

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

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

Country report: Sweden

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Research Project Report

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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool that is designed to identify potential risks to media pluralism in the Member States of the European Union and in Candidate Countries. This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2022. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological notes

Authorship and Review

The CMPF partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire that was developed by the CMPF.

In Sweden the CMPF partnered with Mathias A. Färdigh (Department of Journalism, 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 the media	Representation of minorities
Protection of right to information	Plurality of media providers	Editorial autonomy	Local/regional and community media
Journalistic profession, standards and protection	Plurality in digital markets	Audiovisual media, online platforms and elections	Gender equality in the media
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to the media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Editorial independence from commercial and owners' influence	Independence of PSM	Protection against disinformation and hate speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

The Digital Dimension

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

The Calculation of Risk

The results for each thematic area and Indicator are presented on a scale from 0 to 100%.

Scores between 0% and 33%: low risk

Scores between 34% and 66%: medium risk

Scores between 67% and 100%: high risk

With regard to the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

Methodological Changes

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

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

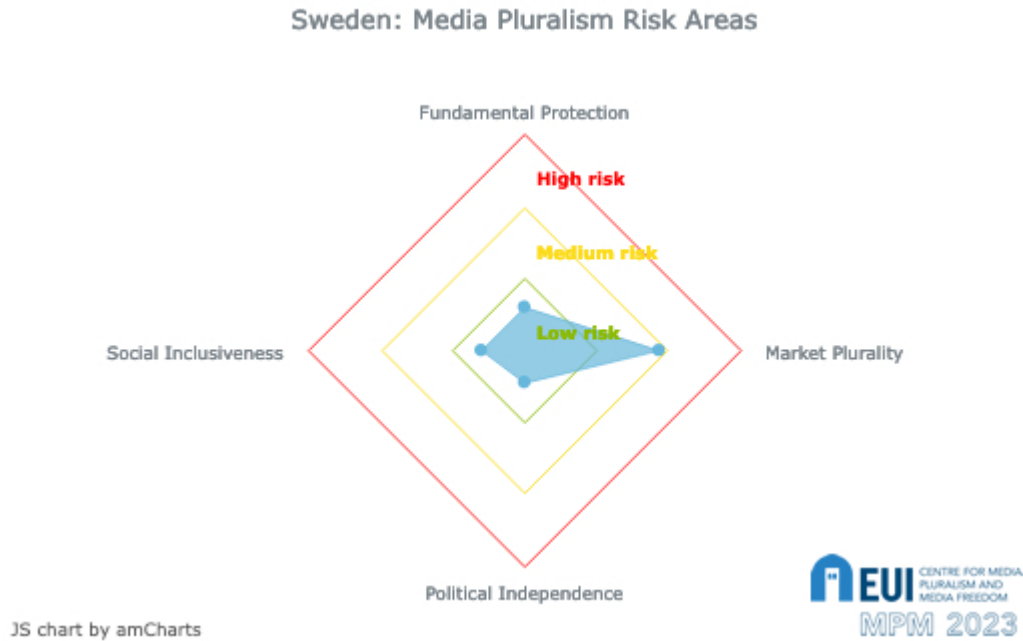
Disclaimer: The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team who carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2023 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2023, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

- **Country overview:** Sweden, located in northern Europe, occupies the largest part of the Scandinavian Peninsula and is the third-largest country in Western Europe. It is bordered by Norway to the west and north, Finland to the east, and connected to Denmark in the southwest. Despite its size, Sweden is one of the least densely populated countries in Europe, with a population of 10.4 million. Urbanization in Sweden has been driven by industrialization, and since the 1900s, many people have moved from rural areas to cities like Stockholm, Gothenburg, and Malmö. Approximately 19 percent of the population was born in another country, and 2 million Swedes are under 18 years old.
- **Languages and minorities:** The official language of Sweden is Swedish, and most Swedes are proficient in English as well. In addition to Swedish, there are five official national minority languages, and a wide range of other languages are spoken by the diverse population, with Finnish, Serbo-Croatian, Arabic, Kurdish, Spanish, German, and Farsi being the most common after Swedish.
- **Economic situation:** Just as the Swedish economy was starting to recover from the Covid-19 pandemic, Russian President Vladimir Putin ordered a military invasion of neighboring Ukraine, leading to instability in Europe and negative consequences for economic development in Sweden and the rest of the world, as predicted in the latest MPM2022. As a result, economic growth in Sweden has been lower than anticipated, and inflation higher (the inflation rate was 10.2 percent in December 2022). The unemployment rate in Sweden increased by 1.2 percentage points to 7.6 percent in January 2023, compared to November 2022. The GDP in Sweden was SEK 5,926 billion (approx. EUR 593 billion) in 2022, with a 0.5 percent decrease during the fourth quarter 2022 compared to the previous quarter. In 2022, the Swedish GDP grew by 2.6 percent.
- **Political situation:** Sweden is a parliamentary democracy and the Swedish 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 its members are elected by the Swedish people who are 18 years of age or older through proportional representation multi-member party lists for a four-year term. The political landscape in Sweden follows a traditional left-right dimension. The last Swedish general election in 2022, resulted in government negotiations between the Moderate Party (M) and representatives from the Christian Democrats (KD), the Liberal Party (L) and the Sweden Democrats (SD). Through the so-called Tidö Agreement, the parties agreed that Ulf Kristersson (M) would form a minority government with the Moderate Party, the Christian Democrats and the Liberal Party, and that the parties would have close cooperation with the Sweden Democrats. On October 17, 2022, Ulf Kristersson was elected prime minister by the Swedish Riksdag with 176 votes for (M, KD, L and SD) and 173 votes against (S, V, C and MP). It is the first time that the Sweden Democrats have a direct influence on the government's policy. On May 18, 2022, Sweden applied for membership in NATO with broad support in the Swedish Riksdag.
- **Media market:** The economic situation is also reflected in the Swedish media economy. According to statistics from Sweden's Media Agencies, investments declined by as much as 9.8 percent compared to February 2022 (www.sverigesmediebyraer.se). This means just over SEK 100 million in lost advertising revenue for the Swedish media industry. But there are also bright spots in the Swedish media economy. Media, that on the contrary, show a growth are cinema, radio, and tabloids.

- **Regulatory environment:** Swedish media is governed by the Freedom of the Press Act and the Freedom of Expression Act. The former applies to print media, while the latter covers radio, television, film, and video. The Swedish media companies have automatic constitutional protection under the Freedom of Expression Act for their online publications. Individuals can also apply for a publishing certificate since 2002 to receive similar protection. The Radio and Television Act regulates broadcasting, including pay-TV and introduced the audiovisual directive, which covers video recording platforms, child protection, programs of European origin, accessibility for people with disabilities, and advertising regulations.

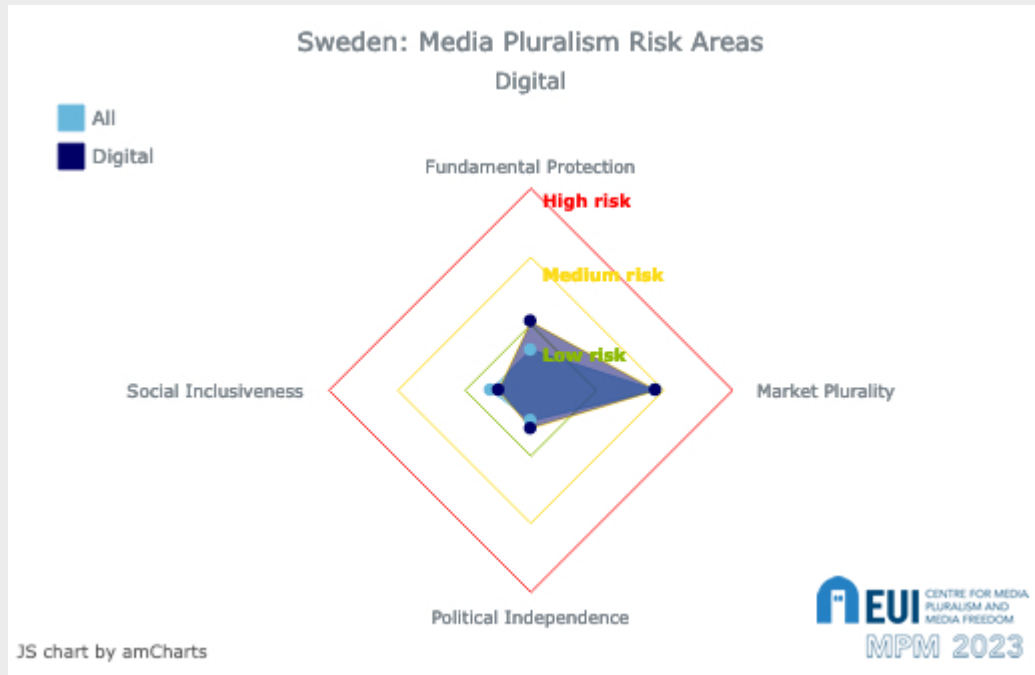
3. Results of the data collection: Assessment of the risks to media pluralism



The implementation of the 2023 Media Pluralism Monitor (MPM2023) in Sweden shows a generally low risk for media pluralism in the country. Three areas are associated with a low risk: **Political independence** (15%), **Fundamental protection** (20%), and **Social inclusiveness** (20%), While one area is associated with a medium risk : **Market plurality**, 62%. The medium risk of the Market plurality area can be attributed to the concentration of markets (in terms of media providers and in the digital markets) and insufficient editorial independence from commercial and ownership influences. 75% (15) of the indicators demonstrate low risk, 10% (2) of the indicators demonstrate medium risk, and 15% (3) of the indicators demonstrate high risk.

In general, the results are stable and have not changed to any great extent since the previous implementation in 2022, but where the most notably are changes in a positive direction for **Media viability** (from 32% to 14%), and in negative direction for **Journalistic profession, standards and protection** (The risk level changed from 33 to 39% and is now in the medium risk band). The indicator that has changed the most in a negative direction is the one that previously was about **Online platforms concentration and competition enforcement** (50 % in MPM2022) but now entitled **Plurality in digital markets** (81% in MPM2023) and has gone through some changes (see Methodological Notes, above).

Focus on the digital environment



Two indicators that specifically target the digital environment demonstrate a greater risk across all areas. The area for **Fundamental protection** is associated with a medium risk with 34%, **Political independence** area shows a low risk at 19%. There is no difference in the **Market plurality** area between the digital score and the overall score. For the **Social inclusiveness** area, the digital risk associated with the area is lower, with 16%.

Regarding the 14 percentage points variation in the **Fundamental protection** area, it is primarily attributed to regulations implemented to deter the dissemination of Russian propaganda within the European Union. Another crucial area to emphasize within this area is the working conditions of journalists. There are online threats and assaults against journalists, and measures aimed at preventing illegal monitoring of journalists are not sufficient to ensure legal protection of journalists' confidentiality, as operators are obligated to retain data for law enforcement purposes.

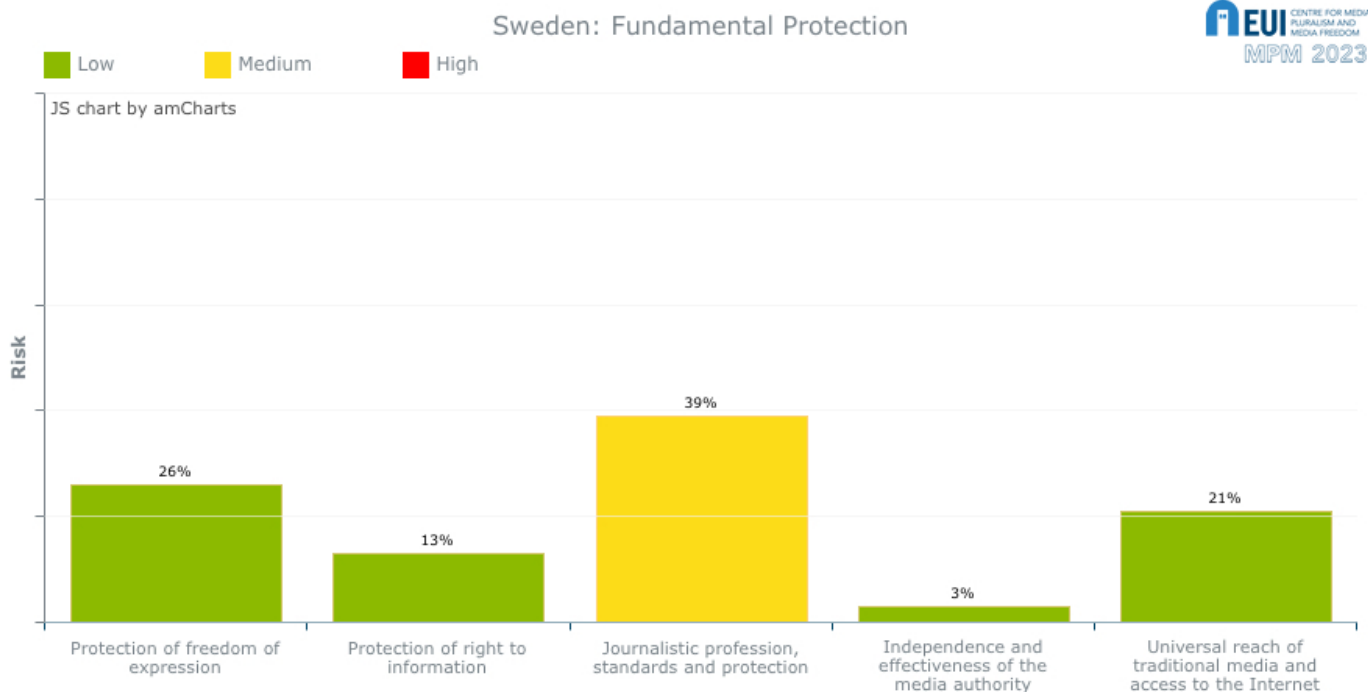
The **Market plurality** area shows hardly any variation, with only a 1 percent difference. This slight variation is caused by the absence of regulations that mandate the disclosure of ownership details and regulatory safeguards to prevent an excessive concentration of ownership, which applies not only to the digital media sector.

The higher score for the **Political independence** area in the digital environment is primarily caused by inadequate rules and transparency for political actors to report on their spending and techniques employed on online platforms.

Lastly, in the **Social inclusiveness** area, there is a significant 17 percentage points difference resulting from the absence of a comprehensive strategy to combat disinformation, as well as inadequate mechanisms to report incidents of online hate speech. The application of existing legislation and enforcement of infringements could be used more effectively.

3.1. Fundamental Protection (20% - low risk)

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



Sweden scores low risk (20%) in the **Fundamental Protection** area and is on an overall level unchanged since the last MPM implementation. However, if we go behind the overall risk level and look at how the risk levels have changed for the sub-indicators, there have been some, albeit relatively small, changes.

The indicator that measures **Protection of freedom of expression** scores a 26% which is a deterioration of two percentage points compared to the previous implementation of the MPM. As mentioned in MPM2022, the Swedish media system has a long regulatory tradition for media freedom with the 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. Despite a marginal change, there are mainly one factor that has increased the risk assessment and principally important to highlight. On January 1, 2023, the Swedish Riksdag voted through a constitutional amendment that criminalizes foreign espionage and introduces it as a violation of freedom of press and expression. Therefore, it becomes a criminal offense to provide information that could harm Sweden's relations with other states or organizations. This is a limitation of the freedom of expression, and in an area where transparency is most important, in Sweden's international efforts. Even if the intention is not to provide information to a foreign power, the disclosure of classified information becomes punishable (for example whistleblowers, investigative journalism).

Sweden scores low risk on the indicator that measures **Protection of the right to information** (13%) and is no change compared to MPM2022 but an indication that the higher levels of risk (38%) measured in the implementation of MPM2021 were probably an exception. The legal provisions to protect the right to

information are clearly defined in the Swedish constitution. So are the restrictions on the grounds of protection of privacy and confidentiality. Sweden additionally follows the European Convention for the Protection of Human Rights and Fundamental Freedoms (SFS, 1994:1219). The Swedish Parliament approved a new law on 29 September 2021 to implement the EU Directive on Whistleblowing (SFS, 2021: 890). The new law appears to have had a positive impact, it is, however, still too early to assess its effectiveness.

The indicator that addresses **Journalistic profession, standards and protection** is now associated with a medium risk, with a score of 39% risk which is six percentage points higher risk than the previous year. Compared to other parts of the world, Swedish journalists enjoy highly favorable working conditions. However, recent studies have shown that a significant proportion of Swedish journalists face hatred, threats, and insults. In a study conducted by Lund University and Halmstad University, 70 percent of respondents reported being subjected to insults, while 23 percent reported being exposed to illegal threats in the past three years (Svensson & Björkenfeldt 2021). An earlier survey by the University of Gothenburg found that just over four out of ten journalists who had been threatened refrained from covering certain subjects, individuals, or groups due to the perceived risk of further threats (Löfgren-Nilsson 2019).

The indicator that measures **Independence and effectiveness of the media authority** has an unchanged risk score of 3%. Sweden has established robust regulatory measures to safeguard the independence of the Swedish Press and Broadcasting Authority, which reduces the risk of undue influence from political and commercial interests (SFS, 2007:515; SFS, 2010:1062). The media authority comprises a chairman, six members, and four deputies, all of whom are appointed by the Swedish government. They are not politically appointed but instead come from diverse backgrounds in the media industry and academia. The chairman of the board is required to be, or to have been, a judge. The media authority's explicit mandate is to uphold freedom of expression, diversity, independence, and accessibility. To achieve this, the media authority examines whether radio and television broadcasts adhere to the regulations outlined in the broadcasting licenses and the Radio and Television Act.

Finally, Sweden scores low risk on the indicator for **Universal reach of traditional media and access to the Internet** (21%) and is thus unchanged compared to the previous MPM2022. The universal coverage of both public service media (PSM) and private media is governed by broadcasting licenses, the Swedish Radio and Television Act (SFS, 2010:696), and the constitutional law on Freedom of Expression (SFS, 1991:1469). In conjunction with well-established infrastructure and affordable access to information and communication technologies (ICT), this ensures universal coverage of traditional media and access to the internet throughout Sweden.

Focus on the digital environment

Sweden scores low digital risk (34%) in the **Fundamental Protection** area - digital. The current risk level is still categorized as low risk, but it represents a six percentage point deterioration compared to MPM2022. Freedom of expression online is well-defined in Swedish law and aligned with international and regional human rights standards. The Swedish regulatory framework includes detailed laws that cover online as well as offline violations of rights, and the Swedes have access to effective legal remedies to address any such violations. The Act of Electronic Communication (SFS, 2003:389) and the Act of the Collection of Data on Electronic Communication in Law Enforcement Intelligence (SFS, 2012:278) regulate internet service providers (ISPs), filtering, and removals of online content.

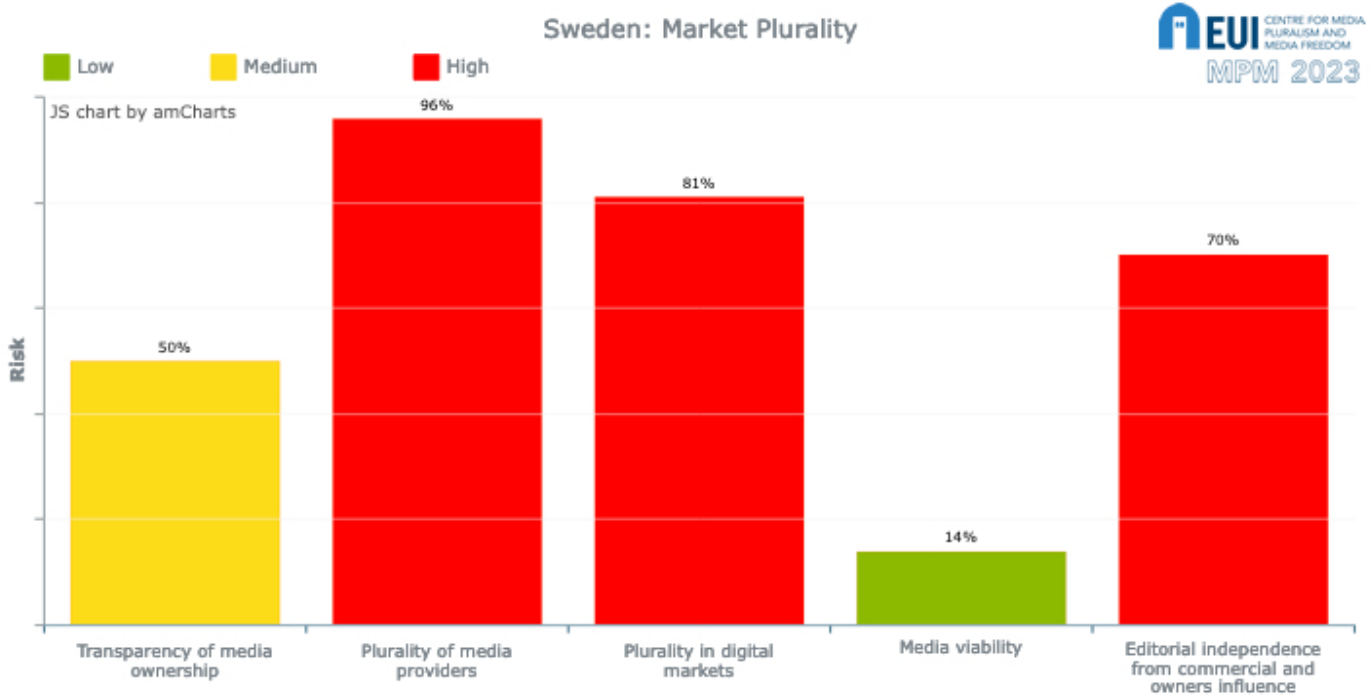
Sweden has a strong legal framework and a tradition of trusting its citizens to critically evaluate information from various media sources. Therefore, it is particularly concerning when this trust is undermined. In March 2022, the Council of the European Union adopted a regulation to ban the Russian state-controlled media channels Russia Today and Sputnik from broadcasting in the EU. This regulation also applies in Sweden, where the Swedish Post and Telecom Agency (PTS) is the supervisory authority. PTS interpreted the legislation to mean that "blocking content on networks may be in violation of the Swedish net neutrality regulation. However, this regulation allows blocking if it is required, e.g. to meet the requirements of the EU. The current regulation creates such an exception." This is an unprecedented form of censorship and an instance of online content blocking in Sweden, even though it is mandated by the Council of the European Union. This is deeply concerning.

An additional aspect that deserves attention is the safeguarding of online protection for journalists. As stated in MPM2022, the Swedish Parliament has expressed its endorsement of proposal 2018/19:2026, which seeks to enhance the protection of journalists who are under threat and conveyed this message to the Swedish government. This aligns with the recommendations put forth by organizations such as Reporters Without Borders, which stress the need for the implementation of laws that enable increased prosecution for online harassment directed at journalists and demand that online platforms assume greater responsibility for the content shared on their platforms, particularly the proliferation of threats and hate speech.

There are also instances where laws designed to improve digital security have inadvertently made it harder for journalists to perform their duties. An example of this is the requirement for operators to retain data for law enforcement purposes, which compels them to store electronic communication data for police access. However, there is no assurance that information protected by a journalist's duty of confidentiality will not be stored and disclosed to law enforcement. While there is legal safeguarding of journalistic confidentiality in other coercive measures, there is no comparable protection for data storage.

3.2. Market Plurality (62% - medium risk)

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



Overall, Sweden scores medium risk (62%) in the **Market Plurality** area, showing the same risk level but at a higher score in comparison with the previous year. The five indicators that comprises the area score between 14 and 96% risk. Sweden scores high risk on the indicator for **Plurality of media providers** (96%), **Plurality in digital markets** (81%) and **Editorial independence from commercial and owners influence** (70 %).

The indicator that addresses **Transparency of media ownership** has a medium risk score of 50%. As mentioned in previous MPM implementations, the medium risk score is attributed to the absence of specific regulations concerning transparency for media companies in Sweden. While all companies are bound to comply with general regulations outlined in the Swedish Law of Financial Relations, also known as the Transparency Act (SFS, 2005:590), which requires transparency in ownership structures, and the Competition Act (SFS, 2008:579), which regulates ownership concentration, this only addresses the issue in part. As a result, Swedish regulations may be insufficient to ensure media pluralism. However, the Radio and Television Act has been amended in March 2023 to provide for the disclosure of more information concerning media ownership structures for all audiovisual media and radio service providers.

In relation to this, Sweden ranks as high risk for the **Plurality of media providers** indicator (96%), which is evident from the issue mentioned above. Although this is not a change from the previous year, the high risk remains. The concentration of news media in Sweden is regulated by the Radio and Television Act (SFS, 2010:696, chapter 4, sections 11 and 15, and chapter 13, sections 27-28) and broadcasting licenses, as well as the general Competition Act. However, closer examination of the ownership criteria reveals that

more needs to be done. As noted in previous implementations of the MPM, phrases like "ownership may not change more than to a limited extent" in the Radio and Television Act are insufficient in ensuring reasonable levels of news media concentration.

The indicator for **Plurality in digital markets** produces a high risk score (81%) and is a noticeable deterioration since the MPM2022. At the same time, it is important to note that the sub-indicators for this indicator have changed since the MPM2022 implementation. One of the main challenges associated with this indicator is the limited availability of dependable data. Despite this, it is worth noting that the regulations on online platform concentration and cross-media ownership, as stipulated in previous MPM implementations, do not exclusively target media companies in Sweden. The Swedish Competition Act (SFS, 2008:579) covers online and cross-media ownership concentration for all Swedish companies, without any sector-specific discrimination. However, we believe that the existing competition laws may not be fully equipped to address the challenges posed by the digital landscape.

Sweden scores low risk on the indicator for **Media viability** (14%) with positive results related to digital media. However, the risk score should be interpreted cautiously, as revenue trends for the Swedish media market in the year 2022 were not yet available at the time of writing - the indicators on sector-specific revenues were thus not counted when assessing the risk score. According to the latest report from Reuters Institute, Sweden (along with Norway) has experienced the highest growth in terms of paying for news online (Reuters Institute, 2022). This trend is reflected in other reports, which indicate that an increasing number of Swedes are turning to streaming services for audiovisual content, online radio, podcasts, and digital newspapers. The digital era has opened new avenues for media financing and advertising investments. However, the downside is that these investments don't necessarily benefit Swedish media companies but instead go to global web companies and social media networks. As a result, Swedish media lose out on revenues while competing with global players to maintain their audience share.

Finally, Sweden scores high risk on the indicator **Editorial independence from commercial and owner influence** (70%) which is a deterioration since the previous MPM2022. Journalists and all members of the Swedish Union of Journalists (SJF) are bound by professional rules that incorporate measures to maintain independence and impartiality. Breaches of these rules can be reported to the journalists' ethics committee within three months of the incident. However, as noted in previous MPM implementations, determining the boundary between advertorials and editorial content remains a challenging task. This blurring of lines can erode the credibility of media outlets, and it is all too often difficult for Swedes to distinguish between the two.

Focus on the digital environment

The digital risk level for the **Market Plurality** is 62%, same level of the overall risk. It has increased compared to MPM2022. The main reason for the deterioration is related to the new indicator on **Plurality in digital markets**, which replaces the indicator on "Online platforms and competition enforcement" (see Methodological Notes).

There are two administrative authorities responsible for enforcing ownership restrictions and handling complaints in Sweden. The Swedish Media Authority is primarily responsible for monitoring media companies, while the Swedish Competition Authority oversees all Swedish companies. However, despite the existence of these two authorities, there are currently no media-specific regulations that

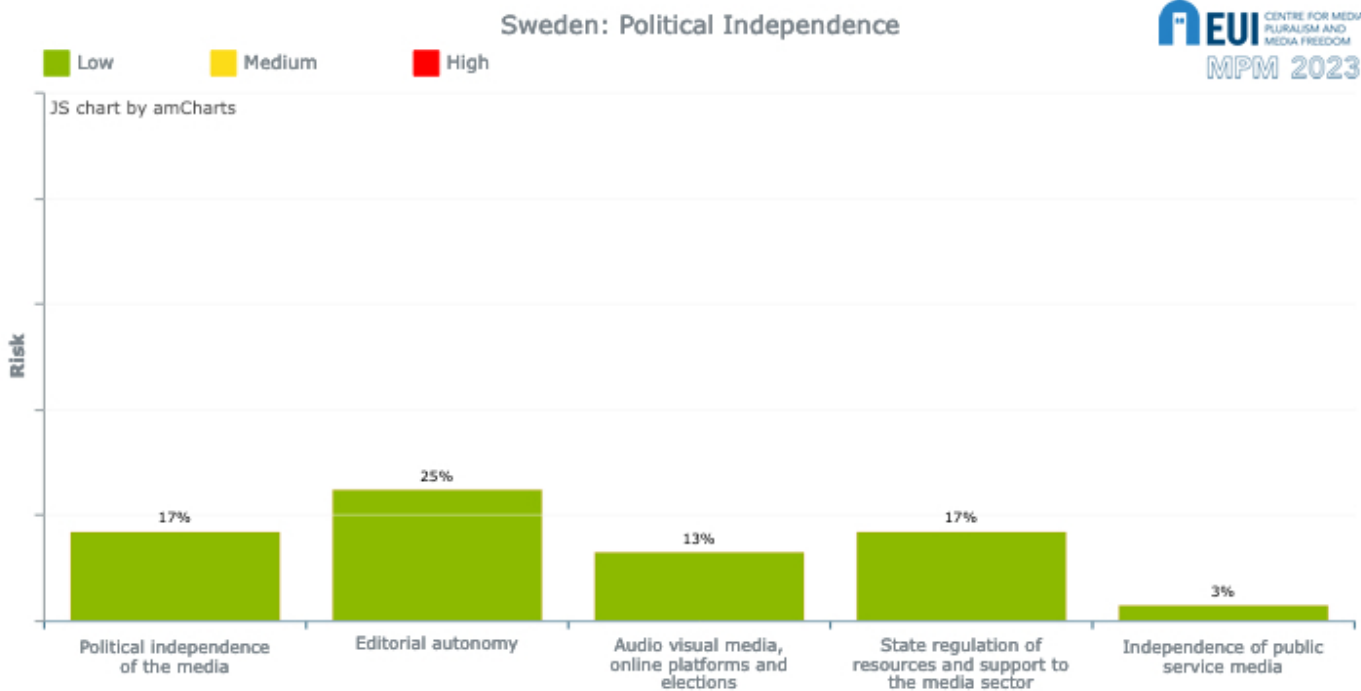
prohibit a high level of ownership concentration. As a result, all companies, regardless of their sector, are subject to the same treatment.

The concentration of audience in the online sphere is high, with the first four players (Alphabet-Google, Meta, Aftonbladet and Expressen) gathering almost 70% of the monthly traffic. The transposition of Directive EU 2019/790 on copyright and related rights has been voted by the Swedish Riksdag on November 2022.

Simultaneously, there have been developments regarding the issue of media market plurality in the digital environment. On 16th September 2022, the European Commission proposed a regulation that establishes a uniform framework for media services within the internal market, also known as the European Media Freedom Act. The regulation is accompanied by a recommendation to Member States and media companies that focuses on safeguarding editorial independence and ensuring transparency of media ownership. The proposal will likely be considered during Sweden's EU presidency from 1 January to 30 June 2023, but as there is no law in place yet, the digital risk level for this indicator is unchanged.

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



Sweden scores low risk (15%) in the **Political Independence**, in deterioration since the last MPM2022. The five indicators that comprises this area score between 3 and 25%, in the low risk band.

The indicator that addresses **Political independence of the media** scores low risk (17%) and is a positive change since the assessment in the last MPM implementation. Despite the reduced risk score, the risk is still primarily associated with the absence of regulation rather than actual wrongdoing. Some digital native media outlets rely on state subsidies to sustain themselves, which could potentially compromise their independence. However, there have been no instances of conflicts of interest between media owners and ruling parties, partisan groups, or politicians to date.

The indicator that measures **Editorial autonomy** scores a low risk (25 %) and even if it is within the limits of a low risk assessment, this is something worth paying attention to. The Swedish Freedom of the Press Act (SFS, 1949:105) regulates autonomy in appointing and dismissing editors-in-chief. In addition, a significant number of media and journalist organizations such as Sveriges Radio AB (SR), Sveriges Television AB (SVT), and Utbildningsradion AB (UR), Publicistklubben (PK), Svenska Journalistförbundet (SJF), Svenska Tidningsutgivareföreningen (TU), and Sveriges Tidskrifter have collaborated to develop several self-regulatory and voluntary codes of conduct to ensure editorial independence, which the majority of Swedish media adhere to. However, there are no regulatory safeguards, such as internal bodies or self-regulatory instruments, to prevent commercial interests from influencing decisions on the appointment or dismissal of editors-in-chief, except for the objectives agreed upon within the employment framework.

Sweden scores a low risk on the indicator for **Audio visual media, online platforms and elections** (13 %). The Media Election Survey, which has been conducted during every parliamentary election in Sweden since 1979, indicates that both PSM and commercial media generally provide proportional and unbiased representations (Johansson & Strömbäck, 2019). However, there is a high risk associated with the rules for political parties, candidates, and lists competing in elections to report campaign spending transparently on online platforms. Furthermore, there are no instances confirming any investigations conducted by the Swedish Authority for Privacy Protection regarding the use of personal data by political parties for electoral campaigning purposes. The analysis highlights the need for specific regulations to ensure transparency about campaign spending and techniques employed in political campaigns online.

Sweden scores a low risk on the indicator **State regulation of resources and support to media sector** (17%) this area includes whether the state advertising is distributed to media outlets in a fair and transparent manner. There are some criterias for State advertising and regulated in the Swedish Marketing Act (SFS, 2008:486), but since the regulations does not fully address the transparency of the State advertising, it is also difficult to determine whether it is fairly distributed to media outlets. Media support is an extensive initiative designed to support the innovation and development of local journalism in areas with insufficient or weak news coverage. The grants are technology-neutral and are available to general news media regardless of their content or distribution. This means that media outlets beyond print newspapers are also eligible to apply for support.

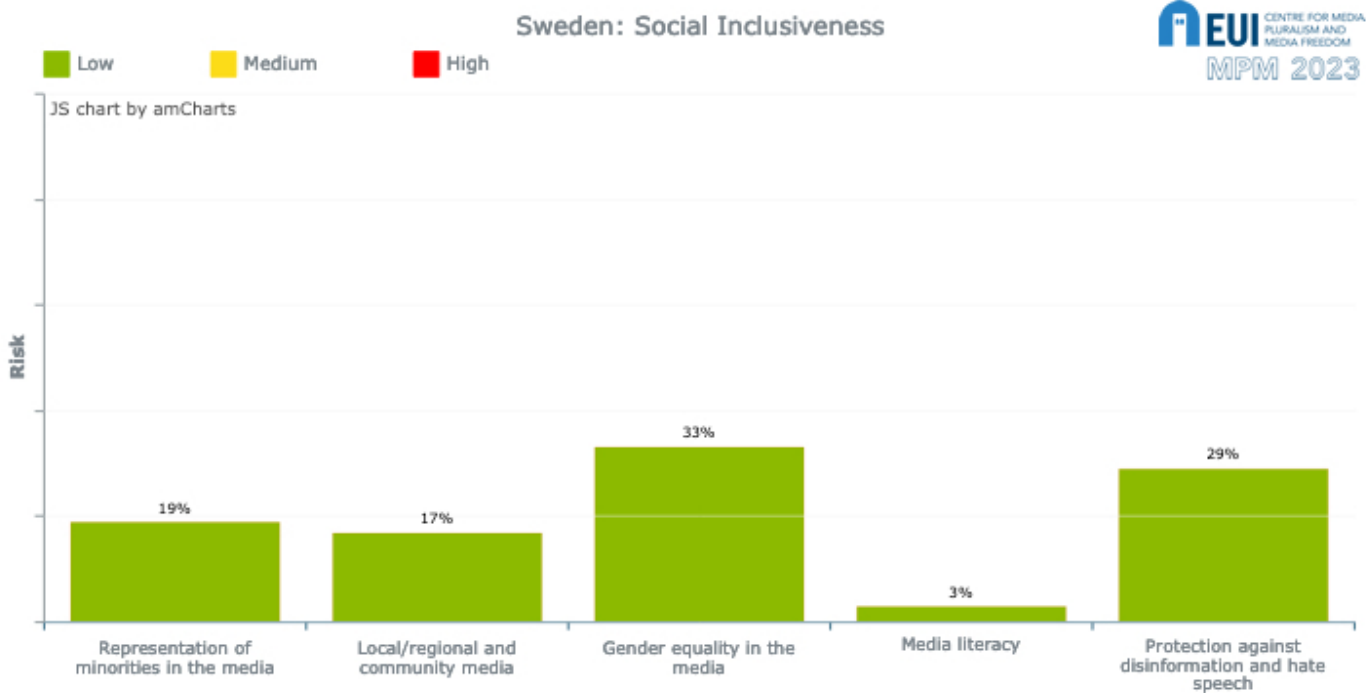
Finally, the indicator that measures **Independence of public service media** acquires a low risk score (3%) and is unchanged compared to the previous MPM2022. The Swedish PSM is regulated by broadcast licenses, which ensure their operations are independent from both economic interests and the state. Additionally, the Swedish Radio and Television Act (SFS, 2010:696) and the Freedom of Expression Act (SFS, 1991:1496) regulate media independence. The appointment procedures for Swedish PSM boards and management are well-defined, allowing for their independence. There have been no conflicts or instances of disputes regarding the appointment or dismissal of managers and board members of the Swedish PSM.

Focus on the digital environment

The digital risk level for the **Political Independence** area ends up at 19%. There is currently no direct political control over digital native media in Sweden. However, as noted earlier, the lack of specific regulations surrounding the transparency of campaign spending on online platforms for political parties, candidates, and lists participating in Swedish elections poses a significant risk. This lack of regulation also extends to transparency surrounding the techniques used in online political campaigns. While this does not necessarily imply that news media is politically biased, it does highlight the potential risks in this area. Therefore, there is an ongoing need for a more comprehensive approach to ensuring transparency regarding campaign spending and techniques employed by political parties, candidates, and lists during online political campaigning. This could include implementing guidelines or regulations that require political entities to disclose their online campaign strategies and budgetary allocations, and to provide transparency about the sources of funding for their campaigns. Additionally, it may be beneficial to provide training and educational resources to help media outlets and the public at large better understand the role of digital media in politics and the potential risks associated with it.

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. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against disinformation and hate speech.



On average, Sweden scores low risk (20%) in the **Social Inclusiveness** area and is a decline of 2 percentage point compared with the previous year. The five indicators that comprises this area score between 3 and 42%.

Sweden scores low risk on the indicator for **Representation of minorities in the media** (19%) and is three percentage points lower risk compared to the previous MPM2022. Swedish broadcasters have a responsibility to cater to the needs of physically challenged individuals and the linguistic and ethnic minorities within the country. In Sweden, social and cultural groups have guaranteed access to airtime on PSM channels. The Swedish PSM broadcasting licenses include conditions regarding airtime for the five minority languages: Sami, Finnish, Meänkieli, Romani Chib, and Yiddish. Through agreements with SR and UR, SVT broadcasts news in Finnish and Sámi, while SR broadcasts news programs in Romani Chib and Meänkieli (SVT, 2022). The 2020-2025 charter/license for Swedish PSM explicitly requires broadcasters to provide news to an increased number of minority groups within the country.

The indicator for **Local/regional and community media** scores a low risk (17%) and entails an unchanged risk compared to the previous MPM2022. In Sweden, the independence of community media encompasses both diversity in media content and media providers. The Swedish PSM has an agreement to offer a diverse range of programs that reflect the entire country's diversity and are characterized by high quality, versatility, and relevance, with accessibility for all.

Sweden scores low risk on the indicator for **Gender equality in the media** (33%) which is a higher level of

risk compared to the previous MPM2022. Similarly, to other indicators used in the implementation of MPM2023, the sub-indicators used to measure gender equality in the media have changed since last MPM implementation, making comparisons difficult. The Swedish media sector is governed by the Swedish law on equal rights (SFS, 2008:567). The broadcast licenses also contain more explicit requirements for program content to promote diversity and equality, which is interpreted as a balanced representation of women and men in practice. Additionally, the PSM has a comprehensive gender equality policy that covers both personnel issues and programming content.

The indicator for **Media literacy** produces a low risk score in Sweden (3%) which is an amelioration of 5 percentage points compared to the previous MPM2022. The Swedish Government has tasked the Swedish Media Council with enhancing efforts to increase media and information literacy (MIK) by improving collaboration and activities in this field. The assignment involves establishing a network for stakeholders working on MIK-related issues, building a platform for knowledge and information dissemination, mapping further developments in the MIK area, and expanding the authority's MIK resources.

Finally, Sweden scores low risk on the indicator for **Protection against disinformation and hate speech** (29%). Hate speech is addressed in the Swedish Freedom of Expression Constitutional Law (SFS, 1991:1469) and in chapter 5 of the so-called Brottsbalken (SFS, 1962:700). As stated in previous MPM implementations, it is essential to highlight that the issue of disinformation and hate speech needs to be considered in light of the platforms used and the challenges associated with holding individuals accountable for their online actions. While Swedish legislation allows for providers to be held responsible when the person behind disinformation and hate speech cannot be held liable, this provision is still not commonly enforced.

Focus on the digital environment

Sweden scores low digital risk (16%) in the **Social Inclusiveness** area. It is important to note that the focus of measuring digital risks within this area has shifted from protecting against illegal and harmful speech to safeguarding against disinformation and hate speech since MPM2022.

As mentioned earlier, hate speech is addressed in the Swedish Freedom of Expression Constitutional Law (SFS, 1991:1469) and in chapter 5 of the Brottsbalken (SFS, 1962:700). However, Sweden currently lacks specific laws or policies that aim to counter disinformation. The country instead controls disinformation indirectly through broadcasting licenses and media support distributed by the state, as well as through initiatives to promote media literacy among Swedes. There are several examples of collaborations between various entities to counter disinformation. For example, during last year's election campaign, the Psychological Defense Agency collaborated with Meta, the owner of Facebook and Instagram, to counter the spread of disinformation and influence campaigns. The Swedish media industry has also taken different fact-checking initiatives. Some are ongoing, such as Källkritikbyrå.se, while others occur during specific events like political debates and elections, such as Faktiskt.se. Nonetheless, despite these efforts, the lack of specific laws or policies aimed at countering disinformation in Sweden is a concern, especially in the context of the increasing digital risks associated with disinformation. As such, there is a need for Sweden to develop a more comprehensive approach to address disinformation and its effects on society.

4. Conclusions

The implementation of data collection for the 2023 Media Pluralism Monitor in Sweden reveals that the country has a generally low risk for media pluralism. However, there are certain areas that pose a high risk and other areas that require close monitoring, as the trends appear to be moving in the wrong direction.

In the area of **Fundamental Protection**, there are indications that essential values associated with media pluralism and media freedom are being challenged. This is not due to any explicit political animosity towards democratic values, but rather because of an increasingly uncertain security and political climate, including a war being waged in Europe. As a result, fundamental freedoms and rights that were once taken for granted are no longer guaranteed. However, for Sweden, this is more of a gradual deterioration with a risk of further development if left unchecked and unaddressed.

One area that requires careful attention is changes to legislation that have a direct or indirect impact on media and journalism. For instance, the recent constitutional amendment criminalizing foreign espionage also limits freedom of expression by making the disclosure of classified information punishable. This can have significant implications for whistleblowers and investigative journalism, particularly in areas where transparency is crucial for Sweden's international efforts. Another example is the EU's regulation banning the Russian state-controlled media channels Russia Today and Sputnik from broadcasting, which could also be linked to digital risks within the realm of Fundamental Protection. Despite Sweden's strong legal framework and tradition of trusting its citizens to evaluate information critically from various media sources, it is essential to maintain this framework. Finally, there are cases where laws intended to enhance digital security may unintentionally hinder journalists from carrying out their duties.

- Sweden needs to strengthen and uphold its legal framework that supports media pluralism and media freedom. This could include reviewing and amending any legislation that limits freedom of expression or restricts the ability of journalists to perform their duties. Additionally, it is crucial to remain cautious of any further deterioration in fundamental freedoms and rights, and to proactively address any emerging challenges to media pluralism and media freedom.

In the area of **Market Plurality**, the risk score for Sweden is relatively high due to the absence of specific regulations concerning the transparency of media ownership. This lack of transparency in media ownership structures can hinder the diversity of media outlets and the representation of different voices and perspectives. It can also lead to concentration of ownership, where a few large corporations or individuals have significant control over the Swedish media landscape, potentially leading to biased reporting and a lack of editorial independence. The risk associated with the absence of transparency in media ownership has been emphasized in multiple implementations of the Media Pluralism Monitor and is a challenge that Sweden needs to address to ensure the continued vibrancy and pluralism of its media landscape. Implementing clear and effective regulations for media ownership transparency could help prevent concentration of media ownership and increase the diversity of media outlets, ultimately promoting a healthy and pluralistic media environment.

- The proposed European Media Freedom Act sets out several requirements for member states, media

companies, large platform companies, and other stakeholders operating in the media market, aimed at ensuring the public's right to access a variety of free and independent media. If approved, the proposed regulation would drive positive change in this area in Sweden. By implementing the requirements outlined in the act, Sweden can work towards ensuring a diverse and pluralistic media environment that allows for the free exchange of information and ideas. Additionally, ratification of the act would demonstrate Sweden's commitment to upholding media freedom and protecting the public's right to access diverse media sources.

The area of **Political Independence** continues to be the lowest risk area in Sweden. This is because digital native media in Sweden currently operate without direct political control. However, there is a lack of specific regulations concerning transparency of campaign spending on online platforms for political parties, candidates, and lists participating in Swedish elections, as well as transparency around the techniques used in online political campaigns. This lack of regulation poses a potential risk to political independence, although it does not necessarily imply that news media is politically biased. To mitigate this risk, it is important for Sweden to establish clear regulations that ensure transparency in political campaign spending and techniques used in online political campaigns. This would help maintain the integrity of the political process and ensure that the public has access to accurate information when making decisions during elections.

The lack of transparency regarding campaign spending and techniques employed by political parties, candidates, and lists during online political campaigning in Sweden highlights the need for a more comprehensive approach to ensure political independence in the country.

- To address this issue, guidelines or regulations should be established that require political entities to disclose their online campaign strategies and budgetary allocations. This would include transparency about the sources of funding for their campaigns, which would promote more fair and unbiased political reporting. Such measures would help to ensure that political parties are held accountable and that the public can make informed decisions during elections.

Sweden scores low risk on all sub-indicators in the **Social Inclusiveness** area. However, there is a potential future risk related to the lack of regulations addressing disinformation, which is the first part of the sub-indicator measuring **Protection against disinformation and hate speech**. Although hate speech is regulated in Sweden, the absence of specific laws or policies aimed at countering disinformation is a concern, particularly given the growing digital risks associated with disinformation. To mitigate this risk, it may be necessary to develop guidelines or regulations that focus on countering disinformation and promoting media literacy in Sweden.

- Sweden needs to develop a more comprehensive approach to address disinformation and its effects on the Swedish society. This should involve the implementation of more specified regulations to counter disinformation and ensure transparency, particularly in the context of increasing digital risks.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2023 CT Leader
<i>Mathias</i>	<i>A. Färdigh</i>	<i>Senior Lecturer, Director of Studies</i>	<i>Department of Journalism, University of Gothenburg</i>	X

ANNEXE II. GROUP OF EXPERTS

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

First name	Last name	Position	Institution
<i>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>Henrik</i>	<i>Selin</i>	<i>Stategist</i>	<i>Sveriges Television (SVT)</i>

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