

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 2020

Country report: Finland

Ville Manninen, University of Vaasa
Cecilia Hjerpe, University of Vaasa

Research Project Report

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European University Institute
Badia Fiesolana
I – 50014 San Domenico di Fiesole (FI)
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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 2020. 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 note

Authorship and review

The CMPF partners with experienced, independent national researchers to carry out the data collection and 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 developed by the CMPF.

In Finland the CMPF partnered with Ville Manninen and Cecilia Hjerppe (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 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

The digital dimension

The Monitor does not consider the digital dimension to be an isolated area but rather as intertwined with traditional media and 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 to 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, 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, MPM2021 scores may not be fully comparable with previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2021, soon available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

- Population-wise, Finland is a small country with 5 533 793 inhabitants (Official Statistics of Finland, 2021). With a land area of approximately 304 000 square kilometers, Finland is a relatively sparsely populated country (National Land Survey of Finland, 2021).
- Finland has two official languages: Finnish (86.9 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 (1.5 per cent) and Estonian (0.9 per cent) are the most common foreign languages. (Official Statistics of Finland, 2021)
- Finland does not gather ethnic census data, and the presence of most minorities can only be estimated through registered first languages. Three minorities are recognized by law: the Swedish-speaking Finns, the Sámi and the Romany. The Romany are estimated to number 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).
- Finland's economy was in modest rise when the COVID-19 pandemic struck. Now, the Ministry of Finance predicts a negative 3.3 per cent GDP change for 2020 and a rebound of 2.5 per cent in 2021 (Ministry of Finance, 2021).
- Finland's political landscape has tended to be fairly stable. Two new parties have risen to prominence post-2000: the liberal Greens and the populist 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.
- The Finnish media landscape is marked by the presence of a strong PSM corporation, Yleisradio, and a robust (yet declining) newspaper sector. Yleisradio is Finland's dominant TV and radio broadcaster. The total value of the Finnish mass media market in 2019 was 3.87 billion euros, with television as the leading sector (at 1.28 billion, PSM included), followed by newspapers (0.92 billion). Finns' media consumption is rapidly moving online. The internet has since 2014 been Finns' most used medium, and in 2019 half of the average Finn's media consumption took place online (Official Statistics of Finland, 2020).
- 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.
- The COVID-19 pandemic has caused loss of life and a decline in financial opportunity, but on a global scale Finland seems to have suffered less than many other countries. The pandemic's economic impact is nonetheless reflected in the Finnish media, and the government has allocated funds to cover some of the media companies' losses.

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

Finland's area-level risk scores throughout the MPM instrument fall in and near the medium risk range. The **Market plurality** area reaches a high risk score, whereas **Fundamental protection** remains within the low risk range.

Lack of explicit regulation is the most important overarching risk factor. Basic rights such as freedom of expression and right to information are explicitly codified in Finnish legislation, but generally Finland has chosen a policy of non-intervention. Matters like media ownership concentration, political neutrality and local and minority media are practically unregulated. The limited regulation that exists beyond basic rights (e.g. broadcast licencing) can be considered fair and transparent.

Finland's light-touch approach has mostly led to desirable outcomes. For examples: Major media outlets are not under political control, even though no law prevents it; and no law prohibits commercial or political influence over editorial decisions, but journalists shun them through self-regulation.

Still, weak policy has also led to potentially dangerous development. Media ownership is concentrating into ever fewer hands; online harassment of journalists is a growing concern; and many media companies are struggling to stay sustainable. All of these factors were already at play before COVID-19, and the pandemic has further exacerbated media's revenue stream problem.

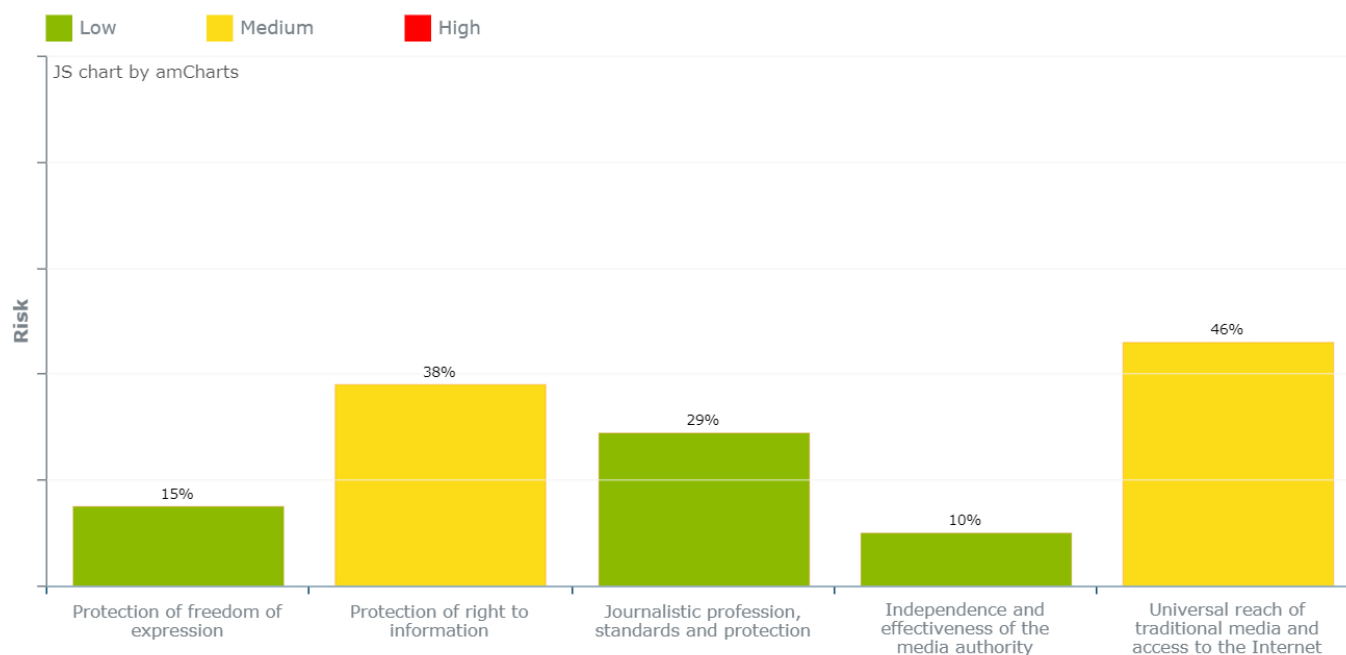
Over half of Finns' time spent with any media is used on the Internet (Official Statistics of Finland, 2020). Still, no comprehensive data is collected on online media's audiences, revenues, ownership, employees or political affiliations. Lacking an overview of such an important medium is a major risk factor.

Countering disinformation has become a crucial issue in the context of a worldwide pandemic. The spreading of disinformation in Finland in 2020 has been relatively modest, which derives mostly from strong self-regulation of journalism and Finns' continued trust in traditional media sources (Newman et al, 2021).

3.1. Fundamental Protection (28% - 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 competence to regulate the media sector, and the reach of traditional media and access to the Internet.

Finland: Fundamental Protection



Finland's overall risk score for the Fundamental Protection area is 28 per cent, well within the low-risk range. However, indicator-specific risk scores vary between low and medium risk.

Generally, Finland is a free and protected environment for journalists and media professionals. Freedom of expression is codified in the constitution^[1] and the legal framework^[2] is well-developed, and in tune with international treaties. There is no evidence of unlawful interference with the exercise of these rights (Mapping Media Freedom, 2020; Reporters Without Borders, 2020; Freedom House, 2020; Aarnio et al, 2020). Strategic litigation is deterred by law: the losing side of a court case covers the legal expenses of the winning side. However, if a plaintiff brings to court a frivolous case, they may be ordered to cover the defendant's legal expenses even if they technically win the case^[3]. The risk score for the indicator Protection of freedom of expression (15 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^[4], access to documents and information held by officials is sometimes denied due to misinformed or willfully unlawful practice (e.g. Hiltunen, 2019; Koski and Kuutti, 2016). As a separate issue, no overarching legislation for whistleblower protection is in place.

The risk score for Journalistic profession, standards and protection is within the low-risk range (29 per cent). The legislative framework provides Finnish journalists with relative security, and the state generally refrains from interfering with journalism. However, the profession has become more precarious in recent years, as media companies' financial security has deteriorated. The state has attempted to soften the blow by, for example, temporarily extending unemployment benefits to freelancers, who COVID-19 has left with fewer or without commissions. Meanwhile, online harassment of journalists is a growing concern, which neither journalists' organisations nor the state has been able to fully address.

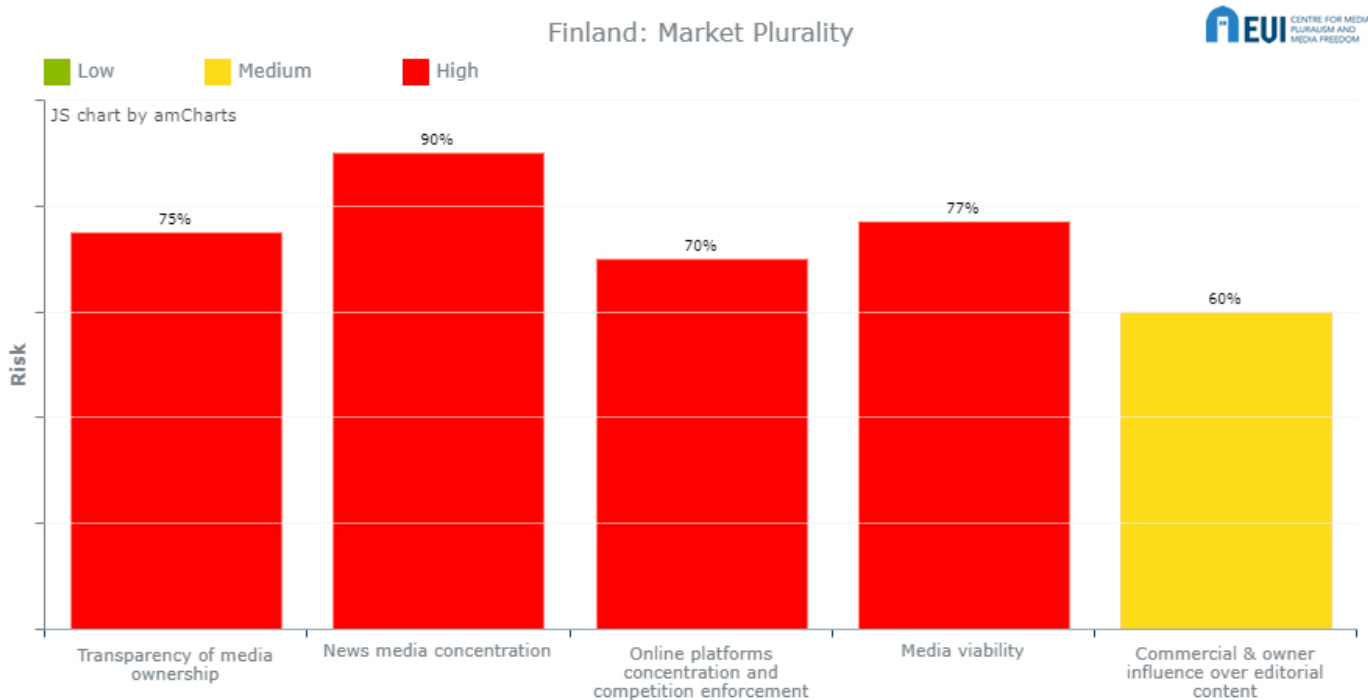
The competent media authority, the Finnish Transport and Communications Agency, has only limited remit to regulate media. There is no evidence of malpractice in the exercise of these powers: Finnish media regulation is fair and transparent. Risk score for the indicator Independence and effectiveness 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, 2020a).

The indicator Universal reach of traditional media and access to the Internet acquires a medium risk score (46 per cent). The population is well-covered by public service radio and television broadcasts (Digita,

2021a, 2021b; Traficom, 2020b), 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 40 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 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, 2020c, 2020d; Ficom, 2021).

3.2. Market Plurality (74% - high risk)

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



The overall risk score for the Market Plurality area is 74 per cent, indicating a high risk.

The indicator **Transparency of media ownership** produces a high risk score (75 per cent). The risk is mostly elevated by the lack of media-specific ownership transparency laws, although general transparency legislation exists. However, it is 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).

At the end of the reporting period of the MPM2021, Finland adopted legislation in line with Article 5(2) of the revised Audiovisual Media Services Directive (AVMSD). Under 4 a § of the “Sähköisen viestinnän palveluista annettu laki” 917/2014, audiovisual media service providers now have to communicate their

ownership structure. The amendment was passed in December 2020 and came into effect on January 1st, 2021. Therefore it had no impact on the 2020 assessment. Regarding an outlook for the year 2021: the amendment would slightly lower Finland's risk score, as the amended law imposes some transparency requirements on audiovisual 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). However, one might still contest the level of transparency provided by the amendment: the law calls for the publication of 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.

News media concentration in Finland is very high, and this indicator produces a high (90 per cent) risk score. 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. Currently, all Finnish media sectors are either highly or intermediately concentrated. Cross-media ownership is also concentrated, although not as severely as individual sectors. Comprehensive data on online news media concentration is not available, but the most popular websites aimed at a Finnish audience 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 (70 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, the Act on Yleisradio is currently undergoing changes, aimed at effectively delimiting Yleisradio's online services (Ministry of Transport and Communications, 2020).

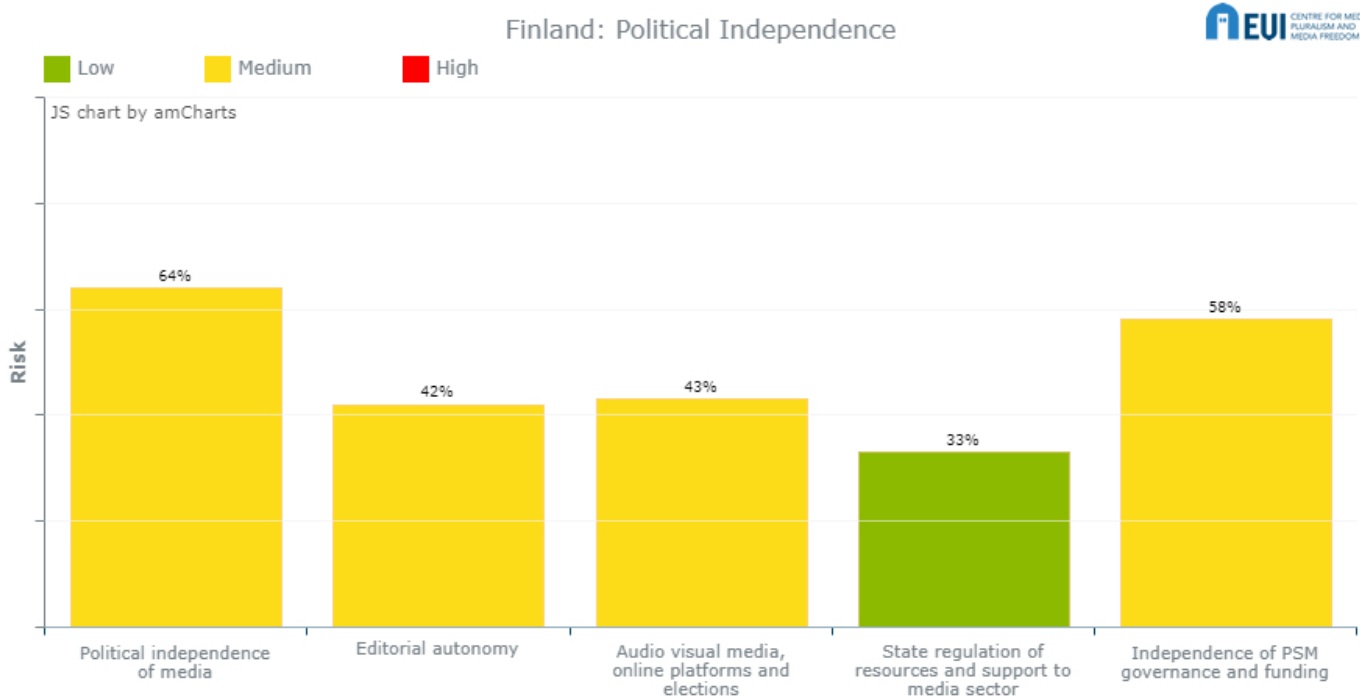
The indicator **Media viability** produces a (77 per cent) high risk score. Revenues of all media sectors decreased from 2019 to 2020. Advertisement spending in traditional media had already been in decline before the COVID-19 pandemic, with increase in online advertising unable to offset the losses. Print media has suffered the most: over last 10 years, print's share of advertising revenue fell from over 50 to less than 25 per cent (Official Statistics of Finland, 2020). The pandemic caused an even heavier dip in ad revenue most sectors (from -9 to -65 per cent change in 2020 compared to 2019); only online advertising increased by 2 per cent (Kantar, 2021). The absence of data regarding digital native and local media sectors is an issue: it is impossible to follow the development (or regression) of these sectors. On a positive note, media companies are actively seeking new revenue streams, and new media startups are being launched. Yet, the number of journalists employed by the press is decreasing annually (Grundström, 2020). Loss of advertising revenues, accelerated by the pandemic, has led to furloughs in the media industry (Liski, 2020) and negatively affected freelance journalists (Heijari, 2020). Finland has provided some support to its struggling media industry, both before and during the COVID-19 pandemic. However, the state support has been meagre aside from a few temporary schemes.

The indicator **Commercial & owner influence over editorial content** reaches a medium (60 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. Thankfully, the self-regulatory Guidelines for Journalists oblige journalists to dismiss non-editorial influence, and journalists largely respect this duty – even though advertisers and politicians sometimes attempt to pressure them (e.g. Hiltunen, 2019; Honkonen, 2017).

3.3. Political Independence (48% - 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 public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and availability of plural political information and viewpoints, in particular during electoral periods.



Finland's overall risk score for the Political Independence area is 48 per cent – medium risk.

The indicator **Political independence of media** reaches a medium risk score (64 per cent). The risk stems almost entirely from absent regulation: no law prevents politicised control of the media. However, none of the leading media in any sector are under political control. The risk score is 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 (42 per cent) for Finland. Journalists' self-regulatory guidelines assert the sanctity of editorial autonomy, and journalists are stalwart in maintaining it. Still, attempts at infringing this autonomy are not unheard of, although they appear rare (e.g. Hiltunen, 2019). This study's national Group of Experts was not unanimous in their assessment of the risk these attempts at political influence may pose. The aforementioned risk score is calculated with caution in mind

and treating any attempts at political intervention as a risk-increasing factor. The majority of the Group of Experts members accepted this approach.

The indicator **Audio visual media, online platforms and elections** produces a medium (43 per cent) risk score. The risk increased by 10 per cent points from 2020 due to the introduction of a new measure in this indicator, and not an actual change in Finland's situation. On the positive side, there is no compelling evidence of political bias in neither private nor public media around elections (e.g., Borg, Kestilä-Kekkonen & Wass, 2020). There is also legislation aimed at making political advertising transparent. 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; this is also increasing the risk.

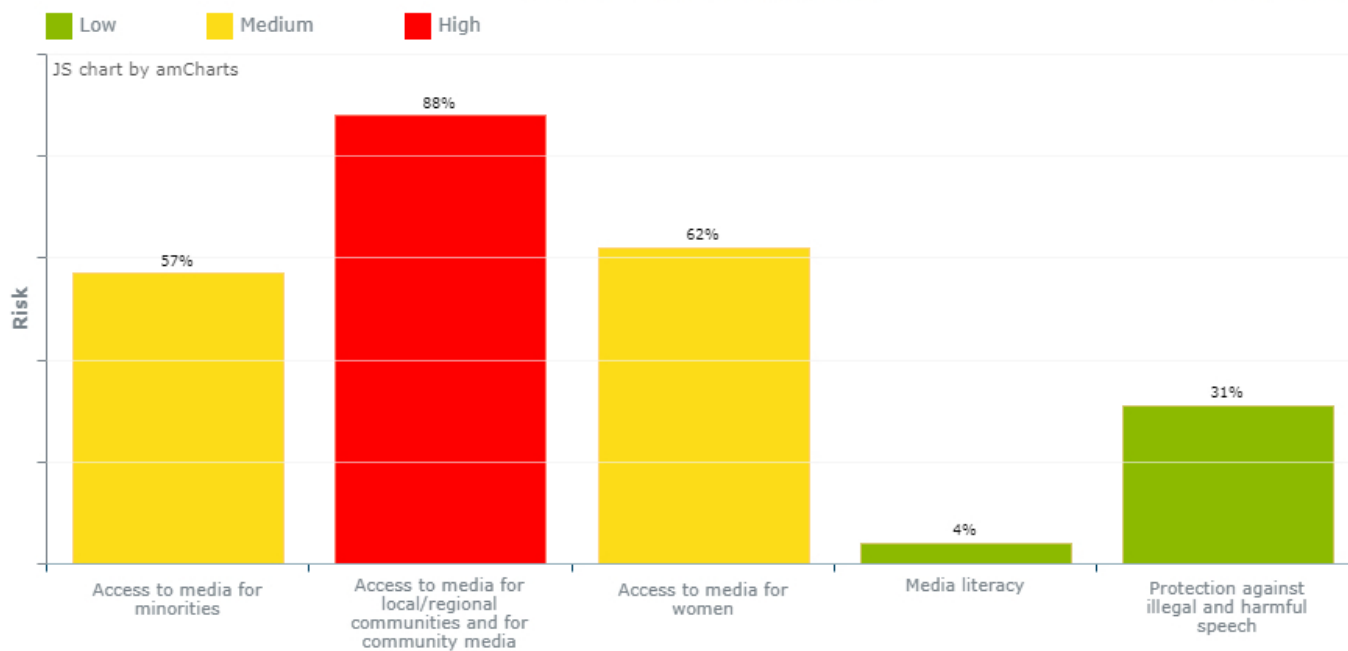
State regulation of resources and support to media sector acquires a 33 per cent risk score, which falls between the low and medium risk ranges. The framework for regulation of, and possible intervention in media is mostly fair and transparent. Regulation-wise, the lack of oversight of allocating state advertising is a risk factor - no aggregate data of this advertisement spending is collected. Furthermore, the criteria for distributing state media subsidies (however measly) could be seen as exclusionary, for example against certain languages. In response to the COVID-19 pandemic, the Government has allotted 7.5 million euros to be granted out to journalism-producing companies, based on universal economic criteria (Ministry of Transport and Communications, 2020b).

The indicator **Independence of PSM governance and funding** reaches a medium (58 per cent) risk score. The risk comprises two elements. Positively, the PSM corporation Yleisradio enjoys sufficient and stable funding. The risk score is elevated by the appointment procedures of Yleisradio's top leadership: its Administrative Council is appointed by the 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.

3.4. Social Inclusiveness (48% - 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. In addition, for the 2021 edition of the MPM, a new indicator has been added to the Social Inclusiveness area in order to assess new challenges raising from the uses of digital technologies: Protection against illegal and harmful speech. Due to this modification of the indicators, comparison with previous editions of the MPM should be handled with extreme care.

[5]



Finland's overall risk score for the Social Inclusiveness area is 48 per cent, i.e. medium risk. However, indicator-specific risk scores range from low to high risk.

The indicator **Access to media for minorities** produces a (57 per cent) medium risk score. A sharp division exists between categories of minorities. National minorities recognized by law, the Swedish speaking Finns and the native Sámi, are in a fairly good position compared to, for example Russian speakers. 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^[6]). Neither public service nor private media serve other minority groups effectively. The Finnish legislation aimed at providing access to media for people with various disabilities^[7], 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 were made at the end of 2020 (Amendment to the Act on services in electronic communications 1207/2020), improving the availability of subtitles and text-to-speech services in on-demand video services (Act on services in electronic communications 917/2014, Section 211). These services had previously been exempt from legally binding accessibility requirements. This indicates a positive development in accessibility issues being taken into account on the policy-level. The COVID-19 pandemic has had both positive and negative effects on media access for minorities. Overall, the communication on COVID-19 has been multilingual. On the other hand, the pandemic might have had a negative effect on how minorities are represented.

Access to media for local/regional communities and for community media in Finland is in high risk, reaching an 88 per cent risk score. Local, regional or community media enjoy no state-sponsored support schemes or protective regulation. These types of media exist in parts of the country, while many communities and locales (depending on the definition) go unserved. Many existing media organisations were struggling to survive even before the COVID-19 pandemic.

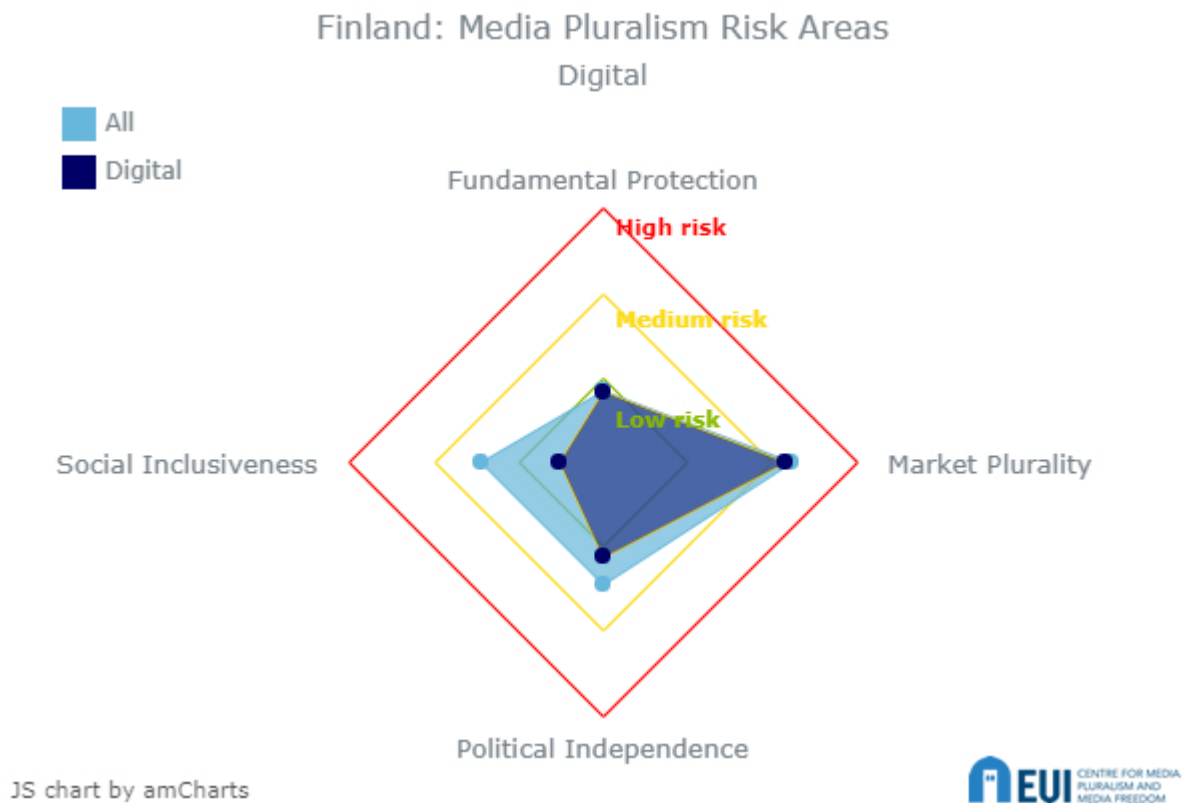
The indicator **Access to media for women** reaches a medium (62 per cent) risk score. Women continue to be underrepresented in most media companies' management, as well as expert interviewees on the news. The public service broadcaster Yleisradio sets a positive example: it maintains a comprehensive gender equality policy, and its management boards have equal gender distributions. Timely research on

gender representation on media is scarce. However, automated monitoring of select online news media indicates that male names are mentioned more often than female names. For example, 64 per cent share of male names was measured on December 1, 2020 (Prognosis, 2020). Gender equality in the news can be considered relatively good in Finland, as reflecting the overall gender gap in society (Djerf-Pierre 2020), but much still remains to be done in terms of stereotyped and gendered representation.

Media literacy acquires a low (4 per cent) risk score. Finland has a generally strong media literacy policy. A distinctive issue is the inconsistently available pedagogical training for media literacy education (Salomaa, Palsa and Malinen, 2017; Hyvönen, Valtola and Valta, 2019). This causes variation between teacher graduates from different universities. Over three-quarters of Finns have basic or above basic digital skills (Eurostat, 2021). 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.

The indicator **Protection against illegal and harmful speech** reaches a barely low (31 per cent) risk score. Countering disinformation is broadly based on self-regulation of journalism. In the context of COVID-19, the government's main method of combating disinformation has been to increase the amount of accurate information and to react immediately to concrete cases of disinformation. Legislation-wise, cases of disinformation or hate speech might not be reached by legislation as they are not legally recognized as such, as opposed to for example defamation or harassment.

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



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 and blasphemy, 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. This intrusive power is mostly intended for countering serious crimes, for example, terrorism, child abuse, or data hacking. Specifically, police can acquire the traffic data if the suspected crime took place over the Internet and carries a maximum penalty of two years-prison or more. Coincidentally, aggravated defamation carries a maximum penalty of two years in prison. Recent changes in a slew of data protection, privacy and policing laws have expanded authorities' powers in criminal investigations and pre-emptive operations.

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. Female journalists experience gender-based verbal abuse and threats of sexualized violence (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 within the Finnish state apparatus.

Market Plurality includes 11 digital risk-related sub-indicators. 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 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.

On a positive note, Finns still prefer to access their online news media directly rather than through social media or search engines. 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 during a time of declining advertisement spending. Freesheets, tabloid websites and broadcast media are supported by ad sales and are thus more susceptible to market fluctuations.

Hidden advertising in online media is a growing issue also in Finland, especially due to rapid increase in social media-borne influencer marketing. The available mechanisms are not sufficient to tackle the problem. Encouragingly, there have been attempts to address the issue, for example by formulating guidelines for influencer marketing (Finnish Competition and Consumer Authority, 2019).

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. For media organizations to survive in the changing media landscape, a broader and more collaborative development work is called for (Tikkanen et al, 2019). On the bright side, media companies are actively seeking new revenue streams, and new media startups are being produced.

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. No elections took place in 2020, but the 2019 parliamentary elections indicated that rules were followed. The vast majority of political Facebook ads, stored in the Facebook Ad Library, were correctly labelled as such. All electees duly disclosed the sources and uses of their campaign funding, as required by law. 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". 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 Ombudsman regularly advises political parties on how to campaign in accordance with the law.

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).

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.

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. On the other hand, hate speech against ethnic minorities, people with disabilities, and women is prevalent online. Initiatives to counteract hate speech are many, but as a whole they are piecemeal. When it comes to disinformation, countering it is broadly based on self-regulation of journalism. In the context of COVID-19, the government has fought disinformation by increasing the amount of accurate information and swiftly reacting to concrete cases of disinformation, for example on social media. In one project, influencers were encouraged to, and provided with the means to, share factual information on COVID-19 through their social media channels (Government Communications Department, 2020).

5. Conclusions

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.

Fundamental Protection

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, there are legal issues the Parliament should amend. Namely, lawmakers should decriminalize defamation and blasphemy, and create legislation to protect whistleblowers.

Finnish journalists' employment has become more precarious over the years, and journalists are increasingly the subject of online harassment. We recommend media industry and journalists' organisations provide training for media managers and journalists in dealing with abuse, and that the police and court system allocate sufficient resources in investigating and prosecuting harassment that is harmful to freedom of speech.

Market Plurality

The Finnish media market is highly concentrated, but the situation's implications are contested. We recommend the Finnish Competition and Consumer Authority conducts a survey of relevant media markets to determine whether increasing competition is viable. Legislative action to deter ownership concentration should not be taken until then. We also recommend that the Parliament considers extending the lowered VAT rate, applied to print subscriptions, to also comparable digital products and services.

Political Independence

Finnish media is largely free of political control, and there is no evidence of a political bias in the media. This independence is not mandated by law, but practiced as a matter of editorial discretion. However, the transparency of political parties' and candidates' campaign expenditure should be improved as a course of legislative action.

Social Inclusiveness

People with disabilities, legally recognized minorities, and the Finnish speaking majority are all served by public service media. Commercial media aimed at minorities is largely absent. Most minorities not recognized by law are underserved. We recommend that solutions to this problem are sought jointly by stakeholder organisations and the Ministry of Transport and Communications. This initiative should lead to legislative action, for example establishing more robust support schemes for minority language media.

6. Notes

- [1] The Constitution of Finland 731/1999, <https://www.finlex.fi/en/laki/kaannokset/1999/en19990731.pdf>
- [2] For instance, restrictions to Freedom of Expression are regulated in the Criminal Code 39/1889, https://finlex.fi/fi/laki/kaannokset/1889/en18890039_20150766.pdf.
- [3] The Code of Judicial Procedure 4/1734, <http://www.finlex.fi/en/laki/kaannokset/1734/en17340004.pdf>
- [4] The Act on the Openness of Government Activities 621/1999, https://www.finlex.fi/fi/laki/kaannokset/1999/en19990621_20150907.pdf
- [5] Section 211 of the Act on services in electronic communications (917/2014), formerly known as the Information Society Code, sets subtitling and audio-description requirements for public service television broadcasts and "national broadcasts that serve several audience groups". See: <https://www.finlex.fi/fi/laki/ajantasa/2014/20140917>
- [6] <https://finlex.fi/en/laki/kaannokset/1993/en19931380>
- [7] Section 211 of the Act on services in electronic communications (917/2014), formerly known as the Information Society Code, sets subtitling and audio-description requirements for public service television broadcasts and "national broadcasts that serve several audience groups". See: <https://www.finlex.fi/fi/laki/ajantasa/2014/20140917>

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Annexe I. Country Team

First name	Last name	Position	Institution	MPM2021 CT Leader
<i>Ville</i>	<i>Manninen</i>	<i>Country team leader</i>	<i>University of Vaasa</i>	X
<i>Cecilia</i>	<i>Hjerppe</i>		<i>University of Vaasa</i>	

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 composing the MPM2021. Consulting the point of view of recognized experts aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as 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
<i>Marko</i>	<i>Ala-Fossi</i>	<i>Lecturer, adjunct professor, docent</i>	<i>University of Tampere</i>
<i>Ismo</i>	<i>Siikaluoma</i>	<i>A lay representative and the 3rd vice president of the Council for Mass Media</i>	<i>Council for Mass Media</i>
<i>Ismo</i>	<i>Huhtanen</i>	<i>Director, Legal Affairs</i>	<i>News Media Finland</i>
<i>Leena</i>	<i>Lie</i>	<i>Chief of Communications and Public Relations</i>	<i>Telia Finland Oyj</i>
<i>Emil</i>	<i>Asp</i>	<i>Senior Ministerial Adviser</i>	<i>Ministry of Transport and Communications</i>

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