



## About 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 pilot test implementation of the MPM, which was carried out in 2015. The implementation was conducted in 19 EU Member States 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.

The Monitor’s methodology is based on research carried out by national country teams in the 19 countries, except for Malta 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. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly sensitive questions (see Annex I for the list of experts).

Risks to media pluralism are examined in four main thematic domains, 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. The Basic Protection domain consists of four indicators; Market Plurality has three, while Political Independence and Social Inclusiveness each contain six indicators.

<b>Basic Protection</b>	<b>Market Plurality</b>	<b>Political Independence</b>	<b>Social Inclusiveness</b>
Protection of freedom of expression	Transparency of media ownership	Political bias in the media	Access to media for different social and cultural groups, and local communities
Protection of right to information	Concentration of media ownership	Politicisation of control over media outlets	Availability of media platforms for community media
Journalistic profession, standards and protection	Concentration of cross-media ownership	Politicisation of control over media distribution networks	Access to media for the physically challenged people
Independence of national authority(ies)		State advertising	Centralisation of the media system
		Independence of PSM governance and funding	Universal coverage of the PSM and the Internet
		Independence of news agencies	Media literacy

The results for each domain and indicator are presented on a scale from negligible to 100%, a negligible risk being the lowest, and 100% risk being the highest score. Scores between negligible and 33% are considered low risk, 34 to 66% are medium risk, while those between 67 and 100% are high risk.

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**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.

## 1. Introduction

Finland has a strong tradition in print media. Newspapers and magazines are numerous and their readerships are high. The internet has a high level of penetration and many users. The public service broadcaster, YLE, is the key media player and has diverse production. All forms of media are open to private competition.

Media in Finland are free. State regulation mainly applies to technical aspects, such as transmission bandwidths. Criminal law imposes some restrictions on content, but they are in line with international standards.

The MPM instrument shows significant warning signs only due to the high level of market concentration. Minor issues relate to state regulation and policy implementation. The overall state of media pluralism in Finland should be considered good.

## 2. Results from the data collection: assessment of the risks to media pluralism

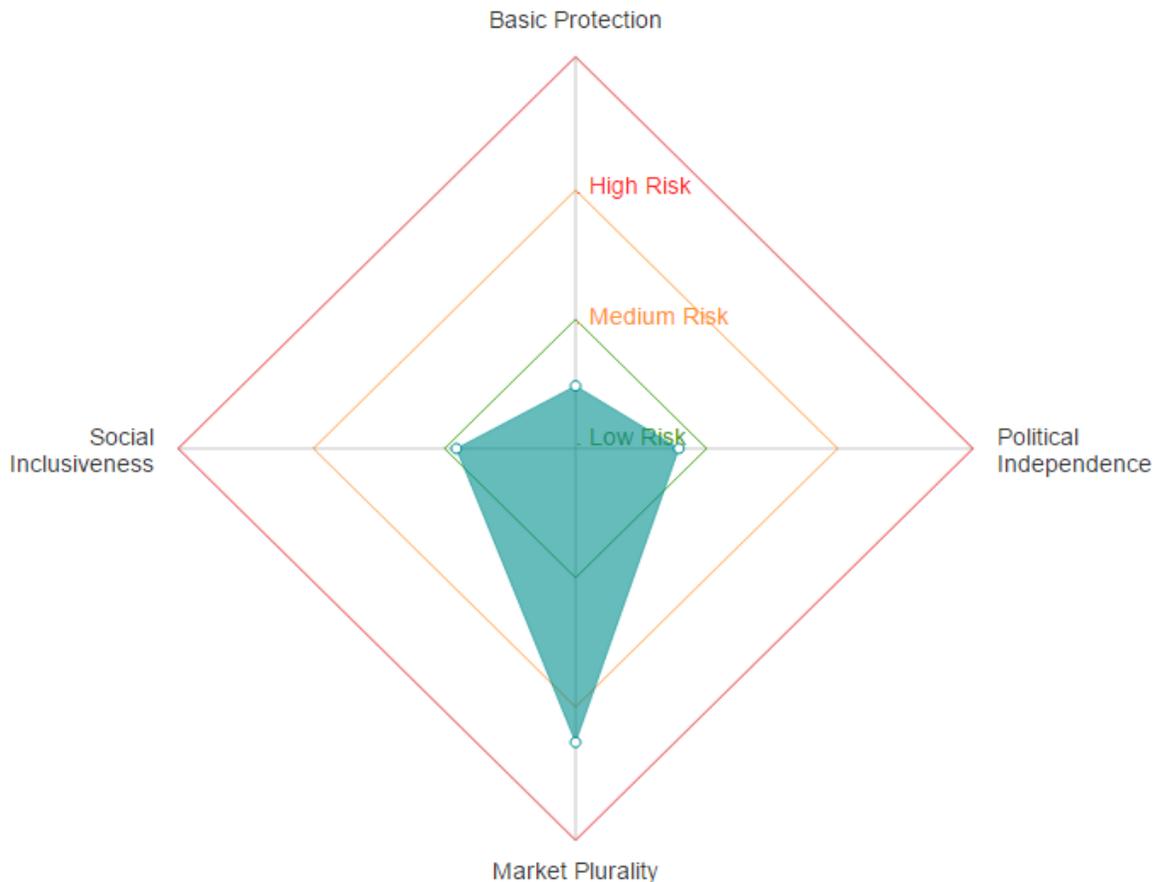


Figure 1 Media Pluralism Monitor 2015 - Finland, results by Risk Domain

## 2.1 Basic Protection (16% risk - low risk)

*The Basic Protection indicators represent the regulatory backbone of the media sector in every contemporary democracy and they measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for the freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; as well as the independence and effectiveness of the national regulatory bodies, namely, media authorities, competition authorities and communications authorities.*

<b>Indicator</b>	<b>Risk</b>
Protection of freedom of expression	20% risk (low)
Protection of right to information	31% risk (low)
Journalistic profession, standards and protection	8% risk (low)
Independence of national authority(ies)	5% risk (low)

Finland scores well in the ‘Basic Protection’ domain, with a composite risk level at 16%. None of the indicators reaches medium risk levels, but there are individual issues that blemish the country's record.

Firstly, there are issues that are related to long appeal processes over court decisions. The European Court of Human Rights has, on some occasions, overturned decisions upheld by all levels of Finland's judicial system. This suggests that remedies may become belated, which puts Finland at a medium risk in the related variable. This alone is sufficient to elevate the indicator ‘Protection for freedom and expression’ to 20% of risk.

The indicator ‘Protection of right to information’ has the highest risk score (31%) within the basic domain. The legal provisions to protect Finns' right to information are sophisticated, but there is some indication of their poor implementation. Namely, sometimes officials may withhold information that citizens should be able to access, and sometimes the repeal of these decisions may take unduly long, resulting in a medium risk in these variables.

The conditions that Finland’s journalists operate in are among the most favourable in the world. While access to the profession is unrestricted, the profession is well protected by shield laws, labour laws and union treaties. Signs of digital threats against journalists have not been detected, and, as a whole, working conditions are good. Notable blemishes are the occasional threats of violence made against journalists and attempts to influence editorial content. Two variables on these issues score as medium risks, which give Finland an 8% risk score in the indicator ‘Journalistic profession, standards and protection’.

Finland scores generally low in the indicator ‘Independence of national authority’<sup>1</sup>. It is noteworthy that

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<sup>1</sup> NB: It needs to be noted that this indicator has been found to be problematic in the 2015 implementation of the Media Pluralism Monitor. The indicator aimed to combine the risks to the independence and effectiveness of media

Finland does not have an all-round media authority. Negative evaluations come from the way that budgets are formed for the authorities of both telecommunications and for competition. In both cases, the authorities' budgets are not formed objectively, but at the Parliament's discretion. The budgets, however, have been consistent through the years, and, according to the authorities' own estimates, they have generally been sufficient. In total, Finland scores a 5% risk in this indicator.

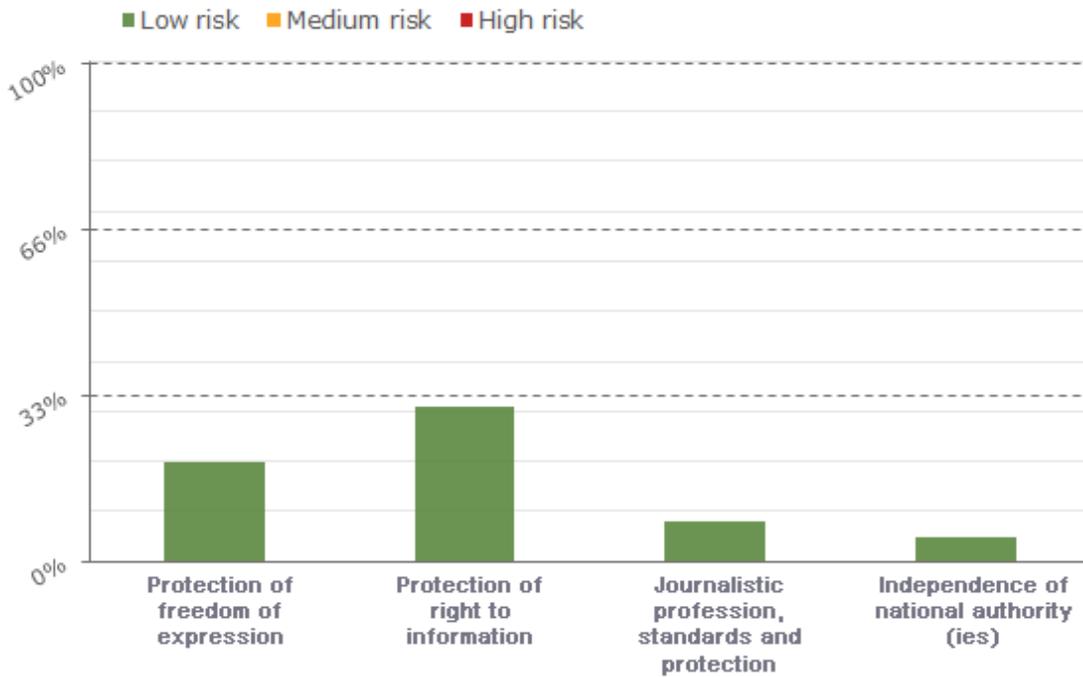


Figure 2 Media Pluralism Monitor 2015 - Finland, Basic Protection Domain, results by indicators

authorities, competition authorities and communication authorities, but it was found to produce unreliable findings. In particular, despite significant problems with regard to the independence and effectiveness of some of the authorities in many of the countries, the indicator failed to pick up on such risks and tended to produce an overall low level of risk for all countries. This indicator will be revised in future versions of the MPM (note by CMPF).

## 2.2 Market Plurality (75% risk - 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 regulatory safeguards against high concentration of media ownership and control in the different media, within a media market as well as cross-ownership concentration within the media sector.*

<b>Indicator</b>	<b>Risk</b>
Transparency of media ownership	38% risk (medium)
Concentration of media ownership	87% risk (high)
Concentration of cross-media ownership	100% risk (high)

Overall, ‘Market Plurality’ ranks Finland as being at high risk. The risk score (75%) is the highest among all of the domains.

The indicator ‘Transparency of media ownership’; produces a 38% risk score. Finnish law sets openness requirements to all limited liability companies, and aims to secure authorities' access to information. As a whole, the ownership of most of the media companies operating in Finland can be traced. Some co-owners are, however, unknown, and deliberate anonymity is possible due to loopholes in legislation.

Finnish media has been slowly concentrated into larger chains for decades. The process is still incomplete, but the lack of regulation that is specific to the media sector raises Finland's risk score to 87% in the indicator ‘Concentration in media ownership’.

Market shares (in percentage) controlled by the four largest companies in the different sectors are as follows: the internet (90%); audiovisual (90%); radio (79%), and newspapers (68%). Audience concentration among the top four providers is similar in the audio visual (92%) and radio (83%) sectors.

It should be noted that neither the Finnish Competition and Consumer Authority (FCCA), nor any other official body, routinely monitors market concentration in these sectors. The estimates are based on partially non-comparable data sets and should, at best, be considered approximate. Sufficient data on the newspaper sector's audience concentration, or on the online sector's market or audience concentrations, do not seem to exist.

The indicator ‘Concentration of cross-media ownership’ is the only one in the entire instrument that gives Finland a full 100% risk score. No *a priori* restrictions are placed on cross-media concentration, and the eight largest companies control as much as 98% of the country's media market.

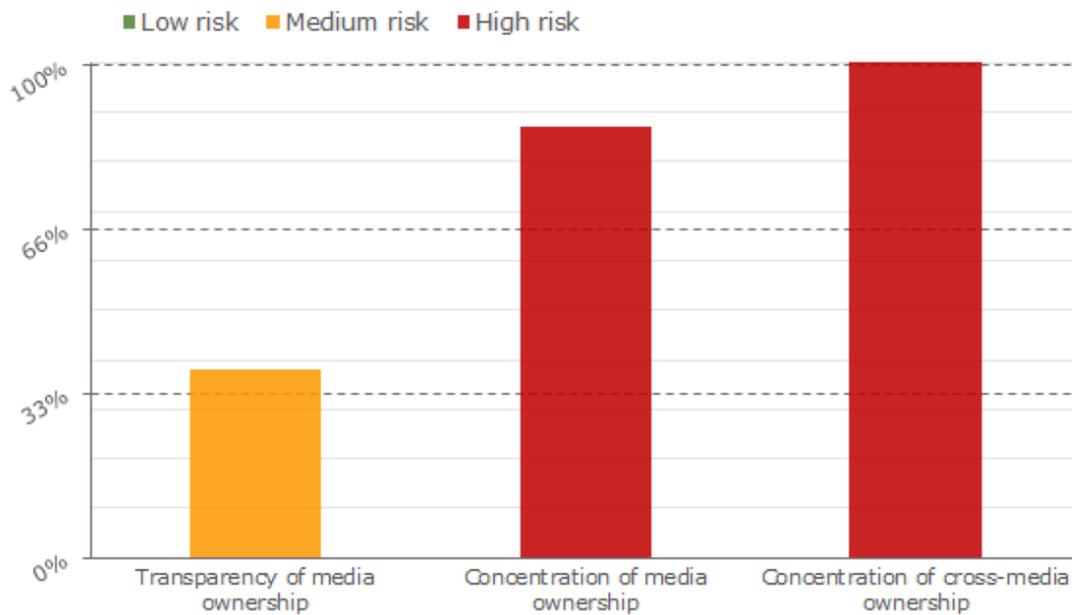


Figure 3 Media Pluralism Monitor 2015 - Finland, Market Plurality Domain, Results by Indicators

### 2.3 Political Independence (26% risk - low risk)

*The Political Independence indicators assess the existence and effectiveness of the implementation of regulatory safeguards against the biased representation of the political viewpoints in the media, and also the extent of the politicisation over media outlets, media distribution networks and news agencies. Moreover, it examines the influence of the state on the functioning of the media market, with a focus on state advertisement and public service media.*

Indicator	Risk
Political bias in the media	35% risk (medium)
Politicisation of control of media outlets	6% risk (low)
Politicisation of control of media distribution networks	Negligible
State advertising	50% risk (medium)
Independence of PSM governance and funding	25% risk (low)
Independence of news agencies	38% risk (medium)

The composite score for the ‘Political Independence’ domain puts Finland at the upper end of the low risk range (26%). Within the domain, scores range from a perfect zero to the mid-medium range. Most issues are related to the lack of regulation, rather than to actual malpractice.

The indicator ‘Political bias in the media’ puts Finland just barely within the medium risk range, with a score of 35%. Finnish law demands objective and balanced presentation in political matters from the PSB company (YLE). The corporation is overseen by its Administrative Council, which is elected by and from the national Parliament. The Council sets the rules for electoral coverage and nominates the board of governors, but it has no actual sanctioning powers in cases where there are violations. Ethical violations can also be taken up with the national self-regulatory commission, the Council for Mass Media.

There is nothing to suggest that YLE would be politically biased. Political actors are not explicitly guaranteed equal access to PSM platforms, but, in practice, access is granted to the relevant actors. Commercial channels generally abide by similar rules of non-partisanship, although no current research could be found on the topic. The expert panel was unanimous on these matters.

Finnish media outlets largely operate by commercial standards, and the indicator ‘Politicisation of control over media outlets’ produces a risk score of only 6% for Finland. At the time of this study, none of Finland’s free television channels appeared to have been in politicised ownership.

Reliable data on the politicisation of radio channels’ ownership could not be found. The data on the newspaper sector suggest 22% readership for papers owned by politically aligned entities. Politicisation is not actively monitored, and was, in this case, estimated through public information on the owners’ political activities.

Finland’s media distribution (print, television and radio) networks all appear to be in apolitical ownership, giving a score of a perfect zero (negligible risk) in the indicator ‘politicisation of control over media distribution networks;

The fourth indicator (‘State advertising’) scores the highest risk level (50%) within this domain. This is mainly due to the lack of both monitoring and regulations that are related to state advertising. The state is not a keen advertiser, but some public officials and state-owned companies post advertisements or announcements through private media. It is likely that these advertisements are not distributed according to audience shares, but according to the relevant audiences.

There is very little, if any, room for politically motivated subsidisation through advertising space purchases, both due to the practical nature and the relatively small size of publicly funded advertisement purchases.

The indicator ‘Independence of PSM governance and funding’ produces a risk score of 25%. The appointment procedures for the PSB corporation, YLE, are well defined in law. However, the procedure allows political oversight, as YLE’s Administrative Council is selected by, and is typically from, the members of the Parliament. This means that the highest positions within the corporation can be filled by political nominations. The government has no authority over YLE employees’ salaries. In theory, a parliamentary committee could divert funds that are meant for YLE, but, in practice, the corporation’s funding is clearly set in law. YLE is wholly funded by a specific tax that is collected from all citizens.

The sixth indicator (‘Independence of news agencies and news aggregators’) ranks Finland at medium risk (38%), due to the lack of market data. Only one generalist news agency operates in the country, STT-Lehtikuva. Timely data could not be found, but it is generally thought to hold the dominant market share. STT-Lehtikuva is privately owned and is considered apolitical in tone.

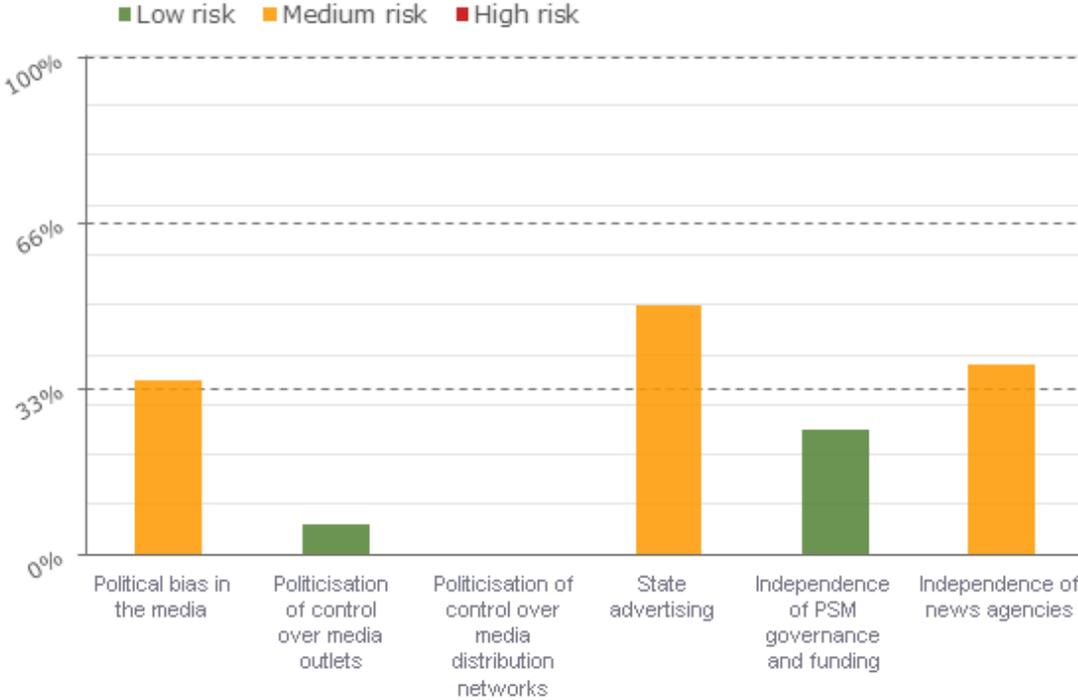


Figure 4 Media Pluralism Monitor 2015 - Finland, Political Independence Domain, Results by Indicators

## 2.4 Social Inclusiveness (30% risk - low risk)

*The Social Inclusiveness indicators are concerned with access to, and availability of, media for different, and particularly vulnerable, groups in the population. They assess regulatory and policy safeguards for access to media by various cultural and social groups, by local communities and by people with disabilities. Moreover, they assess the centralisation of the media system, and the quality of the country's media literacy policy, as well as the digital media skills of the population.*

<b>Indicator</b>	<b>Risk</b>
Access to media for different social and cultural groups, and local communities	44% risk (medium)
Availability of media platforms for community media	53% risk (medium)
Access to media for the physically challenged people	Negligible
Centralisation of the media system	75% risk (high)
Universal coverage of the PSM and the Internet	6% risk (low)
Media literacy	Negligible

Finland's composite score in the 'Social Inclusiveness' domain is just barely within the low range, at 30%. The results differ dramatically within the domain: while some indicators produce zero risk scores, others pass into the medium, or even into the high, risk range.

The indicator 'Access to media for different social and cultural groups, and local communities' puts Finland at a medium risk, with a score of 44%. The main issues relate to the PSB company, YLE's, vague regulation. The law does not guarantee minorities', cultural or social groups' access to airtime on PSB channels. Moreover, YLE is not bound by law to involve or hire people from certain backgrounds, nor to maintain a presence in all regions. Nevertheless, the desired effects seem to have been reached in practice: YLE routinely grants airtime to a heterogeneous selection of people. It regularly broadcasts news in at least five languages (sign language included). It also maintains local bureaux, which often employ and involve local people.

The indicator 'Availability of media platforms for community media' also produces a medium risk rating, with a score of 53%. The main reason for the high score is the state's policy of non-regulation, and the development of minority media is mainly left to the minorities themselves. Finland has only one minority that clearly passes the MPM threshold (of at least 1% of population), the Swedish speaking minority. It has done relatively well for itself, while smaller groups are under-represented in the media landscape. After revision, the risk to minority media's independence was decided to be low. The expert panel was divided on the matter. Finnish minority media are numerous, but they are financially feeble. Most of the minority media consist of magazines with low circulation and publishing rates. Only one, free television channel (from at least 21) in Finland is targeted at a minority audience. This proportion is slightly lower

than the minority's proportion of Finland's population. The situation is comparable in radio channels. In newspapers, the said minority is well represented. The two prior sub-indicators produce medium, and the latter low, risk assessments.

Indicator 'Access to the media for physically challenged people' grants Finland a perfect score of 0% risk (negligible). The country has well developed (and observed) policies and legislation to support physically challenged people's access to the media.

The domain's worst score (75%) comes from the indicator 'Centralisation of the media system'. Finnish legislation has no provisions to support or protect local media. Meagre subsidies are available, but none are reserved specifically for local media. Despite the lack of state support, local and regional newspapers thrive in Finland. The majority of daily newspapers (at least 67%) are regional. Regional radio channels gather approximately 27% of the daily listenership. Regional television channels do not exist.

The indicator 'Universal coverage of the PSM and the Internet' produces a near-perfect score of 6% risk. The PSB company, YLE, must, by law, provide services to all citizens. Television and radio broadcasts cover over 99% of the population. Broadband connections are available to 98% of Finland's rural population. *De facto* broadband penetration is equally high, at 90%. The only blemish comes from the sub-par, average broadband upload speed (14 Mb/s).

The indicator 'Media literacy' gives Finland a negligible zero risk estimate. The country has a well developed and implemented policy for promoting media literacy. The clear majority of Finns use the internet on a daily basis and have at least basic digital skills.

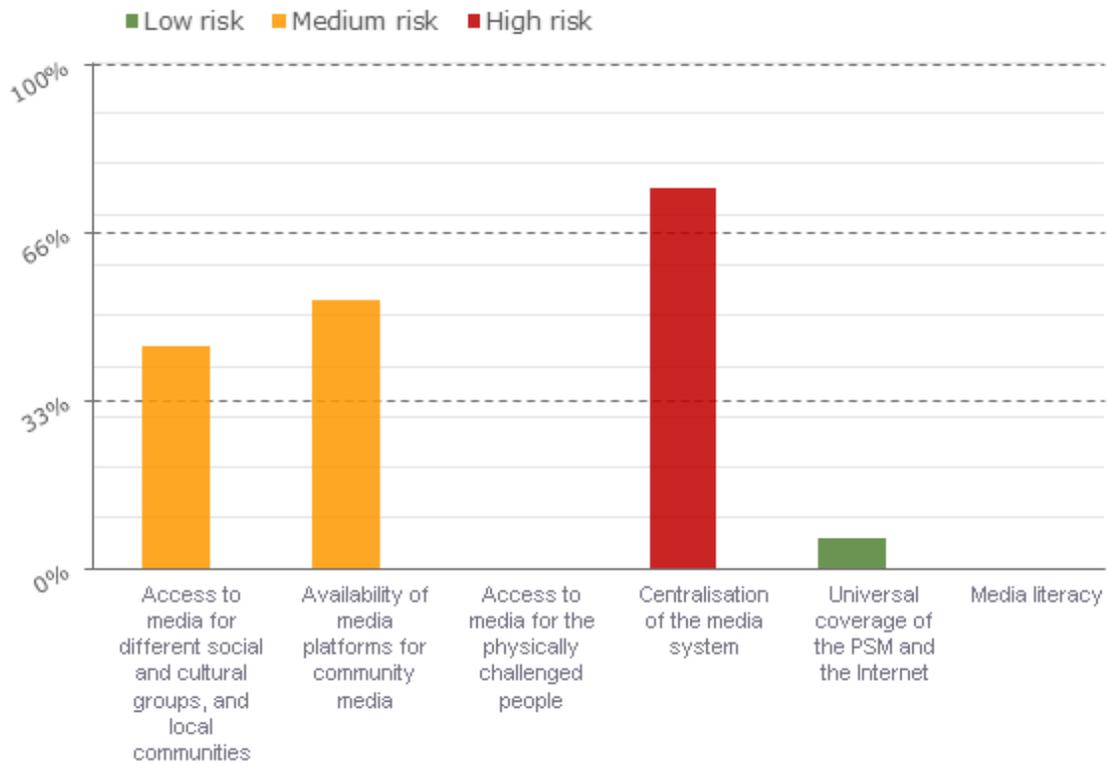


Figure 5 Media Pluralism Monitor 2015 - Finland, Social Inclusiveness Domain, Results by Indicators

### 3. Conclusions

*Based on the findings of the MPM2015, the following issues have been identified by the country team as being more pressing or as deserving particular attention by policy-makers in order to promote media pluralism and media freedom in the country.*

Finland's main issues relate to the 'market plurality' domain. The Finnish media system is highly concentrated, although much of this can be explained by the small market size. For this reason, stricter anti-concentration regulation cannot be recommended. The FCCA should, however, monitor more closely the market concentrations in all media sectors, as the lack of data proved to be problematic in this study. Policy recommendations that are salient to each media sector should not be made without pertinent data concerning profitability, expenses, and viable market shares.

The lack of state support, to either local or community media, or both, increases Finland's risk score in the indicator 'Centralisation of the media system' (the social inclusiveness domain). This result may be seen as being controversial, because local and regional media (the television sector is excluded) are fairly vital in Finland. However, the situation may be changing, as newspapers were recently deprived of a long-standing tax-cut, which had mainly benefitted the local papers. Calls have been made for the re-introduction of the tax cut, or for other subsidies in support of the local press. It is our opinion that, in such an event, support should be extended to all forms of local media.

While no signs of extensive violations of the right to information exist, we recommend that Finland pursues the harmonisation of policy implementation in this regard. While legal provisions are sufficiently supportive of institutions, individual officials may neglect to follow them. This occasionally results in unduly long appeal processes to gain access to information, and which may limit access from those less able to carry out the process.

Furthermore, we urge the state to continue its development and support of the public's media literacy, as well as the extensive coverage of PSM. As technology changes, both policy segments must continue to evolve. For example, as audiovisual content becomes more frequently transmitted through the internet, PSM coverage becomes tied to the availability of high-speed internet connections. Similarly, the condition of journalistic freedom, while currently good, should be actively monitored, and the violations thereof should be sternly counteracted. It appears likely that the issue will arise in the near future, as the internet provides more convenient and less traceable ways to influence (and harass) journalists.

## Annexe I. List of national experts who were consulted

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