

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN MEMBER STATES AND CANDIDATE COUNTRIES IN 2023

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 2023. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This year a part of the MPM has also been piloted in Bosnia and Herzegovina and Moldova. 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. 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).

• 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.

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

- **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. 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/>.

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, MPM2024 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 MPM2024, which is available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

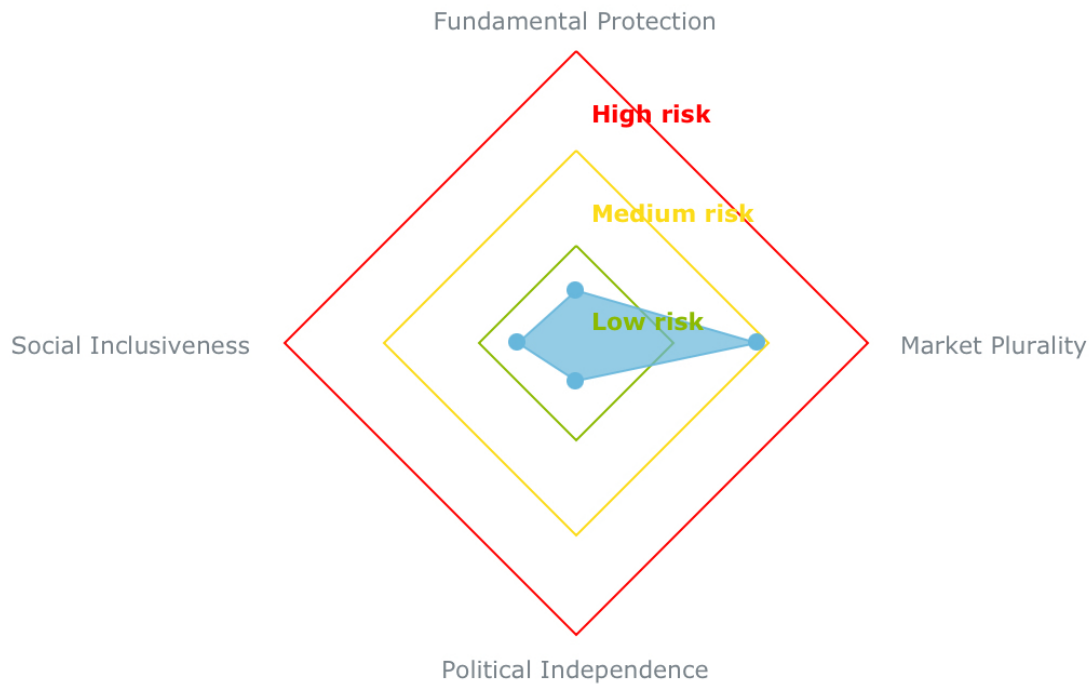
- **Country overview:** Sweden, situated in northern Europe, encompasses the largest portion of the Scandinavian Peninsula and ranks as the third-largest country in Western Europe. It shares borders with Norway to the west and north, Finland to the east, and is connected to Denmark in the southwest. Despite its expansive size, Sweden boasts one of the lowest population densities in Europe, with a populace of 10.6 million. Urbanization in Sweden has been propelled by industrialization, prompting a significant migration from rural regions to urban centers such as Stockholm, Gothenburg, and Malmö since the 1900s. Approximately 22 percent of the population was born abroad, and 57 percent fall within the age bracket of 20 to 64 years old.
- **Languages and minorities:** The official language of Sweden is Swedish, with a majority of Swedes also being proficient in English. Apart from Swedish, there are five officially recognized national minority languages, and a diverse array of other languages are spoken by the populace. Finnish, Serbo-Croatian, Arabic, Kurdish, Spanish, German, and Farsi are among the most commonly spoken languages after Swedish.
- **Economic situation:** The Swedish economy is currently experiencing a recession, marked by high inflation and rising interest rates, which have particularly impacted interest-sensitive households and the construction of housing. However, forecasts suggest that Sweden's economy will begin to recover in 2024, albeit at a sluggish pace. The labor market has also weakened, with the unemployment rate expected to climb to 8.5 percent over the course of the year. The GDP in 2023 was -0.1% and with an inflation rate of 5.9%. Overall, real GDP growth is anticipated to be a modest 0.2 percent in 2024.
- **Political situation:** Sweden operates as a parliamentary democracy, with its constitution grounded in 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, with members elected by the electorate aged 18 or older via proportional representation multi-member party lists for a four-year term. Politically, Sweden aligns along a traditional left-right spectrum. In the most recent general election of 2022, negotiations ensued between the Moderate Party (M) and representatives from the Christian Democrats (KD), the Liberal Party (L), and the Sweden Democrats (SD). Through the Tidö Agreement, it was decided that Ulf Kristersson (M) would lead a minority government comprising the Moderate Party, the Christian Democrats, and the Liberal Party, with close collaboration with the Sweden Democrats. Ulf Kristersson was elected prime minister by the Swedish Riksdag on October 17, 2022, with 176 votes in favor (from M, KD, L, and SD) and 173 votes against (from S, V, C, and MP). This marked the first time the Sweden Democrats had direct influence on government policy. On March 7, 2024, Sweden officially became a member of NATO.
- **Media market:** The economic downturn is also evident in the Swedish media industry. Within the Swedish daily press sector, revenues have dwindled from a positive growth of +4.5 percent to +2.3 percent, primarily due to escalating costs related to paper and distribution. Additionally, the year 2023 witnessed a noticeable decline in advertising investments, prompting several players in the daily newspaper market to enact cost-cutting measures, including reductions in publication frequency and staffing. Contrastingly, the landscape appears different in the digital media market. In 2022, a record-breaking SEK 49.5 billion was poured into advertising, marking an unprecedented level of investment. However, during 2023, advertising expenditures saw a sharp decline. Two significant changes introduced at the outset of the year, the establishment of a new Swedish media support system and the

merger of two media authorities into a singular entity, the Swedish Agency for the Media, aimed at enhancing media and information literacy within Sweden. Although the ramifications of these changes are not yet fully realized, both the new media support and the consolidated media authority were initiated on January 1, 2024.

- **Regulatory environment:** The Swedish media landscape operates under the jurisdiction of both the Freedom of the Press Act and the Freedom of Expression Act. The former governs print media, while the latter extends its purview to radio, television, film, and video. Swedish media entities benefit from automatic constitutional protection under the Freedom of Expression Act for their online publications. Since 2002, individuals also have the option to apply for a publishing certificate to obtain similar protection. Regulation of broadcasting falls under the Radio and Television Act, which encompasses various aspects such as pay-TV and implements the 2018 EU audiovisual directive. This directive addresses matters including regulation of video recording platforms, child protection, promotion of European content, accessibility for individuals with disabilities, and guidelines regarding advertising.

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

Sweden: Media Pluralism Risk Areas



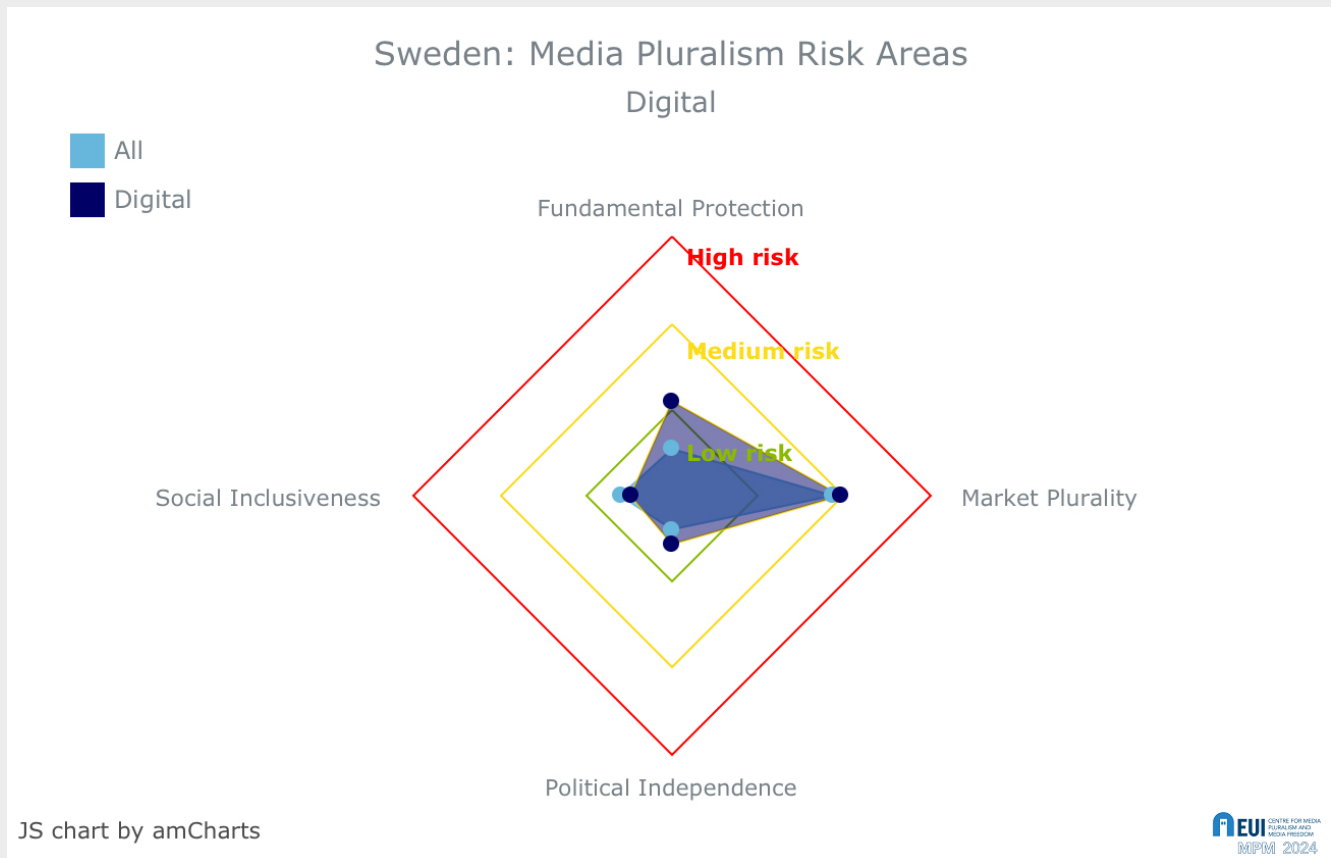
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CEVI CENTRE FOR MEDIA PLURALISM AND MEDIA FREEDOM
MPM 2024

The findings from the implementation of the 2024 Media Pluralism Monitor (MPM2024) in Sweden indicate a generally low risk for media pluralism within the country. Three key areas exhibit low risk levels: **Political Independence** (13%), **Fundamental Protection** (18%), and **Social Inclusiveness** (20%). However, one area poses a medium risk: **Market Plurality** (62%). The medium risk associated with Market plurality stems from market concentration, both among media providers and within digital markets, as well as insufficient editorial independence from commercial and ownership influences. Among the indicators, 75% (15) demonstrate low risk, 15% (3) demonstrate medium risk, and 10% (2) demonstrate high risk.

Overall, the results remain stable and have not undergone significant changes since the previous implementation in 2023. However, notable alterations include a positive shift towards **Editorial independence from commercial and ownership influence** (decreasing from 70% to 44%), and a negative trend in **Media viability**, where the risk level escalated from 14% to 38%, now falling within the medium risk category once again.

Focus on the digital environment

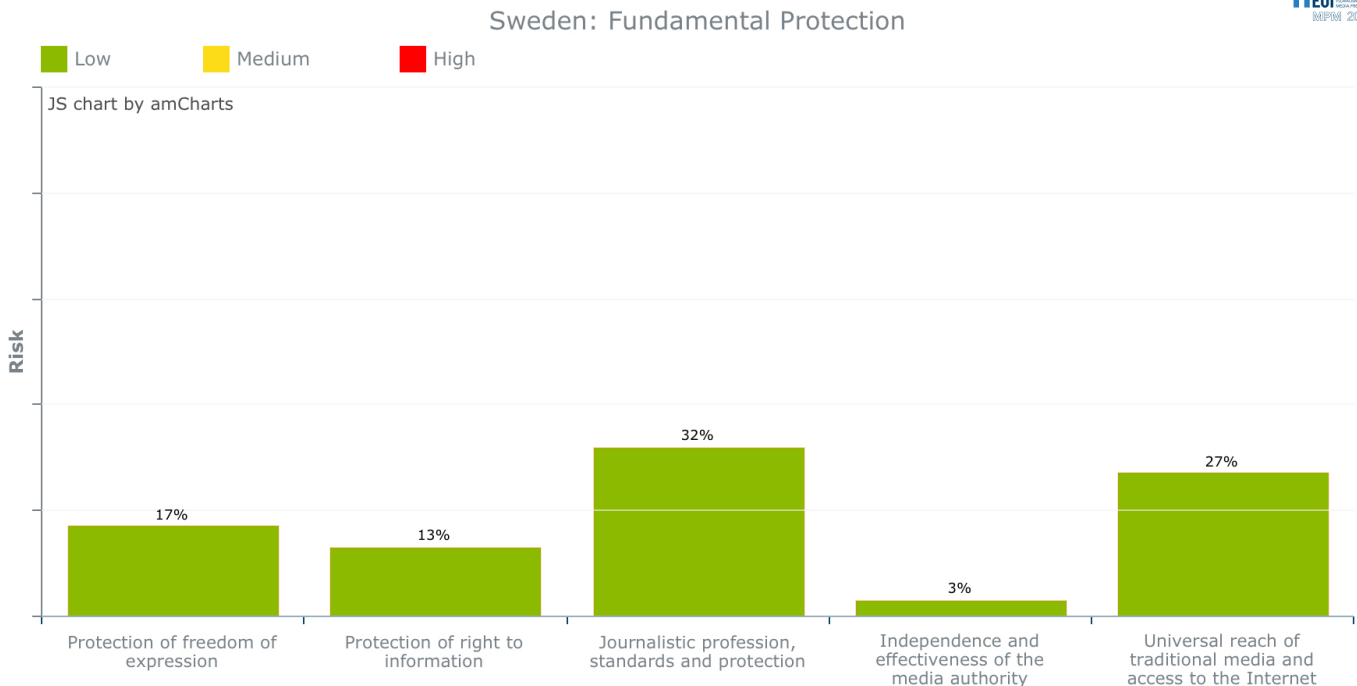


Two indicators focusing on the digital landscape exhibit either similar or heightened risks across all domains. The **Fundamental Protection** domain is linked with a medium risk, standing at 36%, while the **Political Independence** domain indicates a low risk at 19%. In the **Market Plurality** domain, there exists a slight disparity between the digital score (65%) and the overall score (62%). Conversely, in the **Social Inclusiveness** domain, the digital risk is comparatively lower, registering at 16%.

The persistent rise in risk within the **Fundamental protection** domain can largely be attributed to regulations put in place to counteract the spread of Russian propaganda within the European Union. The **Market plurality** domain exhibits minimal fluctuation, with only a 3 percentage point difference. As noted in the 2023 MPM implementation, this slight variance is due to the lack of regulations mandating the disclosure of ownership details, and of regulatory safeguards to prevent concentration of ownership, a situation applicable not only to the digital media sector. The marginally elevated score in the **Political independence** area within the digital environment is attributable to insufficient regulations and transparency concerning political actors' reporting of their expenditures and methodologies utilized on online platforms. Finally, in the **Social inclusiveness** area, the notable gap between the overall and digital scores observed in 2023 has diminished. This is primarily attributed to the allocation of resources towards developing a comprehensive strategy to counter disinformation, along with the establishment of mechanisms for reporting incidents of online hate speech. While this development holds promise for the future, its impact remains speculative, contingent upon the outcomes resulting from these investments in terms of enhancements.

3.1. Fundamental Protection (18% - 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 a low risk (18%) in the **Fundamental Protection** area, indicating a marginal 2% decrease in overall risk since the last MPM implementation. Upon closer examination of the sub-indicators, this is reaffirmed by relatively minor changes in risk levels.

The indicator assessing the **Protection of freedom of expression** scores 17% of risk, marking a nine percentage point improvement compared to the previous MPM implementation. As highlighted in MPM2022, the Swedish media system boasts a longstanding regulatory tradition promoting media freedom, anchored by two constitutional acts: 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 governing individual freedom of expression, these acts form the cornerstone of the Swedish media landscape. The reduction in risk level can be primarily attributed to the absence of observable violations of freedom of the press and expression resulting from the constitutional amendment criminalizing foreign espionage and the disclosure of classified information (pertaining to whistleblowers and investigative journalists). However, it is acknowledged that this assessment may evolve in future MPM implementations.

Sweden maintains a low risk score of 13% on the indicator assessing the **Protection of the right to information**, representing no change compared to MPM2023. Legal provisions safeguarding the right to information are clearly delineated in the Swedish constitution, as are the limitations based on privacy and confidentiality protection grounds. Furthermore, Sweden adheres to the European Convention for the Protection of Human Rights and Fundamental Freedoms (SFS, 1994:1219). Notably, the Swedish Parliament ratified a new law on September 29, 2021, to enforce the EU Directive on Whistleblowing (SFS, 2021: 890). This suggests that the newly enacted legislation has yielded the anticipated positive impact envisioned in the MPM2023 implementation.

The indicator addressing **Journalistic profession, standards, and protection** has reverted back to a low risk level compared to last year, scoring a 32% risk. Even though Swedish journalists practice their profession under relatively good working conditions compared to many journalists in other countries, they still risk being subjected to physical attacks or threats in various ways (Löfgren-Nilsson, 2019; Svensson & Björkenfeldt, 2021). However, in MPM2024 the risk level has decreased to low risk in this area. There are basically two reasons for this. One is that we have not had any examples of arbitrary arrests or imprisonments of Swedish journalists, and the other is that the Swedish government strengthened the criminal law protection for journalists on 1 August 2023 (SFS, 2023:494). This includes, among other things, that when assessing the seriousness of a crime, it should be considered aggravating when it is committed against a person because they, or someone close to them, are professionally engaged in journalism. Chapter 29, 2§: "Regarding aggravating circumstances in assessing the severity of the penalty, alongside what applies to each particular type of crime, special consideration should be given [...] if the crime is committed against a person because they or a close associate professionally engage in news dissemination or other journalism." (SFS, 2023:494).

The indicator assessing **Independence and effectiveness of the media authority** maintains an unchanged risk score of 3%. Sweden has implemented stringent regulatory measures to uphold the independence of the Swedish Press and Broadcasting Authority, mitigating the risk of undue influence from political and commercial interests (SFS, 2007:515; SFS, 2010:1062). As mentioned previously, a new media authority was established as of January 1, 2024. However, it is premature to ascertain whether this will result in deteriorations or improvements in practice.

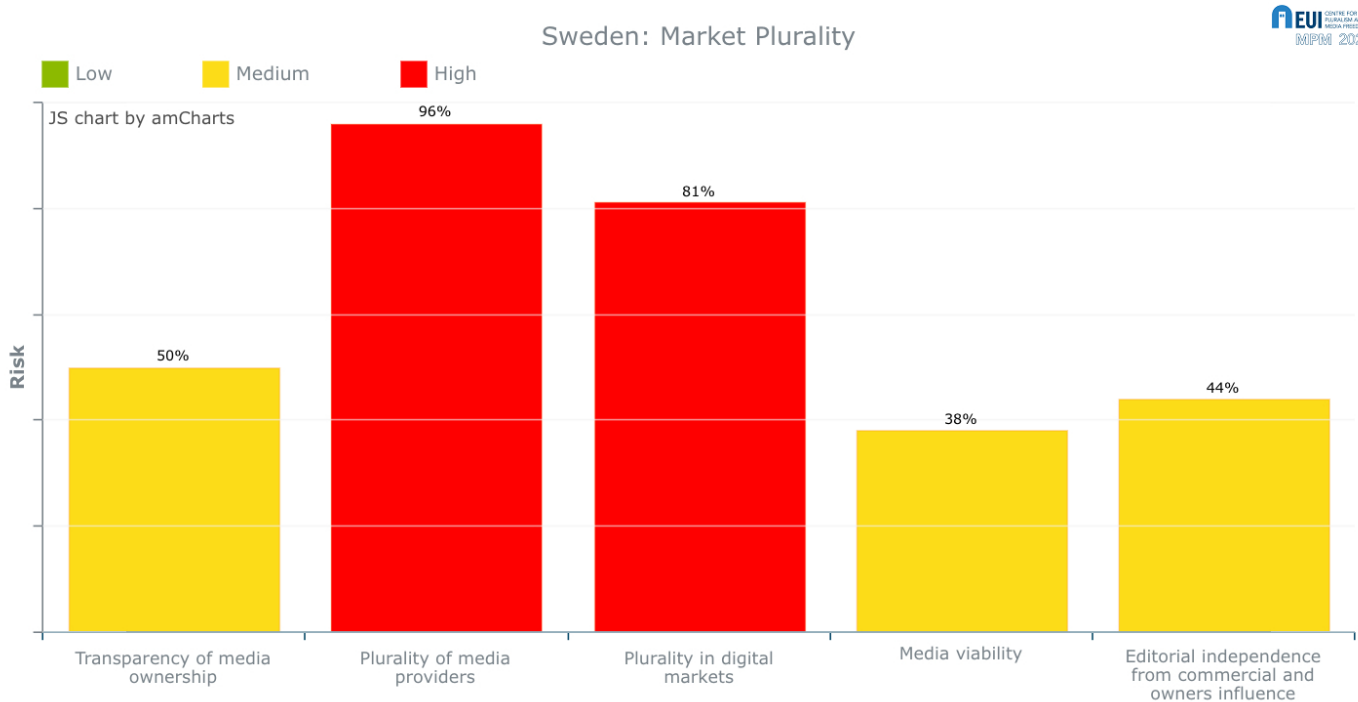
Lastly, Sweden demonstrates a low risk on the indicator for **Universal reach of traditional media and access to the Internet** (27%), reflecting a deterioration of 6% compared to the previous MPM2023. The comprehensive coverage of both public service media (PSM) and private media is regulated by broadcasting licenses, the Swedish Radio and Television Act (SFS, 2010:696), and the constitutional law on Freedom of Expression (SFS, 1991:1469). Supported by well-established infrastructure and affordable access to information and communication technologies (ICT), this framework ensures universal coverage of traditional media and internet access throughout Sweden.

Focus on the digital environment

Sweden maintains a low digital risk (36%) in the **Fundamental Protection area - digital**. While the risk level is estimated as low, it signifies a 2 percentage point deterioration compared to MPM2023 and a 8 percentage point deterioration compared to MPM2022. Sweden possesses a robust legal framework and a tradition of placing trust in its citizens to critically assess information from diverse media outlets. Concurrently, the EU regulation prohibiting the broadcast of Russian state-controlled media channels, *Russia Today* and *Sputnik*, within the EU, persists and has been expanded to include three more Russian channels (*Rossiya24*, *TV Center International*, and *RTR Planeta*). Another significant aspect deserving attention is the protection of online safety for journalists. As highlighted in MPM2023, the Swedish Parliament has enacted stricter legislation aimed at bolstering journalist protection. However, it takes time for the new legislation to be fully implemented, and there are instances where laws intended to enhance digital security inadvertently impede journalists in carrying out their duties. For instance, requirements for operators to retain data for law enforcement purposes compel them to store electronic communication data accessible to the police. Nevertheless, there is no guarantee that information safeguarded by a journalist's duty of confidentiality will not be stored and disclosed to law enforcement. While legal provisions exist to protect journalistic confidentiality under other coercive measures, there is no equivalent protection for data retention.

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 registers a medium risk (62%) in the **Market Plurality** area. The five indicators comprising this domain range between 38% and 96% risk. Specifically, Sweden's scores indicate a high risk on the indicators for **Plurality of media providers** (96%), **Plurality in digital markets** (81%), and a medium risk for **Editorial independence from commercial and owners influence** (44%).

The indicator focusing on **Transparency of media ownership** reveals a medium risk score of 50%. As noted in previous MPM implementations, this medium risk rating stems from the absence of specific regulations pertaining to transparency for media entities in Sweden. While all companies are obligated to adhere to general regulations delineated in the Swedish Law of Financial Relations, commonly referred to as the Transparency Act (SFS, 2005:590), which mandates transparency in ownership structures, and the Competition Act (SFS, 2008:579), which governs ownership concentration, these regulations only address the issue partially. Consequently, Swedish regulations may prove insufficient in ensuring full disclosure of media ownership to the public and to the authorities. However, there have been amendments to the Radio and Television Act in March 2023, aiming to enhance transparency by requiring the disclosure of additional information concerning media ownership structures for all audiovisual media and radio service providers.

In connection with this issue, Sweden ranks as high risk for the **Plurality of media providers** indicator (96%), as evidenced by the aforementioned concern. Because there has been no change from previous years, the high risk status persists. For the daily press, for example, ownership is concentrated in a few regional newspaper monopolies where one of the six newspaper groups controls all or almost all newspapers in the area. The concentration of news media in Sweden is governed by the Radio and

Television Act (SFS, 2010:696, chapter 4, sections 11 and 15, and chapter 13, sections 27-28) and broadcasting licenses, along with the overarching Competition Act. However, upon closer examination of the ownership criteria, it becomes evident that more needs to be done. As highlighted in previous MPM implementations, phrases such as "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** yields a high risk score (81%), remaining unchanged since MPM2023. As noted in previous MPM implementations, one of the primary challenges associated with this indicator is the limited availability of reliable data. Nevertheless, it is noteworthy that regulations concerning online platform concentration and cross-media ownership, as outlined in prior MPM implementations, do not solely target media companies in Sweden. The Swedish Competition Act (SFS, 2008:579) encompasses online and cross-media ownership concentration for all Swedish companies, without any sector-specific discrimination. However, we contend that the existing competition laws may not be fully equipped to address the challenges presented by the digital landscape.

Sweden records a medium risk on the indicator for **Media viability** (38%), marking a more than twofold increase in risk compared to the previous MPM implementation. As noted in (last year's) MPM2023, the risk score should be interpreted cautiously, as revenue trends for the Swedish media market in 2023 were not available at the time of writing - consequently, sector-specific revenue indicators were not factored into the risk assessment. For the MPM2024, we calculated the risk based on 2022 revenues (the latest available data) which shows that advertising investments continue to increase, while the growth does not benefit Swedish media, but mainly benefits global platforms, such as Facebook and Google, and advertising services, such as keyword advertising and online video. The digital era has ushered in new avenues for media financing and advertising investments. However, the downside is that these investments may not necessarily benefit Swedish media companies; instead, they often flow to global web companies and social media networks. Consequently, Swedish media outlets face revenue losses while contending with global players to retain their audience share.

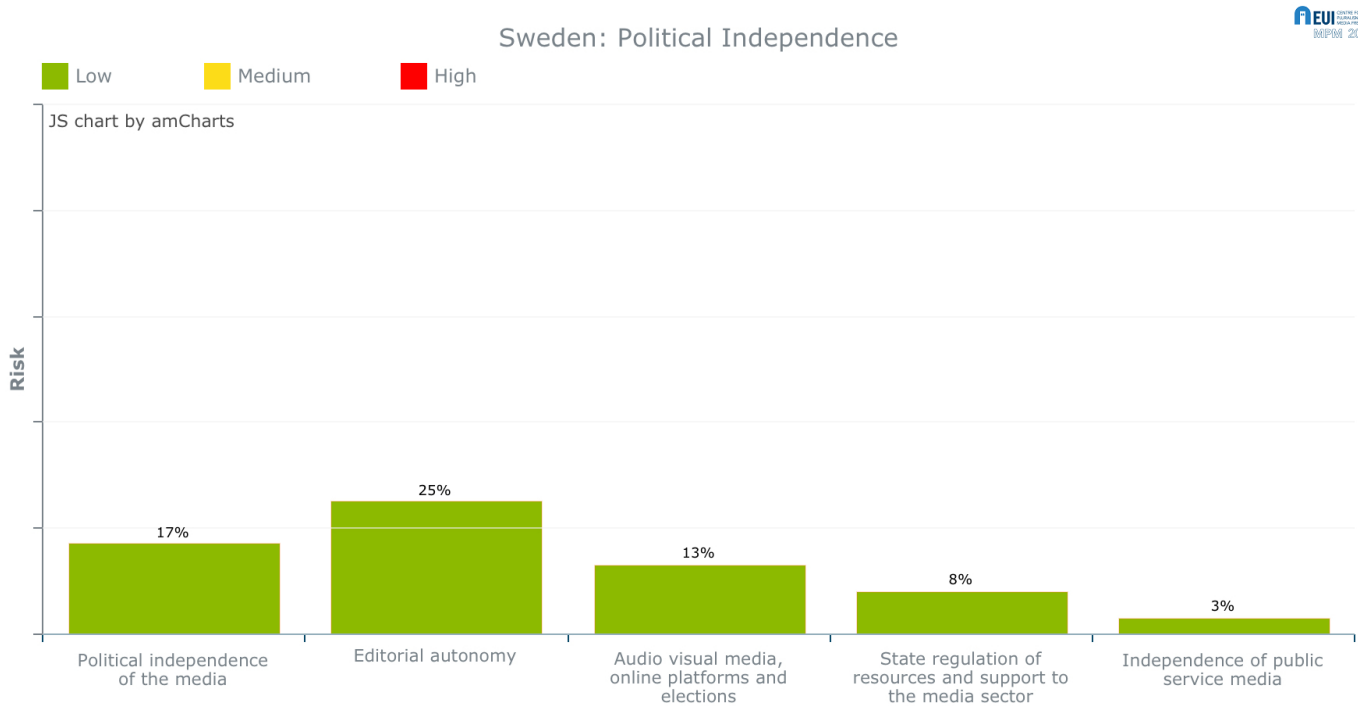
Finally, Sweden registers a medium risk on the indicator **Editorial independence from commercial and owner influence** (44%), representing a substantial decrease in risk since the previous MPM2023. Journalists and all members of the Swedish Union of Journalists (SJF) are obligated to adhere to professional rules aimed at preserving independence and impartiality. Breaches of these rules can be reported to the journalists' ethics committee within three months of the incident. However, as observed in previous MPM implementations, delineating the boundary between advertorials and editorial content remains a formidable challenge. This blurring of lines has the potential to undermine the credibility of media outlets, and it often proves difficult for Swedes to discern between the two.

Focus on the digital environment

The digital risk level for **Market Plurality** stands at 65%, slightly higher than the overall risk. This marks a 3-percentage point increase since MPM2023. Previously, two administrative authorities were tasked with enforcing ownership restrictions and addressing complaints in Sweden. The Swedish Media Authority primarily monitored media companies, while the Swedish Competition Authority oversaw all Swedish companies. However, despite the presence of these two authorities, there are currently no media-specific regulations prohibiting high levels of ownership concentration. Consequently, all companies, irrespective of sector, are subject to the same treatment. Moreover, there is little indication that the establishment of the new media authority will prompt any significant change in the "right direction."

3.3. Political Independence (13% - 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 records a low risk (13%) in **Political Independence**, marking a slight decrease in risk since the last MPM2023. The five indicators constituting this domain range between 3% and 25%, all falling within the low risk category.

The indicator assessing **Political independence of the media** maintains a low risk score (17%), remaining unchanged since the assessment in the last MPM implementation. Despite the low risk score, the risk primarily stems from the absence of regulation rather than actual wrongdoing. However, there have been no instances of conflicts of interest between media owners and ruling parties, partisan groups, or politicians to date.

The indicator assessing **Editorial autonomy** registers a medium risk (25%). While there are no common regulatory safeguards guaranteeing autonomy when appointing and dismissing editors-in-chief, numerous 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.

Sweden records a low risk on the indicator for **Audiovisual media, online platforms, and elections** (13%). The Media Election Survey, conducted during every parliamentary election in Sweden since 1979, suggests that both Public Service Media (PSM) and commercial media generally provide proportional and

unbiased representations (Beck-Friis & Lundqvist, 2022). However, there is a high risk associated with the rules governing political parties, candidates, and lists competing in elections, particularly concerning the transparent reporting of campaign spending on online platforms. There have been 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 underscores the necessity for specific regulations to ensure transparency regarding campaign spending and techniques employed in political campaigns online.

Sweden achieves a low risk score on the indicator for **State regulation of resources and support to the media sector** (8%). This area encompasses whether state advertising is distributed to media outlets in a fair and transparent manner. Certain criteria for State advertising are regulated in the Swedish Marketing Act (SFS, 2008:486). However, it is unclear whether they are fair. In terms of subsidies, the new media support came into effect on January 1, 2024. The primary aim of the new media support is to strengthen regional and local news journalism but must also be capable of supporting media diversity at the national level. Consequently, it is too early to make a fair assessment of the new media support and its consequences.

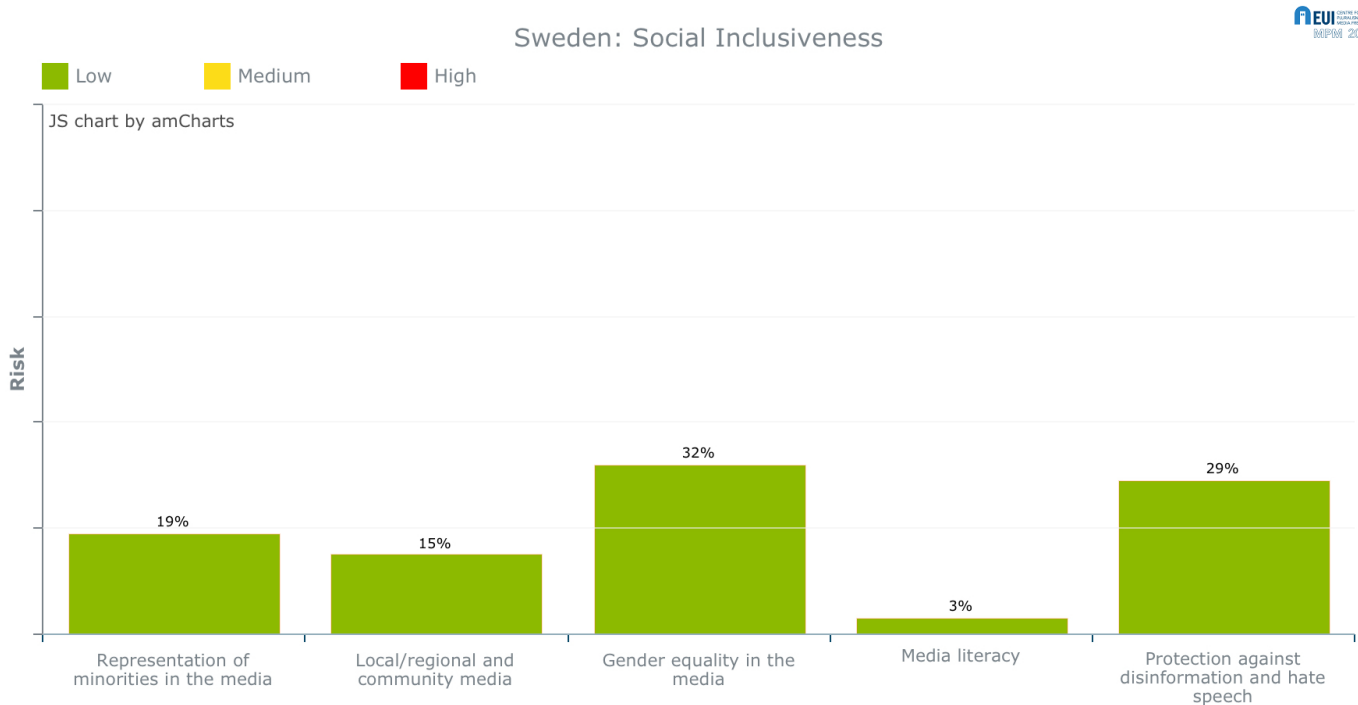
Finally, the indicator assessing the **Independence of public service media** maintains a low risk score (3%), remaining unchanged compared to the previous MPM2023. The Swedish Public Service Media (PSM) is regulated by broadcast licenses, ensuring their operations are independent from both economic 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 stands at 19%. Currently, there is no direct political control over digital native media in Sweden. However, as mentioned earlier, the absence of specific regulations concerning the transparency of campaign spending on online platforms for political parties, candidates, and lists participating in Swedish elections poses a significant risk. This regulatory gap also extends to transparency regarding the techniques employed in online political campaigns. While this does not necessarily imply political bias within news media, it underscores the potential risks in this domain. Therefore, there is an ongoing necessity for a more comprehensive approach to ensuring transparency regarding campaign spending and techniques used by political entities during online political campaigning. This could entail implementing guidelines or regulations mandating political entities to disclose their online campaign strategies and budgetary allocations, as well as providing transparency about the sources of funding for their campaigns. Additionally, it may be beneficial to offer training and educational resources to help media outlets and the general public better understand the role of digital media in politics and the potential associated risks.

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 maintains a low risk score (20%) in the **Social Inclusiveness** area, which remains unchanged compared to the previous year. The five indicators constituting this domain range between 3 and 29%.

Sweden maintains a low risk score on the indicator for **Representation of minorities in the media** (19%), which remains unchanged compared to the previous MPM2023. Swedish broadcasters are obligated to address the needs of physically challenged individuals as well as linguistic and ethnic minorities within the country. Social and cultural groups in Sweden have guaranteed access to airtime on Public Service Media (PSM) channels. Broadcasting licenses for Swedish PSM include provisions concerning airtime for the five minority languages: Sami, Finnish, Meänkieli, Romani Chib, and Yiddish. SVT, through agreements with SR and UR, broadcasts news in Finnish and Sámi, while SR airs news programs in Romani Chib and Meänkieli (SVT, 2023). The 2020-2025 charter/license for Swedish PSM explicitly mandates broadcasters to extend news coverage to an increased number of minority groups within the country.

The indicator for **Local/regional and community media** registers a low risk (15%), marking a slight decrease in risk compared to the previous MPM2023. In Sweden, the autonomy of community media encompasses both diversity in media content and media providers. The Swedish Public Service Media (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, ensuring accessibility for all. The Swedish government has recently implemented a new media support, which took effect on January 1, 2024. The main objective of this support is to enhance regional and local news journalism, potentially impacting upcoming MPM implementations.

Sweden achieves a low risk score on the indicator for **Gender equality in the media** (32%), marking a slight improvement compared to the previous MPM2023. The Swedish media sector operates under the Swedish law on equal rights (SFS, 2008:567). Broadcast licenses also include explicit requirements for program content to promote diversity and equality, which is interpreted as ensuring a balanced representation of women and men in practice. Moreover, the Public Service Media (PSM) has a comprehensive gender equality policy covering both personnel matters and programming content.

The indicator for **Media literacy** yields a low risk score in Sweden (3%), consistent with the low risk score recorded in the previous MPM2023. The Swedish Government has assigned the new media authority, the Swedish Agency for the Media, with the task of bolstering efforts to enhance media and information literacy (MIK) by fostering improved collaboration and activities in this domain. This mandate includes establishing a network for stakeholders involved in MIK-related matters, developing a platform for knowledge and information dissemination, monitoring advancements in the MIK field, and expanding the authority's MIK resources. Furthermore, the Swedish National Agency for Education has been assigned to develop a national digitization strategy for the school system spanning from 2023 to 2027. The strategy aims to improve digitalization opportunities, promote high levels of digital literacy, especially among children, students, and young individuals, and encourage the advancement of knowledge, equal opportunities, and access to technology.

Finally, Sweden receives a low risk score 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 highlighted in previous MPM implementations, it is crucial to recognize that addressing the issue of disinformation and hate speech requires consideration of the platforms used and the challenges associated with holding individuals accountable for their online actions. Although Swedish legislation permits providers to be held responsible in cases where the perpetrator behind disinformation and hate speech cannot be identified, this provision is still not consistently enforced.

Focus on the digital environment

Sweden records a low digital risk (16%) in the **Social Inclusiveness** area. In MPM2023, the emphasis of measuring digital risks within this domain shifted from protecting against illegal and harmful speech to safeguarding against disinformation and hate speech. This alteration significantly impacted the indicator compared to previous implementations (e.g., MPM2022). Nevertheless, maintaining consistency with the same measures for the second consecutive year has resulted in a stabilized risk level.

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 targeting the counteraction of disinformation. Instead, the country indirectly manages disinformation through broadcasting licenses and state-distributed media support, alongside initiatives to enhance media literacy among the population. Numerous collaborative efforts exist to combat disinformation, such as the partnership between the Psychological Defense Agency and Meta (owner of Facebook and Instagram) during last year's election campaign to mitigate the spread of disinformation and influence campaigns. Additionally, the Swedish media industry has initiated various fact-checking endeavors, some ongoing like Källkritikbyrå.se, and others occurring during specific events such as political debates and elections, like Faktiskt.se. However, despite these initiatives, the absence of specific laws or policies aimed at addressing disinformation in Sweden raises concerns, particularly amidst the escalating digital risks associated with disinformation. Therefore, Sweden needs to develop a more comprehensive approach to tackle disinformation and its societal impacts.

4. Conclusions

The data collected for the 2024 Media Pluralism Monitor in Sweden indicates a generally low risk for media pluralism in the country. However, there are specific areas that present a high risk, as well as others that were previously closely monitored but now seem to be trending positively in terms of media plurality, contrary to expectations.

In the area of **Fundamental Protection**, there are signs that fundamental values linked to media pluralism and freedom are under strain. This doesn't stem from explicit political hostility toward democratic principles but rather from a growingly uncertain security and political landscape, compounded by a war unfolding in Europe and Sweden's NATO membership. Consequently, freedoms and rights once considered secure are now in question. Yet, for Sweden, this represents more of a gradual decline, with the potential for further deterioration if left unattended.

One area that has warranted close scrutiny in previous MPM implementations is related to the legislative changes that directly or indirectly affect media and journalism. For example, the constitutional amendment criminalizing foreign espionage was expected to potentially encroach upon freedom of expression. However, in the MPM2024 assessment, we haven't observed this outcome. Conversely, the EU's regulation prohibiting the broadcasting of Russian state-controlled media channels Russia Today and Sputnik directly pertains to digital risks within the sphere of Fundamental Protection. Despite Sweden's robust legal framework and tradition of entrusting its citizens to discern information critically from diverse media sources, it remains crucial to uphold and safeguard this framework.

- The legislators must reinforce and maintain its legal framework that underpins media pluralism and freedom. This entails scrutinizing and revising any laws that impose constraints on freedom of expression. Additionally, it is vital to exercise vigilance against any potential erosion of fundamental freedoms and rights, while taking proactive measures to tackle emerging threats to the safety of journalists, media pluralism and freedom.

In the area of **Market Plurality**, Sweden faces a relatively high risk score due to the absence of specific regulations regarding media ownership. With the establishment of a new media authority, there is hope for positive changes in this regard. However, it is premature to make a detailed assessment at this stage. The current lack of pointed media ownership regulation impedes the diversity of media outlets and the representation of diverse voices and perspectives. Moreover, it is likely to result in ownership concentration, where a few large corporations or individuals wield significant control over the Swedish media landscape, potentially leading to biased reporting and a dearth of editorial independence. The risk stemming from the absence of transparency in media ownership has been underscored in multiple Media Pluralism Monitor implementations and poses a challenge that the Swedish Agency for the Media must address to safeguard the continued vibrancy and pluralism of the Swedish media landscape. Enacting clear and effective regulations for media ownership transparency could mitigate the concentration of media ownership and enhance the variety of media outlets, thereby fostering a robust and pluralistic media environment.

- The European Media Freedom Act outlines various obligations for member states, media entities, major platform companies, and other stakeholders involved in the media sector, with the objective of safeguarding the public's entitlement to access a range of independent and unrestricted media outlets. By adhering to the stipulations laid out in the act, Sweden can strive towards fostering a multifaceted and pluralistic media landscape conducive to the unrestricted exchange of information and ideas. Furthermore, endorsing the act would signify Sweden's dedication to preserving media freedom and safeguarding the public's access to a diverse array of media outlets.

The area of **Political Independence** remains the least risky aspect in Sweden. However, as highlighted in previous MPM2023 reports, there persists a notable absence of specific regulations concerning the transparency of campaign expenditures on online platforms for political parties, candidates, and lists participating in Swedish elections. Additionally, there's a lack of transparency regarding the methodologies employed in online political campaigns. While this regulatory gap doesn't necessarily suggest political bias within the news media, it does pose a potential risk to political independence. To address this concern, Sweden should establish clear regulations ensuring transparency in political campaign spending and online campaign techniques. Such measures would uphold the integrity of the political process and facilitate public access to accurate information essential for informed decision-making during elections.

The absence of transparency regarding campaign spending and strategies utilized by political parties, candidates, and lists during online political campaigning in Sweden underscores the necessity for a more holistic approach to safeguard political independence in the nation.

- In order to tackle this issue, it is imperative to establish guidelines or regulations mandating political entities to divulge their online campaign strategies and financial allocations. This should encompass transparency regarding the funding sources for their campaigns, thereby fostering a more equitable and impartial landscape for political reporting.

Sweden receives a low risk score across all sub-indicators in the **Social Inclusiveness** area. Concerns regarding the absence of regulations addressing disinformation, the initial component of the sub-indicator assessing **Protection against disinformation and hate speech**, seem to be addressed through more comprehensive regulation. The guidelines provided to the new Swedish media authority also emphasize investments aimed at enhancing media and information literacy among the populace. However, combating disinformation and hate speech is a complex challenge with no quick solutions.

- Sweden must continue evolving its strategy to combat disinformation and its societal impacts. This entails implementing more targeted regulations to counter disinformation effectively and ensure transparency, especially given the rising digital risks.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2024 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>Senior advisor</i>	<i>Sveriges Television (SVT)</i>

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