

INTERNATIONAL MONETARY FUND

IMF Country Report No. 19/7

FINLAND

January 2019

2018 ARTICLE IV CONSULTATION—PRESS RELEASE; STAFF REPORT; AND STATEMENT BY THE EXECUTIVE DIRECTOR FOR FINLAND

Under Article IV of the IMF's Articles of Agreement, the IMF holds bilateral discussions with members, usually every year. In the context of the 2018 Article IV consultation with Finland, the following documents have been released and are included in this package:

- A Press Release summarizing the views of the Executive Board as expressed during its January 11, 2019 consideration of the staff report that concluded the Article IV consultation with Finland.
- The Staff Report prepared by a staff team of the IMF for the Executive Board's
 consideration on January 11, 2019, following discussions that ended on November 06,
 2018, with the officials of Finland on economic developments and policies. Based on
 information available at the time of these discussions, the staff report was completed
 on December 17, 2018.
- An Informational Annex prepared by the IMF staff.
- A Statement by the Executive Director for Finland.

The documents listed below have been or will be separately released.

Selected Issues

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IMF Executive Board Concludes 2018 Article IV Consultation with Finland

On January 11, 2019, the Executive Board of the International Monetary Fund (IMF) concluded the Article IV consultation with Finland.

Finland is enjoying its third consecutive year of economic recovery. The employment rate has picked up sharply and the unemployment rate has declined to its lowest level since 2011. Wages have started to recover, but inflation remains low. Export market shares have improved slightly leading to a pickup in exports, while stronger tax revenues and lower spending, including on unemployment benefits, have improved fiscal balances. Growth in 2018 is expected to be 2.4 percent, then 1.9 percent in 2019 as global demand slows and financial conditions tighten. There are downside risks to this outlook, particularly from the global environment: an increase in protectionism could weaken demand for Finnish exports and damage confidence, and higher bank funding costs could mean tighter credit.

Recent reforms have boosted trade and employment. The 2016 Competitiveness Pact helped make Finnish exports more cost competitive. Changes to social benefits enhanced incentives to look for jobs, and new rules for temporary hires have the potential to boost employment and labor flexibility. Nevertheless, problems remain with productivity and the labor market. Firms are facing difficulties matching workers to job opportunities. Unemployment rates remain persistently high in some regions despite ample vacancies in others. Job mobility is low and has not picked up. Meanwhile, productivity growth is still below pre-crisis rates, despite the strength of the recovery.

The 2019 budget implies a moderate tightening of fiscal policy. The planned health and social services reform targets substantial savings from efficiency gains which, if realized, would make a substantial contribution toward closing the fiscal sustainability gap and restoring fiscal buffers.

¹ Under Article IV of the IMF's Articles of Agreement, the IMF holds bilateral discussions with members, usually every year. A staff team visits the country, collects economic and financial information, and discusses with officials the country's economic developments and policies. On return to headquarters, the staff prepares a report, which forms the basis for discussion by the Executive Board. At the conclusion of the discussion, the Managing Director, as Chairman of the Board, summarizes the views of Executive Directors, and this summary is transmitted to the country's authorities. An explanation of any qualifiers used in summing up can be found here: http://www.imf.org/external/np/sec/misc/qualifiers.htm.

That said, savings from the proposed reform are uncertain and will depend crucially on implementation.

The banking sector is sound but has distinctive features that pose challenges for supervision. Immediate financial stability risks appear limited, but the system is highly concentrated, interconnected with financial sectors of other Nordic countries, and reliant on wholesale funding. In addition, the size of the banking sector has increased substantially with the recent redomicile of Nordea to Finland. This has increased demands on supervision and heightens the importance of continued close regional cooperation and preparedness for crises.

Household financial vulnerabilities remain a concern. Household debt has been increasing as the economy has recovered, and some borrowers appear vulnerable to interest rate increases. The growth in consumer credit raises the question of whether some borrowers are sufficiently informed about the conditions of their loans.

Executive Board Assessment2

Executive Directors agreed with the thrust of the staff appraisal. They welcomed the continued good economic performance but noted that growth is likely to slow next year as global demand moderates and financial conditions tighten. Given relatively modest potential growth, Directors stressed the need for structural reform, particularly in the labor market, and cautious fiscal policy. While sound overall, the financial sector's increased size and regional interconnectedness have increased the demands on supervision.

Directors welcomed recent reforms that have made Finnish exports more cost competitive and helped boost employment. They noted, however, that productivity growth remains below what was seen before the crisis. Therefore, Directors stressed the need for ongoing structural reforms and targeted infrastructure investment to bolster long-term productivity growth.

Directors agreed that the focus of structural reforms should be on increasing labor market dynamism while maintaining a strong safety net. This would call for increased wage flexibility at the firm level and further changes to unemployment benefits to foster increased job search. Directors also noted that efforts to increase regional labor mobility could help reduce regional disparities in unemployment rates.

² At the conclusion of the discussion, the Managing Director, as a Chairman of the Board, summarizes the views of Executive Directors, and this summary is transmitted to the country's authorities. An explanation of any qualifiers used in summings up can be found here: http://www.imf.org/external/np/sec/misc/qualifiers.htm.

Given looming age-related spending pressures and contingent liabilities, Directors underscored the need to continue to rebuild fiscal buffers. Thus, they supported the moderate tightening implied by the 2019 budget and noted that fiscal policy should concentrate on raising the effectiveness of public spending, such as those proposed in the social services and health care reform.

Directors noted that the size of the banking sector has increased substantially with the recent redomicile of the largest financial group in the Nordic countries to Finland, increasing the demands on supervision and regional cooperation as well as crisis preparedness. While housing price increases have been relatively moderate, risks from the real estate sector should be monitored closely due to the high level of household indebtedness.

Directors also noted that growing reliance on consumer credit calls for additional consumer protection measures, such as better information disclosure requirements and interest rate caps. Macroprudential policies could be improved by the use of debt-based tools and access to better data, such as from a comprehensive positive credit registry.

Table 1. Finland: Selected Economic Indicators, 2016–24									
	2016	2017	2018	2019	2020	2021	2022	2023	2024
			/D			Proj.			
Output and demand (volumes)			(Percent	age chang	e, unless o	therwise i	ndicated)		
GDP	2.5	2.8	2.4	1.9	1.7	1.4	1.3	1.3	1.3
Domestic demand	3.1	2.1	2.3	1.8	1.7	1.3	1.2	1.2	1.2
Private consumption	2.0	1.3	2.1	1.8	1.3	1.1	1.1	1.1	1.1
Public consumption	1.8	-0.5	1.5	1.0	1.8	1.0	0.7	0.7	0.7
Gross fixed capital formation	8.5	4.0	3.7	3.0	2.4	2.0	2.0	2.0	2.0
Change in stocks (contribution to growth in percent of GDP)	-0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Exports of goods and services	3.9	7.5	3.2	3.3	3.1	3.1	3.0	3.0	3.0
Imports of goods and services	5.6	3.5	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Net exports (contribution to growth in percent of GDP)	-0.6	1.4	0.2	0.1	0.1	0.1	0.0	0.0	0.1
Prices, costs, and income									
Consumer price inflation (harmonized, average)	0.4	0.8	1.2	1.4	1.6	1.8	1.9	2.0	2.0
Consumer price inflation (harmonized, end-year)	1.1	0.5	1.5	1.5	1.6	1.8	1.9	2.0	2.0
GDP deflator	0.6	0.8	1.6	1.6	1.8	1.8	1.9	2.0	2.0
Unit labor cost, manufacturing	-2.7	-6.9	-0.8	0.0	0.4	0.4	0.5	0.6	0.6
Labor market									
Labor market Labor force	-0.2	0.8	0.3	0.6	0.5	0.3	0.1	0.1	0.1
Employment	0.5	1.0	1.4	0.0	0.5	0.3	0.1	0.1	0.1
Unemployment rate (in percent)	8.8	8.6	7.6	7.3	7.1	7.0	6.9	6.9	6.9
Potential output and NAIRU	0.0	0.0	7.0	7.5	7.1	7.0	0.7	0.7	0.7
Output gap (in percent of potential output) ¹	-2.8	-1.5	-0.5	0.0	0.2	0.1	0.1	0.1	0.1
Growth in potential output	1.0	1.4	1.4	1.5	1.5	1.4	1.3	1.3	1.3
					rcent of GI				
General government finances ²					v				
Overall balance	-1.7	-0.7	-1.0	-0.3	0.0	0.1	0.0	-0.1	0.0
Primary balance ³	-0.6	0.3	-0.1	0.5	0.8	0.9	1.0	1.0	1.0
Structural balance (in percent of potential GDP)	0.0	-0.1	-0.8	-0.5	-0.2	-0.1	-0.2	-0.2	0.0
Structural primary balance (in percent of potential GDP) ³	1.1	0.8	0.0	0.4	0.6	0.7	0.8	0.9	1.0
Gross debt	63.0	61.3	60.5	59.8	58.8	58.4	56.6	54.9	53.2
Net debt ⁴	-53.3	-58.6	-55.3	-53.1	-51.2	-49.6	-48.1	-46.5	-45.0
Money and interest rates					(Percent)				
M3 (Finnish contribution to euro area, growth rate, e.o.p.)	1.8	6.1							
Finnish MFI euro area loans (growth rate, e.o.p.)	1.4	2.6							
Domestic nonfinancial private sector credit growth (e.o.p.)	-2.6	2.4	4.8	4.6	4.6	4.5	4.3	4.0	3.9
3-month Euribor rate (percent)	-0.3	-0.3							
10-year government bonds yield	0.4	0.5							
y g y					rcent of GI				
National saving and investment									
Gross national saving	21.3	22.1	22.5	23.2	23.6	23.8	24.1	24.2	24.4
Gross domestic investment	22.0	22.8	23.0	23.1	23.1	23.2	23.2	23.3	23.5
Balance of payments									
Current account balance	-0.7	-0.7	-0.5	0.1	0.5	0.6	0.8	0.9	1.0
Goods and services balance	-1.0	0.3	0.4	0.7	0.8	0.9	0.9	1.0	1.0
Net international investment position	8.6	2.4	2.6	2.7	3.1	4.7	5.5	6.4	7.9
Gross external debt	195.0	182.2	185.6	188.9	191.9	194.9	198.0	200.4	202.0
Exchange rates (period average)									
Euro per US\$	0.90	0.89							
Nominal effective rate (appreciation in percent)	2.0	0.89							•••
									•••
Real effective rate (appreciation in percent) ⁵	1.2	-0.4	•••						•••
Memorandum items									
Nominal GDP (in Euro billions)	216.1	223.9							•••
Nominal GDP (in U.S. dollar billions at market exch. rates)	239.2	252.8							•••

 $Sources: Bank \ of \ Finland, \ BIS, \ International \ Financial \ Statistics, \ IMF \ Institute, \ Ministry \ of \ Finance, \ Statistics \ Finland, \ and \ Fund \ staff \ calculations.$

 $^{^{\}rm I}$ A negative value indicates a level of actual GDP that is below potential output.

² Fiscal projections include measures as specified in the General Government Fiscal Plan.

³ Adjusted for interest expenditure.

 $^{^{\}rm 4}$ Defined as the negative of net financial worth (i.e., debt minus assets).

⁵ CPI-based real effective exchange rate.



INTERNATIONAL MONETARY FUND

FINLAND

STAFF REPORT FOR THE 2018 ARTICLE IV CONSULTATION

December 17, 2018

KEY ISSUES

Context: Recent growth has been healthy, and the unemployment rate has fallen to its lowest level since 2011. However, some underlying weaknesses remain. The rate in which new jobs are created and the "churn" of workers relocating across jobs has not picked up with the recovery, labor productivity growth remains weak, and the outlook for potential growth is constrained by a shrinking workforce. Household debt has been increasing as the economy has recovered, and some borrowers appear vulnerable to interest rate increases.

- Structural policies: While recognizing the importance of maintaining social
 cohesion, staff recommends further steps to increase labor market dynamism. These
 could include more flexibility to set wages differently among firms in a given sector
 and to increase incentives for job-to-job transitions, facilitating transfer of skills
 across the economy. There is room for further progress to improve incentives from
 social benefits.
- **Fiscal policy:** Staff supports the authorities' plans for moderate tightening to build fiscal buffers, given looming spending pressures from age-related costs, a relatively high level of contingent liabilities, and the typical volatility of the Finnish economy that can put large demands on the public finances.
- Macroprudential policies: The toolkit should be expanded to include debt-to-income and debt-service-to-income caps, supported by a comprehensive credit register. More data are needed to adequately monitor lending by non-banks, whose lending practices might also require changes to consumer protection laws.
- **Financial policies:** The Finnish financial system is sound, but it is also concentrated and highly interconnected with Nordic economies. The responsible authorities have responded to the challenges posed by Nordea's redomicile, which has increased the size of the Finnish banking sector to about 3¾ times GDP by increasing supervisory resources and setting new capital requirements.

Approved By
Mahmood Pradhan
(EUR) and Martin
Sommer (SPR)

Discussions took place in Helsinki during October 25–November 6, 2018. The staff team was comprised of Messrs. Scott (head), Poghosyan, Pillonca, Wingender and Ms. Garcia (all EUR), supported by Ms. Gornicka (MCM), Ms. Tenali and Mr. Yang at headquarters (both EUR). Mr. Virolainen (OED) joined the discussions. The mission met with Mr. Rehn, Governor of the Bank of Finland; Mr. Orpo, Minister of Finance; Ms. Tuominen, head of the FIN-FSA; other senior officials; the ECB; social partners; and representatives of the financial sector and academic communities.

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CONTEXT AND BACKGROUND

1. In the past three years, Finland has emerged from a severe downturn. Since 2008, the economy has weathered two recessions; commendably, income inequality remained low through this period, but the prolonged downturn increased unemployment, stressed the public finances, and likely damaged potential growth. Recovery began in 2015, but only this year has the level of real GDP surpassed that seen in 2007.



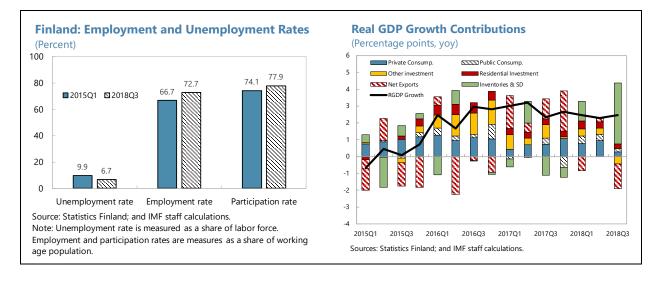
2. Political parties are vying for support

Sources: Haver Analytics; and IMF staff calculations.

ahead of elections next April. Support for left-of-center parties opposing the current right-of-center coalition has increased. However, policy continuity is likely to be preserved following the elections, as there is a broad consensus across the political spectrum on the importance of reforms to boost productivity and maintain fiscal sustainability.

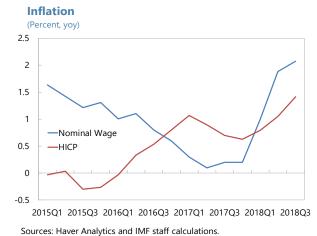
RECENT DEVELOPMENTS

3. The recovery continues, but is in its late stages. Recent growth has been healthy and wide-spread across sectors, boosted by private consumption and residential investment, supported by fiscal and monetary policies. Labor market outcomes have improved significantly over the past year—participation rates and employment have picked up sharply, while the unemployment rate has fallen to its lowest level since 2011. Consumer and business confidence are at their highest levels in many years, but have both fallen during the year.



4. There are few signs currently of macroeconomic imbalances. The recent growth—

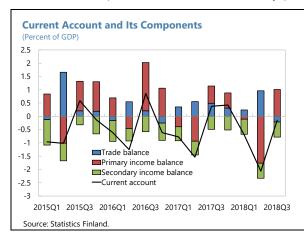
between 2½ to 3 percent y/y for the past 9 quarters—has seen the output gap almost close (Figure 1). Yet costs have been kept in check: after a wage freeze under the Competitiveness Pact, wages (excluding bonuses) have increased over the past year, but nonetheless modestly in most sectors and only 2 percent overall. Inflation pressures remain subdued; headline CPI inflation is currently 1½ percent y/y, despite increases in fuel costs. Credit growth overall is moderate, and the housing market does not show rapid price growth or signs of excessive exuberance (Figure 2).

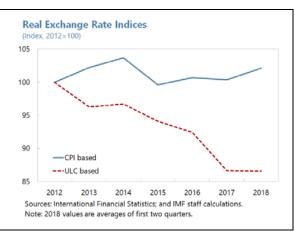


5. The public finances have improved with the recovery. The overall balance in 2017 was better than staff expected (-0.7 instead of -1.4 percent of GDP), reflecting both improved revenues from higher growth and employment (offsetting lower taxes and social security contributions) and lower spending and expenditures on unemployment benefits. General government gross debt fell slightly, to 61 percent of GDP.

6. The most recent data suggest that the external position is moderately weaker than would be implied by fundamentals and desirable policy settings.

• The most recent data show substantial downward revisions to the current account balances (especially income balances) in 2016 and 2017, to -0.7 percent of GDP for both years. Through 2018, export market shares have improved slightly, across markets and products, reversing the steady decline since the onset of the crisis. This is consistent with wage moderation that accelerated the depreciation of the ULC-based real exchange rate in 2017 and a recovery in investment by export-oriented firms during the past three years. However, net income flows are negative for the year, as previously, owing to large dividend payments. The net international investment position remained modestly positive in 2017.





• Staff assess that the external position is moderately weaker than would be implied by fundamentals and desirable policy settings. The current account models indicate that the current account value in 2017 was below its "norm", implying a real exchange rate overvaluation in the order of 5 to 10 percent. Real exchange rate models give similar results. Preliminary results from those models applied to the *projections* of current account balances for 2018 indicate that, on the assumption that the trade balance remains modestly in surplus and the income deficit is similar to that in 2017, the external position would also be moderately weaker than implied by fundamentals and desirable policy settings (Annex I: External Sector Assessment). Going forward, demographic pressures (¶8) and future demands on the public finances (¶29) suggest a need to maintain a modestly positive net national savings rate.

7. Two underlying weaknesses remain.

- Labor market dynamism: Vacancies remain high relative to employment. This might simply reflect limits on how quickly vacancies can be filled, or increased confidence of workers to enter the labor market and hold out for attractive jobs. But job market dynamism—the rate at which new jobs are created and the "churn" of workers relocating across jobs—has not picked up with the recovery (¶34–36 and Figure 4). Consistent with this, value added per employed worker has been slow to recover and is only now at the level seen in 2008.
- Household finances: Household debt has been increasing steadily (¶12–13). Debt levels (based on lending from banks) remain comparable to the euro area average, and well below those of other Nordic households, but the increase is notable given deleveraging by other sectors while the economy has recovered. When non-bank lending and loans to housing corporations are included, household debt is notably higher. The distribution of household debt has been broadly stable in recent years, but unofficial data indicate new borrowers are taking on more leverage than the average.

OUTLOOK AND RISKS

- **8. The current cyclical upswing is expected to moderate.** GDP growth is projected to be 2.4 percent in 2018 and 1.9 percent in 2019, before reverting to a long-run growth rate of 1½ percent.
- Net exports' contribution to growth would remain slightly positive, albeit tempered by gradually tightening financial conditions, increases in costs, and a gradual slowdown in global growth. Private investment growth is therefore assumed to ease off, after three years of above-trend growth. Nonetheless, private consumption growth is expected to be supported by increases in real wages, the improvement in employment, and easy access to credit, and therefore is assumed to ease only slightly in 2019.

GDP Growth, Potential Growth and Output Gap (Percent of GDP) 4 Projections 3 2 1 0 -1 -2 -3 -GDP growth -- Potential growth Output gap, rhs 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 Sources: IMF staff calculations.

- Long-run growth is mainly determined by labor productivity growth, which is expected to be around 1½ percentage points, offset slightly by a net employment contribution of -0.2 percentage points, reflecting the assumption of increasing participation rates that only partly compensate for a declining working age population.
- Inflation is expected to remain low in 2018 and only gradually increase thereafter. The output gap would remain slightly positive for some time, and costs are expected to increase, due mainly to a gradual pickup in wages going forward with modest productivity growth. After the recovery in mark-ups seen over the past two years, firms are expected to absorb much of this pressure by not raising mark-ups further.
- As was anticipated, the overall fiscal balance is projected to remain in deficit in 2018.¹ Revenue measures (including personal income tax cuts and reductions in unemployment contributions) are expected to increase the deficit by about 0.4 percent of GDP, while an almost neutral expenditure budget and favorable cyclical conditions will help contain the deficit expansion to close to 0.3 percent of GDP. Given Finland's position in the business cycle, this implies a fiscal stimulus of 0.7 percent of GDP.² However, the fiscal policy stance is contractionary thereafter, on the assumption that the government expenditure ratio declines in line with the government's consolidation plan, and debt continues to fall.³
- The current account is projected to improve gradually over the forecast horizon, from a half percentage point deficit in 2018 to a surplus of around one percent of GDP after five years. This projection assumes that Finnish firms' export market shares—which had seen large declines over the past two decades with, inter alia, the downturns in IT and pulp and paper industries—will be maintained at recent slightly-higher levels, and that the income balance of the current account improves to about zero.⁴

9. Risks are mainly external and tilted to the downside (Annex IV: Risk Assessment Matrix):

Weaker global growth and trade disruption: The main downward risk is the international trading
environment. In addition to the risks from increased protectionism, the economic cycles of
important trading partners—notably Germany—show some signs of slowing. Finland's exports
are predominantly directed to Europe, although in terms of value added, the United States is the
most important export partner, followed by Russia, Sweden, Germany, China, and the UK. Staff
analysis indicates that the direct effects on Finland from additional tariffs on imports on cars and

¹ Finland—Staff Report for the 2017 Article IV Consultation, ¶18.

² The magnitude of the fiscal stimulus was also affected by the larger than effected one-off windfall revenues from corporate and inheritance taxes in 2017 as well as large unexpected tax rebates, to be paid in 2018.

³ In 2015, as part of reforms aimed at closing the fiscal sustainability gap, the government initiated a multi-year consolidation plan worth 2 percentage points of GDP during 2016–19 of which almost 1.5 percentage points has already been achieved. Details of measures can be found in the <u>Government's Strategic Programme</u>.

⁴ See "Understanding Finland's Export Performance," Finland—Selected Issues, 2017 Article IV Consultation.

- car parts would be small relative to other European countries, but Finnish exports in general would likely suffer to the extent that European demand falters.
- Financial system exposures: The Finnish banking system is systemically exposed to Nordic
 economies, especially their housing markets, both directly through asset holdings of its large
 international banks. Reliance on wholesale funding, including through covered bonds, is also a
 risk. Sharper-than expected increases in global interest rates, prompted for example by higherthan-expected inflation or the materialization of other risks, could curb domestic consumption
 and investment.

Domestic risks include:

• Reforms: Labor productivity and employment growth could slow if reforms to work incentives were to deliver weaker gains than expected. Health and social services reforms (¶30) might stall or fail to deliver the targeted savings, putting the government's objective of closing the fiscal sustainability gap in doubt.

Authorities' Views

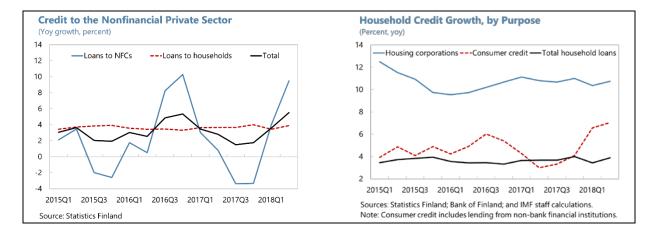
10. The authorities shared the staff's assessment of the outlook and risks. The continued strength of Finland's growth had been encouraging. The output gap has at least closed, and the labor market is tight in some sectors. However, the authorities concurred the cyclical upswing has reached a mature stage and has likely peaked. Recent weak labor productivity growth was a concern. Growth is expected to slow from 2019; views on long-run potential growth ranged from 1 to 1½ percent, but all parties agreed that further increases in participation would likely not be sufficient to offset declining working age population. Aggregate unit labor costs were anticipated to remain in check, limiting cost pressures, leading authorities to expect inflation to rise gently. Risks to the outlook were perceived as stemming predominantly from a further escalation of trade tensions, which could undermine exports and disrupt production and investment, given Finland's deep integration in global supply chains. The authorities noted that Finland's overall external position had improved since last year. Based on the data at the time of the Article IV consultation that showed an external trade surplus in 2017, they felt that the real exchange rate was no longer overvalued, partly reflecting the benefits of wage moderation, which had lowered labor costs markedly, particularly in 2017.

POLICY DISCUSSIONS

11. The discussions focused on policies to mitigate risks and to increase growth. The mix of policies affecting aggregate demand going forward is balanced and appropriate. The bigger challenges are to manage risks arising from household finances and a concentrated and interconnected banking system (sections A and B), address long-run demands on the public finances (section C), and improve the efficiency of the labor market (section D).

A. Credit Markets, Real Estate, Borrower Risks, and Macroprudential Policies

12. Credit has expanded moderately overall, but housing corporation loans and consumer credit have been rising more rapidly. Total loan growth to the private nonfinancial sector has remained broadly constant at around 3½ percent for the past five years. Most lending to households has been in the form of secured lending for housing, which has grown around 4 percent. Corporate loan growth has rebounded strongly in the second quarter of the year after a sharp contraction in the second half of 2017. Two lending categories stand out:



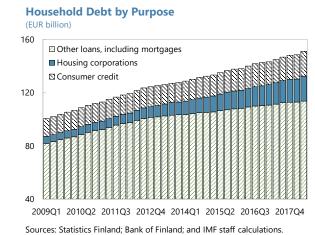
- Loans to housing corporations have been expanding rapidly—above 10 percent—for many years. The drivers—expansion of the housing stock and renovation of rental properties—are healthy. But the shareholders of housing corporations include homeowners, making these de facto indirect loans to households, and households might thereby be tempted to take on more debt than can easily be repaid.⁵
- Consumer credit has been increasing steadily—above 7 percent y/y in the second quarter of 2018—and now accounts for 12 percent of aggregate household debt, driven by credit institutions easing lending standards and a rapid increase in non-bank lending. The expansion has been associated with an increase in payment defaults.
- **13. Household debt has been increasing steadily,** despite the increase in real disposable incomes. Saving rates are lower than peers, although some of the difference is attributable to Finland's public pension system. Household debt remains lower than Nordic peers, but is expected to increase further. Highly-indebted households (i.e. those with debt greater than four times their

⁵ Housing corporations effectively borrow on behalf of households. However, the terms and conditions of the loans and the pooling of credit risk among shareholders might not always be fully understood by households, who are ultimately liable for the debt.

⁶ Saving from corporates and the government has increased, accounting for the increase in *national* saving (¶7).

⁷ In PAYG-based pension systems, pension fund assets are considered part of general government savings, as opposed to household savings for funded pension systems. Adjusting gross saving rates for this reduces the difference between Finland's saving rate in 2017 and that of other Nordic countries by 60 percent. See also Rocher, S. and M.H. Stierle 2015, "Household saving rates in the EU—Why do they differ so much?", EC Discussion Paper 005.

income) accounted for over a quarter of borrowing in 2016; preliminary survey data for 2017 indicate that the typical new borrower for housing purchases is taking on leverage of 4½ times income. The share of floating rate loans in household lending is high, exacerbating households' vulnerabilities to interest rate and/or income shocks, although this is mitigated by the prevalence of mortgages with annuity repayments.



- 14. Residential real estate markets do not seem overheated overall, but demand still exceeds supply in major metropolitan areas, and commercial real estate may expose the economy to shocks. Housing starts and completions have been elevated, but price increases in greater Helsinki suggest demand still outstrips supply. Across the whole country, house price increases have been modest, especially in comparison to Nordic peers (Figure 2), with house price deflation in regions outside greater Helsinki. Price-to-income and price-to-rent ratios have not risen much during the recent economic recovery. Low and declining yields in commercial real estate suggest relatively high valuations.
- **15. The authorities have tightened credit policies.** A floor of 15 percent on the average risk weight for housing loans took effect in January for institutions using internal risk-based (IRB) models. Effective July, the maximum loan-to-collateral (LTC) ratio for housing loans (excluding loans on first homes) was cut from 90 to 85 percent.
- 16. The recent tightening is appropriate, but policy could be more effective if the toolkit were modified. Although overall household debt and leverage are not high in comparison with other Nordic countries, there are some cohorts that are increasingly vulnerable to income and/or interest rate shocks—which, in view of the concentration of total lending in real estate (¶20), opens the financial system to risks.
- The current cap on mortgage loans relative to collateral could usefully be replaced with a cap relative to the value of the property, as is common in other countries.⁸ And because the underlying problem is more the level of debt than housing valuations, it would be useful for the authorities to have debt-based macroprudential tools (such as debt-to-income or debt-service-to-income caps) at their disposal should leverage become more stretched. Applying such tools well depends on accurate information. Staff supports the recent Justice Ministry recommendation for the establishment of a "positive credit register"—i.e. a database that credit firms and the FIN-FSA could use to obtain real-time information about customers' debt and income levels. A new

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⁸ To meet the cap, loan applicants are able to pledge collateral aside from the residence itself, meaning that loans could exceed values.

- challenge arises from non-bank lending, including online platforms such as peer-to-peer lending, which is not being recorded in credit statistics and registers (section B and Box 1).
- The growing reliance on consumer credit, especially that provided by non-banks and via digital platforms, raises additional concerns. Some of these outlets are not regulated and provide crossborder financing. Attempts were made to circumvent legally-binding interest rate caps, raising the question of whether borrowers—especially those dealing with non-bank lenders—are sufficiently informed about the conditions of their loans. The authorities are amending the legislation on interest rate caps to close loopholes. Additional consumer protection measures are needed and require more data collection, especially on consumer lending provided through digital platforms. Tighter prudential requirements to demonstrate creditworthiness could also be considered.
- **17**. Macroprudential authority tools should not be expected to solve underlying supply problems. The authorities have already implemented measures to expand housing supply in urban areas, including Helsinki. The government provides considerable support for social housing, which should make it easier to move across regions. 9 But property taxation could be deterring mobility: recurrent property taxes collected by municipalities tend to be low, with some exceptions, while transaction tax rates are steeper at 4 percent.¹⁰

Authorities' Views

18. The authorities assessed borrower risks to be increasing. Household debt was thought to be already high, with particular risks associated with consumer lending and housing corporation loans. Unsecured consumer lending, especially by non-banks, could be associated with onerous terms and conditions. Similarly, the authorities noted that shareholders in housing corporations might not appreciate the debt that they had in effect taken on. They also expressed concern over the leverage taken on by new borrowers for house purchases. The authorities would prefer the existing lending cap to be expressed as a ratio to value instead of collateral, and argued for the need to expand macroprudential tools to debt-and-income-based measures to better contain the growth in household debt. They emphasized the need for such caps to cover all lenders, not only banks, and include all debt, not only secured lending. They argued for more data, especially on nonbank and foreign lenders (which are not fully captured by credit statistics), and sought a positive credit registry to support monitoring of financial health.

Financial System Policies

The Finnish financial system is sound. System-wide capital ratios exceed minimum requirements by a clear margin, and leverage ratios have improved to levels above European averages (Table 6). Returns to equity and cost ratios are healthy; profitability has dipped recently, but mainly

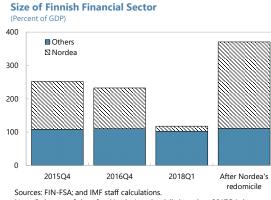
⁹ The guarantee portfolio for government housing financing has increased by around 8 percent each year from 2010 to 2017, with higher increases for subsidized loans. The government now guarantees the construction of 8,000 social apartments each year.

¹⁰ They are 2 percent for shares in housing companies, with an exemption for first time buyers, which could explain the increased share of lending to housing corporations.

because of investment (e.g. IT systems). The quality of the loan stock is very good overall, with low levels of NPLs.

20. However, some distinctive features of the Finnish financial system indicate challenges for supervision:

Financial sector size: With the relocation of the headquarters of Nordea from Sweden to Finland in October 2018, the size of the Finnish banking sector has increased¹¹ to about 3¾ times GDP once total assets of foreign subsidiaries are accounted for, one of the largest in Europe (relative to GDP). With the redomicile, the amount of covered deposits within the Finnish deposit guarantee scheme grows from around €51 billion to around €127 billion (Selected Issues Paper: Nordea). 12



- Note: Estimates of size after Nordea's redomicile based on 2017O4 data.
- Concentration: Over half of bank lending is directed to real estate (including construction and housing corporations). The Finnish real estate investment market is estimated to be worth over a quarter of GDP in 2017, one of the largest in Europe. 13
- Interconnectedness: The domestic financial system is exposed to foreign conditions; in particular, covered bonds continue to play a major role in bank funding, increasing exposure to Nordic real estate markets; many Nordic banks are also significant market makers in the covered bond market. 14 The exposure of the Finnish banking system to other Nordic economies increases with Nordea's redomicile, as the economic fluctuations will affect Nordea's assets (Selected Issues Paper: Nordea).
- Systemic branches: Danske Bank is a significant lender in Finland, but its branch activities in Finland are supervised by the Danish competent authority. 15

¹¹ Note that the increase over the 2018:Q1 value is inflated by the conversion by Nordea and Danske bank of their subsidiaries to branches in 2017. When measured against the size of the financial system in 2016, the redomicile of Nordea roughly doubles the size of the Finnish financial system (Selected Issues Paper).

¹² The maximum amount guaranteed remains €100,000. Depositors in other Nordic economies are protected up to similar amounts in euro terms.

¹³ See Bank of Finland Bulletin, May 2018.

¹⁴ See Finland: Staff Report for the 2017 Article IV Consultation, IMF Country Report No. 17/370.

¹⁵ This issue was previously noted in Finland: Financial System Stability Assessment, IMF Country Report No. 16/370, p.32. The problem is somewhat ameliorated in this case, as Danske has a Finnish subsidiary, which gives the Finnish competent authority representation in the supervisory college overseeing Danske Group.

- Digitalization: Finland is at the forefront of digitalization of financial sector services.
 Digitalization can bring benefits of new and more tailored services and efficiency gains. But it also presents risks to security of payments systems, and to borrowers that are vulnerable to misleading offers of loans, especially by entities that are not supervised or regulated (Box: Fintech and Consumer Credit).
- 21. The authorities have responded to many of the challenges posed to the system. The mission team's assessment is that the responsible authorities have responded to the challenges posed by Nordea's redomicile within the bounds of their remits.
- In particular, capital requirements for Nordea have not been weakened, as some had feared when the proposal for moving headquarters was announced. The FIN-FSA now has in its toolkit a new capital buffer—the bank-specific systemic risk buffer—in addition to G-SII and O-SII buffers. These were set for financial institutions in June 2018 and become effective in January 2019; for Nordea, the binding buffer is the 3 percent set for its systemic risk buffer. The set of the systemic risk buffer.
- The supervisory authority will increase headcount and reorganize to better supervise Nordea. The ECB and Nordic authorities have reaffirmed their commitments to information exchange and cooperation, mitigating the risks of cross-border discrepancies.
- Nordea will contribute to the Finnish deposit guarantee fund with annual deposit guarantee fees, as with all banks in Finland. (The target for the Finnish fund is 0.8 percent of covered deposits by 2024.) Nordea is also obliged to contribute to the Single Resolution Fund, like other euro area banks. No changes are expected to the single point of entry resolution strategy previously established for Nordea by the Swedish-led Supervisory College; the SRB has made decisions on MREL at the consolidated level, but decisions over e.g. subordination and intragroup MREL will be made in 2019.

22. But some issues will require more attention, including from European authorities.

• The banking union is not yet complete: banking supervision in the euro area has improved significantly following the creation of the Single Supervisory Mechanism, but bank crisis preparedness and management still face significant transitional challenges. The confirmation of a backstop for the Single Resolution Fund in June is a significant step to boosting market confidence in the resources available to support resolution, especially in systemic cases, but

¹⁶ Nordea will maintain nominal capital levels roughly constant until the ECB issues its decision in 2019. Capital ratios will fall somewhat as a result of different approaches to the use of Pilar 1 and Pilar 2 requirements under the SSM to those employed by Swedish authorities in 2017. Nonetheless, the Swedish and Finnish authorities assess that Nordea would face equivalent regulatory capital requirements. See the opinion from Sweden's Finansinspektionen dated 23 August 2018.

¹⁷ Levels for other institutions are: OP Group, 2.0 percent; Municipality Finance Plc, 1.5 percent; Aktia Bank Plc, Danske Mortgage Bank Plc, Evli Bank Plc, Handelsbanken Finance Plc, Oma Savings Bank Plc, POP Bank Group, S-Bank Ltd, Mortgage Society of Finland Group, Savings Banks Group, and Bank of Åland Plc, 1.0 percent.

- important details still need to be finalized. Establishing a common European deposit insurance scheme would increase the confidence of retail depositors, and is important for cases where liquidation would be required.
- Third-country bank branches are outside the perimeter of ECB banking supervision, creating scope for arbitrage and inconsistent supervisory treatment. The SSM should have supervisory powers over significant third-country branches operating in the euro area.¹⁸
- **23. Digitalization is a growing challenge for supervision and regulation,** owing to the rapid changes in services and platforms and the lack of data on activities of non-bank service providers. Because products are morphing quickly and across lines of supervision, approaches that stress regulation of activities might be more successful at managing prudential risks than those that regulate entities. ¹⁹ Consumer protection—such as transparency about lending terms and conditions—is an important issue.

24. Sustained efforts are needed to ensure effective supervision and enforcement of AML/CFT.

- Recent developments have raised questions about the adequacy of AML/CFT supervision across
 the European Union. Most prominently, the activities of Danske's Estonian branch over the
 period 2007 to 2013 have prompted investigations by Danish and Estonian supervisors and the
 US Department of Justice. At the time of writing, there is no specifically Finnish investigation into
 the Danske affair, but Finland's National Bureau of Investigation has received a complaint about
 Nordea's Finnish operation (then a branch) over the same period; there is no decision as yet
 whether to open an investigation.
- Responsibility over AML issues in Finland relies on several institutions. The Ministry of Finance
 and the Ministry of the Interior are mainly responsible for legislation, and the FIN-FSA supervises
 financial institutions' compliance, including Know Your Customer requirements. The Regional
 State Administrative Agency for Southern Finland (RSAA), the Finnish Patent and Register Office,
 the National Police Board and the Finnish Bar Association are tasked with AML/CFT supervision
 for other entities such as real estate agencies, external accounting services, tax advisors, and
 gambling operators. The Financial Intelligence Unit is responsible for receiving and analyzing
 suspicious transaction reports.
- Following publication of the 2013 9th Follow-Up Report of Finland's Mutual Evaluation Report by
 the Financial Action Task Force (FATF), the government amended the AML Act in 2017 by adding
 requirements for national, and supervisory-specific risk assessments and risk assessments by
 obliged entities; creating a register for beneficial owners; and adding new obligations for
 businesses to maintain information concerning their beneficial owners. FATF is currently

¹⁸ See Euro Area: Financial System Stability Assessment, IMF Country Report No. 18/226, p.20.

¹⁹ See IMF Staff Discussion Note SDN/17/05 and "Financial Stability Implications from FinTech," Financial Stability Board, June 2017.

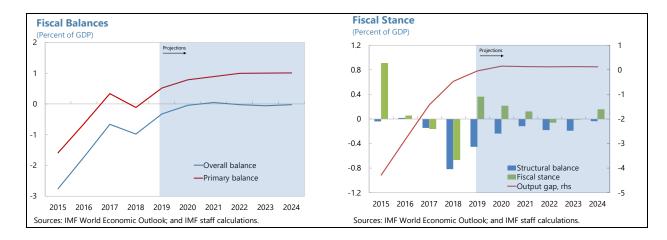
conducting an AML/CFT assessment of Finland under the revised FATF standards focusing on effective implementation of AML/CFT measures, and the report will be published in 2019.

Authorities' Views

25. The authorities assess the financial system to be sound and stable. The main risks to the banking system arise from the exposure to Nordic real estate markets and rollover risks from covered bond funding, which could escalate were there to be an increase in risk premia in global financial markets. Hiring of new supervisory staff had been successful, although demands on staff would likely remain high, especially in complicated areas such as internal models and money laundering. The SSM provides additional expertise, and cooperation among Nordic supervisory authorities continues to work well. Capital standards applying to Nordea had not been diluted with its redomicile, and system-wide capital was comfortably above regulatory minima. Owing to previous funds carrying over and Nordea contributing towards the target level, only a small amount of funds outside the current system would be necessary to collect from other banks for the Finnish deposit guarantee fund to reach its target, even with the increase in depositors covered by the Finnish scheme with Nordea's redomicile. The Finnish authorities would like a mechanism for the cases of systemically-important branches (such as the authority to set liquidity requirements).

C. Fiscal Policies

- **26.** The **2019 Budget continues the government's policies.** There are some new growthenhancing expenditure measures, worth about 0.1 percent of GDP, which aim to promote, inter alia, employment growth, R&D and education and public safety. New revenue measures (reducing taxation of earned income and an increase in excise duties) would contribute to a net decline in the revenue ratio.
- 27. Fiscal policy in 2019 is expected to become contractionary. Notwithstanding the new measures, the continuation of previous measures in the 2019 Budget implies a reduction in the deficit of about 0.7 percentage points of GDP. This is mostly accounted for by saving measures under the government's consolidation plan (estimated at about 0.3 percent of GDP), expected reductions in unemployment benefits (about 0.1 percent of GDP), and the expiration of public investment projects. With a closed output gap, the budget proposal implies a structural contraction of almost 0.4 percent of GDP, reversing the 2018 fiscal stimulus.
- **28. Over the medium term, fiscal policy is projected to remain contractionary.** A tighter fiscal stance is expected to take hold as expenditure consolidation continues beyond 2019, albeit at a slower pace (Figure 3). With a positive output gap over the medium term, the Budget implies a reduction in the structural primary balance of about 0.3 percent of GDP in 2019 and 0.1 percent of GDP thereafter. With deficits receding and output gradually converging to potential, public debt is projected to remain on a downward path (Annex 3: Debt Sustainability Analysis).



29. A moderate tightening of the fiscal stance is justified for both cyclical and structural reasons. With output projected to expand above its potential growth rate and no independent monetary policy, a continuation of 2018's procyclical fiscal stance should be avoided. Long-term sustainability considerations underscore the need to build fiscal buffers in light of looming spending pressures from age-related costs, a relatively high level of contingent liabilities, ²⁰ and the typical volatility of the economy witnessed over the past 25 years that can rapidly increase demands on the public finances. With an already-high revenue ratio, there is little scope for further increases in the tax burden (although additional efforts to improve VAT collection would help). Continuing to uphold the consolidation commitments under the Competitiveness Pact is therefore important. Unexpected savings should be allocated to either reduce the debt or to growth-enhancing expenditures, such as on infrastructure that might aid labor mobility (e.g. transportation) and measures to partially reverse recent cuts in R&D spending.

30. Progress on social services and health care reform has been slow, but should be pursued. The proposed reform to social services and health care is important to address the agerelated challenges and is a crucial component of the fiscal consolidation plan. Currently, public health and social care is provided by 190 local agencies, making it difficult to exploit economies of scale. The plan is to make provision of services more cost effective by transferring responsibility for provision of services from almost 300 municipalities to 18 newly-formed counties, with an emphasis on competition and modernization. As yet, political consensus on the reform has not been achieved. Savings will largely depend on implementation—which has been delayed again to 2021. The project is ambitious, proposing major changes to regional administration and significant commitments to complex IT systems, but is susceptible to downside risks, including cost overruns. Nonetheless, if successfully implemented, the reform could make a major contribution to fiscal sustainability, potentially increasing public sector net worth by about 65 percent of GDP.²¹

²⁰ Government guarantees are above 20 percent of GDP.

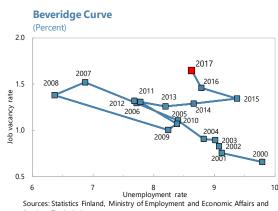
²¹ The authorities target fiscal savings of around 1.3 percentage points of GDP by 2030 through successful implementation of the reform. Given the current level of health and old-age expenditures of 11.4 percent of GDP and a projected increase from population aging of around 1.3 percent, the target would imply savings of approximately 10 percent of total health and old-age expenditures once the reform is completed. (See also Finland: Staff Report for the 2017 Article IV Consultation, IMF Country Report No. 17/370, Annex III; and Brede, Maren. and Christian Henn 2018, IMF Working Paper 18/78).

Authorities' Views

31. The authorities considered that a tighter fiscal stance is warranted to build fiscal buffers as age-related fiscal pressures loom closer. They felt that, from a "bottom-up" perspective that evaluates specific new measures, the fiscal stance in 2017 and 2018 was approximately neutral. They reiterated their commitment to closing the fiscal sustainability gap by, inter-alia, continuing the implementation of the fiscal consolidation plan and pushing forward the reform of health and social services. The potential savings from this reform are uncertain; the authorities would consider other adjustments to ensure savings are realized.

D. Structural Policies

- 32. The sustainability of the social model puts emphasis on structural policies. The model depends on high levels of employment and growth, implying a need for vibrant markets and efficient use of resources. Finland's product markets are comparatively liberalized; discussions focused mainly on areas in which labor market performance could be improved.
- 33. The labor market has had to face considerable adjustment over the past decade. Recessions have weakened employment and caused physical and human capital investment to be deferred. Major economic shocks and the financial crisis have seen substantial job losses in highproductivity manufacturing.²² These compositional effects substantially weakened productivity. Some regions were more affected than others, contributing to regional labor market disparities.
- 34. Notwithstanding recent growth, signs of underlying weaknesses remain...
- ... with respect to labor mobility. Most obviously, even with the recent substantial increase in
 - employment, the unemployment rate remains notably above Nordic peers (Figure 4). The Beveridge curve, relating unemployment rates to vacancies, has shifted out during the past three years of recovery, indicating difficulties in matching workers to job opportunities; in some sectors—notably construction and services—labor shortages have continued despite overall unemployment remaining comparatively high. Staff analysis shows that regional labor mobility is low relative to other advanced economies (Figure 6 and Annex III).

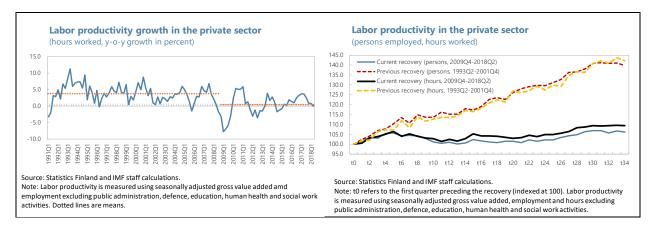


Fund staff calculations

²² Bank of Finland economists estimate that approximately 110,000 jobs were lost in manufacturing and trade since 2008. ICT's share of total output declined from 8 percent at the turn of the millennium to 3 percent currently. See Bank of Finland Bulletin 3/2018.

• ... and with respect to productivity. Labor productivity of the economy has taken until now to recover to levels reached before the onset of the global financial crisis. Productivity growth during this recovery has been slower than during the previous recovery in the 1990s. Deep structural changes in the economy associated with the impact of the crisis and Nokia's demise resulted in compositional changes across sectors, making the comparison of recoveries difficult.

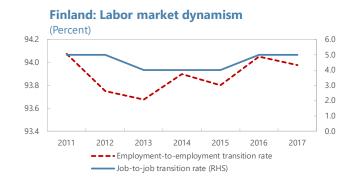
Nevertheless, analysis indicates that, within the same sector, some firms have high productivity growth, while others lag behind—and that the gap between best and worst performing firms is increasing over time.



35. These observations are consistent with weak job market dynamism, despite the recovery. Many other advanced economies have higher job-to-job mobility, which is thought to be

within an economy.²³ This appears to have been associated with low rates of regional labor migration within Finland.²⁴ Employment-to-employment transition rates have remained flat, job creation rates across sectors from 2008 to 2016 have been flat or declined slightly, while creation of new firms has declined over the same period (Figure 5).

a key mechanism by which skills are diffused



36. Some structural features could be holding back dynamism. Finland's Employment Protection Legislation is not noticeably restrictive overall, but dismissal procedures are more restrictive. ²⁵ Easing dismissal procedures is often found to have no significant effect on

²³ See Davis, Steven J. and John Haltiwanger (2014), "Labor Market Fluidity and Economic Performance," NBER Working Paper 20479.

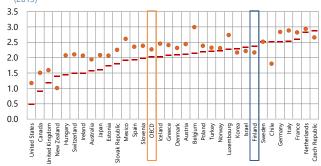
²⁴ See Tigran Poghosyan (2018), "Regional Labor Mobility in Finland," IMF Working Paper WP/18/252.

²⁵ Although protection of permanent workers against collective dismissals (justified on economic grounds) is comparable to an average OECD country, individual dismissal (such as because of misbehavior or poor performance) is more stringent.

employment—hiring is easier, but so too is firing.²⁶ However, it has been found to increase productivity and incomes.²⁷ SMEs incur proportionally larger dismissal costs compared to other firms and clauses that specify a minimum employment period on re-employment are considered a deterrent by employers.

37. The authorities have pursued several reforms in recent years to improve the functioning of the labor market.

OECD Indicators of Employment Protection Legislation (2013)



- Protection of permanent workers against individual dismissal
- Protection of permanent workers against individual and collective dismissals Source: OECD.

Note: Higher value implies that the country's EPL is comparatively stricter.

- A key ambition of the 2016 Competitiveness Pact was a move away from tripartite centralized bargaining toward coordinated sectoral bargaining with greater wage flexibility at the level of firms. However, social parties were not able to reach agreement on a formal model, and the 2017 wage negotiations were bilateral, with no formal role for the government, and not formally coordinated across sectors.²⁸
- Reforms of social benefits have aimed to decrease inactivity: tighter conditions for receiving
 unemployment benefits and a shortening of their duration became effective in January 2017²⁹;
 penalties were introduced to incentivize active job search; funds for active labor market policies
 were increased; as was the mobility allowance, to better cover part-time work; the trial period for
 new hires was extended allowing firms to better test the capabilities of new hires; conditions for
 hiring on temporary contracts were eased.
- Recently, the governing coalition and the social partners agreed on a legislative proposal
 allowing courts take into account the size of the firm when considering dismissal cases and
 reducing the period during which individually dismissed workers would not receive
 unemployment insurance from 90 to 60 days.

38. While recognizing the importance of maintaining social cohesion, staff recommends further steps to increase job market dynamism.

²⁶ See, for example, the survey in OECD (2016), "Enhancing economic flexibility: what is in it for workers?" OECD Economic Policy Paper No. 19.

²⁷ See Autor, David, William Kerr and Adriana Kugler (2007), "Does employment protection reduce productivity? Evidence from US states," *The Economic Journal* 117(521), pp.F189–217.

²⁸ In practice, export-oriented sectors settled first, influencing the negotiations that followed for other sectors.

²⁹ This has been estimated to have resulted in a decrease of unemployment duration by 10 percent and fiscal savings of more than € 100 million—see "OECD Economic Surveys: Finland 2018," OECD: Paris.

- Enhancing the ability to differentiate wages at the firm level is important to increase incentives for job-to-job transitions and foster regional labor mobility, clearing the job market more rapidly and facilitating the transfer of skills. Experience from other countries indicates that this is compatible with formal representation of labor and employers. ³⁰ As it stands, about 25 percent of employees that work for non-organized employers, mostly SMEs, cannot bargain locally but are instead bound by sectoral agreements.
- There is room for further progress to improve incentives from social benefits. Job search
 intensity tends to increase sharply toward the end of benefit time limits; tapering benefits to
 gradually fall with duration could improve job search (Figure 4). A tripartite working group was
 setup to assess the effectiveness of recently introduced measures to incentivize job search of
 unemployed by Spring 2019.
- Other policies may need to be addressed to improve regional job mobility. Staff analysis finds a significant role for housing market variables. The authorities have already implemented measures to expand housing supply in urban areas, and the government provides mobility allowances to compensate for housing cost differentials across regions. But there is scope to improve transport infrastructure around growth regions to incentivize commuting and reduce demand pressures from centrally located properties. The gradual decline in mortgage interest deductibility to 25 percent in 2019 would mitigate debt-financed ownership incentives.

Authorities' Views

39. The authorities agreed on the need to continue structural reforms, but highlighted challenges associated with enhancing labor market dynamism. Past reforms have been bearing fruit: competitiveness has been restored and the labor market recovery has exceeded expectations. Nevertheless, labor productivity growth remains subdued and has not recovered as fast as in previous upswings. Modest labor mobility across regions can be explained by, inter alia, the geographical dispersion of the population, high home ownership rates, and less liquid real estate markets in rural areas. There is scope to reform social benefits to enhance labor incentives and labor market dynamism further, but social safety nets should be maintained. Regional governance reforms and greater reliance on outsourcing are expected to improve the effectiveness of active labor market policies.

STAFF APPRAISAL

40. Good economic performance continues, but growth is likely to slow. Finland is enjoying its third consecutive year of economic recovery, and the unemployment rate has declined to its lowest level since 2011. Growth in 2018 is expected to be 2.4 percent. But it is likely to slow next year as global demand slows and financial conditions tighten. There are downside risks to this

³⁰ Framing the alternatives for the labor market as simply between organized and unorganized labor misses important distinctions. In a recent study, the OECD found that centralized bargaining systems are associated with lower productivity growth. "Organized decentralization"—in which sector-level agreements set broad targets while firm-level negotiations set detailed terms—are associated with higher employment, productivity, and wages. See "The role of collective bargaining systems for good labour market performance" in OECD Employment Outlook 2018.

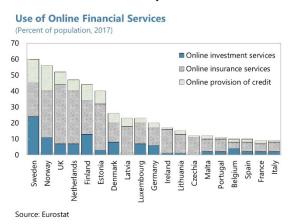
outlook, such as from an increase in trade protectionism. And over the long term, growth is likely to be lower than what has been seen recently, unless productivity growth permanently increases.

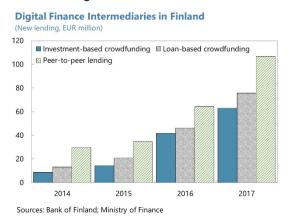
- **41. Hence, the challenge is to make the economy more dynamic.** Recent reforms have made Finnish exports more cost competitive and helped to boost employment. But the job is not yet done: unemployment rates remain persistently high in some regions despite ample vacancies in others, productivity growth is still below what was seen before the crisis, despite the strength of the recovery, and external balances remain moderately weaker than would be desirable for an economy with an aging population.
- **42.** The focus of reforms should be on increasing labor market dynamism while maintaining a strong safety net. This means more flexibility about setting wages at the firm level and changing unemployment benefits to increase job search soon after losing employment. Other policies may be needed to aid regional labor mobility.
- **43. Because growth is likely to slow, there is a need to continue to rebuild fiscal buffers.** The 2019 budget implies a moderate tightening; going forward, fiscal policy should concentrate on raising the effectiveness of public spending, alongside policies to boost potential growth.
- **44. The financial system is sound.** The authorities should continue to keep a close eye on banks' exposures to real estate. The size of the banking sector has increased substantially with the recent redomicile of Nordea to Finland, which increases demands on supervision and heightens the importance of continued close regional cooperation and preparedness for crises.
- **45. Extra measures to protect borrowers are needed.** The authorities should be given more macroprudential tools and access to better data, such as from a comprehensive positive credit registry. The growth in consumer credit raises the question of whether some borrowers are sufficiently informed about the conditions of their loans—extra consumer protection measures should be considered.
- 46. It is proposed that the next Article IV consultation with Finland be held on the standard 12-month cycle.

Box 1. Fintech and Consumer Credit

"Fintech" is an appellation for a broad and fluid set of technology-enabled innovations in finance. These advances are creating new opportunities for consumers and service providers while also setting new challenges for regulators. While much attention has been given recently to the implications for regulation of increased operational risks (e.g. from changes to payments systems and from cyber risks),¹ there are important implications from new developments in consumer lending.

Whereas credit has usually been intermediated by banks, electronic platforms now enable borrowers to be matched directly with investors. Finland, one of the most digitized economies in the world, is a natural environment for such developments. Data are sparse, but suggest that "peer-to-peer" (P2P) lending and related practices are expanding very rapidly. According to survey data, the online market has almost quintupled in size between 2014 and 2017 and is now the fifth largest market for digital finance in Europe after the UK, France, Germany and the Netherlands in terms of lending volumes.²





In principle, P2P lending can improve the market for consumer credit: it can increase competition and financial inclusion, and create tailored products that better match borrowers' needs. An increase in the share of P2P lending could reduce risks arising from concentration in bank intermediation and possibly make credit creation more resilient and less susceptible to business cycles, to the extent that P2P lending has lower maturity mismatches. However, credit risk could be increased, as there is no regulatory capital to back such lending, no access to central bank liquidity, and credit risk models are untested.³

A pressing challenge is monitoring: P2P lending is not captured in official credit statistics nor conventional credit registries, meaning that central banks and regulators cannot accurately measure the impact of P2P lending on the real economy, evaluate its role in the transmission of monetary policy, or assess risks to lenders and borrowers. Monitoring cross-border payments is especially difficult. A second challenge is regulation—because the field is changing so quickly, regulation of activities is likely to prove more successful than regulation of entities. Emerging issues include consumer protection and risk assessment and disclosure, as well as enforcement of KYC regulations to prevent money laundering. Regulatory arbitrage across jurisdictions is likely to exacerbate these issues without enhanced regional cooperation.

¹See "Fintech and Financial Services: Initial Considerations," IMF Staff Discussion Note SDN/17/05.

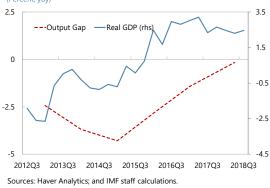
²See "3rd European Alternative Finance Industry Report," Cambridge Centre for Alternative Finance 2018.

³See "Financial Stability Implications from FinTech," Financial Stability Board June 2017.



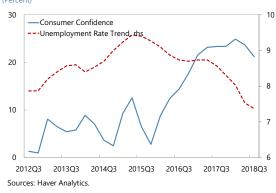
The economy is growing, eroding spare capacity....

Real GDP and Output Gap (Percent, yoy)



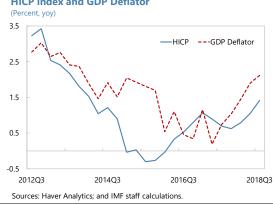
Declining unemployment and elevated consumer confidence should support consumption...

Consumer Confidence Indicator and Unemployment Rates



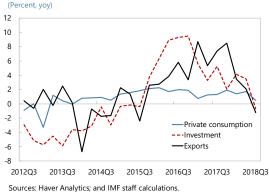
Measures of domestic inflation have edged up somewhat...

HICP index and GDP Deflator



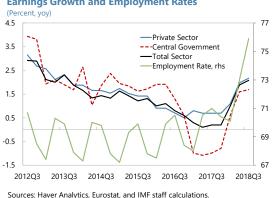
Investment and exports provided a strong impulse

Private Consumption, Investment and Exports



...as earnings and employment are growing again

Earnings Growth and Employment Rates



...but core inflation remains below the euro area's

HICP Excl. Energy and Unprocessed Food

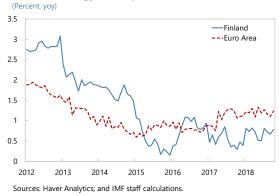
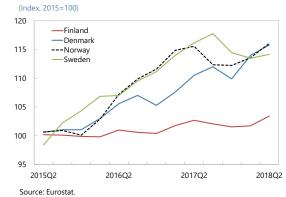


Figure 2. Finland: House Prices

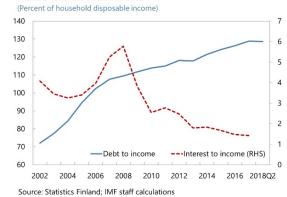
House prices in Finland have increased modestly, especially in comparison to Nordic peers.

House Prices in Nordic Countries



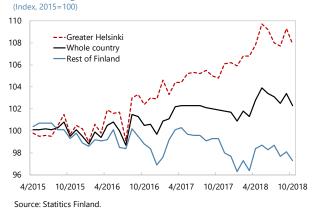
Debt to income has increased while affordability has been maintained with lower rates...

Household Debt in Finland



Price increases have been driven by those in metropolitan Helsinki.

Finland: Regional House Prices



...with the share of highly leveraged households remaining roughly the same.

Share of Mortgage Debt by Household DTI Ratio

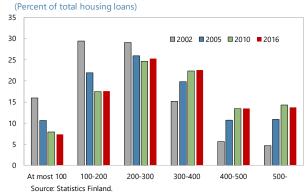
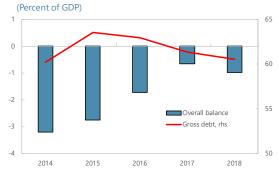


Figure 3. Finland: Fiscal Developments

Fiscal balances have improved along with the recovery, putting debt on a downward path ...

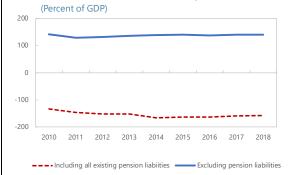
General Government Balance



Sources: Finish authorities and IMF staff estimates.

However, public sector net worth is increasingly negative...

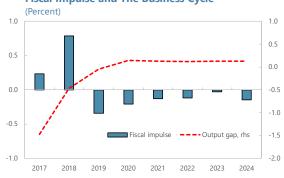
Public Sector Static Net Worth, 2000-18



Sources: Finish authorities and IMF staff

While fiscal policy has turned expansionary, it is expected to be swiftly reversed ...

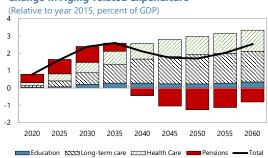
Fiscal Impulse and The Business Cycle



Sources: Finish authorities and IMF staff estimates.

... as large old-age expenses loom in the future

Change in Aging-related Expenditure



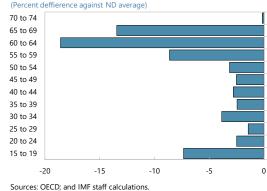
Sources: Finnish Ministry of Finance (2017).

Note: Estimates account for the 2017 pension reform, but exclude the prospective health and social services reform.

Figure 4. Finland: Labor Force Participation and Unemployment

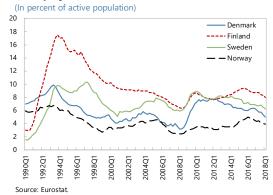
Labor force participation in Finland lags that of Nordic peers for both men ...

Finland: Labor Participation Rates, Men, 2017



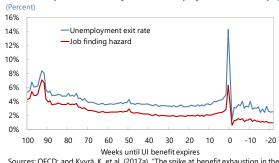
The unemployment rate is higher than that of Nordic peers ...

Unemployment Rate in Nordic Countries



... still generous unemployment insurance ...

Exit Rates Spike Immediately Before Unemployment Benefit Expiry

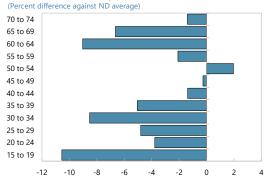


Sources: OECD; and Kyyrä, K. et al. (2017a), "The spike at benefit exhaustion in the Finnish labor market", VATT Working Papers, No. 86, Helsinki.

Note: Unemployment and job finding rates as a function of time-to-exhaustion for all those entitled to unemployment insurance.

... and women (except 50-54 years old).

Finland: Labor Participation Rates, Women, 2017

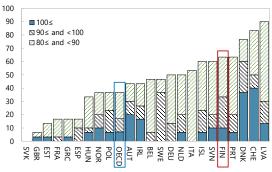


Sources: OECD; and IMF staff calculations.

... supported by relatively high incidence of unemployment traps ...

Work Does Not Always Pay

(Incidence of unemployment traps)

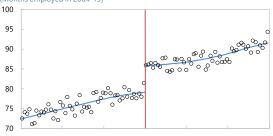


Source: OECD.

... and the "unemployment tunnel."

Employment by Birth Week

(Months employed in 2004-13)



Jan/1949 May/1949 Sep/1949 Jan/1950 May/1950 Sep/1950

Sources: Kyyrä, K. and H. Pesola (2017), "Long-term effects of extended unemployment benefits for older workers", *VATTWorking Papers*, No. 89, Helsinki. Note: The unemployment tunnel age threshold was increased from 55 to 57 years in 2005, only applicable to individuals born after 1949.

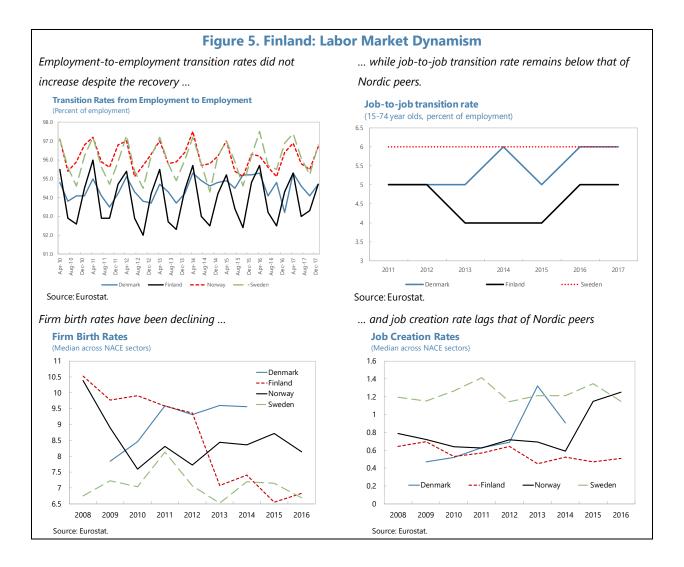
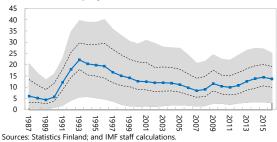


Figure 6. Finland: Regional Labor Mobility

Unemployment rate varies widely across regions ...

Finland: Unemployment Rates

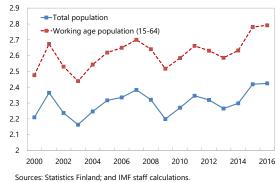


Note: The sample includes 70 NUTS 2 regions over the period 1987-2016. The blue line represents Finland as a whole. Unemployment rate is calculated using data on unemployed job seekers registered at the employment services (link). The shadow range represents minimum and maximum across regions. The dotted lines represent 10-90 percentile intervals.

driven by modest out-migration ...

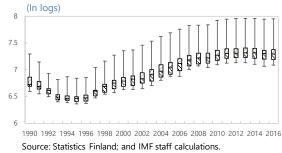
Gross Labor Mobility

(Percent of respective population group)



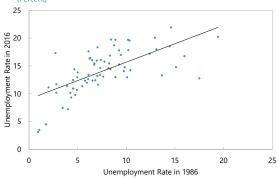
Regional house price dispersion has widened, hampering regional labor mobility ...

Finland: House Prices



... and is highly persistent ...

Unemployment Rates in 1986 vs 2016

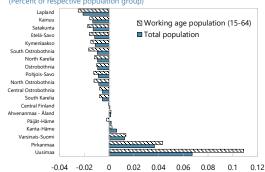


Sources: Statistics Finland; and IMF staff calculations.

... mostly from rural north to urban south.

Net Labor Mobility

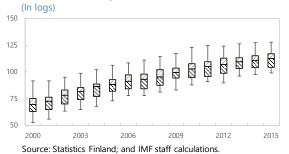
(Percent of respective population group)



Sources: Statistics Finland; and IMF staff calculations.

... while regional wage dispersion remained stable, providing little incentive for mobility.

Finland: Real Wages



						Proj.			
		(F	Percentag	e change	, unless c	otherwise	indicatea)	
Output and demand (volumes)	2.5	2.0	2.4	1.0	17	1.4	1.2	1.2	4.7
GDP	2.5	2.8	2.4	1.9	1.7	1.4	1.3	1.3	1.3
Domestic demand	3.1	2.1	2.3	1.8	1.7	1.3	1.2	1.2	1.2
Private consumption	2.0	1.3	2.1	1.8	1.3	1.1	1.1	1.1	1.1
Public consumption	1.8	-0.5	1.5	1.0	1.8	1.0 2.0	0.7 2.0	0.7	0.7
Gross fixed capital formation Change in stacks (contribution to growth in persent of CDR)	8.5 -0.2	4.0 0.1	3.7 0.0	3.0 0.0	2.4 0.0	0.0	0.0	2.0 0.0	2.0 0.0
Change in stocks (contribution to growth in percent of GDP) Exports of goods and services	3.9	7.5	3.2	3.3	3.1	3.1	3.0	3.0	3.0
Imports of goods and services	5.6	3.5	3.0	3.0	3.0	3.0	3.0	3.0	3.0
Net exports (contribution to growth in percent of GDP)	-0.6	1.4	0.2	0.1	0.1	0.1	0.0	0.0	0.
Prices, costs, and income									
Consumer price inflation (harmonized, average)	0.4	0.8	1.2	1.4	1.6	1.8	1.9	2.0	2.
Consumer price inflation (harmonized, end-year)	1.1	0.5	1.5	1.5	1.6	1.8	1.9	2.0	2.
GDP deflator	0.6	0.8	1.6	1.6	1.8	1.8	1.9	2.0	2.
Unit labor cost, manufacturing	-2.7	-6.9	-0.8	0.0	0.4	0.4	0.5	0.6	0.
abor market									
Labor force	-0.2	8.0	0.3	0.6	0.5	0.3	0.1	0.1	0.
Employment	0.5	1.0	1.4	0.9	0.6	0.4	0.2	0.1	0.
Unemployment rate (in percent)	8.8	8.6	7.6	7.3	7.1	7.0	6.9	6.9	6.
Potential output and NAIRU									
Output gap (in percent of potential output) ¹	-2.8	-1.5	-0.5	0.0	0.2	0.1	0.1	0.1	0.
Growth in potential output	1.0 1.4 1.4 1.5 1.5 1.4 1.3 1.3								
				(Per	cent of G	DP)			
General government finances ²	17	0.7	1.0	0.2	0.0	0.1	0.0	0.1	0
Overall balance	-1.7	-0.7	-1.0	-0.3	0.0	0.1	0.0	-0.1	0.
Primary balance ³	-0.6	0.3	-0.1	0.5	0.8	0.9	1.0	1.0	1.
Structural balance (in percent of potential GDP)	0.0	-0.1	-0.8	-0.5	-0.2	-0.1	-0.2	-0.2	0.
Structural primary balance (in percent of potential GDP) ³	1.1	8.0	0.0	0.4	0.6	0.7	0.8	0.9	1.
Gross debt	63.0	61.3	60.5	59.8	58.8	58.4	56.6	54.9	53.
Net debt ⁴	-53.3	-58.6	-55.3	-53.1	-51.2	-49.6	-48.1	-46.5	-45.
Annon and interest nates					(Percent)				
Money and interest rates M3 (Finnish contribution to euro area , growth rate, e.o.p.)	1.8	6.1							
Finnish MFI euro area loans (growth rate, e.o.p.)	1.4	2.6		•••	•••			•••	
Domestic nonfinancial private sector credit growth (e.o.p.)	-2.6	2.4	4.8	4.6	4.6	4.5	4.3	4.0	3.
3-month Euribor rate (percent)	-0.3	-0.3	4.0	4.0	4.0	4.5	4.5	4.0	٥.
10-year government bonds yield	0.4	0.5							
,				(Percent of GDP)					
National saving and investment				(, c,	0, 0	2. /			
Gross national saving	21.3	22.1	22.5	23.2	23.6	23.8	24.1	24.2	24.
Gross domestic investment	22.0	22.8	23.0	23.1	23.1	23.2	23.2	23.3	23.
Balance of payments									
Current account balance	-0.7	-0.7	-0.5	0.1	0.5	0.6	8.0	0.9	1.
Goods and services balance	-1.0	0.3	0.4	0.7	8.0	0.9	0.9	1.0	1.
Net international investment position	8.6	2.4	2.6	2.7	3.1	4.7	5.5	6.4	7.
Gross external debt	195.0	182.2	185.6	188.9	191.9	194.9	198.0	200.4	202.
exchange rates (period average)									
Euro per US\$	0.90	0.89							
Nominal effective rate (appreciation in percent)	2.0	0.9							
Real effective rate (appreciation in percent) ⁵	1.2	-0.4		•••			•••		
Memorandum items Nominal GDP (in Euro billions)	216.1	223.9							

Sources: Bank of Finland, BIS, International Financial Statistics, IMF Institute, Ministry of Finance, Statistics Finland, and Fund staff calculations.

¹ A negative value indicates a level of actual GDP that is below potential output.

² Fiscal projections include measures as specified in the General Government Fiscal Plan.

³ Adjusted for interest expenditure.

⁴ Defined as the negative of net financial worth (i.e., debt minus assets).

⁵ CPI-based real effective exchange rate.

		2017	2018	2019	2020	2021	2022	2023	2024	
	2016	2017	2010	2019	2020	Proj.	2022	2023	2024	
Billions of euros										
Current account	-1.6	-1.5	-1.2	0.3	1.2	1.5	2.3	2.6	2.8	
Goods and services	-2.2	0.7	1.0	1.6	2.0	2.2	2.5	2.6	2.7	
Exports of goods and services	77.5	86.2	89.3	92.8	96.1	99.1	102.5	105.9	108.	
Goods	53.2	59.7	61.8	64.2	66.5	68.6	71.0	73.3	75.	
Services	24.3	26.5	27.5	28.6	29.6	30.5	31.6	32.6	33.	
Imports of goods and services	79.7	85.6	88.4	91.2	94.1	96.9	100.0	103.3	105.	
Goods	52.9	58.0	60.0	62.0	63.9	65.8	67.9	70.1	71.	
Services	26.9	27.6	28.4	29.2	30.2	31.1	32.1	33.2	33.	
ncome	0.6	-2.2	-2.1	-1.3	-0.8	-0.7	-0.3	-0.1	0.	
o/w Investment income	0.6	-2.2	-2.1	-1.3	-0.8	-0.7	-0.3	-0.1	0.	
Capital and financial account	-12.4	-4.5	-0.8	0.7	1.6	2.0	2.7	3.0	3	
Capital account	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0	
Financial account	-12.5	-4.7	-1.0	0.5	1.4	1.8	2.5	2.8	3	
Direct investment ¹	12.4	-1.8	12.5	11.5	11.6	11.6	11.6	10.6	9	
In Finland	4.4	13.0	0.0	0.7	0.7	0.7	0.7	1.7	2	
Abroad	16.8	11.1	12.5	12.2	12.3	12.3	12.3	12.3	12	
Portfolio investment	-0.8	4.8	-1.7	-0.4	0.2	-0.3	0.3	0.5	-0	
Financial derivatives	-1.0	-8.1	-4.1	-2.0	-1.0	-0.5	-0.3	-0.1	-0	
Other investment	-23.7	0.8	-7.8	-8.5	-9.4	-9.0	-9.1	-8.1	-6	
Assets	-24.5	11.1	10.8	10.5	10.2	9.9	9.6	9.3	9	
Liabilities	-0.8	10.2	18.6	19.0	19.5	18.8	18.7	17.4	15	
Reserve assets	0.6	-0.4	0.0	0.0	0.0	0.0	0.0	0.0	0	
Net errors and omissions	-11.0	-3.4	0.0	0.0	0.0	0.0	0.0	0.0	0	
					cent of GI					
	0.7	0.7	0.5				0.0	0.0	1	
Current account Goods and services	-0.7 -1.0	-0.7 0.3	-0.5 0.4	0.1 0.7	0.5 0.8	0.6 0.9	0.8 0.9	0.9 1.0	1	
	35.9	38.5	38.3	38.4	38.4	38.4	38.5	38.5	38	
Exports of goods and services Goods	24.6	36.3 26.7	26.5	26.6	26.6	26.6	26.6	26.6	26	
Services	11.2	11.8	11.8	11.8	11.8	11.8	11.8	11.8	11	
Imports of goods and services	36.9	38.2	37.9	37.8	37.6	37.5	37.5	37.5	37	
Goods	24.5	25.9	25.7	25.7	25.6	25.5	25.5	25.5	25	
Services	12.4	12.3	12.2	12.1	12.1	12.1	12.1	12.0	11	
o/w Investment income	0.3 0.3	-1.0 -1.0	-0.9 -0.9	-0.5 -0.5	-0.3 -0.3	-0.3 -0.3	-0.1 -0.1	0.0 0.0	0	
Capital and financial account Capital account	-5.7 0.1	-2.0 0.1	-0.3 0.1	0.3 0.1	0.6 0.1	0.8 0.1	1.0 0.1	1.1 0.1	1	
Financial account	-5.8	-2.1	-0.4	0.1	0.1	0.1	0.1	1.0	1	
Direct investment ¹	-5.6 5.7	-2.1 -0.8	-0.4 5.4	4.7	4.6	4.5	4.3	3.8	3	
Portfolio investment	5. <i>1</i> -0.4	-0.8 2.1	5.4 -0.7	4. <i>7</i> -0.2			4.3 0.1	3.8 0.2	-0	
	-0.4 -0.4				0.1	-0.1		0.2	-0	
Financial derivatives		-3.6	-1.7 -2.2	-0.8 -3.5	-0.4 -3.7	-0.2	-0.1			
Other investment Reserve assets	-11.0 0.3	0.4 -0.2	-3.3 0.0	-3.5 0.0	-3.7 0.0	-3.5 0.0	-3.4 0.0	-2.9 0.0	-2 0	
Net errors and omissions	-5.1	-0.2 -1.5	0.0	0.0	0.0	0.0	0.0	0.0	0	
SDP at current prices (bln euros)	-5. I 216.1	223.9	233.0	241.4	250.1	258.2	266.4	275.2	284	

Sources: Bank of Finland, Statistics Finland, and Fund staff calculations.

¹ Large inward FDI flows in 2014 and 2015 are mainly due to large mergers and acquisitions (M&A) in those years such as Microsoft's purchase of Nokia's handset business (worth 2.6 percent of GDP) and various M&A deals in the energy, manufacturing and shipbuilding sectors worth more than 0.5 percentage points of GDP each.

Table 3. Finland: International Investment Position, 2008–2017 (Percent of GDP) 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 235.1 275.9 326.5 371.8 363.5 319.1 347.2 338.5 327.4 278.1 Assets Direct investment 62.4 68.0 75.1 68.1 72.8 61.8 63.5 68.0 68.4 67.0 97.5 148.1 142.5 Portfolio investment 67.6 114.8 106.9 120.1 123.8 139.0 146.1 78.6 Equity & investment fund shares 23.5 39.5 52.7 44.6 53.0 58.8 68.1 73.5 84.1 58.0 69.5 58.4 Debt securities 44.1 62.1 62.4 67.1 65.0 71.0 72.6 Fin. deriv. (other than reserves) 48.1 44.8 57.9 93.7 67.9 41.9 60.8 46.2 41.4 9.2 Other investment 53.9 61.2 74.9 99.0 98.6 82.4 81.3 78.3 65.3 54.2 Reserve assets 4.4 4.2 4.0 4.4 4.6 3.9 Liabilities 350.4 337.1 318.8 239.7 272.7 310.0 356.7 351.8 315.3 275.8 50.6 Direct investment 50.9 50.7 54.7 52.0 46.8 52.4 57.8 54.1 55.0 129.8 148.5 85.7 106.8 110.9 103.2 120.7 142.0 141.7 137.4 Portfolio investment 36.0 39.9 39.0 26.3 31.7 40.4 44.4 49.2 52.6 55.6 Equity & investment fund shares 89.1 97.6 99.4 Debt securities 49.7 66.9 71.9 77.0 89.0 89.3 81.8 Fin. deriv. (other than reserves) 48.0 43.6 55.2 89.8 63.6 39.5 57.3 44.9 40.0 8.8 71.6 99.2 98.6 85.9 83.0 74.6 Other investment 55.1 89.2 113.1 115.5

16.5

20.4

3.9

2.7

-14.2

15.1

17.4

3.7

4.0

-14.1

11.7

20.8

-0.6

4.2

-16.9

3.9

20.2

-6.0

2.5

-16.8

-3.2

9.4

-3.0

3.4

-17.3

1.5

5.7

-2.4

1.3

-7.5

8.6

6.4

1.4

-17.7

13.8

2.4

13.4

5.1

0.4

-20.4

Sources: Statistics Finland and Fund staff calculations.

Net International Investment Position

Fin. deriv. (other than reserves)

Direct Investment

Other Investment

Portfolio Investment

Note: Changes to the NIIP since the 2014 Article IV are mainly due to the switch to the BPM6 statistical standard.

-4.6

11.5

-18.1

0.1

-1.2

3.2

17.3

-9.3

1.2

-10.5

	of GDF 2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
						Pro	oj.			
Revenue	54.4	54.2	53.3	51.9	51.8	51.6	51.7	51.7	51.7	51.7
Tax revenues	31.1	31.1	31.1	30.2	30.4	30.1	30.0	30.0	30.0	30.0
Taxes on production and imports	14.2	14.4	14.1	13.9	13.8	13.6	13.4	13.4	13.4	13.4
Current taxes on income, wealth, etc.	16.6	16.5	16.6	16.0	16.3	16.2	16.3	16.3	16.3	16.3
Capital taxes	0.3	0.2	0.4	0.3	0.3	0.3	0.3	0.3	0.3	0.3
Social contributions	12.9	12.9	12.2	12.0	11.7	11.9	11.8	11.8	11.8	11.8
Grants	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Other revenue	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
	F7.4	55.0	540	52.0	F2.4	54.6	547	547	540	54.7
Expenditure	57.1 56.8	55.9	54.0	52.8 52.2	52.1 51.7	51.6	51.7 51.6	51.7 51.7	51.8	51.7 51.7
Expense Compensation of employees	13.9	55.5 13.3	53.4 12.5	12.2	12.0	51.4 11.8	11.7	11.7	51.8 11.7	11.7
Use of goods and services	11.0	11.0	10.7	10.6	10.5	10.6	11.7	11.7	11.7	11.0
Consumption of fixed capital (CFC)	3.5	3.5	3.4	3.4	3.4	3.4	3.5	3.5	3.5	3.5
Interest	1.2	1.1	1.0	0.9	0.8	0.8	0.8	1.0	1.1	1.0
Subsidies	1.4	1.2	1.2	1.2	1.1	1.1	1.0	1.0	1.0	1.0
Grants	1.3	1.3	1.3	1.3	1.3	1.3	1.2	1.2	1.2	1.2
Social benefits	22.6	22.4	21.9	21.4	21.2	21.1	21.0	21.0	21.0	21.0
Other expense	2.0	1.8	1.4	1.4	1.3	1.3	1.3	1.3	1.3	1.3
Net acquisition of nonfinancial assets	0.3	0.4	0.5	0.6	0.4	0.3	0.1	0.0	0.0	0.0
Net operating balance	-2.4	-1.3	-0.1	-0.4	0.0	0.2	0.1	0.0	0.0	0.0
Net lending/borrowing	-2.8	-1.7	-0.7	-1.0	-0.3	0.0	0.1	0.0	-0.1	0.0
Net acquisition of financial assets	0.8	-0.5	4.1							
Currency and deposits	2.6	-0.6	1.3							
Securities other than shares	-0.5	-1.4	-0.4							
Loans	-0.2	-0.6	-1.1							
Shares and other equity	-1.2	2.4	2.3							
Financial derivatives	0.0	0.0	0.0							
Other accounts receivable	0.1	-0.3	2.0							
Net incurrence of liabilities	3.6	1.2	4.9							
Special Drawing Rights (SDRs)	0.0	0.0	0.0							
Currency and deposits	0.0	0.0	0.0							
Securities other than shares	2.0	8.0	1.2							
Loans	1.4	0.1	-0.4							
Shares and other equity	0.0	0.0	0.0							
Financial derivatives	-0.4	-0.2	2.4							
Other accounts payable	0.6	0.6	1.7							
Memorandum items:										
Primary balance ¹	-1.6	-0.6	0.3	-0.1	0.5	8.0	0.9	1.0	1.0	1.0
Structural balance (in percent of potential GDP)	0.0	0.0	-0.1	-0.8	-0.5	-0.2	-0.1	-0.2	-0.2	0.0
Structural primary balance (in percent of potential	1.1	1.1	0.8	0.0	0.4	0.6	0.7	0.8	0.9	1.0
Central government net lending/borrowing	-3.0	-2.7	-1.8	-1.8	-1.0	-0.9	-0.7	-0.8	-0.9	-0.8
General government gross debt	63.5	63.0	61.3	60.5	59.8	58.8	58.4	56.6	54.9	53.2
General government net debt ²	-53.3	-53.3	-58.6	-55.3	-53.1	-51.2	-49.6	-48.1	-46.5	-45.0
Central government gross debt	54.1	53.6	52.3	51.7	51.0	50.2	50.0	48.3	46.8	45.4
Output gap (percent of potential GDP)	-4.3	-2.8	-1.5	-0.5	0.0	0.1	0.1	0.1	0.1	
Output gap (percent of potential GDP)	-4.3	-2.8	-1.5	-0.5	0.0	U. I	0.1	U. I	U. I	0.1

 $Sources: Eurostat, Government\ Finance\ Statistics,\ International\ Financial\ Statistics,\ Ministry\ of\ Finance,\ and\ Fund\ staff.$

 $^{^{\}rm 1}\,{\rm Adjusted}$ for interest expenditure.

 $^{^{2}}$ Defined as the negative of net financial worth (i.e., debt minus assets; excludes all pension liabilities).

(P	ercent of	f GDP)						
(1	2010	2011	2012	2013	2014	2015	2016	2017
Assets	247.4	261.5	269.3	255.1	258.3	278.0	278.5	278.3
Nonfinancial	86.5	85.8	88.5	88.6	87.3	84.9	84.6	83.6
General Government	73.1	72.5	74.8	75.9	76.7	76.0	74.9	73.9
Public Corporations and Central Bank	13.5	13.3	13.7	12.7	10.5	9.0	9.7	9.7
Financial	160.9	175.8	180.9	166.4	171.0	193.0	193.9	194.7
General Government	117.7	105.9	113.3	117.5	125.3	128.0	128.5	129.6
Currency and Deposits	8.3	9.1	8.2	7.3	6.4	9.0	8.2	8.
Debt Securities	21.0	20.8	21.1	20.9	21.2	21.1	19.6	18.3
Loans	14.7	13.4	15.2	15.4	15.3	14.7	13.8	12.8
Equity and investment fund shares	67.8	56.9	63.0	69.6	76.3	77.3	82.1	85.4
Insurance, pension and standardized guarantees	0.1	0.0	0.0	0.0	0.1	0.1	0.1	0.
Financial derivatives and stock options	1.2	0.9	1.2	1.1	1.1	1.0	0.9	1.0
Other accounts receivable	4.7	4.6	4.7	3.3	4.5	4.3	4.1	3.
Public Corporations and Central Bank	43.2	69.9	67.6	48.9	45.8	65.1	65.3	65.
Liabilities	105.7	133.2	137.8	118.7	119.8	138.4	140.4	138.
General Government	55.9	57.1	63.8	64.5	71.4	74.1	75.0	73.
Currency and Deposits	0.4	0.4	0.3	0.3	0.4	0.4	0.4	0.4
Debt Securities	41.3	42.5	46.3	46.2	52.5	54.0	54.2	51
Loans	7.8	9.3	12.1	12.6	13.4	14.5	14.2	13.
Equity and investment fund shares	0.3	0.3	0.3	0.3	0.3	0.2	0.2	0.
Insurance pension and standardized guarantee schemes	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.
Financial Derivatives	0.6	-0.7	-0.8	0.1	-0.5	-0.9	-0.3	0
Other accounts payable	5.6	5.3	5.6	5.6	5.4	6.2	6.7	8.3
Public Corporations and Central Bank	49.8	76.1	74.0	54.2	48.4	64.4	65.4	64.
Existing pension liabilities 1/	274.9	274.8	283.1	288.5	304.6	303.2	301.1	298.
To public sector employees	94.7	93.9	96.4	97.7	105.1	104.1	103.3	102.
To private employees	180.2	180.9	186.7	190.8	199.5	199.1	197.8	196.
Public Sector Net Financial Worth								
Excluding pension liabilities	55.2	42.6	43.0	47.7	51.2	54.6	53.4	56.
Including existing pension liabilities to public employees	-39.6	-51.3	-53.3	-50.0	-53.9	-49.4	-49.9	-45.
Including existing pension liabilities to all employees	-219.8	-232.2	-240.0	-240.7	-253.4	-248.5	-247.7	-242.
Public Sector Net Worth								
Excluding pension liabilities	141.7	128.4	131.5	136.4	138.5	139.6	138.0	140.
Including existing pension liabilities to public employees	47.0	34.4	35.1	38.7	33.4	35.5	34.7	37.
Including existing pension liabilities to all employees	-133.2	-146.4	-151.6	-152.1	-166.1	-163.6	-163.1	-158.

Source: Brede and Henn, forthcoming. "Finland's Public Sector Balance Sheet: A Novel Approach to the Analysis of Public Finance," IMF Working Paper.

Note: Public sector corporations include the largest 9 enterprises controlled by the Central Government. These account for over 90 percent of assets of Central Government controlled corporations. However, local government controlled corporations are not covered due to data limitations.

1/ This is the net present value of already-accrued liabilities for work performed in the past, based on data (and discount rates) of the Finnish Centre for Pensions (ETK), except for 2016, which are Fund Staff estimates. These pension liabilities represent a contractual obligation to public sector employees. For private sector employees, rules governing the pension system could potentially be altered to change the present value of payouts.

Table 6. Finland: Financial Soundness Indicators for the Banking Sector, 2012–2018

	2012	2013	2014	2015	2016	2017	2018	Latest Obs.
Households								
Total household debt (in percent of GDP)	62.3	62.8	64.4	65.7	66.0	66.3	65.9	March 2018
Total household debt (in percent of disposable income)	118.1	117.8	121.5	124.2	126.2	128.4	127.2	March 2018
Household interest expenses (in percent of disposable income)	2.5	1.9	2.0	1.8	1.6	1.7	1.7	March 2018
Financial assets/GDP	117.4	125.4	130.9	134.2	135.9	137.1	135.3	March 2018
Non-financial corporations								
Gross debt (in percent of GDP) ¹	77.7	76.5	77.2	81.1	76.6	71.6	72.3	March 2018
Government								
General government debt (EMU definition, in percent of GDP)	53.9	57.5	61.9	66.6	68.1	68.7	67.6	March 2018
Central government debt (in percent of GDP)	48.1	49.8	52.3	54.1	53.6	52.3	51.0	March 2018
Banking sector								
Total assets (in billions of euro)	496.2	455.3	508.6	475.8	419.0	185.1	162.8	June 2018
in percent of GDP	248.3	223.9	247.5	227.0	193.9	82.7	72.1	June 2018
Total deposits (in billions of euro)	135.7	139.4	135.4	141.7	140.2	98.1	84.4	June 2018
in percent of GDP	67.9	68.6	65.9	67.6	64.9	43.8	37.4	June 2018
Credit to nonfinancial and housing corporations (annual percent change, e.o.p.)	4.8	6.1	5.1	5.2	4.7	4.6	4.6	July 2018
Credit to nonfinancial corporations (annual percent change, e.o.p.)	2.5	3.9	2.0	3.2	2.0	1.3	3.9	July 2018
Credit to households (percent change, e.o.p.)	4.9	2.2	1.9	2.6	2.4	2.7	1.2	July 2018
Housing loans in percent of total lending	38.5	36.3	35.2	36.5	38.4	42.1	41.5	July 2018
Asset quality ²								•
Non-performing loans (in billions of euro)	1.3	1.4	4.0	4.1	4.0	2.5	1.9	July 2018
Non-performing loans/total loans (in percent)	0.5	0.6	1.3	1.3	1.5	1.7	1.5	June 2018
Provisions to non-performing loans (in percent)	N.A.	N.A.	37.8	35.3	35.9	31.7	33.8	June 2018
Household non-performing loans/total household loans (in percent)	0.6	0.7	1.5	1.6	2.1	2.2	2.00	March 2018
Household non-performing loans/total non-performing loans (in percent)	51.9	54.5	41.3	43.3	48.8	53.9	49.1	March 2018
Capital adequacy								
Regulatory capital as percent of risk-weighted assets	17.0	16.0	17.3	22.9	23.3	21.4	21.0	June 2018
Regulatory tier 1 capital to risk-weighted assets	16.1	15.2	16.4	21.5	21.9	19.6	19.1	June 2018
Regulatory tier 1 capital to total assets	3.8	4.3	4.0	5.2	5.9	8.1	8.0	June 2018
Equity/total assets (in percent)	4.4	5.0	4.3	5.6	6.5	9.0	8.8	June 2018
Profitability						1.3		
Interest rate margin (percentage points, e.o.p.) ³	1.4	1.5	1.5	1.4	1.4	1.4	1.4	August 2018
Net interest income (in percent of total income)	43.8	40.8	41.7	38.9	36.8	40.9	48.2	June 2018
Return on equity (in percent)	11.1	9.6	11.3	11.5	10.6	7.5	5.2	June 2018
Return on assets (in percent)	0.5	0.5	0.5	0.6	0.6	0.5	0.5	March 2018
Liquid assets/total assets (in percent) ⁴	14.7	14.9	14.3	16.7	19.0	27.1	16	June 2018
Liquid assets/short-term liabilities	19.2	19.7	18.9	22.4	25.1	30.9	31	June 2018
Deposits as percent of assets	27.5	30.6	26.6	29.8	33.5	53	51.9	June 2018
Loan-to-deposit (LTD) Ratio	134.5	133.1	129.3	124.6	111.8	121.5	129.5	June 2018
Off-balance sheet liabilities/total assets (in percent)	11.1	11.6	12.9	13.1	18.9	20.4		June 2017
Use of ECB refinancing (billions of euro) ⁵	3.7	2.5	0.7	0.7	6.7	10.1	8.6	July 2018
in percent of banks total assets	0.7	0.6	0.1	0.1	1.6	5.5	5.3	July 2018
in percent of total ECB refinancing operations	0.3	0.3	0.1	0.1	1.1	1.3	1.2	July 2018
Asset prices	3.3	2.3						10., 2010
Change in stock market index (in percent, e.o.p.)	8.3	26.5	5.7	10.8	3.6	6.6	8.6	August 2018
Change in housing price index (in percent, e.e.p.,) Change in housing price index (in percent, year average)	1.7	1.6	-0.5	-0.8	0.5	1.4	0.8	June 2018
enange in reasons price mach (in percent, year average)	1.7	1.0	0.5	0.0	0.5	-8.0	0.0	Julie 2010
Memorandum items:								
Credit-to-GDP gap	9.0	8.0	9.7	10.6	-7.4	-7.4		December 201

Sources: Bank of Finland, Financial Supervision Authority, Finnish Bankers' Association, Haver Analytics, Statistics Finland, and Fund staff calculations.

¹ Debt between domestic non-financial corporations is eliminated

² Change in definition of NPLs in 2014. Other receivables, undrawn credit facilities and guarantees and other commitments are excluded from the denominator

 $^{{\}tt 3\ Average\ of\ margins\ (average\ lending\ rate\ minus\ average\ deposit\ rate)\ on\ loans\ to\ non-MFls.}$

⁴ Cash and debt securities eligible for central bank funding

 $^{5\ \}text{Sum}$ of main and long-term refinancing operations and marginal facility.

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	Finland		
Foreign asset and liability position and trajectory	Background. Finland's net international investment position (NIIP) was 2½ percent of GDP as of end-2017, after 8.6 percent in 2016. Gross assets and liabilities have both declined in recent years, and now stand at 278 and 276 percent of GDP in 2017, respectively. The financial sector accounts for just over half of both external assets and liabilities, while the remainder is largely held by nonfinancial corporations and government social security funds. Assessment. The NIIP is expected to remain positive over the medium term, consistent with improvement in current account balances. Vulnerabilities mainly stem from the large cross-border exposures of the financial sector, including liquidity risk related to foreign-financed wholesale funding.		Overall Assessment: The external position of Finland in 2017 was assessed to be moderately weaker than medium-term fundamentals and desirable policies. Unit labor costs
Current account	Background. Finland's current account balance turned to deficit in 2011 amid the sharp export decline of the wood and paper and electronics industries (Nokia). The deficit has averaged around 1.2 percent of GDP during the past five years. Exports recovered strongly across different sectors in 2017 and into early 2018, reflecting brisk external growth and the recent moderation of unit labor costs, which underpinned Finnish competitiveness. The current account balance is expected to be negative in 2018 and improve thereafter to a small surplus over the medium term, reflecting improved market shares and still-supportive, even though moderating, external demand conditions. Assessment. The EBA current account model estimates a gap of -2.1 percent of GDP in 2017, resulting from a cyclically-adjusted current account balance of -1.3 percent of GDP and an EBA current account norm of 0.8 percent of GDP. Taking into account the normal uncertainties around the estimates, staff assess the CA gap to be between -1 and -3¼ percent. The same model estimates a largely unchanged norm for 2018; when applied to projected current account balances for 2018, the gap would be -1.3 percent of GDP. These estimates of current account gaps are consistent with real exchange rate overvaluation in the range of 5 to 10 percent. Background. After the depreciation in 2010–11, the CPI-based REER has been relatively stable for the last 6 years. It		have declined and market shares have increased, but the improvement in the trade balance has as yet been modest and offset by persistent negative net income balances. Potential policy responses: Wage restraint has resulted in some gains to
Real exchange rate	depreciated by about 0.4 percent in 2010–11, the CPI-based REER has been relatively stable for the last 6 years. It depreciated by about 0.4 percent in 2017 and by a further 0.4 percent the first half of 2018. Growth in unit labor costs exceeded that in euro area trade partners notably during 2011 and 2012. The resulting cost competitiveness gap is now being closed on the back of wage restraint and a recovery in output: The ULC-based REER depreciated by some 6 percent in 2017 and a by a further one percentage point in the first half of 2018. **Assessment.** The EBA level and index REER models suggest that the REER was overvalued by 5 and 7 percent, respectively. The EBA external sustainability model suggests a REER undervaluation of 4 percent. Staff assess the REER to be between 5 and 10 percent above the level consistent with fundamentals, reflecting a small cost competitiveness gap, which is expected to be gradually closed going forward.	}	competitiveness, but it will also be important to increase wage flexiblity at the firm level, including to enhance the economy's ability to adjust to future shocks. Structural reforms should continue to increase
Capital and financial accounts: flows and policy measures	Background. Net total financial inflows moderated to 2 percent of GDP in 2017, mostly reflecting developments in the Financial account. Portfolio flows into equities and fixed income instruments posted a small outflow of around 2 percent of GDP in 2017. This outflow was offset by an inflow into financial derivatives of about 3.6 percent of GDP. Finally, FDI outflows and other investment inflows were both of the order of ½ percent of GDP, broadly offsetting each other. Assessment. Finland has a fully open capital account. It remains exposed to financial market risks against the background of interconnected regional financial markets.		productivity and support the ongoing recovery. Ongoing gradual fiscal consolidation is also expected to buttress the external balance.
FX intervention and reserves level	Background. The euro has the status of global reserve currency. Assessment. Reserves held by Euro area countries are typically low relative to standard metrics. The currency is freely floating.		
Technical Background Notes	¹⁷ A standard deviation of 1.2 percent of GDP around the cyclically-adjusted current account norm is applied to obtain the current account gap range. Note that data for the trade and income balances and net international investment position in 2016 and 2017 were substantially revised in November 2018, indicating a 0.7 percent of GDP current account deficit in 2017 instead of a 0.7 percent surplus.		

Annex II. Debt Sustainability Analysis

With the recovery projected to continue, and given expected future fiscal consolidation, debt is projected to decline further. In the baseline scenario, debt would return to levels below 60 percent of GDP by 2019. A contingent liability shock is the stress scenario with the greatest impact on the public debt-to-GDP ratio. Under the assumptions of this scenario, the debt ratio would peak to around 75 percent of GDP in 2020.

A. Baseline Scenario

- **1. Macroeconomic assumptions.** With the economy strongly recovering, real GDP growth is expected to peak at 2.4 percent in 2018 and decelerate to 1.9 percent in 2019, gradually reverting to potential growth—estimated at 1½ percent—over the medium term. GDP deflator inflation is expected to rise from 1.6 percent in 2018 to 1.8percent in 2019; thereafter it is expected to converge toward 2 percent. Interest rates are expected to remain subdued in the near term and increase gradually when monetary policy eventually begins to normalize.
- 2. Notwithstanding that debt is projected to continue to decline, this DSA uses the higher scrutiny framework, given that Finland's debt level remained just above 60 percent of GDP in 2017. Given the current economic recovery, debt will maintain a downward path, although the pace of future consolidation has been slowed.¹ It is also notable that social security funds, a part of general government, are accumulating assets; thereby government net worth improves faster than debt declines. Debt is expected to return to just below 60 percent of GDP by 2019 and continue to decline thereafter. Given the relatively long average maturity of Finnish public debt (7 years), the gross financing needs remain below 13 percent of GDP every year in the baseline scenario. However, net financial worth is estimated to be negative when pension liabilities are taken into account (Finland: Staff Report for the 2017 Article IV Consultation). This highlights the need for closely monitoring long-term sustainability of the fiscal position.
- **3. Realism of baseline assumptions.** Median forecast errors for the primary balance (- 0.47 percent of GDP, 54th percentile) and inflation (0.18 percent, 62nd percentile) have been relatively moderate. With growth over the last decade especially volatile in Finland, the median forecast error for real GDP growth has been relatively high at -1.2 percent (25th percentile).
- 4. The forecast fiscal adjustment is not large in either absolute terms or in comparison to other countries' experiences. The maximum 3-year change in the cyclically-adjusted primary balance (CAPB) places Finland in the 45th percentile of the distribution of CAPB adjustments cross countries.

B. Stress Testing

5. Finland's debt ratio would remain under 75 percent of GDP even in the worst shock scenario examined. For the standard macro-fiscal stress scenarios, the debt ratio stays below 60 percent of GDP, except in the real GDP shock scenario, in which it would peak at almost

¹ The growth impact of fiscal measures is already incorporated in the baseline projections.

70 percent of GDP. The contingent liability shock scenario causes the largest debt ratio increase, to a peak of 75 percent of GDP in 2020.

6. The shock scenarios include:

- Real GDP growth shock: Under this scenario, growth is one standard deviation lower than the baseline in both 2019 and 2020 (i.e. 3.4 percentage points lower). This also causes inflation to be around 84 basis points lower in these years. In 2020, the debt ratio peaks at almost 70 percent of GDP and the gross financing need peaks at 19 percent of GDP.
- Primary balance shock: In this scenario, the primary balance is 1½ percentage points of GDP lower than in the baseline in both 2019 and 2020. This causes the debt path to slightly increase in those years, but the debt ratio remains below 60 percent of GDP throughout the forecast horizon (ending up at 53 percent in 2023). Gross financing needs increase by about 3 percentage points of GDP during the years of the shock and remain above the baseline thereafter.
- Real interest rate and real exchange rate shocks: Under the real interest rate shock scenario, the effective interest rate gradually rises from 2020 to exceed the baseline by 1¼ percentage points by 2022. Debt will remain on a declining path, albeit at a slightly slower pace than in the baseline.² A real exchange rate shock does not have any direct impact on debt sustainability, as the vast majority of debt issuance is in euros and all foreign currency issuance is completely hedged by the Finnish State Treasury.
- Combined macro-fiscal shock: This scenario is a combination of the effects of the macro-fiscal scenarios above. In this scenario, growth and inflation fall, the primary balance deteriorates, the exchange rate depreciates, and interest rates rise relative to the baseline. The debt ratio peaks at 69 percent of GDP in 2020, while the gross financing need rises to 19 percent of GDP in 2020.
- Contingent liability shock: This scenario could emerge in the event of a financial crisis (e.g., as a result of spillovers from a housing market correction in another Nordic country impacting Finland through financial, trade, and confidence channels). In this scenario, the contingent liability shock in 2018 equals about 13 percent of GDP. Additionally, growth falls as in the real GDP shock scenario and the effective interest rate rises by 0.1 percentage point by 2019. As a result, the debt ratio increases by 15 percent points of GDP above the baseline and gross financing needs peak at 23 percent of GDP in 2019. The debt ratio peaks at 75 percent of GDP in 2020.³

² If assets of social security funds were included in the analysis, increases in interest rates would increase the net financial worth of the public sector.

³ The scenario assumes a one-time increase in non-interest expenditures equivalent to 10 percent of banking sector assets, which, given the strong capital position of Finnish banks, is a very large shock. (Note that the 2016 FSAP found that impacts of a severe shock of the magnitude of the 1990s financial crisis on bank solvency would actually be relatively small.) The shock is assumed to trigger a real GDP growth shock (as above), with growth reduced by 1 standard deviation for 2 consecutive years, leading also to a decline in inflation. While the revenue-to-GDP ratio remains the same as in the baseline, deterioration in the primary balance lead to higher interest rates.

Finland Public Sector Debt Sustainability Analysis (DSA)—Baseline Scenario

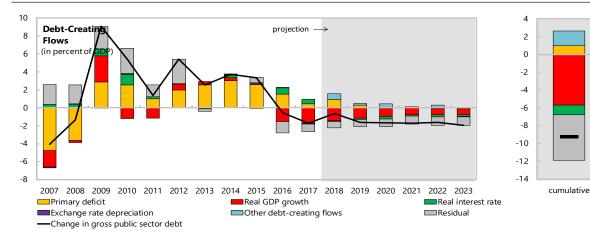
(In percent of GDP unless otherwise indicated)

Debt, Economic and Market Indicators 1/

	Actual				Projections					As of August 29, 2018		
	2007-2015 2/	2016	2017	2018	2019	2020	2021	2022	2023	Sovereign	n Spreads	
Nominal gross public debt	48.7	63.0	61.3	60.6	59.0	57.3	55.6	54.0	52.1	EMBIG (b	p) 3/	12
Public gross financing needs	9.3	8.5	8.3	8.1	10.1	12.6	9.0	11.1	11.3	5Y CDS (b	op)	18
Real GDP growth (in percent)	0.1	2.5	2.8	2.4	1.9	1.7	1.4	1.3	1.3	Ratings	Foreign	Local
Inflation (GDP deflator, in percent)	2.2	0.6	8.0	1.6	1.6	1.8	1.8	1.9	2.0	Moody's	Aa1	Aa1
Nominal GDP growth (in percent)	2.3	3.1	3.6	4.1	3.6	3.6	3.2	3.2	3.3	S&Ps	AA+	AA+
Effective interest rate (in percent) 4/	3.1	1.8	1.6	1.5	1.4	1.4	1.5	1.5	1.6	Fitch	AA+	AA+

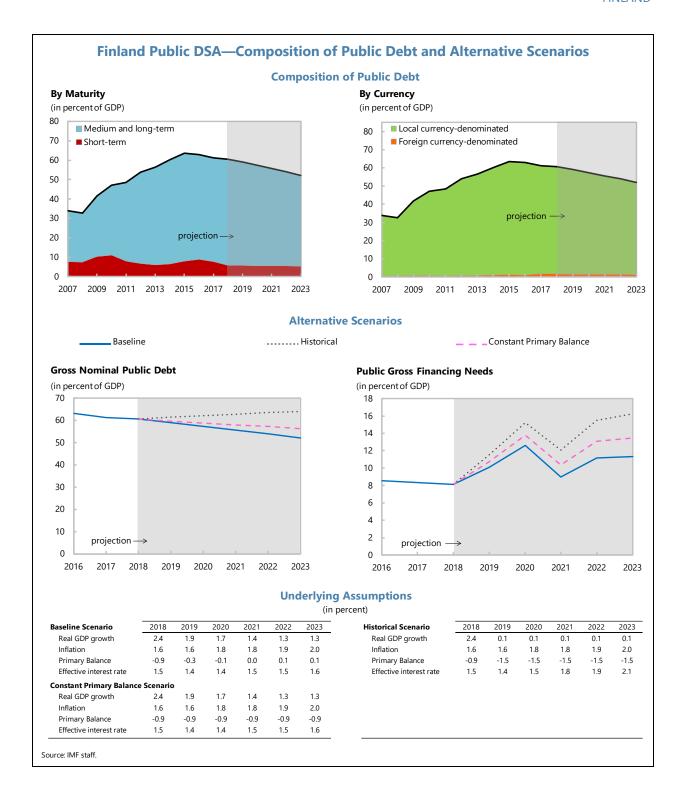
Contribution to Changes in Public Debt

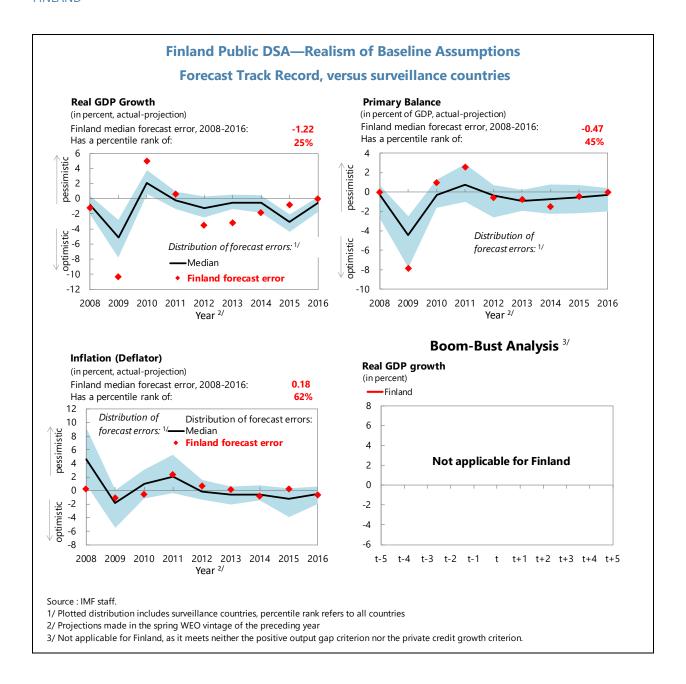
_	Actual							Projec	tions		
	2007-2015	2016	2017	2018	2019	2020	2021	2022	2023	cumulative	debt-stabilizing
Change in gross public sector debt	2.8	-0.5	-1.7	-0.7	-1.6	-1.7	-1.7	-1.6	-1.9	-9.2	primary
Identified debt-creating flows	1.3	0.7	-0.9	0.0	-0.8	-0.8	-0.8	-0.7	-1.0	-4.1	balance ^{9/}
Primary deficit	0.9	1.5	0.4	0.9	0.3	0.1	0.0	-0.1	-0.1	1.0	-0.9
Primary (noninterest) revenue and g	rants 52.0	53.3	52.5	51.1	51.0	50.8	50.8	50.8	50.8	305.3	
Primary (noninterest) expenditure	52.9	54.8	53.0	52.0	51.2	50.8	50.8	50.7	50.7	306.3	
Automatic debt dynamics 5/	0.4	-0.8	-1.3	-1.5	-1.3	-1.2	-0.9	-0.9	-0.9	-6.8	
Interest rate/growth differential 6/	0.3	-0.8	-1.2	-1.5	-1.3	-1.2	-0.9	-0.9	-0.9	-6.8	
Of which: real interest rate	0.4	0.7	0.5	-0.1	-0.1	-0.3	-0.2	-0.2	-0.2	-1.1	
Of which: real GDP growth	0.0	-1.5	-1.7	-1.4	-1.1	-1.0	-0.8	-0.7	-0.7	-5.7	
Exchange rate depreciation 7/	0.0	0.0	-0.1								
Other identified debt-creating flows	0.0	0.0	0.0	0.7	0.2	0.4	0.1	0.3	0.0	1.6	
0 (negative)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Contingent liabilities	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Acquisition of assets by social secur	rity funds 0.0	0.0	0.0	0.7	0.2	0.4	0.1	0.3	0.0	1.6	
Residual, including asset changes 8/	1.6	-1.3	-0.8	-0.7	-0.8	-0.9	-0.9	-0.9	-0.9	-5.1	

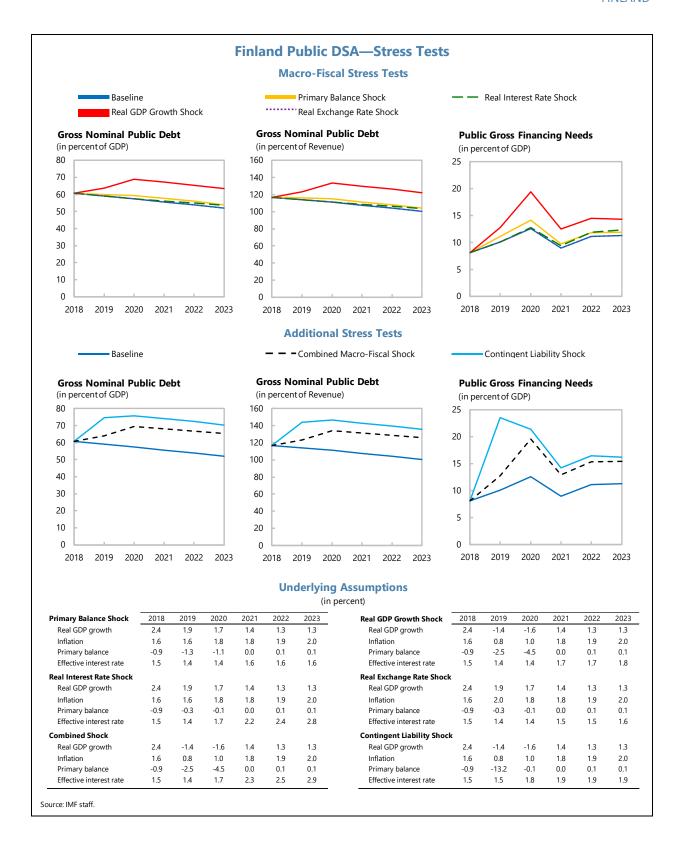


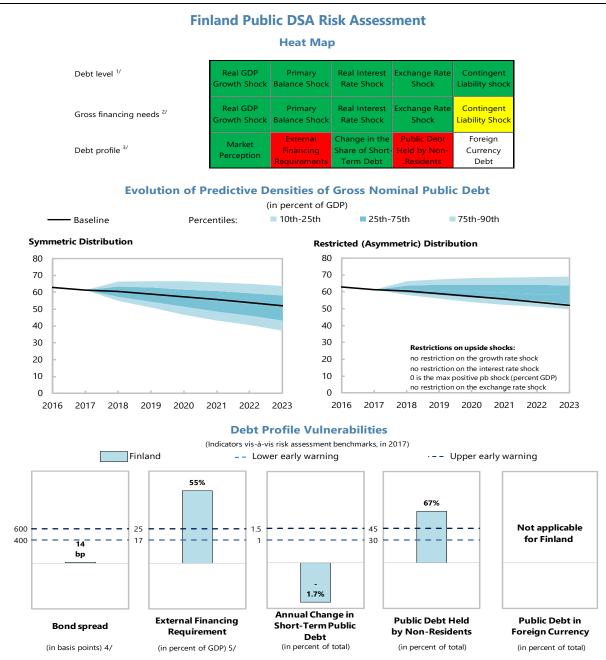
Source: IMF staff.

- 1/ Public sector is defined as general government.
- 2/ Based on available data.
- 3/ Long-term bond spread over German bonds.
- 4/ Defined as interest payments divided by debt stock (excluding guarantees) at the end of previous year.
- $5/\ Derived\ as\ [(r-\pi(1+g)-g+ae(1+r)]/(1+g+\pi+g\pi))\ times\ previous\ period\ debt\ ratio,\ with\ r=interest\ rate;\\ \pi=growth\ rate\ of\ GDP\ deflator;\ g=real\ GDP\ growth\ rate;$
- a = share of foreign-currency denominated debt; and e = nominal exchange rate depreciation (measured by increase in local currency value of U.S. dollar).
- 6/ The real interest rate contribution is derived from the numerator in footnote 5 as r π (1+g) and the real growth contribution as -g.
- 7/ The exchange rate contribution is derived from the numerator in footnote 5 as ae(1+r).
- 8/ Includes asset changes and interest revenues (if any). For projections, includes exchange rate changes during the projection period.
- 9/ Assumes that key variables (real GDP growth, real interest rate, and other identified debt-creating flows) remain at the level of the last projection year.









Source: IMF staff

1/ The cell is highlighted in green if debt burden benchmark of 85% is not exceeded under the specific shock or baseline, yellow if exceeded under specific shock but not baseline, red if benchmark is exceeded under baseline, white if stress test is not relevant.

2/ The cell is highlighted in green if gross financing needs benchmark of 20% is not exceeded under the specific shock or baseline, yellow if exceeded under specific shock but not baseline, red if benchmark is exceeded under baseline, white if stress test is not relevant.

3/ The cell is highlighted in green if country value is less than the lower risk-assessment benchmark, red if country value exceeds the upper risk-assessment benchmark, yellow if country value is between the lower and upper risk-assessment benchmarks. If data are unavailable or indicator is not relevant, cell is white.

Lower and upper risk-assessment benchmarks are:

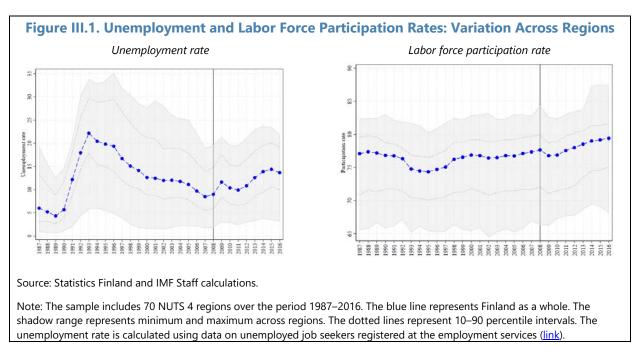
400 and 600 basis points for bond spreads; 17 and 25 percent of GDP for external financing requirement; 1 and 1.5 percent for change in the share of short-term debt; 30 and 45 percent for the public debt held by non-residents.

4/Long-term bond spread over German bonds, an average over the last 3 months, 29-May-18 through 29-Aug-18.

5/ External financing requirement is defined as the sum of current account deficit, amortization of medium and long-term total external debt, and short-term total external debt at the end of previous period.

Annex III. Regional Labor Mobility in Finland¹

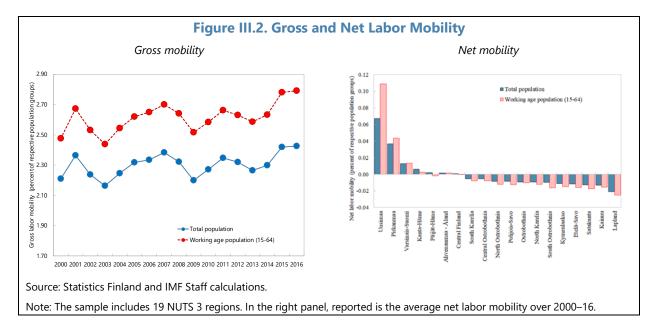
- 1. Regional labor mobility is important to cushion regional shocks in Finland. Other shock absorption mechanisms, such as wage adjustments, have been constrained in Finland due to the centralized wage bargaining process prevailing until 2016. In the absence of labor mobility, labor shortages in some regions could coexist with persistently high unemployment in others. This could unduly inflate the national unemployment and lead to increased demands on fiscal redistribution from low-unemployment to high-unemployment regions.
- 2. Unemployment and labor force participation rates are persistent and vary widely across Finnish regions. In low-unemployment regions, the unemployment rate fluctuated around from 1 to 6 percent during 1987–2016, while in high-unemployment regions it was consistently high, reaching 35 percent in 1996. Similarly, labor force participation rates ranged from around 65 to 82 percent before the crisis, with the range widening further in 2016. Moreover, there is high persistence over time: regions with high unemployment in 1987 tend to have high unemployment in 2016. The presence of large regional discrepancies in unemployment and labor force participation rates and their persistence are indirect signs of limited labor mobility.



Regional labor mobility is not high. On average, about 2.3 (2.6) percent of total (working age) population in Finland moves across regions every year. While comparison with other countries is difficult in the absence of standardized cross-country datasets, the mobility is low when comparing to the U.S., where about 9 percent of the population moved between states and 18.6

¹ The Annex draws on Tigran Poghosyan (2018), "Regional Labor Mobility in Finland," IMF Working Paper WP/18/252.

percent of population moved between counties in 2000s.² Gross mobility exhibits some cyclicality and has picked up following the global financial crisis. Net mobility (the difference between in- and out-migration) varies across regions. Some Southern regions, especially urban areas, serve as net recipients of labor flows, while some Northern regions, especially rural ones, serve as net donors.

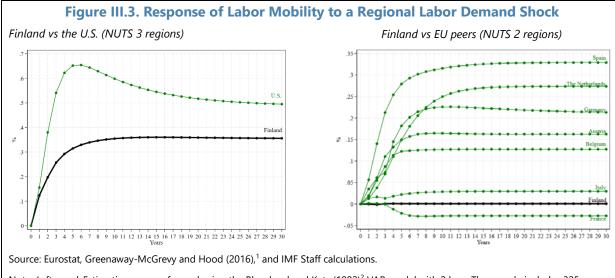


4. Comparison of Finland with the U.S. and EU peers shows relatively modest responses of regional labor mobility to shocks. Following the Blanchard and Katz (1992) methodology, we draw on an identity describing the evolution of regional labor markets following a shock to regional labor demand. In the short-run, a temporary adverse shock to labor demand can lead to an increase in unemployment rate, a reduction in the labor force participation rate, and/or a decrease in working age population due to out-migration (labor mobility). In the long-run, the impact of a temporary shock on the unemployment and labor participation rates is assumed to dissipate and hence the change in the level of employment is fully explained by labor mobility. Using NUTS 3 level regional data,³ our analysis suggests that a 1 percent decrease in a regional labor demand is associated with a 0.35 percent increase in labor moves to other regions in Finland. This is a smaller response than estimated for the US (0.52 percent). Comparisons across European economies show close to 0 percent labor mobility in Finland, which is the second lowest among EU peers.⁴

² See Molloy, R., C. Smith, and A. Wozniak (2011), "Internal Migration in the United States," *Journal of Economic Perspectives*, 3: pp. 173–96.

³ NUTS refers to the Nomenclature of Territorial Units for Statistics.

⁴ To facilitate this comparison, the less granular NUTS 2 level regional data were used.



Note: *Left panel*. Estimations are performed using the Blanchard and Katz (1992)² VAR model with 2 lags. The sample includes 325 Metropolitan Statistical Areas (MSAs) in the U.S. for the period 1990–2012.

Right panel. Estimations are performed using the Blanchard and Katz (1992) VAR model with 2 lags. The sample includes NUTS 2 regions for the period 2000–16.

- 5. Several impediments appear to constrain regional labor mobility in Finland. Gravity analysis on a sample of regional labor flows across pairs of 19 NUTS 3 regions suggests that regional labor mobility is adversely affected by the geographical distance across regions, and positively affected by the size of the population in the origin and destination regions. Also, there is evidence that labor moves out from regions with relatively low GDP per capita, high unemployment and house prices toward regions with relatively high GDP per capita, low unemployment, and low house prices. By contrast, real wages in the origin and destination regions do not have a significant impact on regional labor mobility. This could be because relatively low variation of wages across regions due to centralized wage bargaining does not provide sufficient incentives for mobility.
- 6. Targeted policies could help incentivize more regional labor mobility to contribute to the efficiency of job matching and reduce the fiscal redistribution burden. Some of the impediments to labor mobility are exogenous and are driven by relatively large geographical distances across regions, as well as relatively sparse population density. Other impediments can be influenced by policies. For instance, more regional wage flexibility could provide further incentives for regional labor mobility. The decentralization effort as part of the Competitiveness Pact in 2016 is a step in the right direction, but there is scope for enhancing decentralization further at the local and firm level. In addition, the generosity of the unemployment insurance system and social benefits could be revisited further, which in combination with strengthening of active labor market policies would encourage job search and reduce unemployment differentials across regions. Finally, improving infrastructure and transportation, especially around vibrant urban areas, could encourage commuting and reduce pressures on urban housing demand. Reduction of the mortgage interest deductibility could reduce the home ownership bias and make rental market more vibrant.

¹ Greenaway-McGrevy, R. and K. Hood, 2016, "Worker Migration or Job Creation? Persistent Shocks and Regional Recoveries," *Journal of Urban Economics*, 96: pp. 1–16.

² Blanchard, O., and L. Katz, 1992, "Regional Evolutions," Brookings Papers of Economic Activity, 23(1): pp. 1–76.

Annex IV. Risk Assessment Matrix 1

(Potential Deviations from Baseline)

Source of Risks and Relative Likelihood	Expected Impact if Risk is Realized				
	Downside Risks				
High	Medium/High				
Rising protectionism and retreat from multilateralism. Global imbalances and fraying consensus about the benefit of globalization lead to escalating and sustained trade actions and	Escalating trade tensions would not only undermine Finnish exports, but could stall the current upswing via lower investment, employment and thereby overall output growth. Disruptions to global value chains could disrupt the production and supply of goods and harm productivity.				
spreading isolationism.	Policy response: Allow automatic stabilizers to operate.				
Medium	Medium/ High				
Weaker-than-expected global growth:	Weaker growth globally or in Europe would undermine Finnish exports, stall the ongoing expansion in equipment investment and lead to lower output and employment growth.				
Weak growth in key advanced economies including Euro area and US Medium					
Significant China slowdown Low/Medium	Policy response: Allow automatic stabilizers to operate.				
High	Low/Medium				
Sharp tightening of global financial conditions. Tighter financial conditions could be triggered by sharper-than expected increases in US interest rates prompted by higher-than-expected inflation or the materialization of other risks	Adjustments to tighter financial conditions could prove disruptive, leading to higher uncertainty, reduced availability of credit and higher financing costs for households and firms. High corporate savings and Finland's high sovereign credit rating may help to buffer the impact on the broader economy. However, despite Finnish banks' strong capital buffers, if the shock were large and protracted, it could potentially disrupt their operations, given the reliance on wholesale funding.				
	Policy response: Take preemptive prudential measures to reduce financial sector vulnerabilities, monitor risks at individual institutions. If market stresses materialize, the central bank should supply liquidity promptly.				
Medium	Medium				
Adverse shock in a neighboring Nordic country, leading to a correction in the housing market, and	Lower demand of key trading partners would reduce domestic output and employment. Finnish financial sector would see declining asset quality and funding difficulties.				
distress in the financial sector.	Policy response: Full implementation of macroprudential policy tools, including liquidity measures. Allow automatic stabilizers to operate.				
Low	Medium				
Postponement or abandonment of planned reforms, including the health and social services	Abandoning health and social services reforms would impair full restoration of fiscal buffers. Failure to increase labor market flexibility would constrain potential growth.				
reform; and labor market reforms	Policy response: Seek support for the reform agenda using the window of opportunity afforded by the economic recovery.				
	Upside Risks				
Medium	Medium				
Stronger than expected private domestic demand.	High household and corporate confidence and still-accommodative financial conditions could support greater momentum in domestic demand into 2019, especially through a continuation of the investment cycle.				
	Policy Response: Push forward with productivity-enhancing structural reforms and consider fiscal measures to accelerate rebuilding of buffers.				

¹ The Risk Assessment Matrix (RAM) shows events that could materially alter the baseline path (the scenario most likely to materialize in the view of IMF staff). The relative likelihood of risks listed is the staff's subjective assessment of the risks surrounding the baseline ("low" is meant to indicate a probability below 10 percent, "medium" a probability between 10 and 30 percent, and "high" a probability of 30 percent or more). The RAM reflects staff views on the source of risks and overall level of concern as of the time of discussions with the authorities. Non-mutually exclusive risks may interact and materialize jointly.

Annex V. Past Fund Staff Recommendations and Implementation

Past Staff Recommendations	Implementation
Fisc	al Policy
The fiscal adjustment should remain focused on restoring long-term fiscal sustainability while minimizing negative short-term effects on output.	The 2019 Budget implies a moderate tightening of fiscal policy in 2019, partly reflecting measures carried over from previous budgets, including expenditure savings measures from the government's consolidation plan.
Resources not destined to deficit reduction should be reallocated toward productive public spending, while reducing poorly-targeted transfers and tax expenditures.	Recent structural reforms encompassed both growth- enhancing and revenue-control measures, including the reductions in the duration of unemployment benefits, R&D and education spending. The authorities continue to implement their medium-term consolidation programs to ensure fiscal sustainability.
	A report on the basic income experiment (UBI) is set to expire at the end of 2018 and a report from the authorities is expected by December 2018.
Ensure that health and social services reforms (SOTE) moves forward and generates the ambitious targeted revenue savings and	The SOTE proposal is currently under consideration by Parliament, with voting expected before the end of 2018.
productivity gains. Clear and timely communication about the key elements of the new system and potential implementation hurdles should be maintained with stakeholders.	The transition to the new health and social reforms regime has been postponed by one year to January 2021.
Labor M	larket Policy
The Competitiveness Pact and other targeted measures, including provisions to improve incentives to re-enter the labor market and increasing the flexibility of firm-level wage bargaining, should be implemented in full.	The Competitiveness Pact has been fully implemented, and the wage freeze in 2017, resulted in a material decline in ULCs and a notable improvement in Finland's cost-competitiveness.
Strengthen ALMPs further to facilitate labor mobility, as job-to-job transition remains comparatively modest.	Funding for active labor market policies was augmented to the increase the frequency of interviews with unemployment insurance recipients and step-up job-matching efforts.
	Measures were implemented to address the inactivity trap: childcare fees were reduced for low- and middle-income families, vocational educational programs were broadened with a focus on life-long learning, duration of unemployment benefits was shortened, conditions for granting unemployment benefits were tightened, a tapering scheme for unemployment benefits was introduced to incentivize job search efforts.

Past Staff Recommendations	Implementation
Product I	Market Policy
Reforms to the retail and state-dominated sectors, such as rail and postal services, should be furthered to increase competition and yield productivity gains.	The Postal Act and Decree was amended in 2017 to diminish regulatory obstacles and boost job creation. The Land Use and Building Act and building regulations have been modernized in May 2017, relaxing size restrictions for large stores and allowing stores to develop their concepts more freely without limitations on their location. The revised provisions of the Alcohol Act entered into force from 2018, modernizing the rules and reforming the outdated, cumbersome and unnecessary regulation.
	In August 2018, the authorities announced that railways will also be liberalized, and work is starting to this effect. Finally, the authorities are considering to further privatize other public corporations.
Financial	Sector Policy
The relocation of Nordea to Finland implies a significant increase of the scale and depth of FIN-FSA supervision and cross-border coordination; despite the good progress so far, additional resources may be needed for this task.	Nordea is now supervised by the Single Supervisory Mechanism (SSM) in collaboration with Finnish authorities. FIN-FSA's staffing increases to oversee Nordea's relocation to Finland have been accomplished successfully.
Bank supervision should be strengthened further by ensuring effective monitoring of banks' internal risk models and intensifying oversight of their liquidity positions.	Targeted review of internal models (TRIM) was conducted in coordination with the SSM to harmonize practices and ensure compliance with regulatory requirements. A 15 percent minimum risk weight on residential mortgage loans was introduced.
Macroprudential tools should be enhanced, including through introduction of instruments based on borrower and loan characteristics.	Legislation for a Systemic Risk Buffer has been approved by parliament and is now effective. The authorities are exploring options to expand the macroprudential toolkit to include more instruments based on borrower and loan characteristics. There is a continued effort to introduce a
	comprehensive positive credit register and more comprehensive data collection among non-bank providers of credit.
AML issues require continued effort to improve effectiveness, including by making sure that appropriate resources are devoted.	The AML Act was revised in 2017. Among the changes are increased written documentation of the risk assessments process.
Strengthen regional supervisory cooperation, including through data sharing, supervisory cooperation provisions, conduct of joint stress tests to capture regional linkages between banks, and enhancing joint crisis planning.	To this effect, an updated comprehensive MOU on cooperation on financial stability between Nordic and Baltic countries was signed in January 2018.



INTERNATIONAL MONETARY FUND

FINLAND

December 17, 2018

STAFF REPORT FOR THE 2018 ARTICLE IV CONSULTATION—INFORMATIONAL ANNEX

Prepared By

European Department

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FUND RELATIONS

(As of November 30, 2018)

Membership Status: Joined January 14, 1948; Article VIII.

General Resources Account:	SDR Million	Percent of Quota
Quota	2,410.60	100.00
Fund holdings of currency	2,113.38	87.67
Reserve Tranche Position	297.22	12.33
Lending to the Fund		
New Arrangements to Borrow	114.43	

SDR Department:	SDR Million	Percent of Quota
Net cumulative allocation	1,189.51	100.00
Holdings	1,121.77	94.31

Outstanding Purchases and Loans: None

Latest Financial Arrangements: None

Projected Payments to Fund:

(SDR million; based on existing use of resources and present holdings of SDRs):

,	Forthcoming					
	2018	2019	2020	2021	2022	
Principal						
Charges/Interest		0.75	0.75	0.75	0.75	
Total		0.75	0.75	0.75	0.75	

Exchange Rate Arrangements:

Finland's currency is the euro, which floats freely and independently against other currencies.

Finland has accepted the obligations under Article VIII, Sections 29a0, 3, and 4 of the Fund's Articles of Agreement. It maintains an exchange system free of restrictions on the making of payments and transfers for current international transactions, except for those measures imposed for security reasons in accordance with Regulations of the Council of the European Union, as notified to the Executive Board in accordance with Decision No. 144-(52/51).

Article IV Consultation:

Finland is on the 12-month consultation cycle.

FSAP Participation:

Finland had a review under the Financial Sector Assessment Program (FSAP) in 2016.

STATISTICAL ISSUES

(As of October 31, 2018)

I. Assessment of Data Adequacy for Surveillance

General: Data provision is adequate for surveillance. The country has a full range of statistical publications, many of which are on the internet. The quality and timeliness of the economic database are generally very good.

II. Data Standards and Quality

Subscriber to the Fund's Special Data Dissemination Standard (SDDS) since June 3, 1996. Uses SDDS flexibility option for timeliness on data for central government operations.

Adherent to the Fund's Special Data Dissemination Standards Plus since June 6, 2018.

The authorities have expressed initial interest to adhere to the Special Data Dissemination Standard Plus.

National Accounts: Finland publishes the national accounts according to the *European System of Accounts (ESA) 2010* since September 2014.

Government Finance Statistics: Government finance statistics were published based on *ESA 2010* methodology since September 2014.

External Sector Statistics: Finland publishes external sector statistics based on the sixth edition of the *Balance of Payments and International Investment Position Manual (BPM6)* format since December 2014.

Monetary and Financial Statistics: Monetary data reported for *International Financial Statistics* are based on the European Central Bank's (ECB) framework for collecting, compiling, and reporting monetary data.

Finland: Table of Common Indicators Required for Surveillance								
(As of November 31, 2018)								
	Date of latest observation	Date received	Frequency of Data ⁷	Frequency of Reporting ⁷	Frequency of Publication ⁷			
Exchange Rates	11/31/18	11/31/18	D	D	D			
International Reserve Assets and Reserve Liabilities of the Monetary Authorities ¹	10/2018	11/2018	М	М	М			
Reserve/Base Money	10/2018	11/2018	М	М	М			
Broad Money	10/2018	11/2018	М	М	М			
Central Bank Balance Sheet	10/2018	11/2018	М	М	М			
Consolidated Balance Sheet of the Banking System	10/2018	11/2018	М	М	М			
Interest Rates ²	10/31/18	10/31/18	D	D	D			
Consumer Price Index	10/2018	11/2018	М	М	М			
Revenue, Expenditure, Balance and Composition of Financing ³ – General Government ⁴	2017	09/2018	А	А	А			
Revenue, Expenditure, Balance and Composition of Financing ³ – Central Government	2017	09/2018	А	А	А			
Stocks of Central Government and Central Government-Guaranteed Debt ⁵	09/2018	10/2018	М	М	М			
External Current Account Balance	09/2018	10/2018	М	М	М			
Exports and Imports of Goods and Services	10/2018	11/2018	М	М	М			
GDP/GNP	Q3 2018	11/2018	Q	Q	Q			
Gross External Debt	Q3 2018	11/2018	Q	Q	Q			
International Investment Position ⁶	Q3 2018	11/2018	Q	Q	Q			

¹ Includes reserve assets pledged or otherwise encumbered as well as net derivative positions.

² Both market-based and officially-determined, including discount rates, money market rates, rates on treasury bills, notes, and bonds.

³ Foreign, domestic bank, and domestic nonbank financing.

⁴ The general government consists of the central government, including National Insurance Scheme, and local governments.

⁵ Including currency and instrument composition.

⁶ Includes external gross financial asset and liability positions vis-a-vis nonresidents.

⁷ Daily (D); weekly (W); monthly (M); quarterly (Q); annually (A); irregular (I); and not available (NA).

Statement by Mr. Kimmo Tapani Virolainen Alternate Executive Director for Finland January 11, 2019

Recent Economic Developments, Outlook and Risks

Economic growth has continued for almost three years, fuelled in particular by the recovery in Finnish goods and services exports. Household consumption has also increased, as growth in disposable income and low interest rates have encouraged household spending. Employment growth has exceeded expectations.

The fundamentals for continued economic expansion remain in place. The Competitiveness Pact, which restricted the increase in labor costs, has contributed to improving Finnish companies' global competitiveness. The Finnish economy will continue to grow, although more moderately than in the past two years and at a considerably slower pace than prior to the financial crisis in 2008. The growth rate will gradually decelerate to its long-term potential rate.

The exceptionally rapid growth in employment witnessed in 2018 will slow down going forward, partly due to labor market mismatches. The number of unemployed is still high in Finland, despite an increase in job openings. Mismatches reflect differences in the supply and demand of labor both geographically and in terms of skills. Certain sectors, such as construction and services, have especially suffered from labor shortages. Job creation is also being constrained by a decline in the working-age population.

Uncertainty surrounding global economic development has increased, and risks to the Finnish economic growth are now clearly tilted to the downside. Exports will continue to grow at a reasonable pace in the baseline scenario, but a realization of the foreseeable risks could cut export growth significantly. This constitutes the greatest downside risk in the immediate years ahead.

Household consumption has exceeded household disposable income in recent years, leading to a rise in household debt levels. Even though household income will grow markedly faster in the forecast period than in the past few years, household indebtedness will likely rise further.

Overall, even though growth in output and employment will continue, the peak of the Finnish economic cycle has been passed. This is partly explained by the slowing down of the global upswing. Going forward, population aging and weak productivity developments will begin to put a further drag on the Finnish growth outlook.

Fiscal Policy

The economic upswing has continued to strengthen public finances. With higher tax revenues, lower unemployment-related expenditures, and some positive one-off factors, the 2018 budget deficit is expected to decrease to EUR 1.25 billion (0.5 percent of GDP). Due to the strong cyclical position, the fiscal stance in 2018 was slightly expansionary. However, the authorities are highly committed to the medium-term consolidation plan implying a contractionary fiscal

stance again in 2019. Spending growth will be reined in by the adjustment measures outlined in the Government Program, the impacts of which will be felt gradually, and the fact that the Government's key projects will no longer boost expenditure in 2019.

The deficit will remain clearly under the EU Stability and Growth Pact's (SGP) 3 percent of GDP reference value limit throughout the forecast horizon. Public finances are expected to be in balance at the beginning of the 2020s. In addition, it appears that the Government will broadly achieve its own fiscal targets set for 2019 with projections of the general government net lending of -0.4 percent of GDP and the debt ratio of 58.4 percent of GDP.

The debt-to-GDP ratio turned to a downward path already in 2016, falling below the EU SGP's 60 percent reference value in 2018, and the growth momentum will keep reducing the ratio going forward. In 2018, aided by some positive one-off factors, the central government was able to reduce the outstanding stock of debt (by EUR 0.9 billion) for the first time in 10 years. However, in 2019, the central government debt is expected to grow again by EUR 1.6 billion.

The authorities are well aware of the structural weaknesses in the public finances and concur with staff's recommendation that the favorable cyclical situation presents an opportunity to rebuild fiscal buffers. Demographic headwinds and increasing age-related public expenditures make building fiscal buffers more challenging. Despite the recent strong economic growth and already implemented consolidation measures, fiscal buffers remain thin.

At the start of the current Government's term in 2015, it outlined a combination of measures to ensure sustainable growth and public finances. The measures aim at cost savings of some EUR 10 billion and consist of consolidation measures (EUR 4 billion), structural reforms (EUR 4 billion), and measures boosting growth and employment (EUR 2 billion). The fiscal consolidation measures are specified and broadly confirmed, with some risks related to the measures to be implemented by the autonomous municipalities. The bulk of the cost savings from the structural reforms is expected to result from the social and healthcare reform in the long term. Growth and employment have been boosted by the Competitiveness Pact and will be further boosted by measures aimed at improving productivity growth, as well as by shifting taxation from labor to indirect taxation.

Structural Issues

Social and healthcare reform

A fundamental reform of the social and healthcare services (SOTE) is necessary due to the demographic headwinds and a lack of equal access to public health and social services. Currently, there are wide differences in the availability, quality, and costs of services between municipalities and regions.

The reform is estimated to bring cost savings. Costs will not be cut from what they are at present, but their future increase is estimated to be curbed by EUR 3 billion by 2029. For this to

be possible, health and social service expenditure can only be allowed to grow by 0.9 percent per year, whereas at present they increase by 2.4 percent annually. The cost and efficiency gains are expected to be realized via better integration of both health and social services on one hand, and primary and specialized care on the other hand, as well as by allowing more freedom of choice for customers through increased competition. Moreover, digitalization and technology are expected to yield efficiency gains when effectively and systematically implemented in the counties.

With the help of the cost and efficiency gains, the reform aims to safeguard equal access to social and healthcare services. Another aim of the reform is to create a more harmonious regional administration than at present, which will provide multiple public services. It will clarify public administration by transferring the responsibility for organizing these services from nearly 400 different responsible authorities to 18 autonomous counties with directly elected decision makers.

According to the plan, the regional government, health, and social services reform is due to come into force on January 1, 2021, with the freedom of choice being implemented in stages in 2021–23. The laws will be put to a vote in the Parliament in early 2019 after the final constitutional assessment. The election of the county councils will be held in the fall 2019.

Labor market reforms and competitiveness

The 2016 Competitiveness Pact between the social partners has been successful in lowering unit labor costs and restoring national competitiveness. Its main elements consisted of reductions in employers' social security contributions, extensions in working time, cuts in public sector holiday pay, and wage freezes in 2017. At the same time, the Government implemented tax concessions to compensate for purchasing power losses.

In addition, as agreed in the Competitiveness Pact, social partners have held discussions to reform the highly-centralized wage bargaining process but with limited success so far. While the outcome of the 2017–18 decentralized, but closely coordinated, wage bargaining round was satisfactory, further progress is needed going forward.

Several labor market reforms have been implemented in recent years, including the pension reform, reduction in the duration of earnings-related unemployment benefit, mandatory job search plans, and regular interviews for all unemployed jobseekers, and reforms to the unemployment insurance system incentivizing active job search and making short-term and part-time work financially more viable. Recently, the Parliament approved a legislative change making hiring and firing easier for smaller firms.

Due to demographic headwinds, a key goal of the current Government has been to raise the employment rate from 68 percent in 2015 to 72 percent by 2019. Aided by the stronger than

expected economic rebound, this goal has now been reached as Finland's seasonally adjusted employment rate rose to 72 percent in November 2018.

The more pessimistic demographic outlook of the latest population forecast, however, strengthened the demographic pressures. The declining birth rate will reduce the working age population in the future, which contributes to the strain on public finances. This emphasizes the need for increasing the employment rate further and implementing structural reforms.

While a lot of progress has been made, further reforms to improve the functioning of the labor market are needed. The authorities continue to work on improving incentives to work by changes to the social benefits. In connection with the SOTE reform, public employment services will be reorganized into the 18 new regional governance structures. Several new measures have been piloted and initiated with the aim of addressing labor market matching problems and new forms of work, with a strong emphasis on digitalization and intelligent matching.

As regards labor mobility challenges, a major obstacle is the lack of affordable housing in growth centers. Housing construction in the Helsinki Metropolitan area has increased significantly in recent years but it will take time to meet the demand for affordable housing. The authorities continue to take measures to deal with the housing situation in growth centers by adjusting zoning rules and building regulations.

Financial Sector Stability

The Finnish financial system continues to be sound with a well-capitalized and profitable banking system. The authorities broadly concur with staff's conclusions about the key challenges for financial supervision and oversight, including financial sector size, high concentration, strong regional interconnections, and digitalization. Moreover, the low interest rate environment continues to pose challenges for both the banking and insurance sectors.

Nordea's relocation from Sweden to Finland significantly increased both the size of the Finnish banking sector, to about 375 percent of GDP, and the exposure of the Finnish financial system to other Nordic economies. The authorities have responded to the new challenges by strengthening domestic supervisory resources and making sure that Nordea's capital requirements are maintained at a sufficient level in the transition period and in the longer term, including a 3 percent systemic risk buffer effective from July 1, 2019. The Single Supervisory Mechanism (SSM) plays a key role in ensuring a consistent application of EU regulations and common supervisory practices across the euro area, while the Single Resolution Mechanism (SRM) works to ensure a consistent approach to banking resolutions. These are important elements in safeguarding the safety and soundness of the Finnish banking system. Moreover, the Nordic-Baltic regional supervisory cooperation, already at a good level in international comparison, continues to function with the ECB and the SRM having taken the lead in the joint supervisory and resolution colleges, respectively. The

authorities are committed to continue the joint monitoring of financial stability risks and reciprocation of macroprudential measures.

The authorities share staff's desire to have further progress in completing the Banking Union, including a common European deposit insurance scheme. However, this is possible only if further progress is made in reducing the risks in the European banking sector.

Household indebtedness stands at historical heights at approximately 128 percent of disposable income. In 2018, loans to housing corporations and consumer loans increased rapidly. High indebtedness and an increased number of consumer payment default entries have prompted a review by the Ministry of Justice on establishing a comprehensive credit registry in Finland with a legislative proposal expected to be issued in 2019.

House price developments have continued to be moderate at the aggregate with increasing divergence across the country. Large regional differences are driven by urbanization and investor demand. Consumer confidence has remained relatively robust implying that household indebtedness may continue to increase adding to the elevated structural vulnerability.

The national macroprudential authority—the FIN-FSA—has taken several measures to safeguard against increasing system-wide risks in the credit market. An average risk weight floor of 15 percent on mortgage loans for IRB banks came into force on January 1, 2018. The loan-to-collateral cap on housing loans was reduced from 90 to 85 percent in July 2018. In June, the FIN-FSA imposed a systemic risk buffer on all Finnish credit institutions and re- examined the institution-specific additional capital requirements on larger credit institutions, which will be binding by July 1, 2019.

The authorities broadly agree with staff on the need to develop and broaden the macroprudential toolkit. They are currently analyzing whether to include additional borrower-based tools into the toolkit and a legislative proposal is likely expected in 2019. They also agree on the need to increase the coverage of data collection among non-bank providers of debt.