

Submission appendix by Transfeminiinit - Transfeminines,  
to the Submission by Seta Lgbtiq Rights in Finland, Trasek, Transfeminiinit, Isio, Trans ry to  
the UN Human Rights Committee for its 131st Session (01 Mar 2021 - 26 Mar 2021), 7th  
periodic report of Finland on CCPR - International Covenant on Civil and Political Rights

We, the Transfeminiinit - Transfeminines, would like to add the following comments concerning transgender healthcare to the section about “Access to gender affirming health care” of our common submission signed by Seta, Trasek, Isio, and us the Transfeminiinit.

We would like to notify that the current legislation<sup>(1)</sup> restricts the right to give health care to transgender persons in their transition process only to two university hospitals in Finland, namely the Helsinki and the Tampere University hospitals. Their capacity is limited, as also stated in the commonly signed submission. As an addition, we are notifying the UN Human Rights Committee about the fact that the private sector of healthcare has no right to give hormone replacement therapy or genital surgery for the transition to transgender persons.

Our members have told us of private healthcare doctors having their medical licence restricted after treating transgender patients’ gender dysphoria with hormone replacement therapy. We know that the official gender clinic of the Helsinki University Hospital has made complaints to Valvira<sup>(2)</sup> about private doctors treating their patients’ gender dysphoria. They did not mention this to the patient in question. It is worth noting that private doctors treating cisgender patients’ hormonal disorders do not face the risk of restrictions to their medical licence.

The monopoly situation creates a situation where transgender persons have no option to choose their healthcare provider freely for their transition. This is in sharp contrast with other patients in the healthcare system. It creates also a situation where transgender patients are discriminated based on their location. From the northern parts of Finland, patients have to travel up to 1000 kilometers, just for a one hour doctor’s appointment with their Transgender Clinic or other clinics such a Gynecological Clinic for hormone treatment. A more equal situation would be to get such treatment either by public service at a local central hospital, or by the private sector at a suitable place near the patient.

In, Helsinki, on the 31st January 2021  
Transfeminiinit ry - Transfeminia rf - Transfeminines  
<https://transfeminiinit.fi/wordpress/>

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<sup>1</sup> The decree from the ministry of social affairs and health about organizing the research and healthcare aiming to change a person’s gender, and about the medical investigation required for changing the legal gender of a transsexual person:  
<https://www.finlex.fi/fi/laki/alkup/2002/20021053>

<sup>2</sup> The National Supervisory Authority for Welfare and Health, <https://www.valvira.fi/web/en>