7 April 2026

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the fourth payment request submitted by Finland on 18 December 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 18 December 2025, Finland submitted a request for payment for the fourth 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 20 milestones and targets of the fourth 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 Finland [1].

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.

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 legal acts related to the strategic promotion of the circular economy and reform of the Waste Act. The milestones and targets also confirm progress towards the completion of investment projects related to decarbonisation, improving career guidance services, increased career support by the employment services, support for growth and innovation in the cultural and creative sectors, shortened time for processing work and education-based residence permit applications and better coordinated and integrated social and health services.

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, ST 16877/25; ST 16877/25 ADD 1

Contents

Number and name of the Target: 1 – Reduction of the use of coal for energy by 2026 compared to 2019 3

Number and name of the Milestone: 4 – Publication of additional calls for applications for energy infrastructure projects 5

Number and name of the Milestone: 13 – Entry into force of legal act(s) 8

Number and name of the Milestone: 15 – Stakeholders accepted to the Circular Economy Green Deal 11

Number and name of the Milestone: 17 – Implementing Agreement 14

Number and name of the Target: 24 – Project reports submitted 19

Number and name of the Milestone: 32 – Publication of additional calls for applications regarding support for a low-carbon built environment 21

Number and name of the Milestone: 59 – Test track equipped with radio-based ERTMS 27

Number and name of the Milestone: 62 - Report on the exchange of digital business information . 30

Number and name of the Milestone: 75 – A digital platform for cybersecurity training 33

Number and name of the Target: 78 - Number of job search interviews conducted by public employment services 34

Number and name of the Target: 84 – Decrease in the average number of days for processing residence permit applications based on work and education 37

Number and name of the Milestone: 89 - Work ability teams for the provision of Work Ability Programme offered in new municipalities and the Individual Placement and Support model service offered in new welfare areas 45

Number and name of the Target: 90 - Number of workplaces or occupational health care units having participated in work ability promotion measures 50

Number and name of the Target: 95 – Number of participants in further training in career guidance 53

Number and name of the Milestone: 128 – Publication of additional calls for applications 56

Number and name of the Target: 129 - Project reports submitted 62

Number and name of the Target: 131 - Final reports submitted 65

Number and name of the Milestone: 132 - Measures to advance sustainable growth in the tourism sector 67

Number and name of the Milestone: 137 – Regional multi-sector service management models provided in all welfare areas 72

Number and name of the Target: 1 – Reduction of the use of coal for energy by 2026 compared to 2019

Related Measure: P1C1R1 – Transformation of the energy system – Reduction in the use of coal for energy by 2026

Quantitative Indicator: Petajoules

Baseline: 60

Target: 36

Time: Q2 2026

1. Context:

The aim of this reform is to support the ban of the energy use of coal by 2029. This reform consists of a reduction of the use of coal in energy generation.

Target 1 requires a reduction in the consumption of coal from 60 Petajoules in 2019 to 36 Petajoules or less by 2026.

Target 1 is the only milestone or target of this reform.

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	Data extracted from Statistics Finland database	Copy of data included in Statistics Finland's database regarding the consumption of hard coal in Finland in 2019 and 2023, as well as link to the database on the website of Statistics Finland: https://pxdata.stat.fi/PxWeb/pxweb/en/StatFin/StatFin__kivih/statfin_kivih_pxt_11l7.px/
3	Letter from StatFin of 26 January 2026 on the procedures applied for the compilation of energy statistics data	Letter from Statistics Finland confirming the procedures and quality assurance of the figures quoted in the summary document and the evidence provided for T1, as well as link to the database for energy consumption of coal by year: https://pxdata.stat.fi/PxWeb/pxweb/en/StatFin/StatFin__ehk/statfin_ehk_pxt_12vq.px/table/tableViewLayout1/

3. Analysis:

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

Consumption of coal for energy shall be reduced to 36 Petajoules or less by 2026 compared to 60 Petajoules in 2019.

According to the data compiled by the national statistics agency of Finland, Statistics Finland (item 2 on the evidence list), listed as item 11I7 in the statistical agency's database, the consumption of hard coal for energy was 60.652 Petajoules in 2019. In 2023, the consumption of hard coal was 30.214 Petajoules. The Commission accessed the link to the database provided by the Finnish authorities on 9 January 2026 to verify the data for 2019 and 2023. This check was completed successfully, confirming that the target was effectively achieved in 2023. Finland has hereby achieved the target in 2023 instead of in 2026, three years ahead of the deadline indicated in the target.
An update of the database to include data for 2024 shows that the consumption of coal for energy further decreased to 20.078 Petajoules in 2024, showing that the decrease in coal use is sustained beyond the year in which the target was achieved. A link to the updated database is included in the letter from Statistics Finland describing the procedures and quality assurance for the compilation of energy statistics data (item 3 on the evidence list). The Commission accessed the link to the database provided by the Finnish authorities on 4 February 2026 to verify the data for 2024. This check was completed successfully, confirming that the achievement of the target was not only sustained in 2024, but that the consumption of coal for energy decreased further since the target was first achieved in 2023.
Finland has submitted a letter from Statistics Finland (item 3 on the evidence list), which confirms the process and checks used to complete the database. As described in the letter, the energy statistics, including the consumption of coal for energy, are compiled by Statistics Finland in accordance with Regulation (EC) No 1099/2008 on energy statistics. In terms of quality assurance, the letter describes the process followed to ensure correctness and consistency of the data. Moreover, the letter confirms that the data for 2019 (the baseline) and 2023 (the achievement of the numerical target) were derived following the same procedure, ensuring the comparability of the data series over time.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 4 – Publication of additional calls for applications for energy infrastructure projects

Related Measure: P1C1I1 - Transformation of the energy system – Energy infrastructure investments

Qualitative Indicator: Publication of additional calls for applications on the website of the Ministry of Economic Affairs

Time: Q4 2024

1. Context:

The objective of this investment is to enhance the framework conditions for attracting investment in clean energy, with a focus on energy system integration, energy storage and transport. The investment supports projects that promote the construction of energy infrastructure.

Milestone 4 concerns the launch of the calls for applications for the energy infrastructure investments in line with the eligibility and selection criteria in milestone 3 (including the "Do No Significant Harm" criteria).

Milestone 4 is the second milestone of the investment. It follows the completion of milestone 3, related to the launch of the first competitive call for proposals for energy infrastructure investments. It will be followed by target 5, which requires the completion of at least four supported projects corresponding to an increase in new renewable energy capacity and/or grid connection capacity of at least 137 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 duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.	
2	Copy of the second call for applications, published on 15 March 2023	Copy of and link (https://tem.fi/en/second-application-round-for-energy-investment-aid) to the publication of the second call for applications for energy investment aid on the website of the Ministry of Economic Affairs and Employment
3	Copy of the application instructions for the second call for applications	Copy of the call instructions for the second call for applications including the eligibility criteria of the call. The call instructions contain general guidance for the applicants regarding applicable legislation and its requirements, technical specifications as well as guidance on the application procedure.
4	Copy of the third call for applications, published on 15 May 2024	Copy of and link (https://tem.fi/en/fifth-application-round-for-energy-investment-aid) to the publication of the third call for applications for energy investment aid on the website of the Ministry of Economic Affairs and Employment

5	Copy of the application instructions for the third call for applications	Copy of the call instructions for the third call for applications including the eligibility criteria of the call. The call instructions contain general guidance for the applicants regarding applicable legislation and its requirements, technical specifications as well as guidance on the application procedure.

3. Analysis:

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

Publication of additional calls for applications in line with the eligibility/selection criteria in milestone 3.

In addition to the first call for applications for energy infrastructure investments assessed in milestone 3, Finland has published two additional calls for applications for energy infrastructure investments. The description of the milestone refers to the eligibility/selection criteria included in milestone 3, which covers "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 second call for applications for energy infrastructure investments was published on the website of the Ministry of Economic Affairs and Employment on 15 March 2023 (item 2 on the evidence list). The eligibility criteria for this call are included in the terms of refence (titled 'application instructions' in the evidence document) of the second call for applications (item 3 on the evidence list). Section 4 of the application instructions specifies the eligibility criteria for applicants. Section 4.2 specifies the requirement of compliance with the 'Do No Significant Harm' principle as a condition for the eligibility of all projects applying for funding under this call for applications. Section 4.2, in particular, requires compliance with the 'Do No Significant Harm (DNSH)' Technical Guidance, it includes a reference to the exclusion list and it specifies that projects are required to comply with EU and national environmental legislation. The exclusion list is specified in detail in the same section 4.2 and includes activities related to fossil fuels, including downstream use, activities under the European Union Emissions Trading System (EU ETS) whose projected greenhouse gas emissions are not below the relevant benchmarks, activities related to landfills, incinerators and mechanical biological treatment plants, and activities where the long-term disposal of waste may cause harm to the environment.

The third call for applications for energy infrastructure investments was published on the website of the Ministry of Economic Affairs and Employment on 15 May 2024 (item 4 on the evidence list). The eligibility criteria for this call are included in the terms of reference (titled 'application instructions' in the evidence document) of the third call for applications (item 5 on the evidence list). Section 4 of the application instructions specifies the eligibility criteria for applicants. Section 4.2 specifies the requirement of compliance with the 'Do No Significant Harm' principle as a condition for the eligibility of all projects applying for funding under this call for applications. Section 4.2, in particular, requires compliance with the 'Do No Significant Harm (DNSH)' Technical Guidance, it includes a reference to the exclusion list and it specifies that projects are required to comply with EU and national environmental legislation. The exclusion list is specified in detail in the same section 4.2 and includes activities related to fossil fuels, including downstream use, activities under the European Union Emissions Trading System (EU ETS) whose projected greenhouse gas emissions are not below the relevant benchmarks, activities related to landfills, incinerators and mechanical biological

treatment plants, and activities where the long-term disposal of waste may cause harm to the environment.

Furthermore, in line with the description of the measure, **this investment consists of providing grants for projects with a focus on energy infrastructure, which may include, but is not limited to, electricity grids and electricity transmission capacity, integration of energy systems to produce, transmit and utilise surplus and waste heat and transport of low carbon gases including hydrogen.** The eligible technologies that can be funded as part of this measure are listed in section 3.1 of the application instructions of the calls for applications launched under this measure (item 3 and item 5 on the evidence list). This section states that energy infrastructure projects are eligible for funding under measure P1C1I1, including electricity grids and electricity transmission, the utilisation and transfer of surplus and waste heat, and transport of low carbon gases, including hydrogen.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 13 – Entry into force of legal act(s)
Related Measure: P1C2R2 – Industrial reforms and investments supporting the green and digital transition – Strategic promotion of the circular economy and reform of the Waste Act

Qualitative Indicator: Provision in the law indicating the entry into force of the legal act(s)

Time: Q4 2024

1. Context:

The aim of this measure is to promote the circular economy in Finland. Reform measure P1C2R2 consists of two elements. Firstly, it requires the implementation of the reformed Waste Act (646/2011) with separate collection obligations for packaging and biowaste from households and businesses, packaging producers' responsibility for the costs of packaging waste management, implementation of the Single-Use Plastics Directive and the obligation to separate collection of textile waste at regional reception points. Secondly, the reform requires the adoption of a Strategic Programme for 2035, which sets targets for the consumption of non-renewable natural resources, resource productivity and circular material use rate.

Milestone 13 applies to the first element mentioned above. It requires the new legal acts to be adopted to include a number of specific objectives related to separate collection of waste, producer responsibility and recycling targets.

Milestone 13 is chronologically the second milestone of the reform, and it follows the completion of milestone 14, related to the adoption of the Strategic Programme. It will be followed by milestone 15, related to the stakeholders being accepted to the Circular Economy Green Deal.

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	Copy of the publication of the Waste Act (646/2011) in the Statute Book of Finland with date of publication on 21 June 2011 and entry into force on 1 May 2012	Copy of the Waste Act which aims to promote a circular economy and to improve the sustainability of the use of natural resources. This Act applies to waste, waste management and littering as well as to products and activities generating waste.
3	Copy of the publication of the Act Amending the Waste Act (714/2021) of 15 July 2021 in the Statute Book of Finland with date of publication on 16 July 2021 and entry into force on 19 July 2021	Copy of the Act Amending the Waste Act (714/2021). This Act amends the original Waste Act (646/2011).
4	Copy of the publication of the Government Decree on Waste (978/2021) in the Statute Book of Finland with date of publication on 23	The Government Decree on Waste (978/2021) regulates waste management. As a complementary legal act to the Waste Act (646/2011 as amended by Amending Act

	November 2021 and entry into force on 1 December 2021	714/2021), the Decree specifies requirements promoting a circular economy, enhancing the efficient use of materials, and reducing environmental harm.
5	Copy of the publication of the Government Decree on Packaging and Packaging Waste (1029/2021) in the Statute Book of Finland with date of publication on 29 November 2021 and entry into force on 1 December 2021, as amended by the Government Decree amending the Government Decree on Packaging and Packaging Waste (1321/2022) with date of publication on 29 December 2022 and entry into force on 1 January 2023	The Government Decree on Packaging and Packaging Waste (1029/2021) is a complementary legal act to the Waste Act (646/2011 as amended by Amending Act 714/2021), which includes provisions on the separate collection, reuse, recycling, and other waste management of used packaging and single-use plastic beverage cups, as well as the requirements concerning the characteristics and labelling of packaging placed on the market in Finland.

3. Analysis:

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

Entry into force of legal act(s) including: 1) separate collection of biowaste in urban areas, …
Section 17 of the Government Decree on Waste (item 4 on the evidence list) includes the obligation for municipalities to organise the separate collection of biowaste generated in households. Section 54 of this Decree confirms that it entered into force on 1 December 2021.

Entry into force of legal act(s) including: … 2) producers to compensate municipalities for 80% of the cost of the separate collection and transport of packaging waste, …
Section 49b of the Act Amending the Waste Act (item 3 on the evidence list) includes the obligation for packaging waste producers to cover at least 80 percent of the total costs of packaging waste management. Section 49b also specifies that these costs include the separate collection of packaging waste as well as the transport of packaging waste. The final provisions of the Act confirm that it entered into force on 19 July 2021.

Entry into force of legal act(s) including: … 3) separate collection of packaging waste and textiles, …
Section 18 of the Government Decree on Waste (item 4 on the evidence list) requires municipalities, in cooperation with the packaging producer organisation, to arrange for the separate collection of glass, metal, plastic, and paper and cardboard packaging waste generated in residential areas. Section 21 of the Government Decree on Waste (item 4 on the evidence list) requires waste producers to arrange the separate collection of packaging waste outside residential areas. These two elements together cover the requirement in the milestone description for the separate collection of packaging waste.
The separate collection of textiles is ensured by Section 20 of the Government Decree on Waste (item 4 on the evidence list), which requires municipalities to arrange regional collection points for textile waste. Section 54 of this Decree confirms that it entered into force on 1 December 2021.

Entry into force of legal act(s) including: … 4) national separate collection of biowaste from new properties, …

Section 21 of the Government Decree on Waste (item 4 on the evidence list) includes the obligation for waste holders to arrange the separate collection of biowaste from every property located in an urban area. This includes new properties. The requirement is considered national in the sense that the provisions of the Decree apply to the territory of the Republic of Finland. Section 54 of this Decree confirms that it entered into force on 1 December 2021.

Entry into force of legal act(s) including: … 5) general recycling targets for municipal waste, which shall be increased to 55% in 2025 and 60% in 2030, …
Section 23 of the Government Decree on Waste (item 4 on the evidence list) sets general recycling targets for municipal waste. This section requires that at least 55% by weight of municipal waste shall be prepared for reuse and recycled nationally per calendar year at the latest by 1 January 2025 and at least 60% by 1 January 2030. Section 54 of this Decree confirms that it entered into force on 1 December 2021.

Entry into force of legal act(s) including: … 6) legally binding recycling targets for packaging waste producers, which shall increase the target for the recycling rate of plastic packaging to 55% by 2030.
Section 8 of the Government Decree on Packaging and Packaging Waste (item 5 on the evidence list) sets legally binding recycling targets for packaging waste producers. The section sets a target for the recycling rate of plastic packaging of 50% for 1 January 2025, which shall be increased to 55% by 1 January 2030. Section 25 of this Decree confirms that it entered into force on 1 December 2021.

Furthermore, in line with the description of the measure, **this measure consists of (...) reform of existing waste legislation**.
Item 2 on the evidence list is a copy of the existing Waste Act which entered into force on 1 May 2012 and which applies to waste, waste management and littering as well as to products and activities generating waste. Item 3 on the evidence list is a copy of the publication of the Act Amending the Waste Act which entered into force on 19 July 2021. This Amending Act is the legal act reforming the existing waste legislation.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 15 – Stakeholders accepted to the Circular Economy Green Deal

Related Measure: P1C2R2 – Industrial reforms and investments supporting the green and digital transition – Strategic promotion of the circular economy and reform of the Waste Act

Qualitative Indicator: Stakeholders accepted to the Circular Economy Green Deal

Time: Q2 2025

1. Context:

The aim of this reform is to promote the circular economy in Finland. This measure consists of a Strategic Programme for a Circular economy, reform of existing waste legislation and accepting stakeholders to the Circular Economy Green Deal.

Milestone 15 relates to the acceptance of stakeholders to the Circular Economy Green Deal. It requires the publication of the Circular Economy Green Deal as well as the positive assessment of stakeholders' applications to join the Circular Economy Green Deal.

Milestone 15 is the third and last milestone of the reform, and it follows the completion of, chronologically, milestone 14 related to the adoption of the Strategic Programme for a Circular economy, and milestone 13 related to the reform of existing waste legislation.

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	Copy of web page of the Ministry of the Environment for the 'Circular Economy Green Deal'	Copy of the online publication of official information by the Ministry of the Environment regarding the Circular Economy Green Deal, including the rules governing the commitments, their assessment, timelines, completed commitments and background information. Also available online at: http://www.ym.fi/kiertotalouden-green-deal
3	Copy of the publication 'Circular Economy Green Deal: Rules and Transformation Themes', published on 11 June 2024 on the website of the Ministry of the Environment	Copy of the publication 'Circular Economy Green Deal: Rules and Transformation Themes', and the link to the publication on the Ministry of the Environment's website (in Finnish): https://ym.fi/documents/1410903/42733297/ Kiertotalouden+green+dealin+pelis%C3%A4%C3%A4nn%C3%B6t.pdf/ 3274dbde-a324-461d-64f7-449fff25aba2/ Kiertotalouden+green+dealin+pelis%C3%A4%C3%A4nn%C3%B6t.pdf? t=1727783956205
4	Copy of the assessments of stakeholders applications by the Evaluation Group of the Ministry of the Environment	Copy of the approval reports of 27 applications by stakeholders to join the Circular Economy Green Deal, including the proposed commitments, a technical evaluation by the secretary, the assessment by the evaluation group and the official approval to the Circular Economy Green Deal by the Ministry of the Environment.

3. Analysis:

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

The Circular Economy Green Deal shall be published on the website of the Ministry of the Environment.
The Circular Economy Green Deal promotes the circular economy in Finland by introducing concrete targets for the consumption of non-renewable natural resources, resource productivity and circular material use rate. The Circular Economy Green Deal was published on the website of the Ministry of the Environment on 11 June 2024 (item 2 on the evidence list). The Commission services accessed the link provided by the authorities on 9 January 2026 to verify the publication of the Circular Economy Green Deal on the website of the Ministry of the Environment. This check was completed successfully, confirming that the Circular Economy Green Deal was effectively published on the website of the Ministry of the Environment. Specifically, the website contains a link to a document titled "Circular Economy Green Deal: Rules and Transformation Themes (11 June 2024)", which sets out the rules for stakeholders to join the Circular Economy Green Deal (also submitted as item 3 on the evidence list).

At least 22 positive assessments by the Evaluation Group of the Ministry of the Environment of stakeholder applications to join the Circular Economy Green Deal shall be submitted.
Furthermore, in line with the description of the measure, **this measure consists of [...] accepting stakeholders to the Circular Economy Green Deal.**
Section 1.2 of the rules of the Circular Economy Green Deal (item 3 on the evidence list) explains the process for stakeholders to join the Circular Economy Green Deal by means of the conclusion of voluntary commitments. Section 1.2.4 explains that the voluntary commitments will be assessed by an evaluation group composed of representatives of the technical services.

Finland has provided a copy of 27 positive assessments of stakeholder applications signed by the head of the Evaluation Group of the Ministry of the Environment (item 4 on the evidence list), which confirm that 27 stakeholders have been accepted to join the Circular Economy Green Deal. The Evaluation Group is composed of researchers from the Finnish Environment Institute, the Technical Research Centre of Finland and the Natural Resources Institute Finland. According to the evidence provided, Finland provided 27 positive assessments by the Evaluation Group of the Ministry of the Environment of stakeholder applications to join the Circular Economy Green Deal, thus exceeding the goal of Milestone 15 by 5 positive assessments.

Each evaluation contains a presentation of the proposed commitments by the stakeholder, a technical evaluation of the commitments by the secretary of the evaluation group, the formal assessment by the evaluation group and the official approval to join the Circular Economy Green Deal by the Ministry of the Environment. A positive assessment by the Evaluation group directly results in the acceptance to the Circular Economy Green Deal of a stakeholder or stakeholder group.

The positive conclusions for the 27 stakeholder applications to the Circular Economy Green Deal can be found on pages 8, 15, 21, 27, 34, 40, 47, 55, 66, 73, 80, 87, 95, 104, 110, 118, 126, 135, 141, 148, 156, 163, 177, 184, 193, 201 and 208 of the assessment document.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 17 – Implementing Agreement

Related Measure: P1C2I1 – Low-carbon hydrogen and carbon capture and utilisation

Qualitative Indicator: Entry into force of the Implementing Agreement

Time: Q4 2025

1. Context:

This investment aims to provide support to the production and storage of clean hydrogen. This measure consists of a public investment in a Subsidy Scheme, in order to incentivise private investment and improve access to finance in Finland along the hydrogen value chain and in carbon capture, storage and recovery.

Milestone 17 consists of the entry into force of the Implementing Agreement.

Milestone 17 is the second milestone of the investment, and it follows the completion of milestone 16. It will be followed by target 18 and milestone 18bis, related to the legal subsidy agreements with final beneficiaries and the transfer of funds to Business Finland, respectively. The investment has a final expected date for implementation on 30 June 2026.

2. Evidence provided:

	Name of the evidence	Short description
1	A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.	
2	Implementing Agreement	Implementing Agreement between the Ministry of Employment and Economic Affairs and Business Finland, signed on 29 January 2026

3. Analysis:

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

Entry into force of the Implementing Agreement.

Finland provided a copy of the Implementing Agreement for the use of funds to support investments in low-carbon hydrogen, carbon capture and utilisation, signed between the Ministry of Employment and Economic Affairs and Business Finland on 29 January 2026. Clause 9 of the Implementing Agreement stipulates that the agreement enters into force on the day of its signature.

Furthermore, this is in line with the measure description requirement that, **in order to implement the investment into the Scheme, Finland and Business Finland shall sign an Implementing Agreement (…).**

Furthermore, in line with the description of the measure, **this measure shall consist of a public investment in a Subsidy Scheme, in order to incentivise private investment and improve access to finance in Finland along the hydrogen value chain and in carbon capture, storage and recovery. The Scheme shall operate by providing subsidies directly to the private sector. The Scheme may provide subsidies also to private and/or public research organisations.**

Clause 2(3) of the Implementing Agreement describes that the measure consists of public investment in a subsidy scheme with the objective of incentivising private investment and of improving access to finance for the hydrogen value chain and carbon capture and storage in Finland. The clause further indicates that the scheme will provide support directly to the private sector and that it "may also provide support to private and/or public research organisations".

Furthermore, in line with the description of the measure, **the Scheme shall be managed by Business Finland as the implementing partner.**

Clauses 2(3) and 2(4) of the Implementing Agreement stipulate that Business Finland is the implementing partner of the subsidy scheme.

Furthermore, in line with the description of the measure, **(…) the Implementing Agreement that shall include the following content:**

1. Description of the decision-making process of the Scheme: The final award decision of the Scheme shall be taken by an investment committee or other relevant equivalent governing body and approved by a majority of votes from members who are independent from the government.

Clause 3 of the Implementing Agreement stipulates that all projects shall be submitted to the Governing Board, a governing body equivalent to an investment committee, for decision. The clause further stipulates that the Governing Board will take financing decisions by a majority of members independent from the government.

2. Key requirements of the associated subsidy policy, which shall include:

a. **The description of the subsidies provided and eligible final beneficiaries.**
   The Scheme shall include the product line for low carbon hydrogen and carbon capture and utilisation.

   Clause 4(1) of the Implementing Agreement stipulates that the funding will be allocated through subsidies to support investments in the hydrogen value chain, carbon capture and storage. Clauses 4(1) and 4(3) stipulate eligibility conditions of the final beneficiaries, including companies registered in Finland and research institutes.

b. **The requirement that all investments supported are economically viable.**

   Clause 4(3) stipulates that support will only be provided for economically viable projects.

c. **The requirement to comply with the 'Do no significant harm' (DNSH) principle as set out in the DNSH Technical Guidance (2021/C58/01). In particular, the subsidy policy shall exclude the following list of activities and assets from eligibility: (i) activities and assets related to**

fossil fuels, including downstream use[2], (ii) activities and assets under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks[3], (iii) activities and assets related to waste landfills, incinerators[4] and mechanical biological treatment plants[5].

Clause 4(4) outlines the requirement to comply with the DNSH Technical Guidance (2021/C58/01), including the exclusion list of activities and all the corresponding footnotes.

d. The requirement that final beneficiaries of the Scheme shall not receive support from other Union instruments to cover the same cost.

Clause 4(5) stipulates that the final beneficiaries of the scheme cannot receive support from other European Union instruments to cover the same costs.

3. The amount covered by the Implementing Agreement, the fee structure for the Implementing Partner and the requirement to use any unused proceeds of the scheme, including beyond 2026, for the same policy purposes.

Clause 5(1) of the Implementing Agreement determines the amount of the scheme for a total of EUR 131 534 000 . Clause 5 (3) of the Implementing Agreement determines that the administrative and operational costs have been earmarked and budgeted separately from the amount of the scheme.
Clause 7(2) of the Implementing Agreement stipulates that any unused proceeds, including after 2026, will be used for the same policy objectives of the Scheme.

4. Monitoring, audit, and control requirements, including:

e. The description of the implementing partner's monitoring system to report on the subsidies mobilised.

Clause 8(1) describes the project information system (Eval) to track the projects, including the recording of financing the decision process stages.

[2] Except for (a) assets and activities 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 shall 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 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.

f. The description of the implementing partner's procedures that will ensure the prevention, detection and correction of fraud, corruption, and conflicts of interests.

Clause 8(3) of the Implementing Agreement describes Business Finland's internal control procedures to ensure that fraud, corruption and conflicts of interest can be detected, prevented and corrected, including internal control, compliance and the internal audit service.

g. The obligation to verify the eligibility of every operation in accordance with the requirements laid out in the Implementing Agreement before awarding a subsidy to an operation.

Clause 8(12) of the Implementing Agreement stipulates that Business Finland will verify the eligibility of each project covered by the Implementing Agreement before the decision is taken.

h. The obligation of carrying out risk-based ex-post audits in accordance with an audit plan of Business Finland. These audits shall verify:

i) that the control systems are effective, including the detection of fraud, corruption, and conflict of interests;
ii) compliance with the DNSH principle, the State Aid rules, the climate target requirements; and
iii) that the requirement that final beneficiaries of the Scheme have not received support from other Union instruments to cover the same cost is respected. The audits shall also verify the legality of the transactions and that the conditions of the applicable Implementing Agreement and Subsidy Agreements are being respected.

Clause 8(13) of the Implementing Agreement stipulates that Business Finland will carry out risk-based ex post audits in accordance to an audit plan, which must verify if the control systems are effective, including for detecting fraud, corruption and conflicts of interest; verify compliance with the DNSH principle, State aid rules and climate objective requirements; verify the requirement that final beneficiaries of the Scheme will not receive support from other Union instruments to cover the same costs; and verify the legality of the operations and compliance with the conditions of the Implementing Agreement and the applicable subsidy agreements.

5. Requirements for climate investments carried out by the implementing partner: at least EUR 131 534 000 of the RRF investment into the Scheme shall contribute to the climate change objectives in accordance with Annex VI to the RRF Regulation.

Clause 4(1) stipulates that all supported projects must contribute to the 100% climate target criteria for intervention field 032 in accordance with Annex VI of the RRF regulation.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 24 – Project reports submitted

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

Quantitative Indicator: Number

Baseline: 0

Target: 10

Time: Q2 2026

1. Context:

The objective of this investment is to promote re-use and recycling in Finland. This investment consists of the provision of grants for projects that increase re-use and recycling.

Target 24 requires the completion of at least ten supported projects, corresponding to a reduction capacity of at least 45 622 tonnes of CO2 equivalent.

Target 24 is the last target of the investment, following the completion of milestone 22 related to the publication of the first call for applications and milestone 23 related to the notification of the awards of all grants.

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	List of submitted project reports	Overview of the submitted project reports prepared by Business Finland
3	Project report with reference number 7062/31/2023	Copies of a final project report submitted by the beneficiary to Business Finland
4	Project report with reference number 6814/31/2021	Copies of a final project report submitted by the beneficiary to Business Finland
5	Project report with reference number 7106/31/2021	Copies of a final project report submitted by the beneficiary to Business Finland
6	Project report with reference number 7464/31/2021	Copies of a final project report submitted by the beneficiary to Business Finland
7	Project report with reference number 8197/31/2022	Copies of a final project report submitted by the beneficiary to Business Finland
8	Project report with reference number 8742/31/2021	Copies of a final project report submitted by the beneficiary to Business Finland
9	Project report with reference number 9121/31/2021	Copies of a final project report submitted by the beneficiary to Business Finland
10	Project report with reference number 9327/31/2021	Copies of a final project report submitted by the beneficiary to Business Finland
11	Project report with reference number 9388/31/2021	Copies of a final project report submitted by the beneficiary to Business Finland

12	Project report with reference number 9490/31/2021	Copies of a final project report submitted by the beneficiary to Business Finland

3. Analysis:

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

At least ten project reports shall be submitted by recipient entities.
Ten project reports have been submitted by the beneficiaries of the grants awarded under this investment measure (Items 3-12 on the evidence list). The project reports were submitted by the beneficiaries to Business Finland upon completion of the funded projects. The final section of each project report (titled "Submission") contains information on the submission, including the individual project identifier number and the timestamp of the recipient entity's electronic submission of the document, thereby proving that these project reports were submitted by the recipient entities. The submission of project reports is a requirement for Business Finland to be able to determine the completion of a project before making the final payment to the beneficiary. The project reports were drafted upon completion of the project and they detail the steps taken by the beneficiary to execute the approved project plan, an overview of actually incurred costs compared to the approved cost estimates at the time of submission of the project proposal, the project's results and the project's impacts. The project reports contain the name and ID number of the beneficiary, the grant's unique ID number and the date of submission.

These shall correspond to a reduction capacity of at least 45 622 tonnes of CO2 equivalent.
Three of the project reports submitted report on emissions reduction capacity in terms of CO2 equivalent.

- Item 3 of the evidence list is the project report for the project with reference number 7062/31/2023, which reports a total emission reduction of 13 024 tonnes of CO2 equivalent per year resulting from the project.
- Item 9 of the evidence list is the project report for the project with reference number 9121/31/2021, which reports a total emission reduction of 50 000 tonnes CO2 equivalent per year resulting from the project.
- Item 12 of the evidence list is the project report for the project with reference number 9490/31/2021, which reports a total emission reduction of 99 000 tonnes CO2 equivalent per year resulting from the project.

The reported emissions reduction capacity in these project reports submitted by beneficiaries amounts to a total of 162 024 tonnes of CO2 equivalent, thus exceeding the goal of target 24 by 116 402 tonnes.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 32 – Publication of additional calls for applications regarding support for a low-carbon built environment

Related Measure: P1C3I2 – Low-carbon built environment programme

Qualitative Indicator: Publication additional calls for applications

Time: Q2 2024

1. Context:

The objective of this investment is to accelerate the development and adoption of low-carbon solutions in the built environment. The investment consists of the Low-Carbon Built Environment Programme, which provides grants for projects in this area.

The milestone requires the publication of calls for applications in line with the eligibility and selection criteria included in Milestone 31.

Milestone 32 is the second step in implementing the investment, following Milestone 31 which refers to the launch of the first competitive call for applications regarding the low carbon-built environment programme, and it will be followed by Milestone 33 which requires evidence of budgetary commitment, submission of project reports and a programme report.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.	
2	Ministry of Environment Copy of the second funding call launched 9.5.2022–13.6.2022	The evidence provided is a copy of the call instructions, showing that eligibility criteria of the call is fully aligned with the description of the milestone in the CID Annex.
3	Ministry of Environment Copy of the third funding call launched 17.10.2022–11.11.2022	The evidence provided is a copy of the call instructions, showing that eligibility criteria of the call is fully aligned with the description of the milestone in the CID Annex.
4	Ministry of Environment Copy of the fourth funding call launched 6.2.2023–3.3.2023	The evidence provided is a copy of the call instructions, showing that eligibility criteria of the call is fully aligned with the description of the milestone in the CID Annex.
6	Ministry of Environment Copy and link to the publication of “Vähähiilisen rakennetun ympäristön ohjelma – Ohjeet	The evidence provided is a description and application instructions of the funding programme. It contains the eligibility criteria and the terms of reference with the CID

	valtionavustuksen hakijoille ja saajille” Also available at: https://api.hankeikkuna.fi/asiakirjat/27e805d9-0af4-45d1-af08-282717178a7a/95983e3a-6904-49a2-9a98-2798691c9093/SUUNNITELMA_20220114104333.pdf	requirements. Annexes 4-6 show that an accessible link to this document has been included in the calls 2, 3 and 4.
7	Ministry of Environment Copy of the Do No Significant Harm (DNSH) principle (annex in the call for applications) Also available at: https://ym.fi/documents/1410903/194960249/DNSH_FI.pdf/64578b4e-923a-fc31-fc8a-98f62709cb60/DNSH_FI.pdf?t=1702554082993	The evidence provided is a document that offers additional information on the DNSH principle, including a list of environmentally harmful activities considered under this principle. All Ministry of the Environment’s funding calls included a link to the document (see link on the left column).

3. Analysis:

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

Publication of additional calls for applications in line with the eligibility/selection criteria indicated in Milestone 31.
Furthermore, in line with the milestone name, **Publication of additional calls for applications regarding support for a low-carbon built environment”.**

Milestone 3131 required the terms of reference of calls for applications regarding support for a low carbon built environment to include eligibility criteria that ensure that the selected projects comply with the ‘Do No Significant Harm’ Technical Guidance (2021/C58/01) and relevant EU and national environmental legislation. The "terms of reference" are understood to encompass the call text (evidences 2-5), the application instructions (evidence 6), and the additional information document on the Do No Significant Harm (DNSH) principle (evidence 7). Together, these documents outline the eligibility criteria, compliance requirements, and the scope of the funding call.

A total of six calls were launched under the Low-Carbon Built Environment Programme, with the selection and eligibility criteria for the first two calls (one by the Ministry of Environment and one by Business Finland) assessed in Milestone 31 under Finland’s first payment request.
The first two calls, launched within the framework of the Low-Carbon Built Environment Programme (one by the Ministry of Environment and one by Business Finland), had their selection and eligibility criteria assessed in Milestone 31 under Finland’s first payment request.

Finland has provided corresponding evidence of the publication of the calls in line with the eligibility / selection criteria indicated in Milestone 31. The Ministry of Environment published additional calls on their webpage that were not already assessed under Milestone 31 as follows:

i. **Publication of the second call by the Ministry of Environment** for promotion of low carbon built environment was launched on 9 May 2022 and closed 13 June 2022 (evidence 2).

Section “Construction must become lower-carbon — but adaptation is also necessary” *(Rakentamisesta saatava vähähiilisempää – mutta sopeutuakin pitää)* (evidence 2, p.2), specifies the scope of the call as in the Milestone 31 description by including a focus on accelerating the development and deployment of climate friendly low-carbon solutions in the built environment. In addition, the funding call includes the application instructions (evidence 6) and section 1 “Objectives of the support programme” (*Tukiohjelman tavoitteet* p.4, paragraphs 3-5), further specifies that the investment measure promotes climate change mitigation and adaptation, focusing on research and innovation activities, technology transfer and cooperation between research, business and municipalities.

Reference to the requirement to comply with the Do No Significant Harm principle is under “Background” (*Tausta)* (evidence 2, pp. 1-2) and section “Impact and innovativity are valued in applications” *(Hakemuksissa arvostetaan vaikuttavuutta ja innovatiivisuutta)* which states that, to be eligible and considered for selection, projects need to comply with the DNSH Technical Guidance (evidence 2, p. 2). The funding call also includes an explanatory annex (evidence 7), that lists the DNSH related provisions. Moreover, pp. 7-8 of the application instructions (evidence 6), included as an annex in the funding call, state that only activities that comply with relevant EU and national environmental legislation can be selected and it includes the exclusion list as specified in the description of the milestone 31.

ii. **Publication of the third call by the Ministry of Environment** related to the promotion of a low-carbon built environment was launched on 17 October 2022 and closed on 11 November 2022 (evidence 3).

Section “Construction must become lower-carbon — but adaptation is also necessary” *(Rakentamisesta saatava vähähiilisempää – mutta sopeutuakin pitää)* (p.2, evidence 3), specifies the scope of the call as described in Milestone 31 by including a focus on accelerating the development and deployment of low-carbon solutions in the built environment. In addition, the funding call includes the application instructions (evidence 6) and section 1 “Objectives of the support programme” (*Tukiohjelman tavoitteet* p.4, paragraphs 3-5), further specifies that the investment measure promotes climate change mitigation and adaptation, focusing on research and innovation activities, technology transfer and cooperation between research, business and municipalities.

Reference to the requirement to comply with the Do No Significant Harm principle is under “Background” (*Tausta)* (evidence 3, pp. 1-2) and section “Impact and innovativity are valued in applications” *(Hakemuksissa arvostetaan vaikuttavuutta ja innovatiivisuutta)* which states, that to be eligible and considered for selection, projects need to comply with the DNSH Technical Guidance (evidence 3, p. 2). The funding call also includes an explanatory annex (evidence 7), that lists the DNSH related provisions. Moreover, pp. 7-8 of the application instructions (evidence 6), included as an annex in the funding call, state that only activities that comply with relevant EU and national environmental legislation can be selected and it includes the exclusion list as specified in the description of the milestone 31.

iii. **Publication of the fourth call by the Ministry of Environment** related to the promotion of a low-carbon built environment was launched on 6 February 2023 and closed on 3 March 2023 (evidence 4).

Section “Construction must become lower-carbon — but adaptation is also necessary” *(Rakentamisesta saatava vähähiilisempää – mutta sopeutuakin pitää)* (p.2, evidence 4), specifies the scope of the call as described in Milestone 31 by including a focus on

accelerating the development and deployment of low-carbon solutions in the built environment. In addition, the funding call includes the application instructions (evidence 6) and section 1 “Objectives of the support programme” (*Tukiohjelman tavoitteet* p.4, paragraphs 3-5), further specifies that the investment measure promotes climate change mitigation and adaptation, focusing on research and innovation activities, technology transfer and cooperation between research, business and municipalities.

Reference to the requirement to comply with the Do No Significant Harm principle is under “Background” (*Tausta)* (evidence 4, pp. 1-2) and section “Impact and innovativity are valued in applications” *(Hakemuksissa arvostetaan vaikuttavuutta ja innovatiivisuutta)* which states, that to be eligible and considered for selection, projects need to comply with the DNSH Technical Guidance (evidence 4, p. 2). The funding call also includes an explanatory annex (evidence 7), that lists the DNSH related provisions. Moreover, pp. 7-8 of the application instructions (evidence 6), included as an annex in the funding call, state that only activities that comply with relevant EU and national environmental legislation can be selected and it includes the exclusion list as specified in the description of the milestone 31.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 59 – Test track equipped with radio-based ERTMS

Related Measure: P2C1I2 – Transport and land use – Digirail project

Qualitative Indicator: Test track equipped with radio-based ERTMS

Time: Q4 2024

1. Context:

The objective of this investment is to test the European Rail Traffic Management System (ERTMS) in Finland's rail network. The investment will support the installation of the ERTMS system in a pilot track.

The milestone consists of equipping a test track located between Kouvola-Kotka and Hamina with radio-based ERMTS

Target 59 is the second target of the investment, and it follows the completion of milestone 58 related to the establishment of an ERTMS test laboratory available to run virtual simulation tests. It will be followed by target 60, related to installing a radio-based ERTMS system in a commercial pilot track. 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 duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.	
2	Certificate of completion of the test track	Copy of the certificate of completion of the test track signed by the Finnish Transport Infrastructure Agency (FTIA)
3	Agreement for supplying ETCS	Copy of the signed agreement between FTIA and the supplier with the annexed technical requirements of the European Trail Control System (ETCS)
4	Purchase order for ETCS	Copy of the signed purchase order for the ETCS
5	Minutes of acceptance inspection of ETCS	Copy of the signed minutes of acceptance inspection of the ETCS
6	Meeting minutes of ETCS SAT works	Copy of the signed minutes of acceptance inspection of SAT works by FTIA
7	Acceptance letter by FTIA of the SAT works	Copy of the signed acceptance letter of SAT works by FTIA
8	Offer of SAT	Copy of the signed offer of supplier to perform Site Acceptance Testing (SAT) works
9	Purchase order of the SAT	Copy of the signed purchase order from FTIA for supplier to perform Site Acceptance Testing (SAT) works
10	Traficom opinion	Copy of the Finnish Transport and Communications Agency (Traficom) opinion on the radio-based system installed on the Kouvola/Kotka - Hamina line

3. Analysis:

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

The test track located between Kouvola-Kotka/ Hamina shall be equipped with radio-based ERMTS.

Finland provided a certificate of completion of the equipment of radio-based ERTMS on the test track (item 2 of the evidence list) located between Kouvola-Kotka and Hamina (KoKoHa), signed by the Finnish Transport Infrastructure Agency (FTIA) on 19 May 2025.

This is further evidenced by the agreement between FTIA and the supplier of the signalling system and the respective purchase order (items 3 and 4 of the evidence list) describing the technical requirements of the European Train Control System (ETCS) in point 2a and b. The minutes of the acceptance inspection signed by FTIA and the supplier (Thales) (item 5 of the evidence list) related to the procurement of the ETCS equipment confirm that the works of equipping the test track with radio-based ERTMS have been concluded on 31 March 2025.

Meeting minutes of acceptance inspection titled “ETCS track deployment tasks 2023 finalisation”, signed by FTIA and a consultant, Sweco Finland Oy, (item 6 of the evidence list), and an acceptance letter by FTIA (item 7 of the evidence list), provided by Finland, show that the consultant completed testing works, described in the signed offer and purchase order of that consultant (items 8 and 9 of the evidence list), which included site acceptance testing (SAT) inspections of the KoKoHa ETCS test track, further verifying that the test track allowed testing of the radio-based system.

Finland has provided a statement signed on 12 December 2024 by the Finnish Transport and Communications Agency (Traficom), the Finnish national safety authority for the railway system (item 10 of the evidence list), following a site inspection and test runs on the test track, and analysis of technical and procurement documentation by Traficom. This statement confirms that the test track in KoKoHa has been equipped with radio-based ERTMS.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 62 - Report on the exchange of digital business information

Related Measure: P2C2I1 - Digital economy – Real-time economy (RTE) programme

Qualitative Indicator: Publication of a report

Time: Q4 2024

1. Context:

The objective of this investment is to create common solutions and structures to facilitate the exchange of digital financial data between organisations in a structured machine-readable format (e-invoices, e-receipts and procurement documents). The measure consists of the establishment of a minimum viable ecosystem (MVE) for e-invoices and the publication of a report on exchanging digital business information.

Milestone 62 consists of the publishing of the report on the exchange of digital business information.

Milestone 62 is the second milestone of the investment, and it follows the completion of milestone 61, related to the creation and of a minimum viable ecosystem for the circulation of e-invoices.

2. Evidence provided:

	Name of the evidence	Short description
1	A summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.	
2	Final Report	Copy of Final Report "The company's digital economy project"
3	Published webpage	Hyperlink and copy of pdf version of webpage with the published report and annexes, https://www.prh.fi/fi/tietoa_prhsta/ajankohtaista/projektit/yrityksen_digitalous.html
4	Steering committee minutes approving final report	Copy of steering committee minutes of 18 December 2024
5	Annex to final report on e-receipts	Copy of Annex 9 of the Final Report on e-receipts
6	Steering committee minutes approving e-receipts pilot	Copy of Steering committee minutes of 19 November 2024
7	Annex to final report on procurement messages	Copy of Annex 8 of the Final Report on procurement messages
8	Report on procurement messages pilot	Copy of Report on the procurement messages pilot for the Construction Industry
9	Steering committee minutes approving procurement messages pilot	Copy of Steering committee minutes of 5 November 2024

3. Analysis:

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

Publication of a report on the exchange of digital business information…
Furthermore, in line with the measure description, **the measure consists (…) of the publication of a report on exchanging digital business information.**

Finland has provided a final report named "The company's digital economy project" (item 2 of the evidence list) and provided a hyperlink and a pdf version of the webpage where the report, and its annexes, were published (item 3 of the evidence list) on 19 December 2024. The Commission services accessed the link provided by the authorities on 19 January 2026 to verify the publication of the report and its annexes. This check was completed successfully, confirming that the report on exchanging digital business information was published. Furthermore, Finland has provided the minutes of the Steering committee meeting where the report was approved (item 4 of the evidence list), as evidenced in section 2.2 "The steering group approved the final report of the project and its annexes".
The final report describes the "company's digital economy project", and it indicates in section 1.3 that it concerns the creation of common solutions and structures "to facilitate the exchange of digital financial information between organisations in a machine-readable structured format (e.g. e-invoices, e-receipts, procurement messages, financial information) (…) in both the public and private sector".

…which shall describe the pilot projects for exchanging e-receipts and procurement messages.
The final report describes, in section 4.1 "Providing e-receipts through the accounting unit's customer service" of Annex 9 "E-receipts" (item 5 of the evidence list), the pilot project carried out for exchanging e-receipts, involving the National Board of Patents and Registration (NPBR), ReceiptHero Oy, Computer Program Oy and Valtori. The pilot project's objective was to "compile the requirements needed for offering e-receipts in accounting units and to test the transmission of e-receipts at the point of purchase". Section 4.1.1 of the Annex describes the development of technical specifications concerning the transmission of receipts for buyers who e-receipt agreements. Section 4.1.2 describes the pilot carried out to demonstrate the transmission of e-receipts carried out through the secure connection required by NPBR). Section 4.1.3 outlines the positive results of the pilot project, whereby e-receipts were exchanged. Finland further provided the minutes of the steering committee of the Real Time Economy of 19 November 2024 (item 6 of the evidence list), which approves, in paragraph 1.1, the pilot project for e-receipts developed.

The final report describes, in section 3.7.2 of Annex 8 "Procurement messages" (item 7 of the evidence list), the pilot projects carried out for exchanging procurement messages, including a pilot on the use of PEPPOL procurement messages for the construction industry, whereby representatives of the construction industry reviewed PEPPOL purchase messages, created examples of order chains and transmitted procurement messages between PEPPOL providers, concluding that the digitalization of ordering processes benefit the construction industry. Finland also provided a separate detailed report on the pilot developed for the construction industry (item 8 of the evidence list). Finland further provided the minutes of the steering committee of the Real Time Economy of 19 November 2024, which approves, in paragraph 1.1, the pilot for procurement messages developed.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 75 – A digital platform for cybersecurity training

Related Measure: P2C3I1 Civilian cybersecurity skills

Qualitative Indicator: Training platform publicly available

Time: Q4 2024

1. Context:

The objective of the investment is to increase basic cybersecurity skills of the general population to ensure that citizens can use digital services safely and identify the risks associated with the use of different devices, products and services.

The milestone consists of a research report on how EU Member States train citizens in basic cybersecurity and making publicly available a digital platform for cybersecurity training.

Milestone 75 is the only milestone of this investment. The investment has a final expected date for implementation by the end of 2024.

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	Research report "Cyber citizen skills and their development in the European Union"	A research report by Aalto University Research Group on how EU Member States train citizens in basic cybersecurity. The research has been published in a report with the title 'Cyber citizen skills and their development in the European Union' at: https://cyber-citizen.eu/en/materials/
3	Hyperlinks to the cybersecurity training platform, SecPort	Hyperlinks to various elements of the cybersecurity training platform (https://www.secport.org/) evidencing that the platform is publicly available and available in all 24 EU languages. The document also includes screenshots of the associated pages behind the hyperlinks.

3. Analysis:

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

A research report on how EU Member States train citizens in basic cybersecurity shall be accessible online.

Item 2 of the evidence provided is a research report by Aalto Research Group published in February 2023 titled "Cyber citizen skills and their development in the European Union". As explained in

section “1.1. Background and objectives of the study”, the report “focuses on the current state of cyber citizen skills education and training across the European Union and the required substance of cyber citizen skills in the EU”. The findings for each Member State are covered under the section “Analyses of individual countries”. Hence, the research report covers how EU Member States train citizens in basic cybersecurity.

The Commission services accessed the link provided by the authorities on 18 December 2025 to verify that item 2, the research report submitted as evidence, was published online. This check was completed successfully, confirming that the research report is accessible online.

A digital platform for cybersecurity training shall be accessible online in 24 EU languages.

Item 3 of the evidence provided includes hyperlinks to SecPort, a digital platform for cybersecurity training and the corresponding screenshots of the webpages. The platform is available in 24 EU languages which can be selected from a dropdown list from the menu displayed at top of the platform. The screenshots on pages 1-8 of item 3 also correspond to the home pages of the 24-language versions of the platform. Furthermore, the links provided in item 3 illustrate that the platform includes various content for cybersecurity training such as courses (page 9), games (page 10), and educational materials including infographics, guides and videos (pages 10-21). Furthermore, as shown in item 3, the topics covered include cybersecurity essentials (page 9), disinformation (page 16), cyberbullying (page 11), scams (page 13) and digital footprint (page 12). These webpages correspond the screenshots included in item 3 for each link.

The Commission services accessed the links provided by the authorities in item 3 on 18 December 2025 to verify that the platform was available online and included the features described above. This check was completed successfully, confirming that the platform is accessible online in 24 EU languages.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 78 - Number of job search interviews conducted by public employment services

Related Measure: P3C1R1 - Nordic Model of Employment Services

Quantitative Indicator: Number

Baseline: -

Target: 2,200,000

Time: Q2 2024

1. Context:

The objective of the measure is to reform the public employment services process. The reform consists of transitioning towards a new Nordic model of employment services involving personalised and integrated services for jobseekers and an active search obligation for job-seekers, as well as a digital information system for public employment services.

Target 78 provides for the number of job search interviews between 1 January 2023 and 30 June 2024 to at least 2,200,000.

Target 78 is the third and last target of the reform, and it follows the completion of milestone 77 on the entry into force of the law on Public Employment and Business Service regulating the Nordic employment service model for the jobseeker's service progress and milestone 79, related to the integration of digital functionalities by the Nordic employment service model into the public employment services' information system.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.	
2	List of 2,226,307 job search interviews conducted	A list of customer meetings organised for jobseekers in accordance with the Nordic labour market service model (between 1 January 2023 and 30 June 2024). The list includes the client identification number, date of each interview, the type of interview and the client's background information. The list is based on register data based on entries made in the national Customer Data System (URA) in connection with interviews.
3	Screenshots of the sample of 60 interview entries in the national Customer Data System (URA)	

3. Analysis:

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

The number of job search interviews by public employment services between 1 January 2023 and 30 June 2024 shall be at least 2,200,000.

The list of job search interviews (evidence 2) details that 2,226,307 interviews by public employment services took place between 1 January 2023 and 30 June 2024.

Following the selection of a random sample of 60 units, Finland submitted screenshots of interviews entries (item 3) in the national customer data system (URA) specifying that the job search interviews took place within the monitoring period. The evidence provided for a sample of 60 units confirmed that this requirement of the target has been met as the job search interviews by public employment services had taken place between 1 January 2023 and 30 June 2024 as demonstrated by the entries in the URA system, thus exceeding the goal of Target 78 by 26,307 interviews.

On 6 February 2026, the Commission services conducted an on-the-spot check in the national Customer Data System (URA) database to verify the sampled data against the information provided in the full list of interviews conducted by public employment services between 1 January 2023 and 30 June 2024 (item 2). This check was completed successfully, confirming that at least 2,200,000 job search interviews, were conducted over the period.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 84 – Decrease in the average number of days for processing residence permit applications based on work and education

Related Measure: P3C1R3 – Streamlining the work and education-based immigration process

Quantitative Indicator: Number

Baseline: 52.6

Target: 30

Time: Q4 2024

1. Context:

The objective of the reform is to streamline the administrative procedures for granting residence permits based on work and education. The measure consists of a cross-administrative project on (i) streamlining relevant immigration legal acts, (ii) creating a "fast-track" for growth entrepreneurs, specialists and their accompanying family members, and (iii) investing in digital infrastructure.

Target 84 provides for a shortened processing time to 30 days on average for granting work- and education-based residence permits. The target applies to the processing of electronic residence permit applications over a six-month period during 2024. In addition, new features of the digital infrastructure managed by the Finnish Immigration Services (Migri) may include, but is not limited to:

(i) new digital functionalities; (ii) system integration and data transfer; (iii) registration and processing of applications; (iv) inter-sectoral knowledge-based management; (v) customer guidance and communications; and (vi) usability, performance and automation.

Target 84 is the final target of the reform, and it follows the completion of milestones 81 and 82 related to legislative amendments of the act concerning students, researchers and trainees and of the Aliens' Act respectively, as well as milestone 83 related to establishment of the fast-track for processing residence permits for specialists, growth entrepreneurs and their accompanying family members.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.	
2	Annual Report 2024 of Finnish Immigration Service	Copy of the annual report and final accounts of the Finnish Immigration Service for the year 2024 and a link to where it is published on the Finnish Immigration Service website https://migri.fi/en/-/finnish-immigration-service-achieved-significant-reforms-and-development-in-2024. The report is dated 28 February 2025.
3	Report on residence permit processes 2021-2024	Report by the Finnish Immigration Service: P3C1R3: A report on accelerating work- and education- based residence permit processes 2021-2024
4	Screenshots I	A document compiling screenshots from

	Section i) Section ii) Section iii) Section iv) Section v) Section vi)	the EnterFinland, UMA, PowerBI tool and other relevant official databases for • Average time for processing education and work-based residence permits (section i, chapter 1 of screenshots I) • Length of the education permits (section i, chapter 1 of screenshots I) • Type of the permits (section i, chapter 1 of screenshots I) • Employee certification (section i, chapter 2 of screenshots I) • Work conditions (section i, chapter 3 of screenshots I) • Integration and data transfer with incomes register (section ii, chapter 1 of screenshots I) • Integration and data transfer with study info (section ii, chapter 2 of screenshots I) • EnterFinland for Employers: representing multiple employers (section iii, chapter 1 of screenshots I) • EnterFinland for Employees: sharing the application with employers (section iii, chapter 2 of screenshots I) • Risk based reporting (section iv, chapter 1 of screenshots I) • Application form with guiding questions (section vi, chapter 1 of screenshots I) • Automatic initiation of extended permits in UMA (section vi, chapter 2 of screenshots I)
5	Screenshots II	A document compiling screenshots from the internet pages for the customer guidance and communications: • A customer bulletin about the guides for students and employee: https://migri.fi/en/-/are-you-coming-to-finland-to-work-or-study-check-out-our-new-guides-to-learn-how-to-apply-for-a-residence-permit-for-finland • Ministry for Foreign Affairs: guides for students and employees: ○ https://um.fi/residence-permits-to-finland ○ https://finlandabroad.fi/web/mne/residence-permits-to-finland • Guides for employees: https://www.workinfinland.com/en/get-started/migri-widget/ • Guides for employees and students: ○ https://tyomarkkinatori.fi/en/personal-customers/information-about-working-life/internationality/coming-to-finland-from-abroad/applying-for-a-residence-permit-as-an-employee ○ https://tyomarkkinatori.fi/en/personal-customers/information-about-working-life/internationality/studying-in-finland • Guides for students and employed persons ○ https://dvv.fi/en/guide-for-students ○ https://dvv.fi/en/guide-for-employed-persons • Information on Fast Track and D-visa OLEDES interface, updates to the Migri.fi website and EnterFinland's customer instructions, social media posts, social media marketing ○ https://migri.fi/en/-/fast-track-service-can-help-you-obtain-a-residence-permit-in-two-weeks-from-1-june-2022 ○ https://migri.fi/en/-/specialists-and-start-up-entrepreneurs-entry-becomes-quicker-fast-track-service-will-be-introduced-on-

		1-june ○ https://www.youtube.com/watch?v=dbSpRci99YQ ○ https://www.youtube.com/watch?v=_GLI1BG2i-o ○ https://www.youtube.com/watch?v=QQMy_sO21yo ○ https://www.youtube.com/watch?v=PTlU4OOPeXE ○ https://migri.fi/documents/5202425/134237837/Instructions+for+specialists+who+are+applying+residence+permit+via+the+fast-track+process.pdf/846b7f1d-209d-27e2-d0ff-3a5fe2567265/Instructions+for+specialists+who+are+applying+residence+permit+via+the+fast-track+process.pdf?t=1671690148931 • Information on changes in student and researcher law ○ https://www.youtube.com/watch?v=5rNZhTmxAYk ○ https://migri.fi/-/haetko-opiskelijan-tai-tutkijan-oleskelulupaa-oleskeluluvan-hakeminen-helpottuu-15-4-2022-alkaen ○ https://migri.fi/-/kansainvalisten-opiskelijoiden-muutto-suomeen-helpottuu • Information on UMALite: https://migri.fi/en/-/are-you-planning-to-apply-for-a-residence-permit-as-a-start-up-entrepreneur-you-can-now-apply-for-an-eligibility-statement-from-business-finland-online-in-enter-finland • Information on Income register check: https://migri.fi/en/-/incomes-register-makes-it-easier-to-prove-your-income-as-of-19-january-2023 • Information on reform of the Aliens Act ○ https://migri.fi/en/-/are-you-applying-for-a-residence-permit-on-the-basis-of-work-or-are-you-an-employer-read-below-to-learn-how-the-aliens-act-will-change-on-23-february-2023 ○ https://migri.fi/en/-/amendments-to-the-aliens-act-enable-more-efficient-services-for-employees-and-employers ○ https://www.youtube.com/watch?v=Y1MGgDPqoXo ○ https://migri.fi/-/henkilotyonantajat-voivat-nyt-asioida-tyonantajan-enter-finlandissa
6	Hankesalkku – Status report	Compilation report of status reports from the national project reporting tool Hankesalkku, demonstrating the stages in introducing the different new functionalities. These reports are based on guidance VN/15307/2019 VN/15307/2019-VM-3 from the Ministry of Finance, available in https://vm.fi/documents/10623/355484/Ohje+Yhteiset+periaatteet+valtionhallinnon+ICT-hankkeiden+raportointi.pdf/0aaab01c-bdee-1c6d-a285-5f0d9785f2ef/Ohje+Yhteiset+periaatteet+valtionhallinnon+ICT-hankkeiden+raportointi.pdf?t=1644312775010

3. Analysis:

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

The Commission services conducted on-the-spot checks on 26 November, 2 December and 16 December 2025 in the Finnish Immigration Service information systems and the Enter Finland system to verify the average time required for the work and education-based permits against the

figure provided in the Summary Document and the features of the digital infrastructure. The checks were performed against the updated CID, adopted by COM on 12 December 2025.

The checks were carried out as outlined below:

The processing time for granting electronic work- and education-based residence permits granted shall be shortened to 30 days as an average during a six-month period in 2024

The Commission services conducted an on-the-spot check on 26 November, 2 December and 16 December 2025 on the Power BI tool to verify the average time for granting electronic work- and education-based residence permits. Data on the processing times is transferred from the Immigration Service case management system (UMA) to a database where raw data from the case management system is stored. Processing time statistics are calculated in Power BI using data stored in the data warehouse. This check was completed successfully confirming that an average processing time for work and education-based permits granted was 18.4 days between 01 July 2024 – 31 December 2024. This average processing time for granting electronic work- and education-based residence permits is also demonstrated in Picture 4 on page 17 of the Report on residence permit processes 2021-2024 (item 3 on the evidence list). In addition, the chart 1 on page 13 of the Annual Report 2024 of the Finnish Immigration Service (item 2 on the evidence list) demonstrates that the target of 30 days or less on average was reached for every month in 2024.

In addition, new features of the digital infrastructure managed by the Finnish Immigration Services (Migri) may include, but is not limited to:

- new digital functionalities;

The Commission services conducted an on-the-spot check to verify the new digital functionalities of the digital infrastructure of Immigration Service, which were prompted by the amended legislation. This new legislation was assessed under M81 in the context of the 2nd payment request and M82 in the context of the 3rd payment request. These new digital functionalities relate to the interaction between the UMA case management system used by the authorities and EnterFinland system, where applicants and employees fill information. This check was completed successfully on 26 November, 2 December and 16 December 2025 confirming the following new functionalities described under Chapter 7, Section i) of the Report by the Finnish Immigration Service – P3C1R3 (item 3 on the evidence list):

- Changes in the EnterFinland portal and the UMA case management system following the *reform of Act concerning students, researchers and trainees (Act 719/2018)* (legislation assessed under M81):
  - Screenshots in the section i), chapter 1 of the Screenshots I document (item 4 on the evidence list) demonstrates that the residence permits cover the entire duration of the studies. The on-the-spot verification demonstrated that once the duration of the studies is filled in the EnterFinland, UMA retrieves the information from there and the length of the permit is determined on this basis for the duration of the studies (or potentially longer, if the applicant wishes to arrive in Finland a little earlier).
  - Last screenshot in the section i, chapter 1 on page 10 of the Screenshots I document (item 4 on the evidence list) demonstrates the permit type to be type A - continuous (compared to the previous temporary permit). The on-the-spot checks confirmed that the parameters for the study-based permits reflect the change in legislation and the permit type granted is A, which is the continuous permit.
- Changes in the EnterFinland portal and the UMA case management system following the *reform of Aliens Act (Act 301/2004)* (legislation assessed under M82):

- Screenshots in the section i, chapter 2 of the Screenshots I document (item 4 on the evidence list) demonstrates the application form for employers to apply for employee certification in EnterFinland and the employer certification process in UMA. The on-the-spot checks verified the form the employers fill in to apply for the employee certification and the process for certification.

- Screenshots in the section i, chapter 3 of the Screenshots I document (item 4 on the evidence list) demonstrates the work conditions' functionality enabling data collection, handling and automation as well as integration between UMA case management system and Enter Finland. The on-the-spot checks demonstrated the filling in the work conditions in EnterFinland and how the information is then retrieved in UMA case management system, where it is still possible to update this information, if needed. When the employer is certified, the work conditions are automatically filled. Page 14 of item 6 on the evidence list (Hankesalkku status report) refers to introduction of this functionality.

The on-the-spot checks confirmed the new digital functionalities of the UMA case management system and Enter Finland system. On this basis, the Commission confirmed that the data provided matched the evidence submitted by the Member State for demonstrating the specific requirement as set out in the Council Implementing Decision.

- system integration and data transfer;

The Commission services conducted an on-the-spot check on 26 November, 2 December and 16 December 2025 to verify the system integration and data transfer functionality between different databases. This check was completed successfully confirming the functionalities described under Chapter 7, Section ii) of the Report by the Finnish Immigration Service – P3C1R3 (item 3 on the evidence list):

- Screenshot in section ii, chapter 1 of the Screenshots I document (item 4 on the evidence list) demonstrates the functionality between the income register (Tulorekisteri) and UMA case management system. The on-the-spot verification demonstrated how UMA makes a check from the income register managed by the Finnish tax administration. Page 18 of item 6 on the evidence list (Hankesalkku status report) refers to introduction of this functionality.

- Screenshots in section ii, chapter 2 of the Screenshots I document (item 4 on the evidence list) demonstrates the functionality between the StudyInfo Register (Opintopolku) and UMA case management system. On the spot checks demonstrated how, on the basis of the student number, UMA verifies that the study place has been granted from the studyInfo register. Also, the personal information is checked against the study number. Page 14 of item 6 on the evidence list (Hankesalkku status report) refers to introduction of this functionality.

The on-the-spot checks confirmed new system integration and data transfer features enabling the case officers' access to data required during the permit process. On this basis, the Commission confirmed that the data provided matched the evidence submitted by the Member State for demonstrating the specific requirement as set out in the Council Implementing Decision.

- registration and processing of applications;

The Commission services conducted an on-the-spot check on 26 November, 2 December and 16 December 2025 to verify the registration and processing of applications functionality. The checks related to EnterFinland, introducing new functionality for applicants and employers and their agents during the registration process and the processing of applications. This check was completed successfully confirming the functionalities introduced in Enter Finland described under Chapter 7, Section iii) of the Report by the Finnish Immigration Service – P3C1R3 (item 3 on the evidence list):

- Screenshots in section iii, chapter 1 of the Screenshots I document (item 4 in the evidence list) demonstrates the possibility to represent multiple companies. On the spot checks demonstrated how one agent can act for several employers. Page 5 of item 6 on the evidence list (Hankesalkku status report) refers to introduction of this functionality.

- Screenshots in section iii, chapter 1 of the Screenshots I document (item 4 in the evidence list) demonstrates the possibility to share/unshare the residence permit application with an employer after submitting an application in EnterFinland. On the spot checks demonstrated the functionality for sharing and unsharing the residence permit application, once the application had been filled. Page 1 of item 6 on the evidence list (Hankesalkku status report) refers to introduction of this functionality.
- Screenshots in the Screenshots I document (item 4 on the evidence list) demonstrate the mass payment of applications. On the spot checks demonstrated the payment for several application at the same time. Page 7 of item 6 on the evidence list (Hankesalkku status report) refers to this upcoming development.

The on-the-spot checks confirmed new functionalities related to the registration and processing of applications in EnterFinland for employers and employees. It demonstrated specifically representation of multiple employers by one agent, mass payment of applications and sharing/unsharing of applications with the employers. On this basis, the Commission confirmed that the data provided matched the evidence submitted by the Member State for demonstrating the specific requirement as set out in the Council Implementing Decision.

- inter-sectoral knowledge-based management;

The Commission services conducted an on-the-spot check on 26 November, 2 December and 16 December 2025 to verify the new inter-sectoral knowledge-based management functionality. The checks related to collection of information on applications which allow to steer the application process and communication campaigns. This check was completed successfully confirming the functionalities introduced in Enter Finland described under Chapter 7, Section v) of the Report by the Finnish Immigration Service – P3C1R3 (item 3 on the evidence list):

- Screenshots in section iv, chapter 1 of the Screenshots I document (item 4 on the evidence list) demonstrate basket-based reporting. The on-the-spot checks demonstrated the functionality of creating baskets in UMA and then generating reports in the PowerBI Tool. Basket-based reporting allows grouping applications according to their risk levels, allowing focus on tracking of applications processing and of the risk applications. Basket-based reporting allows for better process management and allocation of resources. On the spot checks demonstrated how the automatic screening of information revealed that information provided did not match the information in another registry (study number in the study registry). This prompted an automatic forwarding of the application for closer investigation. Pages 11-12 of item 6 on the evidence list (Hankesalkku status report) refers to introduction of this functionality.

- Screenshots in section iv, chapter 1 of the Screenshots I document (item 4 on the evidence list) demonstrates the website analytics producing information regarding the visits on the Finnish Immigration Service website. On-the-spot checks verified the information provided by Matomo website analytics tool on users, applying parameters such as time, type of permit, used device and visitors' geographical location. Information from the tool is used especially to monitor geographical distribution of the visits and the traffic on the site following advertising campaigns. Page 14 of item 6 on the evidence list (Hankesalkku status report) refers to this upcoming development.

The on-the-spot checks confirmed inter-sectoral knowledge-based management on the basis of risk-based reporting and website analytics. On this basis, the Commission confirmed that the data provided matched the evidence submitted by the Member State for demonstrating the specific requirement as set out in the Council Implementing Decision.

- customer guidance and communications;

Chapter 7, Section vi) of the Report by the Finnish Immigration Service – P3C1R3 (item 3 on the evidence list) describes customer guidance and communications activities, which are evidenced in the Screenshots document II (item 5 on the evidence list). The Commission services accessed the links provided by the authorities on 20 January 2026 to verify that customer guidance and communications took place to inform the users of the EnterFinland services about the new functionalities, legislative changes and process changes. The check included

- **A customer bulletin about the guides for students and employee** (page 1 of the item 5 on the evidence list).
- **Ministry for Foreign Affairs: guides for students and employees** on residence permits to Finland
  - Webpages (page 1 of the item 5 on the evidence list)
  - Finlandabroad.fi -webpages: e.g. Montenegro (page 4 of the item 5 on the evidence list).
- **Guides for employees** on the website of Work in Finland (page 6 of the item 5 on the evidence list).
- **Guides for employees and students** on the local employment and Economic development Office (TE office)/ Työmarkkinatori.fi -webpages
  - Employees (page 7 of the item 5 on the evidence list)
  - Students (page 8 of the item 5 on the evidence list)
- **Guides for students and employed persons** on the Digital and population data services agency of Finland/DVV.fi-webpages:
  - Students (page 8 of the item 5 on the evidence list)
  - Employed persons (page 10 of the item 5 on the evidence list)
- **Information on Fast Track and D-visa OLEDES interface, updates to the Migri.fi website and EnterFinland's customer instructions, social media posts, social media marketing**
  - **Customer bulletin about the fast track and D visa** (page 12 of the item 5 on the evidence list)
  - **Customer bulletin about the fast track and D visa** (page 13 of the item 5 on the evidence list)
  - **Webinar about the fast track service** (page 18 of the item 5 on the evidence list)
  - **Commercial video about the fast track service**: (page 18 of the item 5 on the evidence list)
  - **Tutorial video about how to apply for a residence permit using the fast track service** (page 18 of the item 5 on the evidence list)
  - **Tutorial video about how to apply for a residence permit for a start-up** entrepreneur **via the fast-track service** (page 19 of the item 5 on the evidence list)
  - **Guide on fast track for a specialist** (page 19 of the item 5 on the evidence list).
- **Information on changes in student and researcher law**
  - Youtube information session for educational institutions (page 25 of the item 5 on the evidence list).
  - Customer bulletin for students in Migri webpage about the changes in student and researcher law (page 25 of the item 5 on the evidence list).
  - Media release for students about the changes in student and researcher law in Migri webpage (page 27 of the item 5 on the evidence list).
- **Information on UMALite** in Migri website (page 30 of the item 5 on the evidence list)
- Information **on Income register check** in Migri website (page 32 of the item 5 on the evidence list)
- Information **on reform of the Aliens Act**

- Customer bulletin for employees and employers about the changes in the Aliens' Act in Migri webpage (page 34 of the item 5 on the evidence list).
- Media release about the changes in the Aliens Act in Migri website (page 36 of the item 5 on the evidence list).
- Webinar for employees and employers about the changes in the Aliens act (page 38 of the item 5 on the evidence list).
- Customer bulletin for employers about the improvements in Enter Finland for employers in Migri website (page 38 of the item 5 on the evidence list).

This check was completed successfully, confirming that the customer guidance and communications were satisfactorily undertaken.

- **usability, performance and automation**

The Commission services conducted an on-the-spot check on 26 November, 2 December and 16 December 2025 to verify usability, performance and automation features. The checks related to functionality related to making the application process easier for the applicants and to automation improving performance. This check was completed successfully confirming the functionalities introduced in Enter Finland described under Chapter 7, Section vi) of the Report by the Finnish Immigration Service – P3C1R3 (item 3 on the evidence list)

- Screenshots in section vi, chapter 1 in the Screenshots I document (item 4 on the evidence list) demonstrates EnterFinland application model designed with questions guiding the filling in of the application. On-the-spot checks demonstrated the application form with the guiding questions, thus illustrating the usability. Page 18 of item 6 on the evidence list (Hankesalkku status report) refers to this upcoming functionality.
- Screenshots in section vi, chapter 2 of the Screenshots I document (item 4 on the evidence list) demonstrates automatic initiation of work based extended permits in the UMA system, when the applicant submits an application for an extended permit in EnterFinland, thus demonstrating automation and performance. The on-the-spot checks demonstrated that once the payment for the extended permit has been filled and paid in EnterFinland, the application receives a diary number, and the decision process is automatically activated in UMA, unless a physical verification will be required in the Migri service point. In the latter case the customer agent will prompt the initiation after the physical verification has taken place. Page 3 of item 6 on the evidence list (Hankesalkku status report) refers to introduction of this functionality.

The on-the-spot checks confirmed the usability of the system with guiding questions, automation through automatic initiation of work based extended permits and performance on the basis of automation and guiding questions. Also, the increased amount of information collected in the application phase decreases the need for requests for additional information, and the automatic data transfer between different authorities' systems and automatic screening of data allows better performance of the immigration services. On this basis, the Commission confirmed that the data provided matched the evidence submitted by the Member State for demonstrating the specific requirement as set out in the Council Implementing Decision.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 89 - Work ability teams for the provision of Work Ability Programme offered in new municipalities and the Individual Placement and Support model service offered in new welfare areas

Related Measure: P3C1I1 Employment and labour market – Work ability, productivity and well-being at work

Qualitative Indicator: Work ability teams for the provision of Work Ability Programme offered in new municipalities and the Individual Placement and Support model service offered in new welfare areas

Time: Q4 2024

1. Context:

The objective of the investment is to increase the participation in the labour market of people with partial work ability. The investment consists of an extension of the Work Ability programme to new municipalities and the Individual Placement and Support (IPS) Model to new welfare areas, and an increase in the number of workplaces or occupational healthcare units participating in measures supporting work ability.

Milestone 89 concerns the extension of the Work Ability Programme to five new municipalities, and the Individual Placement and Support model to six new welfare areas.

Milestone 89 is the first step of the implementation of the investment. It is assessed in parallel with target 90, which is related to increasing the number of workplaces and occupational healthcare units participating in mental health and work ability promotion measures.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.	
2	Websites where the work ability service is described and offered	Websites where the work ability service is described and offered (Raisio, Rusko, Naantali, Loimaa and Aura). Available online: https://www.varha.fi/fi/palvelut/tyokyvyn-tuen-palvelut (checked 27 Jan 2026) https://www.varha.fi/fi/asiointikanavat/tyokykykoordinaattori-raisio-rusko-naantali-ja-vakka-suomi (checked 27 Jan 2026) https://www.varha.fi/fi/asiointikanavat/tyokykyko

		ordinaattori-lieto-koski-tl-marttila-loimaa-oripaa-aura-poytya (checked 27 Jan 2026)
3	Application guidelines	Application guidelines can be found in project guide for the Ministry of Social Affairs and Health's second call for government grant applications for years 2023-2025. Available online: https://julkaisut.valtioneuvosto.fi/server/api/core/bitstreams/e755177d-dc40-4972-ba7f-268d18bffb2b/content
4	Final project reports	Final project reports for the Work Ability programme and Individual Placement and Support (IPS) model, produced by the wellbeing services counties (WSCs). In accordance with the government decision conditions, reporting was a prerequisite for the disbursement of the grant (item 7) as also required under the Act on Discretionary Go vernment Grants (688/2001). Page where the final report of each welfare area can be found: Northern Savo, 27 Aug 2025, starting from p. 16; Central Finland, 17 Feb 2025, p. 40; Ostrobothnia, 10 Feb 2025, p. 57; Southwest Finland (incl. the five new municipalities using work ability teams), 28 Feb 2025, p. 98; Central Ostrobothnia, 20 Feb 2025, p. 107; Kainuu, 28 Feb 2025, p. 125
5	Website where the definition of the IPS concept is provided	The provided link shows the definition of the concept of Individual Placement and Support (IPS) model. Available online: https://thl.fi/aiheet/hyvinvoinnin-ja-terveyden-edistamisen-johtaminen/osallisuuden-edistaminen/tyoelamaosallisuus/ips-tyohonvalmennus
6	Website of the Finnish Institute of Health and Wellbeing (THL) on the IPS development programmes	The website describes the IPS development programmes and lists the WSCs/regions that have taken part during different programme periods. Available also online: https://thl.fi/tutkimus-ja-

		kehittaminen/tutkimukset-ja-hankkeet/ips-sijoita-ja-valmenna-kehittamishanke (checked 27 Jan)
7	Government grant decisions	This document includes all the grant decisions of the welfare areas that extended either the Work Ability programme or the IPS model and mentions the reporting as a condition for funding.
8	Work Ability Programme Report by the Finnish Institute of Health and wellbeing	Report on the Work Ability Programme including a list of six joint municipalities that are newly involved in the Work Ability Programme, compared to the 22 municipalities or joint municipalities involved in previous programme period.
9	Final report of the first programme period of work ability programme in Southwest Finland, 2019-2023	Final reports of the first programme period of work ability programme, in Southwest Finland, 2019-2023, including the baseline municipalities participating. Available online: https://www.innokyla.fi/sites/default/files/2022-12/Kaveria_ei_jateta_loppuraportti_0.pdf).
10	IPS evaluation report by the Finnish Institute of Health and wellbeing, 2024	Evaluation report on the IPS programme (2020-2023) by the Finnish Institute of Health and wellbeing (THL), published in 2024, including a list of baseline regions participating in the programme during the first programme period. Available online: https://www.julkari.fi/server/api/core/bitstreams/be9e69e9-bf4c-460f-bafa-671afdf240d2/content
11	Websites where the IPS service is offered	1. Central Finland: https://www.hyvaks.fi/palvelumme/mielenterveys-ja-paihdepalvelut/tyohonvalmennus-ips (further instructions to job-seekers: https://www.hyvaks.fi/palvelumme/mielenterveys-ja-paihdepalvelut/tyohonvalmennus-ips/tyonhakijalle) 2. Central Ostrobothnia: https://soite.fi/palvelut-ja-yhteys/mielenterveys-ja-paihdepalvelut/aikuisten-mielenterveyspalvelut/ips/ 3. Northern Savo: https://pshyvinvointialue.fi/sijoitajavalmenna 4. Kainuu: https://hyvinvointialue.kainuu.fi/tyollistymisen-ips-toimintamalli-osana-mielenterveyspalveluita 5. Southwest Finland: https://hyvinvointialue.kainuu.fi/tyollistymisen-ips-toimintamalli-osana-mielenterveyspalveluita 6. Ostrobothnia: https://pohjanmaanhyvinvointi.fi/ips-

		toimintamalli-otetaan-kayttoon-pohjanmaan-hyvinvointialueella-1-6-2026-alkaen/ 7. Northern Ostrobothnia: https://pohde.fi/tietoa-meista/kehittaminen-ja-innovaatiot/kehittamishankkeet/muut-hankkeet/terveydeksi-kansallinen-terveys-ja-hyvinvointiohjelma/sijoita-ja-valmenna/ (further information for job-seekers: https://pohde.fi/wp-content/uploads/2025/12/IPS-esite_Pohde_Asiakas_saavutettava_korj.pdf) (Links checked 24 March 2026)
12	Activity and budget plan 2026-2028 of Ostrobothnia wellbeing service county (WSC)	The activity and budget plan including a mention of implementation of IPS service in the WSC in 2026.
13	Meeting minutes of the Ostrobothnia WSC Council meetings, 17 November 2025 and 1 December 2025	Meeting minutes of the Ostrobothnia WSC Council meeting, including a decision on the approval of the Activity and budget plan for 2026-2028.
14	Government grant decision awarding Northern Ostrobothnia a grant for IPS model, 16 June 2025	Grant decision awarding Northen Ostrobothnia WSC funding for IPS model programme for 1 May 2025-31 March 2027.

3. Analysis:

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

Work ability teams for the provision of the Work Ability Programme shall be offered in five new municipalities, […]

The Work Ability Programme was extended to five new municipal authorities (items 2 and 4 on the list of evidence) in Southwest Finland (*Varsinais-Suomi, 'Varha'*) wellbeing service county (WSC), which were previously not involved in the programme. The work ability teams for the provision of the Work Ability Programme offered in Southwest Finland WSC are described in evidence item 2 (websites where the service is described and offered, p. 4) and evidence 4 (final project reports by the WSCs).

As described in item 2, work ability teams offer multidisciplinary support to clients whose situation require it. They prepare work capacity plans, e.g. by referring the client to medical or vocational rehabilitation and agree on different professionals' roles in cases and ensure that the measures are progressing according to the plan. The teams consist of different experts, and may include, for example, work ability coordinators, representatives from the social services, representatives from the public employment services, psychologists and physiotherapists. As described in item 4, p. 101, work ability coordinators founded work ability teams in Aura, Loimaa, Naantali, Raisio and Rusko.

Municipalities Raisio, Rusko, Naantali, Loimaa and Aura are using work ability teams. For Raisio, Rusko and Naantali, p. 8 of evidence item 2 (websites where the service is described and offered), and for Loimaa and Aura, p. 10 of evidence item 2 demonstrate that the services are offered in these municipalities. As described in item 4, p. 101, work ability coordinators established work ability teams in Aura, Loimaa, Naantali, Raisio and Rusko, and item 2 (p. 8, 10) includes contact details and opening hours of the work ability coordinator.

The Commission services accessed the links provided by the authorities in item 2 on 27 January 2026 to verify that the website was available online, and the features of the platform corresponded

to the screenshots transmitted as evidence in item 2. This check was completed successfully, confirming that the website is accessible online and that work ability teams for the provision of the Work Ability Programme are offered.

In addition, p. 101 of final project reports by the WSCs (item 4) describes the expansion of the work ability programme and p. 6-7 of the report by THL (item 8) lists all the 22 municipalities and joint municipalities that took part in the programme during its previous programme period (2019-2023). Together with the reports from the first programme period of work ability programmes (2019-2023), the final report of Southwest Finland, Turku municipality in particular, demonstrating that Turku, Lieto, Laitila and Uusikaupunki attended the programme previously, this shows that work ability teams were introduced in these five municipalities for the first time.

[…] and the Individual Placement and Support model service shall be offered in six new welfare areas.

The Individual Placement and Support (hereinafter referred as IPS) model was extended to seven new wellbeing services counties (WSCs). This is demonstrated by evidence items 4 (final reports by WSCs), item 6 (website of the Institute of Wellbeing and Health), item 11 (websites of the IPS services in the WSCs), and item 14 (grant decision).

As described in item 5 (website of the IPS model), the IPS model includes job coaching where the client is supported by a coach and their own psychiatric care provider. With the help of a job coach, the client searches for a job that matches the client's skills, resources and interests, aiming at getting employed in the open labour market.

Evidence item 11 demonstrates that for the seven WSC, **websites are online** and include a **information or a link to the information on how to access the IPS model**. The Commission services accessed the web links provided by the authorities in item 11 on 24 March 2026 to verify that the websites were available online, and the features of the platform corresponded to the screenshots transmitted as evidence in item 11. These checks were completed successfully, confirming that the websites are accessible online and include a link to the information on how to access the IPS model.

For one of the seven (Ostrobothnia) WSCs, the website includes information explaining that the IPS service is temporarily paused after the development programme; however, it will be continued as from June 2026, as also shown in items 11 (p. 6), 12 (p. 8, Activity and Budget Plan 2026-2028) and 13 (p. 9, meeting minutes of the WSC meeting where the Activity and Budget Plan was approved).

For six WSCs, Finland provided the final reports of the IPS development programmes (item 4). Item 4 describes how the IPS model was introduced in Kainuu (p. 128), in Central Ostrobothnia (*Keski-Pohjanmaa*) (p. 110), in Central Finland (*Keski-Suomi*) (p. 44), in Ostrobothnia (*Pohjanmaa*) (p. 66-68), in Northern Savo (*Pohjois-Savo*) (p. 30-31), and in Southwest Finland (*Varsinais-Suomi*) (p. 103). For one WSC (Northern Ostrobothnia, *Pohjois-Pohjanmaa,* which is currently offering the IPS model, as demonstrated in item 11 (p. 7)), Finland also provided item 14 (government grant decision), demonstrating that Northern Ostrobothnia was awarded government grants to implement the IPS programme.

All seven WSCs are **new** to the IPS programme. On p. 2 of item 6 (website of the Finnish Institute for Health and Welfare), the WSCs participating in the IPS development programme during different programme periods are listed. In 2023-2024, following six new WSCs participated in the programme: Central Finland, Central Ostrobothnia, Southwest Finland, Northern Savo, Ostrobothnia and Kainuu*;* and Northern Ostrobothnia is participating in 2025-2027. Compared to the list of organisations participating in the previous programme period from 2020 to 2023, also shown in item 6 as well as

item 10 (Evaluation report of the IPS model 2020-2023), the seven aforementioned WSCs were new to the IPS programme. During the first programme period (2020-2023), following organisations participated: North Karelia joint municipal authority for social and health services, Siun sote; Psychiatry and substance abuse services of the social and health department of the City of Helsinki; HUS Psychiatry and Uusimaa TE Office; South Ostrobothnia Hospital District; and Lapland Hospital District. Together with the section 2.2. of the evaluation report on the IPS programme (2020-2023) (item 10) by the Finnish Institute of Health and Wellbeing listing the organisations participating in the previous programme period, the evidence shows that IPS model was introduced in the abovementioned seven (Central Finland, Central Ostrobothnia, Southwest Finland, Northern Savo, Ostrobothnia, Kainuu and Northern Ostrobothnia) WSCs for the first time.

The Commission services accessed the links provided by the authorities in item 6 on 27 January 2026 to verify that the website was available online, and the features of the platform corresponded to the screenshots transmitted as evidence in items 6. These checks were completed successfully, confirming that the website is accessible online and that the Individual Placement and Support model service is being offered in the abovementioned seven new welfare areas.

4. Commission Preliminary Assessment: satisfactorily fulfilled.

Number and name of the Target: 90 - Number of workplaces or occupational health care units having participated in work ability promotion measures

Related Measure: P3C1I1 - Employment and labour market – Work ability, productivity and well-being at work

Quantitative Indicator: Number

Baseline: 0

Target: 2,000

Time: Q3 2025

1. Context:

The objective of the investment is to increase the participation in the labour market of people with partial work ability. The investment consists of an extension of the Work Ability programme to new municipalities and the Individual Placement and Support Model to new welfare areas, and an increase in the number of workplaces or occupational healthcare units participating in work ability promotion measures.

Target 90 concerns at least 2 000 workplaces or occupational healthcare units having participated in work ability promotion measures.

Target 90 is the second and last target of the investment, and it has been implemented in parallel with the milestone 89, which refers to the offer of Work ability teams for the provision of the Work Ability Programme in new municipalities and the offer of Individual Placement and Support model service in new welfare areas.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.	
2	List of 3,227 workplaces and occupational healthcare units	A list provided by the implementing authority of workplaces and occupational health care units that have participated in measures supporting mental health and work ability. The list contains the workplaces attending events of the two programmes organised by the Finnish Institute of Occupational Health (TTL) and Keva.
3	Call for applications for work ability promotion programmes, 7 June 2022	Call for applications by the Ministry of Finance describing the objectives of the work ability promotion measures
4	Contract, Part 1: Means and Methods of Mental Health Support and Support for Different Professional Sectors, signed on 27	Contract between the Ministry of Social Affairs and Health and the Finnish Institute of Occupational Health (TTL) on the implementation of the Means and Methods of Mental Health Support and Support for

	April 2023.	Different Professional Sectors Project, part 1. Contract duration: 16.1.2023-31.3.2025.
5	Contract, Part 2: Means and Methods of Mental Health Support and Support for Different Professional Sectors, signed on 30 September 2024.	Contract between the Ministry of Social Affairs and Health and TTL on the extension of the implementation of the Means and Methods of Mental Health Support and Support for Different Professional Sectors Project, part 2. Contract duration: 16.1.2023-30.4.2026.
6	Ministry of Finance decision on granting government grant to public sector work ability project, 30 June 2022.	Decision of the Ministry of Finance on the government grant to Keva for a project (Sustainable Working Life) to promote and support the work ability of public sector employees.
7	Screenshots of attendance forms for 60 sample units	Screenshots of online attendance forms in the online systems of Keva and TTL.
8	Screenshots of Keva event information	Screenshots of Keva event information complementing the attendance forms.

3. Analysis:

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

At least 2,000 workplaces or occupational healthcare units shall participate in work ability promotion measures.

Evidence items 4, 5 and 6 (contracts between the implementing authorities and the organisations) show that Keva (the public sector pensions organisation) and the Institute for Occupational Health (TTL) were selected to organise the work ability promotion measures. Per section 1 of the call for applications (item 3), the main objective of the targeted measures is to promote the wellbeing and work ability of the employees in the public sector, as well as supporting mental health at workplaces, producing new academic data on the work ability risks and their impacts as well as developing new collaboration forms, networks and digital services to manage work ability and to support career services in public sector.

- Items 4 and 5 are contracts between TTL and Ministry of Social Affairs and Health and cover the implementation of the Means and Methods of Mental Health Support and Support for Different Professional Sectors Project. Per section 3 of the contract (item 4), the programme promotes the readiness of workplaces to strengthen and support mental health as part of work ability based on academic evidence.
- Item 6 is the decision by the Ministry of Finance awarding Keva a grant to organise the Sustainable Working Life programme. Per section 3 of the decision (item 6), the grant was awarded to Keva work ability programme aiming to promote work ability and decrease the costs of disabilities in public sector.

The list of workplaces or occupational health units (evidence 2) details that 3,227 workplaces or occupational healthcare units participated in work ability promotion measures organised by Keva or TTL.

Following the selection of a random sample of 60 units, Finland submitted copies of attendance forms of employees in different workplaces or occupational healthcare units (evidence 7) specifying that the workplaces or occupational healthcare units participated in work ability promotion measures organised as part of Keva or TTL programmes (Means and Methods of Mental Health

Support and Support for Different Professional Sectors Project and Sustainable Working Life programme). The evidence provided for a sample of 60 units confirmed that the requirement of the target has been met, thus exceeding the goal of Target 90 by 1,227.

On 5 February 2026, the Commission services conducted an on-the-spot check on the online participation forms to verify the sampled data against the information provided in the full list of workplaces or occupational health units (item 2). This check was completed successfully, confirming that at least 2,000 workplaces participated in work ability promotion measures organised by TTL and Keva. The Commission services conducted an on-the-spot check on 4 March 2026 to verify evidence item 8, i.e. the event information of Keva events. This check was completed successfully, confirming the event information in the system.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 95 – Number of participants in further training in career guidance

Related Measure: P3C2R1 – Reform of continuous learning

Quantitative Indicator: Number

Baseline: 0

Target: 300

Time: Q4 2024

1. Context:

The objective of this reform is to support continuous learning. The measure consists of: (i) creating a service centre for continuous learning and employment to promote the reform's implementation; (ii) creating a system for anticipating labour and competence needs; (iii) carrying out training programmes which support the digital transition, the understanding of new ways of working, as well as a just transition to a carbon-neutral society; and (iv) carrying out training for career guidance services.

Target 95 is related to point (iv) of the above, and concerns the provision of further specialised training related to the digital skills of instructors, language and cultural awareness, the green transition and the promotion of gender equality of at least 300 participants in order to develop the expertise of career guidance professionals.

Target 95 is the fourth target of the reform, and it follows the completion of milestone 91 concerning the entry into force of the Act on the Service Centre for Continuous Learning and Employment, milestone 93 on the publication of the first call for applications to provide training to respond to changes in working life, including digitalisation and the green transition, and milestone 92 related to the completion of a medium-term foresight model for labour and competence needs. It will be followed by target 94, related to carrying out training programmes which support the digital transition, the understanding of new ways of working, as well as a just transition to a carbon-neutral society. The reform has a final expected date for implementation in 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	List of trained participants	List containing the certified participants to the different categories of training under this target.
3	Contract KEHA/18958/2022	Contract between the KEHA Centre, the contractor, and the Jyväskylä University of Applied Sciences, acting as supplier, for further training in the field of career guidance
4	60 Training Certificates signed between 11 November 2023 and 12 December 2024	In the context of the sampling analysis, training certificates were provided for the sampled list of 60 trained participants. These certificates are signed by the Jyväskylä University of Applied

		Sciences for courses in Finnish, and by the Abo Akademi for one certificate in Swedish, in association with the Keha centre and Jyväskylä University of Applied Sciences.

3. Analysis:

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

At least 300 persons shall receive further training in career guidance, […]

The list of trained participants (evidence 2) details that 304 participants received further training in career guidance. The training is addressed at career guidance professionals, to further develop their expertise in career guidance services in different areas of specialisation.

The evidence provided for a sample of 60 units (evidence 4) confirmed that further training in career guidance has been provided. The certificates awarded to participants (evidence 4) specified that the training was provided in order to continuously train participants in career guidance, with different specialisations as explained below.

Training certificates (evidence 4) are issued in accordance with Contract KEHA/18958/2022 (evidence 3) between the KEHA Centre, the contractor, and the Jyväskylä University of Applied Sciences, acting as supplier, for further training in the field of career guidance. This contract sets out the framework under which the trainings are provided. The contract specifies in clause 4 (page 3, evidence 3), the target of reaching at least 300 career guidance professionals to provide them with further training by end of 2024. In addition, the contract designates in clause 8 (page 3, evidence 3) Abo Akademi as its subcontractor, which certifies the trainings provided in Swedish.

[…] specialised in either one of the following: the digital skills of instructors, language and cultural awareness, the green transition or the promotion of gender equality.

Following the selection of a random sample of 60 units, Finland submitted training certificates signed by the Jyväskylä University of Applied Sciences for courses in Finnish, and by the Abo Akademi for one certificate in Swedish, in association with the Keha centre and Jyväskylä University of Applied Sciences, to demonstrate the training received in career guidance. The evidence provided for a sample of 60 units (evidence 4) confirmed that the training was provided in one of the categories required by the milestone description. From the list of 304 unique certified participants provided (evidence 2), 111 were certified in (i) digital skills of instructors, (ii) 80 in the green transition and 113 in (iii) promotion of gender equality.

Furthermore, in line with the description of the measure, **this measure consists of […] (iv) carrying out training for career guidance services.**

The list of trained participants (evidence 2) details that 304 participants received further training in career guidance.

The evidence provided for a sample of 60 units (evidence 4) confirmed that further training in career guidance had been provided. The certificates awarded to participants specified that the training was provided in order to continuously train participants in career guidance.

4. Commission Preliminary Assessment: Satisfactorily fulfilled**.**

Number and name of the Milestone: 128 – Publication of additional calls for applications

Related Measure: P3C4I3 - Strengthening competitiveness and boosting growth in crisis-impacted sectors – Support for the renewal of the cultural and creative sectors

Qualitative Indicator: Publication of additional calls for applications

Time: Q4-2024

1. Context:

Milestone 128 is part of investment P3C4I3, which has the objective of supporting the growth of the cultural and creative sector as strong potential drivers for future economic growth. The investment consists in providing grant support to entities operating in the cultural and creative sectors.

Milestone 128 requires the publication by Business Finland and the Ministry of Education and Culture of any remaining calls for applications with the aim to revitalise, grow, and internationalise the creative industries with an emphasis on digital transformation and innovation. These calls for applications should be additional to, and they should follow the same eligibility criteria as the calls for applications under milestone 127, in particular as regards the requirement to promote the digitalisation of business and the compliance with the 'Do no significant harm' principle and the compliance with the relevant EU and national environmental legislation.

Milestone 128 is the second milestone of the investment, and it follows the completion of milestone 127, related to the publication of two calls for applications for projects supporting the renewal of cultural and creative sectors. It is accompanied by target 129 in this payment request, on the submission of the reports relating to projects which received support under this measure. Target 129 is the last milestone or target of the measure.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary Document duly justifying how the milestone (including all the constitutive elements) are satisfactorily fulfilled.	
2	Copy of the terms of reference (applications instructions) published by Business Finland on 6 March 2022.	Copy of the terms of reference (applications instructions) published by Business Finland on 4 April 2022 and open until 30 September 2022
3	Copy of the terms of reference (applications instructions) published by Business Finland on 4 April 2023.	Copy of the terms of reference (applications instructions) published by Business Finland on 6 March 2023 and open until 29 September 2023.
4	Copy of the call for applications by the Ministry of Education and Culture 2022	Copy of the call for applications, including application instructions, by the Ministry of Education and Culture 2022, targeted to the culture and creative industries with the application period from 10 June 2022 to 31

		August 2022
5	Copy of the call for applications by the Ministry of Education and Culture 2023	Copy of the call for applications, including application instructions, by the Ministry of Education and Culture 2023, targeted to the culture and creative industries with the application period from 13 February 2023 to 12 April 2023
6	Copy of the call for applications by the Ministry of Education and Culture 2024	Copy of the call for applications, including application instructions, by the Ministry of Education and Culture 2024, targeted to the culture and creative industries with the application period from 27 November 2023 to 31 January 2024
7	Compulsory annex on the DNSH principle for the Ministry of Education and Culture applications	A compulsory annex to the application under this measure giving assurance as regards the compliance with the DNSH principle used in the calls by the Ministry of Education and Culture

3. Analysis:

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

Publication of additional calls for applications in line with the eligibility/selection criteria referred to in milestone 127.
Furthermore, in line with the description of the measure, **the investment consists of providing grants to entities operating in the cultural and creative sectors**.

Milestone 127 required that the calls for applications under milestone 128 i) shall be launched with the aim to revitalise, grow, and internationalise the creative industries, with emphasis on the digital transformation and innovation; ii) that the eligibility/selection criteria shall ensure that the intervention focuses on promoting elements directly linked to the digitalisation of business (according to intervention field 015 in Annex VII to the RRF Regulation); and iii) that the eligibility criteria shall also 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.

A total of seven calls were launched under this measure. The selection and eligibility criteria for the first two calls (one by Business Finland and one by the Ministry of Education and Culture) were assessed in Milestone 127 under Finland's first payment request.

Finland has provided corresponding evidence of the publication of the calls in line with the eligibility/selection criteria indicated in Milestone 127. Business Finland published 2 additional calls on their website, and the Ministry of Education and Culture published three additional calls on their website and that were not already assessed under Milestone 127 as follows:

i. **Publication of the second call by Business Finland** targeted to creative industries was open from 04 April 2022 to 30 September 2022 (evidence 2).

   Section 2 of the call for application (p. 2) provides that "The aim is to **increase the research, development and innovation (R&D&I)** of the **creative economy** in the long term and

strengthen cooperation between creative economy companies and research organisations, thereby promoting the **renewal of the creative economy**." Furthermore, Section 2 stipulates that "funding will be targeted in particular at projects that **renew companies' digital operating environments** and promote the green transition." In addition, section 3.1 (p. 4) requires that "the recipient of funding must have the prerequisites for profitable business and **growth**."

Section 2.1 (p. 2-3) provides that "the funded projects are not limited to any specific technology or business area, but each of them **must include an element that significantly promotes digitalisation development** in accordance with Finland's Sustainable Growth Programme. The results to be achieved must aim at the development and application of **new digital solutions in relation to the current practices** of the Finnish creative industries." Furthermore, Annex 1 of the call (p. 9) specifies that "the projects to be financed must meet the criteria for **promoting digital transformation** set out in Annex VII, Measure 015 of Regulation (EU) 2021/241 establishing the Recovery and Resilience Facility."

Section 2.1 of the call for applications provides that the "Each project financed under Finland's Sustainable Growth Programme will have to fulfil **the DNSH criteria** (p. 3). Annex 1 of the call for applications further specifies that selected "projects must comply with **relevant binding EU and national environmental regulations** (p. 9). Projects to be funded must meet the selection and eligibility criteria set out in the Technical Guidance Document 2021/C58/01 on the Do No Significant Harm principle." Annex 1 also provides **the DNSH exclusion list with footnotes** and stipulates that projects that do not comply with the list cannot be funded.

ii. **Publication of the third call by the Business Finland** targeted to the creative industries was open from 06 March 2023 to 29 September2023 (evidence 3).

Section 2 of the calls for application (p. 2) provides that "The aim is to **increase the research, development and innovation (R&D&I) intensity** of the creative economy in the long term and strengthen cooperation between creative economy companies and research organisations, thereby promoting the renewal of the creative economy." Furthermore, Section 2 stipulates that "funding shall be targeted in particular at projects that renew companies' digital operating environments and promote the green transition." In addition, section 5.3 (p. 6) requires that "the recipient of funding must have the prerequisites for profitable business and growth."

Section 2.1 (p. 3) provides that "the projects to be funded are not limited to any specific technology or business area, but each of them must include **an element that significantly promotes digitalisation** in accordance with Finland's sustainable growth programme. The results to be achieved shall be aimed at the development and application of new digital solutions compared to current practices in Finland's creative industries. The aim of the projects shall be to contribute to the support of digital practices and promoting the use of technology in creative industries. The intervention shall target the promotion of elements related to **the digitalisation of enterprises**." These provisions are in accordance with the intervention field 015 in Annex VII to the RRF Regulation.

Section 2.1 of the call for applications provides that the "Each project financed under Finland's Sustainable Growth Programme will have to fulfil **the DNSH criteria**" (p. 4). Annex 1 further specifies that selected "projects must comply with **relevant binding EU and national environmental regulations** (p. 10). Projects to be funded must meet the selection and

eligibility criteria set out in the Technical Guidance Document 2021/C58/01 on the Do No Significant Harm principle." Annex 1 also provides **the DNSH exclusion list with footnotes** and stipulates that projects that do not comply with the list cannot be funded.

iii. **Publication of the second call by the Ministry of Education and Culture** targeted to the culture and creative industries was open from 10 June 2022 to 31 August 2022 (evidence 4).

Under sub-heading "For what and for whom is the grant intended?", the call for applications (p. 2) state that: "**Structural support for the cultural and creative sectors (grant)** is intended to develop innovative services, as well as production and business models. Companies and bodies with legal capacity (including associations, foundations, and cooperatives) active in the arts and culture sectors, as well as municipalities and associations of municipalities can apply for the grant."

The call for application document provides under the heading "Objective of the grant" (p.3) that the support aims at "**accelerating innovative and research-based renewal**, recovery and **sustainable growth** in the sectors most affected by the crisis: tourism, **the creative economy and the events industry**." In addition, it is stated that "the purpose of structural support is to encourage cultural and creative sector operators to **revive and renew** their sectors and to **strengthen growth and international competitiveness** (…)." Furthermore, the section provides that "the aim of structural support is to **develop and introduce innovative services, production and operating models** that respond to the challenges of the operating environment and strengthen the future of the sectors (…)."

Furthermore, under sub-heading "Objective of the grant" (p. 3) the call for application specifies that "Structural aid also aims at **strengthening internationalisation and promoting the digital transition of cultural and creative ecosystems**. Structural support shall support actions that contribute to the **digital transformation of business**." This is further substantiated under sub-heading "Criteria for grants", point C) Criteria for digitalisation (p.5), where it is provided that "impact of project outputs on the development of the digital transformation of the business" shall be taken into account in the assessment of the application. These provisions are in accordance with intervention field 015 in Annex VII to the RRF Regulation.

The call for applications under sub-heading "For what and for whom is the grant intended?" stipulates that projects that do not comply with **the DNSH principle** shall not be eligible for funding (p. 2). Applicants are required to fill as a compulsory annex to their application a templated document (evidence 7) which replicates the DNSH exclusion list with footnotes. The template provides that the selected projects must comply with **relevant binding EU and national environmental regulations**, and that they cannot contain projects that fall under **the DNSH exclusion list**.

iv. **Publication of the third call by the Ministry of Education and Culture** targeted to the culture and creative industries was open from 13 February 2023 to 12 April 2023 (evidence 5).

Under sub-heading "For what and for whom is the grant intended?", the call for applications (p. 2) states that: "**Structural support for the cultural and creative sectors (grant)** is intended to **develop innovative services, as well as production and business models**. Companies and bodies with legal capacity (including associations, foundations, and

cooperatives) active in the arts and culture sectors, as well as municipalities and associations of municipalities can apply for the grant."

The call for application document provides under the heading "Objective of the grant" (p.3) that the support aims at "**accelerating innovative and research-based renewal**, recovery and **sustainable growth** in the sectors most affected by the crisis: tourism, **the creative economy and the events industry**." In addition, it is stated that "the purpose of structural support is to encourage cultural and creative sector operators to **revive and renew** their sectors and to **strengthen growth and international competitiveness** (…)." Furthermore, the section provides that "the aim of structural support is to **develop and introduce innovative services, production and operating models** that respond to the challenges of the operating environment and strengthen the future of the sectors (…)."

Furthermore, under heading "Objective of the grant" (p. 3) the call for application specifies that "Structural aid also aims at **strengthening internationalisation** and **promoting the digital transition** of cultural and creative ecosystems. Structural support supports actions that contribute to the **digital transformation of business**." This is further substantiated under sub-heading "Criteria for grants", point C) Criteria for digitalisation (p.5), where it is provided that "impact of project outputs on the development of the digital transformation of the business" shall be taken into account in the assessment of the application. These provisions are in accordance with intervention field 015 in Annex VII to the RRF Regulation.

The call for applications under sub-heading "DNSH principle" stipulates that projects that do not comply with **the DNSH principle** shall not be eligible for funding (p. 2). Applicants are required to fill as a compulsory annex to their application a templated document (evidence 7) which replicates **the DNSH exclusion list with footnotes**. The template provides that the selected projects must comply with **relevant binding EU and national environmental regulations**, and that they cannot contain projects that fall under the DNSH exclusion list.

v. **Publication of the fourth call by the Ministry of Education and Culture** targeted to the culture and creative industries was open from 27 November 2023 to 31 January 2024 (evidence 6).

Under sub-heading "For what and for whom is the grant intended?", the call for applications (p. 2, evidence 6) states that: "**Structural support for the cultural and creative sectors (grant) is intended to develop innovative services, as well as production and business models**. Companies and bodies with legal capacity (including associations, foundations, and cooperatives) active in the arts and culture sectors, as well as municipalities and associations of municipalities can apply for the grant."

The call for application document provides under the heading "Objective of the grant" (p.3) that the support aims at "**accelerating innovative and research-based renewal**, recovery and **sustainable growth** in the sectors most affected by the crisis: tourism, **the creative economy and the events industry**." In addition, it is stated that "the purpose of structural support is to encourage cultural and creative sector operators to **revive and renew** their sectors and to **strengthen growth and international competitiveness** (…)." Furthermore, the section provides that "the aim of structural support is to **develop and introduce innovative services, production and operating models** that respond to the challenges of the operating environment and strengthen the future of the sectors (…)."

Furthermore, under heading “Objective of the grant” (p. 3) the calls for application specify that “Structural aid also aims at **strengthening internationalisation** and **promoting the digital transition** of cultural and creative ecosystems. Structural support supports actions that **contribute to the digital transformation of business**.” This is further substantiated under sub-heading “Criteria for grants”, point C) Criteria for digitalisation (p.6), where it is provided that “impact of project outputs on the **development of the digital transformation of the business**” will be taken into account in the assessment of the application. These provisions are in accordance with intervention field 015 in Annex VII to the RRF Regulation.

The call for applications under sub-heading “DNSH principle” stipulates that projects that do not comply with **the DNSH principle** shall not be eligible for funding (p. 3). Applicants are required to fill as a compulsory annex to their application a templated document (evidence 7) which replicates **the DNSH exclusion list with footnotes**. The template provides that the selected projects must comply with **relevant binding EU and national environmental regulations**, and that they cannot contain projects that fall under the DNSH exclusion list.

4. Commission Preliminary Assessment: Satisfactorily Fulfilled.

Number and name of the Target: 129 - Project reports submitted

Related Measure: P3C4I3 - Strengthening competitiveness and boosting growth in crisis-impacted sectors – Support for the renewal of the cultural and creative sectors

Quantitative Indicator: Number

Baseline: 0

Target: 131

Time: Q4-2025

1. Context:

Target 129 is part of the investment P3C4I3, which has the objective of supporting the growth of the cultural and creative sector as strong potential drivers for future economic growth. The investment consists in providing grant support to entities operating in the cultural and creative sectors.

Target 129 is related to the submission of reports by beneficiaries who received financial support under this measure towards their projects. This reporting takes place after the project has been finalised.

Target 129 is the third and last milestone or target of the investment P3C4I3, and it follows the completion of milestone 127 of the first payment request and it is accompanied by milestone 128 in this payment request. Both milestones 127 and 128 related to the publication of calls for applications for support under this measure.

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	List of supported projects	A list of projects for which project report has been submitted and which received support under this measure from the Ministry of Education and Culture and Business Finland
3	60 project reports submitted between 1 April 2022 and 28 November 2025.	In the context of the sampling analysis, project reports were provided for the sampled list of 60 recipient entities. As a rule, these project reports were submitted by the representatives of the recipient entities through the Ministry of Education and Culture or Business Finland electronic grant system using a specific document template. In case of projects supported by Business Finland, project reports were accompanied by funding memos.

3. Analysis:

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

At least 131 project reports shall be submitted by recipient entities for projects supported under the calls for applications referred to in this measure.

The authorities explain in the summary document that the reporting obligation for recipient entities is based on the Act of Discretionary Government Grants (Valtionavustuslaki 688/2001). According to Sections 11, 12 and 13 of Act 688/2001, the recipient entity is required to submit a 'report'. Based on this provision the Ministry of Education and Culture and Business Finland have specified in their respective funding terms and conditions and, subsequently, in each funding decision that 'report' refers to a project report, which will have to be submitted at the end of the period of use of the grant.

The list of supported projects (evidence 2) shows that in total 181 project reports were submitted by recipient entities.

Following the selection of a random sample of 60 units, Finland submitted project reports that were submitted by recipient entities to the Ministry of Education and Culture and Business Finland between 1 April 2022 and 28 November 2025 (evidence 3). In case of projects supported by Business Finland funding memos related to supported projects were also submitted. As regards the project reports submitted under the Ministry of Education and Culture calls, the project reports show in section 'Approval' that the report has been prepared and validated by the representative of the entity and the submission date is generated automatically by the system when the report is submitted. As regards the project reports submitted under the Business Finland calls, the project reports show in section 'Submission' that the report has been prepared and validated by a representative of the entity, and the submission date is generated automatically by the IT system when the report is submitted. Thereby the submission of the project reports to the authorities is confirmed.

The project reports submitted to the Ministry of Education and Culture on page 1 specified that the support was provided under the calls for applications referred in this measure (four Ministry of Education and Culture calls for applications assessed under milestones 127 and 128, displaying title: "Kulttuuri- ja luovien alojen uudistumisen rakennetuki"). The funding memos accompanying project reports submitted to Business Finland for projects in the sample specified in section 'Funding proposal' that the support was provided under the calls for applications referred in this measure (three Business Finland calls for applications assessed under milestones 127 and 128, displaying programme reference "RRF-Luovat alat"). Thereby it is confirmed that the projects received support under the calls for applications under this measure.

The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met – the project reports were submitted to the authorities and the projects received support under the calls for applications under this measure. A statistical analysis was carried out taking into account the overachievement of the target of 181 for a required 131. Based on this, there is statistical assurance that the target has been met, and all its constitutive elements have been satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 131 - Final reports submitted

Related Measure: P3C4I4 - Supporting sustainable and digital growth in the tourism sector

Quantitative Indicator: Number

Baseline: 0

Target: 14

Time: Q2-2025

1. Context:

The objective of the investment is to boost sustainable growth and innovation in the tourism sector. The investment consists of making available digital services to support the tourism sector and RD&I funding for research, experimentation and development projects that support the commercialisation of tourism business and innovations.

Target 131 concerns the submission of 14 reports related to projects that received funding under this measure and in accordance with the eligibility criteria under milestone 130 (assessed as part of Finland's second payment request)

Target 131 is the second milestone or target of the investment, and it follows the completion of milestone 130, related to the publication of a call for applications for research, development and innovation funding. It is accompanied by milestone 132 in this payment request concerning measures to advance sustainable growth in the tourism sector. Target 131 and milestone 132 are the last two milestones and targets of this measure. The investment has a final expected date for implementation by 30 June 2025.

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	List of project reports	A list of project reports submitted by the recipient entities who received support under this measure from Business Finland
3	18 project reports with accompanying funding memos submitted between 31 October 2023 and 02 May 2025	Project reports and funding memos were provided for all 18 recipient entities. As a rule, these project reports were submitted by the representatives of the recipient entities through the Business Finland electronic grant system using a specific document template.

3. Analysis:

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

At least 14 project reports shall be submitted by recipient entities for projects supported under the call for applications referred to in this measure.

The list of project reports submitted by recipient entities is compiled in evidence 2.

Evidence 3 confirms that project reports have been submitted by 18 recipient entities, exceeding the target of 14. The project reports show (in section titled 'Submission') that the report has been prepared and validated by a representative of the entity, and the submission date is generated automatically by the IT system when the report is submitted. Thereby the submission of the project reports to Business Finland is confirmed.

The funding memos accompanying the project reports specify in section 'Funding proposal' that the support was provided under the call for applications referred in this measure, with each funding memo displaying reference "RRF-matkailu". The call for applications was published on 1 March 2022 by Business Finland and it was assessed under milestone 130 as part of Finland's second payment request. Thereby it is confirmed that the projects received support under the call for applications under this measure.

The evidence provided confirmed that the requirements of the target have been met.

Furthermore, in line with the description of the measure, **the investment consists of (…) RD&I funding for research, experimentation and development projects that support the commercialisation of tourism business and innovations**.

The assessment of milestone 130 verified that the call for application specified as eligibility criteria for projects supported under this target that the support was aimed at "RD&I funding for research, experimentation and development projects that support the commercialisation of tourism business and innovations". The evidence submitted for this target (evidence 3) confirms that each selected project was subject to those eligibility conditions.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 132 - Measures to advance sustainable growth in the tourism sector

Related Measure: P3C4I4 - Strengthening competitiveness and boosting growth in crisis-impacted sectors – Supporting sustainable and digital growth in the tourism sector

Qualitative Indicator: Online accessibility of a digital carbon footprint calculator for tourism sector; making available training material for carbon footprint calculator users; making available a handbook and training paths on knowledge-based management in tourism; making available of selected travel routes; making available of the Visit Finland Data Hub.

Time: Q4-2024

1. Context:

The objective of the investment is to boost sustainable growth and innovation in the tourism sector. The investment consists of making available digital services to support the tourism sector and RD&I funding for research, experimentation and development projects that support the commercialisation of tourism business and innovations.

Milestone 132 requires making accessible online a digital carbon footprint calculator and making available related training materials for tourism services, making available a handbook and coaching programmes for knowledge-based management and making available a content automation platform (Visit Finland Data Hub) and at least 10 selected travel routes to explore Finland.

Milestone 132 is the third and final milestone or target of the investment. It follows the completion of milestone 130, related to the publication of the call for applications for RD&I projects for the tourism sector and it is accompanied by target 131 in this payment request, related to submitting reports on those projects that received support under this measure.

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	Purchase agreement for development and maintenance of a digital carbon footprint calculator	A copy of the signed contract between the contractor and the competent authority for the purchase of services to develop and maintain a digital carbon footprint calculator (a confidential piece of evidence)
3	Purchase agreement for expert services related to sustainable travel	A copy of a signed contract between the contractor and the competent authority for the purchase of preparation of the preparation of a carbon footprint calculation and low-carbon training package (a confidential piece of evidence)
4	Link to and set of screenshots related to a digital carbon footprint calculator and training material	A link to the digital carbon footprint calculator incl. training material (stfhub.visitfinland.com) and a set of screenshots related to a digital carbon footprint calculator and training material for the on-the-spot check
5	Purchase agreement for a national operating model for	A copy of the signed contracts between the contractor and the competent authority for the purchase of services to

	knowledge-based management and coaching programmes for tourism companies and regions	implement a national operating model for knowledge-based management and coaching programmes for tourism companies and regions to support the sustainable and digital transition (a confidential piece of evidence)
6	Link to a final report on a national operating model for knowledge-based management	A link to a final report on a national operating model for knowledge-based management provided in the summary document https://www.visitfinland.fi/4aefc0/contentassets/242f0f5314604d75b4ed84a5349dc9b3/matkailun-kansallinen-tiedolla-johtamisen-toimintamalli---loppuraportti.pdf
7	Links to a handbook and coaching programmes	Links to a handbook and coaching programmes based on a national operating model for knowledge-based management for tourism companies provided in the summary document Handbook: https://www.businessfinland.fi/palvelut/tieto-ja-neuvonta/tietopankki/julkaisut//visit-finland/matkailun-tiedolla-johtaminen---kasikirja Coaching programmes: https://www.visitfinland.fi/liiketoiminnan-kehittaminen/akatemia
8	Set of screenshots on coaching programmes at Visit Finland Academia	A set of screen shots on coaching programmes on knowledge-based management available at the Visit Finland Academia website
9	Purchase agreement on developing Visit Finland Data Hub	A copy of the signed contracts between the contractor and the competent authority for the purchase of services for developing Visit Finland Data Hub (a confidential piece of evidence)
10	Link to and set of screenshots related to Visit Finland Data Hub	A link to a content automation platform (Visit Finland Data Hub) https://datahub.visitfinland.com/ and a set of screenshots related to the Visit Finland Data Hub for the on-the-spot check
11	Purchase agreement for developing VisitFinland.com	A copy of the signed contracts between the contractor and the competent authority for the purchase of services for developing VisitFinland.com (a confidential piece of evidence)
12	Links to selected travel routes to explore Finland.	Links to selected travel routes to explore Finland provided in the summary document https://travel-trade.visitfinland.com/en/products-and-iterinaries/selected-routes-for-mindful-travellers/
13	Set of screenshots displaying selected travel routes to explore Finland	A set of screenshots displaying selected travel routes to explore Finland

3. Analysis:

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

The milestone shall contain the following elements:

- **A digital carbon footprint calculator for tourism services shall be accessible online. The training material on the use of the digital footprint calculator for users shall be published.**

Business Finland has purchased development and maintenance services of a carbon footprint calculator for tourism services through a service purchase agreement that was finalised by the last signatory on 21 February 2022 (evidence 2). The purchase agreement entered into force on 1 March 2022 in accordance with article 7 of the agreement. As stipulated in section 3 of the agreement, the services include maintenance service of the calculator from 1 March 2022 onwards and making available of the calculator for users in a web address agreed by the parties. Business Finland has also purchased expert services to develop and make available training on carbon footprint counting and low-carbon travel services through a service purchase agreement that was finalised by the last signatory on 25 November 2022 (evidence 3). The agreement entered into force on 25 November 2022, after the last signature, in accordance with Article 28(1) of the agreement. Section 2 of the annex of the agreement, under heading "Objective of the purchase", specifies that the procurement contains the preparation of a carbon footprint calculation and low-carbon training package. The authorities provided links to the digital carbon footprint calculator and the related training material (evidence 4). This evidence also shows screenshots from the carbon footprint calculator for tourism services and related training material which justify the availability of the calculator and the publication of related training material for the users of the carbon footprint calculator.

The Commission services conducted an on-the-spot check on 30 January 2026 to verify evidence 4, i.e. the availability of the digital carbon footprint calculator and related training material as required by the milestone description. This check was completed successfully, confirming that Business Finland has made available the digital carbon footprint calculator and related training material. Making available the calculator and related training material is considered to advance sustainable growth in the tourism sector.

- **Based on a national operating model for knowledge-based management, a handbook and coaching programmes for tourism companies and regions shall be made available.**

Business Finland purchased services to implement a national operating model for knowledge-based management and coaching programmes for tourism companies and regions through a service purchase agreement that was finalised by the last signatory on 16 June 2021. The agreement entered into force on 16 June 2021, after the last signature, in accordance with article 7 of the agreement. Section 3 of the agreement specifies that a handbook and coaching programmes were included in the purchase agreement (evidence 5). Furthermore, the authorities provided a link to the final report on national operating model for knowledge-based management. The Commission services accessed the link provided by the authorities on 22 January 2026 to verify that the handbook and coaching programmes are part of the national knowledge-based management model (p.23 of the final report, evidence 6). This check was completed successfully, confirming that the handbook and coaching programmes are based on the national operating model for knowledge-based management.

The authorities provided a link to the knowledge-based management handbook which is available online on the Visit Finland website. In addition, the authorities provided a link to Visit Finland Academy (Visit Finland Akatemia) (evidence 7) and a screenshot of Visit Finland Academy (evidence 8). The Commission services accessed the links provided by the authorities on 22 January 2026 to verify that i) the knowledge-based management handbook; and i) coaching at Visit Finland Academy are made available. It was verified that the academy offers for tourism companies individual courses on: i) basics of knowledge-based management; ii) yield management; and iii) customer feedback and digital customer experience development as well as training paths on: i) improving sustainability and

profitability (“Kestävyyttä kehittämässä: Tiedolla johtamisen supervoima tulevaisuuden menestyksessä -valmennuspolku”); and ii) smart (data-based), responsible tourism business (“Älykkäästi vastuullinen matkailuyritys – datasta kannattavaan liiketoimintaan -valmennuspolku”). Separately for regions, Visit Finland Academy offers a course and a training path on knowledge-based management. This check was completed successfully, confirming that based on a national operating model for knowledge-based management, a handbook and coaching programmes for tourism companies and regions have been made available. Making available the handbook and related coaching programmes is considered to advance sustainable growth in the tourism sector.

- **A content automation platform – Visit Finland Data Hub – and at least 10 selected travel routes to explore Finland shall be made available.**

Business Finland purchased services to develop Visit Finland Data Hub through a service purchase agreement that was finalised by the last signatory on 12 June 2020 (evidence 9). The agreement entered into force on 12 June 2020, after the last signature, in accordance with article 30(1) of the agreement. Annex 1 of the agreement specifies, under heading ‘Objective of the purchase’, that Visit Finland Data Hub is a platform for content management automation for the purposes of tourism marketing in Finland. The authorities provided a link to the platform that has been made available online (evidence 10). The authorities submitted screenshots from the Visit Finland Data Hub environment which justify the availability of the services (evidence 10).

The Commission services conducted an on-the-spot check on 30 January 2026 to verify the evidence item 10, i.e. the availability of the Visit Finland Data Hub as required by the milestone description. This check was completed successfully, confirming that Business Finland has made available the service for tourism sector companies.

The agreement for the purchase of services to develop VisitFinland.com website was signed by all parties to the agreement on 7 October 2021 (evidence 11). The agreement entered into force on 7 October 2021, after the last signature, in accordance with article 5 of the agreement. Section 2.1.2 of the annex 1 of the agreement specifies that the website has section “Do, See & Feel” that “collects together all what one can do, see and experience in Finland. The user is encouraged to browse the offer and find the destinations, routes, activities and services that suit them the best.” The authorities provided a link to the VisitFinland.com website where 10 selected travel routes to explore Finland have been made available (evidence 12). The authorities also submitted screenshots from the VisitFinland.com website displaying the 10 selected travel routes (evidence 13). The Commission services accessed the link provided by the authorities on 22 January 2026 to verify that the travel routes as shown in evidence were made available. This check was completed successfully, confirming that the requirement that 10 selected travel routes to explore Finland have been made available is satisfactorily fulfilled. Making available Visit Finland Data Hub and the 10 selected travel routes is considered to advance sustainable growth in the tourism sector.

Furthermore, in line with the measure description, **the investment consists of making available digital services to support the tourism sector (…)**

The evidence shows, as explained above, that Finland has made available among others a digital carbon footprint calculator, a content automation platform (Visit Finland Data Hub) and a set of selected travel routes on the Visit Finland website. These digital services are targeted at and support tourism sector companies, offering help to carry out their activities. Thereby it is considered that the requirement of the measure description is fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 137 – Regional multi-sector service management models provided in all welfare areas

Related Measure: P4C1.I2 Prevention and early identification of health problems

Qualitative Indicator: Regional multisector service management models provided in all welfare areas

Time: Q4 2024

1. Context:
The objective of this investment is to promote health and well-being. The measure consists of providing multi-sector service management models at welfare area level.
Milestone 137 is the only milestone of this investment, related to provision of regional multi-sector service management models (including social welfare and healthcare services and cultural, sport and nature-related services).

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.	
2	Compilation report of multisector service management models	Compilation report of multisector service management models in different welfare areas. The reports by welfare areas are contractually required for state-funded projects as per compilation report in item 4 of this evidence list.
3	Compilation of the digital service platforms	Compilation of the screenshots for digital service platforms required under the multisector service management models in different welfare areas **Kanta-Häme:** https://omahame.fi/web/hyvinvointisi-tueksi **Pirkanmaa:** https://www.pirha.fi/web/hyvinvointiaelintavoilla/hyvinvoinnin-palveluhaku **Helsinki:** https://www.hel.fi/fi/paatoksenteko-ja-hallinto/tietoa-helsingista/hyvinvoiva-helsinki **Länsi-Uusimaa:** https://www.luvn.fi/fi/hyvinvointipalvelut **Pohjanmaa:**https://hyvinvointiopas.pohjanmaanhyvinvointi.fi/ **Pohjois-Karjala:** https://www.miunhyvinvointi.fi/ **Pohjois-Pohjanmaa:** https://pohde.fi/palvelumme/reittis-kohti-hyvinvointia/ **Pohjois-Savo:** https://omahyte.fi/ **Satakunta:** https://hyvinvointimajakka.satakunnanhyvinvointialue.fi/ **Keski-Pohjanmaa:** https://tarmoa.fi/fi **Päijät-Häme**: https://hyvinvointiopas.paijatha.fi/ **Itä-Uusimaa:** https://hyvinvointitarjotin-staging.itauusimaa.fi/fi **Etelä-Pohjanmaa:** https://tarmoa.fi/fi **Varsinaissuomi:** https://hyvinvointiopastaja.varha.fi/ **Vantaa–Kerava:** https://vakehyva.fi/fi/tietoa-

		meista/hyvinvoinnin-ja-terveyden-edistaminen **Etelä-Karjala:** https://tarmoa.fi/fi **Etelä-Savo:** https://hyvinvointitarjotin.etelasavonha.fi/ **Lappi:** https://lapha.fi/hyvinvointia-arkeesi **Keski-Uusimaa:** https://www.keusote.fi/hyvinvointi/ **Kymenlaakso:** https://hyvinvointia.kymenhva.fi/ **Keski-Suomi:** https://hyvinvointitarjotin.hyvaks.fi/fi **Kainuu:** https://tarmoa.fi/fi
4	Compilation of the contracts between the welfare area and the Ministry of Social Affairs and Health	"*Valtionavustuksen myöntäminen Suomen kestävän kasvun ohjel man hankkeelle vuosille 2023–2025*" – contracts demonstrating that the final report (item 2 on this evidence list) is a contractual obligation. • Etelä-Karjala p.10 • Etelä-Pohjanmaa p. 27 • Etelä-Savo p. 43 • Helsinki p. 60 • Itä-Uusimaa p. 76 • Kainuu p. 92 • Kanta-Häme p.108 • Keski-Pohjanmaa p. 124 • Keski-Suomi p. 141 • Keski-Uusimaa p. 157 • Kymenlaakso p. 173 • Lappi p. 189 • Länsi-Uusimaa p. 206 • Pirkanmaa p. 222 • Pohjanmaa p. 240 • Pohjois-Karjala p. 256 • Pohjois-Pohjanmaa p. 276 • Pohjois-Savo p. 294 • Päijät-Häme p. 312 • Satakunta p. 330 • Vantaa ja Kerava p. 347 • Varsinais-Suomi p. 366

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

Regional multi-sector service management models (including social welfare and healthcare services and cultural, sport and nature-related services) shall be provided in all welfare areas.
Furthermore, in line with the description of the measure, the investment **consists of providing multi-sector service management models at welfare area level**.
The Finnish Institute for Health and Welfare web pages explain that multisectoral service management models consist of health and wellbeing related work implemented by various stakeholders including the welfare areas, communities and non-state actors, guiding customers across the sectors and through different channels, including digital services. Focus is on preventive work and healthy lifestyles. All welfare areas have developed and launched a digital service platform, which provides information about services promoting health and

wellbeing in the region. On this platform the citizens and professionals are provided for example with sports, nature, culture, health and social services related guidance, service providers and digital solutions for self-care.

Regional multi-sector service management models have been adopted in all 22 welfare areas (regional structure created in 2023, and assessed under the milestones 133, 134 and 135 in the context of the 1st and 3rd payment requests). Multi-sector service management models developed by the welfare areas vary between the areas and usually cover a wealth of activities to promote active, inclusive and healthy lifestyles at different stages of life. At the minimum the digital service platform developed for each region covers social welfare and healthcare services and cultural, sport and nature-related services. With the exception of those welfare areas, where the platform was based on Tarmoa-platform, the platforms either link to, or are offered as part of the overall welfare area and city of Helsinki webpages. These pages provide guidance on social and healthcare services both on the digital platform and through the linked welfare area web pages. The regional multi-sector service management models for the 22 welfare areas are as follows:

- **Kanta-Häme:** The compilation report (page 1 of item 2 on the evidence list) describes the content of the multiservice management model in Kanta-Häme welfare area. The model involves professionals, who guide their customers to activities and services by the welfare area, the communities, NGOs and religious actors. The professionals have been trained with the concept to guide the customers e.g. to sports, nature, culture, nutritional, lifestyle, mental health, addiction and involvement services and activities. In addition, specific concepts have been developed e.g. for sports and lifestyle related counselling, preventive work for addictions and involvement of the youth. Item 3 on the evidence list, starting page 5 and 121 provides screenshots for the digital platform for Kanta-Häme. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Pirkanmaa:** The compilation report (starting page 10 of item 2 on the evidence list) describes the content of the multiservice management model in Pirkanmaa welfare area. In Pirkanmaa a number of indicators have been created to monitor the impact of the multisector service model, under which customers are guided to services in accordance to their needs. In addition, specific concepts were developed e.g. for sports counselling and nutritional counselling. Item 3 on the evidence list, starting page 54 and 154 provides screenshots for the digital platform for Pirkanmaa. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Helsinki:** The compilation report (starting page 24 of item 2 on the evidence list) describes the content of the multiservice management model in Helsinki. The model involves professionals, who guide their customers to multisectoral activities and services. The professionals have been trained with the concept to guide the customers e.g. to sports, nature, culture, nutrition, healthy lifestyle, mental health and economic guidance services and activities. In addition, specific concepts have been developed e.g. for wellbeing counselling for

senior citizens and for appointment system for the sports counselling in the customer information system. Item 3 on the evidence list, starting page 85 and 118 provides screenshots for the digital platform for Helsinki. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.

- **Länsi-Uusimaa:** The compilation report (page 42 of item 2 on the evidence list) describes the content of the multiservice management model in Länsi-Uusimaa welfare area. The model involves trained professionals to guide their customers to e.g. sports, nature, culture, nutritional, healthy lifestyle, mental health, old age and domestic violence related services and activities. A number of specific concepts to support the model are under development. Item 3 on the evidence list, starting page 76 and 127 provides screenshots for the digital platform for Länsi-Uusimaa. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Pohjanmaa:** The compilation report (starting page 64 of item 2 on the evidence list) describes the content of the multiservice management model in Pohjanmaa welfare area. The model involves trained professionals to guide their customers to e.g. sports, nature, culture, nutritional, healthy lifestyle, mental health, addiction, oral health and brain health related services and activities. Specific concepts have been created e.g. for sports counselling and youth and parents. Item 3 on the evidence list, starting page 91 and 128 provides screenshots for the digital platform for Pohjanmaa. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Pohjois-Karjala:** The compilation report (starting page 70 of item 2 on the evidence list) describes the content of the multiservice management model in Pohjois-Karjala welfare area. The model involves trained professionals to guide their patients to e.g. nature, sports, culture nutrition, healthy lifestyles, mental health, participation and sleep related services and activities. Item 3 on the evidence list, starting page 9 and 129 provides screenshots for the digital platform for Pohjois-Karjala. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Pohjois-Pohjanmaa:** The compilation report (starting page 101 of item 2 on the evidence list) describes the content of the multiservice management model in Pohjois-Pohjanmaa welfare area. In Pohjois-Pohjanmaa the concept is based on the digital platform Reittis, which is used by the professionals who guide their patients to e.g. sports, nature, culture, nutritional, participation, healthy lifestyles, financial matters, mental health, and workability related services and activities. Specific concepts have been created e.g. for the role

of nutritional specialist in remote lifestyle counselling and for the referral to wellbeing activities. Item 3 on the evidence list, starting page 99, 130 and 160 provides screenshots for the digital platform for Pohjois-Pohjanmaa. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.

- **Pohjois-Savo:** The compilation report (starting page 126 of item 2 on the evidence list) describes the content of the multiservice management model in Pohjois-Savo welfare area. In Pohjois-Savo the model involves trained professionals to guide their patients to multisectoral services including sports, nature, culture, nutritional, participation and healthy lifestyles related services and activities. Specific concept has also been developed for the referral to wellbeing activities. Item 3 on the evidence list, starting page 19 and 131 provides screenshots for the digital platform for Pohjois-Savo. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Satakunta:** The compilation report (starting page 147 of item 2 on the evidence list) describes the content of the multiservice management model in Satakunta welfare area. Concepts were prepared for children, youth, adults, families and senior citizens for multisectoral services with focus on preventive activities. Specific concept was also developed for referral to cultural activities. Item 3 on the evidence list, starting page 71 and 133 provides screenshots for the digital platform for Satakunta. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Keski-Pohjanmaa:** The compilation report (starting page 159 of item 2 on the evidence list) describes the content of the multiservice management model in Keski-Pohjanmaa welfare area. The model involves trained professionals to guide their patients to e.g. sports, nature, culture, nutritional, mental health, healthy lifestyles and participation related services and activities. Specific models have been created e.g. for referrals to wellbeing activities, financial counselling, for the unemployed, for rehabilitation counselling of e.g. those with addictions, and for communal living. Item 3 on the evidence list, starting page 108 and 122 provides screenshots for the digital platform for Keski-Pohjanmaa. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Päijät-Häme**: The compilation report (starting page 172 of item 2 on the evidence list) describes the content of the multiservice management model in Päijät-Häme welfare area. In Päijät-Häme the concept is based on the digital platform, which can be used by the professionals to guide their patients to e.g. sports, nature, culture, nutritional, healthy

lifestyles, mental health, and participation related services and activities. Specific concepts have been created for those with diabetes and for those with sleeping disorders. Prevention and proactive use by customers are emphasised on the digital platform. Item 3 on the evidence list, starting page 96 and 132 provides screenshots for the digital platform for Päijät-Häme. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.

- **Itä-Uusimaa:** The compilation report (starting page 183 of item 2 on the evidence list) describes the content of the multiservice management model in Itä-Uusimaa welfare area. In Itä-Uusimaa the model involes trained professionals to guide their patients to multisectoral services including sports, nature, lifestyle, sleeping, nutrition, smoking and also culture related services and activities. Specific concepts have been created for sports and nature. Item 3 on the evidence list, starting page 29 and 119 provides screenshots for the digital platform for Itä-Uusimaa. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Etelä-Pohjanmaa:** The compilation report (starting page 194 of item 2 on the evidence list) describes the content of the multiservice management model in Etelä-Pohjanmaa welfare area. The model involves trained professional to guide their patients to e.g. sports, nature, culture, nutritional, mental health, healthy lifestyles and participation related services and activities. Specific concepts have been created e.g. for physiotherapy and for sports counselling for children, youth and families. Item 3 on the evidence list, starting page 108 and 116 provides screenshots for the digital platform for Etelä-Pohjanmaa. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Varsinais-Suomi:** The compilation report (starting page 213 of item 2 on the evidence list) describes the content of the multiservice management model in Varsinais-Suomi welfare area. In Varsinais-Suomi, multisectoral service management model has piloted for diabetes patients. Also, concept has been created for treating sleeping disorders without medicines. Item 3 on the evidence list, starting page 25 and 135 provides screenshots for the digital platform for Varsinais-Suomi. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Vantaa–Kerava:** The compilation report (starting page 217 of item 2 on the evidence list) describes the content of the multiservice management model in Vantaa-Kerava welfare area. The model involves trained professionals to guide their customers to e.g. sports, nature, culture, nutritional, mental health, healthy lifestyles and participation related services and activities. Specific concepts have been created e.g. for referral to cultural and educational

activities, for informal caregivers and for addressing loneliness. Item 3 on the evidence list, starting page 39 and 134 provides screenshots for the digital platform for Vantaa-Kerava. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.

- **Etelä-Karjala:** The compilation report (starting page 232 of item 2 on the evidence list) describes the content of the multiservice management model in Etelä-Karjala welfare area. The model involves trained professionals to guide their customers to e.g. sports, nature, culture, nutritional, mental health, healthy lifestyles and addiction related services and activities. Specific concepts have been created e.g. for group counselling on healthy lifestyle and for the referral to cultural activities. Item 3 on the evidence list, starting page 108 and 115 provides screenshots for the digital platform for Etelä-Karjala. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Etelä-Savo:** The compilation report (starting page 241 of the item 2 on the evidence list) describes the content of the multiservice management model in Etelä-Savo welfare area. The model involves trained professionals to guide their customers to e.g. sports, nature, culture, nutritional, mental health, healthy lifestyles and participation related services and activities. Item 3 on the evidence list, starting page 1 and 117 provides screenshots for the digital platform for Etelä-Savo. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Lappi:** The compilation report (starting page 253 of item 2 on the evidence list) describes the content of the multiservice management model in Lappi welfare area. In Lappi the concept is based on the digital platform, which is used by the professionals who guide their customers to e.g. sports, nature, culture, nutrition, participation, healthy lifestyles, mental health and participation related services and activities. In addition, concepts have been developed e.g. to address social exclusion and domestic violence. Item 3 on the evidence list, starting page 61 and 126 provides screenshots for the digital platform for Lappi. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Keski-Uusimaa:** The compilation report (starting page 267 of item 2 on the evidence list) describes the content of the multiservice management model in Keski-Uusimaa welfare area. The model involves trained professionals to guide their customers to e.g. sports, nature, culture, nutritional, mental health, healthy lifestyles and participation related services and activities. In addition, specific concepts have been developed e.g. for families with children and the overweight youth. Item 3 on the evidence list, starting page 57, 124 and 145 provides

screenshots for the digital platform for Keski-Uusimaa. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.

- **Kymenlaakso:** The compilation report (starting page 295 of item 2 on the evidence list) describes the content of the multiservice management model in Kymenlaakso welfare area. The model involves trained professionals to guide their customers to e.g. sports, nature, culture, nutritional, mental health, healthy lifestyles and participation related services and activities. In addition, specific concepts have been developed e.g. for sports and culture referrals, for quitting smoking and addressing social exclusion. Item 3 on the evidence list, starting page 68, 125 and 148 provides screenshots for the digital platform for Kymenlaakso. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Keski-Suomi:** The compilation report (starting page 331 of item 2 on the evidence list) describes the content of the multiservice management model in Keski-Suomi welfare area. The model involves professionals to guide their customers to e.g. sports, nature, culture, nutritional, mental health, healthy lifestyles and participation related services and activities. In addition, specific concepts have been developed e.g. for wellbeing referrals for the unemployed and senior citizens, which could include sports, cultural and other activities by the network of organisations in the field. Item 3 on the evidence list, starting page 34 and 123 provides screenshots for the digital platform for Keski-Suomi. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.
- **Kainuu:** The compilation report (starting page 341 of item 2 on the evidence list) describes the content of the multiservice management model in Kainuu welfare area. The model involves trained professionals to guide their customers to e.g. sports, nature, culture, nutritional, and participation related services and activities. In addition, specific concepts exist e.g. for theatre referrals and referrals to cultural or educational activities. Item 3 on the evidence list, starting page 108 and 120 provides screenshots for the digital platform for Kainuu. The Commission services accessed the link provided by the authorities on 6 February 2026 to verify the existence of the digital platform with information and guidance on at least sports, nature, cultural, health and social services. This check was completed successfully, confirming provision of multisectoral services for health and wellbeing including social welfare and healthcare services and cultural, sport and nature related services. The website provides information, digital solutions and multisectoral guidance.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.