

Conclusions and recommendations of the National Audit Office

Preparation and coordination of EU affairs in the Government

The aim of the audit was to determine whether the preparation of EU affairs at national level ensures Finland's effective influence in drafting legislation and decision-making in the EU institutions. In order to ensure success, it is important to have well-functioning procedures for national-level preparation and coordination, both inside ministries and between them. National-level preparation of EU affairs must be effective so that the Government can deal with these issues in a strategic and broad-based manner and influence the EU decision-making process. In the view of the National Audit Office, preparation and coordination of EU affairs at national level are, as a whole, properly managed even though there are also areas where improvements are needed.

Strong commitment by ministries' senior civil servants is essential

Commitment of the management is essential to ensure high quality of the preparation of EU affairs in ministries. The performance of individual ministries in the management of EU affairs partially depends on the attitudes of the senior civil servants, particularly permanent secretaries and heads of departments. There were indications in the audit that not all persons in managerial positions are equally committed to ensuring successful preparation and coordination of EU affairs. For example, it seems that prioritising EU projects and issues is a problem in some ministries.

The input of the senior and middle management in ministries is also essential when Finland needs to influence decision-makers in EU institutions and other Member States. Finland must be able to exert influence at all levels in such EU affairs that it considers highly salient. The Government should have a properly built streamlined procedure for distributing information among ministries about high-level meetings and visits.

The management is responsible for ensuring that civil servants in the ministry possess high-quality expertise in EU affairs. It is essential that each ministry has civil servants who have acquired expertise by working in EU institutions, EU agencies, Finland's Permanent Representation to the European Union or other similar bodies. According to the audit findings, ministries have not made full use of the expertise and networks of the persons returning to Finland. Every ministry should fully recognise the work performed by its civil servants in EU bodies.

Ministries have different practices concerning the coordination of EU affairs - centralised model has its advantages

Ministries have adopted different structures and practices for internal preparation and coordination of EU affairs. In the view of the National Audit Office, the centralised coordination model is better suited for ensuring a systematic preparatory process than the decentralised model. The persons responsible for coordinating EU affairs in individual ministries should possess adequate experience, enjoy full management

support and have smooth-working networks within the ministries and with parties outside the ministries.

According to a recent report (Uusikylä et al. 2015), national impact assessments of EU initiatives are seldom made and they are general in nature. This conclusion is supported by the findings of the audit. National impact assessments would support Finnish efforts to have more influence in the EU. In matters salient for Finland, the preparation of the impact assessments should be started early and be based on, for example, programming in the European Commission or “weak signals” received by Finland’s Permanent Representation.

Finland should have a concrete overall strategy for its EU policy

The Government Report on EU Policy (published each government term) and the EU policy priorities (published each year) are the tools used in the planning of the overall strategy of Finland’s EU policy. According to the audit findings, the EU policy priorities set by the Government have not had much steering impact on the policy. However, the process of preparing the policy priorities has been quite useful as it has forced each ministry to set out its own EU priorities on an annual basis.

According to the audit findings, the objectives laid out in the Government’s EU strategy should be sufficiently concrete so that the achievement of the objectives can be assessed retrospectively. The overall EU policy objectives could be made better known: For example, national impact assessments could be made on the issues listed in the EU strategy using joint Government resources. There could also be trainings arranged for all Government employees on these issues.

Preparation of EU affairs of horizontal in nature should be emphasised

According to the audit findings, the national coordination system of EU affairs is, as a whole, performing well. In addition to the coordination system, ministries cooperate with each other and stakeholders. For example, ministries arrange consultation rounds for stakeholders that are similar to those used in the drafting of national legislation. However, it was also noted in the audit that there are problems in national-level preparation and coordination of EU affairs. For example, the national documents concerning EU affairs should be more concise.

The Government EU Affairs Department at the Prime Minister’s Office is responsible for ensuring the proper functioning of the coordination system. The department uses a large proportion of its resources for preparing European Council meetings and assisting the Prime Minister. According to the audit findings, the department could more often take part in the preparation of horizontal EU affairs that are important to Finland and that are not on the agenda of the European Council. However, full consideration should be given to the competence of the ministries responsible for the issues.

The Committee for EU Affairs is the least used part of the coordination system

The fact that little use is made of the Committee for EU Affairs was highlighted as a deficiency in the EU coordination system in the inter-

views conducted as part of the audit. The committee meets infrequently and nearly all meetings are only attended by deputy members. It was proposed in the 2009 Government report on effective EU policy that the role of the Committee for EU Affairs should be strengthened. However, according to the audit findings, this has not happened.

The sub-committees preparing EU matters constitute the foundation for coordinating the matters at Government level (cf. Council Working Groups). They serve as an important source of information for stakeholders. The sub-committees should meet in extended composition, including stakeholders, whenever possible. More use should be made of the sub-committees in proactive preparation of EU affairs and in broad-based discussion about priorities. This would require careful preparation of the meetings in the ministries concerned.

In addition to the official coordination system, there is a great deal of unofficial preparation between ministries in EU affairs. Better use should be made of existing national practices and tools. There should also be practices and tools for ensuring adequate documentation in unofficial cooperation between ministries; however, retaining the agility typical of such co-operations.

Recommendations of the National Audit Office

1. Finland's EU policy priorities and the Government's EU strategy should be sufficiently concrete and detailed. This ensures that the objectives laid out in the documents can have an impact on the management of EU affairs. Furthermore, the achievement of the objectives can be assessed retrospectively. The procedure in which individual ministries lay out their own EU priorities each year should be continued.
2. Senior civil servants in ministries should be committed to managing EU affairs, set priorities and monitor the manner in which the objectives are achieved. Senior civil servants should ensure that their ministries' internal coordination practices function properly and that the ministries have allocated adequate resources for managing EU affairs. Especially in ministries with decentralised coordination, it should be ensured that the preparation of EU matters is on an effective and systematic basis.
3. Ministries' senior and middle management should have an active role, for example, in communicating with officials in similar positions in EU institutions and in the most important Member States. This enhances Finland's influence in EU decision-making.
4. In EU affairs important to Finland, national impact assessments should be made on the basis of available information. The impact assessments should be prepared early enough so that the information contained in them can be used proactively.
5. Each ministry should encourage its civil servants to gain experience by working in the EU institutions, EU agencies, Finland's Permanent Representation etc. The ministries should plan well in advance how they intend to use the experience and networks of these civil servants when they return to Finland.