



14 December 2010

Frontex

Dear Sir/Madam,

In the 30th Management Board Meeting held in Brussels on 24-25 November 2010 the delegations were invited to submit their possible written contributions for further drafting of the Frontex Code of Conduct (the point 3.2 at the agenda of the meeting).

The Finnish Border Guard would like to stress that generally the drafted Code of Conduct – document can be seen as a logical and beneficial document for all participants in Frontex coordinated operational activities. However, we consider that following remarks should be noticed during finalizing the document in question:

1. There is overlap between Article 9 and 19 (Use of force); these Articles should be merged.
2. In Article 10 there is stated that "*Participants shall not express themselves in the media, unless the special authorisation from their superiors is given*". There should be more accurate definition for the term superior; this might mean Frontex Coordinating Officer (or comparable representative of Frontex) or national superior from the home country. Or both of these together.
3. In article 24 (Sanctions) could include the reference to the article 10c of Frontex Regulation.

Should you have any additional information in this matter, please do not hesitate to contact us.

Member of the Management Board
Lieutenant General

The non-disclosed text contains personal data, in particular the name of the individual. The disclosure of such information would undermine the protection of privacy and the integrity of the persons concerned and constitute the violation of EU laws regarding the protection of personal data. In this regards the text is not disclosed pursuant to the exception laid down in the Article 4(1)(b) of the Regulation 1049/2001.