Reykjavík, 16th November 2026

Subject: Review of the proposed change to the regulation on secure means of support for residence permits for students from outside the EEA/EFTA

Röskva, a student movement at Háskóli Íslands (HÍ), submits this review of the Ministry of Justice's draft regulation on requirements for secure means of support in applications for residence permits (case no. S-225/2026) [1]. Röskva represents students at HÍ, of which many are international students from outside the EEA/EFTA who will be directly affected by the proposed changes.

Röskva accepts that the state sets requirements for secure means of support under Article 56 of the Act on Foreigners, no. 80/2016. However, we do not accept that these requirements should be set so high, or in such a way, that students who meet every academic requirement cannot realistically fulfil them. Our comments are as follows.

What the draft changes

Under Article 4 of the draft, the minimum amount of support for an adult is the average of three social benefit thresholds: the housing benefit income-free threshold, full disability pension with household supplement and the income threshold at which single-parent child benefits begin to be reduced. Article 6 sets the factor for residence permits to study for both students and doctoral candidates at 0.75 of this amount.

Given the revised general amount would be ISK 501,186 a month, the requirement for students would be ISK 375,890 a month [2]. This is a significant 45% increase on the previous figure of ISK 259,951 and a 52% increase on the ISK 247,572 that applied before the 18th of May 2026 [3].

Under Article 56 of the Act on Foreigners, no. 80/2016, support must be shown for the entire validity period of the permit. Given that study permits are generally not granted for more than twelve months at a time, as stated in Article 65 of the Act, a first-time applicant must therefore show ISK 4,510,680, compared with ISK 3,119,412 under the current figure.

The requirement does not match students' real circumstances

None of the three amounts in Article 4 measure the cost of living and studying in Iceland. They are thresholds taken from housing benefits, disability pension and child benefits. The draft gives no explanation as to why these are a suitable basis for students, why the average of the three is the right figure, or why a factor of 0.75 of a regular citizen is appropriate for students when they can only work 60%.

Students who cannot show the full sum of money when reapplying for their student residence permits typically have to earn the required threshold per month. Holders of a student residence permit are allowed to work 60% of a full-time job alongside their studies. However, failure to comply with this limit can lead to the revocation of the student's right to work.

Many students from outside of the EEA/EFTA take on low paying jobs whilst they study that are simply incapable of earning ISK 375,890. Even without that limit, requiring students to earn this sum every month alongside full-time study (and 75% credit progress at renewal, under Article 65) risks undermining the very studies the permits exist for.

Given that many would not be able to earn this sum, many students planning to renew their permits would be unable to do so and they would not be given a residence permit renewal to continue their studies. Additionally, university would effectively be out of reach to new students from this group without the ISK 4,510,680 that they must show before applying.

PhD students

This is particularly of concern to doctoral candidates from outside of the EEA/EFTA. These students make up 57% [4] of all PhD candidates at HÍ as of 2025-2026 and actively contribute to the University's academic status and international standing. These students are only able to support themselves here on the grants that they receive for their funded PhDs. However, many of these students are only provided with partial funding and thus less than would be expected for a full-time position. For many PhDs, exclusivity is written into their contracts which means that they cannot work elsewhere during their time studying. If their funding does not meet the requirements then they cannot make up the difference by working elsewhere. The only place that may be viable is teaching at the university, however they are bound by a monthly limit on teaching hours. But with a reduction in international students and courses disappearing this may no longer be a viable option.

This level of funding may not be sufficient to meet the proposed secure means of support. In May 2025 a wellbeing study conducted by Fedon, a union for PhD students, noted that doctoral candidates from outside of the EEA/EFTA are more likely to be partially funded or completely unfunded in comparison to their Icelandic and EEA/EFTA counterparts [5]. This insufficient funding could lead to many PhD candidates being forced to leave halfway through their studies. By forcing doctoral students to abandon their research midway, the regulation directly undermines research that the university has already invested in as well as making Iceland a less reliable international collaborator, turning away prospective PhD students and weakening the university's research capacity. This does serious damage to Icelandic higher education's international standing.

Students with children

Under Article 5 of the proposal, each child younger than 18 adds a factor of 0.3 to the overall requirement. The draft does not specify whether a student with a child would have a factor of

0.75 or a factor of 1.05, if the child is taken into consideration. If a student with one child must show 1.05 of ISK 501,186 (about ISK 526,000 a month) rather than the ISK 375,890 per month then that is far beyond what a student restricted to 60% employment can realistically earn. To prevent any uncertainty and the stress placed on the individual and their child/children, Röskva calls for the requirements for students with children to be stated clearly.

The combined effect with the implementation of tuition fees

The regulation cannot be assessed on its own. From autumn 2027, students from outside the EEA/EFTA will pay up to ISK 5,150,000 a year in tuition at HÍ and HÍ at Hólar. For a student in the second highest bracket, the cost of their first year rises from ISK 3,111,864 under the previous requirements to ISK 7,900,680 in 2027. That figure covers funds to be shown and fees to be paid. The comparison is shown below:

	2025 (ISK)	**2027 (ISK)**
Financial proof of sufficient funds	*2,970,864*	*4,510,680*
Tuition fees/Registration fee	*75,000*	*3,250,000*
Application processing fee for non-EEA/EFTA applicants	*0*	*20,000*
Student residence permit fee	*16,000*	*70,000*
Health insurance for first six months	*50,000*	*50,000*
Total	***3,111,864***	***7,900,680***

Changes to the cost of residence permit applications, tuition fees and the proposed change for the secure means of support have been announced within a short period of time. These measures are likely to significantly impact the number of non-EEA students at the university who cannot afford to study here. This group makes up 59% of international students and 11% of all students [4]. Röskva is concerned that by making it increasingly difficult to be a student studying in Iceland from outside the EEA/EFTA, the number of students in this group will decline sharply resulting in serious consequences for the university's finances, its diversity of courses and its research environment.

Effects on universities

A sharp decline in non-EEA/EFTA students will have far reaching consequences beyond this group. Programmes that rely on international enrolment risk losing funding and, in the worst case scenario, closing altogether. This will reduce the range of degrees available to all students. The knock-on effect may have an impact on university staff employment as fewer students and fewer available courses to teach may lead to a loss of jobs for academics and scholars.

The share of international students and the extent of international research cooperation also weigh heavily in global university rankings thereby negatively impacting the university's international standing.

Norway's experiences highlight how increasing the cost of education detrimentally impacts domestic universities. When it introduced tuition fees for students from outside the EEA/EFTA in 2023, new enrolments from that group fell by 80%, with the steepest declines in STEM subjects [6]. The ministry of Higher Education and Research relaxed the policy in 2025, giving universities more discretion over fees, citing a need for greater adaptability in recruitment and labour market needs as well as the importance of attracting international talent to support Norway's knowledge economy.

When the cost of studying rises steeply for one group of students many decide to go elsewhere and the universities, the research environment and the skills the country requires are all affected. The draft regulation raises the cost of studying in Iceland through a different mechanism, but the likely effect on student numbers is the same. Iceland has a smaller higher education community, with less funding and far less room to absorb such a decline.

Given the Icelandic government's official labour policy includes measures aimed at increasing the number of university graduates with STEM qualifications, the consequences of Norway's experience are of particular significance and their experience should form the foundation for the Icelandic government's view on access to higher education for non-EEA/EFTA students. Röskva asks how the government expects to meet this aim while introducing measures that are likely to reduce the number of non-EEA/EFTA students in these subjects.

Comparison to other Nordic countries

The government has said that the proposal is intended to bring Iceland in line with the other Nordic countries. This is puzzling, because the published secure means of support requirements for 2026 in the other Nordic countries are all considerably lower than Iceland's current requirement, even before the proposed increase. The table below shows the equivalent requirements converted into Icelandic krónur at Landsbankinn's exchange rates on 12 November 2026 [7, 8, 9, 10].

	Month (ISK)	Year (ISK)
Finland	*109,728*	*1,316,736*
Sweden	*132,070*	*1,584,846*
Denmark	*136,245*	*1,634,938*
Norway	*201,065*	*2,211,717*
Iceland (2025)	*247,572*	*2,970,864*
Iceland (2026)	*259,951*	*3,119,412*
Iceland (2027)	*375,890*	*4,510,680*

Living costs differ between countries, but Norway is a comparable country with a higher cost of living than the other Nordics. However, even Norway's requirements are little more than half of the proposed Icelandic figure of ISK 375,890. Given that the draft gives no explanation of how the increase was calculated, Röskva asks the Ministry to explain how the figures were reached and why they differ so much from those of other Nordic countries if the desired outcome of this regulation is to bring Iceland in line with them.

Process and timing

The draft states that if confirmed the regulation would take effect on 1 January 2027 and apply to all applications, including pending ones (Article 19 of the draft). Applications to HÍ for the 2027–2028 academic year open in December whilst the details and certainty around this proposed regulation remain unclear. Prospective students are therefore being asked to apply without knowing what they will be required to pay or show. Additionally, those that are half-way through their studies will not be given exemption to these rules and consequently, many students who do not have the funds will be forced to leave midway through their studies. The consultation period between the draft proposition and its enactment is also short, given its wide ranging impact on all residents from outside the EEA/EFTA as well as students from this group.

Conclusion

Röskva recognises that the state sets requirements for secure means of support. As drafted, however, the regulation would require a student from outside the EEA/EFTA to show ISK 4,510,680 before applying and then to sustain a monthly income of ISK 375,890. Many students cannot realistically earn this whilst tied to a 60% work limit. This also raises the question of why 0.75 is the chosen factor when students can only work for a maximum factor of 0.6. The draft does not explain how the figure was reached or why it suits students, and it is unclear how it

applies to students with children. For funded doctoral candidates, whose grants may not meet the requirement, and students who cannot show these amounts, the consequence could be leaving mid-degree.

Taken together with the new tuition fees, these measures are likely to sharply reduce the number of students from outside the EEA/EFTA at HÍ. As this review has set out, this decline will affect programme funding, the range of degrees available to all students and the university's research environment and international standing.

Röskva therefore asks the Ministry of Justice to reconsider the draft in its current form. We ask that the basis for the calculation be published, that the expected effect on international enrolment and on the university be assessed and that students and the university be consulted. Röskva would welcome a meeting with the Ministry to discuss these concerns.

On behalf of Röskva,

Robert James Chantrey, international officer of Röskva

References:

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