EUI CENTRE FOR MEDIA PLURALISM AND MEDIA FREEDOM

ROBERT SCHUMAN CENTRE

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, THE REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2021

Country report: Finland

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Research Project Report
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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States of the European Union and in candidate countries. This narrative report has been produced on the basis of the implementation of the MPM carried out in 2021. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological notes

Authorship and review

The CMPF partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire that was developed by the CMPF.
In Finland *the CMPF partnered with* Marianne Mäntyoja and Ville Manninen (University of Vaasa)**,** *who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.*
Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

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The digital dimension

The Monitor does not consider the digital dimension to be an isolated area but, rather, as being intertwined with the traditional media and the existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor also extracts digital-specific risk scores, and the report contains a specific analysis of risks related to the digital news environment.

The calculation of risk

The results for each thematic area and indicator are presented on a scale from 0 to 100%.
Scores between 0 and 33%: low risk
Scores between 34 and 66%: medium risk
Scores between 67 and 100%: high risk
With regard to indicators, scores of 0 are rated 3% while scores of 100 are rated 97% by default, in order to avoid an assessment of total absence, or certainty, of risk.

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2022 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2022, available on: http://cmpf.eui.eu/media-pluralism-monitor/.

2. Introduction

- **Country overview.** Population-wise, Finland is a small country with 5 548 241 inhabitants (Official Statistics of Finland, 2022). With a land area of approximately 304 000 square kilometers, Finland is a relatively sparsely populated country (National Land Survey of Finland, 2021).

- **Languages.** Finland has two official languages: Finnish (86.5 per cent of population) and Swedish (5.2 per cent). The language of the native Sámi people is recognized as a minority language, but only 0.04 per cent speak it as their first language. Russian (1.6 per cent) and Estonian (0.9 per cent) are the most common foreign languages. (Official Statistics of Finland, 2022)

- **Minorities.** Three minorities are recognized by law: the Swedish-speaking Finns, the Sámi and the Romany. The Romany are estimated around 10 000 – 12 000 (or 0.2 per cent). The self-governing body of the Sámi people recognizes 10 759 members, i.e. 0.2 per cent (Finnish Institute for Health and Welfare, 2021; Sámediggi, 2020). By citizenship, the three biggest minority groups are Estonians (0.9 per cent), Russians (0.5 per cent), and Iraqi (0.3). The number of foreign-language speakers grew by 25 195 persons in 2021, which is the largest increase in at least 40 years. (Official Statistics of Finland, 2022)

- **Economic situation.** The Ministry of Finance has predicted Finland's GDP to have grown 3.4 per cent in 2021 and that the growth will continue at 3.0 per cent in 2022 (Ministry of Finance, 2021).

- **Political situation.** Finland's political landscape has tended to be fairly stable. Two new parties have risen to prominence post-2000: the Greens and the Finns Party. One of three historically strong parties, the centrist Center Party, has declined. The other two long-ruling parties, the center-left Social Democratic Party and the center-right National Coalition Party have retained their relative standings. Finland's current government is a center-left and liberal coalition of five parties. They hold 117 of the parliament's 200 seats. Two major parties (with 38 seats each) are in opposition.

- **Media Market.** The Finnish media landscape is marked by the presence of a strong PSM corporation, Yleisradio, and a robust newspaper sector. Yleisradio is Finland's dominant TV and radio broadcaster. The total value of the Finnish mass media market in 2020 was 3.8 billion euros, with television as the leading sector (at 1.34 billion, PSM included), followed by newspapers (0.84 billion). Finns' media consumption is rapidly moving online. The internet has since 2014 been Finns' most used medium, and in 2020 little over half of the average Finns' media consumption took place online (Official Statistics Finland, 2020).

- **Regulatory Environment.** Media regulation in Finland is light. Content restrictions apply mainly to content that is either illegal or harmful to children. Content requirements apply mainly to PSM and private broadcasters operating under a "public interest" licence. Media ownership concentration is regulated on a case-by-case basis as part of general market competition regulation. No major legislative or regulatory changes have taken place in recent years.

- **COVID-19.** Finland has coped relatively well with the COVID-19 pandemic. The Finnish media has not suffered as badly from the pandemic as some other industries, and many of the media sectors' revenues have recovered close to or even slightly above the level before the pandemic. Especially for smaller companies the pandemic has nonetheless caused financial instability to which the government has not fully responded.

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- **War in Ukraine.** The attack has not caused significant changes in the Finnish media and information sphere yet. Experts have warned that Russia might target Finland with disinformation campaigns, cyber attacks and other hybrid operations as retaliation for supporting Ukraine and renouncing the attack. Some Finnish news websites have been blocked in Russia for their coverage of the war.

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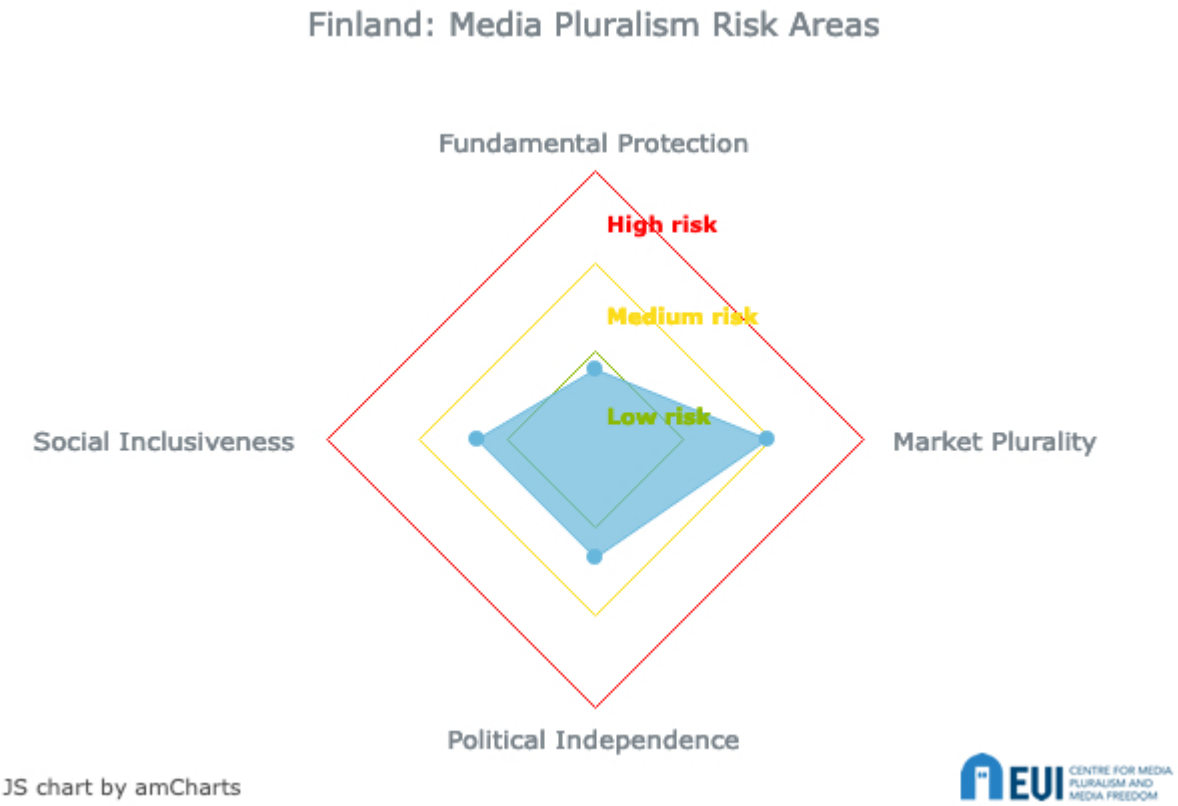
3. Results of the data collection: Assessment of the risks to media pluralism



The **Fundamental protection** area scores low risk, at 26 per cent. Fundamental protection in Finland stands on a strong foundation, and basic rights such as freedom of expression and right to information are explicitly codified in Finnish legislation. Some legal amendments implemented in recent years indicate further positive development. At the same time increasing the authorities' powers may potentially increase the risk level in the future. For the time being, Finland's risk score stays practically unchanged from MPM 2021, since the effects of these changes are not yet known. The indicator for Protection of right to information scores the worst, at lower end of the medium risk range, as some legal reforms are still pending. In the indicator for Protection of freedom of expression, the risk-increasing legal issues remain. Namely, the regulation could be seen as overly restrictive: blasphemy and defamation are still criminalized. The fairly low broadband coverage remains an issue, while the average speed of the internet has slightly improved since the previous report.

The level of risk ascribed to the **Market Plurality** area has decreased from the last MPM assessment, but still reaches the upper level of medium risk (64 per cent). In comparison to MPM 2021, improvements were seen in indicators Transparency to media ownership and Media viability. The former is due to changes in legislation. The latter stems from a slight upward trend in the economy as signs of financial recovery were seen throughout 2021. Sustainability issues as well as high concentration of the news media are underlying trends that were already at play before the COVID-19 pandemic. Both News media concentration and Online platforms concentration and competition enforcement reach high risk. In both indicators, Finland's traditional low-intervention approach is shown. In addition, legal amendments to enforce competition are still in progress.

The **Political Independence** is at 44 per cent, indicating medium risk. Throughout the area, the risk is elevated mainly by the absence of regulation; the lack of rules to prevent conflicts of interest and political control; the shortcomings of the rules on impartiality of the PSM and commercial media; the shortcomings of

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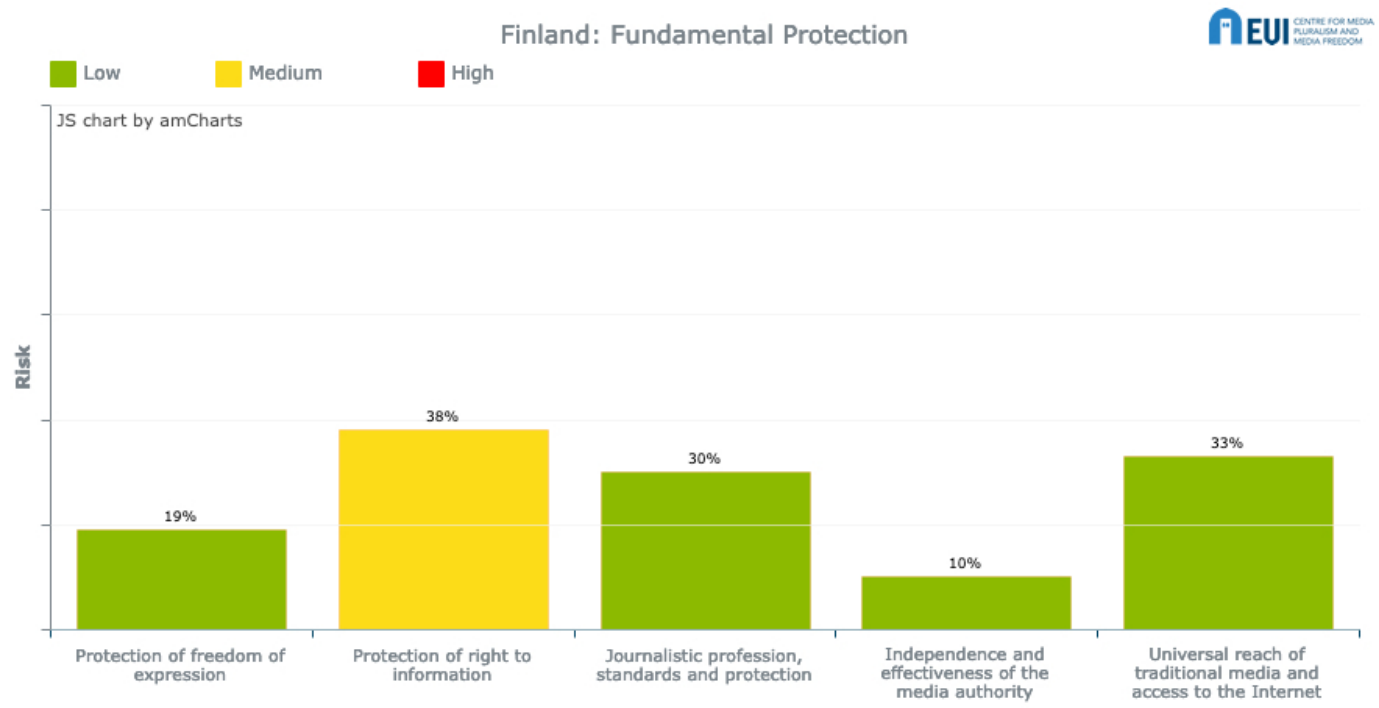
the rules on electoral campaign spending in terms of transparency. The indicator Independence of PSM governance and funding reaches the highest risk score, yet staying well within the medium risk range. The risk stems from political influence in the appointment procedures of the PSM corporation Yleisradio, that is built in the system. In practice, however, neither major commercial media outlets nor Yleisradio are under political control, even though no law prevents it. While the overall situation is good, there is room for improvement. Only one of the indicators, State regulation of resources and support to media sector, stays below the medium risk level**.** The public support to the media sector has traditionally been measly and may be seen as exclusionary against some types of media. There are also signs that self-regulation is not fully effective in guaranteeing editorial autonomy.

The **Social Inclusiveness** area scores medium risk (44 per cent). The risk score for the indicator Access to media for minorities has not changed compared to MPM2021. The medium risk is mostly related to minorities not recognized by law. The worst result in this area, although slightly improving from the previous report, is for Access to media for local/regional communities and for community media, that scores a high risk; The state does not recognise local media nor supports it through subsidies. Improvements in Access to media for women is also seen, which overall reflects the relatively low gender gap in the society. Media literacy in Finland is widely promoted in political and practical level, scoring again very low risk. The indicator for Protection against illegal and harmful speech scores medium risk, which means that the impact of such speech has so far been moderate but more governmental and non-governmental initiatives are needed.

3.1. Fundamental Protection (26% - low risk)

The Fundamental Protection indicators represent the regulatory backbone of the media sector in every contemporary democracy. They measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; the independence and effectiveness of the national regulatory bodies that have the competence to regulate the media sector, and the reach of traditional media and access to the Internet.



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Finland's overall risk score for the Fundamental Protection area is 26 per cent, well within the low-risk range. Only one indicator, Protection of Right to Information, reaches the medium risk range. No such changes were seen in 2021 that would affect the actual scoring.

Generally, Finland is a free and protected environment for journalists and media professionals. Freedom of expression is codified in the constitution and the legal framework is well-developed, and in tune with international treaties. There is no evidence of unlawful interference with the exercise of these rights (Reporters Without Borders, 2021; Freedom House, 2021; Aarnio et al., 2020). However, a guilty verdict for three journalists of the leading daily newspaper Helsingin Sanomat might bring the situation to a new light (see Mapping Media Freedom, 2021). Strategic litigation is deterred by law: the losing side of a court case covers the legal expenses of the winning side. If a plaintiff brings to court a frivolous case, they may be ordered to cover the defendanfs legal expenses even if they technically win the case. The risk score for the indicator Protection of freedom of expression (19 per cent) is only elevated by the continued criminalization of blasphemy and defamation, the latter of which can be punished with up to two years in prison (Criminal Code of Finland, n.d.).

The indicator **Protection of Right to Information** acquires a medium risk score (38 per cent). While Finland has codified its citizens' extensive right to Information (Constitution of Finland 731/1999, section 12), access to documents and information held by officials is often delayed or denied, due to either misinformed or willfully unlawful practice (e.g. Hiltunen, 2019; Honkonen, 2021). As a separate issue, Finland has yet to implement legislation for universal whistleblower protection.

The risk score for **Journalistic profession, standards and protection** is within the low-risk range (30 per cent). The State generally refrains from interfering with journalism, and the legislative framework provides Finnish journalists with relative security. In short, working as a journalist is unrestricted and any citizen is able to benefit from shield-laws protecting source confidentiality. Further, harrassment of journalists for their work is now under public prosecution rather than a matter of civil lawsuit. Nevertheless, online harassment of journalists is a growing concern, even though it has been addressed by legal amendments. Meanwhile, journalists have in recent years been affected by media companies’ financial insecurity. The impact of COVID-19 has not been as devastating for media as it has been for some other industries and so the temporary extension of unemployment benefits to freelance media workers has been left to expire.

The competent media authority, the Finnish Transport and Communications Agency, has only limited remit to regulate media (Act on the Finnish Transport and Communications Authority 935/2018, section 2). There is no evidence of malpractice in the exercise of these powers: Finnish media regulation is fair and transparent. Risk score for the indicator **Independence and effectiveness of the media authority** (10 per cent) is only elevated by two factors: the government has partial budgetary control over the agency, and the agency's current budget does not appear entirely sufficient (Traficom, 2021). As such, the agency's actual performance should warrant close attention in the future.

The indicator **Universal reach of traditional media and access to the Internet** stays just below the medium risk threshold, scoring low risk (33 per cent). The population is well-covered by public service radio and television broadcasts (Digita 2022a, 2022b; Traficom, 2020), and almost all households have some form of broadband internet subscription (European Commission, 2021a). The average internet connection speed is relatively fast (in excess of 55 Mb/s), and service providers adhere to the principles of net neutrality (e.g. Aarnio et al., 2020). However, almost one-quarter of the population does not have access to a high

speed (30 Mb/s or faster) internet connection. Risk is also increased by the high concentration of the ISP market, with the four largest companies controlling 98 per cent of the sector (Traficom, 2022a, 2022b).

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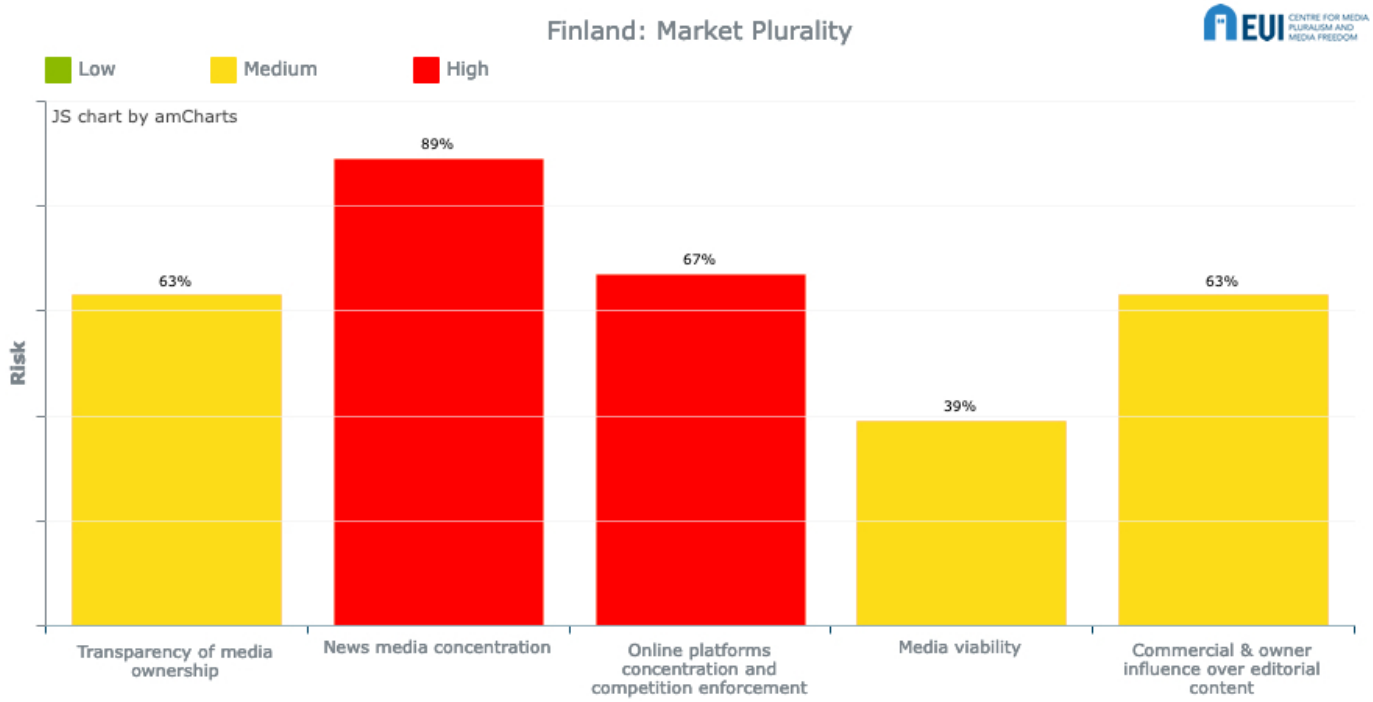
3.2. Market Plurality (64% - medium risk)

The Market Plurality area focuses on the economic risks to media pluralism which derive from a lack of transparency and the concentration of ownership, the sustainability of the media industry, the exposure of journalism to commercial interests. The first indicator examines the existence and effectiveness of provisions on the transparency of media ownership. Lack of competition and external pluralism are assessed separately for the news media (production of the news) and for the online platforms (gateways to the news), and we consider separately horizontal and cross-media concentration; the concentration of the online advertising market; and the role of competition enforcement. The indicator on media viability measures the trends in revenues and employment, in relation to GDP trends. The last indicator aims to assess the risks to market plurality that are posed by business interests, in relation to the production of editorial content, both from the influence of commerce and owners.



The overall risk score for the Market Plurality area is 64 per cent, indicating a medium risk. Finland's risk score improved by 10 percentage points from high to medium risk compared to the previous reporting period. This is due to two factors: changes in legislation regarding transparency of media ownership and the media sector recovering (at least in part) from the downfall caused by the COVID-19 pandemic.

The indicator **Transparency of media ownership** produces a medium risk score (63 per cent). In the previous reporting period Finland's risk score reached 75 per cent, indicating high risk. General transparency legislation exists. In addition, at the beginning of the reporting period of the MPM2022, transparency of media ownership was improved by legislation; on January 1 st, 2021, amendments to the Act on Electronic Communications Services (917/2014) came into force setting Finland's legislation in line with Article 5(2) of the revised Audiovisual Media Services Directive (AVMSD). Under 4a § of the renewed law, audiovisual media service providers now have to communicate their ownership structure. The legal definition of audiovisual media (per section 3 paragraph 2 of 917/2014) covers terrestrial and cable television and various online streaming services (both free and subscription services). However, one might still contest the level of transparency provided by the amendment: the law calls for the publication of

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information on "ownership structure", but the government proposal (often used in interpreting how the law should be applied) for the law (HE 98/2020 vp) specifies that no personal data ("such as names") should be published. It is also possible and legal for media companies to obscure their ultimate, beneficial owners through offshore holding companies. While ownership data is theoretically available to all, acquiring it is practically too cumbersome for a layperson. Most major media companies voluntarily provide some transparency, while few are more opaque (Ala-Fossi et al., 2018).

News media concentration in Finland is very high, and this indicator produces a high (89 per cent) risk score. Currently, all Finnish media sectors are either highly or intermediately concentrated. From MPM2021 to MPM2022, the only notable change was the slight decline in four largest audiovisual media owners' market combined market share, which decreased by 6 percentage points. This was due to video-on-demand (VOD) services gaining market share. Legislation sets no a priori restrictions to ownership concentration, although the Finnish Competition and Consumer Authority may intervene in large companies' mergers. The FCCA cannot intervene in market concentration resulting from businesses exiting the sector or mergers of small companies. Cross-media ownership is also concentrated, although not as severely as within individual sectors. Comprehensive data on online news media concentration is not available, but the most popular websites aimed at Finnish audiences are owned by a handful of cross-media companies.

The risk score for indicator **Online platforms concentration and competition enforcement** acquires a high risk assessment (67 per cent). On the upside, only a minority of Finns accesses online content through intermediaries, such as social media and news aggregators. This limits the intermediaries' power to filter content. As with traditional media, the online market appears to be highly concentrated, with the Finnish Competition and Consumer Authority ill-equipped to curb the concentration. The risk is also increased by the public service broadcaster Yleisradio: no effective mechanism exists that would adjust Yleisradio’s funding to prevent it from undermining commercial media. However, amendments to the Act on Yleisradio are set to enter into force in summer 2022 (Ministry of Transport and Communications, 2022). These amendments aim at effectively delimiting Yleisradio’s online services. Finland has yet to implement either digital services tax or directive 2019/790, which would bring changes to the Copyright Act and enforce competition.

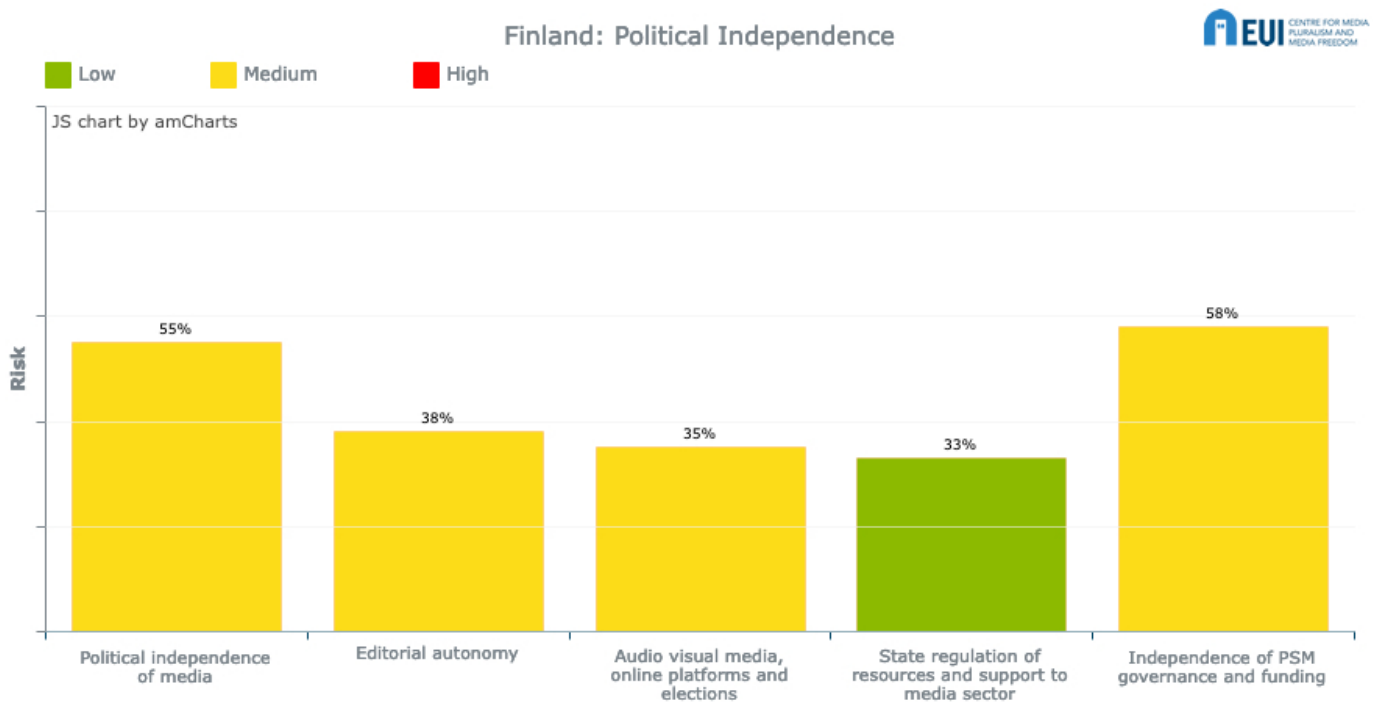
The indicator **Media viability** produces a (39 per cent) medium risk score, significantly improving from the previous reporting period. This is a result of the media industry returning from the steep fall in 2020 caused by the pandemic. Advertising revenues increased in almost all media sectors (from +1 to +18 per cent change in 2021 compared to 2020, movie and magazine sectors excluded). Among traditional media, print advanced the least while advertising spending on radio advanced the most (Kantar, 2022). The absence of detailed data regarding digital native and local media sectors is an issue: it is impossible to follow the development (or regression) of these sectors. The main driver in the positive turn of 2021 was online advertising that advanced the most, by 21 per cent (Kantar, 2022). For the newspaper sector, the positive turn in 2021 can be seen as a post-pandemic return to normal rather than a reversal of a long-term downward trend. Especially local newspapers that are dependent on advertising revenue have been heavily hit by the COVID-19 pandemic. On a positive note, media companies are putting in effort to find new revenue streams as well as improving customer retention. Finland has provided some support to its struggling media industry already before the COVID-19 pandemic and also during it, in the form of a one-time grant scheme in 2020. Overall, the state support has been meagre and an eminent need for a permanent support mechanism has been recognized (Wirén et al., 2021). However, both a government grant and permanent support were left out of the government budget for 2022 citing weak economic situation (Virranta, 2021). Nevertheless, there is an overall positive development as during the reporting

period advertising revenue slightly exceeded advertising revenue reported in 2019 (Kantar, 2022). This is positively reflected on the employment rate of journalists: after several years, newspaper chains began hiring again (Arola, 2021).

The indicator **Commercial & owner influence over editorial content** reaches a medium (63 per cent) risk score. The risk is elevated mostly by lacking or ambiguous regulation. No laws prohibit commercial or political influence on the hiring of journalists, although general anti-discrimination legislation applies. No guidelines or regulations prohibit journalists from working simultaneously in advertising, nor are advertorials prohibited. While ads that are fully disguised as news are prohibited, they are a growing concern not fully addressed by current regulation. The self-regulatory Guidelines for Journalists oblige journalists to dismiss non-editorial influence, and journalists largely respect this duty. However, these guidelines are not in all cases effective in preventing commercial influence which is a growing problem, for example to local sheets highly dependent on advertising (Hiltunen, 2020).

3.3. Political Independence (44% - medium risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



Finland's overall risk score for the Political Independence area is 44 per cent - medium risk. Only one indicator, State regulation of resources and support to media sector, stays below the threshold for medium risk. The overall situation is practically unchanged from the previous report, MPM2021.

The indicator **Political independence of media** reaches a medium risk score (55 per cent). The risk stems almost entirely from absent regulation: no law prevents politicised control of the media. However, based on

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the review of stockholder data, none of the leading media in any sector are under political control. The risk score has also increased slightly due to a lack of data on online media. While politicised control of online media seems like a non-issue, the exact state of affairs (e.g. Finns' total consumption of niche partisan websites) is unclear.

The indicator **Editorial autonomy** indicates medium risk (38 per cent) for Finland. Despite journalists' self-regulatory guidelines asserting the sanctity of editorial autonomy, journalists face a level of political pressure which, occasionally, manages to influence editorial decisions. The aforementioned risk level is calculated with caution in mind and reported attempts at political intervention are taken as a risk-increasing factor. This study's national Group of Experts agreed with the country team's assessment. Additional comments by the Group of Experts indicate that the issue is a growing concern on a municipal level (especially combined with commercial pressure) and especially prevalent in smaller local newspapers. That is confirmed by an earlier study directed towards editors-in-chief of local newspapers and daily newspapers reporting that 81.5 per cent of respondents have experienced attempts at influencing the editorial content by municipal decision-makers (News Media Finland, 2020). Nevertheless, journalists' self-regulatory guidelines and generally strong professional pride are keeping the risk level at the lower end of the medium-risk range.

The indicator **Audiovisual media, online platforms and elections** produces a medium (35 per cent) risk score. There is no compelling evidence of political bias in either private or public media around elections (e.g. Borg, Kestilä-Kekkonen & Wass, 2020). There is legislation aimed at making political advertising transparent, and there is no evidence that online platforms are acting against their outspoken policy. Based on reviewing the Facebook ad repository, political advertising seems to be fairly well labelled as such. The risk score is increased by the lack of legislation effectively forcing media to provide a platform to all political candidates. The public service broadcaster Yleisradio has a limited legal duty to treat political parties evenhandedly, but this obligation is difficult to enforce. Lastly, political candidates and parties are rather opaque about their campaign funding and the use thereof, which also increases the risk. Despite research gaps and lack of data (e.g., no research on the 2021 municipal elections or data on commercial audiovisual media's practices in selling advertising space), based on previous studies and reviews, as well as statements by the Group of Experts, Finland's estimated (medium-low) risk score is justified.

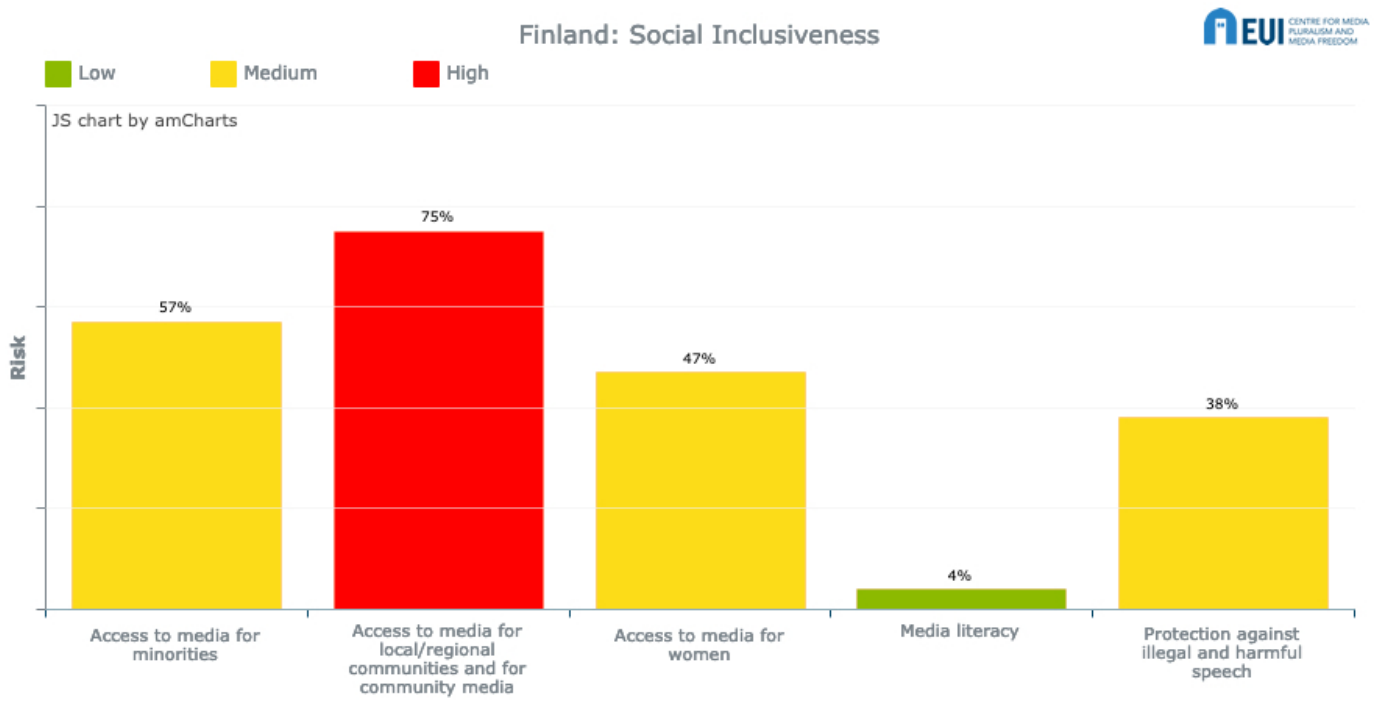
State regulation of resources and support to media sector acquires a 33 per cent risk score, which is very close to medium risk, but still low. The framework for regulation of, and possible intervention in media is mostly fair and transparent. Regulation-wise, the lack of oversight of allocating state advertising is a risk factor - no aggregate data of this form of advertisement spending is collected. Furthermore, the criteria for distributing state media subsidies (however measly) could be seen as exclusionary, for example against content produced in certain languages. In 2020, in response to the COVID-19 pandemic, the government allotted 7.5 million euros to be granted out to journalism-producing companies, based on universal economic criteria (Ministry of Transport and Communications, 2020b). In addition to said one-time grant scheme, a group of representatives and experts appointed by the Ministry of Transport and Communications, suggested a permanent grant mechanisms to support journalism (Wirén et al., 2021). However, in 2021, both were left out of the government budget for 2022 citing a weak economic situation (Virranta, 2021).

The indicator **Independence of PSM governance and funding** reaches a medium (58 per cent) risk score. The risk score is elevated by the appointment procedures of Yleisradio's top leadership: its Administrative Council is appointed by the national parliament, traditionally from among MPs (although this is not required by law). Political influence is thus built in to the system. Nevertheless, the politician-run Council traditionally

refrains from intervening in editorial decisions, as its legal mandate (albeit in parts vague) focuses on strategic decisions and oversight. Positively, the PSM Corporation Yleisradio enjoys sufficient and stable funding. At the same time, Yleisradio has been criticized for overstepping its remit, especially online (e.g. European Commission 2021b). Amendments to section 7 of the Act on Yleisradio (1380/1993) entered parliamentary deliberation in December 2021 and were passed in March 2022. The aim is to make the text-based online content published by Yleisradio more closely linked to its audio or video content broadcasts, effectively limiting the provision of text-based PSM content online. The amendment is hoped to clarify the current regulation in terms of the operating environment for commercial media (Ministry of Transport and Communications, 2022).

3.4. Social Inclusiveness (44% - medium risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against illegal and harmful speech.



Finland's overall risk score for the Social Inclusiveness area is 44 per cent, i.e. medium risk. However, indicator-specific risk scores range from low to high risk. The broad view of the area's risk pattern has not changed since the previous data collection period. Some local changes have taken place, increasing risk levels in some indicators but reducing it in others.

The indicator **Access to media for minorities** produces a (57 per cent) medium risk score. Minorities recognized by law are in a fairly good position, while as a whole media does not fully reflect to society as a whole. National minorities recognized by law, the Swedish speaking Finns and the native Sámi, are served relatively well in terms of air time; public service media covers national minorities, and the amount of available media content is proportionate to the minorities' populations (Act on Yleisradio Oy 1380/1993, Section 7). However, neither public service nor privately owned media serve other minority groups

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effectively. The COVID-19 pandemic brought only temporary positive effects as the PSM corporation started publishing pandemic-related news in other minority-languages on their website and social media but this initiative ended in May 2021. Overall, unofficial minority-languages other than Russian and English were served only through the PSM website and social media. The Finnish legislation aims to provide access to media for people with various disabilities, and these provisions are thoroughly implemented. However, there are still some shortcomings in the availability, usability and quality of said services. Changes in the legislation came to force in January 2021 (Amendment to the Act on Services in electronic Communications 1207/2020) which expanded the subtitling requirements for video-on-demand services; regulatory authorities have been granted more powers to enforce the regulation; and the law now specifies that subtitles must be provided in adequate quality (Act on Services in electronic Communications 917/2014, Section 211). At the time of writing this in early 2022, Finland is in the process of transposing the EU Accessibility Act onto national legislation. The new law would improve the media access of people with disabilities on several accounts, but would continue to exclude digital newspapers from accessibility regulation. Overall, the accessibility policy is rather extensive and improving gradually, but there are still significant shortcomings in terms of scope and implementation.

Access to media for local/regional communities and for community media in Finland is in high risk, reaching a 75 per cent risk score. This score is slightly lower than in MPM2021, but the reduction only reflects changes in the MPM measurement and not effective changes on the ground. Local, regional and community media exist in parts of the country, while many communities and locales (depending on the definition) go unserved. Local, regional or community media enjoy no state-sponsored support schemes or protective regulation. Hence, the field is underdeveloped and in significant parts relies on the PSM corporation Yleisradio. Even though not legally obliged, Yleisradio still maintains 24 regional offices, providing sufficient representation of the main language groups. A clear need for a support mechanism for community media has been recognized (Wirén et al., 2021). However, no change on the matter is expected in the near future.

The indicator **Access to media for women** reaches a medium (47 per cent) risk score. This is 15 per cent points lower than in MPM2021 and is due to slightly improved representation of women in media content and in leading media positions. Women still continue to be underrepresented in most media companies' management, although not by far. The public service broadcaster Yleisradio sets a leading example: it maintains a comprehensive gender equality policy, and its management boards have equal gender distributions. Timely research on gender representation on media is scarce. However, the Reuters Institute Digital News Report 2021 found very little difference between men and women in whether they consider the presence and representation of their own gender in the news fair and proportionate (Reunanen et al., 2021). Gender equality in the news can be considered relatively good in Finland, as reflecting the overall gender gap in society (Djerf-Pierre, 2020).

Media literacy acquires a low (4 per cent) risk score, which is unchanged from last MPM implementation. Finland has a generally strong media literacy policy. For the first time, the national-level media literacy education guidelines (published in 2019) now acknowledge the importance of media literacy in all age groups (see Salomaa & Palsa, 2019). Media literacy education in Finland is especially prominent in schools, but is also available in non-formal education, making it available for also adults and seniors. Over three-quarters of Finns have basic or above basic digital skills (Eurostat, 2022). For better results, the national guidelines should be broader and more specific in terms of how to promote media literacy among the elderly (Rivinen, 2021).

The indicator **Protection against illegal and harmful speech** reaches a medium (38 per cent) risk which is 7 percentage points higher compared to the previous reporting period, MPM2021. Disinformation is not encountered in a large scale in Finland (Horowitz et al., 2021). However, it is a growing concern. So far, self-regulation in journalism and governmental efforts against disinformation have been fairly effective. However, the civil society is lagging behind in activity, with the exception of some initiatives. Government's Defence Report published in September 2021 shows that information defence has become an increasingly critical part of national defence and a part of the Finnish Defence Forces' normal activity (Government of Finland, 2021a). Per a planned amendment to the Criminal Code's Chapter 6, Section 5, gender-based hatred would in the future be grounds for increasing the punishment (Ministry of Justice, 2021). Granting officials more resources and powers to tackle disinformation and hate speech means the line between justifiable preventative measures and unacceptable limits on freedom of expression must be closely monitored.

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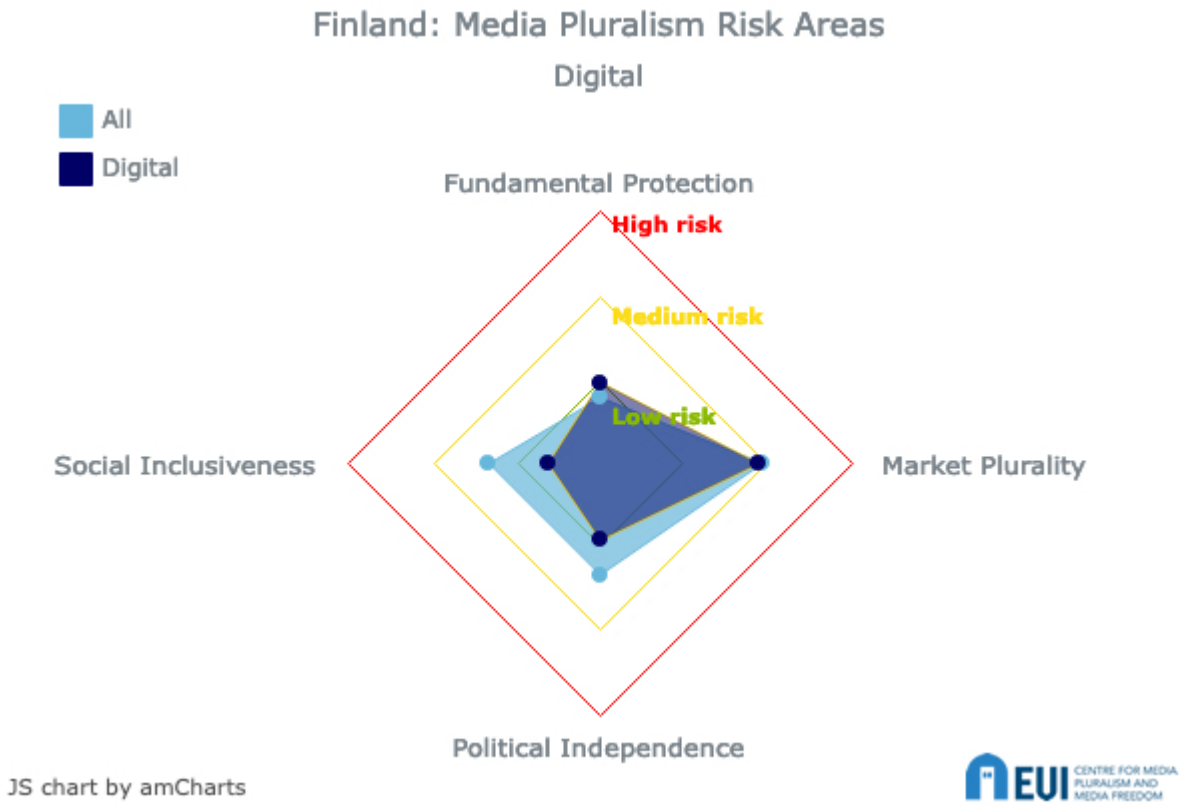
4. Pluralism in the online environment: assessment of the risks



Fundamental Protection (32 per cent, Low Risk)

The area of Fundamental Protection contains six sub-indicators that measure digital risks, and their results are mixed. On the upside, Finnish legislation and regulation regarding digital media are up to date with international progress (e.g. with regards to GDPR and Net Neutrality). Most Finnish households have a broadband Internet connection, and they are available to almost all households. On the downside, high-speed connections (30 Mb/s and up) are unavailable to almost a quarter of households. Earlier policy choices have favoured the development of mobile connections over landlines. This policy has expanded the availability of affordable (mobile) broadband connections but undercut the availability of high-speed (cable) connections.

Freedom of expression is regulated the same online and offline. This includes the continued criminalization of defamation (Criminal Code 39/1889, chapter 24 section 9) and ethnic agitation (Criminal Code 39/1889, Chapter 11 section 10) and blasphemy (Criminal Code 39/1889, Chapter 17 section 10), for which the punishments are potentially harsh. This ties in with another legislative issue: the possibility for authorities to acquire internet traffic data from service providers in order to investigate a seemingly minor offence, aggravated defamation. Specifically, police can acquire the data if the suspected crime took place over the Internet and for which the punishment can be two years of imprisonment (or more). This is stated in Chapter 10, Section 6, paragraph 2 of the Coercive Measures Act (806/2011). Coincidentally, aggravated defamation carries a maximum penalty of two years in prison, just enough to allow internet traffic data acquisition during police investigations. Changes made to a slew of data protection, privacy and policing laws starting 2019 have expanded authorities' powers in criminal investigations and pre-emptive operations (Government of Finland, 2021c). Currently, it is impossible to assess whether the actions under the surveillance laws are proportionate since the scale of surveillance measures is not publicly reported (Electronic Frontier Finland, 2021). However, the Data protection Ombudsman is notified by the intelligence

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officials of all decisions regarding the use of intelligence methods (Government of Finland, 2021b).

As part of a continuing trend, journalists are more and more commonly targeted by online harassment, mostly in the form of threats and smear campaigns. Personal attacks on social media and other online platforms might become increasingly widespread (Hiltunen, 2021). Statistically men and women experience roughly equal amounts of harassment, while women journalists report more mental strain, more self-censorship, and less confidence in their employer's ability to resist external interference (Hiltunen & Suuronen, 2020). Sophisticated attacks against journalists' digital safety, such as hacking, still seem to be rare. No attacks or infringement of digital rights seem to originate from the Finnish state but rather from individuals or, in some cases, a foreign state.

Market Plurality (63 per cent, Medium Risk)

Market Plurality contains 11 sub-indicators that include specific variables on the digital risk. Finland's risk score is still negatively affected by the lack of necessary data. The scarce data that is available points mostly to risks, but also includes some positive details.

The national law is still rather vague in its transparency requirements for the digital news media sector. The law now requires audiovisual media service providers to publish their ownership structure, therefore covering only parts of the digital news media sector. The legislation's documentation also specifies that no personal details, such as names or addresses, should be published. Most digital news media outlets still publish some form of ownership data out of goodwill or in compliance with normal transparency legislation.

The Finnish Competition and Consumer Authority can intervene in advertising malpractices and monopolistic development in both online and offline environments. Unfortunately, however, this competence is partly theoretical, as the FCCA has little recourse against global digital monopolies like Google and Facebook. Finland has neither introduced a digital services tax nor implemented the Directive 2019/790, which aims to strengthen the rights of authors in relation to digital platforms. However, Finland is in the process of transposing the directive, and the amendments are planned to come into force in 2023.

On a positive note, Finns still prefer to access online news media directly rather than through intermediaries. This leaves the citizens with more personal control over their news consumption. Most of Finnish newspapers today rely on subscriptions fees, both in print and online, and audiences' brand loyalty is an important resilience factor. Freesheets, tabloid websites and broadcast media are supported by ad sales and are thus more susceptible to market fluctuations. In the ever concentrating news media sector, some companies are actively seeking new revenue streams or expanding their offerings to serve their customers better and to attract new ones.

Hidden advertising in online media has long been recognized as a growing problem also in Finland, especially in the field of influencer marketing on social media. The Finnish Competition and Consumer Authority's (2021) guidelines for influencer marketing address the issue. However, the impact of these guidelines may be limited since the consumer protection authorities hold no direct sanctioning power over the matter. Overall, the mechanisms through which influencer marketing is monitored and regulated are not fully clear nor sufficient.

Conclusive data is largely absent on two crucial aspects: audience and revenue shares of digital native media. The available evidence, although very limited, suggests high concentration on both accounts. Both a

high concentration and lacking data should be considered a significant risk.

Political Independence (27 per cent, Low Risk)

The Political Independence area contains four sub-indicators on digital risks to media pluralism. Legislation on electoral campaigning and political advertisements extends to online media, and all political ads must be clearly marked as such and identify their funders. These rules are generally well respected. The 2021 municipal elections and the regional elections held in early 2022 indicated that rules were followed. With online platforms, Google Transparency Report and Facebook Ad Library are only based on voluntary reports by the platforms and are not monitored by any authority. No comprehensive research exists, but based on a review by the country team, political advertising on the biggest online platforms seems to be adequately labelled as such. All electees duly disclosed the sources and uses of their campaign funding, as required by law (National Audit Office, 2021). However, the law only asks for a superficial level of transparency: for example, various forms of online campaign spending can be filed simply as spending on "information networks" (per Act on a Candidate's Election Funding 273/2009, section 6). No platform-specific spending information (e.g. spending on Facebook advertisements) is required. The office of the Data Protection Ombudsman has the authority to investigate suspected misuse of personal data, including in electoral campaigning.

The Public Service Broadcaster Yleisradio has sufficient funding and mandate to provide digital services to Finnish citizens. Privately owned media have for long criticized Yleisradio's online services for undercutting the market viability of commercial media. There is a mechanism through which Yleisradio's funding and functioning could be limited if it was deemed a threat to private online media, but it has practically gone unused. However, the Act on Yleisradio is currently undergoing changes, aimed at effectively delimiting Yleisradio's online services (Ministry of Transport and Communications, 2020). Amendments to the Act have been approved by the Finnish parliament and will come into effect in August 2022 (Ministry of Transport and Communications, 2022).

Lacking data is also an issue in determining whether digital media is politically independent: without market data it is impossible to indicate whether "major" digital native news outlets are politically controlled. However, most popular Finnish news websites are affiliated with legacy media, and the (possible) politicization of smaller digital native outlets is likely a marginal issue. Finnish newsrooms have a varied approach to social media guidelines. Some have formal codes of social media conduct, others have few lines of general guidelines, while others expect journalists to exercise their own judgement. However, major newsrooms seem to be taking steps toward creating official social media guidelines, per interviews carried out by the country team.

Social Inclusiveness (21 per cent, Low Risk)

The Social Inclusiveness area has two sub-indicators that measure digital risks. One produces positive, one negative results: the majority of Finns (76 per cent) have at least basic digital literacy skills. Thus, relatively few Finns are left with low or no digital literacy skills. At the same time, disinformation is a growing concern and has some, yet limited, effects in Finland. Measures against disinformation rely mainly on governmental actors, while fully independent non-governmental and civil society initiatives are scarce. In journalism, countering disinformation is broadly based on self-regulation. When it comes to hate speech, current laws and policies have not been effective in reducing it[1]. Training police officers and increasing police presence on social media have been used to try to alleviate the problem. There is some concern over potential

encroachment on freedom of expression, as the police's new best practices manual (Hämäläinen, 2021) advises to actively dissuade some expressive acts that are currently legal (i.e. hate speech is not criminalized, although incitement against a social group is). However, authorities may only intervene within their pre-existing legal remit, which means hate speech can be discouraged but not punished.

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5. Conclusions

Finland's area-level risk scores throughout the MPM instrument fall in and near the medium risk range. The **Market plurality** area reaches the highest risk score, although still remaining within the medium risk range. **Fundamental protection** is the only one remaining within the low risk range. No significant changes were seen in the overall risk levels of both **Political independence** and **Social inclusiveness**, both of which reach the lower half of the medium risk level.

Even though the overall situation in Finland is good, the Media Pluralism Monitor identifies several risks to the Finnish media environment. Many of them stem from the absence or laxity of regulation, yet the practical state of affairs is generally good. As the economy started to recover after the worst stage of the COVID-19 crisis, media viability improved compared to 2020. The economic sustainability of the news media remains nevertheless an underlying issue, that has an effect on several indicators. More precisely, the most relevant risks are those related to news media concentration, the underdevelopment of the field of local and regional media, and the increasing risk at commercial influence.

In the **Fundamental protection** area, Finland's legislation guarantees basic communicative rights in accordance with international treaties. These rights are generally respected, and the judicial system provides adequate recourse in contested cases. However, defamation and blasphemy remain punishable under the Criminal Code, and may be punished relatively harshly.
Recommendations:

- **Defamation and blasphemy should be decriminalized by the parliament. At least the scope of punishment should be reconsidered, especially since the possibility of a two-year prison sentence opens authorities the option to use invasive investigation techniques.**

The **Market plurality** area risk score (close to the threshold for high risk) shows, first and foremost, that the Finnish media is still highly concentrated. There is disagreement whether the concentration is necessary to secure any level of financial stability or whether a more pluralistic media could be achieved by anti-concentration regulation. The role of the public service broadcaster is also in question, with private media sector accusing it of unfair competition.
Recommendations:

- **The competent authorities, namely the Finnish Competition and Consumer Authority and the Finnish Transport and Communications Agency, should conduct a review on media's concentration. If deemed necessary, the parliament should then consider additional support schemes, regulation, or both.**

The **Political independence** area scores a medium risk. Finnish private media are largely in apolitical control. The public service broadcaster Yleisradio is under indirect political control, but politicians' attempts to influence it are rare. However, the risk exists as long as Yleisradio's Administrative Council is politically appointed.
Recommendations:

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- **Introducing restrictions on political control of media is not necessary, although the situation must be monitored. Regulatory intervention may become necessary if the media space becomes dominated by a singular political actor or group.**
- **The parliament should consider changing the appointment procedure of Yleisradio's Administrative Council. As with private media, political influence is not a pressing issue at the moment, but legislation should account for the future possibility of politicians desiring to directly control PSM.**

The **Social inclusiveness** area scores a medium risk. Within the area, the risk varies between low and high. There are several issues to be pointed out for further improvement, despite the formal risk level. First, many minority groups, locales and communities are underserved or neglected by both private and public service media. Second, accessibility services for people with disabilities are still not fully up to date with the users' needs. Third, Finland should better prepare for the threat of coordinated mis- and disinformation campaigns.
Recommendations:

- **The government should consider a long-term support scheme for various niche audience media.**
- **The accessibility regulation should be developed with careful attention to the concerns expressed by the users with disabilities.**
- **Media literacy education should be improved throughout the population, equally in all age groups, and officials' capacity to identify and react to mis- and disinformation attacks needs to be boosted.**

6. Notes

[1] Hate speech, per se, is not criminalized in Finnish legislation. Thus, mitigating its effects mostly rely on service providers' and platforms' voluntary moderation, combined with increasing visible police presence in the online environment.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2022 CT Leader
Marianne	*Mäntyoja*	*Project researcher*	*University of Vaasa*	
Ville	*Manninen*	*Country team leader*	*University of Vaasa*	*X*

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 that make up the MPM2022. Consulting the point of view of recognized experts was aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as being subjective, and, therefore, to ensure the accuracy of the final results of the MPM. However, it is important to highlight that the final country report does not necessarily reflect the individual views of the experts who participated. It only represents the views of the national country team that carried out the data collection and authored the report.

First name	Last name	Position	Institution
Marko	*Ala-Fossi*	*Lecturer, adjunct professor, docent*	*University of Tampere*
Harto	*Pönkä*	*A lay representative*	*Council for Mass Media*
Sirpa	*Kirjonen*	*Head of Marketing and Research*	*News Media Finland*
Katiye	*Vuorela*	*Executive Vice President, Corporate Communications*	*Elisa Oyj*
Salla	*Nazarenko*	*International ombudsman*	*Union of Finnish Journalists*
Minna	*Andersson*	*Head of TV, Audio & Events*	*Sanoma Oyj*

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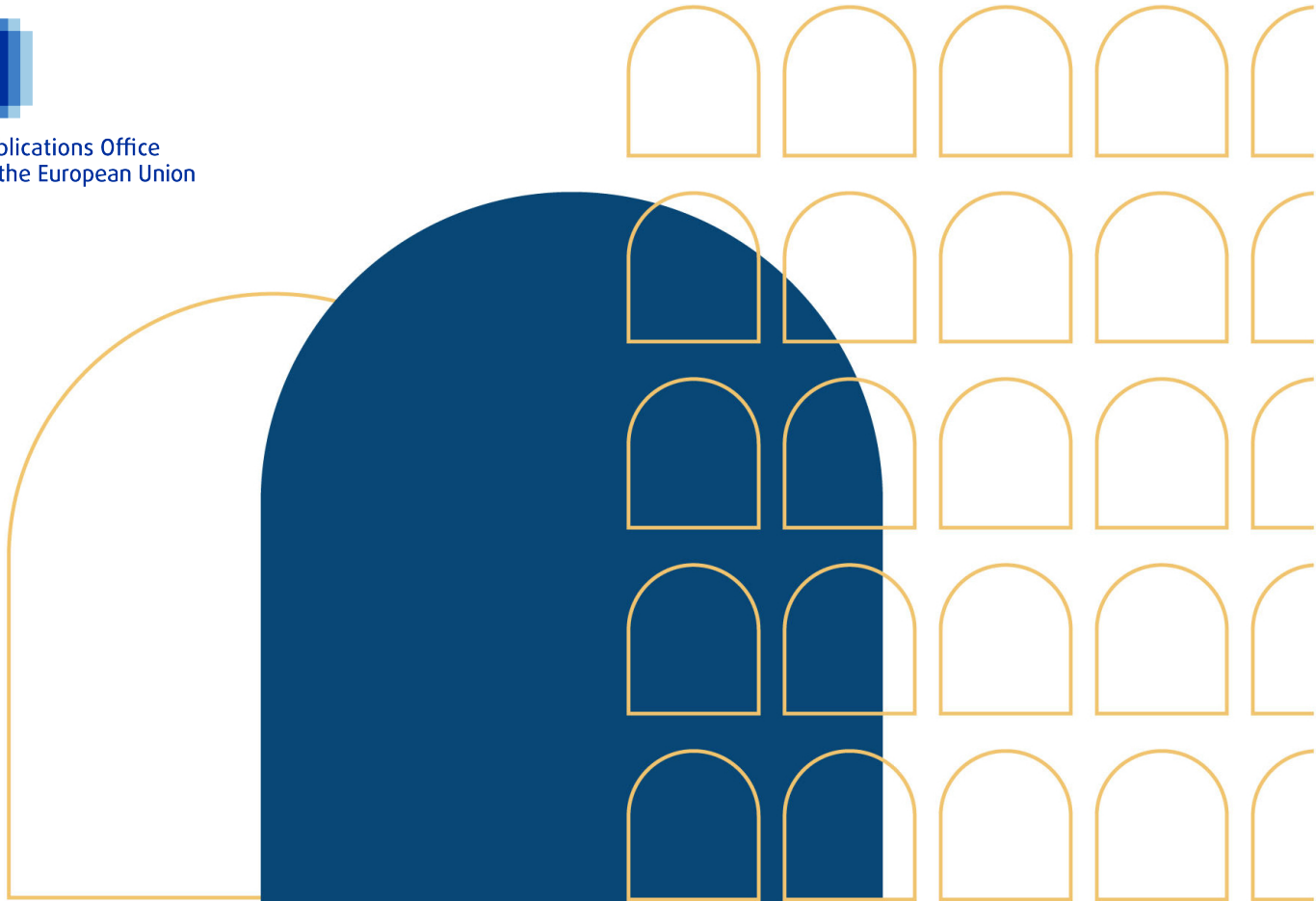
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