Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019

Country report: Sweden

Mathias A. Färdigh, University of Gothenburg
This work has been published by the European University Institute, Robert Schuman Centre for Advanced Studies. This text may be downloaded only for personal research purposes. Additional reproduction for other purposes, whether in hard copies or electronically, requires the consent of the authors. If cited or quoted, reference should be made to the full name of the author(s), editor(s), the title, the year and the publisher.

Requests should be addressed to cmpf@eui.eu

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

Centre for Media Pluralism and Media Freedom
Robert Schuman Centre for Advanced Studies

Research Project Report
RSC / Centre for Media Pluralism and Media Freedom
QM-03-20-146-EN-N
Published in July 2020

European University Institute
Badia Fiesolana
I – 50014 San Domenico di Fiesole (Fi)
https://cadmus.eui.eu/

The Centre for Media Pluralism and Media Freedom is co-financed by the European Union. 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.
# TABLE OF CONTENT

1. About the project  5  
   1.1. Overview of the project  5  
   1.2. Methodological note  5  
2. Introduction  7  
3. Results from the data collection: assessment of the risks to media pluralism  8  
   3.1. Basic protection (15% - low risk)  8  
   3.2. Market plurality (59% - medium risk)  10  
   3.3. Political independence (15% - low risk)  11  
   3.4. Social inclusiveness (17% - low risk)  13  
4. Pluralism in the online environment: assessment of the risks  15  
5. Conclusions  18  
6. References  19  

Annexe 1. Country Team  
Annexe 2. Group of Experts
Monitoring Media Pluralism in the Digital Era: Application of the Media Pluralism Monitor in the European Union, Albania and Turkey in the years 2018-2019

Country report: Sweden

Mathias A. Färdigh, University of Gothenburg
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 and Candidate Countries of the European Union, and considering both online and offline news environments. This narrative report has been produced within the framework of the implementation of the MPM carried out in 2019, under a project financed by a preparatory action of the European Parliament. The implementation was conducted in 28 EU Member States, Albania and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological note

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 was carried out centrally by the CMPF team. The research is based on a standardised questionnaire and apposite guidelines that were developed by the CMPF.

In Sweden the CMPF partnered with Mathias A. Färdigh (University of Gothenburg), who conducted the data collection, scored and commented the variables in the questionnaire and interviewed relevant experts. The report was reviewed by CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts).

Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic 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 below).

<table>
<thead>
<tr>
<th>Basic Protection</th>
<th>Market Plurality</th>
<th>Political Independence</th>
<th>Social Inclusiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Protection of freedom of expression</td>
<td>Transparency of media ownership</td>
<td>Political independence of media</td>
<td>Access to media for minorities</td>
</tr>
<tr>
<td>Protection of right to information</td>
<td>News media concentration</td>
<td>Editorial autonomy</td>
<td>Access to media for local/regional communities and for community media</td>
</tr>
<tr>
<td>Journalistic profession, standards and protection</td>
<td>Online platforms concentration and competition enforcement</td>
<td>Audiovisual media, online platforms and elections</td>
<td>Access to media for people with disabilities</td>
</tr>
<tr>
<td>Independence and effectiveness of the media authority</td>
<td>Media viability</td>
<td>State regulation of resources and support to media sector</td>
<td>Access to media for women</td>
</tr>
<tr>
<td>Universal reach of traditional media and access to the Internet</td>
<td>Commercial &amp; owner influence over editorial content</td>
<td>Independence of PSM governance and funding</td>
<td>Media literacy</td>
</tr>
</tbody>
</table>

Table 1: Areas and Indicators of the Media Pluralism Monitor

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 allows for an extraction of a digital-specific risk score and the report contains a specific analysis of risks related to the digital news environment. The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk.
On the level of indicators, scores of 0 were rated 3% and scores of 100 were 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 or the EC, but 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, the MPM2020 scores may not be fully comparable with MPM2017 ones. For more details, see the CMPF report on MPM2020, soon available on: http://cmpf.eui.eu/media-pluralism-monitor/.
2. Introduction

Sweden is the third-largest country in Western Europe and located on the Scandinavian Peninsula in northern Europe. It is bordered by Finland to the east, Norway on the west and north and connected to Denmark in the southwest by the bridge-tunnel across the Öresund Strait. In relation to its area, Sweden is one of the least populated countries in Europe, with a population of 10.3 million people. Since the industrialization in the 1900s many people have moved from the countryside to the cities of Stockholm, Göteborg, and Malmö. Approximately 19% of the population is born in a foreign country and 2 million of the Swedish population are under the age of 18 years old. The official language is Swedish and the vast majority of Swedes also speak English to a very high level. Sweden has five official national minority languages and countless other languages are spoken by the diverse population. After Swedish, the most common are Finnish, Serbo-Croatian, Arabic, Kurdish, Spanish, German and Farsi.

Sweden is a parliamentary democracy and the constitution, dating from 1809, is based on four fundamental laws: the Instrument of Government; the Act of Succession; the Freedom of the Press Act (TF); and the Riksdag Act. The Swedish parliament is unicameral and elected by the Swedish people through proportional representation multi-member party lists for four-year term. The political preferences of the Swedish electorate are a clear traditional left–right dimension. The last Swedish general election in 2018 resulted in a hung parliament, with the left-red-green and centre-right coalitions each holding about 40% of the seats, and the Sweden Democrats holding the remainder. After several intricacies back and forth, Sweden is currently governed by a coalition of the Social Democrats (S) and the Green Party (MP) in a joint agreement with the Centre Party (C) and the Liberal Party (L) from the centre-right coalition, the so-called January Agreement.

The Swedish media landscape has undergone major changes and shifts in terms of regulation and actors and is dominated by public service broadcasters (SVT, SR, UR). The Swedish public service television company (SVT) has the widest range of programming of all TV companies in Sweden while the Bonnier family, the Stenbeck family and Schibsted are the largest private actors. All forms of media are open to private competition.

Sweden has a strong tradition in print media and characterised by a high newspaper penetration. There is a current shift in revenue structure among the Swedish media companies, mainly from financing through advertising to financing through subscriptions and pay walls. This is evident in the Swedish TV market in particular, where the revenues from subscriptions are increasing, while the revenues from advertising have slowed.

The dissemination and use of the media on digital platforms suggest that there is an infrastructure and that the population has access, the know-how and the financial means to use it. Sweden has a well-developed ICT infrastructure, affordable ICT access and high Internet usage.

In January 2019, the funding of the Swedish PSM was changed from a licence funding system into an income-based tax funding system kept outside the state budget, and is one example of a currently and most interesting formative momentum of the Swedish media landscape.
3. Results from the data collection: assessment of the risks to media pluralism

The implementation of the 2020 Media Pluralism Monitor (MPM2020) in Sweden shows a generally low risk for media pluralism in the country: 75% (15) of the indicators demonstrate low risk, 15% (3) of the indicators demonstrate medium risk, and 10% (2) of the indicators demonstrate high risk.

These high and medium risks are recorded in the Market Plurality area due to lack of specific thresholds in media legislation to prevent a high degree of concentration of ownership and the gradually “blurred line” between editorial and advertising content. The first high risk indicator is on news media concentration and the second high risk indicator is about commercial and owner influence over editorial content. The three medium risk indicators measure transparency of media ownership, online platforms concentration and competition enforcement, and media viability.

On a general level, the MPM2020 instrument shows potential warnings predominantly due to risks in the market plurality area. But the overall state of media pluralism in Sweden should be considered good.

3.1. Basic Protection (15% - low risk)

The Basic 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.
Sweden scores low risk (15%) in the Basic Protection area, where all five indicators score between 3% and 22%.

The indicator for Independence and effectiveness of the media authority has the lowest risk score of 3%. Sweden has effective regulatory safeguards for the independence of the Swedish Press and Broadcasting Authority, limiting the risk of political and commercial interests (SFS 2007:515; SFS 2010:1062). The explicit objective of the media authority is to support freedom of expression, diversity, independence and accessibility.

The indicator that measures Protection of freedom of expression scores a 11% risk. The Swedish media system has a long regulatory tradition for media freedom. There are two constitutional acts relevant to free speech for the Swedish media: the Freedom of the Press Act (SFS 1949:105) and the constitutional law on Freedom of Expression (SFS 1991:1469). Together with the constitutional law that regulates individual freedom of expression, these acts constitute the foundation of the Swedish media system. Freedom of expression is explicitly recognised in the Swedish Constitution since 1991 and there are relatively few cases of violations of freedom of expression in Sweden in recent years.

Sweden also scores low risk on the indicator that measures Protection of right to information. The legal provisions to protect the right to information are clearly defined. So are the restrictions on grounds of protection of privacy and confidentiality. Sweden follows the European Convention for the Protection of Human Rights and Fundamental Freedoms (SFS 1994:1219). There are, however, at the same time some indications of poor implementation even though it is not possible to judge whether deliberately or due to ignorance of the officials. In total, Sweden scores a 16% risk for this indicator.

Sweden scores low risk on the indicator for Universal reach of traditional media and access to the Internet (21%). In addition to the Swedish Radio and Television Act (SFS 2010:696) and the constitutional law on Freedom of Expression, the universal coverage of both the PSM and private media is regulated in the broadcasting licences. Together with a well-developed infrastructure and affordable ICT access, this guarantees a universal coverage of traditional media and access to the Internet in Sweden.

Finally, the indicator that addresses the Protection and standards of the journalistic profession demonstrates a score of 22% risk. The general view is that the conditions the Swedish journalists operate in are among the most favourable in the world and there are no laws or self-regulatory instruments that prescribe who may practice journalism in Sweden. The composite risk level for this indicator is also generally low. However, there are some notable blemishes related to journalistic protection. Statistics from the Swedish National Council for Crime Prevention shows that more than 30% of the journalists in Sweden are harassed and threatened each year because of their work as journalists (BRÅ 2015). This is confirmed by the results from the Swedish Journalist Panel at the University of Gothenburg where 30% of the
journalists also answered that they have received threats in the past year and that the most common is threats of physical violence. The proportion of journalists who are exposed to abusive/derogatory comments has decreased from 80% in 2013 to about 70% in 2019. The decrease is largely due to closed comment fields (Löfgren-Nilsson 2019).

3.2. Market Plurality (59% - medium risk)

The Market Plurality indicators examine the existence and effectiveness of provisions on transparency of media ownership and the existence and effectiveness of regulation or self-regulation against commercial & owner influence on editorial content. In addition, they assess the risks related to market concentration in the production as well as in distribution of news: as for production, considering separately horizontal concentration in each sector and cross-media concentration; as for distribution, assessing the role of online platforms as gateways to news, the concentration of online advertising market, and the role of competition enforcement and regulatory safeguards in protecting information pluralism. Moreover, they seek to evaluate the viability of the news media market.

Overall, Sweden scores medium risk (59%) in the Market Plurality area, where the five indicators score between 37% and 97%. Sweden scores high risk on the indicators for news media concentration (97%) and commercial and owner influence over editorial content (68%). Sweden scores low risk on the indicator for Media viability (37%). The Swedish TV industry is undergoing a major transformation. The audience is moving from traditional TV to online, and now also beginning to gain substantial revenue for online-based TV services. This means that a growing part of the revenues for Swedish television come from digital services. As a result of the fundamental and on-going restructuring of the advertising market, the business model of the Swedish newspaper industry has been put under severe pressure. Since 2012, the printed newspaper is no longer the largest advertising platform on the Swedish market – the Internet is. The latest report from Reuters Institute also show that Sweden (together with Norway) has the highest growth when it comes to paying for news online. Swedish news publishers continue to accelerate their efforts to increase reader revenue, experimenting with different approaches to online subscription models. (Reuters Institute, 2019).

The indicator on Online platforms concentration and competition enforcement produces a medium risk score (45%). Most notably for the level of risk for this indicator is the difficulty in obtaining reliable data. On the other hand, there are no specifications on online platforms concentration or cross-media ownership specifically aimed at media companies in Sweden. Instead, concentration online and cross-media ownership is covered by the Swedish Competition...
Act (SFS 2008:579) through two main provisions: (1) Prohibition of anti-competitive cooperation; (2) Prohibition of the abuse of a dominant position. The Swedish Competition Act also contains restrictions on: (1) Anti-competitive sales activities by public entities; (2) Control of concentrations between undertakings. All Swedish companies are treated equally regardless of sector which means that the general provision on competition does not face the digital challenge or addressing this problem fully.

This also relates to the indicator for **Transparency of media ownership** and the medium risk score (50%). Sweden has no specific regulations on transparency for media companies as such. Instead, all companies are included and constrained to follow the general regulations in the Swedish Law of Financial Relations, the so-called Transparency Act (SFS 2005:590) which requiring companies to be transparent about ownership structures and the Competition Act (SFS, 2008:579), which regulates the ownership concentration. This means that all Swedish companies are required to inform the Swedish Competition Authority about their ownership structure and that all Swedes can access the annual reports of the Swedish media companies, which also include information on ownership and are available on their websites.

Sweden scores high risk on the indicator for **Commercial and owner influence over editorial content** (68%). On the one hand, all members of the Swedish Union of Journalists (SJF) follow professional rules. Violation of these rules can be notified within three months of the event at the journalists’ ethics committee. On the other hand, and was pointed out in the MPM2017 implementation, one of the most pressing issues concerns content marketing and where to draw the line between advertorials and editorial material. This is still a challenge for the Swedish media to manage as it creates difficulties for ordinary people to see the difference between advertorials and editorial material.

Finally, Sweden scores the highest risk on the indicator for **News media concentration** (97%). The level of news media concentration in Sweden is regulated in the Radio and Television Act (SFS, 2010:696, chapt. 4, 11§, 15§ and chapt. 13, 27§-28§) and in the broadcasting licenses. Furthermore, the Swedish media sector is regulated on the basis of the general Competition Act. However, the Radio and Television Act contains no clearer criteria than the wording: “ownership may not change more than to a limited extent”. Thus, it is up to each control authority to assess what is really meant by “more than to a limited extent” (also note that this formulation has no constitutional support). There are administrative authorities overseeing compliance with news media concentration and ownership limitations but no clear criteria for them to use.

### 3.3. Political Independence (15% - 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 public service media. Furthermore, the area concerns 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.*
Sweden scores low risk (15%) in the Political Independence area, where all five indicators score between 3% and 25%. The indicator for **Independence of PSM governance and funding** acquires a low risk score (3%). The broadcast licence regulates the operations of the Swedish PSM broadcast media in terms of independence from the state and from different economic interests. Media independence is also regulated by the Swedish Radio and Television Act and the Freedom of Expression Act. The appointment procedures are well defined in law and provide for the independence of the Swedish PSM boards and management. Nevertheless, the procedure allows political oversight. The PSM boards are appointed by the PSM Management Foundation (Författningsstiftelsen), which in turn is appointed by the government on the proposal from the political parties in the Swedish parliament. To avoid the general election to have an immediate impact in the PSM Management Foundation’s composition, there has been agreed that the Chairman and six other members appointed by the government in the year that follows the general election. The chairman appointed for four years, and the members in eight years. Thus, a newly appointed government may replace the chairman, but there is otherwise a delay in the board’s composition. There are no indications or any examples of conflicts concerning appointments or dismissals of managers and board members of the Swedish PSM.

Sweden scores a low risk on the indicator for **State regulation of resources and support to media sector** (8%). The implementation of the so-called ‘telecom package’ in Swedish legislation is a high priority for the Swedish government. The legislation on spectrum allocation is also implemented effectively, but with one objection. According to the EU Commission’s guidelines on the implementation of state support for the deployment of broadband state support can only be granted for the development of wired fiber-based or upgraded cable TV networks. The guidelines exclude, in time state support for the development of the mobile network infrastructure. A country with the kind of topography and demographics of Sweden, there is a need for greater flexibility in technology than what is the case today, to carry out the deployment of high-speed broadband in the most efficient way possible. The direct state subsidies are distributed to media based on fair and transparent rules.

The indicator for **Political independence of media** scores low risk in Sweden (19%). The risk score is related to the lack of regulation, rather than to actual malpractice. On the other hand, there are no current examples of conflicts of interest between media owners and ruling parties, partisan groups or politicians.

Sweden scores a low risk on the indicator for **Audio visual media, online platforms and elections** (21%). The lack of concern for audio visual media in relation to this indicator is confirmed in a number of annual evaluations of Swedish media news content. The Media Election Survey conducted every parliamentary election in Sweden since 1979, shows that both PSM and commercial media generally offer proportional and non-biased representations (Johansson & Strömbäck, 2019). Instead, there are potential risks when it comes to the online platforms. There are still no specific...
regulations fully addressing the need for transparency about campaign spending and techniques used in social media political campaigns.

The indicator for **Editorial autonomy** scores a low risk (25%). The Swedish Freedom of the Press Act (TF) regulates autonomy in appointing and dismissing editors-in-chief. Additionally, a large number of media and journalist organisations (Sveriges Radio AB (SR), Sveriges Television AB (SVT) och Utbildningsradion AB (UR), Publicistklubben (PK), Svenska Journalistförbundet (SJF), Svenska Tidningsutgivareföreningen (TU), Sveriges Tidskrifter) have jointly developed a number of self-regulatory/voluntary codes of conduct for stipulating editorial independence, which the majority of Swedish media are following. There are also no indications of informal political interference in appointments and dismissals of editors-in-chief or of parties or politicians trying to influence the editorial content.

3.4. Social Inclusiveness (17% - low risk)

The **Social Inclusiveness indicators** are concerned with access to media by various groups in society. The indicators assess regulatory and policy safeguards for community media, and for access to media by minorities, local and regional communities, women and people with disabilities. In addition to access to media by specific groups, the media literacy context is important for the state of media pluralism. The Social Inclusiveness area therefore also examines the country’s media literacy environment, as well as the digital skills of the overall population.

On average, Sweden scores low risk (17%) in the Social Inclusiveness area, where the five indicators score between 3% and 33%.

Sweden has a strong tradition in policy-making on Access to media content by people with disabilities. A short excerpt of the Swedish PSM Broadcasting Licence translated to English says: 11§ “SVT shall take into account the needs of persons with disabilities. However, the level of ambition in terms of opportunities for persons with disabilities to benefit from SVT’s range should be increased and the availability improved. The long-term goal is that the entire range is made available to all citizens. The accessibility of programs for children and young people should be given priority. SVT will continue to prioritize their coverage including by the design of the broadcasts mind that background noise may impair the ability of people with hearing loss to take part of the supply. Programs will also be produced for specific audiences. SVT will have a dialogue with the groups concerned.” However, the policy is not explicit about quality: you can for example turn on or turn off the subtitles but you cannot customise further. The indicator for **Access to media for...**
people with disabilities scored low risk in Sweden (3%).

The indicator for Media literacy produces a low risk score in Sweden (11%). The Swedish Government has commissioned the Swedish Media Council to strengthen the work for increased media and information literacy (MIK) by developing collaboration and the authority's activities in this area. The assignment includes creating a network for stakeholders working on issues related to MIK, building a platform for knowledge and information dissemination, further mapping developments in the MIK area and developing the authority's MIK resources. The majority of Swedish people use the Internet on a daily basis and have at least basic digital skills. At the same time, Sweden is struggling with the same challenges as many other countries in the EU, to really reach out with information and knowledge to peripheral groups (e.g. language, culture etc.).

Sweden also scores low risk on the indicator for Access to media for women (17%). The Swedish law on equal rights (SFS 2008:567) is reactive and can especially be used when individuals believe they have been disadvantaged. In addition to protection against discrimination there are also various promotions, such as access to a good education for everyone. In the media sector, there are instead more explicit requirements for example that program content should promote diversity and equality (which is usually interpreted as a balanced representation of women and men). SVT has a comprehensive gender equality policy covering both personnel issues and programming content.

Sweden scores low risk on the indicator for Access to media for local/regional communities and for community media (19%). In Sweden, the independence of community media encompasses both diversity in media content and media providers. PSM also has a specific agreement to offer a diverse range of programmes. These should reflect the diversity of the entire country and characterised by a high level of quality, versatility and relevance and be accessible to all.

Finally, Sweden scores low, but on the border with medium risk on the indicator for Access to media for minorities (33%). The Swedish broadcasters have a major responsibility to take into account the needs of both physically challenged peoples as well as the national linguistic and ethnic minorities. According to the Swedish PSM Broadcasting Licence, the Swedish broadcasters are expected to give minority media access to media platforms and not least to improve accessibility. In Sweden access to airtime on PSM channels for social and cultural groups are guaranteed in practice, but whether the access to airtime is adequate or not varies between social and cultural groups. The Swedish PSM broadcasting licenses contain conditions relating to airtime of the five minority languages: Sami, Finnish, Meänkieli, Romani Chib and Yiddish. The total airtime for Sami, Finnish, Romani and Meänkieli are 11 214 hours in 2018. With an agreement with SR and UR, SVT broadcast news in Finnish and Sámi. SR broadcasts news programs in Romani Chib and Meänkieli (Sveriges Televisions public service-redovisning 2018). In the new charter/license 2020-2025 for the Swedish PSM there is an explicit clause that demands PSM broadcasters to have a specified obligation to provide news to an increased number of minority groups in Sweden.
4. Pluralism in the online environment: assessment of the risks

Sweden scores low risk (19%) in the Basic Protection – Digital area. Freedom of expression online is clearly defined in the Swedish law and in accordance with international and regional human rights standards, and with some supplementary and specific laws for the Internet, and includes violations of rights online and offline by State or non-State actors. The Swedish state is not filtering or removing online content in an arbitrary way. However, would it still be that someone perceives that they have been subjected to any violations of their freedom of expression, both offline and online, the Swedish people have access to effective legal remedies to address such violations. When it comes to ISPs and filtering and removals of online content, this is regulated in the Act of Electronic Communication (SFS 2003: 389) and in the Act of the collection of data on electronic communication in the law enforcement intelligence (SFS 2012: 278), and is reported in a clear and transparent way.

But when it comes to journalism and data protection, the Swedish law establishes data retention obligations which only partially comply with articles 8 and 10 of the European Convention on Human Rights. From October 1, 2019, the obligation for operators to store data for law enforcement purposes was reintroduced in Sweden. For operators using so-called NAT technology for address translation, additional rules will come into force on April 1, 2020. The background is the decision of the European Court of Justice 2016 which stated that the Swedish legislation of that time was not compatible with EU law. Therefore, the Swedish government is now introducing a number of new regulations to fully comply with articles 8 and 10 of the European Convention on Human Rights.

Another example where Swedish regulation fall short in terms of journalism and data protection is the Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016. The directive was transposed into Swedish legislation in a way that just partially prevents the illegal monitoring of journalists by law enforcement authorities in that there are no guarantees that information covered by, for example the journalist’s duty of confidentiality, will not be stored and submitted to the Swedish police.

Finally, when it comes to the GDPR and regulations on net neutrality, GDPR has been implemented since May 25, 2018. In Sweden, it is directly applicable as a law with the explicit provision that the Freedom of the Press Act (SFS 1949: 105) and the Freedom of Expression Law (SFS 1991: 1469) take precedence over the GDPR. This means that constitutionally protected media will be able to use personal data in the same way as before. Moreover, even those who do not have constitutional protection for their journalistic activities can avoid the requirements under the new Data
Protection Act. Examples of such journalistic activities are blogs without publication proof or publications in social media.

A regulation on net neutrality and international roaming was implemented in November 2015 (Regulation (EU) 2015/2120). The regulation contains a number of provisions and aim to ensure that the traffic over the Internet are not discriminated against and that the end-user’s right to an open Internet is preserved.

Overall, Sweden scores medium risk (53%) in the Market Plurality – Digital area. As mentioned previously, the Swedish law does not contain specific provisions requiring the disclosure of ownership details in the Swedish news media sector. Instead, the law on financial relations, also called Transparency Act, applies to all Swedish companies and regardless of media type. contains provisions requiring media companies, just as all other Swedish companies, to be transparent about, for example, ownership structures (SFS, 2005:590). In practical terms, this among other things means that media companies publish annually reports on ownership structures on their websites.

There are two administrative authorities overseeing ownership limitations and hearing complaints. The Swedish Media Authority monitors the media companies specifically and the Swedish Competition Authority monitors all Swedish companies. However, since the legislation does not contain any clearer criteria than the wording: “ownership may not change more than to a limited extent”, this is of course problematic. There are two administrative authorities overseeing compliance with the ownership limitations but there are no clear criteria for them to use.

Another area of the Market Plurality domain is the main way in which the Swedes access news online. In the latest report from the SOM Institute 82 percent of the Swedes stated that they used a digital news service at least once a week (Swedish Trends 1986-2018). This could be interpreted as mainly direct access since people rather mix their use of social media with digital news, not the other way around. The interesting thing is that the SOM Institute also asked about the Swedes use of social media in the same survey. 72 percent stated that they used social media at least once a week. What exactly the Swedes do on social media is not clear, but we know that they read news among other things. We also know that not all but most of the news on social media leads to traditional news media in the end. The assessment is therefore that it is accessed mainly direct.

Sweden scores low risk (23%) in the Political Independence – Digital area. The Swedish digital native media are not politically controlled. However, there are no rules for political parties, candidates and lists competing in elections to report on campaign spending on online platforms. There is also a lack of transparency on techniques used in political campaigning. This does not necessarily mean political dependence, but at the same time points toward potential risks to the Swedish media plurality. Even though not in Sweden, there are current examples of both irregularities in influencing voters in a certain direction and how the information that users of digital media share with them has been used for targeted political advertising, in some cases incorrect information. Consequently, there is a need to take a bigger general approach on transparency about campaign spending and techniques used by political parties, candidates and lists in political campaigning.

On average, Sweden scores low risk (31%) in the Social Inclusiveness – Digital area. In Sweden about 72% of the population has basic or above basic overall digital skills. At the same time, we can see that threats and hate speech on social media are becoming a widespread phenomenon. Here two things become central. The first is what efforts are made to teach Swedes to behave correctly on the internet. The second thing is who is really responsible for what is expressed on the Internet.

In Sweden there are both media literacy and other educational initiatives aiming to prevent and counteract hate speech. The Swedish Media Council runs the so-called No Hate Speech Movement. The initiative is being implemented, among other things, to raise awareness of racism and similar forms of hostility on the Internet among children and young people. The mission is to disseminate educational tools and information to teachers and parents and includes free educational material on hate, racism and other forms of hostility on the internet.

When it comes to who is responsible attempts have been made to claim responsibility from the provider. In addition to the individual who directly expresses the net hate, it is currently difficult to claim responsibility from the person who is editorially responsible for the page where the net hate was stated. However, there are some limited exceptions, but these are mainly designed on the basis of traditional media and not on the current situation with news media on the Internet,
which means that editorial responsibility rarely becomes relevant. When it comes to criminal liability for things that happen on social media or in comment fields, there is an opportunity in Swedish legislation to claim responsibility from the provider of the social media/ commentary field if the person who hates cannot be held liable in criminal law. However, the possibility does not seem to be used in practice at present, but could be used more.
5. Conclusions

The implementation of the 2020 media pluralism data collection in Sweden shows an overall low risk for media pluralism in the country. However, there are particular issues that blemish the Swedish low risk score. Two such issues relate to the Market Plurality area.

The Swedish media system is concentrated and much of this can be explained by the small size of the Swedish media market but this is not the whole picture. One example is the Swedish state as a main owner of Telia, TV4 and Cmore. Although fact that the Swedish state has a history of not being an active owner, this means that the Swedish government have control of the two market leading broadcasters in Sweden (SVT and TV4) and could be a potential future risk to media plurality in Sweden. Albeit the high risk scores not imply a need for immediate policy changes, the lack of specific media concentration and ownership regulations both offline and online is blatant.

Another issue relates to the Basic Protection area and the standard and protection of the journalistic profession. The composite score for this area is low risk. But if we look beyond the overall score it is apparent that the safety of a journalist is still not even fully guaranteed in a highly developed democratic country as Sweden. Instead, harassment and intimidation form very efficient ways to silence Swedish journalists.

Finally, the high risk score of commercial and owner influence over editorial content is, if albeit not immediate, yet a possible area of concern in the near future. The blurring lines between editorial and advertorial content is a tenacious issue for media credibility and the future of journalism. Investments and business connections of media owners will most likely lead to increased self-censorship in the media. Thus, it is essential for the Swedish state to recognize this as one of the challenges to media and journalism transparency and media credibility.
6. References


SOU 2016:30 Människorna, medierna och marknaden [The people, the media and the market]. Stockholm: Ministry of Culture.
# ANNEXE I. COUNTRY TEAM

<table>
<thead>
<tr>
<th>First name</th>
<th>Last name</th>
<th>Position</th>
<th>Institution</th>
<th>MPM2020 CT Leader</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mathias A.</td>
<td>Färdigh</td>
<td></td>
<td>University of Gothenburg</td>
<td>X</td>
</tr>
</tbody>
</table>

# 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.

<table>
<thead>
<tr>
<th>First name</th>
<th>Last name</th>
<th>Position</th>
<th>Institution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tove</td>
<td>Carlén</td>
<td>Ombudsman</td>
<td>Swedish Union of Journalists</td>
</tr>
<tr>
<td>Christoffer</td>
<td>Lärkner</td>
<td>Desk Officer</td>
<td>Ministry of Culture, Government Offices of Sweden</td>
</tr>
<tr>
<td>Jesper</td>
<td>Strömbäck</td>
<td>Professor</td>
<td>Department of Journalism, Media and Communication, University of Gothenburg</td>
</tr>
<tr>
<td>Stefan</td>
<td>Eklund</td>
<td>Editor in chief</td>
<td>Borås Tidning</td>
</tr>
<tr>
<td>Johan</td>
<td>Lindén</td>
<td>Strategist</td>
<td>Sveriges Television AB</td>
</tr>
</tbody>
</table>