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Directorate for Financial and Enterprise Affairs  
**COMPETITION COMMITTEE**

## Annual Report on Competition Policy Developments in Finland

-- 2021 --

This report is submitted by Finland to the Competition Committee FOR INFORMATION.

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## Finland

### Executive Summary

1. In 2021, the Finnish Competition and Consumer Authority (FCCA) continued its work mostly remotely due to the ongoing pandemic. A number of new decisions were issued over the course of the year. Additionally, the Court of Justice of the European Union (CJEU) gave its preliminary ruling in case concerning the duration and termination of the infringement and the expiration of the penalty payment proposal, and the Supreme Administrative Court of Finland issued its decision in the case respectively. Several other competition cases were also processed in the national courts. Merger filings submitted to the FCCA also reached the level before the pandemic. The Finnish Competition Act was amended, and the changes entered into force in June 2021. Most of these amendments were based on the ECN+ Directive but national additions were also made. At the request of the Ministry of Economic Affairs and Employment (MEAE), the FCCA published a report on whether the obligation to notify a merger should be expanded. In November, the situation with the pandemic allowed the FCCA to hold the annual FCCA Day both on-site and virtually. This year's theme was "*Our data is being collected, stored, and analysed, but for whose benefit? Are competition and consumer protection working?*"<sup>1</sup> Just before the new year, the FCCA's website project was ready to be published. The new website has been designed with the target groups in mind and aims to offer better discoverability of information.
2. This report outlines the activities of the FCCA from the calendar year 2021.

### 1. Changes to competition law, policies, proposed or adopted

#### 1.1. Summary of new legal provisions of competition law and related legislation

3. The changes arising from the ECN+ Directive<sup>2</sup> entered into force with the amended Finnish Competition Act on 24 June 2021.<sup>3</sup> The amendments made to the Competition Act on the basis of the Directive apply to the interviews conducted by the FCCA, its requests for information and inspection powers. Similarly, the provisions on immunity from penalty payments and reduction of penalty payments were revised to ensure the effective functioning of the system throughout the EU. Apart from the required changes, based on national needs, the amendments to the provisions on assessing the amount of the penalty payment imposed for an infringement were included. According to the new provisions,<sup>4</sup> a

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<sup>1</sup> The presentations are available online, some of them in English: <https://www.kkv.fi/ajankohtaista/tapahtumat/kkv-paiva-2021-tietojamme-kerataan-varastoidaan-ja-analysoidaan-mutta-kenen-hyodyksi-toimiiko-kilpailu-ja-kuluttajansuoja/>

<sup>2</sup> Directive (EU) 2019/1 of the European Parliament and of the Council of 11 December 2018 to empower the competition authorities of the Member States to be more effective enforcers and to ensure the proper functioning of the internal market.

<sup>3</sup> Press release in English: <https://www.kkv.fi/en/current/press-releases/changes-to-monitoring-competition-restraints-and-sanctions-imposed-for-infringements-amendments-to-the-competition-act-will-enter-into-force-on-24-june-2021/>

<sup>4</sup> Competition Act, Section 13 onwards.

so-called basic amount, as defined in detail in the provisions, serves as a basis for the calculation. The duration of the infringement, the possible aggravating as well as the mitigating factors and the possible inability to pay are also considered when calculating the final penalty payment. These new provisions are expected to make penalty payments more predictable and be closer to the level applied by the European Commission in the future. These new rules for calculating the new penalty payments will be applied only by the FCCA; the courts retain extensive discretion in assessing the amount of the penalty payment.

4. In its statement from 2021, the Government of Finland finds that effective and independent competition regulation that is based on the facts, is vitally important for the functioning of the economy. Functioning competition gives Finland the ability to respond to the changing world and markets. Additionally, competition encourages innovation and keeps the price level in check. Effective enforcement is important also to companies in terms of predictable operating environment and legal certainty.

## 1.2. Other relevant measures, including new guidelines

5. In August, the FCCA published an informative guide for trade associations. The guide includes some concrete examples on what kind of actions and outputs are allowed from trade associations and what is prohibited in light of competition rules.<sup>5</sup> This kind of guidance was considered important as the legislative changes based on the ECN+ directive also brought changes to penalty payments in terms of trade associations.

6. The FCCA did not publish any new official guidelines in 2021.

## 1.3. Government proposal for new legislation

7. Apart from the ECN+ amendments, no new proposals were published in 2021.

## 2. Enforcement of competition laws and policies

### 2.1. Action against anticompetitive practices, including agreements and abuses of dominant position

#### 2.1.1. Summary of the activities of the FCCA and the courts

8. In 2021, the FCCA gave altogether 15 decisions concerning anticompetitive practices. Two of these were penalty payment proposals submitted to the Market Court. Altogether, nine cases were processed in the national courts.

Table 1. *Antitrust, competitive neutrality and public procurement cases in 2021.*<sup>6</sup>

<sup>5</sup> Available only in Finnish: <https://www.kkv.fi/kilpailuasiat/toimialayhdistykset/>

<sup>6</sup> Cases available on the FCCA's website (in Finnish): <https://www.kkv.fi/paatokset/kilpailuasiat/>

<p><b>Antitrust</b></p>	<p style="text-align: right;"><b>Investigations dropped/case inadmissible:</b></p> <ul style="list-style-type: none"> <li>• three cases concerning suspected competition restraints in the taxi ride brokerage market: Keskustaksi Oy, Kainuun Taksivälitys Oy, Taksi Saimaa Oy</li> <li>• the municipality of Parikkala (pricing of a water supply plant)</li> </ul> <p style="text-align: right;"><b>Penalty payment proposal submitted:</b></p> <ul style="list-style-type: none"> <li>• six companies operating in the real estate management sector and the Finnish Real Estate Management Federation,<sup>7</sup> proposal to the Market Court, according to the FCCA's research, the Finnish Real Estate Management Federation and certain companies that were members of its Board agreed to harmonise the pricing of real estate management services and to increase prices, penalty payments proposed totaling approximately EUR 22 million</li> <li>• Six bus operators and their joint venture,<sup>8</sup> penalty payment proposal to the Market Court, the companies had submitted joint tenders in breach of the Competition Act in three tendering processes for public transport services in the Turku region in 2013, 2014 and 2016, penalty payments proposed in total nearly EUR 1.9 million</li> </ul> <p style="text-align: right;"><b>Other:</b></p> <ul style="list-style-type: none"> <li>• Automatia Pankkiautomaatit Oy (banking, mobile payment solutions), application for removal of commitments imposed pursuant to Section 10 of the Competition Act</li> <li>• taxi service providers of Hyvinkää, prohibition decision, taxi operators operating in the Hyvinkää area had agreed that the drivers would not take customers from taxi stands outside their own driving shifts, this violated the competition rules and was therefore prohibited by the FCCA</li> </ul>
<p><b>Competitive neutrality</b></p>	<ul style="list-style-type: none"> <li>• the city of Tampere / Finnpark Oy (parking services), the FCCA had concerns that Finnpark could benefit from aid received from the city of Tampere, but these concerns were resolved as Finnpark and the city of Tampere took appropriate measures and no further action was required</li> </ul>
<p><b>Procurement</b>  <i>The FCCA is empowered to address direct procurements that are disregarding the provisions set out in the law. Unlawful conduct includes e.g., failures to announce public contracts and arrange competitive bidding resulting in an illegal direct award. In addition, enforcement is directed at discriminatory procurements.</i></p>	<ul style="list-style-type: none"> <li>• the city of Salo, the FCCA reprimanded the City of Salo for failure to comply with the Act on Public Procurement and Concession Contracts when procuring hourly construction works in 2019–2020</li> <li>• the city of Hämeenlinna, the FCCA reprimanded the city of Hämeenlinna for its failure to comply with the Act on Public Procurement and Concession Contracts when procuring an AI solution</li> <li>• the city of Ylivieska (rescue operations), the FCCA reprimanded the city of Ylivieska for not complying with the Act on Public Procurement and Concession Contracts while procuring a new fire truck</li> <li>• Elvera Oy, Elvera Oy did not comply with the Special Procurement Act when it acquired helicopter sawing, flight inspections and disruptive patrol flights; the FCCA drew Elvera's attention to compliance with the Act concerning special sector procurements and in particular to the conditions for exemption from the scope of the Act</li> <li>• the Hospital District of Helsinki and Uusimaa (HUS), the FCCA reprimanded HUS as it did not comply with the Act on Public Procurement and Concession Contracts when it decided in October 2020 on the direct procurement of resuscitation beams. The value of the acquisition was approximately EUR 260,000 and should have been put out to tender</li> <li>• the city of Turku, the FCCA reprimanded The Turku Region Interpretation Centre, which operates under the city of Turku, for not complying with the Act on Public Procurement and Concession Contracts when it procured business interpreting services as a direct contract</li> <li>• the business-based municipal authority of Keski-Savo (waste disposal), the FCCA reprimanded the municipal authority for not complying with the Act on Public Procurement and Concession Contracts when it increased the price it paid to the supplier for waste collection and transportation services during the contract period</li> <li>• the municipality of Muurame (soil materials), the FCCA reprimanded the municipality for not complying with the Act on Public Procurement and Concession Contracts when it procured soil materials directly without a legitimate reason</li> <li>• the city of Seinäjoki and JIK association of municipalities (cleaning supplies), the FCCA reprimanded the city of Seinäjoki and the JIK association of municipalities for failure to comply with the Act on Public Procurement and Concession Contracts as they had continued to procure cleaning supplies and laundry services directly after the contract period had already ended, two separate decisions</li> </ul>

<sup>7</sup> Press release in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/kkv-esittaa-22-miljoonan-uron-seuraamusmaksuja-isannointialan-yrityksille-ja-isannointiliitolle-hintakartellista/>

<sup>8</sup> Presse release in English: <https://www.kkv.fi/en/current/press-releases/the-fcca-proposes-that-nearly-eur-19-million-in-penalty-payments-be-imposed-on-six-companies-operating-in-turku-subregion-public-transport-services-and-their-joint-venture-for-severe-restrictions-on/>

### 2.1.2. Description of significant cases, including those with international implications

9. In antitrust, two proposals were submitted to the Market Court. In February, a case concerning real estate management was covered heavily in the media and even opened a discussion on how harmful the conduct had been for housing companies. According to the FCCA's investigations, the parties had, in 2014, agreed on harmonising the pricing of their services and on upcoming markups. The FCCA proposed penalty payments totalling approximately EUR 22 million to six real estate managements companies and the Finnish Real Estate Management Federation. In September, the FCCA submitted a penalty payment proposal concerning six companies operating in Turku subregion public transport services. According to the FCCA's investigations the parties had, through their joint venture, submitted three joint tenders that were in breach of the Competition Act in the competitive tendering process for public transport services in the area. These joint tenders had in practice eliminated any price competition between the companies participating in the joint tender. The parties also divided the operation of the transport services among themselves following a pre-agreed plan. The total amount of penalty payment proposed was nearly EUR 1,9 million. Both cases are currently pending in the Market Court.

10. In *the Market Court*, altogether six cases concerning proposals or decisions made by the FCCA were processed. In the case of *EPS-insulation*, where the FCCA assessed cooperation between competitors, the Market Court did find that the parties had breached competition rules but imposed lower penalty payments than the FCCA had initially proposed.<sup>9</sup> Two cases concerned public procurement: *the Kymenlaakso association of municipalities*<sup>10</sup> and *the municipality of Puolanka and Terveystalo Kuntaturva Oy*<sup>11</sup>, both concerning social and healthcare services. In these cases, penalty payments were imposed according to the FCCA's proposal. In both, direct procurements had been made although no prerequisites required by the law were present and procurements should therefore have been put out to tender.

11. *Inarin yhteismetsä* (a jointly owned forest in Inari) and person A made a request for action to the FCCA asking the authority to investigate whether certain forestry companies had taken part in anti-competitive conduct while participating in the implementation of the FSC certification of the Forest Stewardship Council. The FCCA did not examine these further as it did not consider it likely that the conduct would constitute a prohibited restriction on competition, that is, the FCCA relied on its duty to prioritise its work. The Market Court returned the cases to the FCCA given that, according to the court, the reasoning had been insufficient, that is, the decisions did not explain with sufficient clarity why the cases were not investigated further.<sup>12</sup>

12. In 2019, two housing companies and an association submitted a request of action in which they requested the FCCA to take measures to eliminate the restrictions on competition in the city of Helsinki's land leasing operations and their harmful effects. The

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<sup>9</sup> Case in Finnish: <https://www.markkinaoikeus.fi/fi/index/paatokset/kilpailu-jaalvontasiat/ccalw3acc.html>

<sup>10</sup> Case in Finnish: <https://www.markkinaoikeus.fi/fi/index/paatokset/kilpailu-jaalvontasiat/mao12021.html>

<sup>11</sup> Case in Finnish: <https://www.markkinaoikeus.fi/fi/index/paatokset/kilpailu-jaalvontasiat/mao18321.html>

<sup>12</sup> Cases in Finnish: <https://www.markkinaoikeus.fi/fi/index/paatokset/kilpailu-jaalvontasiat/mao2202021.html> and <https://www.markkinaoikeus.fi/fi/index/paatokset/kilpailu-jaalvontasiat/mao2212021.html>

FCCA had responded to this that it won't open an official investigation as it has to prioritise its cases and price regulation, or the setting of a certain price level is not one of the primary and priority tasks of a competition authority. The FCCA also noted that the threshold for addressing unreasonably high pricing through competition law has been set very high in case law. The applicant, however, appealed to the Market Court and demanded the case be returned to the FCCA as a reasoned decision that could be appealed on was not issued. The Market Court deemed the case inadmissible and reasoned, e.g., that according to the information received, the request for action must be regarded as a notification to the supervisory authority, which, in the exercise of its discretion, exercises its power to enforce the competition rules. The FCCA's replies to the request for action did not contain a decision on the appellants' right, interest or obligation referred to in Section 44 of the Administrative Code, based on which an appealable decision should have been made.<sup>13</sup>

13. *The Supreme Administrative Court* issued three decisions. In March, the court issued its decisions on the case of *Kainuu social and healthcare association of municipalities*.<sup>14</sup> In 2018, the FCCA had proposed a penalty payment totalling to EUR 25,000 for direct procurement of 3D imaging equipment. The Market Court imposed the penalty payment in line with the FCCA's proposal, but the association of municipalities appealed against its decision. The Supreme Administrative Court's decision, however, rejected this appeal therefore making the initially proposed penalty payment final.

14. The other two decisions were issued in August, the first one of them being the cartel case where a question was referred to the CJEU for a preliminary ruling. The question concerned the duration and termination of the infringement and the expiration of the penalty payment proposal that was initially made as early as in 2014. The ruling of the CJEU<sup>15</sup> was published in January and the national court published its decision<sup>16</sup> in August, consequently. Considering the judgement of the CJEU, the Supreme Administrative Court uphold the Market Court's decisions, dismissing the FCCA's claims. Although the result was against FCCA's argumentation, the case was the first ever where preliminary ruling had been sought in a case concerning the FCCA's proposal, making it an interesting case, and a novel one procedurally.

15. The proposal concerning the antitrust case of *Uudenmaan autokouluyhdistys ry* (the Uusimaa Driving School Association, UAY) and several driving schools was submitted to the Market Court in 2019 and its decision was published in 2020. The FCCA appealed the case to the Supreme Administrative Court and its decision.<sup>17</sup> The FCCA's appeal was accepted partially: sanctions were imposed on price recommendation to the association and three driving schools in the association's board, but claims on the price cartel between three driving schools were dismissed due to lack of evidence.<sup>18</sup>

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<sup>13</sup> Case in Finnish: <https://www.markkinaoikeus.fi/fi/index/paatokset/kilpailu-javalvontasiat/maoh3042021.html>

<sup>14</sup> Case in Finnish: <https://www.kho.fi/fi/index/paatokset/muitapaatoksia/1614758590596.html>

<sup>15</sup> Available here: <https://curia.europa.eu/juris/liste.jsf?language=en&td=ALL&num=C-450/19>

<sup>16</sup> Case in Finnish: <https://www.kho.fi/fi/index/paatokset/vuosikirjapaatokset/1629281006129.html>

<sup>17</sup> Case in Finnish: <https://www.kho.fi/fi/index/paatokset/muitapaatoksia/1629980569570.html>

<sup>18</sup> Press release in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/kho-maarasuudenmaan-autokouluyhdistykselle-ja-kolmelle-autokoululle-seuraamusmaksut-hintasuosituksesta-esitys-hintakartellista-hylattiin/>



## 2.2. Mergers and acquisitions

### 2.2.1. Statistics on number, size and type of mergers notified and/or controlled under competition laws

**Table 1. Merger cases overview 2011–2021.**

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Mergers filed	42	29	20	30	28	36	32	39	34	22	38
Phase II required	2	3	3	2	2	3	6	8	4	4	5
Conditional clearance	1	0	2	2	1	2	2	5	4	2	3
Mergers blocked	0	0	0	0	0	0	0	0	1	1	0

### 2.2.2. Summary of significant cases

16. In 2021, altogether 38 mergers were submitted to the FCCA, restoring the annual amount to the level before the pandemic. Altogether 36 decisions were given over the course of the year, including three conditional clearances.

17. Merger between two alcoholic beverage manufacturers, *Altia* and *Arcus*, was conditionally cleared by the FCCA in April. During its investigation, the FCCA found that merger would have adverse effects on competition in the sales of fruit liqueurs to the retail monopoly (*Alko*), and in sales of aquavit to the retail monopoly as well as to the hospitality and food service sector. To remedy the adverse effects in the aquavit markets, *Altia* committed to selling the aquavit brand *Skåne Akvavit* in Finland. The divestiture was reinforced with a *requirement* for an *upfront* buyer. The competition concerns in the market for fruit liqueurs were cleared via a commitment by *Arcus* to end its contract for distribution of *Metsämaasikas* strawberry liqueur.<sup>19</sup>

18. An acquisition of *Heinon Tukku*, a grocery wholesaler, by *Valio*, a food manufacturer, was cleared in June. According to the FCCA's investigations, the acquisition did not lead to the exclusion of the parties' competitors from the relevant markets. However, *Valio* was seen to be at risk of receiving confidential information on the wholesale pricing of competing manufacturers and other terms and conditions of contractual relationships through *Heinon Tukku*. In order to clear these concerns, *Valio* committed to protect the confidential information it receives of its competitors in a way that it will not be passed on to the organisation in an anti-competitive manner. The commitment is valid for 10 years from the approval of the acquisition.<sup>20</sup>

19. The third merger cleared conditionally was between *Assemblin* and *Fidelix Holding*, two firms operating in markets for supply and maintenance of building automation. In the competitive assessment the FCCA found that the merger would have led

<sup>19</sup> Press release in English: <https://www.kkv.fi/en/current/press-releases/the-fcca-has-conditionally-approved-the-merger-between-altia-and-arcus/>

<sup>20</sup> Press release in English: <https://www.kkv.fi/en/current/press-releases/the-fcca-conditionally-approves-the-merger-between-valio-and-heinon-tukku/>



to significant impediment of competition in the markets for supply and installation of building automation in the regions of Uusimaa and Pirkanmaa. The parties would have formed a clear market leader and there would not have been sufficient competition in these regions in the markets for installation of building automation systems. The adverse effects would have been intensified by the parties' strong presence in supply of the building automation systems, allowing the parties to influence their competitors operating in the market. The FCCA cleared the merger subject to divestiture of certain building automation functions of Assemblin, including a commitment to transfer an automation system to the buyer. The divestiture was reinforced with a requirement for an upfront buyer.<sup>21</sup>

### 3. The role of competition authorities in the formulation and implementation of other policies, e.g., regulatory reform, trade, and industrial policies

20. In recent years, there has been discussion in the member states, whether the EU competition policy is up-to-date and still needed or should the competition rules be relaxed or even dismissed to give the European Union more possibilities to compete with other countries. In October, Finland, together with nine other Member States, wrote a joint letter to the European Commission. This joint letter proposes that the basic principles of competition policy remain unchanged. According to the responsible ministry, MEAE, there are growing concerns that the pressure for change could lead to concrete new policies and the Ministers strive to influence the Commission's future policies.<sup>22</sup>

21. Over the course of the year, the FCCA also issued opinions on matters concerning competition e.g., to the committees of the Parliament. Such opinions amounted to approximately 130, that is, the FCCA also remains an active stakeholder in terms of legislative processes.

## 4. Resources of competition authorities

### 4.1. Resources overall

22. The overall resources of the FCCA in 2021: 223.5 person-years

23. Competition enforcement: 77.56 person-years

#### 4.1.1. Annual budget (in EUR and USD)<sup>23</sup>

For the FCCA totally (covering both Consumer and Competition enforcement) EUR 18,460,000 (+ EUR 260,000<sup>24</sup>), approx. USD 19,446,000.

For Competition enforcement approx. EUR 7,028,000 (+ EUR 102,000<sup>25</sup>), approx. USD 7,403,000.

<sup>21</sup> Press release in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/kkv-hyvaksyi-ehdollisena-assemblinin-ja-fidelix-holdingin-valisen-yrityskaupan/>

<sup>22</sup> The letter, together with a blog post with the MEE's views in English is available on the MEE's website: <https://tem.fi/en/blog/-/blogs/finland-defends-strong-eu-competition-policy>

<sup>23</sup> Currency conversion date: 29 April 2022.

<sup>24</sup> Change from previous year.

<sup>25</sup> Change from previous year.

#### 4.1.2. Number of employees (person-years)

24. Competition enforcement:
- economists: 19.56 (-0,6)<sup>26</sup>
  - lawyers: 44.00 (-0.47)
  - other professionals: 9.00 (+0.55)
  - support staff: 5.00 (+0.14)
  - all staff combined: 77.56 (-0.37)
25. Additionally, 17.82 person-years in the Advocacy and research department.<sup>27</sup>

#### 4.2. Human resources in competition enforcement (person-years) applied to

- Enforcement against anticompetitive practices: 43.85 person-years
- Merger review and enforcement: 15.72 person-years
- Advocacy efforts: approx. 24.60 (17.82 person-years from the Advocacy and research department included)

#### 4.3. Period covered by the above information

26. The information provided is based on the situation on 31 December 2021.

### 5. Summaries of or references to new reports and studies on competition policy issues

27. In 2021, the FCCA published several studies on competition issues. The issues covered included algorithms and collusion, personalised pricing, comparative studies on competitive neutrality and a study on the requisites for expanding the notification criteria in merger control. The latter was published in June 2021, but it gained more interest from the public early in autumn, when the question rose again in the public debate in the media. According to this FCCA report, expanding the obligation to notify mergers would create significant consumer benefit. The obligation to notify mergers should be modified by lowering the current turnover thresholds and by granting the FCCA the right to require a notification when thresholds are not met. The study was conducted at the request of the MEAE.<sup>28</sup> The MEAE has published a memorandum based on the report and stakeholders have had the opportunity to comment on it. These opinions will be taken into account when considering the next steps.

28. All the reports are available on the FCCA's website, however, only in Finnish.<sup>29</sup>

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<sup>26</sup> Change from previous year.

<sup>27</sup> The department serves both Competition and Consumer Divisions.

<sup>28</sup> Press release, in English: <https://www.kkv.fi/en/current/press-releases/fcca-study-expanding-the-obligation-to-notify-mergers-would-create-significant-consumer-benefit/>

<sup>29</sup> The reports in Finnish: <https://www.kkv.fi/tutkimus-ja-vaikuttaminen/julkaisut/>