

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2022

Country report: Finland

Marianne Mäntyoja, University of Vaasa

Ville Manninen, University of Vaasa

Research Project Report

Issue -

June 2023



TABLE OF CONTENTS

1. About the project	4
1.1. Overview of the Project	4
1.2. Methodological notes	4
2. Introduction	6
3. Results of the data collection: Assessment of the risks to media pluralism	7
3.1. Fundamental Protection (24% - low risk)	10
3.2. Market Plurality (75% - high risk)	12
3.3. Political Independence (32% - low risk)	15
3.4. Social Inclusiveness (41% - medium risk)	18
4. Conclusions	20
5. References	22
Annexe I. Country Team	
Annexe II. Group of Experts	

© European University Institute 2023

Editorial matter and selection © Marianne Mäntyoja, Ville Manninen, 2023

This work is licensed under the Creative Commons Attribution 4.0 (CC-BY 4.0) International license which governs the terms of access and reuse for this work. If cited or quoted, reference should be made to the full name of the author(s), editor(s), the title, the series and number, the year and the publisher.

Views expressed in this publication reflect the opinion of individual authors and not those of the European University Institute.

Published by

European University Institute (EUI)

Via dei Roccettini 9, I-50014

San Domenico di Fiesole (FI)

Italy

ISBN:978-92-9466-439-6

doi:10.2870/893239



With the support of the Erasmus+ Programme of the European Union. The European Commission supports the EUI through the EU budget. This publication reflects the views only of the author(s) and the Commission cannot be held responsible for any use which may be made of the information contained therein.

1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool that is 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 that was carried out in 2022. 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 Annex 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 the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

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 digitally specific risk scores, and the report contains a specific analysis of the risks that 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 the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

Methodological Changes

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the existence of newly available data. For the MPM 2023, no major changes were made to the questionnaire, except for the Indicators Transparency of Media Ownership, Plurality in Digital Markets and Editorial Independence from Commercial and Owners Influence (Market Plurality area), and Protection Against Disinformation and Hate Speech (Social Inclusiveness area). The results obtained for these indicators are therefore not strictly comparable with those results obtained in the previous edition of the MPM. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

In the Market Plurality area, the names of three Indicators have changed. The former indicator on "News Media Concentration" is now named "Plurality of Media Providers"; "Online Platforms and Competition Enforcement" has been renamed as "Plurality in Digital Markets"; "Commercial & Owners' Influence Over Editorial Content" has been renamed as "Editorial Independence from Commercial and Owner Influence".

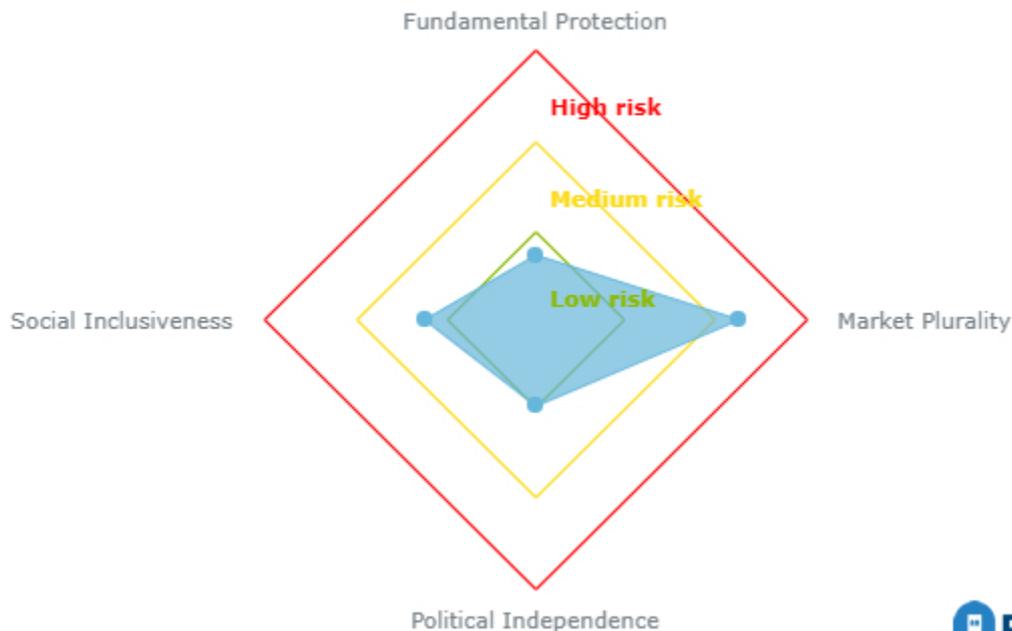
Disclaimer: The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team who carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2023 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 MPM2023, which is 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 2023). With a land area of approximately 304,000 square kilometers, Finland is a relatively sparsely populated country (National Land Survey of Finland 2023).
- **Languages.** Finland has two official languages: Finnish (86.5% of population) and Swedish (5.2%). The language of the native Sámi people is recognized as a minority language, but only 0.04% speak it as their first language. Russian (1.6%) and Estonian (0.9%) are the most common foreign languages. (Official Statistics of Finland 2023)
- **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, i.e. 0.2% (Finnish Institute for Health and Welfare 2023). The self-governing body of the Sámi people recognizes 10,759 members, i.e., 0.2% (Sámediggi 2019). By citizenship, the three biggest minority groups are Estonians (0.9%), Russians (0.5%), and Iraqi (0.3%) (Official Statistics of Finland 2023).
- **Economic situation.** The Ministry of Finance has predicted Finland's GDP to grow by 1.9 percent in 2022. The growth will turn to negative 0.2% in 2023. (Ministry of Finance 2022)
- **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. At the time of writing, Finland's 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. The government base is likely to change over the summer of 2023, as the spring elections resulted in power balance shifts.
- **Media market.** The Finnish media landscape is marked by the presence of a strong public-service media (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 2021 was 3.8 billion euros, with television as the leading sector (at 1.28 billion, PSM included), followed by newspapers (0.87 billion). The value of the mass media market as a whole returned to the pre-Covid level. The publishing industry (incl. newspapers, magazines, books, also electronic publications), however, grew from the previous year but did not reach the pre-pandemic level. (Official Statistics Finland 2022)
- **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" license. 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.

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

Finland: Media Pluralism Risk Areas



JS chart by amCharts



In Finland, 50% (10) of the indicators demonstrate low risk, 30% (6) of the indicators demonstrate medium risk, and 20% (4) of the indicators demonstrate high risk. The most notable change in a negative direction was detected in the Market Plurality area (from 64 to 75% risk) and in a positive direction in the Political Independence area (from 44 to 32% risk). The highest risks are reported in the **Market Plurality** area (75%) due to a high degree of media ownership concentration and a lack of specific thresholds in media legislation to prevent it, and a lack of sector-specific legal provisions imposing financial reporting obligations to media companies. In the area of **Social Inclusiveness**, the indicator for Local/regional and community media scores a high risk at 75% thus staying unchanged compared to the previous year. The issue here is the lack of state support for, or recognition of local and community media.

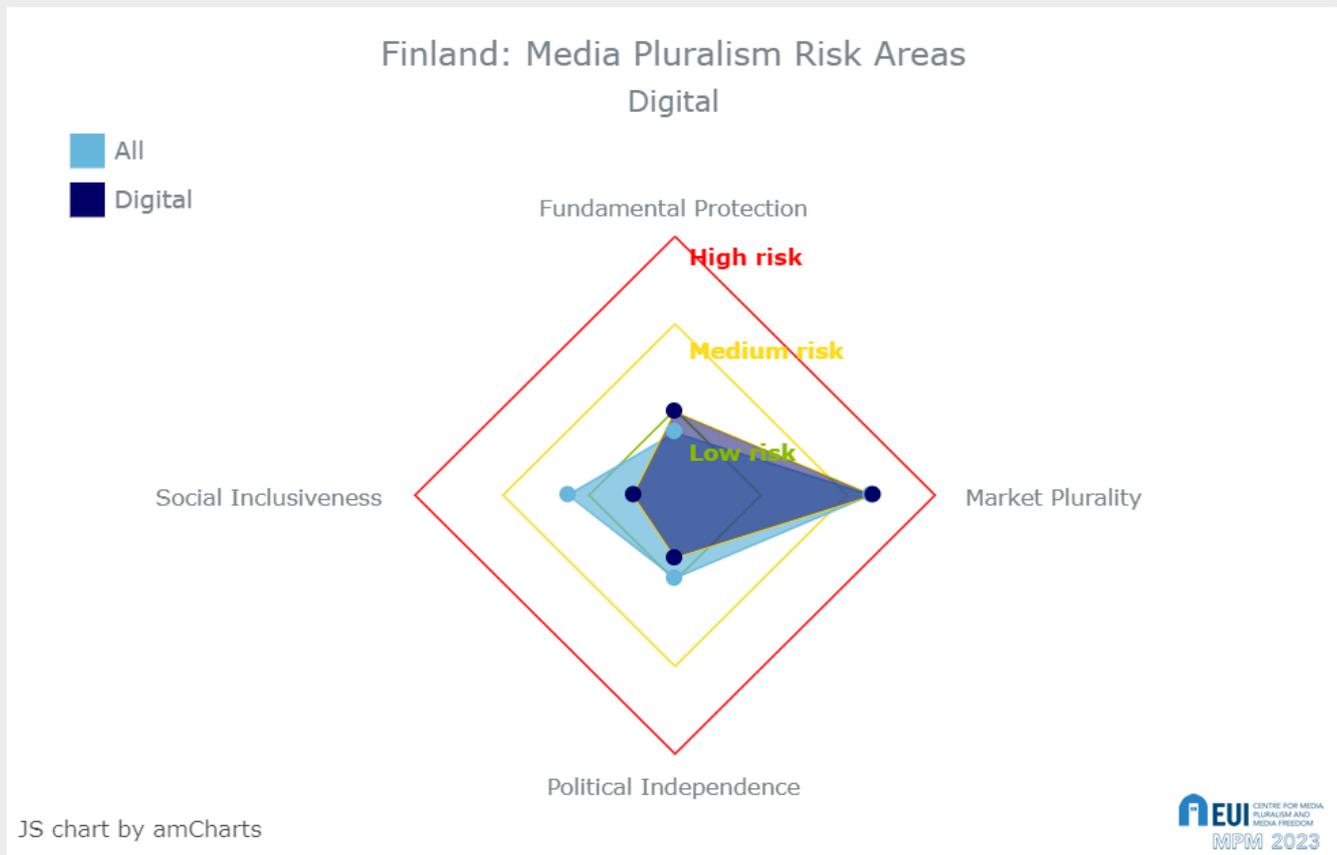
Out of the four areas, the **Fundamental protection** area scores the lowest risk, at 24%. Freedom of expression and right to information are explicitly codified in Finnish legislation with no evidence from 2022 to indicate systematic violations against freedom of expression. The indicator for Universal reach of traditional media and access to the Internet scores the worst, at higher end of the low risk range, with no notable changes compared to the previous year. The main problem in this case is the relatively low availability of broadband internet connections (at least 30 Mb/s), as slightly under 75 % of households have access to such speeds. In the indicator for Protection of freedom of expression, the risk-increasing legal issues remain: blasphemy and defamation are still criminalized.

The **Political Independence** area scores low risk, at 32%. However, a medium risk is detected in the indicators for Editorial autonomy and Political independence of the media mainly due to lack of regulation. Although regulation does not prohibit politicised control of the media, none of the leading media in any sector are under political control. Journalists and editors-in-chief are clearly experiencing attempts at influencing editorial content, but they appear to be largely unsuccessful. The self-regulatory Guidelines for Journalists should be considered, for most parts, an effective countermeasure to political and commercial

pressures.

The **Social Inclusiveness** area scores medium risk, at 41%. An improvement is detected in the indicator for Representation of minorities in the media as Finland imposes high standards in the implementation of the EU Accessibility Directive and the Audiovisual and Media Services Directive. The indicator for Local/regional and community media scores a high risk as the state does not recognise local media, or support it through subsidies or protective regulation. Despite many efforts by the government to curtail hate speech, underreporting of hate crime remains an issue.

Focus on the digital environment



Finland's risk level in the online environment stays somewhat unchanged compared to the previous year.

The **Fundamental Protection – Digital** area scores low risk, at 32%. Regulatory safeguards regarding net neutrality exist. However, within the same subindicator, the four largest ISP's holding a 98% market share increases the risk. Some threats to the online safety of journalists remain, although actual hacking attempts or digital security breaches are rare.

The **Market Plurality – Digital** area scores high risk, at 76%. The area's risk score in the online environment is in line with the overall risk in the area, and Finland's high level of ownership concentration is also evident in the digital markets. In addition, risk increasing factors include lack of data on the digital native media sector and non-existence of sector-specific legislation regarding

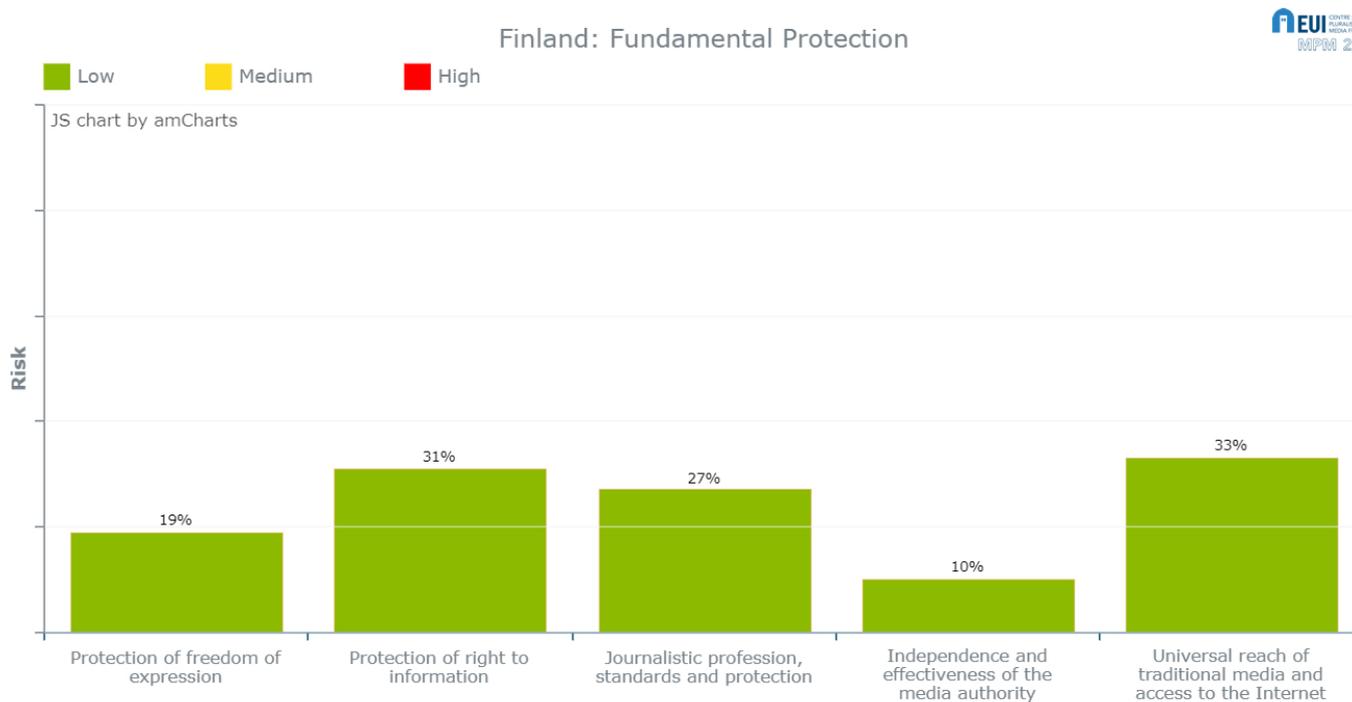
digital native news media.

The **Political Independence – Digital** area scores low risk, at 24%. In relation to the previously mentioned, it is not possible to fully evaluate the presence of political control over the digital native media due to lack of data. The risk level is also elevated by insufficient rules and transparency in reporting political online advertising by political parties and candidates.

The **Social Inclusiveness – Digital** area scores low risk, at 16%. The extant threats relate to shortfalls in the fight against disinformation and insufficient mechanisms to report online hate speech.

3.1. Fundamental Protection (24% - 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.



Finland scores 24% in the **Fundamental Protection** area, which is an improvement of 2 percentage points compared to the previous year.

The indicator for **Protection of freedom of expression** scores a 19% risk and is thus unchanged compared to the previous MPM2022. Generally, Finland is a free and protected environment for journalists and media professionals. Freedom of expression is codified in the Finnish Constitution, and the legal framework is well-developed and in tune with international treaties. Two cases relevant to MPM2023 that relate to press freedom have been reported: trial against three journalists of the leading daily newspaper Helsingin Sanomat for treason, and attacks on press workers during the Convoy Finland 2022 demonstration (Mapping Media Freedom 2022). As there is no evidence of systematic interference with the exercise of these rights (Freedom House 2022; Aarnio et al. 2022), the risk score 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 low risk score (31%). In December 2022, Finland became the twelfth country to approve transposing the EU Directive on whistleblower protection into national law. 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 2022; Honkonen 2021).

The risk score for **Journalistic profession, standards and protection** is within the low risk range (27%). The risk score has improved by three percentage points compared to the previous year due to a change in

how the MPM instrument assesses threats towards women journalists. Generally, physical attacks against journalists are rare. The frequency and gravity of threats and attacks against women journalists specifically do not stand out in studies (e.g. Hiltunen et al. 2022). 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, harassment of journalists for their work is now under public prosecution rather than a matter of civil lawsuit.

The indicator for the **Independence and effectiveness of the media authority** produces a low risk score (10%) and is thus unchanged compared to the previous year. 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. The risk score 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 2022b).

The indicator for **Universal reach of traditional media and access to the Internet** stays just below the medium risk threshold, scoring low risk (33%). The risk score is unchanged from the previous MPM2022. The population is well-covered by public service radio and television broadcasts (Digita 2023a, 2023b), and almost all households have some form of broadband internet subscription (European Commission 2021). The average internet connection speed is relatively fast (in excess of 56 Mb/s), and service providers adhere to the principles of net neutrality (e.g. Aarnio et al. 2022). However, about 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% of the sector (Traficom 2022a, 2022c).

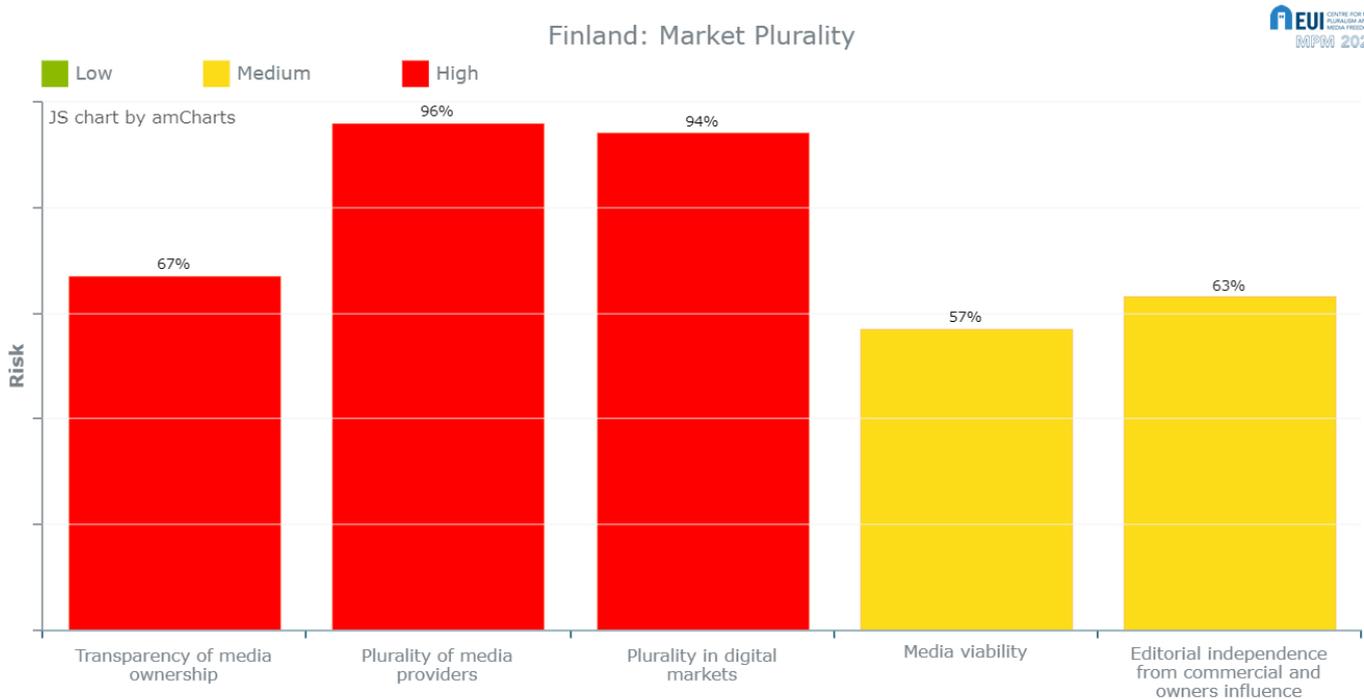
Focus on the digital environment

The **Fundamental Protection - Digital** area acquires a 32% risk score and is thus unchanged compared with the previous MPM2022. Finnish legislation and regulation regarding digital media are up to date with international progress (e.g. with regards to GDPR and Net Neutrality). 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. The Finnish people have access to effective legal remedies to address potential violations of rights.

Currently, the Finnish state refrains from arbitrary filtering or removal of online content. On March 3, 2022, Traficom gave instructions to internet operators on what should be blocked on the internet as part of EU-wide sanctions against broadcasting and provisioning of Russian media. The Finnish Transport and Communications Agency Traficom supervises the open internet regulation, i.e. whether the restrictions imposed are proportionate in light of principles of net neutrality, but it does not have the authority to enforce compliance with the sanctions.

3.2. Market Plurality (75% - high risk)

The Market Plurality area considers the economic dimension of media pluralism, assessing the risks deriving from insufficient transparency in media ownership, the concentration of the market in terms of both production and distribution, the sustainability of media content production, and the influence of commercial interests and ownership on editorial content. The actors included in the assessment are media content providers, with indicators including Transparency of media ownership, Plurality of media providers, Media viability, Editorial independence from commercial and ownership influence, and digital intermediaries (with the indicator on Plurality in digital markets).



The overall risk score for the **Market Plurality** area is 75%, indicating a high risk. Finland's risk score increased by 11 percentage points compared with the previous reporting period. The risk score increased for all other indicators except the indicator for **Editorial independence from commercial and owners influence** which stayed unchanged. Finland scores high risk on three of the five indicators (**Transparency of media ownership**, **Plurality of media providers**, and **Plurality in digital markets**).

The indicator for **Transparency of media ownership** produces a medium risk score (67%). The four percentage point increase in risk compared to the previous year is due to a change in the MPM methodology, which now accounts for Finland's lacking legal provisions for financial reporting obligations in the media sector. Another risk relates to media companies' obligation to report their ownership structure: Under § 4a of the Act on Electronic Communications Services (917/2014), audiovisual media service providers have to communicate their ownership structure, but this legislation only applies to some media. 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).

The indicator for **Plurality of media providers** produces a high (96%) risk score and is increased by 7 percentage points. 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. 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. Currently, all

Finnish media sectors are either highly or intermediately concentrated. The combined market share of the four largest audiovisual media owners increased to 77%. This is a heavy increase of twelve percentage points from last measurement. The change comprises Yleisradio, MTV, and Discovery Networks Finland gaining market share while Nelonen Media's (a subsidiary of Sanoma Oyj) market share remained the same. It should be noted that Yleisradio's market share is calculated using updated data and with a different calculation formula and the result should, therefore, not be compared directly with previous MPM implementations. Still, the data indicates a slight decline of the audiovisual market's total size but share increase within the top companies. The 4% increase of the four largest radio owners' combined market share comprises PSB gaining and private actors losing market shares.

The risk score for indicator **Plurality in digital markets** acquires a high risk assessment (94%). 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. Cross-media ownership concentration in Finland is very high and there is no objective criteria for limiting media market concentration. In theory, the Finnish Competition and Consumer Authority can intervene in monopolistic development in both online and offline environments. In early 2023, the European Commission decided to refer Finland along with five other Member States to the Court of Justice of the European Union for failing to fully transpose the Directive 2019/790 into national law (European Commission 2023). The Commission can call on the Court of Justice of the EU to impose financial sanctions on the Member States that failed to fulfil their obligation to notify measures transposing a legislative directive under Article 260(3) TFEU.

The indicator for **Media viability** produces a (57%) medium risk score and is an increase in risk by 18 percentage points compared to MPM2022. The media industry has, after post-pandemic recovery, returned to its long-term trajectory of slow decline, with only online advertising seeing significant real-value growth. Among traditional media, advertising declined in newspapers (-7%) and TV (-3%) while advertising spending on the radio sector kept advancing (+4%) also in 2022 (Kantar 2023). However, the increase in profits is not enough to create a true increase in profitability due to high inflation rate. Yet, a positive turn in recruitments and rising numbers of editorial staff in the news media is largely driven by the positive trend in online market (Arola 2022). There is currently no direct permanent support mechanism for media (Grönlund et al. 2022) and very few innovative newcomers have surfaced in recent years. News media organisations hold up-to-date knowledge on new technologies such as artificial intelligence and automation but often concern over lacking or dwindling resources inhibits utilizing their full potential (Manninen & Niemi 2022).

The indicator **Editorial independence from commercial and owners influence** reaches a medium (63%) risk score and is thus unchanged compared with the previous MPM2022. 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. Ads that are fully disguised as news are prohibited but 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 (e.g. Hiltunen 2022). Commercial influence is a growing concern for journalists working for small local media outlets highly dependent on advertising, as well as the blurring boundaries of journalism and advertising in major media houses (Hiltunen 2022).

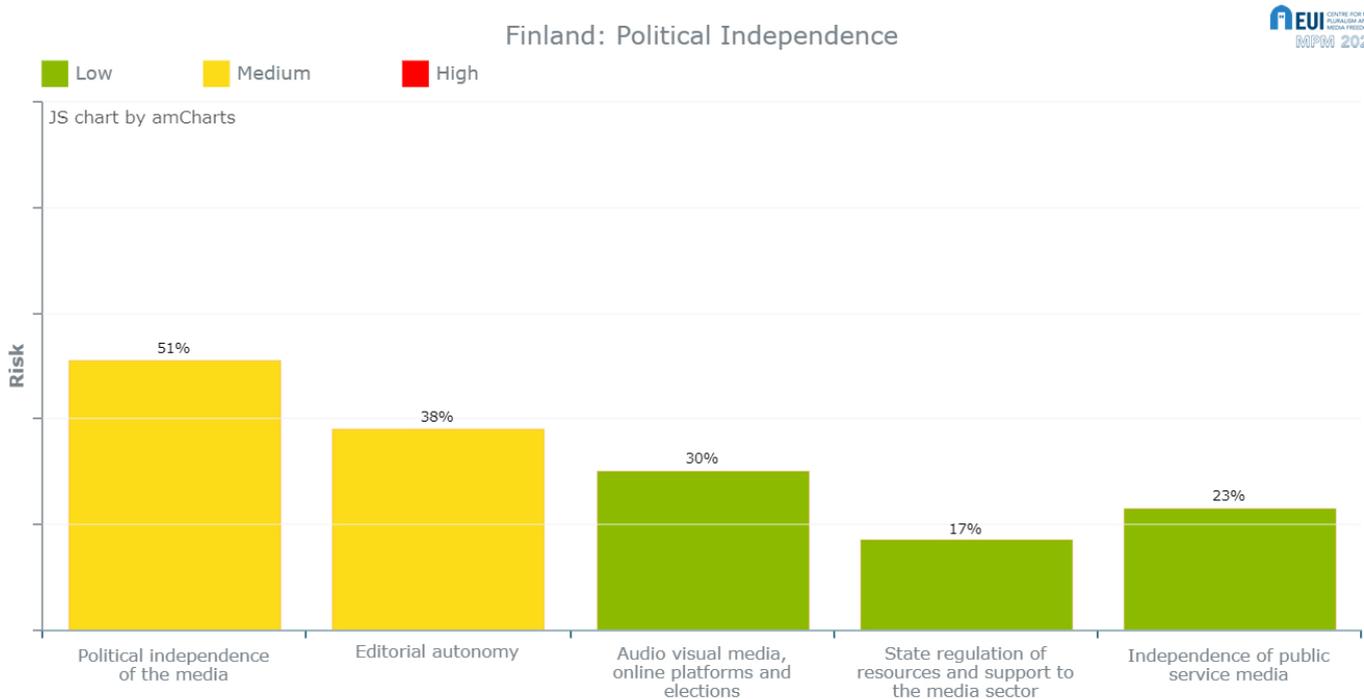
Focus on the digital environment

The **Market Plurality - Digital** has a risk score that is one percentage point higher than that of the overall area - 76%. The 11 percentage point risk increase in the overall Market Plurality area is mainly due to two digital factors: the law does not contain (digital) media-specific provisions imposing financial reporting obligations, and the ownership concentration of the four biggest cross-media companies increased from (already-high) 69% to 78% from MPM2022. Also, the market share of the four biggest players in the online advertising sector increased slightly, to 84%.

Media-specific transparency provisions exist only for audiovisual media, per the Act on Electronic Communications Services (917/2014). The law 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. In addition, 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.

3.3. Political Independence (32% - low 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 32% - low risk. Two indicators (**Political independence of the media** and **Editorial autonomy**) reach medium risk. Three indicators (**Audio visual media**, **State regulation of resources and support to the media sector** and **Independence of public service media**) stay within low risk area.

The indicator **Political independence of the media** reaches a medium risk score (51%) and is thus practically unchanged compared to the previous MPM2022. The risk stems almost entirely from absent regulation: no law prevents politicised control of the media. However, based on the review of stockholder data, none of the leading media in any sector are under political control. The risk score is elevated 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%) for Finland and is thus unchanged compared to the previous MPM2022. No restrictions on the hiring or firing of an editor-in-chief exist in the relevant legislation, although normal restrictions per Employment Contracts Act 55/2001 apply. There are no cases from recent years of political influence in the appointments and dismissals of editors-in-chief. With respect to political interference in editorial decisions, the self-regulatory Guidelines for Journalists are either largely effective or cases of political interference go unnoticed and/or unreported to the Council for Mass Media. Nearly all journalistic organisations in Finland are committed to these guidelines, including the leading news organisations in all sectors. In a survey of editors-in-chief of local newspapers and daily newspapers, 81.5% of respondents reported having experienced attempts at influencing the editorial

content by municipal decisionmakers (News Media Finland 2020). Finland's risk level is calculated with caution in mind and reported attempts at political intervention are taken as a risk-increasing factor. Lack of clear evidence to the contrary, and supporting judgements by the Group of Experts, suggests the current self-regulatory system is sufficient to shield journalism from political influence.

The indicator **Audiovisual media, online platforms and elections** produces a low (30%) risk score. The situation is practically unchanged from the previous year. There is legislation aimed at making political advertising transparent, and there is no evidence that online platforms are acting against their outspoken transparency policies. On the other hand, there is no specific legislation that would ensure political candidates and parties are fully transparent about their campaign spending and techniques online. The risk score is also 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. However, there is no compelling evidence of political bias in either private or public media around elections (e.g. Borg et al. 2020). There are still research gaps and lack of data on commercial media's practices in this field. The Finnish Data Protection Ombudsman provides training to political parties on lawful data practices and investigates complaints, but does not proactively investigate parties' use of personal data in campaigning.

The indicator for **State regulation of resources and support to the media sector** acquires a 17% risk score indicating low risk. The risk score is improved (by 16 percentage points) compared to the previous MPM2022. The only actual change is Finland's updated risk estimate (to low risk) regarding fairness and transparency of state subsidies' distribution. Yet, some minor issues in fairness and transparency remain, as some forms of subsidies are only available to some language groups and, in the case of subsidies available to cultural publications, there is no publicly available information on rejected applications. The framework for regulation of, and possible intervention in media is mostly fair and transparent. As a risk increasing factor, the legislation does not provide criteria on the distribution of state advertising to media outlets and no aggregate data of this form of advertisement spending is collected.

The indicator for **Independence of public service media** reaches a low (23%) risk score. An improvement of 35 percentage points compared to the previous MPM2022 reflects changes in the methodology but also updated views on the actual risk level. Political influence is built in to the system as the PSM corporation Yleisradio's Administrative Council is appointed by the national parliament, traditionally from among MPs (although this is not required by law). 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. Political influence on the appointment procedures cannot be discounted as of yet since the appointments are not fully transparent. Concerns over indirect political control related to politically controlled funding and internal desires to please political parties have been raised while the effects of direct political pressure are seen as very limited (Hiltunen 2022).

Focus on the digital environment

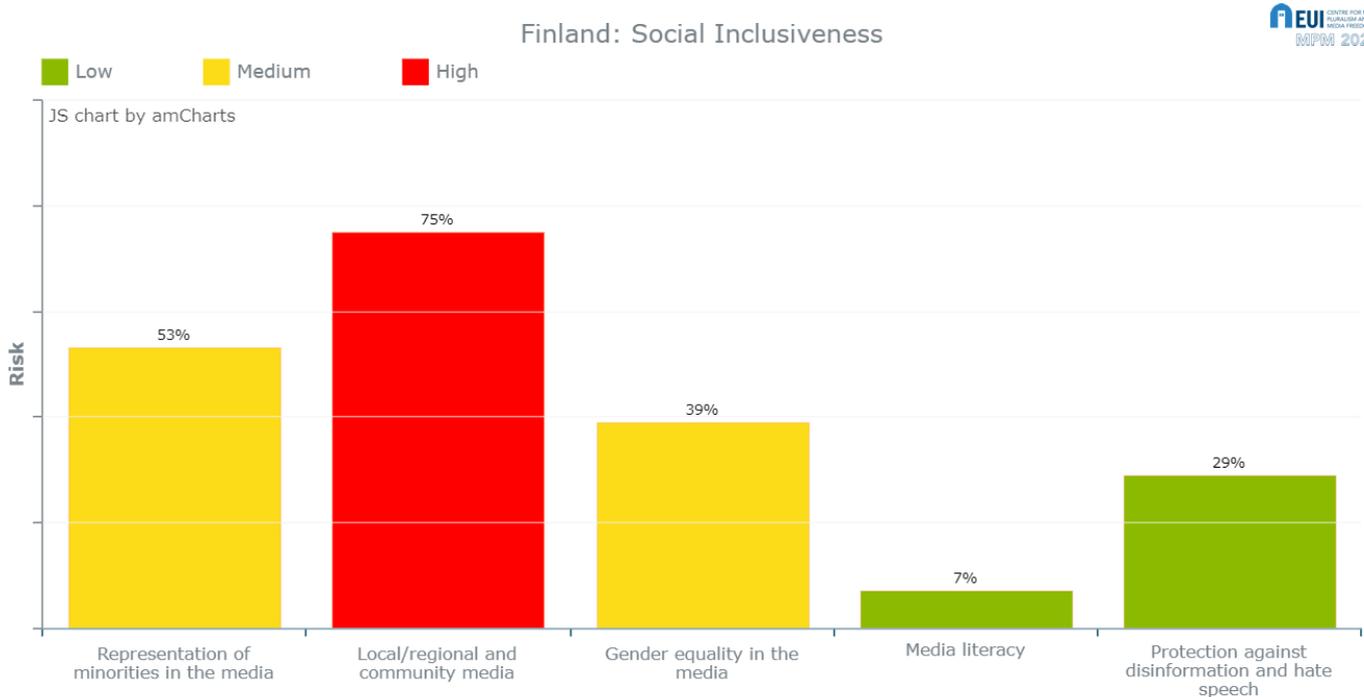
The **Political Independence - Digital** area acquires a 25% risk score and is an improvement of 2 percentage points compared with the previous MPM2022. Act on a Candidate's Electoral Funding (273/2009) applies to all forms of political advertising, including online. However, the law only asks for

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.

While Yleisradio enjoys sufficient and stable funding, the risk is increased by the cumbersome mechanisms for adjusting its funding. Even if Yleisradio was deemed to undermine commercial media, as it has been accused to do, it would take a legislative change to reduce its annual lump-sum funding. Recent amendments to Act on Yleisradio, section 7, require that Yleisradio's text-based online content is more closely linked to its audio or video content broadcasts (Ministry of Transport and Communications 2022). Lacking data is an issue in determining whether digital native media is politically independent: without market data it is impossible to identify leading digital native news outlets and determine whether they are politically controlled.

3.4. Social Inclusiveness (41% - 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 disinformation and hate speech.



Finland scores 41 in the **Social Inclusiveness** area, which is a deterioration of 3 percentage points compared with the previous year.

The indicator for **Representation of minorities in the media** produces a (53%) medium risk score. An improvement of four percentage points on the risk score is due to high standards in the implementation of the EU Accessibility Directive and the Audiovisual and Media Services Directive. Minorities recognized by law are in a fairly good position, while the media does not fully reflect the 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. However, neither public service nor privately owned media serve other minority groups effectively. Overall, unofficial minority-languages other than Russian and English are served only through the PSM website and social media.

Finland scores high risk on the indicator for **Local/regional and community media** (75%) and the risk level is unchanged from the previous reporting period. Local, regional and community media exist in parts of the country, while many communities and locales (depending on the definition) go unserved. Even though not legally obliged, Yleisradio still maintains regional offices in 25 locations, providing sufficient representation of the main language groups. Local, regional or community media enjoy no state-sponsored support schemes or protective regulation. Hence, the field is underdeveloped and mechanisms to support community media have been suggested (Wirén et al. 2021). In a report commissioned by the Ministry of Transport and Communications evaluating the effects of the proposed grant mechanisms, supporting community media is estimated positive as a whole. However, the positive effects would likely be social and cultural, not economic. (Pirainen et al. 2022)

The indicator **Gender equality in the media** reaches a medium (39%) risk score, which is a decrease in risk by 8 percentage points compared to MPM2022. The lowered risk is due to advancements in some leading media positions while the overall picture stays unchanged. 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 in 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). The overrepresentation of male names in Finnish news according to the Gender Equality Tracker (Prognosis 2023) is likely due to the Ukraine war, with male-dominated themes such as security and defense gaining more airtime.

The indicator for **Media literacy** acquires a low (7%) risk score. Media literacy activities in Finland are widespread in both formal and non-formal education and therefore available also for adults and seniors. An increase of risk by 3 percentage points is due to MPM2023 now addressing specifically media literacy activities for vulnerable groups in which Finland's performance could be improved. Finland has a generally strong media literacy policy. The national-level media literacy education guidelines (published in 2019) acknowledge the importance of media literacy in all age groups (see Salomaa & Palsa 2019). Over three quarters of Finns have basic or above-basic digital skills (Eurostat 2023).

Finland scores low risk on the indicator for **Protection against disinformation and hate speech** (29%), the risk decreasing by 9 percentage points compared to MPM2022. In 2019, the European Commission against Racism and Intolerance (ECRI) found that the Finnish authorities do not adequately respond to suspected cases of hate speech and hate-motivated crime (European Commission against Racism and Intolerance 2019). Since then, the Ministry of Justice has launched the Capable Project, which has piloted an Excellence Centre for work against hate crimes. Many improvements have been made since the shortfalls reported by ECRI in 2019, but the follow-up report does not provide a comprehensive analysis of all developments made (see European Commission against Racism and Intolerance 2022). Despite the many efforts, underreporting of hate crime remains an issue (Jauhola et al. 2022). In addition, the inadequacy of funding hinders civil society in the fight against disinformation.

Focus on the digital environment

The **Social Inclusiveness - Digital** area acquires a 16% risk score which is an improvement of 5 percentage points compared with the previous MPM2022. According to Eurostat, the majority of Finns (79%) have at least basic digital literacy skills. In Finland, there is a high level (82%) of trust in the media (Eurobarometer 2021). Awareness of disinformation tactics and sources has grown overall in the society, and no significant changes were detected in its scope and effects. Some minor shortfalls still exist in researching and monitoring disinformation within different minority groups, and in the expertise of law enforcement bodies and the judiciary in identifying hate speech and hate crimes.

4. Conclusions

The **Market Plurality** area reaches the highest risk and is the only area reaching the high risk range. The areas **Fundamental Protection** and **Political Independence** remain within the low risk range. No significant changes were seen in the **Social Inclusiveness** area, which remains at medium risk.

Fundamental Protection is the area with the lowest risk score in Finland. 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, or the scope of punishment should be reconsidered as the possibility of a two-year prison sentence opens authorities options to use invasive investigation techniques.**

In the area of **Market Plurality**, the concentration of Finnish media ownership continues. Its effects on the diversity of media content, equality of information access and freedom of expression is currently under study by a project launched by the government, as recommended earlier by the Media Pluralism Monitor.

Recommendations:

- **The issue of news media concentration should be addressed by the government in due accordance with upcoming research results.**
- **The government should explore media subsidy options based on non-economic criteria, as suggested by a previously completed report.**

In the **Political Independence** area, Finland scores low risk on the indicator for **Independence of public service media**. However, a risk remains therein with regards to both direct and indirect political control due to lack of regulation and transparency.

Recommendations:

- **The transparency of the appointment procedures for the public service media corporation Yleisradio's leading positions should be enhanced.**

In the **Social Inclusiveness** area, Finland scores high risk on the indicator for **Local/regional and community media**.

Recommendations:

- **The government should implement support mechanisms for local, community and minority media based on criteria of inclusiveness, quality, pluralism and information accessibility.**

Fundamental protection – Digital reaches medium risk at 32% and is thus unchanged from the previous MPM2022. The risk level for **Market Plurality – Digital** reaches the highest risk level (75%), having worsened by 12 percentage points compared to the previous year. **Political Independence – Digital** remains within the low risk range (25%). **Social Inclusiveness – Digital** acquires a 16% risk score, which is an improvement of 5 percentage points.

Finland's risk scores online are in line with the overall development in each area, and the regulation of digital media is fairly well up to date with international standards. However, comprehensive market data on the digital native media does not exist, which makes it difficult to assess risks involved with political control and concentration.

5. References

- Aarnio, N. & Heinonen, M. & Hytti, E. & Nieminen, K. & Priiki, M. 2022. Annual net Neutrality Report 2022. Finnish Transport and Communications Agency Traficom.
https://www.traficom.fi/sites/default/files/media/publication/Annual-Net-Neutrality-report_2022_Traficom_0.pdf
- Act on a Candidate's Election Funding 273/2009. <https://finlex.fi/fi/laki/kaannokset/2009/en20090273.pdf>
- Act on Services in Electronic Communications 917/2014. <https://www.finlex.fi/fi/laki/ajantasa/2014/20140917>
- Act on the Finnish Transport and Communications Authority 935/2018.
<https://www.finlex.fi/fi/laki/ajantasa/2018/20180935>
- Act on Yleisradio Oy 1380/1993. <https://finlex.fi/en/laki/kaannokset/1993/en19931380.pdf>
- Arola, J. 2022. Journalistien määrä uutismediassa väheni pitkään, mutta viime vuonna lasku loppui: rekrytointi on kuitenkin vaikeutunut. Suomen Lehdistö. <https://suomenlehdisto.fi/journalistien-maara-uutismediassa-vaheni-pitkaan-mutta-viime-vuonna-lasku-loppui-rekrytointi-on-kuitenkin-vaikeutunut/>
- Borg, S. & Kestilä-Kekkonen, E. & Wass, H. 2020. Poliitiikan ilmastonmuutos: Eduskuntavaalitutkimus 2019. Ministry of Justice. <http://urn.fi/URN:ISBN:978-952-259-838-7>
- Constitution of Finland 731/1999 (n.d.). <https://www.finlex.fi/en/laki/kaannokset/1999/en19990731.pdf>
- Criminal Code of Finland (n.d.). <http://finlex.fi/fi/laki/ajantasa/1889/18890039001>
- Digita. 2023a. AntenniTV:n kartta ja saatavuus. <https://www.digita.fi/verkkojen-saatavuus/antennitvn-kartta-ja-saatavuus/>
- Digita. 2023b. Radion kartta ja kanavat. www.digita.fi/verkkojen-saatavuus/radion-kartta-ja-kanavat/
- Employment Contracts Act 55/2001. <https://www.finlex.fi/en/laki/kaannokset/2001/en20010055.pdf>
- Eurobarometer. 2021. <https://rm.coe.int/ebu-mis-trust-in-media-2021/1680a83792>
- European Commission. 2021. Digital Economy and Society Index. https://digital-agenda-data.eu/datasets/digital_agenda_scoreboard_key_indicators/visualizations
- European Commission. 2023. 11 Member States referred to the Court of Justice of the EU. https://ec.europa.eu/commission/presscorner/detail/en/ip_23_704
- European Commission against Racism and Intolerance. 2019. ECRI report on Finland. Council of Europe. <https://rm.coe.int/fifth-report-on-finland/1680972fa7>
- European Commission against Racism and Intolerance. 2022. ECRI conclusions on the implementation of the recommendations in respect of finland subject to interim follow-up. Council of Europe. <https://rm.coe.int/ecri-conclusions-on-the-implementation-of-the-recommendations-in-respe/1680a59aea>
- Eurostat. 2023. Individuals' level of digital skills. https://ec.europa.eu/eurostat/databrowser/view/ISOC_SK_DSKL_I21/default/table?lang=en&category=isoc.i_soc_sk.isoc_sku
- Finnish Institute for Health and Welfare. 2023. Romanit. <https://thl.fi/fi/web/maahanmuutto-ja-kulttuurin-moninaisuus/kieli-ja-kulttuurivahemmistot/romanit>
- Freedom House. 2022. Freedom in the World 2022: Finland. <https://freedomhouse.org/country/finland/freedom-world/2022>
- Grönlund, M. & Ala-Fossi, M. & Björkroth, F. & Laine, S. 2022. News media outlets and owners: Country report 2022. Euromedia Ownership Monitor. <https://media-ownership.eu/findings/countries/finland/>
- Hiltunen, I. 2022. 'External Interference in Finnish Professional Journalism'. Doctoral dissertation. Tampere University, Faculty of Information Technology and Communication Sciences. Joensuu. <https://urn.fi/URN:ISBN:978-952-03-2486-5>
- Hiltunen, I., Suuronen & Pöyhtäri. 2022. Journalistien painostus ja uhkailu Suomessa: yleisyys ja vaikutukset. Media & viestintä. Vol. 45:2. <https://doi.org/10.23983/mv.120278>
- Honkonen, M. 2021. Media-ala kritisoi rankasti julkisuusperiaatteen toteutumista Suomessa, Journalisti. 16.9.2021. 30 p.

- Jauhola, L. & Siltala, J. & Nieminen, K. 2022. "Että puututtaisiin konkreettisesti" : Seurantaselvitys vihapuheesta ja häirinnästä ja niiden vaikutuksista eri vähemmistöryhmiin. Ministry of Justice. <http://urn.fi/URN:ISBN:978-952-400-482-4>
- Kantar. 2023. Mediamainonnan määrä 2022. <https://www.kantar.com/fi/inspiraatioksi/mediamainonnan-maara/vuosi-2022>
- Manninen, V. & Niemi, M. K. 2022. "Mahdollisuudet ovat kirjaimellisesti rajattomat": Uutismediassa työskentelevien näkemyksiä uusista teknologioista. Media & viestintä. Vol. 45:1. 79–91 pp. <https://doi.org/10.23983/mv.115665>
- Mapping Media Freedom. 2022. Finland. <https://www.mappingmediafreedom.org/country-profiles/finland/>
- Ministry of Finance. 2022. Economic Survey, Winter 2022. <http://urn.fi/URN:ISBN:978-952-367-221-5>
- Ministry of Transport and Communications. 2022. Act on the Finnish Broadcasting Company for approval. Government of Finland. <https://valtioneuvosto.fi/en/-/1410829/act-on-the-finnish-broadcasting-company-for-approval-1685507>
- National Land Survey of Finland. 2023. Suomen pinta-ala kunnittain. https://www.maanmittauslaitos.fi/sites/maanmittauslaitos.fi/files/attachments/2023/02/Vuoden_2023_pinta-atalilasto_kunnat_maakunnat.pdf
- News Media Finland. 2020. Kuka pyrkii vaikuttamaan painostamalla? – Vaikuttamiskysely 2020. <https://www.uutismediat.fi/wp-content/uploads/2020/08/Sanomalehtien-Liitto-vaikuttamiskysely-2020.pdf>
- Official Statistics of Finland. 2022. Mass media statistics. https://pxdata.stat.fi/PXWeb/pxweb/en/StatFin/StatFin_jvie/?tablelist=true
- Official Statistics of Finland. 2023. Population structure. https://pxdata.stat.fi/PXWeb/pxweb/en/StatFin/StatFin_vaerak/?tablelist=true
- Piirainen, K. A. & Uitto, H. & Salminen, V. & Haila, K. 2022. Mediatuen vaikuttavuuden ennakoarviointi : Loppuraportti. Ministry of Transport and Communications. <http://urn.fi/URN:ISBN:978-952-243-885-0>
- Prognosis. 2023. Gender Equality Tracker. <http://www.prognosis.se/GE/Finland/>
- Reunanen, E. & Alanne, N. & Rätty, R. & Nousuniemi, N. & Harakka, T. & Nuorgam, E. & Toivanen, J. & Luoma-Aho, V. 2021. Uutismedia verkossa 2021. Reuters-instituutin Digital News Report – Suomen maaraportti. Tampere University, Faculty of Information Technology and Communication Sciences. <https://urn.fi/URN:ISBN:978-952-03-2023-2>
- Salomaa, S. & Palsa, L. 2019. Media literacy in Finland; National media education policy. Ministry of Education and Culture. <http://urn.fi/URN:ISBN:978-952-263-676-8>
- Sámediggi. 2019. Saamelaiden lukumäärä vuoden 2019 Saamelaiskäräjien vaaleissa. https://dokumentit.solinum.fi/samediggi/download/?d=dokumenttipankki/tilastoja/saamelaiden_lkm_vaaleissa/v%C3%A4est%C3%B6tieteellinen_tilasto_2019_nettiin.pdf
- Traficom. 2022a. Fixed broadband subscriptions. <https://tieto.traficom.fi/en/statistics/fixed-broadband-subscriptions>
- Traficom. 2022b. Liikenne ja viestintäviraston lausunto julkisen talouden suunnitelmasta 2023-2026. <https://www.eduskunta.fi/FI/vaski/JulkaisuMetatieto/Documents/EDK-2022-AK-23026.pdf>
- Traficom. 2022c. Mobile subscriptions. <https://tieto.traficom.fi/en/statistics/mobile-subscriptions>
- Wirén, S. & Aho, H. & Ala-Fossi, M. & Grönlund, M. & Holmberg, J. & Korpisaari, P. & Villi, M. & Virta, P.-M. & Asp, E. & Nykänen, E. & Andersson, A. 2021. Ehdotus pysyväksi avustusmekanismiksi journalismin tukemiseksi. Ministry of Transport and Communications. <http://urn.fi/URN:ISBN:978-952-243-611-5>

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2023 CT Leader
<i>Marianne</i>	<i>Mäntyoja</i>	<i>Project researcher</i>	<i>University of Vaasa</i>	
<i>Ville</i>	<i>Manninen</i>	<i>Country team leader</i>	<i>University of Vaasa</i>	X

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

First name	Last name	Position	Institution
<i>Marko</i>	<i>Ala-Fossi</i>	<i>Lecturer, adjunct professor, docent</i>	<i>University of Tampere</i>
<i>Salla</i>	<i>Nazarenko</i>	<i>International ombudsman</i>	<i>The Union of Journalists in Finland</i>
<i>Minna</i>	<i>Andersson</i>	<i>Head of TV, Audio & Events</i>	<i>Sanoma Oyj</i>
<i>Aino</i>	<i>Sipari</i>	<i>Director of Unit, Consumer Services Unit</i>	<i>Ministry of Transport and Communications</i>
<i>Jukka</i>	<i>Holmberg</i>	<i>CEO</i>	<i>News Media Finland</i>

Research Project Report

Issue -

June 2023

doi:10.2870/893239

ISBN:978-92-9466-439-6

QM-05-23-226-EN-N



Publications Office
of the European Union

