for the R&D projects on nutrient recycling shall be granted under Government Decree on nutrient recycling and wastewater treatment energy efficiency projects in 2020-2026 (657/2020).**

Item 2 in the evidence list is a copy of the Government Decree on nutrient recycling and wastewater treatment energy efficiency projects in 2020-2026 (657/2020) that lays down basic rules (types of projects that can benefit from state aid, factors considered in the decision-making, potential beneficiaries, maximum amount of aid, acceptable costs) for nutrient recycling projects promoting water protection and for projects promoting the energy efficiency of wastewater treatment and energy recovery.

Application instructions - item 3 and 4 in the evidence list - explicitly refer to the Government Decree (657/2020) as legal basis for the calls for application.

Furthermore, in line with the description of the measure, **open calls shall be launched under the responsibility of the Ministry of the Environment**

Items 3 and 4 in the evidence list provides copies of the two calls for applications by the Ministry of Environment, that were open 1 January – 28 February 2022 (application instruction dated 15 December 2021) and 1 January – 31 March 2023 (application instruction dated 28 December 2022). It is evidenced in page 3 in both calls that the calls were launched by the Ministry of Environment.

Furthermore, in line with the description of the measure, **the projects shall support the introduction of new techniques and methods for nutrient recycling, the production of competitive end-products with a high degree of processing, investment in R&D and the competitiveness of the industry.**

Items 3 and 4 in the evidence list provides copies of the two calls for applications by the Ministry of Environment that were open 1 January – 28 February 2022 (application instruction dated 15 December 2021) and 1 January – 31 March 2023 (application instruction dated 28 December 2022). The conditions and criteria for the projects to be supported were presented in these calls for applications. The themes and types of the projects were given in chapter 3 in the respective calls, according to which the subsidies were allocated to the following themes:

- Recovery and utilization of nutrients or nutrients and organic matter contained in municipal wastewater and sludge
- Cooperation on nutrient recycling, where the parties form a valuchain or network of actors for nutrient recycling utilizing nutrient-rich waste and side streams and/or water biomass from communities

Chapter 3 in both calls for applications list as possible project types also research, development and innovation projects (RDI) as well as piloting, demonstration or implementation of new technologies and methods, and the initiation of related investments. The goals of the projects could include, inter alia, the production of competitive end products with a high degree of processing, the safe utilization of end products, and the development of control measures to promote nutrient recycling.

Chapter 2 of item 3 indicates that nutrient recycling is included in the nutrient recycling action programme and in Finland's Sustainable Growth Programme and is expected to positively impact competitiveness.

Furthermore, in line with the description of the measure, **in the selection process, particular attention, shall be paid to the impacts on climate change, eutrophication and biodiversity. Selection criteria shall ensure that all projects contribute to the climate change objectives are linked to the intervention field 045bis that has 100% climate coefficient in accordance with Annex VI to Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility. [To this end..] Selected projects for nutrient recycling shall ensure that at least 50% of the recoverable nutrients or biomass in wastewater shall be converted into secondary raw materials**

Items 3 and 4 in the evidence provides copies of the two calls for applications by the Ministry of Environment, that were open 1 January – 28 February 2022 (application instruction dated 15 December 2021) and 1 January – 31 March 2023 (application instruction dated 28 December 2022). The Council Implementing Decision required that selected projects for nutrient recycling ensure that at least 50% of the recoverable nutrients or biomass in wastewater shall be converted into secondary raw materials This requirement is missing from the second call for applications. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, Finland has selected only projects meeting this criterion. In item 6 in the evidence list Section 2 - Criteria for projects, letter a) explicitly mentions the said requirement. Moreover,

adequate evidence is provided in Section 3 through a project-specific assessment where the requirement is part of the selection criteria of the implementing body. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled. The impacts on climate change, eutrophication and biodiversity were assessed as part of the DNSH-assessment as evidenced in item 8 in the evidence list.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 53 - Award of all grants for the precision forestry projects selected for funding

Related Measure: Climate-sustainable measures in the land use sector

Qualitative Indicator: Notification of the award of all grants

Time: Q4 2023

1. Context:

The objective of this investment is the development of climate-sustainable land use methods. Finland finances initiatives that enable the forestry sector to use better targeted and more diverse logging and farming methods, in which soil, natural values and water protection are considered more strongly than at present ("precision forestry").

This milestone concerns the award of all grants for the precision forestry treatment projects selected for funding.

Milestone 53 is the second step of the implementation of the investment. It follows milestone 52 relating to the publication of the first call for proposals for precision forestry projects and it will be followed by target 54 related to number of precision forestry projects completed.

The investment has a final expected date for implementation by 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Copy of the terms of reference for the first call for applications	The call for application by the Ministry of Agriculture, open from 9 November to 15 December 2021.
3	Copy of the terms of reference for the second call for applications	The call for application by the Ministry of Agriculture, open from 8 September to 11 October 2022.
4-7	A copy of the project-specific checklists.	The project-specific checklists of the projects chosen under the second call for applications by the Ministry of Agriculture to check the projects' eligibility for funding as a part of the project assessment.
8-11	Projects' statements regarding DNSH and ditching	Declarations by the project beneficiaries chosen under the second call for applications that no new or remedial ditching is funded under this measure. These documents are either copies of email responses or separate reports, as delivered by each project.
12	List of selected projects and recipient entities	A list of all projects that were funded under this measure as well as each of the 28 recipient entities by name.
13-45	Copies of grant award decisions	Copies of grant award decisions of each of the 28

	of each recipient for each financed project	recipient entities of the nine funded projects, including later corrections or modifications.
46	Publication of funding call results from the Ministry's website	Copy of the announcement of project call results open from 9 November to 15 December 2021 from the website of the Ministry of Agriculture. They are also available on: https://mmm.fi/-/kestavan-kasvun-ohjelmasta-yhteensa-3-8-miljoonan-euron-rahoitus-viidelle-metsataloushankkeelle (20.5.2022)
47	Publication of funding call results from the Ministry's website	Copy of the announcement of project call results open from 8 September to 11 October 2022 from the website of the Ministry of Agriculture. https://mmm.fi/-/kestavan-kasvun-ohjelmasta-4-4-miljoonan-euron-rahoitus-neljalle-metsataloushankkeelle-1 (15.2.2023)
48	Summary by the Ministry of Agriculture regarding its assessment of the financed projects against the requirements of all calls launched under this measure	A summary by the Ministry of Agriculture regarding the assessment process and assessment criteria under this measure.
48-89	Copies of the grant award notification	Proof of notification of the grant award decision

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

Notification of the award of all grants for precision forestry projects selected under the respective calls for proposals.

Items 48 to 89 in the evidence list show the grant award notification to grant recipients. Grants are processed through the government document handling process system VAHVA. Applications are received in VAHVA. The VAHVA system registers also the date the notification of the award has been sent to the beneficiary. Sending happens manually (SEND-button) through the system.

The Commission services conducted an on-the-spot check on 12 September 2025 to verify the effective notification of the award of all grants to the grant beneficiaries. All checks were carried out successfully confirming that all the notification were effectively notified, as set out in the Council Implementing Decision.

All calls shall be based on the eligibility/selection criteria reflected in milestone 52.

Item 3 in the evidence list shows that the second call for applications that was open from 8 September to 11 October 2022 is compliant with the eligibility/selection criteria reflected in milestone 52, in particular that:

- The terms of reference include eligibility criteria that ensure that the selected projects comply with the 'Do no significant harm' Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation.

- The measure shall include additional methods, technologies and generation of information to promote the sustainability of forests, including by favouring mixed forests and strengthening forest biodiversity, inter alia through increasing the amount of dead wood in the site.
- The eligibility/selection criteria ensures that all projects contribute to the climate change objectives linked to the intervention field 050 that has a 40% climate coefficient in accordance with Annex VI to Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility.

The Council Implementing Decision for M52 required that the terms of reference states that **In the forests where continuous forest management methods are applied, which implies that there are no clear cuts, there shall be no new or remedial ditching.** This is missing from the terms of reference. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, items 4-7 in the evidence list show that the ban was also a part of the assessment criteria through the checklist that takes into account all the requirements of the Council Implementing Decision. Furthermore, the funding authority required each of the nine awarded projects to reaffirm the fulfilment of this condition by a separate questionnaire. The four projects confirmed in their replies that the projects do not include ditching, evidenced by items 8-11. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

All funding award decisions have been awarded to the project beneficiaries/applicants selected under the competitive calls for proposals, enabling the start of the implementation of the selected projects. In line with the description of the measure, at least seven projects shall be funded.

Item 12 in the evidence list describes the nine projects that were funded. All the projects are carried out by consortiums and thus the number of individual award decisions is 28. Item 13-45 in the evidence list contains those 28 individual funding decisions that were awarded to the successful applicants. Each individual funding decision contains also a reference to the project it is part of. The award decisions contain clear links to the first and second competitive calls for proposals by the Ministry of Agriculture, that were respectively open from 9 November to 15 December 2021 and from 8 September to 11 October 2022.

Furthermore, in line with the measure description, the measure is targeted at actors in the forest sector (forest owners, planning, technology, contracting and other companies and communities active in the field).

Item 2 and 3 in the evidence list indicate that the calls are targeted at actors in the forest sector, in particular Section 1 – general search and Section 2 - purpose of the search.

Furthermore, in line with the measure description, **the support for the development of new land use measures shall be granted on the basis of Government Decree 5/2021 on grants for climate measures in the land use sector in 2020-2025.**

Item 13-45 in the evidence list provides copies of the award decisions. It is stated in the decisions that they are based on the Government Decree 5/2021 on grants for climate measures in the land use sector in 2020-2025.

Furthermore, in line with the measure description, **the Ministry of Agriculture and Forestry shall publish a call for applications for development and training projects.**

Items 2 and 3 in the evidence list provides copies of the two calls for applications for development and training projects by the Ministry of Agriculture, that were respectively open from 9 November to 15 December 2021 and from 8 September to 11 October 2022.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 68 - Adoption of legislation on extending the coverage of the residential and commercial property information system

Related Measure: P2C2.R1 Development of the residential and commercial property information system

Qualitative Indicator: Parliament adopts the amendments to the Act on the Residential and Commercial Property Information System and the Limited Liability Housing Companies Act

Time: Q2 2023

1. Context:

The objective of the measure is to improve consumer protection in the housing market as well as competition in the housing sector and support the development of a residential and commercial property information system with information on the financial and technical condition and repair needs for residential and commercial property, including the transmission of data from housing company loans to a positive credit data register. The development of such a residential and commercial property information system, which enables fairer treatment of consumers in credit granting situations, is a key condition for the creation of a positive credit registry.

Milestone 68 concerns amendments to the Act on the Residential and Commercial Property Information System and the Limited Liability Housing Companies Act, adopted by Parliament, to extend the coverage of the housing information system to information on housing companies by introducing the obligation of housing companies to make available basic data in structured machine-readable format, and the right to access the data made available in structured machine-readable format.

Milestone 68 is the first step of the implementation of the reform. It will be followed by milestone 69 and milestone 70, related, respectively, to the entry into force of the legislative amendments and to the technical implementation of the residential and commercial property information system. The reform has a final expected date for implementation by 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled
2	Residential and Commercial Property Information System Act (RCPIS Act)	Copy of the Act on the Residential and Commercial Property Information (1328/2018) including all amendments before the amendment 151/2023, published on 15 January 2021 and adopted on 1 February 2021, including all the amendments
3	Act 151/2023 amending the RCPIS Act	Copy of and link to the publication of the Act 151/2023 amending the RCPIS Act in the Statute Book of Finland, published on 3 February 2023 and adopted on 1 June 2023, https://www.finlex.fi/fi/laki/alkup/2023/20230151
4	Limited Liability Housing Companies Act (LLHC Act)	Copy of the Limited Liability Housing Companies Act (1599/2009) including all amendments before the amendment 152/2023, published on 8 July 2022 and adopted on 11 July 2022.
5	Act 152/2023 amending the LLHC Act	Copy of and link to the publication of Act 152/2023 amending the LLHC Act in the Statute Book of Finland, published on 3 February

6	Decision of the Parliament EV 167/2022 vp – HE 168/2022 vp	2023 and adopted on 1 June 2023, https://www.finlex.fi/fi/laki/alkup/2023/20230152 Copy of and link to the decision of the parliament to adopt the amendments in the RCPIS Act and LLHC Act, https://www.eduskunta.fi/FI/vaski/EduskunnanVastaus/ Documents/EV_167+2022.pdf
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3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the milestone.

To extend the coverage of the housing information system to information on housing companies, the Act on the Residential and Commercial Property Information System and the Limited Liability Housing Companies Act shall be amended.

The Residential and Commercial Property Information System Act (RCPIS Act), 1328/2018 (item 2 of the evidence list), was amended by Act 151/2023, item 3 of the evidence list, which was published on 3 February 2023 and adopted on 1 June 2023.

The Limited Liability Housing Companies Act (LLHC Act), 1599/2009 (item 4 of the evidence list), was amended by Act 152/2023, item 5 of the evidence list, which was published on 3 February 2023 and adopted on 1 June 2023.

A parliamentary decision adopting both acts on 23 November 2022 was also provided, EV 167/2022 vp – HE 168/2022 vp, item 6 of the evidence list.

The amendments' extension of coverage of the housing information system to information on housing companies is detailed below.

In particular, amendments shall cover;

- obligation of housing companies to make available basic data in structured machine-readable format;

Section 17a of the RCPIS Act, created by the amendment Act 151/2023, item 3 of the evidence list, requires housing companies to disclose information in a machine-readable format via a user or a technical interface. The reporting obligation is annual for all housing companies. However, for housing companies that either have five holdings or fewer, or whose holdings are not in the ordinary course of trade, or that do not have a loan for which the liability is divided between shareholders, the reporting obligation is not annual but only upon request by a third party. The information required is defined in sections 13 and 13a, respectively amended and created by Act 151/2023, including financial data, property information, repairs and alterations performed and required, as defined in section 3 of chapter 6 of the LLHC Act. This section 3 of chapter 6 was amended by Act 152/2023, item 5 of the evidence list, including the addition of the requirement to report information of repairs and alterations.

- right to access the data made available in structured machine-readable format.

Section 19 of the RCPIS Act, item 2 of the evidence list, determines the disclosure of information for the needs outlined in section 2, including for the exchange of shares of houses, collateral management, information needs of the administration of the housing companies and their shareholders, research, and statistics. A new paragraph was added in section 19 in the RCPIS Act with Act 151/2023, item 3 of the evidence list, defining the right for the positive credit data register to access information from the RCPIS without a license, including on liabilities. Section 20 determines that the normal use of information via technical interface requires a licence that can be

granted upon application, and grants housing companies and shareholders the right to obtain information required for the company's normal administration without a license.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 79 - All five digital functionalities required by the Nordic employment service model are integrated into the public employment services' (TE-PES) information system and are operational

Related Measure: P3C1R1 - Nordic Model of Employment Services

Qualitative Indicator: Digital functionalities integrated into the public employment services' (TE-PES) information system and operational

Time: Q4 2023

1. Context:

The objective of this measure is to reform the public employment services processes. The reform consists of transitioning towards a new model of employment services, complemented by a digital information system for public employment services.

The milestone relates to the development and integration of five functionalities of the digital infrastructure into the public employment services' (TE-PES) information system, to be fully operational in order to enable the implementation of the Nordic employment service model.

Milestone 79 is the second milestone of the reform, preceded by milestone 77 on entry into force of the Law on Public Employment and Business Services. It will be followed by target 78, related to operationalisation of the Nordic model of employment services. The reform has a final expected date for implementation of June 2024.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements as listed in the description of the milestone and of the corresponding measure in the CID annex) was satisfactorily fulfilled
2	Report - KEHA-Centre	A report by KEHA-Centre.
3	Expanding the assessment tools of customer needs - screenshots	Screenshots and flowcharts for the functionality of "Expanding the assessment tools of customer needs".
4	Complementing the automatic job search profile - screenshots	Screenshots for the functionality of "Complementing the automatic job search profile".
5	Job search self-reporting system for jobseekers - screenshots	Screenshots for the functionality of "Job search self-reporting system for jobseekers".
6	Electronic appointment system for job search interviews - screenshots	Screenshots for the functionality of "Electronic appointment system for job search interviews".
7	Customer online guidance - screenshots	Screenshots for the functionality of "Customer online guidance"
8	Memorandum of steering group	Memorandum by the Ministry of Economic Affairs and Employment endorsing the report by KEHA I.

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the milestone.

All five functionalities of the digital infrastructure shall be developed and integrated into the public employment services' (TE-PES) information system and shall be fully operational to enable the implementation of the Nordic employment service model.

The first chapter of item 2 on the evidence list (Report – KEHA Centre) explains that the development of functionality was started under the old TE-PES/URAVAPA system, gradually phased out and replaced by the TE-PES/Job Market Finland system. Point 5 of the item 8 of the evidence list – Memorandum by the Ministry of Economic Affairs and Employment endorsing the KEHA report confirms that all five functionalities of the digital infrastructure set out in the milestone have been developed and integrated into the public employment services' (TE-PES) information system and are fully operational. The Commission services conducted an on-the-spot check on 28 February 2025 and on 10 July 2025 to verify the functionalities of the TE-PES/Job Market Finland system and that they are fully operational. The authorities explained that the functionalities were developed in the development environment of the TE-PES system and then integrated into the production environment of the TE-PES system. These checks were completed successfully confirming that all five functionalities are integrated into the TE-PES system and are fully operational:

The five functionalities required by the Council Implementing Decision are:

- **expanding the assessment tools of customer service needs**

Expanding the assessment tool took place through two releases as per item 3 on the evidence list. The Commission services conducted an on-the-spot check on 28 February 2025 to verify the functionality of the assessment tools of customer service needs. This check was completed successfully, confirming that the customer service needs are assessed against information gathered during the different stages of the customer process starting from the filling in the profile information by the job seeker, during the interview and during monitoring of the compliance of job seeker's conduct with the rules of the employment authority. The information system provides up to date status of the customer in question and prompts action by the customer and by the officer, relevant to the status. The on-the-spot check confirmed that the specific requirement as set out in the Council Implementing Decision is satisfactorily fulfilled. Additionally, the functionality of this process is also described in screenshots under item 3 (Expanding the assessment tools of customer needs) of the evidence list.

- **complementing the automatic job search profile;**

The Commission services conducted an on-the-spot check on 28 February 2025 to verify the functionality of the automatic job search profile. This check was completed successfully, confirming that following the filling out of the personal, educational, occupational and other job search related data into TE-PES Job Market Finland system, the system creates an automatic job search profile, which the job seeker can choose to make visible to the employers. The on-the-spot check confirmed that the specific requirement as set out in the Council Implementing Decision is satisfactorily fulfilled. Additionally, the functionality of this process is demonstrated also in screenshots under item 4 (Complementing the automatic job search profile) of the evidence list.

Furthermore, the description of the measure, requires that **the digital information system for public employment services will comprise Customer relations management production system**. Customer relations management production system consists of the functionalities under the above two

bullets: i) expanding the assessment tools of customer service needs and ii) complementing the automatic job search profile.

- **job search self-reporting system for jobseekers;**

Furthermore, the description of the measure requires that **the digital information system for public employment services will comprise self-reporting tool (“Message Service”)**

The Commission services conducted an on-the-spot check on 28 February 2025 and 10 July 2025 to verify the functionality of the job search self-reporting system for job seekers. These checks were completed successfully, confirming the functionality of the self-reporting system against the employment plan, which is drawn for the job seeker during the initial interview. The reporting system monitors the fulfilment of the obligations required of the job seeker for finding employment. Furthermore, TE-PES system has a separate message/contact functionality, where the job seeker can leave a contact request to the labour authority. The on-the-spot checks confirmed that the specific requirements as set out in the Council Implementing Decision is satisfactorily fulfilled. Additionally, the functionality of this process is demonstrated also in screenshots under item 5 (Job search self-reporting system for jobseekers) of the evidence list.

- **electronic appointment system for job search interviews;**

Furthermore, the description of the measure requires that **the digital information system for public employment services will comprise appointment booking system**

The Commission services conducted an on-the-spot check on 28 February 2025 to verify the functionality of the electronic appointment system for job search interviews. This check was completed successfully, confirming the workflow which follows the filling out of the job search profile, leading to the electronic setting up of the interview, as well as the functionality available for the counsellor and the job seeker. The on-the-spot checks confirmed that the specific requirement as set out in the Council Implementing Decision is satisfactorily fulfilled. Additionally, the functionality of this process is also demonstrated in screenshots under item 6 (Electronic appointment system for job search interviews) of the evidence list.

- **customer online guidance.**

Furthermore, the description of the measure requires that **the digital information system for public employment services will comprise online guidance service**

The Commission services conducted an on-the-spot check on 28 February 2025 to verify the functionality of the customer online guidance. This check was completed successfully, confirming the functioning of the Tarmo chatbot (default chatbot for questions regarding employment) and Aino chatbot (for international recruitment questions) and the existence of the chat service with Job Market Finland service specialists. The on-the-spot checks confirmed that the specific requirement as set out in the Council Implementing Decision is satisfactorily fulfilled. Additionally, the functionality of this process is also demonstrated in screenshots under item 7 (Customer online guidance) of the evidence list.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 80 - Entry into force of legislative amendments to the Unemployment Security Act concerning the phasing out of additional days of unemployment security

Related Measure: P3C1.R2 Removal of additional days of unemployment allowance

Qualitative Indicator: Provisions in the amendments to the Unemployment Security Act, indicating their entry into force

Time: Q2 2023

1. Context:

The objective of the reform is to foster employment by removing disincentives to work for older people and reduce redundancies on older employees. The measure consists in amending the Unemployment Security Act in order to phase out the age limit for additional days of earnings-related unemployment benefits with the expected impact of about 7 900 workers staying in the labour market by the end of 2029.

Milestone 80 requires that the amendments to the Unemployment Security Act have entered into force. The legislative amendments shall include the gradual abolition of additional days of unemployment allowance so that the minimum age to be eligible for additional days of unemployment allowance shall rise by one year for those born in 1963 onwards. In addition, the possibility of additional days of unemployment allowance shall be abolished completely for those born in (or after) 1965.

Milestone 80 is the only milestone of this reform with a final expected date for implementation on 30 June 2023.

2. Evidence provided:

Name of the evidence	Short description
1 Summary document	A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2 Unemployment Security Act (1290/2002) – as entered into force on 1 January 2014	A copy the Unemployment Security Act 1290/2002 before the amendment (amendment 1049/2013 and link to where it is published in the Statute Book of Finland https://www.finlex.fi/fi/laki/alkup/2013/20131049)
3 A copy of the Act 669/2022 amending the Unemployment Security Act (1290/2002) - entered into force on 1 January 2023	Copy of the Act 669/2022 amending the Unemployment Security Act (1290/2002)

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the milestone.

Entry into force of amendments to the Unemployment Security Act.

Item 3 on the list of evidence is the amendment (669/2022) to the Unemployment Security Act (1290/2002) published in the statute book of Finland on 11 July 2022. It entered into force on 1 January 2023.

The legislative amendments shall include the gradual abolition of additional days of unemployment security so that the minimum age of additional days shall rise by one year/age group from the birth of 1963 onwards [...]

Furthermore, in line with the measure description “[...] **amending the Unemployment Security Act in order to phase out the age limit for additional days of earnings-related unemployment benefits**”.

Chapter 6, section 9 of item 2 on the evidence list - the Unemployment Security Act (1290/2002) in place prior to the amendment - provided that additional days of basic and earnings-related unemployment allowance were applied to persons who were born:

- ☐ In 1955 or 1956 and had reached the age of 60 before the end of the maximum period;
- ☐ Between 1957 and 1960 and had reached the age of 61 before the end of the maximum period;
- ☐ In or after 1961 and had reached the age of 62 before the maximum period.

Chapter 6, section 9 of the item 3 on the evidence list - amendment 669/2022 to the Unemployment Security Act - increased the minimum age of additional days from 62 to 63 years for those born in 1963 and to 64 years for those born in 1964.

The legislative amendments shall include [...] the possibility of an additional day shall be abolished completely for those born in 1965 and thereafter.

Chapter 6, section 9 of the item 3 on the evidence list - amendment 669/2022 to the Unemployment Security Act - abolished the possibility for additional days of unemployment security for those born in 1965 or thereafter by limiting the possibility for additional days of unemployment to those born before 1965.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 82 - Entry into force of legislative amendments to the Aliens Act (301/2004)

Related Measure: P3C1.R3 - Streamlining the work and education-based immigration process

Qualitative Indicator: Provisions in the amendments to the Aliens Act, indicating their entry into force

Time: Q2 2023

1. Context:

The objective of the reform is to streamline procedures for granting residence permits based on work and education, aiming to increase immigration of skilled workers and facilitate employment of international students to address labour shortages. The reform includes the entry into force of improvements on immigration legislation, including legislation concerning students, researchers, and trainees, the shortening of permit procedures for growth entrepreneurs, specialists and their family members. The legislative reform is supported by a digital infrastructure investment to support work- and education-based immigration systems, procedures, guidance and communication.

Milestone 82 concerns the entry into force of legislative amendments to the Aliens Act (301/2004) that aims to streamline the permit processes for work- and education-based immigration. The legislative amendments include (i) the refining of responsibilities of the employer and the applicant in the application process; (ii) differentiating the specialist's residence permit into its own category with revised conditions for granting the permit; (iii) changes to the regulations governing the activities of the Finnish diplomatic missions abroad; and (iv) revised conditions for issuing residence permits.

Milestone 82 is the third milestone of the reform, and it follows the completion of milestone 81 regarding the entry into force of a legislative amendment concerning students, research and trainees (719/2018) and milestone 83 regarding creation of a fast-track for processing residence permits for specialist, growth entrepreneurs and their accompanying family members. It will be followed by target 84, related to decrease in the average number of days for processing residence permit applications based on work and education. Target 84 also relates to the digital infrastructure supporting the needs of the work- and education-based immigration. The reform has a final expected date for implementation on 31 December 2024.

2. Evidence provided:

Name of the evidence	Short description
1 Summary document	A summary document duly justifying how the milestone was satisfactorily fulfilled.
2 Copy of the Amendment to the Aliens Act (216/2023)	Copy of the Act on amending the Aliens Act published on the 22nd of February 2023 in the Statute Book of Finland (https://www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2023/216)
3 Copy of the Aliens Act (301/2004) in force 15.2.2023	Copy of the Aliens Act in force on 15 February 2023, prior to the amendments
4 Copy of the Government proposal HE 114/2022 vp	Government proposal on the amendments to the Finnish Aliens Act (HE 114/2022 vp).

5	Copy of the Government Decree on conditions for granting employer certification referred to in the Aliens Act (250/2023)	Copy of the Government Decree on conditions for granting employer certification referred to in the Aliens Act (250/2023). The Government Decree lays down the specific conditions for granting employer certification. The Decree can also be found in the digital service Finlex https://www.finlex.fi/fi/laki/alkup/2023/20230250
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3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

The Aliens Act (301/2004) shall be amended with the objective of streamlining the permit processes for work- and education-based immigration.

Furthermore, in line with the description of the measure, **the measure consists in an extensive cross-administrative project on improving immigration legislation (namely, amendments to Chapter 5 of the Aliens Act (301/2004) [...]) and shortening the work and education-based residence permit processes.**

Item (2) on evidence list, the Act amending the Aliens Act (216/2023), published in the Statue Book of Finland <https://www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2023/216> on 22 February 2023, stipulates in the enacting clause in the final provisions of the act its entry into force on 23 February 2023. The amendment (216/2023) is based on the Government Proposal HE 114/2022 (item 4 on the evidence list).

Chapter 5 of the Act amending Aliens Act (216/2023), (item 2 on the evidence list), streamlined the permit processes for **work-based immigration** in the following sections, allowing for shorter processes:

- Sections 71a and 71b define **information the employees and employers must include in all work-based residence permit applications**. This makes the process more transparent compared to the previous law, which was less explicit in its requirements. Also, according to the first paragraph of chapter 4.2.5.1 in the Government Proposal HE 114/2022 (item 4 on the evidence list) the clear requirements allow better use of automation in the process.
- Sections 76-78 introduce legislation on the **employer certification**. If the criteria in section 1 of the Decree on conditions for granting employer certification referred to in the Aliens Act (250/2023) (item 5 on the evidence list), are met, certification can be granted to an employer. Certified employers need to provide less information in the application stage, which speeds up the processing of an application.
- Sections 79 and 79a specify the **requirements for a residence permit for an entrepreneur**. The requirements are more detailed than the broadly described requirements under section 76 of the previous Aliens Act 301/2004, (item 3 on the evidence list). The assessment carried out by The Centres for Economic Development, Transport and the Environment (ELY Centres) must verify that the applicant for the residence permit has adequate means to support themselves through the incomes of the business, employment income or other sources. More detailed requirements allow for better transparency to the process and reducing the need for additional questions.
- Section 80 introduces **changes to the process for the residence permit for a startup entrepreneur**, compared to section 47h in the previous Aliens Act 301/2004 (item 3 on the evidence list). The validity of the statement by Business Finland, which is required for the

application, was increased from 2 to 4 months to decrease re-applications to Business Finland.

- Section 64, sub-section 2 introduces **remote hearings in the residence permit process**.

In addition to improvements made to **education-based immigration** as assessed under Milestone 81 of this measure, section 75 of the Act amending Aliens Act 216/2023 (item 2 on the evidence list) introduces a separate residence permit for a person who has completed a degree or completed research in Finland and whose primary reason for continued residence is to work or start a business in Finland. The Aliens Act 301/2004 prior to the amendments (item 3 on the evidence list) lays out provisions under section 77, paragraph 1, item 8 for the residence permit for person who has completed a degree or completed their research in Finland. That permit could only be granted for the purpose of work, while business activities were not mentioned. Section 81a, item 5 of the Act amending Aliens Act (216/2023) provides for an unlimited right to work for migrants holding the residence permit under this category. This is a more permissive residence permit than the situation prior to the amendment. Section 78, paragraph 2 of the Aliens Act 301/2004 prior to the amendment (item 3) was more restrictive, limiting the right to work to the specific field for which the work-based residence permit was granted.

The legislative amendments shall include refining the responsibilities of the employer and the applicant in the application process.

The Act amending Aliens Act (216/2023) (item 2 on the evidence list) clarifies the responsibilities of the employer and the applicant. Section 72 of the Aliens Act 301/2004 prior to amendment (item 3 on the evidence list) laid down some provisions on **employers' obligations concerning information for residence permits for employed persons**. Employee's obligations were not specified. The Act amending Aliens Act (216/2023) (item 2 on the evidence list) introduces new sections, namely:

- 71a concerning information **employees** must provide for all work-based residence permit applications
- 72b concerning information **employers** must provide for all work-based residence permit applications.

The legislative amendments shall include [...] differentiating the specialist's residence permit into its own category with revised conditions for granting the permit.

Section 73 in the Act amending Aliens Act (216/2023) (item 2 on the evidence list), introduces specific residence permit category for a person employed as a specialist. Under the Aliens Act 301/2004 prior to amendment (item 3 on the evidence list) persons employed as specialists were covered under section 77(1). However, no specific criteria were provided to assess the specialist status. The amended Act (item 2 on the evidence list) defines that a person employed as a specialist should be employed in expert duties that require special expertise, for which the remuneration must be at least equal to the annual average earner's gross salary. The salary threshold would be determined annually.

The legislative amendments shall include [...] changes to the regulations governing the activities of the Finnish diplomatic missions abroad.

Section 64, paragraph 2, of the Act amending Aliens Act (216/2023) (item 2 on the evidence list) introduces **remote oral hearings in the residence permit process**. The amendment also extends the possibility for oral hearings from permits based on family ties to other residence permits. In addition to officials of the immigration service and officials of the Finnish representation abroad, the section 64 and section 66 paragraph 3 of the amendment (item 2 on the evidence list) specify that an official of the foreign service or employee of the representation appointed by the Head of the Mission may conduct an oral hearing and supervise the taking of DNA samples.

The legislative amendments shall include [...] revised conditions for issuing residence permits.

The Act amending Aliens Act (216/2023) (item 2 of the evidence list) includes the following revised conditions for residence permits:

- Article 71 lays out the general conditions, which are identical for all work-based residence permits. The earlier Aliens Act 301/2004 (item 3 on the evidence list) had different conditions depending on the type of the work-based residence permit, as specified by articles 72 and 77.
- Sections 71a and 71b lay out **the information required from employees and employers for all work-based residence permit applications**. The previous version of the Aliens Act 301/2004 (item 3 on the evidence list) only specified the information required from the employer in section 72. According to the first paragraph of the chapter 4.2.5.1 in the Government Proposal HE 114/2022 (item 4 on the evidence list) the clear requirements for the applicant allow better use of automation in the process.
- Section 73 introduces a salary threshold for the conditions for the residence permit for a person employed as a specialist.
- Sections 79 and 79a specify the conditions which Centres for Economic Development, Transport and the Environment (ELY Centres) must verify in its supporting assessment for granting a residence permit to an entrepreneur. In the earlier Aliens Act 301/2004, (item 3 on the evidence list) section 76 defined the eligibility conditions more broadly. According to the fourth paragraph of the chapter 4.1.3 of the Government Proposal HE 114/2022 (item 4 of the evidence list), the aim is to reduce the need for interpretation and to clarify the process.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 92 - Completion of a medium-term foresight model for labour and competence needs

Related Measure: P3C2R1 - Reform of continuous learning

Qualitative Indicator: Medium-term foresight model is operational

Time: Q4 2023

1. Context:

The objective of this reform is to improve employment opportunities of working-age people by developing their skills and competences. The reform aims at increasing the matching between the provision of educational courses and the labour market's needs.

Milestone 92 concerns the completion and setting in operation of a forecasting system for labour market competence needs, that will strengthen the capacity to anticipate the skills needed by the working age population.

Milestone 92 is the third milestone of the reform, and it follows the completion of milestone 93, related to the launching of calls to provide trainings to respond to changes in working life, including digitalisation and the green transition and milestone 91, related to the entry into force of the Act on the Service Centre for Continuous Learning. It will be followed by milestone 95 that requires the provision of trainings to career guidance professionals to increase their level of expertise and, finally, target 94, related to completed trainings to respond to changes in working life, including green and digital skills. The reform has a final expected date for implementation by 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Signed statement by the steering group of the project	Copy of a statement by the Steering Group of the Finnish Skills anticipation Forum that the model is completed and operational.
3	Signed report by the Finnish National Agency for Education	Report by the Finnish National Agency for Education, explaining the implementations and functionalities of the forecasting system.
4	Link to the website of the Vipusen Ennakointi (Vipunen Foresight) service	Medium-term foresight model for labour and competence needs: https://vipunen.fi/en-gb/foresight/Pages/default.aspx The website includes the following online services, publicly available: - The "Competence needs" service - The "Education and training needs of the workforce" service - The "Match between demand and supply of labour" service - "Qualification forecast" service

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

A forecasting system for labour and competence needs shall be completed and operational.

The measure has been implemented and completed and became operational after the Vipunen Foresight service opened on 3 June 2024, as reflected in the signed report by the Finnish National Agency for Education (evidence 3) and statement signed by the Steering Group (evidence 2). The service is available online (evidence 4) and open to the public, offering among its functionalities a forecast of labour and competences needs in Finland. forecast of labour and competences needs in Finland.

The model shall strengthen the capacity to anticipate the skills needed by the working age population

Furthermore, in line with the measure description, **the measure consists of the following interventions: [...] (ii) creating a system for anticipating labour and competence needs; [...]**

The Vipunen Foresight model (evidence 4) includes several openly available services which offer users forecasts of skills demanded in the labour market, as well as a forecast of the skills and qualifications obtained. This allows the model to provide a forecast on each of these dimensions, as well as matching demand and supply in different specialisations to provide a forecast on skills that will be oversupplied, skills that will meet demand in a balanced way, and skills that will be undersupplied.

The model shall include the forecasting of medium-term demand for labour, education and skills needs

The Vipunen Foresight model (evidence 4), includes several openly available online services, two of which directly address this requirement:

The “Competence needs” service offers users a forecast of changes in the need for vocational field-specific skills until 2030, according to different professional profiles. The change in the need for a particular skill is assessed on a scale of 1 to 5, where 1 = significantly decreases, 5 = significantly increases, and is available for a selection of 67 vocational fields. Each vocational field has related competences that are ranked based on the aforementioned scale. The assessments are based on the competence needs survey of the National Forum for Skills Anticipation (OEF).

In addition, the “Education and training needs of the workforce” service provides a forecast of how many new qualifications are needed in different sectors and fields of education to meet vocational fields’ labour needs in the period 2019–2040. The examination is based on two different economic scenarios, one more conservative and the other more optimistic.

The forecast of education needs is based on the anticipated demand for labour in vocational fields. Education needs are presented by education sector and field on average per year according to the two scenarios. The degrees included in the forecast are vocational upper secondary qualifications, bachelor’s degrees (polytechnic) and master’s degrees (university).

as well as an assessment of the development of various labour supply flows (predicting the number of qualifications completed at different levels of education, [...])

As part of the Vipunen Foresight model (evidence 4), the “Match between demand and supply of labour” service contains a state of play and a forecast the relationship between the supply of labour and job openings, covering the years 2022 to 2031. The report combines a forecast of new job opening with a forecast of labour supply in 75 vocational fields, determining for each if there exists an oversupply, undersupply or balanced situation in the medium term.

Labour supply is also captured by the “Qualification forecast”, a service available on the Vipunen Foresight model (evidence 4) that anticipates the number of new qualifications from vocational education and training, universities of applied sciences, and university education until 2031. The anticipated qualifications are vocational upper secondary qualifications, bachelor’s degrees (polytechnic), and master’s degrees (university) in the age group 15–64. In addition, the report anticipates the number of graduates entering the workforce directly after graduation.

[...] assessing the development of vocational transitions, [...])

The “Match between demand and supply of labour” service contains a state of play and a forecast the relationship between the supply of labour and job openings, covering the years 2022 to 2031. Vocational transitions are taken into account among other factors, to determine new job openings. The service offers a view of these factors in a disaggregated way, in which an assessment of the development of vocational transitions, that is, its yearly change between 2022 and 2031 can be consulted for 75 vocational fields.

[...] and assessing the labour potential of the unemployed and those outside the labour force).

The “Match between demand and supply of labour” service contains a state of play and a forecast the relationship between the supply of labour and job openings, covering the years 2022 to 2031. To calculate factors affecting labour supply between 2022 and 2031, unemployed persons and persons outside the labour force are taken into account. The service offers a view of these factors in a disaggregated way, in which the average change per year between 2022 and 2031 of labour provided by people outside the labour force and unemployed persons can be consulted for 75 vocational fields.

Commission Preliminary Assessment: satisfactory fulfilled

Number and name of the Target: 101 - Award of grants for leading companies' projects

Related Measure: P3C3I1 - RDI funding package promoting the green transition – Leading companies

Quantitative Indicator: Number

Baseline: -

Target: 5

Time: Q4 2023

1. Context:

The objective of the investment is to support partnerships and ecosystems between companies and other research organisations that strengthen the competitiveness of business and enhance the effectiveness of Research & Development activities, with a focus on areas of activity that support the green transition.

Target 101 refers to the notification of the award of at least 5 grants for leading companies' projects.

Target 101 is the first target of the investment, and it follows the completion of milestone 100 which included the publication of the call. It will be followed by target 102, related to the completion of the projects for which grants were awarded. The investment has a final expected date for implementation by 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target was satisfactorily fulfilled.
2	Summary of the assessment of the financed projects	The evidence provided is a summary by the responsible authority, Business Finland, showing that the assessment of the financed projects has been made against the requirements of each call launched under this measure as assessed in M100.
3-7	Copies of the grant award notifications	The evidence provided is a copy of the grant award notification evidencing the successful applicant, date and the reference of the document.
8	List of selected projects	The evidence provided is a list of projects selected under the call launched for this measure and the respective successful applicants, extracted from the BF database.
9-13	Copies of the funding memos	The evidence provided is a copy of the funding memo, produced by the Business Finland evaluation panel, showing that the assessment undertaken in the selection of projects complies with the milestone requirements.
14	Mandatory instructions for assessment	Business Finland's mandatory instructions for assessment of companies' RDI grant applications
15	Call instructions	Call instructions published together with the call

for projects

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the target.

Notification by Business Finland of the award of at least 5 grants for leading companies' projects [...]

Copies of grant award notifications (items 3-7), corroborating the list of 5 projects selected, indicate that the selected applicants have been notified of the awarded grant as well as providing information of the date and the reference number of the document.

The list of selected projects (item 8 of the evidence list), including the reference numbers, organisation names, amounts of awarded funding, date of funding and the application period, lists the 5 projects that were awarded grants in the call for leading companies' projects in RDI promoting the green transition, thus meeting exactly the target of 5 projects.

[...] selected in accordance with the eligibility/selection criteria specified in milestone 100.

Item 2 (summary document by Business Finland) explains how the assessment of the financed projects has been carried out against the requirements of each call, including the eligibility/selection criteria specified in milestone 100, and that the assessment and selection of projects complies with the milestone requirements by describing the approach to the assessment process. The evaluation and selection of projects has been done by Business Finland's experts who used an internal manual for the evaluation (item 14). The manual contains all the required eligibility criteria, and its compliance is mandatory in funding decisions. The evaluation panel has prepared a funding memo (items 9-13) for each project to describe the fulfilment of the eligibility criteria.

In addition, as the calls (related to milestone 100) were assessed in line with instructions set out by Business Finland (item 15) instructing applicants to refer to the call reference number 1/35/2021 in their application. Under the section Other (*Muuta*) of the funding memos (items 9-13), reference is made to the same reference number 1/35/2021 (as per item 15). This demonstrates that the grants were awarded with reference to the call assessed in milestone 100 and in accordance with the specified eligibility/selection criteria.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 104 - Award by the Academy of Finland of grants for research projects aiming at increasing competences in key sectors

Related Measure: P3C3I2 RDI funding package supporting the green transition – Accelerating key sectors and strengthening competence (Academy of Finland)

Quantitative Indicator: Number

Baseline: 0

Target: 25

Time: 30 June 2023

1. Context:

The investment is designed to boost RDI activities supporting the green transition, focusing on the key sectors and technologies of the green transition in order to promote the use and sharing of know-how and to improve the quality and effectiveness of partnerships and ecosystems. The measure consists of interventions to strengthen the existing research clusters, increase the level of expertise, including outside the existing research clusters, and to support the renewal of business activities.

The target consists of the Academy of Finland awarding at least 25 grants for research projects following the call launched in milestone 103. The projects are selected in accordance with the criteria indicated in milestone 103.

Target 104 is the first target of the investment, and it follows the completion of milestone 103 which concerns the publication by the Academy of Finland of a first call for applications for research projects aiming to increase competences in key sectors. Target 104 will be followed by target 105, expecting the completion of at least 90% of the key sector research projects awarded by the Academy of Finland under target 104. The investment has a final expected date for implementation on 30 June 2026.

2. Evidence provided:

Name of the evidence	Short description
1 Summary document	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.
2 Copy of the minutes of the General Subcommittee	The copy of the minutes of the General Subcommittee to show that the Academy of Finland (as the responsible authority) assessed the financed projects based on the eligibility/selection criteria
3 Copy of the grant award notifications	Copy of the grant award notification published on the website, including a date, the name of the call, and a link to the list of the successful applicants.
4 List of all selected projects	List of all selected projects and successful applicants of the two calls launched under the measure P3C3I2.
5 Administrative certificate from the	Administrative certificate from the Academy of Finland certifying that the funded projects comply with the 'Do no significant harm' Technical

	Academy of Finland	Guidance (2021/C58/01) by not supporting DNSH non-compliant activities and complying with the relevant EU and national environmental legislation
6	Copy of the terms of reference	Copy of the terms of reference (application instructions) containing the relevant selection and eligibility criteria, to prove compliance of selected projects with the CID requirements including the 'Do no significant harm' Technical Guidance (2021/C58/01), as specified in the CID Annex.
7	Publication of the calls for applications related to the key areas of green and digital transition: 1 st call open 11.8.2021 – 8.9.2021, 2 nd call open 6.4.2022 - 27.4.2022	A copy of the call texts of the first call launched by the Academy of Finland on 11 August 2021 and the second call launched by the Academy of Finland on 6 April 2022
8	Decision notifications	Funding decision notifications sent to successful applicants demonstrating the successful applicant, the date of the notification, the name of the call, the project/ consortium and the document reference

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

Notification by the Academy of Finland of the award of at least 25 grants for research projects selected in accordance with the criteria specified in milestone 103.

As shown in the minutes of the General Subcommittee meetings of the Academy of Finland (item 2 on the evidence list – Annex I), the Academy of Finland made decisions to award RRF funding to 29 consortia selected in accordance with the eligibility/selection criteria specified in milestone 103. The meeting minutes are linked to the two related calls through the identifier “Key areas of green and digital transition” (Vihreän ja digitaalisen siirtymän avainalat). Accordingly, the publication of the first call (item 7 on the evidence list, page 1) and the publication of the second, supplementary, call (item 7 on the evidence list, pages 14-28) both include the identifier “Key Areas of Green and Digital Transition”. The Academy of Finland published on its website the decision to fund 17 research consortia under the first call for research on key areas of green and digital transition on 15 December 2021 (item 3 of the evidence list, page 1). This first publication of a funding decision provides a link to a call of milestone 103 in its first paragraph specifying that the 17 consortia were funded under a call for research on “Key Areas of Green and Digital Transition”. It includes a link to the full list of projects selected for funding under the call (item 4 from the evidence list, page 1 – 3). A second publication concerns 12 more consortia selected for funding under the second call was issued on the website Academy of Finland on 13 December 2022 (item 3 of the evidence list, page 4), along with a link to the full list of 44 financing decisions concerning the 12 consortia selected for funding (item 4 from the evidence list, pages 4 – 15). This second publication of a funding decision provides a link to the second call in its first paragraph specifying that the 12 consortia were funded under the 2022 call for research on “key areas of green and digital transition”.

As a result of the above, a total of 29 grants have been awarded to the respective consortia out of 74 consortia applications submitted. The notification element is evidenced by the notification of decisions to grant awards (item 8 in the list of evidence). Furthermore, in the Application Details section on page 1, the decision notifications (item 8 in the list of evidence) contain the name of the call “Key Areas of Green and Digital Transition” and the date on which the funding application was submitted. The name of the call and the application date provide the explicit link to the first and the second, supplementary, call respectively.

The documentation of the funding decisions can be linked to the two related calls through the name of the call “key areas of green and digital transition” (“vihreän ja digitaalisen siirtymän avainalat”). The minutes of the General Subcommittee meeting evidence that the Academy of Finland, as the responsible authority, assessed the financed projects against the specific eligibility/ selection criteria. The minutes of the General Subcommittee meetings of 15 December 2021 (item 2 from the evidence list, page 20), 13 December 2022 (item 2 from the evidence list, page 94) and 12 January 2023 (starting page 155 of item 2 of the evidence list) evidence that the Academy of Finland as the responsible authority assessed the financed projects against the specific eligibility/ selection criteria, including the ‘Do no significant harm’ Technical Guidance (2021/C58/01) as specified in the CID Annex. In addition to the containing the name of the call, “key areas of green and digital transition” (“Vihreän ja digitaalisen siirtymän avainalat”), in brackets under the Application Details section, the decision notifications (item 8 in the evidence list) are dated and contain the date on which the funding application was submitted in the Application Details section on page 1. The date of application provides the explicit link to either the first or the supplementary call. Furthermore, the decision notifications (item 8 in the evidence list) contain in field “Consortium” in the Application Details section on page 1 the name of the project (/consortium) that received the funding.

All calls shall be based on the eligibility/selection criteria indicated in milestone 103.

Publication of the first call (item 7 on the evidence list pages 1-13, launched on 11 August 2021 and closed on 8 September 2021) focusing on the key sectors and technologies of the green transition in order to promote use and sharing of know-how and to improve the quality and effectiveness of partnerships and ecosystems was assessed in milestone 103 in payment request 1.

Item 7 on the evidence list, pages 14-28, shows that the supplementary call on the theme was launched on 6 April 2022 and closed 27 April 2022 (page 1) and is compliant with the eligibility/selection criteria reflected in milestone 103, in particular that:

- i) research is targeted at the low-carbon economy and climate change adaptation and resilience according to intervention field 022 in Annex VI of the RRF Regulation.

Item 7, on page 14, paragraph 1, states: “The present call will provide funding for research that promotes solutions related to carbon neutrality and adaptation to climate change as well as related digital technologies”.

- ii) The scheme shall be cutting across all branches of science and sectors including hydrogen economy, high-value bioproducts and emission-free energy systems and competences in data analysis and social sciences. Furthermore, in line with the measure description, **the eligibility/selection criteria shall require that research is targeted at the low-carbon economy and climate change adaptation and resilience. The scheme shall be cutting across all branches of science and sectors including**

hydrogen economy, high-value bioproducts and emission-free energy systems and competences in data analysis and social sciences.

The scheme cuts across all branches of science and includes the strengthening and enhancing of research clusters, partnerships, ecosystems and/or RDI actors (item 7 in the evidence list, page 14, page 15, page 24 (sub-heading “Review Criteria”), and page 26 (under the first bullet point of the section concerning the Frequently Asked Questions)).

The call did not mention hydrogen economy, high-value bioproducts and emission-free energy systems and competences in data analysis and social sciences. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, these were not mentioned specifically with the intention to not restrict applications to these specific areas only, as it aimed at encouraging a broad range of applications that promote the green and digital transition, including in relation to hydrogen economy, high-value bioproducts and emission-free energy systems and competences in data analysis and social sciences. The call for applications calls for research that promotes solutions related to carbon neutrality and adaptation to climate change as well as related digital technologies, therefore using a broader terminology which covers the same objective. Item 5, the administrative certificate from the Academy of Finland, demonstrates that the selected projects are under these domains. For example:

- The project “Microalgae Digital Applications (MIDAS)” contributes towards the hydrogen economy by focusing on the production of hydrogen gas through optimized microalgae cultivation.
- The project “Materials Development for Flow Batteries with Help of Explainable AI (FlowXAI)” aims to develop sustainable battery technologies for renewable energy storage, thereby contributing to emission-free energy systems. The project uses machine learning therefore utilising competences in data analysis.
- The “MIMIC” project aims to enhance the understanding of lignocellulosic materials, which are essential for producing high value bioproducts.
- The project “Digitally mediated decarbon communities in energy transition (DigiDecarbon)” investigates the dynamics of digitally enabled energy communities, thereby enhancing competences in social sciences through the analysis of community engagement in energy transitions.

As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

The eligibility/selection criteria of the call requires that the research is targeted at promoting solutions related to carbon neutrality and adaptation to climate change as well as related digital technologies, strengthening competence clusters in the thematic area and promoting competence development outside the clusters (item 7). The call does not make explicit reference to climate change resilience. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, it is understood that adaptation and resilience are both included in the reference to ‘climate change adaptation’. The Finnish authorities have explained that the Academy of Finland makes use of the “International Panel on Climate Change (IPCC)” definition of climate change adaptation, as described on the website of IPCC (<https://archive.ipcc.ch/ipccreports/tar/wg2/index.php?idp=643>). As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the

investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

- iii) The eligibility criteria shall also ensure that the selected projects comply with the 'Do no significant harm' Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation.

The copy of the terms of reference (document 6 in the evidence list, page 19) presents the DNSH criteria requiring that, in addition to the requirement of projects complying with the relevant EU and national environmental legislation, the projects to be funded must comply with the 'Do No Significant Harm' (DNSH) principle, which states that projects must not cause significant harm to the six environmental objectives defined in the EU Taxonomy Regulation. The six objectives and the exclusion list items are listed in this section and links are provided to further information on DNSH, including to Annex III of the Do no significant harm' Technical Guidance (2021/C58/01). Applicants are informed that they must describe their compliance with and commitment to the DNSH principle in the application through a specific form (with link provided) and, after the call has closed, the Academy may also require a separate account on compliance with the DNSH principle to support decision-making.

Furthermore, in line with the measure description, **the measure consists of interventions to strengthen the existing research clusters, increase the level of expertise, including outside the existing research clusters, and to support the renewal of business activities.**

The first page of the second call for applications (item 7, pages 14-28) specifies that the call promotes solutions related to carbon neutrality and adaptation to climate change as well as related digital technologies and its goal is to strengthen existing competence clusters in this thematic area but also to promote competence development outside the clusters. According to the call instructions, competence clusters are characterised by strong research expertise, generation of impact and active collaborations with end-users of research results which includes businesses. The support for the renewal of business activities is further supported by the example of the "leading companies and ecosystems" as an example of a competence cluster which aim to also support the renewal of business activities.

Furthermore, in line with the measure description, **the investments in RDI of key sectors and technologies shall also enhance partnerships and ecosystems of RDI actors. The measure shall provide support to research organizations, such as higher education institutions or research institutes.**

The second call for applications (item 7 of the evidence list, pages 14-28) describes how the eligibility criteria also include the strengthening and enhancing of research clusters, partnerships, ecosystems and/or RDI actors, and the increase of the level of expertise, including outside the existing research clusters. This is substantiated, for example, on page 16 of item 7 under the section "Who can apply?". The section explains that the funding can be applied for by multidisciplinary consortia of two or more research teams, where the consortium parties bring expertise in both green and digital transition. The applicant consortium must collaborate with different actors and end-users of research results. The consortium parties may be based at one or more research organisations. A

consortium application is an application built around a joint research plan, where each party to the consortium applies for funding. Further evidence is also provided in the same document on page 24 (sub-heading “Review Criteria”). In addition, the call invites applications from all fields and encourages the applicants to approach the topic broadly, utilising relevant national or international networks (item 7, page 15). The call instructions also make explicit reference to providing funding for research organisations such as higher education institutions or research institutes (for example, item 7, page 17).

The target is further specified in the Operational Arrangements, which requires that the compliance with the ‘Do no significant harm’ Technical Guidance (2021/C58/01) through the use of an exclusion list shall be ensured by way of: (i) administrative certificate from the Academy of Finland certifying that the funded projects comply with the ‘Do no significant harm’ Technical Guidance (2021/C58/01) by not supporting DNSH non-compliant activities and complying with the relevant EU and national environmental legislation; and [...]

The Administrative certificate from the Academy of Finland (item 5 from the evidence list) certifies that all funded projects comply with the ‘Do no significant harm’ Technical Guidance (2021/C58/01) by not supporting DNSH non-compliant activities and complying with the relevant EU and national environmental legislation. The certificate refers to the measure in its subject line “P3C3I2 Research Projects Promoting Green and Digital Transition” (page 1 of item 5 from the evidence list) and contains the project names providing a link to the other list of the selected projects and decision notifications.

[...] (ii) documentation including copy of the terms of reference (application instructions) containing the relevant selection and eligibility criteria and, where necessary, Funding Memos, to prove compliance of selected projects with the CID requirements including the ‘Do no significant harm’ Technical Guidance (2021/C58/01) as specified in the CID Annex. The documentation shall include for awarded projects with activities under the EU ETS, the projected level of GHG emissions per unit of product and a list with the EUTL identifier numbers.

The documentation provided by the Finnish authorities, including the copy of the terms of reference (item 6 from the evidence list) contain all the relevant selection and eligibility criteria to prove compliance of selected projects with the CID requirements including the ‘Do no significant harm’ Technical Guidance (2021/C58/01) as specified in the CID Annex. No projects were awarded with activities under the EU ETS (see item 5 from the evidence list, page 1).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 107 - Award by Business Finland of grants for RDI projects aiming at increasing competences in key sectors

Related Measure: P3C3I3 - RDI funding package supporting the green transition – Accelerating key sectors and strengthening competence (Business Finland)

Quantitative Indicator: Number

Baseline: 0

Target: 10

Time: Q4 2023

1. Context:

The objective of this investment is to boost RDI activities supporting the green transition, focusing on the key sectors and technologies of the green transition to promote utilisation and sharing of know-how and to improve the quality and effectiveness of partnerships and ecosystems. The scheme cuts across all branches of science and sectors including the hydrogen economy, high-value bioproducts and emission-free energy systems and competences in data analysis and social sciences related to resilience and adaptation to climate change.

Target 107 requires Business Finland to notify of the award of at least 10 grants for RDI projects selected in accordance with the eligibility/selection criteria specified in the call for applications which requires that research is targeted at the low-carbon economy and climate change adaptation and resilience. Compliance with the 'Do no significant harm' Technical Guidance is verified through the use of an exclusion list.

Target 107 is the first target of the investment, and it follows the completion of milestone 106 related to the launch of call for applications. It will be followed by target 108, related to the completion of the awarded projects. The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Summary regarding assessment of the financed projects	The evidence provided is a summary by the responsible authority, showing that the assessment of the financed projects has been made against the requirements of each call launched under this measure
3-53	Copies of the grant award notifications.	The evidence provided is a copy of the grant award notification evidencing the successful applicant, date and the reference of the document.
54	List of selected projects	The evidence provided is a list of projects selected under calls launched for this measure and the

respective successful applicants, extracted from the BF database.

55-105	Copies of the funding memos	The evidence provided is a copy of the funding memo showing that the assessment undertaken in the selection of projects complies with the milestone requirements.
106	Mandatory instructions for assessment	Business Finland's mandatory instructions for assessment of companies' RDI grant applications
107	Call instructions	Call instructions published together with the call for projects

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the target.

Notification by Business Finland of the award of at least 10 grants for RDI projects [...]

Grant award notifications (items 3-53) show that selected projects have been notified of awarded grants and include the detailed information of successful applicants, dates and the reference of the documents.

As shown in the list of selected projects (item 54), including the reference numbers, organisation names, amounts of awarded funding, date of funding and the application period, Business Finland has awarded 51 grants for projects under the leading company partnership funding call for companies and research institutions, thus exceeding the goal of target 107 by 41.

[...] selected in accordance with the eligibility/selection criteria specified in milestone 106.

Business Finland has made the assessment of the financed projects against the requirements of the call, defined and assessed in milestone 106.

Item 2 of the evidence list is a summary produced by Business Finland of the assessment of the financed projects according to the eligibility/selection criteria specified in milestone 106. The evaluation and selection of projects have been done by Business Finland's experts who used an internal manual for the evaluation (item 106). The manual contains all the required eligibility criteria, and its compliance is mandatory in funding decisions. The evaluation panel has prepared a funding memo (items 55-105) for each project to describe the fulfilment of the eligibility criteria. The assessed call for applications included instructions for the applicants to use the identifier RRF-Key sectors of the future and partnership projects of leading companies (*RRF-Tulevaisuuden avainalat ja vetureiden kumppanuushankkeet*) in Finnish (page 5 of the call instructions, item 107). The funding memos (items 55-105), under the section Financing proposal (*Rahoitusesitys*) (Financing proposal), refer to the same identifier RRF- Key sectors of the future and partnership projects of leading companies (*RRF-Tulevaisuuden avainalat ja vetureiden kumppanuushankkeet*) on the row of RRF Programme (*RRF-Ohjelma*). These together demonstrate that the grants were awarded through the call assessed in milestone 106 in accordance with the specified eligibility/selection criteria.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 110 - Award of grants for support to innovative growth companies

Related Measure: P3C3I4 - RDI funding package supporting the green transition – Supporting innovative growth companies

Quantitative Indicator: Number

Baseline: 0

Target: 22

Time: Q4 2023

1. Context:

The investment provides targeted support to companies with high growth potential that develop solutions for the green transition, to boost the growth of companies already engaged in exports and to increase the number of export companies.

Target 110 requires Business Finland to notify the award of at least 22 grants for support to innovative growth companies in accordance with the eligibility/selection criteria specified in milestone 109 that requires research to be targeted at the low-carbon economy and climate change adaptation and that the selected projects comply with the 'Do no significant harm' Technical Guidance (2021/C58/01).

Target 110 is the first target of the investment, and it follows the completion of milestone 109 related to the launch of call for applications. It will be followed by target 111, related to completion of the awarded projects. The investment has a final expected date for implementation by 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Summary regarding assessment of the financed projects	Summary by Business Finland regarding its assessment of the financed projects against the requirements of each call launched under this measure
3-46	Grant award notifications	Copy of the grant award notifications evidencing the successful applicants, date and the reference of the document
47	List of all selected projects	List of all selected projects for all calls launched under this measure and successful applicants
48-91	Funding memos	Funding memos, to prove connection between the selected projects and the call for application
92	Mandatory instructions for assessment	Business Finland's mandatory instructions for assessment of companies' RDI grant applications
93	Call instructions	Call instructions published together with the call for projects

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the target.

Notification by Business Finland of the award of at least 22 grants for support to innovative growth companies [...]

According to the list of all selected projects (item 47) and the grant award notifications (items 3-46), Business Finland awarded grants to 44 innovative growth companies, thus exceeding the goal of target 110 by 22. The requirement for the beneficiaries to be innovative growth companies is part of the eligibility/selection criteria specified and assessed in milestone 109, and the fulfilment of these requirements is explained below. The grant award notifications (items 3-46) prove that selected applicants have been notified of awarded grants for their projects and include the detailed information of successful applicants, dates and a unique identifier which can be used to link each grant award to the corresponding funding memo (items 48-91).

[...] in accordance with the eligibility/selection criteria specified in milestone 109.

Item 2 of the evidence list is a summary produced by Business Finland of the assessment of the financed projects according to the eligibility/selection criteria specified in milestone 109. The evaluation and selection of projects has been done by Business Finland's experts who used an internal manual for the evaluation (item 92). The manual contains all the required eligibility criteria, and its compliance is mandatory in funding decisions. The evaluation panel has prepared a funding memo (items 48-91) for each project to describe the fulfilment of the eligibility criteria. The call for applications (item 93) included instructions for the applicants to use the identifier "RRF innovation support for growth companies" (*RRF-Kasvuyritysten innovaatiotuki*) in their applications submitted under this call. The funding memos (items 48-91), under the financing proposal (*rahoitusesitys*) section, refer to the same identifier "RRF innovation support for growth companies", thus linking the awarded grants to the assessed call. Together this demonstrates that the grants were awarded through the call assessed in milestone 109 in accordance with the specified eligibility/selection criteria including the requirement for the beneficiaries to be innovative growth companies.

Commission Preliminary Assessment: Satisfactory fulfilled.

Number and name of the Target: 119 - Award of grants for the development of innovation infrastructures

Related Measure: P3C3I7 - Promoting innovation and research infrastructure – Competitive funding for innovation infrastructures

Quantitative Indicator: Number

Baseline: 0

Target: 3

Time: Q4 2023

1. Context:

The investment provides support to develop innovation and research infrastructures needed for the development and testing of solutions that promote carbon neutrality and digitalisation in genuine user conditions.

Target 119 requires Business Finland to notify the award of at least 3 grants to innovation and research infrastructures for projects selected in accordance with the eligibility/selection criteria specified in milestone 118. The eligibility/selection criteria require interventions to focus on promoting elements linked to the digitalisation of business and to ensure that the selected projects comply with the 'Do no significant harm' Technical Guidance through the use of an exclusion list

Target 119 is the first target of the investment, and it follows the completion of milestone 118, which concerns the publication of a call for applications. It will be followed by target 120, related to the completion of projects. The investment has a final expected date for implementation of 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements, as listed in the description of the milestone and of the corresponding measure in the CID annex) was satisfactorily fulfilled.
2	BF Summary presenting the assessment of the financed projects	Summary by Business Finland regarding its assessment of the financed projects against the requirements of each call launched under this measure
3 – 23	Copies of the grant award notification (Business Finland).	The evidence provided is a copy of a grant award notification evidencing the successful applicant, date and the reference of the document
24	List of all selected projects.	The full list of projects and the respective successful applicants selected by Business Finland under calls launched for this measure. extracted from a Business Finland database
25 – 45	Funding memos (Business Finland)	Funding memos, to prove connection between the selected projects and the call for application and to

prove compliance of selected projects with the CID requirements including the 'Do no significant harm' Technical Guidance (2021/C58/01) as specified in the CID Annex

Call instructions published together with the call for projects

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the target.

Notification by Business Finland of the award of at least 3 grants for projects selected [...]

Business Finland has awarded 21 grants for projects under the call. This is evidenced by 21 grant award notifications (items 3-23) which contain detailed information about the successful applicants and dates and the references of the notification documents. The grant award notifications are in line with the full project list (item 24 on the evidence list).

Furthermore, the summary of the assessment of the financed projects (item 2) explains on page 1 that, in the one call related to this investment (call open 18.3.2022-23.5.2022), 21 projects were selected for a total of value of EUR 19 872 211 awarded.

Additionally, the 21 grant award notifications reflect the list of all selected projects by Business Finland with the names of the successful applicants and awarded grants (item 24).

[...] in accordance with the eligibility/selection criteria specified in milestone 118.

Item 2 of the evidence list includes a summary document by the responsible authority, Business Finland, as evidence that the assessment of the financed projects has been made against the requirements of the one single call launched under this measure and assessed in milestone 118. Starting from page 2, the section on the assessment of the project's funding eligibility ("*Hankkeen rahoituskelpoisuuden arviointi*") describes that Business Finland based the project assessment on the criteria specified in the call and relevant milestone. Business Finland documented each project assessment in project-specific funding memos that have been provided as items 25-45 in the list of evidence. The funding memos contain a reference to the concerned RRF investment in the form of identifier "RRF innovation infrastructures" ("*RRF-Innovaatioinfrastruktuurit*") in field RRF Programme ("*RRF-Ohjelma*"). As there was only one call for the "*RRF-Innovaatioinfrastruktuurit*" investment, consequently this field also provides a unique link to the one call under the concerned investment. As the RRF programme identifier is indicated in both the call for applications documents and the funding memos under the heading "Financing proposal" ("*Rahoitusesitys*") in the line "RRF-Programme" (*RRF- Ohjelma*), all funding decisions can be linked to the call for applications with their RRF programme identifier "RRF innovation infrastructures" ("*RRF-Innovaatioinfrastruktuurit*"). The assessed call for applications included instructions for the applicants to use the identifier "RRF innovation infrastructures" ("*RRF-Innovaatioinfrastruktuurit*") (page 17 of the call instructions, item 46). Together this demonstrates that the grants were awarded through the call assessed in milestone 118 in accordance with the specified eligibility/selection criteria.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 125 - Award of grants for all projects under key programmes for international growth

Related Measure: P3C4I2 Key programmes for international growth

Qualitative Indicator: Notification of the award of all grants

Time: Q4 2023

1. Context:

The objective of this investment is to support international growth of companies by means of specific development grants. Milestone 125 concerns the notification of the award of grants for projects selected under key programmes for international growth. All calls shall be based on the eligibility/selection criteria indicated in milestone 124.

Milestone 125 is the second milestone of the investment, and it follows the completion of milestone 124 related to the launch of calls for applications. It will be followed by target 126, related to completion of at least 40 projects.

The investment has a final expected date for implementation on 31 December 2025.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2-11	Grant award notifications related to health and wellbeing competence and technology by Business Finland	Grant award notifications demonstrating the successful applicant, date, and the document reference
12-14	Grant award notifications related to low-carbon, circular economy and digital renewal in industry and increase of exports of industrial services by Business Finland	Grant award notifications demonstrating the successful applicant, date, and the document reference
15-24	Funding memos related to health and wellbeing competence and technology by Business Finland	Funding memos confirming the assessment and selection of projects comply with the milestone requirements
25-27	Funding memos related to low-carbon, circular economy and digital renewal in industry and increase of exports of industrial services by Business Finland	Funding memos confirming the assessment and selection of projects comply with the milestone requirements
28	Call instructions related to health and wellbeing competence and technology, published on 1 November 2021	Call instructions showing that the eligibility criteria fully align with the milestone descriptions.

	and closed 31 January 2022, by Business Finland	
29	Call instructions related to low-carbon, circular economy and digital renewal in industry and increase of exports of industrial services, published on 21 January 2022 and closed 30 June 2022, by Business Finland	Call instructions showing that the eligibility criteria fully align with the milestone descriptions. Also available at the Business Finland website: https://www.businessfinland.fi/48efe7/globalassets/finnish-customers/02-build-your-network/bioeconomy--cleantech/biocircular-finland/funding-call-for-low-carbon-circular-economy-digitalization-and-service-development-final.pdf
30	Call instructions related to supplementary call for health and wellbeing competence and technology, published on 15 August 2022 and closed 17 October 2022, by Business Finland	Call instructions showing that the eligibility criteria fully align with the milestone descriptions. Also available at Business Finland website: https://www.businessfinland.fi/4a34ff/globalassets/finnish-customers/news/calls/2022/terveys-ja-hyvinvointi-rrf-hakuilmoitus2_2022-2023_en.pdf
31	Publication of the call for applications related to low carbon built environment, published on 2 December 2022 and closed 14 April 2023, by Business Finland	Publication of a shared call for applications for low carbon built environment ("<i>RRF-Vähähiilinen rakennettu ympäristö</i>") and low-carbon, circular economy and digital renewal in industry and increase of exports of industrial services ("<i>RRF-Teollisuuden vähähiilinen kiertotalous, digitalisaatio ja palvelukehitys</i>") demonstrating that the call was open, and the publication includes full instructions for applicants Also available at the Business Finland website: https://www.businessfinland.fi/ajankohtaista/haut/2021/vahahiilinen-rakennettu-ymparisto--innovaatiorahoitushaku
32	Call instructions related to low carbon built environment, instructions published on 23 August 2021 and updated 21 November 2022 and 21 February 2022, by Business Finland	Call instructions of a shared call for applications for low carbon built environment ("<i>RRF-Vähähiilinen rakennettu ympäristö</i>") and low-carbon, circular economy and digital renewal in industry and increase of exports of industrial services ("<i>RRF-Teollisuuden vähähiilinen kiertotalous, digitalisaatio ja palvelukehitys</i>") showing that the eligibility criteria fully align with the milestone descriptions. Also available at the Business Finland website: https://www.businessfinland.fi/4926a3/globalassets/finnish-customers/news/calls/2023/rrf-vahahiilinen-rakennettu-ymparisto-haku_2023.pdf
33-45	Grant award decisions by Traficom	Grant award decisions demonstrating the successful applicant, date, document reference and justification for granting the aid
46	List of grants awarded by Traficom	List of grants awarded evidencing successful applicants under calls launched for intervention ii) and references to grant award

		decisions Publication of the grants of the first call for applications concerning electric heavy-duty vehicle transport ecosystem
47	Publication of the grants of the first call by Traficom	Also available at the Traficom website: https://traficom.fi/fi/ajankohtaista/kuudelle-hankkeelle-38-miljoonaa-euroa-avustusta-sahkoisen-raskaan-liikenteen Publication of the grants of the second call for applications concerning electric heavy-duty vehicle transport ecosystem
48	Publication of the grants of the second call by Traficom	Also available at the Traficom website: https://traficom.fi/fi/ajankohtaista/sahkoisen-raskaan-liikenteen-valtionavustuksia-jaettu-12-miljoona-euroa-toisella
49	List of selected projects by by The Centre for Economic Development, Transport and the Environment (<i>hereinafter referred to as "ELY Centre"</i>)	A list of selected projects evidencing successful applicants and projects selected under calls launched for interventions i) and iii) and successful applicants, showing that all grants have been awarded
48-63	Grant award decisions by ELY Centre	Grant award decisions demonstrating the successful applicant, date, and the document reference and evidencing that the assessment and selection of the project comply with the milestone requirements
64	The first call instructions by ELY Centre, published on 8 February 2022 and closed 29 April 2022	First call instructions showing that the eligibility criteria fully align with the milestone descriptions
65	The second call instructions by ELY Centre, published on 10 January 2023 and closed 17 March 2023	Second call instructions showing that the eligibility criteria fully align with the milestone descriptions
66	The third call instructions by ELY Centre, published on 15 September 2023 and closed 31 October 2023	Third call instructions showing that the eligibility criteria fully align with the milestone descriptions
67	The first call instructions by Traficom, published on 20 June 2022 and closed 30 September 2022	First call instructions showing that the eligibility criteria fully align with the milestone descriptions
68	The second call instructions by Traficom, published on 6 March 2023 and closed 10 May 2023	Second call instructions showing that the eligibility criteria fully align with the milestone descriptions
69	Extract from Traficom's case management system Tweb	Extract from Traficom's case management system Tweb to evidence that the grant award decisions were sent to beneficiaries
70	Screenshots from ELY-centre's General Grants System (<i>hereinafter referred to as "GSS"</i>)	Screenshots from and explanation of the functionalities of ELY-centre's GSS

71	ELY-centre's application process description	Description of the electronic transactions in the regional government's online service and processing transactions in the GSS
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3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the milestone.

Notification of the award of all grants for projects selected under the calls for applications.

Altogether 40 grants award decisions or notifications have been sent under the calls for applications as follows:

- i. Business Finland notified the award of grants for three projects (items 12-14), which were chosen under the two calls (items 29 and 31) for industrial projects related to low-carbon circular economy, digitalization, and service exports assessed above. One project received a grant award notification (item 12) under the first call launched 21 January 2022 and closed 30 June 2022 (item 29). The successful project can be linked to the first call for applications (item 29) through the RRF identifier and the date of application indicated in the funding memo (item 26: page 6). The applicants were instructed to use the RRF identifier "Funding call for industrial projects related to low-carbon circular economy in industry, digitalisation and service development" (*RRF-Teollisuuden vähähiilinen kiertotalous, digitalisaatio ja palvelukehitys*) (item 29: page 5, section 8; How to apply for funding?) which the applicant selected under the first call as indicated in the funding memo (item 25: page 6; section; *RRF-Ohjelma*). Additionally, the date of application mentioned in the funding memo (item 25: page 6, section; *Hakemus*) falls within the application period, which was launched on the date indicated in the page header and closed on date indicated in the page five, section nine "Funding schedule", of the call instructions (item 29).

Two projects received a grant award notification under the supplementary funding call (item 31) launched 18 August 2022 and closed 17 October 2022. The successful projects can be linked to the supplementary call for applications (item 31) through the "Financing aid" section (*Rahoituspäättös*) and the dates of application indicated in the funding memos (items 26 and 27: page 6). The applicants were instructed to use the RRF identifier "RRF low-carbon circular economy, digitalization, and service exports 2023 renewed T32.20.40.3.20" (*RRF Teollisuuden vähähiilisyys, kiertotalous, digitaalisuus ja teollinen palveluvienti 2023 uusittu T32.20.40.3.20*) which the projects selected under the supplementary call indicated in the funding memos under the "financing decision" section (items 26 and 27: page 7). Additionally, the date of application mentioned in the funding memo (items 26 and 27: page 7, section; *Hakemus*) falls within the application period indicated for the publication of the call for applications (item 31).

Finally, a unique project identifier and the date of the decision are included in the main heading of all grant award notifications (12-14: page 1) selected under the call for applications for low-carbon circular economy, digitalization, and service exports. The RRF identifier is provided in the top corner of all funding memos (items 25-27) allowing for the funding memos and grant award decisions to be linked. Finally, the grant award notifications (items 12-14) include the name of the successful applicant, the date and the reference of the document, proving that Business Finland gave a notification of the grants awarded to the

successful projects selected under the call for applications for low-carbon circular economy, digitalization, and service exports.

- ii. According to the grant award decisions (items 33-45) concerning electric heavy-duty vehicle transport ecosystem, Traficom awarded 11 grants in total. The beneficiaries have been notified of the award of grants by sending the decisions (items 33-45) to the beneficiaries as evidenced by the extract from Traficom's case management system, item 69. The Commission services conducted a virtual on-the-spot check on 26 September to verify the information in the extract. This check was completed successfully, confirming the notification of the award of all grants for projects selected under the calls for applications concerning electric heavy-duty vehicle transport ecosystem. The publications of the grants on Traficom's website (item 47 and 48) evidence under which call each project was chosen. The funding calls (item 66 and 67) are titled "Electric heavy-duty vehicle grants" (*Sähköisen raskaan liikenteen valtionavustus*) and the reference used in the grant award decisions (items 33-43) is "Call for electric heavy-duty vehicle grants" (*Sähköisen raskaan liikenteen valtionavustushaku*) which can be used to link the grant award decisions to the calls.
- iii. Business Finland notified of the award of grants for 10 projects chosen under the two calls for health and wellbeing competence and technology assessed above (items 28 and 30). Seven projects received a grant award notification (items 2-8) under the call launched 1 November 2021 and closed 31 January 2022 (item 28). The successful projects can be linked to the first call for applications (item 28) through the RRF identifier and the date of application indicated in the funding memos (items 15-21: page 6). In the call instructions the applicants were instructed to use the RRF identifier "RRF Health and Wellbeing" (*RRF-Terveys ja hyvinvointi*) (item 28: page 2, section: *How to apply for funding?*) which the beneficiaries selected under the first call as indicated in the funding memos (items 15-21: page 6, section; "*RRF-Ohjelma*" (*RRF Programme*)). Additionally, the application dates mentioned in the funding memos (items 15-21: page 6) falls within the application period, which was launched on the date indicated in the page header and closed on the date indicated on page 3 of the call instructions (item 28).

Three projects received a grant award notification (items 9-11) under the supplementary call (item 30) for health and wellbeing competence and technology launched 15 August 2022 and closed 17 October 2022. The grant award notifications (items 9-11) can be linked to the supplementary call for applications (item 30) through the RRF identifier and the date of application indicated in the funding memos (items 22-24: page 5-6). The applicants were instructed to use the RRF identifier "RRF Health and Wellbeing" (*RRF-Terveys ja hyvinvointi*) (item 30: page 3, section; *How to apply for funding?*) which the beneficiaries selected under the supplementary call as indicated in the funding memo (items 22-24: page 5-6, section; "*RRF-Ohjelma*" (*RRF Programme*)). Additionally, the application dates mentioned in the funding memos (items 22-24: section; Application (*Hakemus*)) fall within the application period, which was launched on the date indicated in the page header and closed on the date indicated on page 3 of the call instructions (item 30).

Finally, all grant award notifications (items 2-11) under the calls for health and wellbeing competence and technology are linked to a specific funding memo (items 15-24). A unique identifier number of the project and the date of the decision are included in the main heading of the grant award notifications. The same identifier is also provided in the top corner of funding memos (items 15-24). Finally, grant award notifications (items 2-11) demonstrate the successful applicant, date and the reference of the document, proving that

Business Finland gave a notification of the grants awarded to the successful projects selected under the call for applications for health and wellbeing competence and technology.

- iv. According to the list of selected projects (item 47) ELY-Centre awarded grants for 16 projects following the three calls (items 64-66) assessed above under the programme for growth and exports of water expertise. Initially, 7 projects were awarded grants under the first call launched 8 February 2022 and closed 29 April 2022, as evidenced by the grant application date (items 48-54: page 1) which corresponds to the dates of the call (item 64). Additionally, 8 projects were awarded grants under the second call launched 10 January 2023 and closed 17 March 2023, as evidenced by the grant application date (items 55-62: page 1) which corresponds to the dates of the call (item 65). Lastly, 1 project (item 63) was awarded a grant under the third call launched 15 August 2023 and closed 31 October 2023, as evidenced by the grant application date (item 63: page 1) which corresponds to the dates of the call (item 66).

The beneficiaries have been notified once the decision has been made in the GSS of the award of grants by an automatic email from GSS that a decision has arrived in the system as explained in item 71, ELY-centre's application process description and item 70, in the explanation of the screenshots from ELY-centre's GSS. The information on the name of the main applicant, the name of the project and the date of the decision are aligned between the grant award decisions (items 48-63) and the GSS (item 71). Furthermore, it can be evidenced that the beneficiaries have been notified of the award of grants since in the screenshots in item 70, each of the beneficiaries have uploaded further documentation related to the implementation of the projects, such as interim payment applications. As explained in item 70, the uploading of such documentation is only possible once the notification email of the grant award decision has been sent to the applicant. The Commission services conducted a virtual on-the-spot check on 26 September to verify the information in the screenshots in item 70. This check was completed successfully, confirming the notification of the award of all grants for projects selected under the programme for growth and exports of water expertise.

Additionally, all grant award decisions (items 48-63: page 1) can be linked to the calls for applications (items 64-66) through the RRF programme identifier "Programme for Growth and Exports of Water Knowledge" (*Vesiosaamisen kasvu- ja vientiohjelma*) which is indicated in the grant award decision under the heading "Decision – resolution of the ELY centre" (*Päätös – ELY-keskuksen ratkaisu*).

All calls shall be based on the eligibility/selection criteria indicated in milestone 124.

Corresponding evidence is provided by three institutions a) Business Finland, b) the Finnish Transport and Communications Agency (*hereinafter referred as "Traficom"*) and c) the Centre for Economic Development, Transport and the Environment (*hereinafter referred as "ELY-Centre"*) who launched 4 calls which were assessed in 124 and later also 5 supplementary calls or extended the running calls as follows:

- i. Publication of the first call related to the promotion of low-carbon, circular economy and digital renewal in industry and increase of exports of industrial services launched on 21 January 2022 and closed on 30 June 2022 was assessed in milestone 124 (related call

instructions, item 29). Publication of the supplementary call (item 31) under the theme was launched on 2 December 2022 and closed 14 April 2023.

- ii. Publication of the call for promoting development of electric heavy-duty vehicle transport launched on 20 June 2022 and closed on 30 September 2022 was assessed in milestone 124. Publication of the second call under the same theme launched on 6 March 2023 and closed 10 May 2023 (item 68).
- iii. Publication of the call for health and wellbeing expertise and technology launched on 1 November 2021 and closed on 31 January 2022 (item 28) was assessed in milestone 124. Publication of the supplementary call (item 30) for health and wellbeing competence and technology launched on 15 August and closed 17 October 2022. In line with the eligibility/selection criteria indicated in milestone 124, the calls for applications for health and wellbeing expertise and technology are in support of the Health Sector Growth Strategy's roadmap. According to the publication of the call for health and wellbeing competence and technology (item 28: page 1), the results of the projects must promote the measures defined in the new roadmap of the health sector's growth strategy that strengthen the health sector's ecosystems and exports.
- iv. Publication of the first call under the programme for growth and exports of water management expertise launched on 8 February 2022 and closed on 29 April 2022 was assessed in milestone 124 (item 64). Publications of the second (item 65) and third (item 66) calls under the same theme launched on 10 January 2023 and 15 September 2023, and closed 17 on March 2023 and 31 October 2023, respectively.

The dimension of international growth was emphasised in all of the calls as follows:

- i. Under the call instructions for industrial projects related to low-carbon circular economy, digitalization, and service exports (item 31) "The aim of the funding call is to significantly increase industrial low-carbon and circular economy solutions, the digital renewal of industries, as well as industrial service exports while also taking groundbreaking and new technologies into account" (item 31: page 1).
- ii. Under call instructions for the second call for promoting development of electric heavy-duty vehicle transport (item 68): *"However, the research is also intended to lay the foundations for possible international growth"*.
- iii. Under call instructions for health and wellbeing competence and technology (item 30, section: Description of the call/funding call): *"The funding call is aimed at companies seeking international growth"*.
- iv. The call instructions for growth and internationalisation of water expertise (items 65 and 66, page 1) mention a focus of the call being on internalisation.

Furthermore, according to description of milestone 124, the eligibility criteria shall ensure that projects comply with the 'Do no significant harm' Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation.

- i. In the case of the supplementary call to promote low-carbon, circular economy and digital renewal in industry and to increase exports of industrial services, the full eligibility criteria is

set out in the call instructions (terms of reference) (item 32: page 2-3) which include the "Do no significant harm" Technical Guidance (2021/C58/01), the exclusion list, and the requirement for compliance with the relevant EU and national environmental legislation under the section "Specific criteria for the Finnish Sustainable Growth Programme (RRF funding)".

- ii. In the case of the second call concerning electric heavy-duty vehicle transport ecosystem, the exclusion list and the requirement of compliance with the relevant EU and national environmental legislation are included in the full set of the eligibility criteria outlined in the call instructions (terms of reference) under the sections "Eligible projects and their requirements" and "Key applicable regulations and guidelines", item 68 on the list of evidence.
- iii. In the case of the supplementary call concerning health and wellbeing competence and technology, the full eligibility criteria is set out in the call instructions (terms of reference) (item 30) which include the "Do no significant harm" Technical Guidance (2021/C58/01), the exclusion list, and the requirement of compliance with the relevant EU and national environmental legislation under the section "Special criteria for RRF funding under the Sustainable Growth Program for Finland" and specified in Annex 1 and Annex 2.
- iv. In the case of the second and third call concerning growth and internationalisation of water expertise, the exclusion list and the requirement of compliance with the relevant EU and national environmental legislation are included in the full set of eligibility criteria outlined in the call instructions (terms of reference) (items 65 and 66: page 3-4) under the section "Project evaluation".

4. Commission Preliminary Assessment: Satisfactory fulfilled.

Number and name of the Milestone: 134 - Entry into force of the additional legal framework completing the establishment of welfare areas and the reform of the social and health care and rescue services.

Related Measure: P4C1.R1 Preparation of the social welfare and health care reform in support of implementing the care guarantee.

Qualitative Indicator: Provisions in the additional legislative acts indicating their entry into force.

Time: Q1 2023

1. Context:

As part of the preparation of the social and healthcare reform, the objective of this measure is to improve the accessibility of health and social services by promoting the implementation of the care guarantee.

Milestone 134 concerns the entry into force of the second set of legislative acts completing the establishment of welfare areas and the reform of the social, healthcare and rescue services.

Milestone 134 is the second milestone of the reform, and it follows the completion of milestone 133 on the entry into force of the first set of legislative acts setting out the establishment of welfare areas and the reform of the social, healthcare and rescue services. It will be followed by milestone 135, related to the operationalisation of regional welfare areas. The reform has a final expected date for implementation by 30 June 2023.

2. Evidence provided:

Name of the evidence	Short description
1 Summary document	Summary document duly justifying how the milestone was achieved.
2 Act on the implementation of the reform concerning healthcare, social welfare and rescue services and the implementation of related legislation (616/2021)	The Act lays down provisions on the establishment of welfare areas, the transfer of responsibility for organising healthcare, social welfare and rescue services, matters related to the implementation of the reform and the entry into force of legislation related to the reform.
	The Act was published in the national Official Journal (SDK 616/2021, of 30 June 2021) and entered into force on 1 July 2021. https://www.finlex.fi/fi/laki/ajantasa/2021/20210616
3 Act on welfare areas (611/2021)	Among other things, the Act lays down provisions on the administrative procedure, bodies, division of powers and financial management of welfare areas. The Act was published in the national Official Journal

(SDK 611/2021, of 30 June 2021) and entered into force on 1 July 2021.

<https://www.finlex.fi/fi/laki/ajantasa/2021/20210611>

- 4 Act on Organising healthcare and Social Welfare (612/2021) The Act lays down provisions on the content of the responsibility for organising healthcare and social welfare, the steering, evaluation and development of healthcare and social welfare, cooperation between welfare areas and supervision.

The Act was published in the national Official Journal (SDK 612/2021, of 30 June 2021) and entered into force on 1 January 2023.

<https://www.finlex.fi/fi/laki/ajantasa/2021/20210612>

- 5 Act on the financing of welfare areas (617/2021) The Act applies to the granting of central government funding to cover the costs of the duties falling within the responsibility of the welfare areas referred to in the Act on welfare areas.

The Act also applies to the funding of the duties of the welfare areas that are the responsibility of the City of Helsinki.

The Act was published in the national Official Journal (SDK 617/2021, of 30 June 2021) and entered into force on 1 January 2023.

<https://www.finlex.fi/fi/laki/ajantasa/2021/20210617>

- 6 Act on Organising healthcare and Social Welfare in Uusimaa (615/2021) This Act lays down provisions on the responsibility for organising healthcare and social welfare in Uusimaa (including the City of Helsinki) and the organisation of administration and finances related to the organisation of healthcare, social welfare and rescue services in Uusimaa.

The Act was published in the national Official Journal (SDK 615/2021, of 30 June 2021) and entered into force on 1 January 2023.

<https://www.finlex.fi/fi/laki/ajantasa/2021/20210615>

- 7 Government proposal to the Parliament on legislation concerning the establishment of welfare areas and the reform of the organisation of social welfare, health care and rescue services (HE 241/2020) The bill proposes the enactment of the laws that are essential for the establishment and operation of the new administrative level, the welfare areas, namely the Act on welfare areas (Evidence no. 3), the Act on Organising healthcare and social welfare (Evidence no. 4) and the Act on the Organisation of Rescue Services, the Act on Organising healthcare and social

welfare in Uusimaa (Evidence no. 6) and their joint implementing Act, the Act on the Financing of welfare areas (Evidence no. 5), and proposals for amendments to legislation on state contributions to municipalities, tax legislation, legislation on the staff of the welfare areas and certain acts on general administration.

<https://finlex.fi/fi/esitykset/he/2020/20200241>

8 Health care Act (1326/2010)

This Act applies to the provision and content of healthcare that falls within the responsibility of the wellbeing services county, the City of Helsinki and the hospital District of Helsinki and Uusimaa laid down in the Act on Organising healthcare and Social Welfare (612/2021) and the Act on Organising healthcare, social welfare and rescue services in Uusimaa (615/2021), unless otherwise provided in another act. Health care includes promotion of health and wellbeing, primary health care and specialised medical care.

The Act was published in the national Official Journal (SDK 1326/2010, of 31 December 2010) and entered into force on 1 May 2011.

<https://www.finlex.fi/fi/laki/ajantasa/2010/20101326>

9 Pupil and student Welfare Act (1287/2013)

This Act lays down provisions on, among other things, the organisation of pupil and student welfare.

The Act was published in the national Official Journal (SDK 1287/2013, of 31 December 2013) and entered into force on 1 August 2018.

<https://www.finlex.fi/fi/laki/ajantasa/2013/20131287>

It was amended by the Act amending the Pupil and Student Welfare Act (633/2021), published in the national Official Journal and entered into force on 1 January 2023.

[Act amending the Pupil and Student Welfare Act | 633/2021](#)

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the milestone.

Entry into force of the second set of legislative acts completing the establishment of welfare areas and the reform of the social, healthcare and rescue services, [...]

A set of legislative acts (Evidence numbers 2-6) on establishing welfare areas and the reform of the social, healthcare and rescue services, have entered into force:

Welfare Areas and Social, Healthcare and Rescue services

- The Act on the implementation of the reform (Evidence n° 2) entered into force on 1 July 2021, with the exception of Article 2 of the Act, which entered into force on 1 January 2023, as indicated in Article 69 of the Act. The Act lays down provisions on the **establishment of welfare areas**, the transfer of responsibility for organising **healthcare, social welfare and rescue services**, the implementation of the reform and the entry into force of legislation related to the reform.
- The Act on Organising healthcare and Social Welfare (Evidence n° 4) entered into force on 1 January 2023 as indicated in Article 1 of the Act on the implementation of the reform (Evidence n° 2). The Act lays down provisions on the content of the responsibility for organising **healthcare and social welfare**, the steering, evaluation and development of healthcare and social welfare, cooperation between **welfare areas** and supervision.

Welfare Areas

- The Act on welfare areas (Evidence n° 3) entered into force on 1 July 2021 as indicated in Article 1 of the Act on the implementation of the reform (Evidence n° 2). The Act lays down provisions on the administrative procedure, bodies, division of powers and financial management of **welfare areas**.
- The Act on the financing of welfare areas (Evidence n° 5) entered into force on 1 January 2023 as indicated in Article 33 of the Act. Article 15, on the calculation of the coefficient for the promotion of well-being and health of the Act will only apply from 1 January 2026, as per Article 33 of the Act. The Act applies to the granting of central government funding to cover the costs of the duties falling within the responsibility of the **welfare areas**, and to the funding of the duties of the welfare areas that are the responsibility of the City of Helsinki.

Social, Healthcare and Rescue services

- The Act on Organising healthcare and Social Welfare in Uusimaa (Evidence° 6) entered into force on 1 January 2023 as indicated in Article 1 of the Act on the implementation of the reform (Evidence n° 2). The Act lays down provisions on the responsibility for **organising healthcare and social welfare** in Uusimaa (including the City of Helsinki) and the organisation of administration and finances related to the organisation of healthcare, social welfare and rescue services in Uusimaa.

[...] by:

i) Setting up the welfare areas' governance rules, administrative procedures and organisation structures;

Article 95 of the Act on welfare areas (Evidence n° 3) lays down provisions on the administrative regulations of the welfare areas. The administrative regulations contain the necessary regulations at least on matters related to the **organisation of administration and activities**, including bodies (organisational structure) and management, **matters related to decision-making** and **administrative procedures**, and matters related to the activities of the county Council.

Under Article 16 of the Act on the implementation of the reform (Evidence n° 2), the term of office of the first county Council has started on 1.3.2022. According to Article 17 of the Act on the implementation of the reform, after the results of the first county elections have been confirmed, the county Council must without delay organise and select the county executive and other organs of the welfare area and take other measures necessary for **organising the activities and administration** of the welfare area.

- ii) **Transferring the operation of hospital districts, special care districts, services of social workers and psychologists in student welfare to the welfare areas (the welfare areas and the municipalities shall both be responsible for promoting health and wellbeing);**
- iii) **Transfer of healthcare and social welfare personnel and their tasks from municipalities and joint municipal authorities to the employment of the welfare areas;**

The Act on the implementation of the reform (Evidence n° 2) lays down provisions on the **transfer of hospital districts and special care districts** to welfare areas. These actors and their assets, debts and commitments have been transferred to the welfare areas on 1 January 2023 as per Article 2 of this Act.

The **welfare areas will also be responsible for school and student health care at schools and educational institutions** as well as for **student welfare psychologist and school social worker services** as evidenced by Article 9 of the pupil and student welfare act (Evidence n° 9), amended by the Act amending the Pupil and Student Welfare Act (633/2021), which was published in the national Official Journal and entered into force on 1 January 2023.

Article 6 of the Act on Organising Health and Social services (Evidence n° 4), lays down provisions on the **promotion of health and wellbeing in municipalities**. According to the provision, municipalities must promote the health and wellbeing of their residents. Article 7 of this Act lays down provisions on the **promotion of health and wellbeing in the welfare areas**. According to the provision, **welfare areas must promote the health and wellbeing** of their residents.

According to Article 4 of the Act on the implementation of the reform (Evidence n° 2), the responsibility for organising healthcare and social welfare under the Act on Organising healthcare and Social Welfare (Evidence n° 4) will be **transferred from municipalities and joint municipal authorities to the welfare areas** on 1 January 2023. The responsibility for organising healthcare, social welfare and rescue services under the Act on Organising healthcare and Social Welfare in Uusimaa (Evidence n° 6) and the Act on Organising healthcare and Social Welfare (Evidence n° 4) will be transferred to HUS Group, the joint authority for Helsinki and Uusimaa on 1 January 2023. Article 18 of the Act on the implementation of the reform adds that the transfer of social welfare, health care and rescue services tasks and personnel performing the tasks from municipalities and joint municipal authorities to the wellbeing services county and the joint municipal authority for wellbeing services is considered a transfer of business. As a result, **the entire personnel employed by the organisations of healthcare, social welfare and rescue services of municipalities and joint municipal authorities transfers to the welfare areas and joint county authorities for wellbeing services**.

- iv) **Establishing the funding mechanism for the activities of the welfare areas from the central government and from fees collected from the users of services.**

Provisions on the funding of welfare areas are laid down in the Act on the financing of welfare areas (Evidence n° 5). Provisions on the criteria for **central government funding** for welfare areas are laid down in Chapter 3 of the Act on the financing of welfare areas. The welfare areas will be granted central government funding on the basis of the number of inhabitants in the welfare area, factors describing the need for healthcare and social welfare services, population density, foreign-language speakers, bilingualism, insularity, Sámi-language speakers, university hospitals, measures to promote health and wellbeing, and risk factors in rescue services as detailed in Articles 13 – 20a included under Chapter 3.

Under Article 4(2) of the Act on the financing of welfare areas (Evidence n° 5), a welfare area has the right to **charge client fees and user fees for the use of the services** it organises in accordance with separate provision, and to decide on the use of fee income. Under Article 22(2)(8) of the Act on welfare areas (Evidence n° 2), the county Council decides on **the general criteria for charges for services and other services and on client charges for services that fall within the county's responsibility for organising services**.

- v) **Creating an advisory board for healthcare and social welfare under the Ministry of Social Affairs and Health to monitor and assess the fulfilment of health and social services duties and support the national guidance and direction of healthcare and social welfare.**

Article 13 of the Act on Wellbeing Services Counties (Evidence n° 3) details that **the Advisory Board is appointed by the Government** and includes representatives from the wellbeing services counties, the HUS Joint Authority, the City of Helsinki, the Ministry of Finance and other ministries responsible for steering the tasks of the wellbeing services counties.

The **Advisory Board on Healthcare and Social Welfare** aims **to support the Ministry of Social Affairs and Health** in providing interactive guidance to the wellbeing services counties. The Advisory Board serves as a channel for the wellbeing services counties to make proposals to the Ministry of Social Affairs and Health (see [Guidance of the wellbeing services counties - Ministry of Social Affairs and Health](#)).

Article 13 of the Act on Wellbeing Services Counties (Evidence n° 3) further details the tasks of the Advisory Board, including to “anticipate, **monitor and assess** the actual and future development of the operations and finances of the wellbeing services counties” and “to promote the achievement of the **national objectives concerning the duties** of the wellbeing services counties”.

4. Commission Preliminary Assessment: Satisfactory fulfilled.

Number and name of the Milestone: 135 - Operationalisation of regional welfare areas with the capacity to take responsibility for organising social, health and rescue services

Related Measure: FI-C[P4C1]-R[R1]: Preparation of the social welfare and health care reform in support of implementing the care guarantee

Qualitative Indicator: Report of the Ministry of Social Affairs and Health confirming that the regional welfare areas are operational and ready to implement the social welfare and health care reform.

Time: Q2 2023

1. Context:

As part of the preparation of the social and healthcare reform, the objective of this measure is to improve the accessibility of health and social services by promoting the implementation of the care guarantee.

Milestone 135 concerns the establishment and operationalisation of the regional welfare areas responsible for organising healthcare, social welfare and rescue services, in line with the roadmap for the planning and preparation of the implementation of the health and social services reform. The Ministry of Social Affairs and Health shall examine and confirm in a report the implementation of the necessary measures to support the set-up of the welfare areas, covering the following areas: 1) management, 2) administration, 3) finances and 4) services.

Milestone 135 is the third and last milestone of the reform. It follows the completion of milestone 133 on the entry into force of the first set of legislative acts setting out the establishment of welfare areas and the reform of the social, healthcare and rescue services, and it is accompanied by milestone 134 in this payment request, related to the entry into force of the additional legal framework completing the establishment of welfare areas and the reform of the healthcare, social welfare and rescue services.

2. Evidence provided:

Name of the evidence	Short description
1 Summary document	Summary document duly justifying how the milestone was achieved.
2 Final report of the support for the preparation and implementation of the reform of health and social services and rescue services.	Final report focuses on the preparation phases of the reform of healthcare, social welfare and rescue services between 2019 and 2022, during which the preparation and implementation work involved establishing the welfare areas and launching their activities. The report describes the large reform package which included extensive legislative drafting work and voluntary preparations for the implementation nationally and regionally, along with the actual implementation following the approval of the relevant bills. The implementation process aimed to ensure a safe and secure transfer of the responsibility for organising services.

Authors: Ministry of Social Affairs and Health, Ministry of Finance.

- 3 External evaluation regarding the reform of health and social services and rescue services
- The evaluation concerns the administrative legislative and implementation process regarding the reform of social and health services and rescue services, scrutinising the setting of objectives, content and structure, management, reaching of goals and the impact of the operational environment. A document analysis, interviews, a survey, workshops and scientific group of experts' meetings have been carried out during the evaluation. Authors: Owl Group Oy. Date: 1-7-2024.
- Also available online:
[Sosiaali- ja terveydenhuollon ja pelastustoimen uudistuksen ulkoinen arviointi : Loppuraportti](#)

3. Analysis:

The justification and substantiating evidence provided by the Finnish authorities cover all constitutive elements of the milestone.

Regional welfare areas responsible for organising social, healthcare and rescue services shall be established and operational, in line with the roadmap for the planning and preparation of the implementation of the health and social services reform.

Regional welfare areas were established by the entry into force of the Act on the **establishment of welfare areas** and the reform of the **organisation of healthcare, social welfare and rescue services** which was approved by Parliament on 23 July 2021, as positively assessed under milestones 133 and 134.

The **implementation of the healthcare, social welfare and rescue services reform was carried out** by the Government until the end of 2022, when the responsibility for organising services was transferred to the welfare areas and the **welfare areas officially started operating**. (Evidence No. 2, page 10, paragraph five).

A **roadmap** was available online in electronic form during the preparatory phase and was updated continuously to guide the implementation ([Roadmap for regional preparation of the health, social services and regional government reform has been published - Ministry of Finance](#)).

In this context, the evaluation report confirms that the **monitoring of the phases of implementation** was systematic and planned. The situation picture monitored the phases of the reform implementation at different times, such as transition readiness, degree of readiness and progress **according to the roadmap**. The situation picture was also published once a month as a communication measure. In addition, the report confirms that according to key stakeholders the **monitoring** of the situational picture **supported the progress of the reform and contributed to its implementation** (Evidence No. 3, page 42, paragraph two).

The Ministry of Social Affairs and Health shall examine and confirm in a report the implementation of the necessary measures to support the set-up of the welfare areas. This shall cover the following areas: i) management, ii) administration, iii) finances and iv) services.

With regards to the support for the **implementation of the healthcare, social welfare and rescue services reform**, the key objective was to ensure that all the key functions and services of the

emerging welfare areas function without disruption for customers and personnel when the reform entered into force on 1 January 2023 (Evidence No. 2, page 10, paragraph two).

The **Ministry of Social Affairs and Health** formulates in the **Final report of the support for the preparation and implementation of the reform of healthcare, social welfare and rescue services** (Evidence No. 2), the main objectives **guiding the support for implementation** (pages 24-25). In particular, the report explains that:

All **key functions** for the welfare areas were to be operational by 1 January 2023:

- Establishment of the necessary administrative structures so that welfare areas can operate on schedule.
- Building the necessary management systems and ensuring the competence, know-how and sense of security of personnel during the transformation.
- Development of knowledge management by welfare areas and national authorities through the Toivo programme.
- Ensuring the functioning of information systems and digital services with regard to existing and new systems.

All **services** of the welfare areas were to be operational on 1 January 2023:

- Ensuring the maintenance of the service level beyond the transition phase.
- Developing the content of services through digitalisation, for example, in the future Health and Social services Centres programme and other government grant projects.
- Building functional forms of cooperation and service interfaces between welfare areas and municipalities.
- Supporting regions in developing and disseminating scalable solutions

Implementation progressed on schedule:

- Ensuring the sufficiency of resources allocated to implementation proactively at the regional and national levels.
- Consistent targeting of the ministries' support to the regions and uniform communication.
- Involving regional residents and other stakeholders in the implementation of the reform.
- Ensuring close cooperation between welfare areas, ministries and other actors.
- Matters under preparation at the national level are progressing on schedule and create preconditions for regional preparation.

The **external evaluation report** regarding the reform of healthcare, social welfare and rescue services (Evidence No. 3) published on 1 July 2024, further describes that the objective of the support for the implementation of the reform was to create preconditions for the activities of the welfare areas and to ensure the capacity of the emerging welfare areas to assume responsibility for organising services by 2023 (page 60, paragraph one).

The reports further analyse the **implementation of the necessary measures to support the set-up of the welfare areas in the areas of management, administration, finances and services**:

i) The task of the **management** and competence preparation group was to support the development of the management and competence of the welfare areas. The tasks of the preparation group are described on pages 33-34 of the final report (Evidence No. 2):

- examine, describe and develop the needs, structures and tools of management and competence in the future welfare areas
- outline and describe the management processes of the welfare area

- ensure the link between management and competence and the national roadmap for the health and social services reform
- support the implementation and operation of the welfare area being formed
- support the development of the management of the welfare area.

The external evaluation report states that the reform achieved a safe transition of services and the creation of the administrative structures and **management systems** necessary for the transition. (Evidence No. 3, page 66, paragraph three)

ii) The task of the **preparation group** for administration, finances and support services was to act as a regional group that brings together and supports the regional preparation of administration, finances and support services. The tasks of the working group are described on page 31 (paragraph four) of the final report (Evidence No. 2):

- support the transfer of responsibility for organising services to welfare areas.
- ensure that the roadmap for regional preparation is up-to-date.
- maintain situational awareness of regional preparation.
- identify and share regional good practices.
- identify critical stages of preparation and implementation.
- identify areas for cooperation between national and regional actors.

As explained under i), the external evaluation report concludes that the reform achieved a safe transition of services and the creation of the **administrative structures** and management systems necessary for the transition. (Evidence No. 3, page 66, paragraph three)

iii) With regards to finances supporting the set-up of the welfare areas, in accordance with the obligation laid down in Chapter two, Section 15 of the Implementation Act (616/2021, *Act on the implementation of the reform*) - [Laki sosiaali- ja terveydenhuolto- ja pelastustoimea koskevan uudistuksen toimeenpanosta ja sitä koskevan lainsäädännön voimaannpanosta | 616/2021 | Lainsäädäntö | Finlex](#)), the central government granted discretionary government grants to the wellbeing services counties to cover the costs of launching their operations and administration in 2021 and 2022. The general criteria for granting discretionary government transfers and the use and supervision of discretionary government transfers comply with the provisions of the Act on Discretionary Government Transfers (688/2001 - [Valtionavustuslaki | 688/2001 | Lainsäädäntö | Finlex](#)).

The final report confirms that an appropriation was allocated to the state budget for 2021 and 2022, from which discretionary government grants for the preparation of the welfare areas, the joint county authority for the hospital District of Helsinki and Uusimaa and the City of Helsinki, were paid for the costs of launching the activities and administration (Evidence No. 2, page 62, paragraph two and five).

iv) The purpose of the working group preparing the organisation of **services** was to support the reform of services and the controlled transfer of the responsibility for organising healthcare, social welfare and rescue services to welfare areas. The final report explains that task of the preparation group for the organisation of services (Evidence No. 2, page 36, paragraph one) was to:

- support the preparations for organising services in the welfare areas.
- maintain situational awareness of regional preparations for organising services.
- specify and update the share of service provision in the national roadmap for the reform.
- identifying critical issues and measures at different stages of the preparation of the reform.

- ensure, for its part, cooperation between national and regional actors, development projects and other preparatory groups as the reform progresses.

The external evaluation report confirms that the reform achieved a safe **transition of services**. (Evidence No. 3, page 66, paragraph three).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 145 - Launch of a call for applications for clean transition projects

Related Measure: P5C1I1 Investment for Clean Transition

Qualitative Indicator: Publication of the call for applications

Time: Q2 2024

1. Context:

The investment consists of support to large-scale renewable energy projects in the demonstration phase and/or projects along the hydrogen value chain for renewable hydrogen production. The support will take the form of one or more calls under the responsibility of the Ministry of Economic Affairs and Employment and/or Business Finland and will include selection criteria on the increase in share of renewable energy and hydrogen, contribution to commercialisation of relevant technologies and eligibility criteria on DNSH and climate change objectives.

Milestone 145 consists of the launch of a call for applications for projects related to new clean technologies for energy production and use and/or for promoting the development of the production and storage of renewable hydrogen on a commercial scale. The terms of reference shall include eligibility criteria that ensure that the selected projects comply with the 'Do no significant harm' Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation.

Milestone 145 is the first step of the implementation of the investment and is accompanied in this payment request by milestone 146. It will be followed by milestone 147, related to the completion of projects. The investment has a final expected date for implementation of 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled
2	Call for applications	Copy of and link to the publication of the call for applications published on 29 January 2024, https://tem.fi/en/fourth-application-round-for-energy-investment-aid
3	Call instructions	Copy of and link to the call instructions, last updated on 26 January 2024, https://tem.fi/documents/1410877/201067509/RRF-hakuohjeet+(REPowerEU).pdf/05f79924-87de-6ed9-e024-a76e9aefe44a/RRF-hakuohjeet+(REPowerEU).pdf?t=1706698659918
4	Guidelines for the processing of applications	Copy of the guidelines for the processing of applications for RRF energy investments, VN/32567/2021-TEM-4
5	Management and control system	Copy of the Ministry of Economic Affairs and Employment's description of the management and control system, VN/21402/2020-TEM-36

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the milestone.

Launch of a call for applications for projects related to new clean technologies for energy production and use and/or for promoting the development of the production and storage of renewable hydrogen on a commercial scale.

Furthermore, in line with the description of the measure, **the investment shall support large-scale renewable energy projects in the demonstration phase with a priority on technical feasibility, and/or projects along the hydrogen value chain for renewable hydrogen production.**

Furthermore, in line with the description of the measure, **the support shall take the form of one or more calls under the responsibility of the Ministry of Economic Affairs and Employment and/or Business Finland.**

Finland has provided a copy of the call for applications (item 2 on the evidence list), published on the website of the Ministry of Economic Affairs and Employment. The section titled “How to apply” of this document confirms that the call was open for applications from 29 January 2024 until 29 February 2024. The first section determines that the call includes “introduction of new clean technologies for energy production and use, and/or by promoting the development of the production and storage of renewable hydrogen on a commercial scale”. The section titled “Projects eligible for aid” of this document clarifies that “the aid can be granted for large-scale renewable energy projects in the demonstration phase with a priority in technical feasibility, and/or projects along the hydrogen value chain for renewable hydrogen production”. Section 8 of the call instructions (item 3 of the evidence list) determines that the granting of aid is decided by the Ministry of Economic Affairs and Employment.

The terms of reference shall include eligibility criteria that ensure that the selected projects comply with the ‘Do no significant harm’ Technical Guidance (2021/C58/01) through the use of an exclusion list and the requirement of compliance with the relevant EU and national environmental legislation.

Furthermore, in line with the description of the measure, **In order to ensure that the measure complies with the ‘Do no significant harm’ Technical Guidance (2021/C58/01), the eligibility criteria contained in terms of reference for upcoming calls for projects shall exclude the following list of activities: (i) activities related to fossil fuels, including downstream use²; (ii) activities under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks³; (iii) activities related to waste landfills, incinerators⁴ and**

² Except (a) projects under this measure in power and/or heat generation, as well as related transmission and distribution infrastructure, using natural gas, that are compliant with the conditions set out in Annex III of the ‘Do no significant harm’ Technical Guidance (2021/C58/01) and (b) activities and assets under point (ii) for which the use of fossil fuels is temporary and technically unavoidable for the timely transition towards a fossil fuel free operation.

³ Where the activity supported achieves projected greenhouse gas emissions that are not significantly lower than the relevant benchmarks an explanation of the reasons why this is not possible should be provided. Benchmarks established for free allocation for activities falling within the scope of the Emissions Trading System, as set out in the Commission Implementing Regulation (EU) 2021/447.

⁴ This exclusion does not apply to actions under this measure in plants exclusively dedicated to treating non-recyclable hazardous waste, and to existing plants, where the actions under this measure are for the purpose of increasing energy efficiency, capturing exhaust gases for storage or use or recovering materials from

mechanical biological treatment plants⁵; and (iv) activities where the long-term disposal of waste may cause harm to the environment. The terms of reference shall additionally require that only activities that comply with relevant EU and national environmental legislation may be selected.

Finland has provided a copy of the terms of reference of the call (call instructions; item 3 on the evidence list). Section 4.2 of this document includes the requirement that projects need to comply with the DNSH Technical Guidance through the use of an exclusion list. The exclusion list in this document contains the same elements as the Council Implementing Decision, namely (i) activities related to fossil fuels, including downstream use; (ii) activities under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks; (iii) activities related to waste landfills, incinerators and mechanical biological treatment plants; and (iv) activities where the long-term disposal of waste may cause harm to the environment. The footnotes included in the Council Implementing Decision are also included in the call instructions.

The same section also includes the requirement for projects to comply with the relevant EU and national environmental legislation.

Furthermore, in line with the description of the measure, **the project selection criteria shall include the contribution to the increase in the share of renewable energy and hydrogen and the potential contribution to the long-term development and commercialisation of relevant technologies.**

Finland has provided a copy of the call for applications (item 2 on the evidence list). The section “Aid may be granted for” included in this document specifies that the assessment of applications will “take into account the contribution of the projects to increasing the use of renewable energy and hydrogen and to the long-term development and commercialisation of technologies”.

Furthermore, in line with the description of the measure, **Eligibility criteria shall ensure that all projects contribute to the climate change objectives linked to at least one of the intervention fields 024ter⁶, 028, 029, 030bis⁷, 032, 033 and 034bis⁸ that have a 100% climate coefficient in**

incineration ashes, provided such actions under this measure do not result in an increase of the plants’ waste processing capacity or in an extension of the lifetime of the plants; for which evidence is provided at plant level.

⁵ This exclusion does not apply to actions under this measure in existing mechanical biological treatment plants, where the actions under this measure are for the purpose of increasing energy efficiency or retrofitting to recycling operations of separated waste to compost bio-waste and anaerobic digestion of bio-waste, provided such actions under this measure do not result in an increase of the plants’ waste processing capacity or in an extension of the lifetime of the plants; for which evidence is provided at plant level.

⁶ (a) If the objective of the measure is to achieve, on average, at least a medium-depth level renovation as defined in Commission Recommendation on Building Renovation (EU) 2019/786 or (b) if the objective of the measures is to achieve, on average, at least a 30 % reduction of direct and indirect GHG emissions compared to the ex-ante emissions.

⁷ If the objective of the measure relates to the production of electricity or heat from biomass in line with Directive (EU) 2018/2001; and if the objective of the measure is to achieve at least 80 % GHG emission savings at the facility from the use of biomass in relation to the GHG saving methodology and the relative fossil fuel comparator set out in Annex VI to Directive (EU) 2018/2001. If the objective of the measure relates to the production of biofuel from biomass (excluding food and feed crops), in line with Directive (EU) 2018/2001; and if the objective of the measure is to achieve at least 65 % GHG emission savings at the facility from the use of biomass for this purpose in relation to the GHG saving methodology and the relative fossil fuel comparator set out in Annex V to Directive (EU) 2018/2001.

⁸ In case of high-efficiency cogeneration, if the objective of the measure is to achieve life cycle emissions that are lower than 100gCO₂e/kWh or heat/cool produced from waste heat. In case of district heating/cooling, if the associated infrastructure follows the Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing

accordance with Annex VI to Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility⁹.

The Council Implementing Decision required the establishment of eligibility criteria linked to at least one of the intervention fields that have a 100% climate coefficient. The call instructions provided by Finland do not include the intervention fields in the eligibility criteria. Instead, the guidelines for the processing of applications (item 4 of the evidence list), as required by page 8 of the description of the management and control system of the Ministry of Economic Affairs and Employment for measure P5C1I1 (item 5 of the evidence list), determine in its section 6 “Eligibility: intervention fields and related specific conditions” that each of the projects falls under one of the intervention fields defined in Annex 6 of the RRF Regulation, and that investments in energy are tied to the support sectors of the following intervention fields: 024ter, 028, 029, 030bis, 032, 033 and 034bis0. Section 6.1 “Specific conditions for the deployment of new energy technologies” includes the transcription of the relevant footnotes of the intervention fields 024ter, 030bis and 034bis0. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the inclusion of the eligibility criteria in the guidelines for processing applications sufficiently indicates that the required eligibility criteria have been applied by the implementing body. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Directives 2004/8/EC and 2006/32/EC (OJ L 315, 14.11.2012, p.1) or the existing infrastructure is refurbished to meet the definition of the efficient district heating and cooling, or the project is an advanced pilot system (control and energy management systems, Internet of Things) or leads to a lower temperature regime in the district heating and cooling system.

⁹ OJ L 57, 18.2.2021, p. 17–75.

Number and name of the Milestone: 146 - Award of all grants for clean transition projects

Related Measure: P5C1I1 Investment for Clean Transition

Qualitative Indicator: Notification of the award of all grants

Time: Q2 2025

1. Context:

The investment consists of support to large-scale renewable energy projects in the demonstration phase and/or projects along the hydrogen value chain for renewable hydrogen production. The support will take the form of one or more calls under the responsibility of the Ministry of Economic Affairs and Employment and/or Business Finland and will include selection criteria on the increase in share of renewable energy and hydrogen, contribution to commercialisation of relevant technologies and eligibility criteria on DNSH and climate change objectives.

Milestone 146 consists of the selection of all projects under the call for applications, related to new clean technologies for energy production and use and/or for promoting the development of the production and storage of renewable hydrogen on a commercial scale.

Milestone 146 is the second milestone of the investment and is accompanied in this payment request by milestone 145. It will be followed by milestone 147, related to the completion of projects. The investment has a final expected date for implementation of 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled
2-10	Grant Award decisions (9)	Copy of the nine grant award decisions
11	List of projects	List of projects with grants awarded
12-19	Screen shots of the grant award notifications	Screen shots

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the milestone.

The selection of all projects related to new clean technologies for energy production and use and/or for promoting the development of the production and storage of renewable hydrogen on a commercial scale shall be carried out in accordance with the criteria of the call for applications launched under milestone 145. All funding award decisions shall be awarded to the project applicants selected under the call for applications.

Finland provided a list of the nine projects selected (item 11 of the evidence list) as well as the nine grant award decisions (items 2 to 10 of the evidence list) related to the measure, whose selection criteria have been positively assessed in milestone 145. All signed grant award decisions refer to the

call launched under measure P5C1I1, as evidenced in the nine grant award decisions under sections “Conditions for support – 1. Investment project”, which reference that the investment projects concern clean transition investments. All grant award decisions contain confirmation that the projects comply with the selection and eligibility criteria of the call for proposals launched under milestone 145, as well as a project-level DNSH assessment carried out by Business Finland under sections 9 “Compliance with the DNSH principle” and 10 “Specific conditions related to the sector”.

Notification of the award of all grants

As the notifications to final recipients are done automatically in the EVAL system upon granting of the award decisions, Finland provided screen shots of the log pages with the notification process on the EVAL system for each award (items 12-19 of the evidence list).

The Commission services conducted an on-site on-the-spot check on 12 September 2025 to verify the notification of the award of all grants. This check was completed successfully, confirming that all grant awards were notified to the project applicants.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 150 – Selection of doctoral students in the LUKE Doctoral School programme

Related Measure: P5C1I2: R&D for the green transition

Quantitative Indicator: Number

Baseline: 0

Target: 4

Time: Q3 2024

1. Context:

The objective of the investment is to support research and development activities that focus on promoting renewable energy solutions in Finland. The investment finances three strategic research and development projects. The first project focuses on areas with significant potential of carbon emissions reductions. The second project aims to support the transition to clean energy and the efficient use of natural resources. The third project focuses on the scope for and impact of further investments in renewable energy and integrates REPowerEU objectives into the LUKE Doctoral School programme.

Target 150 concerns the third of these three projects. It requires the allocation of at least four doctoral student posts in the Natural Resources Institute Finland (LUKE) Doctoral School programme to REPowerEU-related themes, including i) wind and solar power, ii) data-driven optimization of the use of energy sources and iii) resource efficiency, with a view to fostering REPowerEU-competence building.

Target 150 is chronologically the first out of four milestones and targets associated with this investment measure. It will be followed by target 149, which covers the first of the three research projects mentioned above. In the final instalment, the investment will be completed by milestone 148, which requires the establishment of a new facility for experimental research, and milestone 151, which includes the publication of two roadmaps to conclude the second and third of the research projects described above. The investment has a final expected date for implementation of 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.	
2-5	Assignment letters into the LUKE Doctoral school programme of the four selected PhD students	The assignment letters signed by LUKE addressed to four doctoral students, confirming their acceptance into the Luke Doctoral Programme for REPowerEU-related themes
6	Signature summary	<i>DocuSign</i> certificate of electronic signatures
7-10	Work contracts for the four selected PhD	These annexes contain the work

	students	contracts of the four selected doctoral students
11	Research plan of student L.S.	These annexes contain the research plans of the four selected doctoral students
12	Research plan of student N.E.	
13	Research plan of student P.R.	
14	Research plan of student S.L.	

3. Analysis:

The justification and substantiating evidence provided by the Finland authorities cover all constitutive elements of the target.

At least four doctoral student posts in the Natural Resources Institute Finland (LUKE) Doctoral School programme shall be allocated to REPowerEU-related themes, including i) wind and solar power, ii) data-driven optimization of the use of energy sources and iii) resource efficiency, with a view to fostering REPowerEU-competence building.

Furthermore, in line with the description of the measure, **the project shall integrate REPowerEU objectives including i) wind and solar power, ii) data-driven optimization of the use of energy sources and iii) resource efficiency into the LUKE Doctoral School programme to foster competence-building.**

Items 2-5 of the evidence list are the assignment letters for four doctoral students hired by the Natural Resources Institute of Finland (LUKE) which show that four doctoral posts were allocated to REPowerEU-related themes. The research plans of the selected doctoral students (items 11-14 of the evidence list) show that they work on the REPowerEU-related themes as referred to in the description of the milestone. Reference to wind and solar power is included in the 'aims and objectives' and 'research objectives' sections of the research plan of student S.L. (item 14 of the evidence list). Reference to data-driven optimization of the use of energy sources is included in the 'Implementation: methodology and methods' section of the research plan of student L.S. (item 11 of the evidence list). Reference to resource efficiency is included in the 'Research aim: research questions or objectives' section of the research plan of student L.S. (item 11 of the evidence list). The other two students (N.E. and P.R.) were also selected to perform REPowerEU-relevant PhD studies. The research plan of student N.E. (item 12 of the evidence list) confirms on page 10 that the study is part of the Natural Resources Institute of Finland's REPowerEU project, focusing on renewable energy sources, mainly solar and wind energy, the potential and impacts of additional investments, quantifying costs, and benefits, assessing support from landowners and citizens, and evaluating the mitigation hierarchy to align energy production with environmental objectives and biodiversity. The research plan of student P.R. (item 13 of the evidence list) confirms on page 8 that the dissertation will be fully funded by Natural Resources Institute Finland (LUKE) as part of the REPowerEU project.

Furthermore, in line with the description of the measure, **the third project shall focus on the scope for and impact of further investments in renewable energy, in particular solar and wind energy, to investigate costs and benefits, to assess the support among landowners and the public, and to evaluate the mitigation hierarchy to balance energy production with environmental and biodiversity targets.**

Item 11 of the evidence list is the research plan of student L.S., which in its section 'research aim' refers to the costs and benefits of the energy transition and of further investments in renewable energy. Item 12 of the evidence list is the research plan of student N.E., which in its introductory section confirms that her study will focus on the role of spatial change agency in the future scenarios of the energy transition driven by wind and solar power growth in Finland by 2055. Item 13 of the

evidence list is the research plan of student P.R., which in its section 'research objectives' refers to an assessment of the support among landowners and the public for further investments in renewable energy. Item 14 of the evidence list is the research plan of student S.L., which lists in the section 'aims and objectives' three studies to evaluate the balance between energy production and environmental and biodiversity targets.

The results of this research will feed into LUKE's generation of a roadmap on emerging renewable energy systems, which will be assessed as part of milestone 151.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.