

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: Sweden

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Research Project Report

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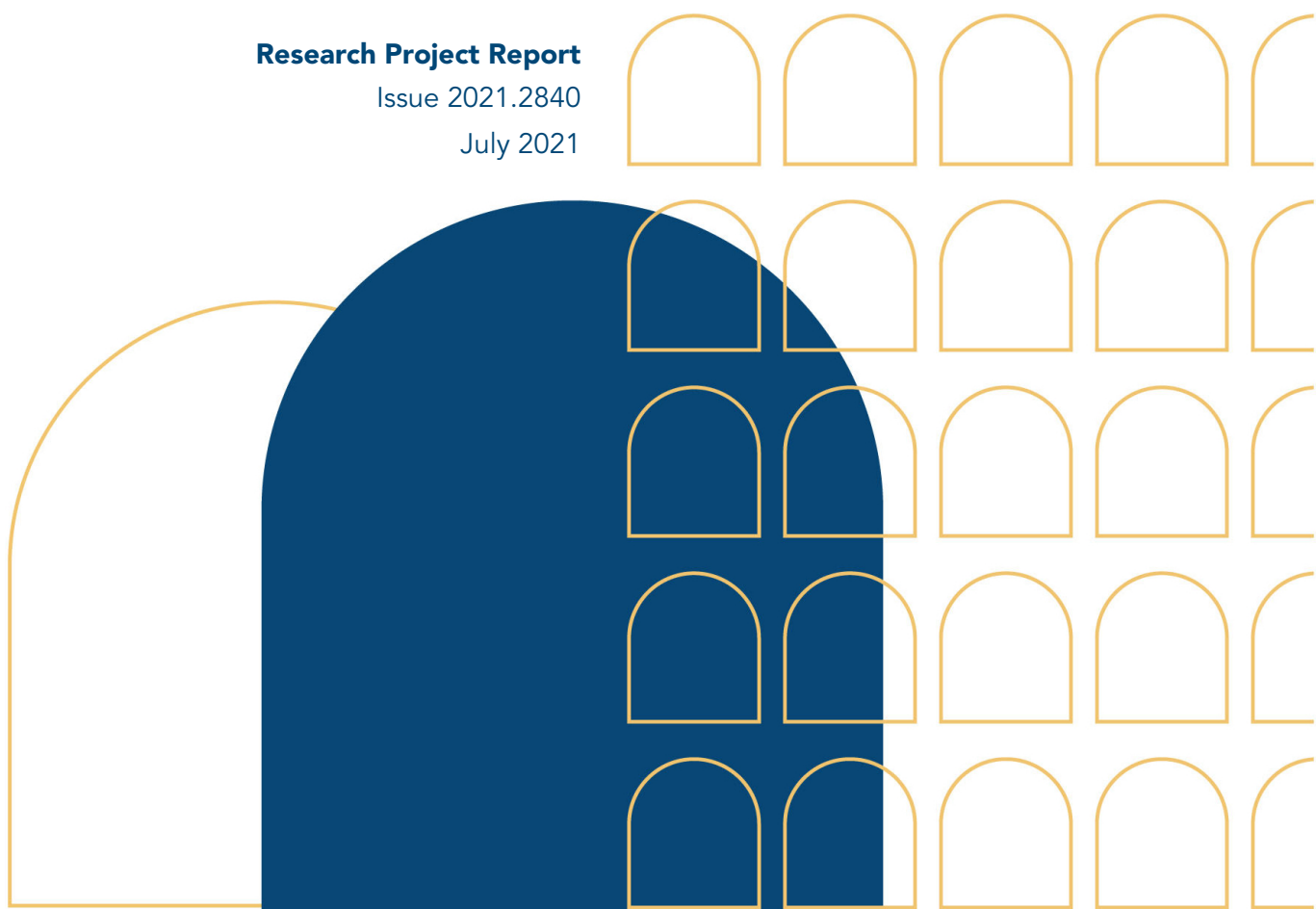


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1. About the project

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

Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).

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

Table 1: Areas and Indicators of the Media Pluralism Monitor

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

Country overview. Sweden is the third-largest country in Western Europe and occupies the greater part of the Scandinavian Peninsula in northern Europe. It is connected to Denmark in the southwest, bordered by Norway on the west and north, and by Finland to the east. In relation to its area, Sweden is one of the least populated countries in Europe, with a population of 10,4 million people. Urban growth in Sweden has followed industrialization and since the 1900th century, many people have moved from the countryside to the cities of Stockholm, Gothenburg, and Malmö.

Languages and minorities. About 19 percent 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.

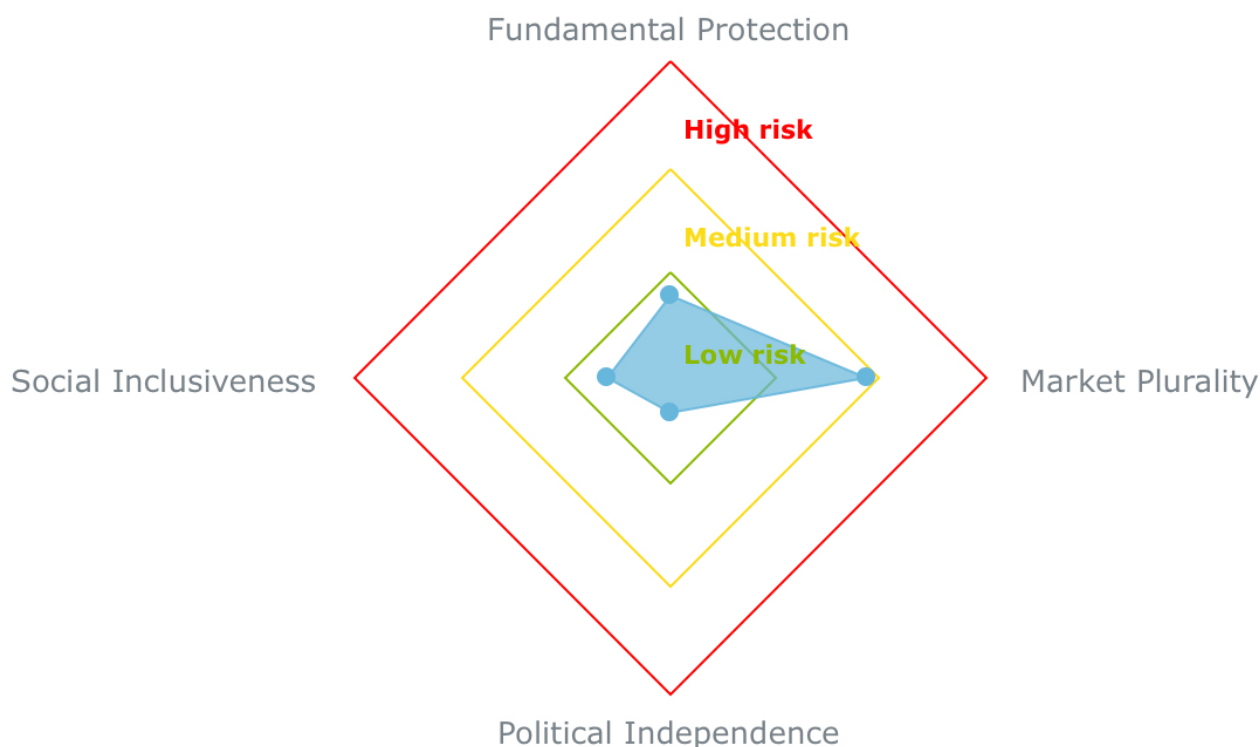
Political situation. Sweden is a parliamentary democracy and the constitution is based on four fundamental laws: the Instrument of Government, the Act of Succession, the Freedom of the Press Act (TF), and the Riksdag Act. The Swedish parliament is unicameral and elected by the Swedish people who are 18 years of age or older 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 percent of the seats, and the Sweden Democrats holding the remainder. 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 next ordinary Swedish parliamentary election will be held in September 2022.

COVID-19. On January 31, 2020, Sweden received its first confirmed case of Covid-19. Since then, at the time of writing, 842,000 people have been infected and 13,578 people have died as a result of Covid-19 in Sweden. The Swedish strategy for dealing with the pandemic has differed from that in most other countries. Although the Swedish strategy entailed drastic restrictions for Swedish society and the Swedes, it was less so than in other countries in that the strategy was largely based on voluntary responsibility. In 2020, GDP fell by 2.8 percent in Sweden, compared with the previous year.

Media market. The Swedish media landscape has undergone major changes and shifts in terms of regulation and structure of revenue. The Swedish media market is dominated by public service broadcasters (SVT, SR, UR) 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. 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

Sweden: Media Pluralism Risk Areas



JS chart by amCharts



The implementation of the 2021 Media Pluralism Monitor (MPM2021) in Sweden shows a generally low risk for media pluralism in the country: 70 percent (14) of the indicators demonstrate low risk, 20 percent (4) of the indicators demonstrate medium risk, and 10 percent (2) of the indicators demonstrate high risk.

These high and medium risk are recorded in the **Market Plurality** area due to a lack of specific thresholds in media legislation to prevent a high degree of concentration of ownership and the unclear line between editorial and advertising content. There is also a risk in the area of Fundamental Protection of right to information, which is primarily due to limitations of the regulatory framework to protect whistleblowers but also since openness in the Swedish society, like much else, has been subjected to severe stress during the Covid-19 pandemic. There are (albeit few) examples where the media's efforts to be able to report and inform have not been fully met.

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.

Except for the Market Plurality area with a medium risk score of 62 percent, the **Fundamental Protection** area shows a low risk score of 26 percent, the **Political Independence** area a low risk score of 11 percent, and the **Social Inclusiveness** area a low risk score of 20 percent risk.

When it comes to the low-risk score of **Fundamental Protection**, the Swedish media system has a long regulatory tradition for media freedom and freedom of expression is explicitly recognised in the Swedish Constitution since 1991 with relatively few cases of violations to freedom of expression in Sweden in recent years.

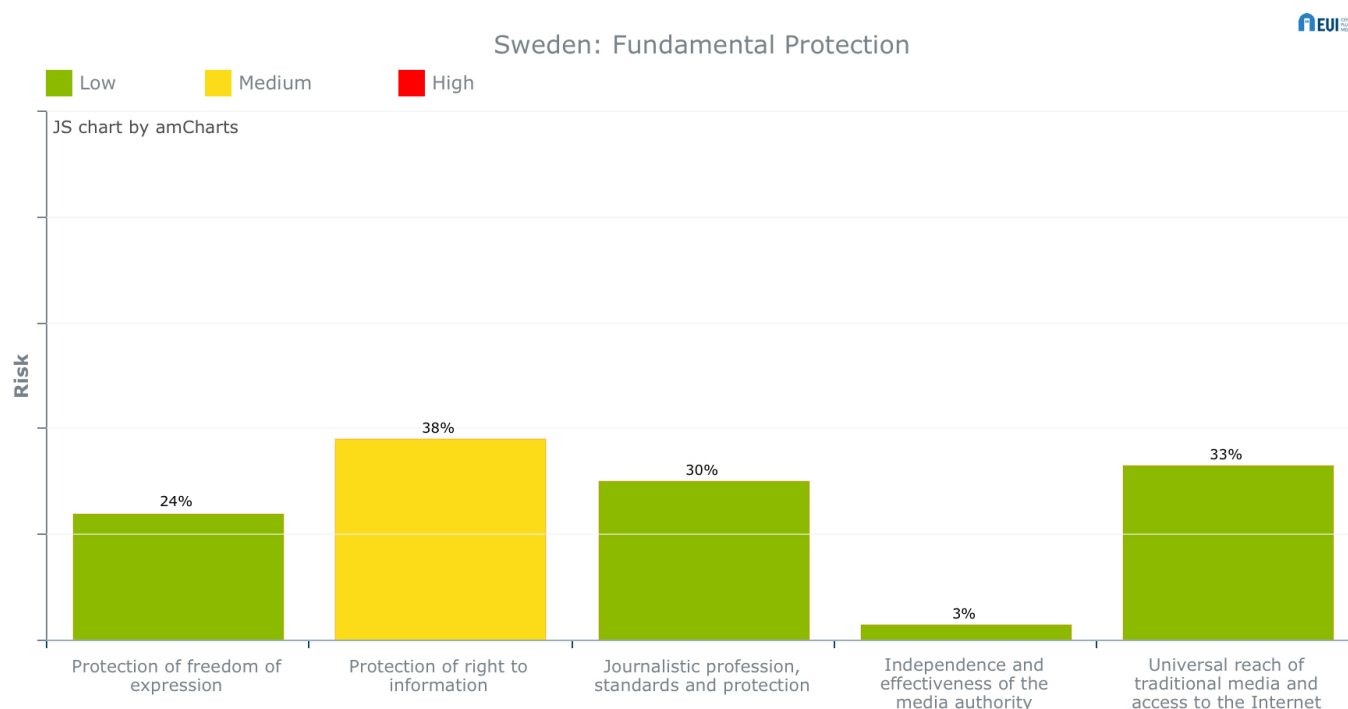
The low risk score on **Political Independence** relates to the Swedish press subsidy which has been supplemented with the so-called "media support" that also includes online publications. Another important factor is the broadcast licence regulating the operations of the Swedish PSM broadcast media in terms of independence from economic interests and from the state.

Finally, the low risk score of **Social Inclusiveness**, relates mainly to the obligation for PSM to offer a diverse range of programs (including programs of mass and more specific appeal), and the Swedish people which have at least basic digital skills and use the Internet on a daily basis, but also that the work for increased media and information literacy (MIK) is more and more developed.

On a general level, the MPM2021 instrument shows potential warnings predominantly due to risks in the market plurality area. But the overall state of media pluralism in Sweden can still be considered good.

3.1. Fundamental Protection (26% - low risk)

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



Sweden scores low risk (26 percent) in the Fundamental Protection area, where all five indicators score between three and 38 percent.

The indicator that measures **Protection of freedom of expression** scores a 24 percent 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, No. 105/1949^[1]) and the constitutional law on Freedom of Expression (SFS, No. 1469/1991^[2]). 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. However, there has been a year-to-year increase of risk on the indicator for protection of freedom of expression. During the Covid-19 spread in Swedish elderly care facilities, there were examples of local governments discouraging health and care workers from speaking with journalists (SVT; Nerikes Allehanda; Eskilstuna-Kuriren). Such requests, together with incorrect interpretations of the provisions on patient confidentiality and risk analysis, is a risk of limiting the freedom of expression and right to transparency.

Sweden scores medium risk (38%) on the indicator that measures **Protection of the right to information**. The legal provisions to protect the right to information are clearly defined. So are the restrictions on the grounds of protection of privacy and confidentiality. Sweden follows the European Convention for the Protection of Human Rights and Fundamental Freedoms (SFS, No. 1219/1994^[3]). There are, however, at the same time some indications of poor implementation. One example is the law to protect whistleblowers (SFS, No. 749/2016^[4]). A debate is currently underway within the Swedish police authority and is based on a case about two female police officers who reported misconduct within the police authority and where at least one, according to information, chose to quit as a police officer due to the consequences of her whistleblowing (Kalla fakta). The law to protect whistleblowers contains provisions that provide special protection against reprisals for workers who are alerted to serious maladministration in the employer's business. However, the law does not provide the protection that may apply for other reasons. The law began to apply on January 1, 2017, but is not fully sufficient and is currently being reworked. In total, Sweden scores a 38 percent risk for this indicator.

The indicator that addresses **Protection and standards of the journalistic profession** demonstrates a score of 30 percent 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. One-third of the journalists are without permanent employment, and the results from the Swedish Journalist Panel at the University of Gothenburg shows that 30 percent of the Swedish journalists answered that they have received threats in the past year and that the most common are threats of physical violence. At the same time, the share of journalists who are exposed to abusive and insulting comments has decreased from 80 percent in 2013 to about 70 percent in 2019. The decrease is largely due to closed comment fields (Löfgren-Nilsson 2019).

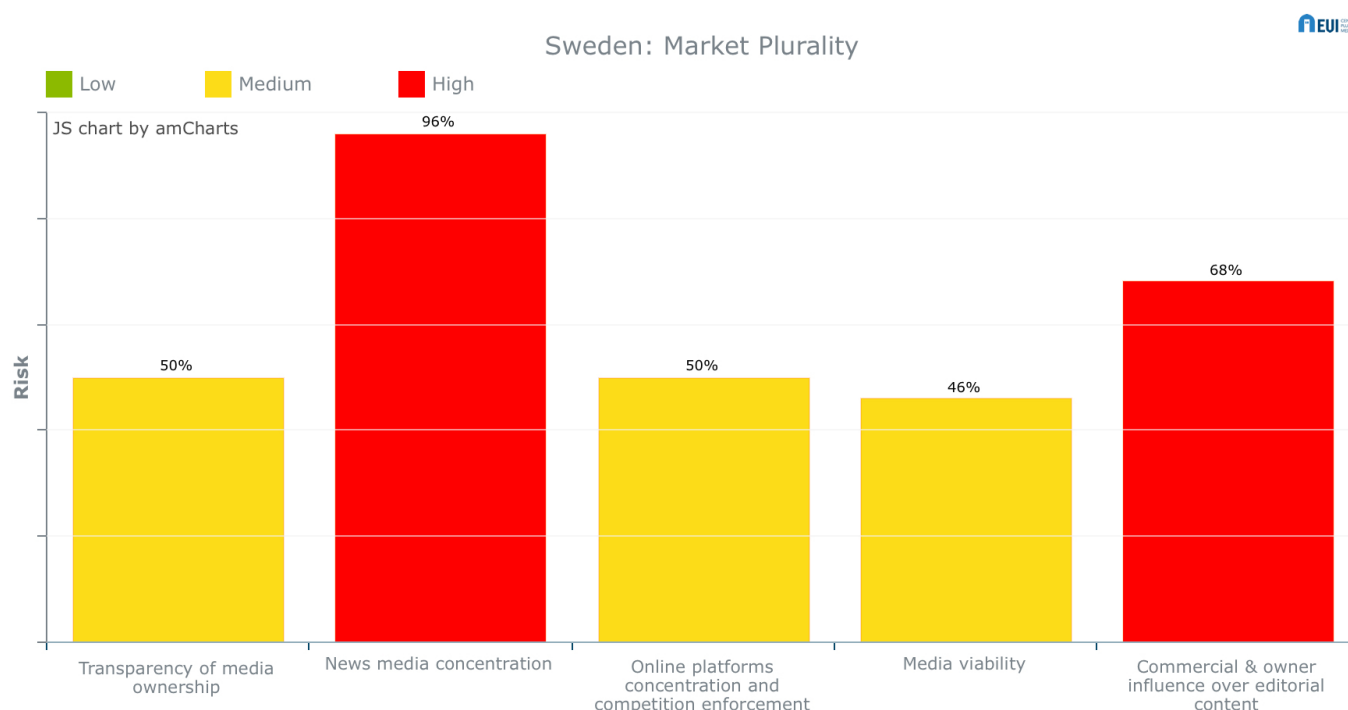
The indicator for **Independence and effectiveness of the media authority** has a risk score of 3 percent. Sweden has effective regulatory safeguards for the independence of the Swedish Press and Broadcasting Authority, limiting the risk of political and commercial interests (SFS, No. 515/2007^[5]; SFS, No. 1062/2010^[6]). The explicit objective of the media authority is to support freedom of expression, diversity, independence and accessibility.

Finally, Sweden scores low risk on the indicator for **Universal reach of traditional media and access to the Internet** (33 percent). In addition to the Swedish Radio and Television Act (SFS, No. 696/2010^[7]) 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 well-developed infrastructure and affordable ICT access, this guarantees a universal coverage of traditional media and access to the Internet in Sweden.

3.2. Market Plurality (62% - medium 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



Overall, Sweden scores medium risk (62 percent) in the Market plurality area, where the five indicators score between 46 and 96 percent. Sweden scores high risk on the indicators for News media concentration (96 percent) and Commercial and owner influence over editorial content (68 percent).

Although media markets in other countries have been hit harder, the Covid-19 pandemic has also had negative consequences for the Swedish media market. As for the total revenues of the news media sector in Sweden, the assessment right now is that it roughly follows economic development. For the first time in five years, advertising sales decreased in Sweden (IRM, 2020).

Reduced advertising revenues and deteriorating finances also mean an increased risk of cuts in the number of journalists. Here the data point to the fact that the main cuts, so far, have been made among freelance journalists and journalists without permanent employment. But the longer the Covid-19 pandemic lasts, the more unsure the forecast of how extensive the consequences will be for the Swedish media market.

The indicator on **Transparency of media ownership** has a medium risk score (50 percent). There are no specific regulations on transparency for media companies in Sweden. 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, No. 590/2005)^[8] which require companies to be transparent about ownership structures and the Competition Act (SFS, No. 579/2008)^[9], and which regulate the ownership concentration. There is a risk of treating media companies in the same way as any other company, and it may have a negative impact on Swedish media plurality in the long term.

Sweden scores high risk on the indicator for **News media concentration** (96 percent) and can be seen as a consequence of what was raised as a possible risk in the indicator for transparency of media ownership previously. The level of news media concentration in Sweden is regulated in the Radio and Television Act (SFS, No. 696/2010, chapt. 4, 11§, 15§ and chapt. 13, 27§-28§) and in the broadcasting licenses. Moreover, the Swedish media sector is regulated on the basis of the general Competition Act. However, the Radio and Television Act (SFS, No. 696/2010) 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”. There are Swedish administrative authorities overseeing compliance with news media concentration and ownership limitations but no clear criteria for them to use.

The indicator on **Online platforms concentration and competition enforcement** produces a medium risk score (50 percent). Most notably for the level of risk for this indicator is still the difficulty in obtaining reliable data. However, and noted in previous MPM implementations, the specifications on online platforms concentration or cross-media ownership specifically are not aimed at media companies specifically in Sweden. The concentration online and cross-media ownership is covered by the Swedish Competition Act (SFS, No. 579/2008) and 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.

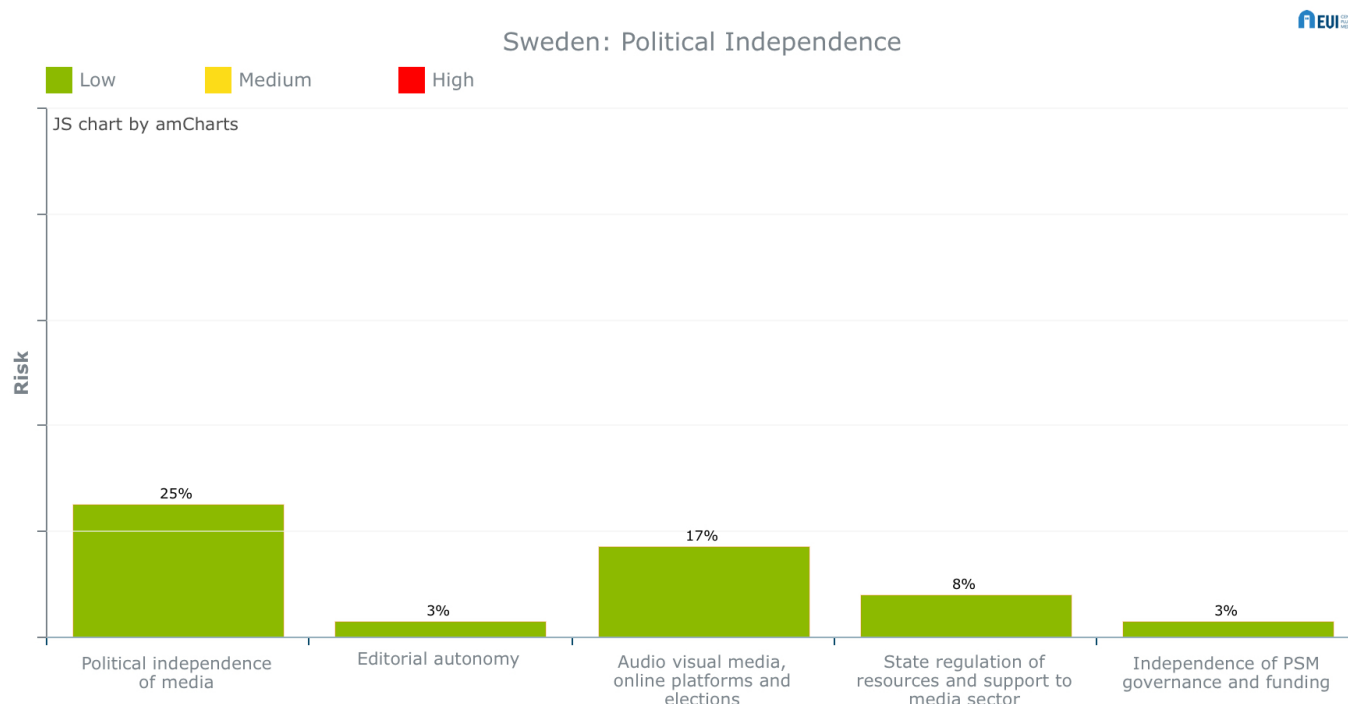
Sweden scores medium risk on the indicator for **Media viability** (46 percent). The Swedish TV industry is still under a major transformation. The audience is moving from traditional TV to online, and now also beginning to gain substantial revenue for online-based TV services. This means that the part of the revenues for Swedish television that comes from digital services continues to grow. Since 2012, the Internet is the largest advertising platform on the Swedish media market. In the latest report from Reuters Institute, it was also clear 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).

Finally, Sweden scores high risk on the indicator for **Commercial and owner influence over editorial content** (68 percent). 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 highlighted in previous MPM implementations, 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 the Swedes to see the difference between advertorials and editorial material.

3.3. Political Independence (11% - 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 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.



Sweden scores low risk (11 percent) in the Political Independence area, where all five indicators score between 3 and 25 percent.

The indicator for **Political independence of media** scores low risk in Sweden (25 percent). 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.

The indicator for **Editorial autonomy** scores a low risk (3 percent). 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.

Sweden scores a low risk on the indicator for **Audio visual media, online platforms and elections** (17 percent). 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, which is 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). But there is still a need for specific regulations that ensure transparency about campaign spending and techniques used in political campaigns online.

Sweden scores a low risk on the indicator for **State regulation of resources and support to media**

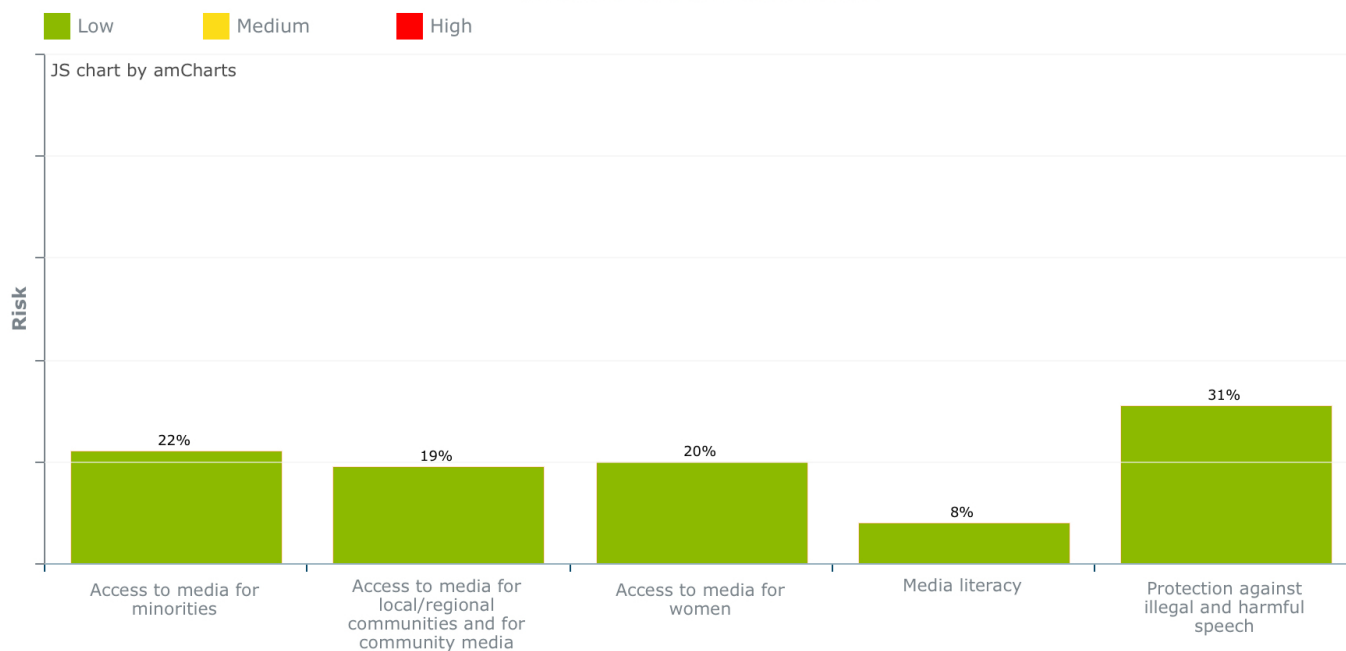
sector (8 percent). Since February 1, 2019 the Swedish press subsidy has been supplemented with the so-called "media support" that also includes online publications (SFS, 2018:2053). The media support is an extended innovation and development support for local journalism in areas that lack or have weak journalistic coverage. The purpose of the new grants is to strengthen democracy by promoting public access to news media throughout the country with high quality editorial content. The new grants are technology-neutral and should be available to general news media regardless of content or distribution. This means that other media than just newspapers will be able to seek support. How well this media support has turned out is little too early to say. Additionally, and as a reaction to the Covid-19 pandemic, the Swedish government also initiated an extra media support programme. This extra media support entails an increase by SEK 200 million per year, where SEK 150 million will be a temporary distribution support for printed newspapers, while the remaining SEK 50 million will double the support for coverage of areas that lack or have weak journalistic coverage.

Finally, the indicator for **Independence of PSM governance and funding** acquires a low risk score (3 percent). The broadcast licence regulates the operations of the Swedish PSM broadcast media in terms of independence from economic interests and from the state. Media independence is also regulated by the Swedish Radio and Television Act and the Freedom of Expression Act. The appointment procedures are well defined and provide for the independence of the Swedish PSM boards and management. There are no indications or any examples of conflicts concerning appointments or dismissals of managers and board members of the Swedish PSM.

3.4. Social Inclusiveness (20% - low 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.

Sweden: Social Inclusiveness



On average, Sweden scores low risk (20 percent) in the Social Inclusiveness area, where the five indicators score between 8 and 31 percent, and without any major changes compared to the previous MPM2020.

Despite the low risk in the Social Inclusiveness area, openness in society, like much else, has been subjected to severe stress during the Covid-19 pandemic. The majority of Swedish people use the Internet on a daily basis and have at least basic digital skills. However, 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 scores low risk on the indicator for **Access to media for minorities** (22 percent). 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^[10], the Swedish broadcasters are expected to give minority media access to media platforms and not least to improve accessibility (6§-7§, 12§). 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 (12§). 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 2020). In the new charter/license 2020-2025 for the Swedish PSM^[11], 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 (Section 4.4.1).

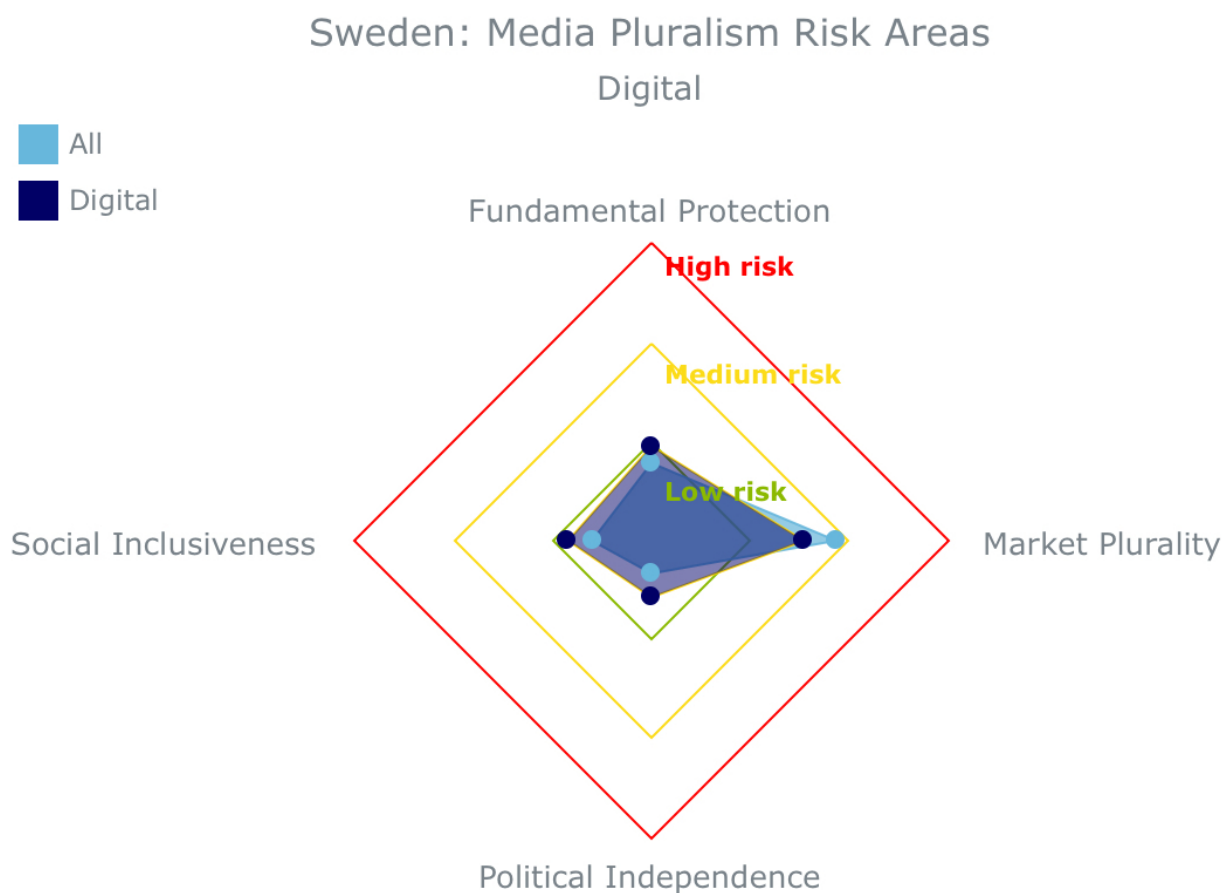
The indicator for **Access to media for local/regional communities and for community media** scores a low risk (19 percent). In Sweden, the independence of community media encompasses both diversity in media content and media providers (see SFS, 2010:696, SFS, 1990:524 and Dir 2015:26. See also SFS, 2010:1062). 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.

Sweden also scores low risk on the indicator for **Access to media for women** (20 percent). The Swedish law on equal rights (SFS, 2008:567) is reactive and can especially be used when individuals believe they have been disadvantaged. 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.

The indicator for **Media literacy** produces a low risk score in Sweden (8 percent). 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.

Finally, Sweden scores low risk on the indicator for **Protection against illegal and harmful speech** (31 percent). Illegal and harmful speech is applied in the Swedish Freedom of Expression Constitutional Law (SFS, 1991:1469). At the same time, it is important to emphasize that the problem with illegal and harmful speech also must be understood in relation to the platforms used. It is currently difficult to claim responsibility online but there is an opportunity in Swedish legislation to claim responsibility from the provider if the person behind illegal and harmful speech cannot be held liable. This possibility does not seem to be used in practice at present, but could be used more.

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



JS chart by amCharts



Sweden scores low risk (32 per cent) in the **Fundamental 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 authorities are not filtering or removing online content in an arbitrary way, and Swedish citizens have access to effective legal remedies to address potential violations. ISPs, filtering and removals of online content are regulated in the Act of Electronic Communication (SFS, No. 389/2003^[12]) and in the Act of the collection of data on electronic communication in the law enforcement intelligence (SFS, No. 278/2012), and is reported in a clear and transparent way.

When it comes to journalism and data protection, the Swedish law on data retention obligations still only partially comply with articles 8 and 10 of the European Convention on Human Rights. The obligation for Swedish operators to store data for law enforcement purposes was reintroduced in Sweden in 2019. In early 2020, there were also additional rules for operators using so-called NAT technology. Previously, a decision of the European Court of Justice stated that the Swedish legislation was not compatible with EU law^[13]. Therefore, the Swedish government is introducing a number of new regulations to fully comply with articles 8 and 10 of the European Convention on Human Rights.

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, No. 105/1949) and the Freedom of Expression Law (SFS, No. 1469/1991) take precedence over the GDPR. This means that both constitutionally protected and unprotected media will be able to use personal data in the same way as before the implementation of the new Data Protection Act.

Sweden scores medium risk (51 percent) 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 the 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, No. 590/2005).

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, as mentioned previously, since the legislation does not contain any clearer criteria than that ownership may not change more than to a limited extent, this is of course still problematic. The two administrative authorities overseeing compliance with the ownership limitations need clearer criteria in order to be able to ensure a “healthy” concentration of media ownership with regard to Swedish media plurality.

In the Market Plurality area, and specifically in the indicator on online platforms and competition enforcement, the direct access to the news online contributes to lower the risk. In the latest report from the SOM Institute, 79 percent of the Swedes stated that they used a digital news service at least once a week (Swedish Trends 1986-2019). 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 the Swedes about their use of social media in the same survey. 72 percent stated that they used social media at least once a week. However, what the Swedes exactly 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. As for the concentration in the digital advertising market, we have no evidence due to lack of data.

Sweden scores low risk (19 percent) in the **Political Independence** – Digital area.

Digital native media are not politically controlled in Sweden. However, as reported in previous MPM implementations, there are still no regulations 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. Thus, there is still a need to take a more general approach on transparency about campaign spending and techniques used by political parties, candidates and lists in political campaigning.

Sweden scores low risk (28 percent) in the **Social Inclusiveness** – Digital area.

In Sweden, about 72 percent of the population has basic or above basic overall digital skills. There are both media literacy and other educational initiatives aiming to prevent and counteract hate speech and disinformation. The Swedish Media Council runs the 'Global MIL Week', with resources for discerning

disinformation, and the 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. As mentioned previously, it is difficult to claim individual responsibility online. However, and even though still not used in practice, one opportunity could be to claim responsibility from the provider if the person behind illegal and harmful speech cannot be held liable.

5. Conclusions

The implementation of the 2021 Media Pluralism Monitor 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. High and medium risk 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 unclear line between editorial and advertising content.

In the area of Fundamental Protection, there is also a risk, which is primarily due to limitations of the regulatory framework to protect whistleblowers (it should also be noted that this indicator is new and has not been used in previous MPM implementations). Another issue in the Fundamental Protection area relates to the standard and protection of the journalistic profession. One third of the journalists do not have a permanent employment and their safety is not necessarily guaranteed. Löfgren Nilsson and Örnebring (2015, 8) summarize the problem in a clear manner: "All together our results show that intimidation and harassment indeed constitutes an effective way to silence journalists even in a democratic context." It is remarkable in a developed democracy like Sweden in 2021, that the safety of journalists are still not fully guaranteed.

Openness in society, like much else, has been subjected to severe stress during the Covid-19 pandemic. This is also reflected in the area of Fundamental Protection of right to information. During the Covid-19 pandemic, the demand for credible information sometimes has been set against a need for stability and social protection, sometimes even under a statement of concern for protection of personal integrity. During deep crises, fundamental freedoms and rights are put to the test, even renegotiated. There is a risk that established and fundamental democratic values will be nibbled at the edge and not as fundamental as before. Thus, in strange times like these, it is particularly important to both protect and ensure that such a decline is only temporary.

6. Notes

- [1] Freedom of the Press Act No. 105/1949 (Tryckfrihetsförordning), <https://lagen.nu/1949:105>
- [2] Constitutional law on Freedom of Expression No. 1469/1991, <https://lagen.nu/1991:1469>
- [3] Law No. 1219/1994, Lag om den europeiska konventionen angående skydd för de mänskliga rättigheterna och de grundläggande friheterna 1994:1219 - Ministry of Justice - 1994, <https://lagen.nu/1994:1219>
- [4] Law no. 749/2016, "Lag om särskilt skydd mot repressalier för arbetstagare som slår larm om allvarliga missförhållanden", <https://lagen.nu/2016:749>
- [5] Swedish Authority Regulation No. 515/2007 (Myndighetsförordning), <https://lagen.nu/2007:515>
- [6] Law No. 1062/2010 (Förordning med instruktion för Myndigheten för press, radio och tv), <https://lagen.nu/2010:1062>
- [7] Swedish Radio and Television Act No. 696/2010 (Radio- och tv-lag), <https://lagen.nu/2010:696>
- [8] Law No. 590/2005, Lag om insyn i vissa finansiella förbindelser m.m., <https://lagen.nu/2005:590>
- [9] Law No. 579/2008, Konkurrenslag, <https://lagen.nu/2008:579>
- [10] <https://www.regeringen.se/4abd2c/contentassets/8c24422cf3ce41848af8d36a8983638a/tillstand-for-sveriges-television-ab-att-sanda-tv-och-sokbar-text-tv.pdf>
- [11] <https://www.regeringen.se/4a73d0/contentassets/9657b451d2054254b61e0e7d0ca24e44/ett-modernt-public-service-nara-publiken--villkor-20202025-prop.-201819136.pdf>
- [12] Act of Electronic Communication (Lag om elektronisk kommunikation), No. 389/2003, <https://lagen.nu/2003:389>
- [13] European Court of Human Rights - Cases C²⁹³/12 and C⁵⁹⁴/12, <http://curia.europa.eu/juris/document/document.jsf?jsessionid=DF71C6BED6DF9B0EDF388F148A63828E?text=&docid=150642&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=15617234>

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Annexe I. Country Team

First name	Last name	Position	Institution	MPM2021 CT Leader
<i>Mathias A.</i>	<i>Färdigh</i>	<i>Assistant Professor</i>	<i>University of Gothenburg</i>	X

Annexe II. Group of Experts

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 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 reflects 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>Tove</i>	<i>Carlén</i>	<i>Ombudsman</i>	<i>Swedish Union of Journalists</i>
<i>Jesper</i>	<i>Strömbäck</i>	<i>Professor</i>	<i>Department of Journalism, Media and Communication, University of Gothenburg</i>
<i>Mart</i>	<i>Ots</i>	<i>Associate Professor</i>	<i>MMTC, Jönköping International Business School, Jönköping University</i>
<i>Stefan</i>	<i>Eklund</i>	<i>Editor in chief</i>	<i>Borås Tidning</i>
<i>Yvonne</i>	<i>Andersson</i>	<i>Researcher and analyst</i>	<i>The Swedish Media Council, Government Offices of Sweden</i>

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