
Finnish Defence Intelligence Agency - an Actor in National Security?

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Introduction

The Civilian and Military Intelligence Acts entered into force in Finland on 1 June 2019, in other words at a time when a century had passed since the emergence of independent Finnish military intelligence and 70 years after the establishment of the Finnish Security Police, nowadays known as the Finnish Security and Intelligence Service (FSIS).¹ With the FSIS and the Finnish Defence Intelligence Agency (FDIA) securing new statutory powers to acquire and use information on both domestic and international threats to Finland's national defence and security, these public authorities have been transformed into combined domestic security and foreign intelligence services. They are empowered to discharge their functions using a range of 24 statutory intelligence gathering methods together with certain customary legal approaches.² This represents a fundamental reform that, along with a robust arsenal of intelligence gathering methods, will inevitably change the mindset and behaviour of the Finnish intelligence authorities.

There are more common than disparate features in Finnish civilian and military intelligence. One disparate feature is their express relationship to national security. The website of the FSIS prominently declares that the organisation is an expert in national security.³ It is steered by a National Security Unit that within the Ministry of the Interior.⁴ As before the new intelligence legislation took effect, the FDIA continues to state that it focuses on the strategic military conditions and on the military situation in the near abroad.⁵ The National Defence Unit in the Ministry of Defence is responsible for steering and co-ordinating military intelligence.⁶ This raises the question of whether the actorness of the FDIA is limited solely to the military defence of Finland, or whether it has any more comprehensive role in protecting national security. This question will be examined by comparing the provisions governing the purpose of civilian and military intelligence, and analyzing the provision governing the targets of military intelligence. The conclusions drawn will be followed by a law recommendation to harmonize the tasks of the Finnish Defence Forces with the purposes of military intelligence.

The Purpose of Civilian and Military Intelligence

Section 1 of Chapter 5a of the Police Act defines civilian intelligence as the gathering of information by the FSIS and the use of information to

safeguard national security, to substantiate top-level government decisions, and for other functions of public authorities related to national security.⁷ The purpose of military intelligence is to obtain and process information on military activities that target Finland or that are relevant to the Finnish security environment, in order to substantiate top-level government decisions and to discharge certain tasks of the Finnish Defence Forces (section 3 of the Military Intelligence Act).⁸

Under the classic definition of scholar Sherman Kent, intelligence may be analyzed into three elements: Information, the organisation that processes it, and the practices of such an organisation.⁹ The foregoing legal definitions of civilian and military intelligence in Finnish intelligence legislation are consistent with the tripartite structure that Kent suggested 70 years ago. These definitions expressly state the parties that run intelligence and how and why they do so (see Table 1).

Table 1. Legal Definitions of Civilian and Military Intelligence

	Who	How	Why
Civilian Intelligence	Finnish Security and Intelligence Service, FSIS	By acquiring and using information	1) To safeguard national security 2) To substantiate top-level government decisions 3) To support other public authorities in discharging functions related to national security
Military Intelligence	Finnish Defence Intelligence Agency, FDIA	By acquiring and processing information	1) To substantiate top-level government decisions 2) To discharge certain tasks of the Finnish Defence Forces

The Finnish Security and Intelligence Service is the only civilian intelligence authority, whereas military intelligence is the sole preserve of the FDIA. In other words, these are the sole authorities with the functions and powers conferred by intelligence legislation. The Finnish Security and Intelligence Service and Finnish Defence Intelligence Agency discharge their intelligence functions by acquiring and using or processing information. Though the terminology differs, the material content is essentially the same: Depending on the stage of the intelligence cycle, the intelligence authorities either collect, process or

analyze information, or disseminate it to end-users. The primary role of the intelligence authorities in countering threats is to observe them, articulate them, and warn of them in advance. This makes the intelligence authorities responsible for providing the intelligence that other authorities require for their operations in response to those threats.

The final question of why the FSIS and FDIA collect, process, analyze and disseminate information may be approached by distinguishing intrinsic and instrumental value in the aims of intelligence legislation. Together with performing certain tasks of the Defence Forces, one intrinsic aim and purpose of intelligence safeguarding national security is to protect the fundamental interests of Finland. These interests are essentially highly pressing when anchored in the foundations of polity and fundamental rights, such as sovereignty of the republic and the indivisibility of its territory, inviolability of legislative, governmental and judicial powers and everyone's right to life, personal liberty and integrity (the Constitution of Finland).¹⁰

Substantiating policymaking by national leaders and supporting other national security agencies may be regarded as instrumental objectives of intelligence. They are instrumental in the sense that the support function materially concerns disseminating information to intelligence clients and partners, in other words an operation in which the outcomes of intelligence missions to protect the key interests of Finland are applied more extensively than within the intelligence authorities. However, the support mission is just as valuable as the other objectives prescribed in the legal definition of civilian and military intelligence. There is only limited benefit to heightening Finland's preparedness and defence capability in response to a deteriorating global and regional security situation if its political leadership and national security agencies are characterised by shortcomings due to slow or non-existent information sharing.¹¹

Intelligence must also be examined as part of Finnish policy in general. The goal of Finland's foreign and security policy – and accordingly of its intelligence functions – is to reinforce the international status of Finland, to safeguard its independence and territorial integrity, to improve the security and wellbeing of its people, to maintain the functionality of society, and ultimately to avoid involvement in military conflict.¹² Credible intelligence can help to guide the behaviour of other countries and at least discourage them from the most overt

infringements of Finland's fundamental interests. Senior Finnish diplomat René Nyberg has observed that every country has intelligence – either its own or that of foreign origin. Only a failed State gives full rein to foreign intelligence within its borders.¹³ As a signal of sovereignty, a domestic intelligence capacity accordingly serves to deter any power planning to subvert government policymaking in Finland or otherwise strike against the key interests of Finland or its people. An uncodified but evident purpose of civilian and military intelligence legislation is therefore to send such a signal and maintain deterrence against adversaries both known and unknown.¹⁴

A comparison of the legal definitions of civilian and military intelligence immediately indicates that only the top national leadership and the Finnish Defence Forces are specified as participants in military intelligence. In other words, the provision governing the purpose of military intelligence suggests that the output of intelligence will be disseminated solely to political policymakers and the military leadership. So, does the Finnish military intelligence also serve domestic and foreign partners outside of the intelligence cycle? Naturally, it does – Finland's principal interests are managed through collaboration between the intelligence authorities and their clients and partners. This collaboration requires a sharing of threat scenarios within the intelligence community, and with relevant domestic public authorities, businesses, and organisations. Finland must also bear international responsibility for the national security of its politically close countries. No country will be repeatedly willing to disclose information that is essential for safeguarding Finland's national security if Finland fails to reciprocate for the benefit of its foreign partners.¹⁵ Neither can the civilian and military intelligence authorities ignore the legitimate needs of law enforcement authorities for information disclosed in the course of intelligence concerning serious offences that have already been committed or are still in progress. The Finnish Defence Intelligence Agency has extensive statutory powers to share information through both national and international co-operation. Besides intelligence clients, domestic and foreign partnerships are of paramount importance in the work of Finnish military intelligence.

Another noteworthy difference in the legal definitions of civilian and military intelligence is that the provision governing the purpose of military intelligence does not refer to national security at all. Is the protection of national security in Finland a matter for civilian

intelligence alone? To answer this question, one must shift focus to the provision on the targets of military intelligence.

Targets of Military Intelligence

The limits governing protection of the secrecy of a confidential message are prescribed in section 10.4 of the Constitution of Finland. The intelligence reform that caused such upheaval in legislation began with amendment of the said section 10.¹⁶ This provision permits the enactment of necessary statutory limits on the secrecy of communications for such purposes as obtaining information on military activities or other corresponding activities that pose a serious threat to national security. Section 10.4 of the Constitution has enabled a disengagement from the requirement to base limits on an offence or suspected offence and the enactment of targets of military intelligence by ordinary law.¹⁷

The targets of military intelligence are prescribed in section 4 of the Military Intelligence Act. Subsection 1 of this provision identifies seven types of activity as a target of military intelligence, provided that the activity is of military character. These military intelligence targets fall within the military activities-related justification for limiting communications secrecy prescribed in section 10.4 of the Constitution of Finland.

In addition to these characteristically military types of activity, military intelligence may also target activities that seriously threaten the national defence of Finland and activities that seriously jeopardize the vital functions of society. These non-military intelligence targets referred to in section 4.2 of the Military Intelligence Act accordingly fall under the national security-related justification for limiting communications secrecy prescribed in section 10.4 of the Constitution. However, these two intelligence targets lie beyond its core scope of military activities (see Figure 1).¹⁸

Figure 1. Targets of Military Intelligence from a Constitutional Viewpoint

1) The operation and operational preparation of foreign armed forces and equivalent organized forces

2) Intelligence operations targeting the national defence of Finland

3) The design, manufacture, distribution and use of weapons of mass destruction

4) Development and distribution of foreign military equipment

5) A crisis that seriously jeopardizes international peace and security

6) An activity that seriously compromises the security of international crisis management operations

7) An activity that seriously compromises the security of Finland's international aid and other international operations

Threats of a non-military character

Threats of a military character

8) Activities that seriously threaten the national defence of Finland

9) Activities that seriously jeopardize the vital functions of society

Source: Author.

It should be noted by comparison that there are 11 targets of civilian intelligence (section 3 of chapter 5a of the Police Act). The targets of civilian intelligence, such as terrorism and intelligence operations of foreign powers, in all respects concern non-military activities that seriously threaten Finland's national security. The demarcation between military and non-military threats is however not clear in terms of practical intelligence operations. For example, the Finnish Security and Intelligence Service understand terrorism as a non-military activity characterised by intimidation of people or coercion of the government, whereas the Finnish Defence Forces and their associated intelligence agency approach terrorism as a form of insurgent or revolutionary warfare.¹⁹ Question about whether the target of information gathering is a dual-use item (civilian intelligence target) or foreign military equipment (military intelligence target) likewise testify to the complex realities of intelligence that either adhere to or disregard normative threat characterisations.

As Figure 1 illustrates, military intelligence targets are broadly located in the field of national security, both at the core of military activities and in the outer reaches of non-military activities. As Finnish military intelligence enjoys predominant status at the core of national security, it may be expected to seek to strengthen its position with respect to non-military threats. There are two ways to do this: By giving military intelligence targets 8–9 the broadest possible interpretation, or by seeking the enactment of legislation on new non-military intelligence targets. As explained below, the dynamic legal interpretation approach goes a long way.

Activities that Seriously Threaten the National Defence of Finland

Finnish national defence encompasses ensuring territorial integrity, the livelihoods and fundamental rights of the people, the practical options of the national leadership, and the lawful social order.²⁰ The primary goal of national defence is to deter the use and threat of military force, and to maintain the capacity to safeguard territorial integrity and repel attacks. One primary threat to national defence is the use of military force against Finland, which may result from military conflict arising in the near-abroad or from crisis jeopardizing international peace and security. For example, it is not realistic to expect Finland to remain outside of any conflict or crisis arising in the Baltic Sea region.²¹ Military intelligence must evidently monitor Finland's security environment for such traditional threats over the long term and

systematically, even before the monitored activity develops into a military threat to Finland's national security.

The threat to national defence referred to in section 4.2 of the Military Intelligence Act also includes new types of threat, such as the Night Wolves motorcycle club (Russki Mototsiklisty International) if this were to become active in Finland. This gang has been operating chiefly as a private military contractor on the Crimean peninsula, involved alongside unmarked Russian military groups in such activities as erecting roadblocks and invasion operations.²² A serious threat to national defence may also be caused by such measures as cyberattacks on the defence administration or against partners of the Finnish Defence Forces. Cyberattacks are comparable to armed assaults in terms of their impact and severity.²³ A threat to national defence may essentially strike at a very wide range of key interests, such as the functional capacity and psychological resilience of the population, and it is also open with regard to its causes and manifestations.

Activities that Seriously Jeopardize the Vital Functions of Society

The vital functions of society are operations that are essential for social functioning and must be maintained under all circumstances. The security strategy for society identifies seven such functions, of which one is the economy, infrastructure, and security of supply.²⁴ Threats pertaining solely to this function include logistical obstructions, interference in the financial system, power failures, and disruption of communication and information systems.

Security of supply in Finland depends on logistics and international contacts. Sea transport carries 90 per cent of Finland's foreign trade and 70 per cent of its imports. Disruptions in sea transport are therefore immediately reflected in Finland's economic and social conditions, and in the system of transport logistics, that supports them. Such disruptions could be caused by a change in international or European security policy.²⁵ A cyberattack on the financial market infrastructure can paralyze payment transactions that are essential to a functioning society and destabilise financial markets. Such severe and unmanaged financial market malfunctions may escalate into economic crises that threaten the entire national economy, for example through a collapse in corporate and government creditworthiness.

The functioning of Finland's energy supply – particularly an uninterrupted supply of electric power – is essential for ensuring the vital functions of society. Supplies of oil, coal, gas, and nuclear fuel depend entirely on imports. Two thirds of this energy originates outside Finland, with two thirds of this imported segment coming from Russia. For instance, even under normal conditions access to electric power through international power cables may be subject to political influence. Disruptions in distribution are generally a greater risk than actual depletion of energy reserves.²⁶

Most critical services in society rely on using electronic information resources, data transmission, and the operation of communication networks. These services are computer-controlled or electronic. Information systems, and the communication networks that link them together, are merging and networking into large and even global entities, meaning that malfunctions easily spread to become systemic. The gravity of this threat is underlined by the reliance on electric power of the information and communication systems that guide society and alert the public to disruptions or emergency conditions.

As these examples of threats to only one vital function in society already indicate, the ninth and final threat serving as a basis for military intelligence encompasses a wide range of non-military threats to national security. Threats to society are dynamic and transformative, whereas the process of de-securitization of phenomena or developments that have already been identified as threats into normal policy issues is a slow one. This means that the repertoire of non-military threats to the vital functions of society is certainly not diminishing.

Conclusions

The concept of national security did not become part of Finnish legislation until an amendment to section 10 of the Constitution of Finland came into force on 15 October 2018. This change paved the way for enactment of the Civilian and Military Intelligence Acts on 1 June 2019. The Finnish Security and Intelligence Service that engages in civilian intelligence work and the Ministry of the Interior, which guides its performance, then hastened to announce their role as actors in national security. No corresponding public territorial claim was made by the FDIA or its administrative overseer at the Ministry of Defence. May one conclude from this that the use of intelligence operations to

safeguard national security has become the sole preserve of civilian intelligence in Finland?

One may not. From a normative point of view, it is undisputed that the FDIA has a central role to play in the production of national security intelligence, and the provision governing the targets of military intelligence actually extends this mission beyond the reaches of civilian intelligence into core areas of national security in the form of threats of military character.²⁷ Besides these militarized threats, the FDIA has the substantive competence to collect and process information on two non-military threats: Activities that seriously threaten Finland's national defence and activities that seriously jeopardize the vital functions of society. Safeguarding national security is accordingly a matter of common concern between civilian and military intelligence in the case of non-military threats, but falls within the sole purview of military intelligence with respect to military threats.

The defence administration has by no means remained passive with regard to the introduction of the concept of national security into Finnish legislation in October 2018, and still less with respect to the impact of this change on the Finnish Defence Forces. Indeed, the research project finalized in May 2020 by the government has created a knowledge base and prerequisites for the development of a comprehensive impact assessment model from the perspective of national security.²⁸ The Ministry of Defence was responsible for the project, and its steering group included representatives from the Ministry for Foreign Affairs, the Ministry of Justice, the Prime Minister's Office, the Ministry of Social Affairs and Health and the Secretariat of the Security Committee.²⁹ It is noteworthy that there was no representative of the Ministry of the Interior on the steering group, even though this is a security ministry by definition. It could be argued that the turf war over national security began even before the ink of the statute book had dried.

The stance of the defence administration and its military intelligence arm towards national security may indeed be characterized as more stealthy and research-driven than the corresponding relationship of civilian intelligence. This stealth is simply due to the custom of not openly communicating matters of military intelligence, whereas the central role of research in turn recalls the esteem and organisation of research in the defence administration.³⁰ The Ministry of Defence has an in-house research unit together with the Scientific Advisory Board

for Defence, which is networked with universities and research institutes. Other noteworthy institutions are the National Defence University and the Finnish Defence Research Agency. These functions and networks provide, if efficiently harnessed, considerable advantage for military intelligence research and development.

The core tasks of the Finnish Defence Forces are prescribed in section 2 of the Act on the Defence Forces.³¹ This provision charges the Defence Forces with responsibility for the military defence of Finland, for supporting other public authorities, for rendering international assistance, and for participating in international crisis management. The general provision defining the mission of the Defence Forces was not amended in the course of enacting the Military Intelligence Act. According to Section 3 of the last-mentioned Act, military intelligence may be used in the following tasks of the Defence Forces:

1. Surveillance of land and sea areas and airspace, and the securing of territorial integrity,
2. Safeguarding the livelihoods and fundamental rights of the people and the practical options available to the national leadership, and defending the lawful social order,
3. Participating in assistance, regional co-operation or other international aid-rendering and international activities based on Article 222 of the Treaty on the Functioning of the European Union or on Article 42(7) of the Treaty on European Union,
4. Participating in international military crisis management and military missions in other international crisis management.

Military intelligence may accordingly be used in all core tasks of the Finnish Defence Forces other than military training and supporting other public authorities. Is it the case that the Defence Force related tasks of military intelligence are wholly exhausted by the existing core tasks of the Finnish Defence Forces? Is it furthermore true that military intelligence plays no part in supporting other public authorities? By no means. The fact that the independent military intelligence purposes recognised under the Military Intelligence Act have not been integrated into the general provision defining the mission of the Defence Forces seems to be the result of either lack of legal comprehension or willingness.

One of the purposes of military intelligence is to collect and process information on activities that seriously threaten Finland's national defence, or that seriously jeopardize vital functions of society. Intelligence concerning threats targeting Finland's national defence is largely not a matter of surveilling land, sea, and airspace, nor is its primary purpose to secure territorial integrity, but to substantiate the policymaking of top national and military leaders. Safeguarding the livelihoods and fundamental rights of the people, ensuring the practical options of the national leadership, and defending the lawful social order are essential, but they are not the only vital functions of society to be considered in military intelligence. Other such functions include the economy, infrastructure, and security of supply, and functional capacity and psychological resilience of the population.³² These purposes of military intelligence constitute a *de facto* extension of the mandate of the Finnish Defence Forces pertaining to military defence of Finland.

The Finnish Defence Intelligence Agency is required to collaborate with both the FSIS and other public authorities in the proper discharge of military intelligence, as provided in sections 17 and 18 of the Military Intelligence Act. It is also empowered to engage in information sharing and other international co-operation with foreign intelligence and security services as stipulated in section 20 of the Military Intelligence Act. It is thus straightforwardly incorrect to argue that military intelligence does not play a role in supporting other public authorities, both domestic and foreign. Hence, it would be appropriate to include all the additions made to the purpose provision under the Military Intelligence Act in the provision defining the core mission of the Finnish Defence Forces. This would primarily be appropriate because the Military Intelligence Act, with its broad powers and as a law applicable both in normal conditions and during emergencies, is one of the prime normative frameworks for the operations of the Finnish Defence Forces.

Endnotes

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