

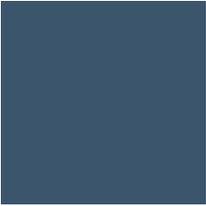


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Centre for Media Pluralism and Media Freedom

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Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2017 in the European Union, FYROM, Serbia & Turkey

Country Report: Finland

Author: Ville Manninen

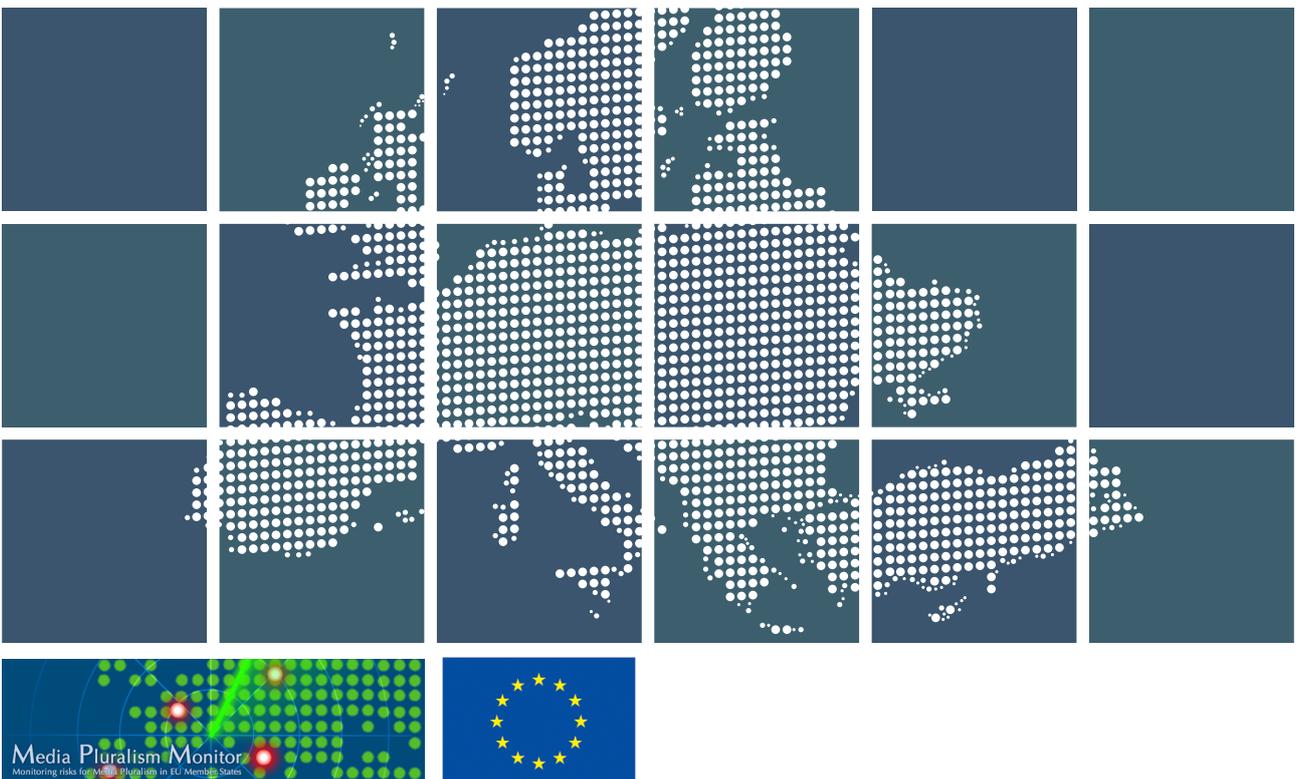




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1. ABOUT THE PROJECT

1.1 OVERVIEW OF THE PROJECT

The Media Pluralism Monitor (MPM) is a research tool that was designed to identify potential risks to media pluralism in the Member States of the European Union. This narrative report has been produced within the framework of the second EU-wide implementation of the MPM, carried out in 2017. The implementation was conducted in 28 EU Member States, Serbia, Former Yugoslav Republic of Macedonia (FYRoM) and Turkey with the support of a grant awarded by the European Union to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2 METHODOLOGICAL NOTE

The CMPF cooperated with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the cases of Malta and Italy where data collection was carried out centrally by the CMPF team. The research is based on a standardised questionnaire and apposite guidelines that were developed by the CMPF. The data collection was carried out between June and October 2017.

In Finland, the CMPF partnered with Ville Manninen, who conducted the data collection and annotated the variables in the questionnaire and interviewed relevant experts. The scores assessing the risks for media pluralism were provided by the CMPF and calculated according to the algorithm developed by the Centre itself. The national report was reviewed by CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts).

To gather the voices of multiple stakeholders, the Finnish team organized two stakeholder meetings, open meeting on 23.2.2018 at the University of Helsinki, and two closed sessions on 1.12.2017 at the University of Helsinki and at the Ministry of Transport and Communications. Summary of this meeting and more detailed explanations are given in the Annexe III.

Risks to media pluralism are examined in four main thematic areas, which are considered to capture the main areas of risk for media pluralism and media freedom: Basic Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Figure 1 below).

Basic Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political control over media outlets	Access to media for minorities
Protection of right to information	Media ownership concentration (horizontal)	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Cross-media concentration of ownership and competition enforcement	Media and democratic electoral process	Access to media for people with disabilities
Independence and effectiveness of the media authority	Commercial & owner influence over editorial content	State regulation of resources and support to media sector	Access to media for women
Universal reach of traditional media and access to the Internet	Media viability	Independence of PSM governance and funding	Media literacy



The results for each domain and indicator are presented on a scale from 0 to 100%. Scores between 0 and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk. On the level of indicators, scores of 0 were rated 3% and scores of 100 were rated 97% by default, to avoid an assessment of total absence or certainty of risk. For more information on MPM methodology, see the CMPF report “Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2016 in EU-28, Montenegro and Turkey”, <http://cadmus.eui.eu/handle/1814/46786>

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF or the EC, but represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, the MPM2017 scores may not be fully comparable with MPM2016 ones. For more details, see the CMPF report on MPM2017, soon available on <http://cmpf.eui.eu/media-pluralism-monitor/>

2. INTRODUCTION

Finland is a relatively large country (approx. 338 000 km²) with a small, largely urban, population (5.4 million). Notably, more than one-fifth of the population resides in the Helsinki metropolitan area, which has about 1.1 million residents.

Finland has two official languages, Finnish (88.3 per cent of the population) and Swedish (5.3 per cent). The law guarantees equal access to public services for speakers of both languages. In addition, the language of a small, native Sámi minority (0.036 per cent) enjoys some legal privileges. Other linguistic minorities do exist, the largest of which is Russian (1.4 per cent).

The population of Finland is relatively homogenous: 6.9 per cent of the population was born outside of Finland, and 6.4 per cent speaks as their primary language something other than Finnish, Swedish or Sámi.

Finland is among the world’s wealthiest nations. Its per capita GDP (39 236 euros in 2016) is slightly above the EU average. For years Finland was slowly recovering from the recession that began in 2008. It took until 2017 for the national economy to see significant growth. After the recovery, the political focus has begun shifting from resuscitating the economy to other topics, e.g. restructuring health and social services and local governance.

For decades the Finnish political field was dominated by a trio of old, large parties skirted by a handful of smaller ones. Today, some smaller parties are closing the gap to the old hegemons. The power balance was for a long time tilted centre-left in most election cycles. The balance has shifted towards the centre-right in recent years, and nationalist-populist tones have emerged. The ruling three-party coalition currently holds a slim majority of 106 seats in the 200-seat parliament, with six parties in opposition.

The traditional characteristics of Finnish media are subscription-based, regional news dailies and a strong public service broadcaster (Yleisradio, or Yle). A handful of companies dominate the private radio and television markets, yet in terms of audience shares Yle remains unparalleled. The newspaper market is less concentrated due to a long history of locally owned small-town papers cum regionals. There is, however, an ongoing trend of conglomeration as papers in financial trouble are being bought by their larger neighbours. Most media companies have expanded or are expanding their operations online, but with limited financial success. While Finns are avid internet users, few of them are willing to pay for content that is only digital – traditional print media, on the other hand, still has a wide readership. Some of the most popular Finnish news websites have been, and still are, completely free – including that of the public service broadcaster Yleisradio. Successfully introducing paywalled news content is thus a high hurdle.

Roughly half of television viewers have cable services and the other half has terrestrial broadcasts, while satellite dishes remain marginal. Most Finns have a broadband internet connection and use the internet daily. The audience’s media consumption is rapidly shifting online and online streaming services are becoming increasingly popular. The total value of the Finnish mass media market was in 2016 approximately € 3.8 billion.

Finnish media is largely unregulated in terms of content. Radio and television programme licences impose some conditions. Adherence to them is monitored by the Finnish Communications Regulatory Authority. No major changes to overall media regulation have been made in recent years. In 2017, the government enacted a legislative change which increased the national Parliament’s powers over the public service broadcaster Yleisradio.



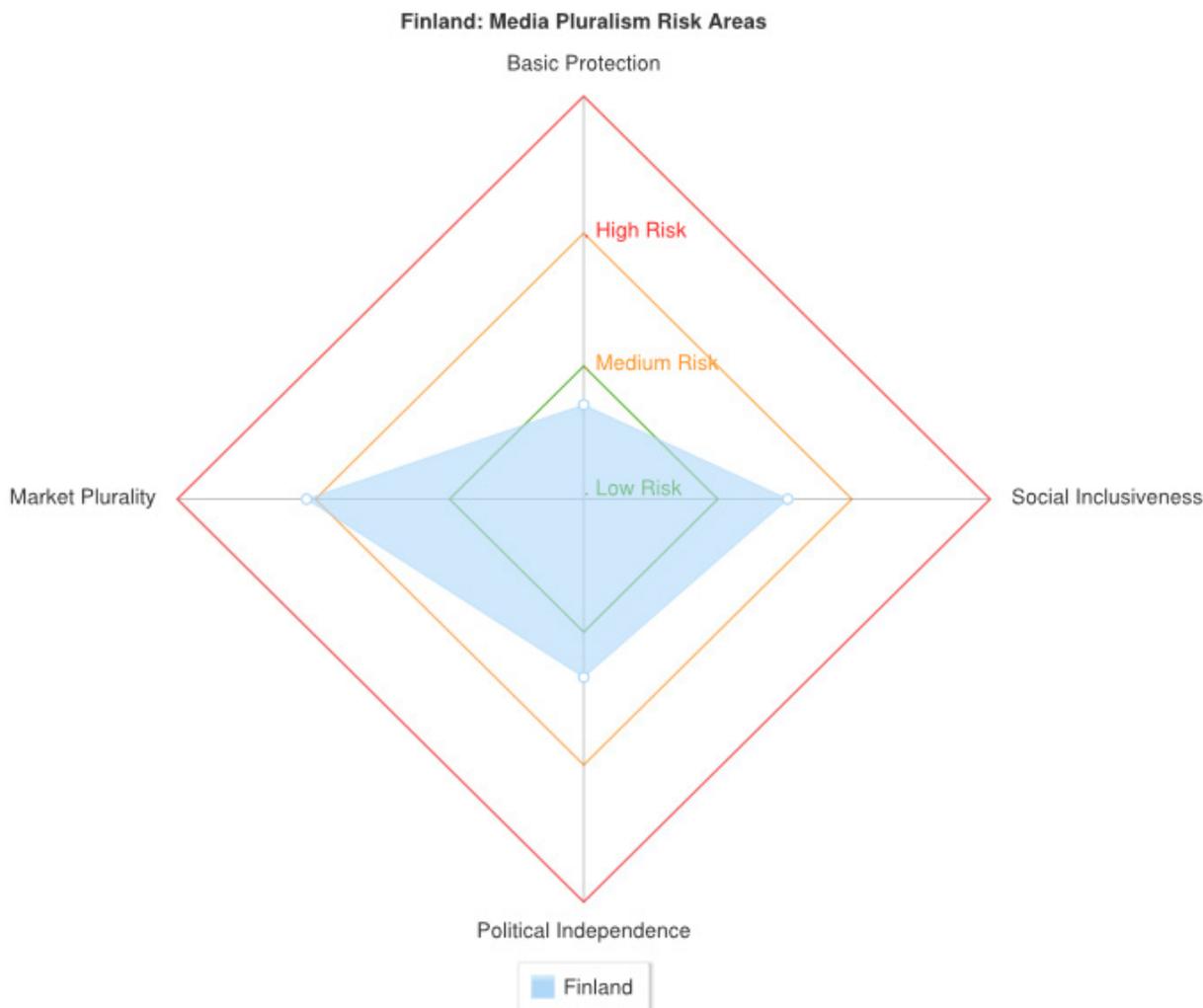
3. RESULTS FROM THE DATA COLLECTION: ASSESSMENT OF THE RISKS TO MEDIA PLURALISM

Finland scores a high risk level on one area (Market Plurality), medium risk on two (Social Inclusiveness and Political Independence) and low risk on one (Basic Protection). Few measurable developments took place within the Finnish media field between 2016 and 2017. As such, the risks levels presented below have the same root causes as in MPM 2016.

Most risk-increasing factors relate to the Finnish state's overarching policy of non-interference: few legal controls have been imposed on media businesses or on the content they offer. The policy may be problematic for minorities, whose effective access to media is limited without support. However, the majority of Finnish media does not seem to be adversely affected by the lax regulation.

Other issues relate to specific articles of legislation, harassment of and attacks against journalists, and the relationship between the public service media corporation and the government. Yet, overall the Finnish media is largely unburdened by external pressures. Instead, it has to grapple with endemic problems such as declining revenues, a small and saturated market, and under-representation of marginal audiences.

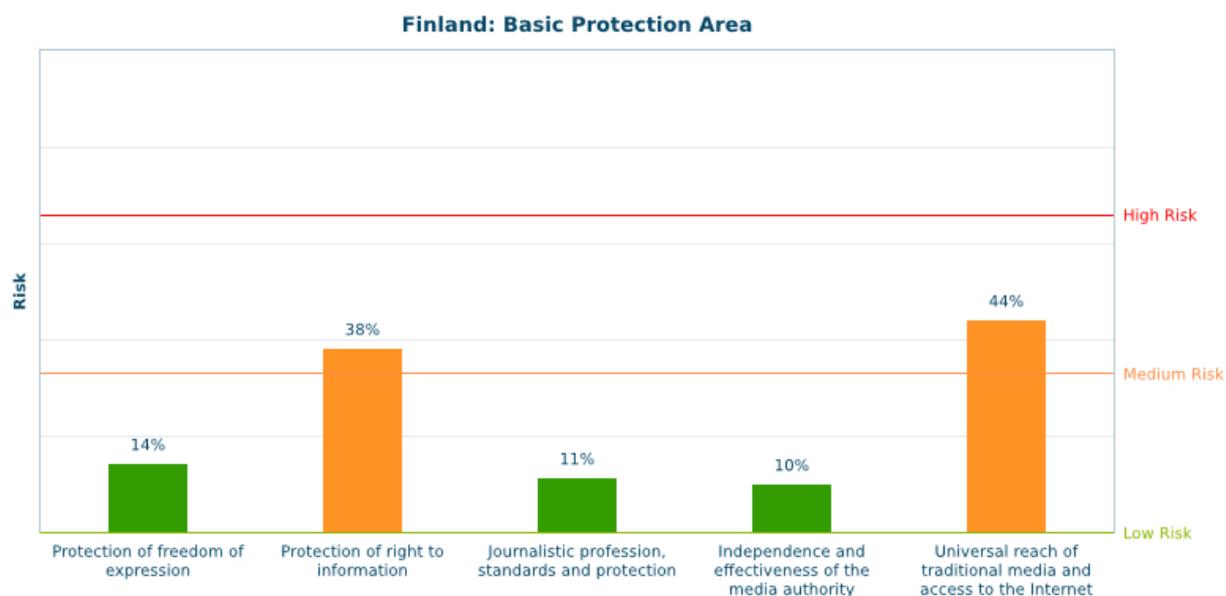
One-third of individual indicators reach a high risk level. They relate to media market concentration, PSM



independence, and access to media by marginal social groups. In many cases, research on the current situation and its social implications is not available. Therefore, it is unclear how harmful, or harmless, are the extant conditions.

3.1 BASIC PROTECTION (23% - LOW RISK)

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



The overall risk level of the Basic Protection area remained on the same, “low” risk range on which it was in 2016. However, individual indicators within the area have changed, with two indicators increasing their risk level and one reducing it. One indicator remained unchanged from 2016.

The indicator Protection of freedom of expression acquires a 14% risk score. The extant risks stem from the persistent criminalization of defamation and the potential of relatively harsh punishment. According to law, (aggravated) defamation is punishable by up to two years imprisonment, which is considered an excessive deterrent. Severe punishments, however, are used extremely rare, and aggravated defamation is usually punished by fines or parole. Otherwise freedom of expression is explicitly and extensively protected.

The indicator Protection of right to information acquires a 38% risk score. The risk level here consists of two factors. First, officials occasionally deny access to information, which by law should be freely accessible. Second, no legislation is in place to protect whistleblowers. On a positive note, the law does recognize and safeguard citizens’ rights to information.

Journalistic profession, standards and protection acquires a risk score of 11% - which is a slight increase from 2016’s score (8%). The rising risk level is caused by increasing harassment of journalists and the Union of Finnish Journalists’ inability to protect its membership from this influence. The increase is mostly in online threats and smear campaigns coming from anonymous members of the public, although traditional forms of harassment (e.g. threatening phone calls) also persist. A continuing risk-factor is the occasional violence against journalists. Otherwise, working conditions of Finnish journalists are permissive. Entry to the profession is unregulated, source confidentiality is effectively protected by law, journalists enjoy a living wage, and most have stable employment.

The indicator Independence and effectiveness of the media authority acquires a 10% risk score. Finland does not have a media authority per se, but the Finnish Communications Regulatory Authority (Ficora) is considered here to be a comparable institution. There are no known problems within Ficora’s limited remit. However a portion (approximately 35% in 2017) of Ficora’s budget is allocated annually through the state budget. The Monitor considers

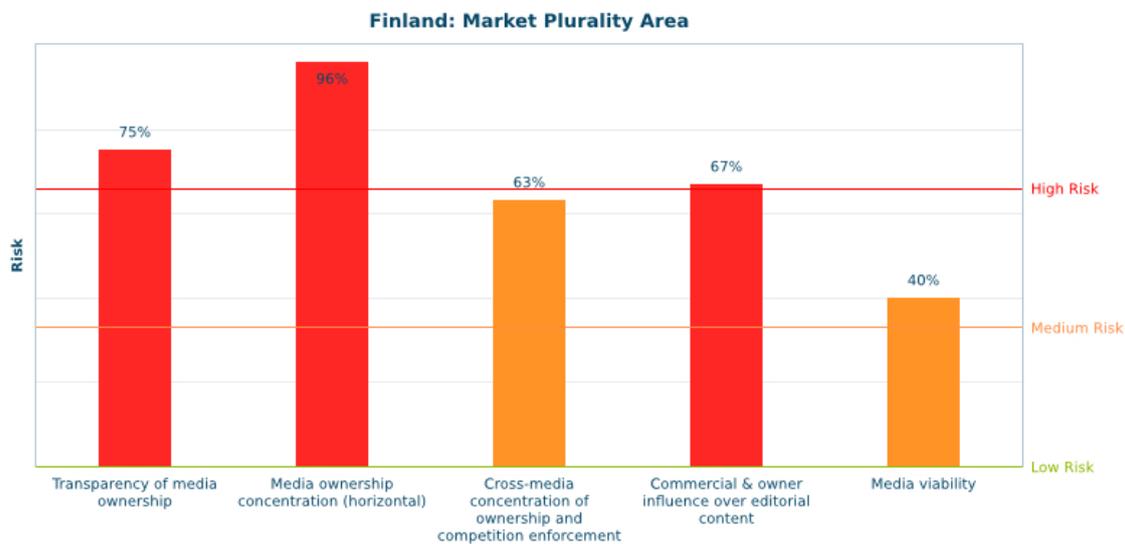


this discretionary power over a part of the authority's budget a potential threat to its independence.

Universal reach of traditional media and access to the Internet acquires a 44% risk score. The risk score consists of two factors. First, the internet service provider (ISP) market is highly concentrated: the four largest ISPs account for approximately 99 % of internet subscriptions. Second, high-speed internet connections (30 Mb/s or faster) are available to only 66.7% of the population.

3.2 MARKET PLURALITY (68% - HIGH RISK)

The Market Plurality indicators examine the existence and effectiveness of the implementation of transparency and disclosure provisions with regard to media ownership. In addition, they assess the existence and effectiveness of regulatory safeguards to prevent horizontal and cross-media concentration of ownership and the role of competition enforcement and State aid control in protecting media pluralism. Moreover, they seek to evaluate the viability of the media market under examination as well as whether and if so, to what extent commercial forces, including media owners and advertisers, influence editorial decision-making.



The Finnish media market is highly concentrated. This is in part due to the market's small size and lingual isolation. Both infrastructure and workforce expenses are high, so the market can support only a limited number of companies with modern production capabilities. Finland has a long tradition of numerous local and regional newspapers, which continue to survive in large numbers. However, an ongoing trend of conglomeration into large newspaper chains persists.

Within the Market Plurality area, risk levels have risen for two indicators, remained the same for one, and decreased slightly for one.

The indicator Transparency of media ownership acquires a 75 % risk score. The risk here stems from one root cause: the Finnish legislation does not set additional transparency requirements for media companies. This allows media owners to obfuscate their control by means of offshore holding companies if they so desire. Most media companies operating in Finland are by choice open about their ownership, but technically nothing prevents companies from hiding their true controllers even from the relevant authorities.

Horizontal ownership concentration acquires a 96% risk score. The high risk is due to the small number of companies that dominate each media sector. In the TV broadcasting sector, the four largest companies hold 92% of the audience and 77% of revenues; the four largest companies in the radio market hold 94% and 87%; and the four largest companies in the newspaper market hold 55% (audience) and 71% (revenue). There are no legal concentration limits specific to media industry, which the Monitor considers a risk-factor.

Cross-media concentration of ownership and competition enforcement acquires a 63% risk score, which is 4 percent points lower than in 2016 – and this time barely within the “medium” risk range. The change is due to the decrease in the combined market share of the four largest media companies. Still, said companies amass 65% of the



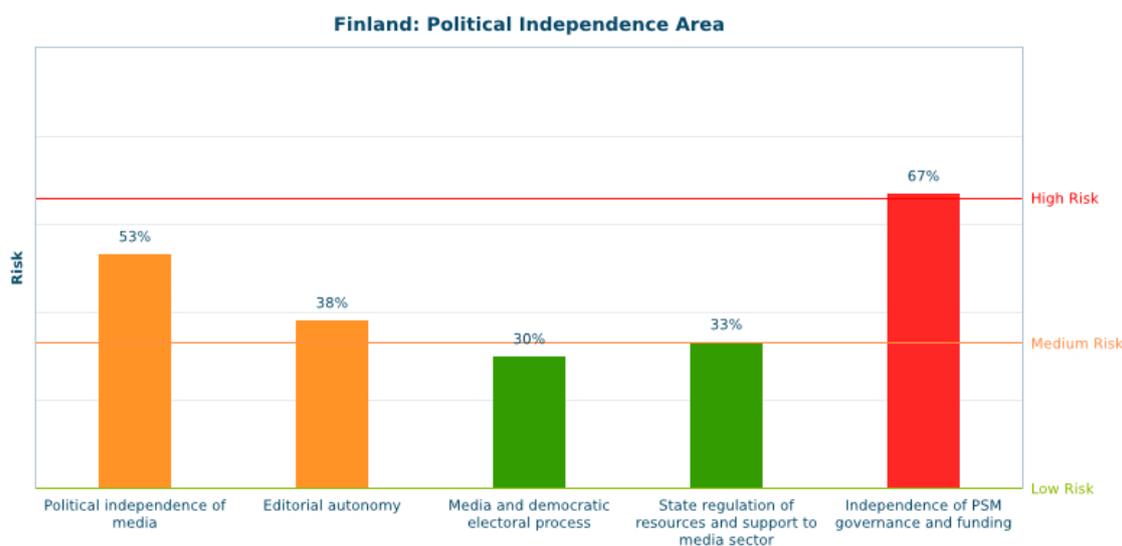
newspaper, television, radio, and online advertisement markets' revenues. Finnish law does not prohibit this level of concentration.

The indicator Commercial & owner influence over editorial content acquires a 67% high risk score. This type of influence rarely affects editorial content directly, but attempts are occasionally made. Small, local newspapers and certain lifestyle publications are more financially dependent on advertisers and they are more susceptible to commercial pressures. Independence is still highly valued by Finnish journalists and resisting outside pressures seen as a part of their work.

Media viability acquires a 40% risk score, which is notably higher than in 2016 (27%). The risk consists of several factors: First, revenues have declined or stagnated on several media sectors. Second, the Finnish state offers scant support to media, apart from funding the PSB and applying a lowered VAT rate to newspaper and magazine subscriptions. While some forms of direct subsidies exist, they are very limited in size and eligibility.

3.3 POLITICAL INDEPENDENCE (44% - MEDIUM RISK)

The Political Independence indicators assess the existence and effectiveness of regulatory safeguards against political bias and control over the media outlets, news agencies and distribution networks. They are also concerned with the existence and effectiveness of self-regulation in ensuring editorial independence. Moreover, they seek to evaluate the influence of the State (and, more generally, of political power) over the functioning of the media market and the independence of public service media.



The risk levels within the Political Independence area have gone through only minor changes. None of the indicators' risk ranges (low, medium or high) have changed from 2016. The risk level increased for one indicator (by 8 percent points), while all other indicators' changes were negligible.

The indicator Political control over the media outlets acquires a medium 53% risk score. The risk here is caused by the lack of legislation that would prohibit political or politicized control of media outlets. Despite this, most private media in Finland is politically independent. Most political parties do have some publishing activities, but the partisan media have practically no audience beyond the parties' own memberships.

The indicator on Editorial autonomy scores a medium 38% risk level. The risk here is caused by two factors. First, no law prohibits political influence in appointing editors – although there is no indication of a widespread issue. Second, there is evidence that political and commercial actors try and influence editorial decisions. Usually journalists are able to resist these pressures, but they admit to sometimes giving deferential treatment to, for example, important advertisers.



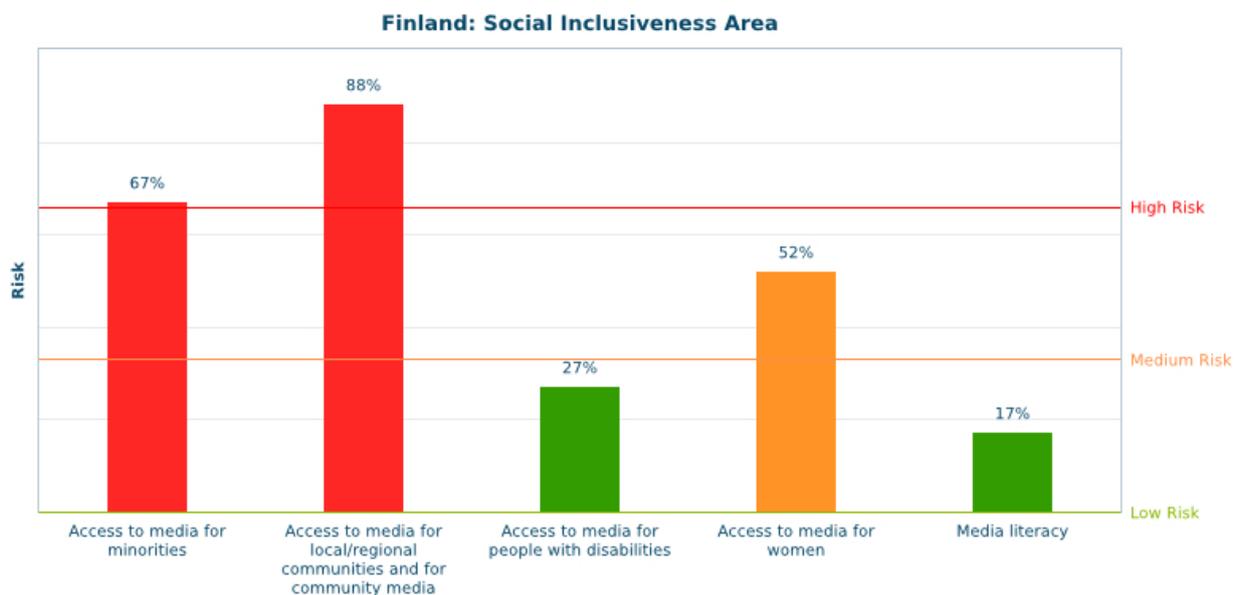
Media and democratic electoral process acquires a low 30% risk score. The extant risk is caused by lack of legislation that would compel media outlets (both private and public service) to treat all political parties equally and grant them access to media prior to elections. Despite the lack of regulation, there is little evidence of media treating parties unevenly. It should be noted, however, that no recent research on parties' media representations exists, and that some allegations of media bias have been raised.

State regulation of resources and support to the media sector has a 33% risk score. The risk level borders medium risk, and it comprises the state's scant financial support to media and the opaque way the few direct subsidies are distributed. The criteria according to which funding decisions are made are not public, and in part the funding is consistently and disproportionately awarded to particular applicants year after year.

The indicator on Independence of PSM governance and funding acquires a high 67% risk score. The risk consists of several factors. First, the PSM Yle is not legally insulated from political power: its highest governing body is appointed by, and from among the members of the Parliament. Furthermore, the Parliament recently increased the powers of this governing body. Second, political parties have a long history of influencing appointments of the PSM Director General. Efforts have been made to depoliticize the position, but even the most recent appointment has been accused of being political. The PSM corporation claims its editorial decisions are effectively insulated from political influence, but this claim has recently come under suspicion and heated public debate.

3.4 SOCIAL INCLUSIVENESS (50% - MEDIUM RISK)

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



The area of Social Inclusiveness has gone through the most dramatic changes between 2016 and 2017. One indicator rose from low to medium risk range, and one sunk from high to medium risk. Two other indicators increased their risk scores without leaving the low risk range.

Access to media for minorities has a high 67% risk score. The risk score stems from one, overarching theme: not all minorities have proportional access to airtime. This is likely due to the small size of most minorities in Finland: their purchasing powers are insufficient to support private niche media, and producing public service content for many, minute audience fragments would be very expensive.



The indicator Access to media for local/regional communities and for community media has a high 88% risk score. The issue here is the Finnish state's policy of non-interference: there are no protective legislation or subsidy schemes for regional, local or community media. Similarly, the PSM is not legally required to maintain regional bureaux or employ people from different regions (although Yle's strategic decisions have led to the same effect even without compulsion).

Access to media for people with disabilities indicates a 27% risk score. The current risk consists of four factors. First, representatives of the Finnish Federation of the Visually Impaired and the Federation of Hard of Hearing deemed the current accessibility policies as insufficient (yet they commend the development of recent years). Second, audio descriptions are not required from on-demand services (e.g. online streaming). Third, information on accessibility services is not easily available. Finally, the PSM does not systematically consult people with disabilities to improve their service. Still, legislation and regulatory action make notable efforts to facilitate access to media for people with disabilities, and extant policies are thoroughly implemented.

Access to media for women has a medium 52% risk score. The risk level here is elevated by several factors. First, the gender equality policy of the PSM corporation (while extant), has not reached its ultimate goals. Second, women are underrepresented as executives and board members on both private and public service broadcasters. Finally, data from the Global Media Monitoring Project shows that women are underrepresented as news subjects and sources in both traditional and online media. On a positive note, the regulatory framework in support of gender equality is comprehensive.

Indicator on Media literacy shows a 17% risk score. The risk is caused by partial implementation of the (otherwise extensive) media literacy policy, insufficient media literacy training given to teachers, and the neglect of marginalised groups in terms of media literacy initiatives. Regardless, the risk here is among the lowest of Finland's results: Finns have good digital literacy skills, and media literacy is widely integrated into both formal and non-formal education.



4. CONCLUSIONS

The Monitor identifies a number of risks for Finnish media. Most of them relate to potential threats rather than already-realized problems. Empirical research on many topics is lacking – making it difficult to assess how dangerous the risks truly are. Overall, Finnish media seem to be fairly healthy and pluralist, but certain issues still should be addressed.

- Basic Protection

The legal framework for free and pluralist media is strong in Finland. There are still blemishes, most notably the non-existent protection of whistleblowers and heavy punishments for defamation. The legislative branch should consider revising the legislation to meet international standards. Furthermore, all public officials should be trained to uniformly implement the freedom of information legislation.

- Market Plurality

The Finnish media market is highly concentrated. It is unclear, however, how many competitors the relatively small market could support. New anti-concentration measures are not advisable with current knowledge, but it is recommendable for the Finnish Competition and Consumer Authority to regularly monitor the situation. Before implementing any new regulation, an analysis should be conducted to determine the amount of competition the market is capable of supporting.

- Political Independence

Most Finnish media are politically independent, and the identified risks stem from lack of compelling legislation. New regulation should not be introduced as long as the desired outcome is reached without. Thus, Finnish media's political independence should be monitored and nascent issues tackled through self-regulation before legal intervention is required. Preferably, this monitoring should be conducted multilaterally between the media industry and academia.

- Social Inclusiveness

Finland has an extensive framework for promoting media access for various social groups. Small niche audiences are still persistently underserved. The public service broadcaster should strive to better engage neglected groups, and the Finnish state should consider improving the support schemes available to minority, local, and community media.



ANNEXE 1. COUNTRY TEAM

The Country team is composed of one or more national researchers that carried out the data collection and authored the country report.

First name	Last name	Position	Institution	MPM2017 CT Leader (please indicate with X)
Ville	Manninen	Researcher	University of Jyväskylä	X

ANNEXE 2. GROUP OF EXPERTS

No media consumers' organisation exists in Finland. Consumers are here represented by one of the five lay members of the Council for Mass Media. Other nine CMM members are representatives of the media industry.

First name	Last name	Position	Institution
Tapio	Nykänen	CMM member; Docent & Senior Lecturer (political science)	Council for Mass Media; University of Lapland
Reeta	Pöyhtäri	Researcher (media & minorities, journalism, public discourse)	University of Tampere
Petri	Makkonen	Deputy Director	Finnish Communications Regulatory Authority
Petra	Wikström-van Eemeren	Vice President of Public Affairs	The private broadcasting company MTV Oy
Mikko	Hoikka	CEO; Legal advisor	Finnish Periodical Publishers Association; Finnmedia
Kari	Karppinen	University lecturer, researcher (media policy)	University of Helsinki
Juha	Rekola	International Ombudsman	Union of Finnish Journalists



ANNEXE 3. SUMMARY OF STAKEHOLDERS MEETING

- Open session on 23.2.2018. and two closed sessions on 1.12.2017
- at the University of Helsinki and and at the Ministry of Transport and Communications
- Combined, the meetings were attended by:

Markus Mykkänen (University of Jyväskylä); Mikko Grönlund (University of Turku); Katja Lehtisaari, Janne Matikainen, Aino Koskenniemi, Juha Herkman and Kari Karppinen (University of Helsinki); Heikki Hellman, Marko Ala-Fossi, Paula Haara and Ilmari Hiltunen (University of Tampere); Tomi Lindholm, Mirka Meres-Wuori, Emil Asp and Kreetta Simola (Ministry of Transport and Communications); Petri Makkonen and Eliisa Reenpää (Finnish Communications Regulatory Authority); Laura Mäkelä (Ministry of Education and Culture); Yrsa Nyman (Ministry of Justice); Jukka Holmberg (Finnmedia); Jouko Jokinen and Kirsi-Marja Okkonen (Yleisradio Oy); Sirpa Kirjonen (Finnish Newspapers Association); Pertti Jokinen (Julkaisija); and Laura Pönkänen (The Finnish Society on Media Education).

- Key topics discussed

The results of the 2017 implementation of the Media Pluralism Monitor in Finland were presented and discussed at each session. The participants were also given the option to deliver additional comments in writing. Following is a summary of the critique presented by the participants, and it does not represent a consensus among those present.

One of the main points of criticism was the MPM instrument's underlying normative assumption of the necessity of compelling regulation. Finland is, on many accounts, lacking legislation or other regulatory mechanisms in support of media plurality – while still often achieving the desired results. Having Finland's risk levels increase for this seemingly innocuous reason was deemed misleading by several commenters. This criticism culminated in discussion over the independence of Finland's public service media company. According to the argument, the PSM corporation is independent in practice, even though its political independence is not enshrined in law.

Another normative assumption contested in these discussions relates to media ownership and concentration thereof. The questions here lie in whether media owners really have practical influence over media content, and whether ownership concentration should be always assumed detrimental. In Finland's small market area, concentration might be necessary to pool resources, it was argued.

Some participants also voiced their doubts over the results' comparability between countries. It should be noted, that data from other countries was neither presented nor discussed at the meetings – these comments thus referred to results from earlier years or simply stemmed from general reservations towards multi-national comparative research. In a related vein of critique, some proposed that certain definitions are –or can be– arbitrary, making the results difficult to comprehend without interrogating the data behind the risk scores. For example, reference was made to minorities, the definition of which is controversial: the associated risks scores are subject to change if a different definition is chosen.

The MPM instrument was found lacking on two accounts. First, according to several commenters, the battery of questions does not put sufficient weight on the role of multinational companies, especially technology and social media giants such as Google and Facebook. Second, in terms of media delivery systems' coverage, the instrument largely neglects print media. In Finland, hard copy subscriptions of newspapers and magazines are still common – the citizens' option (or lack thereof) to have that media delivered in a timely fashion to their mailbox is still an important consideration, it was pointed out.



- Conclusions

In conclusion, the MPM study received a fair amount of criticism. These comments, however, mostly dealt with quite specific issues stemming from the commenters' specific viewpoints. Besides these notes, two major concerns emerged: over whether the same normative assumptions should be applied to different countries and whether the methodology really permits cross-national comparison. None of the commenters discredited the project as a whole, although some expressed their worry over if and how the results will be used – for example in developing media policy.



