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A light blue, hand-drawn style outline of the map of Finland, including its islands, serves as a background for the title text.

MEDIA CAPTURE MONITORING REPORT: FINLAND

**MEASURING COMPLIANCE
WITH THE EUROPEAN
MEDIA FREEDOM ACT**

JANUARY 2025

MEDIA CAPTURE MONITORING REPORT: FINLAND

The International Press Institute and the Media and Journalism Research Center have partnered up to produce the Media Capture Monitoring Report, an annual report to measure media capture in Europe and the degree to which Member States meet new EU regulation to combat the problem.

In May 2024 the European Media Freedom Act (EMFA) came into force and Member States are required to enact reforms to align with the new regulation.

The reports focus on the EMFA elements directly addressing media capture, namely, the independence of public service media and of media regulators, the misuse of state funds to influence media, and ensuring ownership transparency and media pluralism.

The reports examine the standards prescribed by law and how they are currently implemented in practice. They set out the areas of reform needed to bring each country into line with EMFA while also making recommendations for where reform can go further.

The reports are an important tool for media rights groups and national policy makers to guide reform and monitor the degree to which Member States are meeting their obligations.

For the first year a group of seven EU Member States have been selected for the pilot studies including Bulgaria, Finland, Greece, Hungary, Romania, Poland and Slovakia.

The project is a part of the Media Freedom Rapid Response, a Europe-wide mechanism which tracks, monitors and responds to violations of press and media freedom in EU Member States and Candidate Countries. The project is co-funded by the European Commission.

Authors: Minna Horowitz (Fellow at the Media and Journalism Research Center and researcher at the University of Helsinki, Faculty of Social Sciences), Astrid Söderström (research assistant at the University of Helsinki), with Riku Neuvonen (researcher at the University of Helsinki, Faculty of Law).

Editing: Marius Dragomir (MJRC), Zsuzsa Detreköi (MJRC), Oliver Money-Kyrle (IPI)

Design and layout: Beatrice Chioccioli (IPI)

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Context: Finland as a media welfare state

Due to its robust track record in media, communication, and democracy, Finland is often classified as a “media welfare state” where communication services are traditionally regarded as public goods and editorial independence is encouraged. Other features of the media welfare state model include cultural policies for media pluralism and consensual solutions between stakeholders. These principles have been present despite the relatively small media market for the Finnish language and even smaller for the country's minority languages. Over the past decades, the challenges brought by global platforms, in addition to socio-political challenges and growing income and cultural inequalities in Finnish society, have impacted the realisation of this model.¹

The implementation of the European Media Freedom Act (EMFA) presents Finland with a number of significant challenges, particularly in redefining the role of public service media in the context of the “late-digital era” and addressing the impact of media concentration on media pluralism and diversity in Finland’s small media market. In general, there has been a paucity of debates surrounding EMFA until the autumn of 2024. However, recent developments around the public media appear to be at odds with the core objective of the EMFA.

In Finland, EMFA requires that the national regulatory framework be capable of assessing the impact of mergers and acquisitions in the media sector on media diversity. Going forward, in addition to controlling mergers, their impact on media diversity and independence must be assessed, particularly in cases where the merger involves a company providing media services or a platform offering access to media content.

It is also necessary to define the supervision of certain obligations under the regulation and the powers required for such supervision at the national level.

Furthermore, the regulation mandates the enactment of national legislation governing the procedures and criteria for the appointment and dismissal of executives of public broadcasting companies. This will be incorporated into the ongoing legislative initiative to amend the act that governs the public service media, Yleisradio (Yle). The drafting of supplementary legislation to the Media Freedom Act commenced in October 2024.

Some stakeholders believe that Finland’s robust and free media landscape renders the EMFA somewhat unnecessary and vague, suggesting that it will have minimal impact on the vitality of the national media market; or that additional regulation might, if poorly implemented, lead to a situation where new legislation would give

¹See, e.g., Sirkkunen, Esa et al. (2021). [Media Platformisation and Finland: How platforms have impacted on the Finnish mediasphere and public life](#). Tampere University, [Erillisteokset ja sarjajulkaisut](#) [1128]

the state and authorities greater opportunities to intervene in media content.²

However, some key stakeholders maintain that EU legislation targeting media freedom is an important democratic and value-based message. The EMFA is regarded as an effective tool for maintaining the independence and financial stability of public service media from political influence and disruption, as well as providing additional protections for editorial freedom and media pluralism.³

The success of EMFA depends on its implementation. Moreover, the assessment of media concentration requires a nuanced approach that may vary depending on the national or regional context.

Independence of media regulators

In Finland, the responsibility for media policies falls mainly under two ministries: the Ministry of Transport and Communications and the respective regulatory authority, independent regulator Traficom, which oversees market and industrial policy-related issues, and the Ministry of Education and Culture, and the respective regulatory authority, the National Audiovisual Institute (KAVI), which addresses content-related matters.

The regulatory authorities comply with the EU's Audiovisual Media Services Directive (AVMSD). The Ministry of Transport and Communications is responsible for the national implementation of EMFA.

The process of incorporating EMFA into national legislation commenced in the autumn of 2024 when the Ministry of Transport and Communications launched the project⁴ in consultation with key stakeholders. The government's intention is to submit the proposal to Parliament in spring 2025. A public consultation will be held throughout the preparation process. Such consultations are conducted via an open e-government platform, which is accessible to any individual or organisation. This approach will also be adopted for EMFA, as evidenced by the consultation on the implementation of DSA.⁵ To date, this has yet to result in the designation of a national regulatory authority for EMFA. It is possible that one or more existing regulatory authorities will be assigned responsibility for implementing the Act, for example as part of a division of labour between Traficom and the Competition and

²See (in Finnish) Pöyhtäri, Reetta (2024 in print). News media and the new information environment (Uutismedia and uusi viestintäympäristö). In Sirkkunen, E. & Neuvonen, R. Media in the Age of Platforms. (Media alustojen ajassa). Gaudeamus.

³This report has been informed by four background interviews with industry and policy-making experts, as well as insights from two independent experts on various aspects of EMFA.

⁴See (in Finnish): [Legislative project: Preparation of legislation to complement the EU's Media Freedom Act begins](#); also, [Government proposal for legislation to complement the European Media Freedom Act](#).

⁵See [here](#) (in Finnish).

Consumer Authority (FCCA).⁶

- Legislation in line with EMFA provisions: **Yes**
- Effective independence of current regulators: **Yes**

Independence of public service media

The Finnish Broadcasting Company (Yle), which is a public service media entity, has been operating with a degree of independence, despite facing a multitude of pressures from commercial and political sources for an extended period of time.

The current right-wing government established a parliamentary working group with the objective of reviewing the remit and funding of Yle that started in autumn 2023. After months of deliberations, the parliamentary committee reached a consensus in September 2024, proposing that the index which determines the annual increase in Yle's funding be frozen for a period of three years, from 2025 to 2027. The proposal would require an amendment to the Act on the State Television and Radio Fund, which is the legislation that governs Yle's funding.⁷

Yle has announced organisational changes, resulting in a reduction in the size of its Management Group and the merger of certain departments and units as a way to save costs.⁸ Furthermore, the Ministry of Transport and Communications has initiated a new process to amend the Yle Act⁹, with the stated objective of "increasing the openness" of its operations. This includes the criteria and procedures governing the selection and dismissal of executives.¹⁰ Meanwhile, commercial media, which face significant sustainability challenges, have also been questioning Yle's role putting more pressure on the broadcaster to reduce its services.¹¹

- Legislation in line with EMFA provisions: **Partially**
- Effective independence: **Yes, but challenged**

Misuse of state funds to influence media output

The use of state funds for the purpose of influencing media output is not currently regarded as a concern or potential risk in Finland. The majority of state-funded

⁶See (in Finnish) Hellman, Heikki (2024). "Median keskittymiselle on tulossa jarru." (Brake on media concentration). Kanava 52(6): 48-51.

⁷"[Lausuntokierros: Ylen rahoitusta vuosittain nostava indeksi jäädytetään 2025–2027](#)".

(Consultation round: The index that annually increases Yle's funding will be frozen from 2025 to 2027).

⁸See [here](#) (in Finnish).

⁹See [Ministry of Transport and Communications: Act on the Finnish Broadcasting Company to be amended to increase openness](#).

¹⁰Ministry of Transport and Communications: [Minister Ranne: Openness of Yle's operations and finances must be maximised through legislative amendments](#)

¹¹"[Yleisradion rahoitus tulee ohjata julkisen palvelun ydintehtävään](#)." (Yle's funding must go to the core purpose of public service. Comment on the decision of the parliamentary working group).

content is disseminated at the regional and local levels, with municipalities using local media outlets for the dissemination of announcements. Some experts have noted that this EMFA provision may simply result in additional responsibilities for media outlets, with minimal impact on media freedom.

- Legislation in line with EMFA provisions: **No**¹²
- Fair and transparent allocation of state funds to media: **Yes**

Media pluralism and political/state influence over news media

One of the key issues in the context of EMFA is that of ownership concentration. This aspect of media pluralism has been identified by the Media Pluralism Monitor as a potential risk for Finland.¹³ In the 2023-2024 period, the Government commissioned an academic analysis on media concentration and pluralism in Finland (published in March 2024).¹⁴ This analysis will most likely inform the ongoing discussions around (and national monitoring of) EMFA. It is anticipated that EMFA will require amendments to competition legislation. As previously stated, it remains uncertain which regulatory authority will assume responsibility for monitoring media pluralism.

It is noteworthy that an interview study on Finnish news media professionals revealed some stakeholders to be cautious about EMFA's influence on media freedom. They observe that EMFA's objective is to prevent media content from being used for the political purposes of authoritarian regimes. However, in their view, in developed democracies where the media has robust self-regulatory mechanisms in place, the impact could be the opposite. Indeed, some interviewees suggested that inadequate implementation could, in the worst case, result in a situation where new legislation would afford the state and authorities greater opportunities to intervene in media content.¹⁵

- Legislation in line with EMFA provisions: **No**
- Effective media pluralism: **Yes**

¹²In the Finnish context, this provision is not deemed relevant.

¹³[Media Pluralism Monitor 2024: Finland](#).

¹⁴Lehtisaari, Katja et al. (2024). [Median keskittyminen ja mediasisältöjen moninaisuus Suomessa](#). Media concentration and diversity of media content in Finland. Publications of the Government's analysis, assessment and research activities 2024: 6.

¹⁵Pöyhtäri, Uutismedia and uusi viestintäympäristö, *cit.*

INDEPENDENCE OF MEDIA REGULATORS

This section discusses how Article 30 of the AVMSD (Directive 2010/13/EU) is implemented.

Summary

In Finland, two key regulatory authorities oversee compliance with AVMSD and EMFA: Traficom (under the Ministry of Transport and Communications) and KAVI (under the Ministry of Education and Culture). Traficom is the main authority for EMFA. The roles and responsibilities of these regulatory authorities are clearly defined in legislation, and they publish an annual report detailing their activities and budget spending. While there is no independent body that monitors their activities, they are both accountable to their respective ministries, the Parliament, and ultimately to the Chancellor of Justice in the event of any potential misconduct. There have been no instances in recent times where the activities of the regulators have been called into question.

Legal and operational independence

The media regulatory authorities in Finland are legally and functionally independent of the government. Two authorities are responsible for implementing Article 30.¹⁶

Traficom¹⁷ is responsible for tasks related to market conditions and distribution, as defined in the Traficom Act.¹⁸ In 2024, an amendment to the Act designated Traficom as the national regulatory authority for the Digital Services Act (DSA).

The National Audiovisual Institute (KAVI)¹⁹ is governed by the KAVI Act.²⁰ The Institute's Media Education and Audiovisual Programmes Department oversees compliance with the Act on Audiovisual Programmes²¹, including adherence to the AVMSD. Traficom is the primary regulatory authority for the media sector, with KAVI overseeing certain aspects of the Audiovisual Media Services Directive (AVMSD).²²

¹⁶It should be noted that in addition to the Acts and Decrees mentioned in this section, Article 30 in the AVMSD also pertains to the Act on the Autonomy of Åland, whereby “For the purpose of decision-making on the measures in Finland relating to decisions made by the European Union, the legislative power and the administrative power shall be divided between Åland and the State” and “The Provincial Government has the right to be in contact with the European Commission in matters falling within the jurisdiction of Åland and involving the enforcement in Åland of decisions made within the European Union. The Provincial Government and the Finnish Government shall decide in more detail how the Finnish Government is to be informed of such contact.”

¹⁷See more [here](#).

¹⁸[Act on the Finnish Transport and Communications Agency](#) (23.11.2018/935), hereafter Traficom Act.

¹⁹See more [here](#).

²⁰Act on the National Audiovisual Institute (1434/2007), hereafter KAVI Act.

²¹[Act on Audiovisual Programmes](#) (710/2011), hereafter Audiovisual Act.

²²See, e.g., [AVMSD Database of the European Audiovisual Observatory](#).

The authorities are also bound by the general principles of good administration set out in the Administrative Procedure Act²³, which require them to treat all persons involved in the administration fairly and to use their powers only for purposes permitted by law. The authorities' actions must be impartial and proportionate to the objective pursued.

Composition of the regulators' board

The Director General, appointed by the government, heads the Traficom agency. The Director General is responsible for the development of the agency's operations, effectiveness and achievement of performance targets. The Director General has the authority to appoint or hire other personnel, unless otherwise specified in the organisational rules²⁴ which are set out in a separate decree²⁵. The Director's term of office is five years. The Civil Servants Act sets out the grounds for dismissal of civil servants.²⁶

The Director is supported by the Sanctions Committee at Traficom. The latter will impose agency sanctions when the amount in question exceeds €100,000²⁷. The Sanction Committee makes its decisions based on the information presented. The authority of the Traficom to impose sanction fees is set out in other legislation. Traficom is responsible for appointing the Chairman, the Vice-Chairman and three members of the Sanctions Committee. It is essential that these officials have a thorough understanding of the relevant regulations and possess the requisite legal expertise. The term of office for the Sanctions Committee is three years. The Chair, Vice-Chair and members of the Sanctions Committee shall act independently and impartially in the performance of their duties.

KAVI is led by a director, with deputy directors overseeing specific areas of responsibility. The Ministry of Education and Culture is responsible for appointing the Deputy Director of the Department of Media Education and Image Classification.²⁸

There is no representation from opposition or independent NGOs on the regulatory authorities.

Independence of the regulators' members

The current legal framework ensures the independence of the regulatory bodies.

²³Administrative Procedure Act (434/2003).

²⁴Traficom Act, Art. 4.

²⁵Decree by the Finnish Government (1183/2018), see [here](#).

²⁶Act on Public Officials in Central Government (750/1994); and Decree on Public Officials in Central Government (971/1994).

²⁷It should be noted that Traficom deals with a great variety of issues and this is a general principle - not something that has impacted the media sector so far. [Here](#) is one example.

²⁸Government Decree on the National Audiovisual Institute (712/2013; in Finnish), Art. 3.

According to the Constitution²⁹, a superior authority is precluded from interfering in a legally binding manner with the activities of a subordinate administrative body in the exercise of its decision-making power. A ministry may issue general regulations and instructions to its subordinate agency regarding the performance of administrative tasks, but it is not permitted to dictate the manner in which an agency should resolve an individual administrative matter. Furthermore, the Ministry is not permitted to reserve the power to decide on a particular matter within the agency's remit unless such power is expressly granted to it by law. The actions of the agency must be impartial and proportionate to the objective being pursued.

Financial autonomy

In theory, there is a financial dependency on the government budget. While the law does not stipulate the budget, both Traficom and KAVI are required to submit annual reports on their budgeting.

Tasks and accountability

In general, Article 30 of the AVMSD did not require any changes in Finnish legislation, as the Constitution³⁰ already stipulates that the exercise of public power must be based on the law. A higher authority cannot interfere in a legally binding manner in the activities of a lower administrative body in the exercise of its decision-making power. However, a ministry may, for example, issue general regulations and instructions to its subordinate agency to perform administrative tasks.

Traficom is responsible for addressing a range of issues³¹, including the management of the National Cyber Security Centre. The competencies and powers related to media activities are outlined in the Act³² as follows:

- The regulation, licensing, approval, registration, and oversight tasks related to transportation and electronic communications, competency and examination tasks in the sector, information services, and statistics for the sector;
- The development and promotion of transportation and communication services and their availability, as well as the functionality of transportation and communication markets, and the protection of users' rights;
- The advancement of digitalization and automation in communication, as well as their markets, facilitates trials, research, and innovations related to communication;
- Planning the use of radio frequencies, promoting the technical implementation

²⁹Constitution of Finland.

³⁰Constitution of Finland, *cit.*

³¹See [here](#).

³²Traficom Act, Art. 2.

of radiocommunications, investigating and resolving interference in radiocommunications, overseeing the market regulation of radio equipment, monitoring compliance with network operating licence conditions, and managing radio licensing and other frequency management tasks;

- The administration of state aid and grant tasks for the field, excluding PSM;
- The issuance of technical regulations related to its sector within the scope of its specifically designated authority;
- Participation in international cooperation within its sector; and international technical agreements, provided they do not fall under the domain of legislation.

KAVI's mission, according to the law, is to:

- Acquire films, television and radio programs, as well as related artefacts and other materials; to record and archive television and radio programs; and to restore the materials in its collections;
- Promote media education, children's media skills, and a safe media environment for children, and to provide information about issues concerning children and media;
- Promote awareness of its field's culture by making films and programs available to the public for cultural, educational, and research purposes, by organising screenings, and by exhibiting materials related to its field;
- Promote and conduct research in its field and provide related services;
- Carry out the classification and supervision tasks prescribed by the Audiovisual Act and other statutory duties, as well as oversee the training of audiovisual program classifiers;
- Perform other tasks separately prescribed by law or government decree, or assigned by the Ministry of Education and Culture.

Appeal mechanisms

An appeal against a Traficom supervisory decision may be lodged with the Market Court or the Supreme Administrative Court.³⁵

Should any party wish to appeal a decision regarding the classification of an audiovisual programme made by the Media Education and Audiovisual Programmes Unit at KAVI, they may submit a complaint to the Audiovisual Programme Board³⁶. A complaint may be filed by the party directly affected by the decision, or by any other party whose rights, obligations or benefits are directly affected. In the event that a party is dissatisfied with a decision, they may apply for rectification. A decision on a rectification request may be legally appealed. In accordance with the provisions set forth in the Act on Audiovisual Programmes³⁷,

³³See [here](#).

³⁴Kavi Act, *cit.*

³⁵Act on Electronic Communications Services (917/2014), Chapter 43. In the case of appeals based on the Digital Services Act, the Market Court will be the designated authority. For all other matters, unless otherwise specified, the Administrative Court will assume the role of the appeal authority.

³⁶Audiovisual Law, *cit.*

³⁷Audiovisual Law, *cit.*

the Film Classification Board serves as the initial appellate authority. However, its decisions may be further appealed to the Supreme Administrative Court. Any further appeals will be directed to the Administrative Court (with the option of a subsequent appeal to the Supreme Administrative Court, if applicable).³⁸

The Audiovisual Programme Board comprises a Chairman and Vice-Chairman, along with four other members, each with a personal deputy. The government appoints members and deputy members for a term of three years.

Before making any significant decisions, Traficom follows a consultation process per the law.³⁹ Until September, there has been no instance in which a decision made by the regulatory authority has been appealed in 2024.

Power to request information

Members of the regulatory authorities are authorised to request natural or legal persons to provide information and data within a reasonable timeframe that is proportionate and necessary for the completion of their assigned tasks.

Independent monitoring of the regulator's activity

The decisions of the regulatory authorities are made public. The Act on the Openness of Government Activities requires the authorities to promote transparency in their activities and, among other things, to produce statistics and other publications related to its field of operation.⁴⁰

Both Traficom and KAVI make their annual reports available to the public on their respective websites. In line with its broad remit, Traficom produces a range of thematic reports. Neither Traficom nor KAVI is subject to independent monitoring of its activities.

They are accountable to the relevant ministries. Ultimately, the Chancellor of Justice is responsible for ensuring that all public officials and other employees or bodies assigned to perform public duties comply with the law and fulfil their obligations.⁴¹

³⁸Administrative Judicial Procedure Act (586/1996).

³⁹Act on Electronic Communications Services, Art. 310.

⁴⁰Act on the Openness of Government Activities (621/1999).

⁴¹More about the supervisory duties of the Chancellor of Justice, see [here](#).

INDEPENDENCE OF PUBLIC SERVICE MEDIA

This section discusses how Article 5 of the EMFA is implemented.

Summary

The future of Yle has been the subject of intense political debate during 2024 particularly regarding efforts to apply heavy budget cuts and curtail areas of its remit such as covering entertainment. The parliamentary committee took months to find a compromise after much heated debate. Had they failed to reach an agreement, the government planned to impose severe cuts that would have had a devastating impact on Yle's output.

According to experts⁴², several key issues arise from the debates which may be impacted as Finland revises legislation to meet the requirements of EMFA. These include:

- The government has put forth a proposal to impose restrictions on Yle's entertainment-focused content output. It is unclear whether such a limitation would infringe upon media diversity and therefore breach the Yle Act, which stipulates that information should be “comprehensive and diverse”.
- The Constitutional Law Committee of Parliament is tasked with establishing the restrictions that may be imposed on broadcasting activities (the duties of the public broadcaster) and whether they may be limited. It is not within the remit of the Committee to provide an interpretation of the EMFA. The Committee's remit is to examine the government's proposal concerning the Finnish Constitution. Its sole responsibility is to assess the constitutionality of legislative proposals, in this case determining the acceptability of permissible restrictions on freedom of expression.
- In Finland, the case has been made that Yle should not be granted preferential treatment in the context of the government's savings measures. Nevertheless, the fundamental premise of EMFA is that public service media should be afforded special consideration to guarantee the autonomy of news and current affairs operations (journalism). In particular, it states that funding procedures must guarantee that public service media providers have **adequate, sustainable** and **predictable** financial resources that correspond to the fulfilment of their public service remit and their capacity to develop.

With regard to the stakeholders, Yle and the Finnish Media Federation (an advocacy organisation for private companies in the media and printing industries) have differing perspectives on the implications of EMFA for public service media. Please find below a few quotes from each:

Yle's CEO: *“Public service is seen in the regulation primarily from the perspective of*

⁴²Martti Soramäki, 11 June 2024, presentation in a research workshop on Finnish media policy. Cited with the permission of the presenter.

safeguarding democracy, freedom of speech, and community. No commercial company can similarly create a shared public space that brings together reliable news and shared experiences for all people, regardless of wealth, place of residence, or disabilities. Independence requires stable funding.”⁴³

The Finnish Media Federation: *“The Media Freedom Act does not require expanding the public broadcaster. (...) Yle does not operate in a vacuum. Its funding must take into account the state of the national economy and other public finances. (...) Yle’s compliance with the law and the requirements of the EU’s state aid regulations remains incomplete.”⁴⁴*

A proposed change to Yle’s funding by the parliamentary committee could have an impact on Yle’s operations and lead to further discussions about Yle’s funding, given the ongoing challenges facing the Finnish PSM from political actors and commercial competitors.

The decision regarding cuts to Yle would have been made by the right-wing government if the parliamentary working group had not reached a consensus after significant disagreement and several delays in September 2024. This process has prompted researchers to identify potential risks for Finland. “If Yle’s fate had been left to the government, we would practically be on the path of Hungary, or at least close to it.”⁴⁵

The ongoing debate on Yle, including competitive coverage in commercial media and an official citizens’ initiative by the right-wing youth groups to restrict Yle’s operations (September 2024),⁴⁶ coupled with the new policy processes (the aforementioned amendment to the Act on the State Television and Radio Fund and the proposed amendment to the Act on Yle), are arguably the clearest signals of the mounting challenges of the Finnish media welfare state.

Editorial and operational independence

The operations of Yle, the Finnish public service media, are primarily guided by the Yle Act⁴⁷, the Limited Liability Companies Act⁴⁸, and other relevant legislation pertaining to public broadcasting. It is the responsibility of Traficom to ensure that Yle’s operations are conducted in line with all applicable laws and regulations. As required by law, Yle provides an annual report on its activities to Parliament and Traficom. All of the company’s reports, along with the board’s annual reports and audited financial statements, are available for download from Yle’s website (see

⁴³“Merja Ylä-Anttila: Uusi EU-asetus edellyttää, että valtio turvaa Ylen riippumattomuuden” (Merja Ylä-Anttila: The new EU regulation requires the state to safeguard Yle’s independence), Yle, 22 May 2024 (in Finnish).

⁴⁴“Medianvapaussäädös ei pakota lihottamaan Yleisradiota” (The media freedom act does not force Yleisradio to gain weight), Finnish Media Federation, 24 May 2024 (in Finnish).

⁴⁵Heino Nyyssönen, Helsinki university, “Haastettu johtaja” (Challenged leader).

⁴⁶“Yle kuriin nyt!” (Let’s curb Yle’s activities now!).

⁴⁷Act on Yleisradio Oy (1380/1993), hereafter Yle Act.

⁴⁸Limited Liability Companies Act (624/2006).

more details under Independent monitoring mechanisms below).

Furthermore, Yle is committed to adhering to state ownership steering guidelines in all its operations. Yle ensures that all its content aligns with the guidelines set forth by the Union of Journalists in Finland⁴⁹ and its own ethical standards. Yle is a member of the Council for Mass Media in Finland.⁵⁰

The Yle Act outlines Yle's governance structure (*see Composition of the governing bodies below*), comprising both a full parliamentary presentation and an independent Board of Directors. Furthermore, the Act on the Exercise of Freedom of Expression in Mass Media establishes the freedom of the press as a constitutional right, while also delineating specific provisions for the media. The Act stipulates that any "interference with the activities of the media shall be legitimate only in so far as it is unavoidable, taking due note of the importance of the freedom of expression in a democracy subject to the rule of law." The Act also sets out the duties and responsibilities of media organisations, including the need for responsible editors and the right to reply and correction for any individual.⁵¹

Legal provisions guaranteeing plurality of information

The Yle Act sets out a series of provisions requiring Yle to support democracy and inclusiveness and to treat Finnish-speaking and Swedish-speaking citizens on equal grounds in its broadcasting. It also requires Yle to produce services in the Sami, Romany and sign language, and, where applicable, also in the languages of other language groups in Finland.

Furthermore, the Act stipulates that Yle must support the preservation of Finnish cultural heritage, promote tolerance, equal treatment, equality and cultural diversity, and provide programming for minority and special interest groups.⁵²

Composition of the governing bodies

In line with the Yle Act, Yle's governing bodies are the Administrative Council, the Board of Directors and the Chief Executive Officer (CEO).

Yle's Administrative Council has 21 members elected by Parliament. The Council includes representatives from all parties in Parliament. The Council also includes Yle staff representatives.⁵³

The Council elects and dismisses the Board of Directors and its chair and vice-chair. It decides on major changes to the company's activities and oversees public service

⁴⁹See more [here](#).

⁵⁰See more [here](#).

⁵¹[Act on the Exercise of Freedom of Expression in Mass Media](#) (460/2003).

⁵²Yle Act, Chapter 3, Section 7.

⁵³Yle Act, Chapter 2, Section 5.

programmes. It also evaluates market and societal needs, adopts the company strategy, approves the Board of Directors' annual report and reports back to Parliament.

The company has a Board of Directors elected by the Administrative Council. There must be at least five and at most eight members. The Board of Directors represents several stakeholder groups. They cannot be members of the Administrative Council or the company's senior management. The Board must have experts from different areas and represent both Finnish and Swedish speakers in Finland. One represents Yle personnel, others represent Finnish society.⁵⁴

The Board of Directors elects and dismisses the company's CEO and confirms their terms of office, including salary. It has similar powers of appointment for other members of the company's senior management. It decides the budget for the following year and submits an annual report to Traficom.

Governance bodies: appointment

The law guarantees that the appointment of Yle's governing bodies is based on transparent, open, effective, and non-discriminatory procedures and transparent, objective, non-discriminatory, and proportionate criteria (*see Composition of the Governing Bodies above*).

Governance bodies: term

The duration of the governance bodies' mandate is determined by the Administrative Council, which is, in turn, elected by each new Parliament every four years. This differs from the European Union's MEP elections, which are held every five years.

Governance bodies: dismissal conditions

As previously stated, the Board of Directors, which is politically independent, is responsible for dismissing the CEO and for documenting the decision. In general, the CEO may discuss the decision with the Board or, if the dismissal decision is deemed to violate Finnish laws, may bring the matter to court.

Funding

Yle's funding is a source of political controversy and a contested issue within the commercial media sector. Yle's funding for each year is confirmed annually, in line with changes in the general cost level. The review is based on a legally mandated index adjustment designed to cover the general increase in wage levels and costs.

⁵⁴Yle Act, Chapter 2, Section 6c.

Yle's operations are financed through a combination of general revenue and a levy on radio broadcasting. Additionally, Yle generates revenue from its programming and services.

The Finnish Parliament is responsible for establishing the legislation pertaining to the public broadcasting tax.⁵⁵ The Yle tax is payable by individuals aged 18 and over, as well as entities conducting business, professional activities, or agriculture in Finland.

The Yle tax is 2.5% of income over €14,000. The tax is capped at €163 a year. Those earning less than €14,000 are exempt from this tax. For entities, the Yle tax is based on taxable income. If the income is less than €50,000, no tax is collected. If the income is at least €50,000, the tax is €140 plus 0.35 percent of the income exceeding the threshold, with a maximum annual tax of €3,000. No forms of irregular state aid for Yle could be identified.

Yle's funding is outlined in the Act on the State Television and Radio Fund.⁵⁶ In line with the amendment of 2012, the Fund comprises assets from State Budget appropriations, fees to be collected, and surpluses accumulated from previous financial periods. A portion of the fund's assets is allocated annually to finance Yle's operations, while the remainder may be used to promote television and radio activities.

The current right-wing government established a parliamentary working group with the objective of reviewing the remit and funding of Yle, with the first meeting taking place in autumn 2023. The differing views on the proposed funding cuts for Yle meant that the group was unable to finalise its work by the original deadline of spring 2024. The minister responsible for overseeing legislation on Yle is from the populist right-wing Finns Party, which has been particularly critical of Yle and is advocating significant budget cuts.

While the committee was still debating the proposed cuts to remit and funding, Yle announced organisational changes, including downsizing its Management Group and merging some departments/units.⁵⁷

Furthermore, the Ministry of Transport and Communications has initiated a new procedure to amend the Yle Act⁵⁸, with the objective of "increasing the openness" of its operations.⁵⁹ After lengthy discussions, the parliamentary committee reached a consensus in September 2024. The committee's proposal included freezing the index that annually increases Yle's funding for a three-year period, from 2025 to 2027. The proposal would require an amendment to the Act on the State Television

⁵⁵Law concerning the public broadcasting tax, see [here](#).

⁵⁶[Act on the State Television and Radio Fund \(745/1998\)](#).

⁵⁷See [here](#) (in Finnish).

⁵⁸See, [Ministry of Transport and Communications: Act on the Finnish Broadcasting Company to be amended to increase openness](#).

⁵⁹Ministry of Transport and Communications: [Minister Ranne: Openness of Yle's operations and finances must be maximised through legislative amendments](#).

and Radio Fund.⁶⁰

Independent monitoring mechanisms

Yle produces an annual report that includes: how it meets legal requirements, how its content is consumed and how Yle is viewed by audiences, as well as Yle's budget and its allocation for operations.

Yle's operations are assessed using a two-tiered process. The Administrative Council is responsible for overseeing and supervising tasks related to public service programme activities, including programme-related aspects, and for presenting an annual report to Parliament.

The Board of Directors is responsible for formulating the company's strategy and appointing the relevant editors, as outlined in the Freedom of Expression Act. In addition, the Board is obliged by the Yle Act to submit Yle's Annual Report to Traficom by the end of April each year. The report must include the information necessary for Traficom, which monitors compliance and ensures that there is no underpricing or cross-subsidisation in use. Issues of the non-commercial nature of Yle, as required by Yle Act, and key requirements outlined in the AVMSD, as set out in the Act on Electronic Communications Services must be reported to Traficom.⁶¹

Yle also issues a number of other annual reports, including the Operating Report and Financial Statements, the Report on the Governance and Control System, the Remuneration Report, and the Responsibility Report, as well as other documents on Yle's operations, audiences, and collaborations.⁶²

Yle reports its financial information and funding usage to Traficom. The issues of funding levels and operational transparency are being revisited, the former by the parliamentary committee and the latter through a proposed amendment to the Yle Act initiated by the Ministry of Transport and Communications in August 2024.

The reports to the Parliament (via the Administrative Council) and to Traficom (via the Board of Directors) are public, as are any expert assessments.

In terms of content, the Freedom of Expression Act enables any individual to request a response or correction from all mass media outlets, including Yle. The request must be submitted to the relevant editor within 14 days of the publication of the material in question. In the event of rejection, the individual submitting the demand is entitled to have the matter of whether the conditions for a right of reply or correction have been met considered by the District Court of their domicile. This can be done at any point within 30 days of receipt of the written notification containing the reasons for rejection.

⁶⁰"Lausuntokierros: Ylen rahoitusta vuosittain nostava indeksi jäädytetään 2025–2027," *cit.*

⁶¹Yle Act, Art. 12.

⁶²See [here](#) (in Finnish), e.g.

Furthermore, Yle is a member of the Council for Mass Media, through which the majority of content-related complaints are processed. These complaints typically concern relatively minor factual errors, and Yle publicises the decisions.⁶³

⁶³See [here](#) (in Finnish).

MISUSE OF STATE FUNDS TO INFLUENCE MEDIA OUTPUT

This section discusses how Article 25 of the EMFA is implemented.

Summary

There is no evidence to suggest that the misuse of state funds to influence media output is a current issue or a risk in Finland. State advertising is limited to announcements by municipalities in local media outlets, and the state subsidies to media organisations are also limited.

Legal provisions on public procurement of state advertising

Finnish legislation does not provide for legal guarantees that public expenditure allocated for state advertising is distributed to a diverse range of media service providers.

Criteria for distribution and tender procedures

Currently, the Finnish government allocates minimal funding to advertising in the media, and thus there are no specific regulations governing the distribution of these funds.

Moreover, Finland does not offer any direct financial assistance to the media sector beyond limited support for minority magazines.⁶⁴ The current support models include a reduced VAT rate for newspapers and digital magazines and a comprehensive public service funded by the public service broadcasting tax.

The level of financial support provided to the press and media, beyond public service media, is comparatively modest when benchmarked against the subsidies offered by other Nordic countries.⁶⁵ The Ministry of Education and Culture offers financial assistance to media outlets publishing in minority languages.⁶⁶ Some subsidies for audiovisual productions in Finland are provided by the innovation funding agency, Business Finland.⁶⁷ Additionally, Traficom oversees the administration of several temporary subsidies for news media and journalism initiatives (*see below for details*).

⁶⁴Ministry of Transport and Communication: [Report on Media Support Impacts Published](#).

⁶⁵[Nordicom: Direct media subsidies to news media – a Nordic overview](#).

⁶⁶[Government Decree on Support for the Press \(389/2008\)](#); see also [here](#) (in Finnish).

⁶⁷[Government Decree on the payment of compensation for audiovisual productions for 2024–2026 \(1203/2023\)](#).

Transparency of state media contracts

Statutory reporting requirements by municipalities and municipal federations to the State Treasury's financial information service provide a framework for transparency regarding state advertising.

Media grants are publicly documented. Information regarding subsidies and the application process, along with the list of selected grantees, is made available online. One example is the process and criteria for subsidies for the news media regarding the pandemic years, which can be found on the Traficom website. The one-time subsidy was incorporated into the government's supplementary budget for 2020.

Local newspapers may also receive assistance with distribution costs. Details of eligibility and the application process can be found on the Traficom website. This subsidy is temporary and will end in 2029. The initiative was introduced to guarantee the delivery of newspapers five days a week in sparsely populated areas.

Monitoring state advertising spending

Given that the Finnish state does not allocate a considerable amount of state advertising to media outlets, there has been no need for a monitoring mechanism. Local municipalities do place official announcements in local newspapers, which represents a significant source of revenue for those papers. However, some in the Finnish news media industry suspect that EMFA will require further work and impose additional costs on media organisations in order to comply with the reporting process.

MEDIA PLURALISM AND POLITICAL/STATE INFLUENCE OVER NEWS MEDIA

This section discusses how Articles 6 and 22 of the EMFA are implemented.

Summary

Apart from the ongoing pressures on Yle, political influence over the media is not a significant concern in Finland. However, as highlighted in the Media Pluralism Monitor, market concentration represents the most significant risk to the Finnish media system. In light of the limited linguistic media market and the difficulties posed by platformisation⁶⁸, this outcome is to be expected. A recent academic report, commissioned by the government, provides the following summary of the situation:

“National players continue to have a crucial role in the Finnish media. While digital platforms are growing, traditional distribution channels still have a role to play. The concentration of the news media industry is evidenced by increased cooperation within and between news media groups, as well as shrinking editorial organisations. The degree of concentration varies among media branches, and they have been partly developing in different directions in this regard. The radio and television sectors have evolved towards increased competition, while the earlier abundance of newspapers has decreased towards a more concentrated industry structure. This concentration has granted increased resources for producing quality media content, while increased cooperation within media groups seems to narrow down the news offer. The findings of the report reflect the overlap and distribution practices within media groups.”⁶⁹

Transparency: legal requirements

While Finland has a number of laws regulating the media, there is currently no sector-specific legislation regulating media concentration or monitoring concentration in the newspaper publishing sector. The Act on the Exercise of Freedom of Expression in Mass Media⁷⁰ stipulates that any interference with communication must be limited to what is necessary, given the vital role that freedom of speech plays in a democratic system of law. In light of the above, it can be seen that the current approach to media concentration is embedded within the overarching framework of competition regulation set out in the Competition Act.⁷¹ This is overseen by the Finnish Competition and Consumer Authority (FCCA).⁷²

⁶⁸Sirkkunen, Esa et al., 2021, *cit.*

⁶⁹Lehtisaari, K. et al., 2024, *cit.*

⁷⁰Ministry of Justice, Finland Act on the Exercise of Freedom of Expression in Mass Media.

⁷¹[Competition Act 948/2011](#).

⁷²See [here](#).

Media ownership

In accordance with the Limited Liability Companies Act, Finnish companies are obliged to disclose their legal name and contact details. This information must be readily accessible and is typically available through the Finnish Trade Register of the Patent and Registration Office⁷³. Furthermore, the Act requires that information regarding the company's shareholders, including those with the ability to exert influence on the company, be registered and made available through the Register.

State funding

The Act on the Openness of Government Activities sets out the general rules governing transparency in the allocation of public funds and state resources. The requirement for media companies to report the total annual amount of public funds received for state advertising, as well as advertising revenue received from third countries, represents a new aspect not present in any current national law.

National media ownership databases

There are no legal provisions requiring media regulators in Finland to develop national media ownership databases containing all the information above.

Assessment of media market concentrations

Besides competition regulation, there are currently no legal guarantees in national law that set out substantive and procedural rules needed to assess media market concentrations that could significantly impact media pluralism and editorial independence.

As outlined in a recent report on media concentration⁷⁴, the Competition and Consumer Authority (FCCA) oversees market efficiency, intervening in practices such as cartels and mergers that could result in the misuse of a dominant market position. The objective of merger control is to safeguard effective competition and, in turn, the market economy from the adverse effects of market concentration. Notable amendments were made to the Competition Act in 2022, based on the ECN+ Directive. Some of the amendments have significant implications for companies and industry organisations. The amendments included an expansion of the regulatory authority's powers, notably its ability to conduct consultations, request information, and exercise inspection powers. In general, the scope of its powers was broadened.⁷⁵

⁷³See more [here](#).

⁷⁴Lehtisaari, K. et al., 2024, *cit.*

⁷⁵Confederation of Finnish Industries, EK 2002. Ohje kilpailulainsäädännön noudattamisesta, see [here](#).

Notification of media market concentrations

Initially, mergers had to be reported to the FCCA if the combined global turnover of the parties exceeded €350 million and the turnover of at least two parties in Finland exceeded €20 million.

As of the beginning of 2023, the law was amended to significantly tighten the notification threshold. In accordance with the amended legislation, a merger must be reported to the FCCA if the combined turnover of the parties in Finland exceeds €100 million and the turnover of each party in Finland exceeds €10 million. The FCCA approves the majority of reported transactions as is, but may intervene if the transaction is deemed to prevent effective competition in Finland to a significant extent. The imposition of conditions represents the primary means of addressing the detrimental effects of a merger.

At present, the FCCA is the only organisation conducting such assessments. In the context of mergers involving media organisations, the FCCA has indicated that its remit does not extend to assessing the impact on media pluralism and diversity.

During the 2000s, the FCCA made at least 30 decisions⁷⁶ related to mergers in the media sector. Of the total number of decisions made, three were conditional, while in 27 cases the reported transaction was approved as is. In addition, the FCCA issued a number of decisions in relation to merger investigations and has also reviewed a number of other reported mergers. The majority of these mergers involved distribution companies, book publishers and information services. There were only a few instances where decisions regarding the concentration of news media were made.

The most recent decision concerning news media was made in June 2023, when the FCCA approved a transaction for a Swedish news publisher to acquire control of a company publishing Swedish-language newspapers in Finland. The FCCA concluded that the merger would not have a significantly adverse effect on competition in the Finnish market. The decision stated that the parties' activities were complementary and that their market shares were low in all examined markets.⁷⁷

In a further recent development, the FCCA gave the green light to a merger between a major publisher, Sanoma, and another company's regional newspaper business and related printing operations. This constituted a notable transaction in the field of news media for Finland. The FCCA's assessment concluded that the merger would not significantly impede effective competition in the Finnish market, nor would it prevent competition in media advertising, newspaper printing, or news content supply markets.⁷⁸

⁷⁶Lehtisaari, K. et al., 2024, *cit.*

⁷⁷Lehtisaari, K. et al., 2024, *cit.*

⁷⁸Lehtisaari, K. et al., 2024, *cit.*

In both instances, the FCCA stated in its ruling that it could only assess the merger's impact within the scope of its authority (competition regulation), not in regard to its impact on media pluralism and diversity.

Impact of media market concentration on media pluralism

It is not a requirement of national law that the assessment of media market concentration should take into account the expected impact of such concentration on media pluralism. This includes the effects on the formation of public opinion and on the diversity of media services and the media offering on the market.

Impact of media market concentration on editorial independence

It is not a requirement of national law that the assessment of media market concentration should take into account the expected impact of such concentration on editorial independence.

WHAT IS NEEDED TO CAPTURE-PROOF THE FINNISH MEDIA

Although Finland performs well in many areas pertaining to EMFA, and the stakeholders believe that the Act will have a negligible impact on the Finnish media landscape in practice, there are some developments that could be perceived as contradictory to the purpose of EMFA. One readily apparent example is the discursive and regulatory pressure exerted on the Finnish public service media outlet Yle.

A further recent development is the Ministry of Justice's proposal to reduce state support for the Finnish self-regulatory body of the journalistic media sector, the Council for Mass Media in Finland (JSN), as part of the wider budgetary reductions in subsidies for civil society organisations. This has prompted debate surrounding the current state of the national media landscape and the self-governance of journalism.

There is a divergence of opinion among stakeholders as to the optimal status of the JSN. Some believe that it should be a fully independent body, without government support, while others consider a partial subsidy to be a public investment in trustworthy media. Following extensive deliberations, the proposed reduction in funding has been rescinded, resulting in only a modest reduction in JSN's annual allocation. Nevertheless, a further proposed reduction concerns the media-related statistics produced by Statistics Finland. The discontinuation of these statistics has been proposed on the grounds that they are not legally mandated.

Nevertheless, the impact of EMFA in Finland is anticipated to be relatively limited in terms of enhancing media freedom.

The following recommendations, including summary insights from experts consulted for this report, are structured as follows:

- a) Recommendations aimed at aligning national legislation with the EMFA's general provisions; and
- b) Recommendations aimed at enhancing the media environment regardless of EMFA.

Independence of media regulators

Brief overview of EMFA provisions

The 2018 amendment of the Audiovisual Media Services Directive (AVMSD) already set out the requirements for independent media regulators. These include functional independence from governments, impartiality and transparency, operation without instructions, clearly defined competences and powers, an effective appeal mechanism, a proper mechanism to appoint and dismiss the head

⁷⁹See, e.g., Jaakkola, Maarit (2024), [Tarvitsemme tilastojen luomaa tietopohjaa](#), 'We need the knowledge base created by statistics', *Kulttuurintutkimus* 41 (2024): 2.

and the body of the authority, and also adequate financial and human resources and enforcement powers. In light of the above, EMFA essentially reiterates the stipulations set forth in Article 30 of the AVMSD, with the notable addition of provisions pertaining to the requisite resources, specifically technical resources, and the authority to request information and data. Consequently, prior to the implementation of EMFA, Member States are obliged to adhere to the majority of the requirements pertaining to independent media regulators as outlined in Article 30 of the AVMSD.

Aligning with EMFA's general provisions: what is needed?

- The respective roles of the media regulatory authorities still need to be clarified.

Further enhancing the media environment: what is needed?

In Finland, the independence of the regulators is well established. In recent years, Finland has had to contend with a significant increase in EU regulations and new administrative responsibilities, which have also created challenges in terms of resource allocation. As there have been no challenges to independence to date, the main recommendations relate to the role of legislation and the new burden EMFA brings to regulators.

- In Finland, the regulatory approach to the media sector is typically characterised by a preference for a light-touch approach, with a view to avoiding undue burdens on regulators. This should remain the case under EMFA.
- The supervisory framework of EMFA is regarded as exceptional, as it encompasses binding legislation with oversight obligations. It is recommended not to introduce further regulation until the effects of EMFA have become apparent.
- There is room for interpretation in the definitions set out in EMFA for instance regarding the sufficient level of funding for PSM. It is essential that the Commission provides clear guidance to Member States and their regulators on specific regulations and expectations.

Independence of public service media

Brief overview of EMFA provisions

Article 5 of EMFA requires that governments guarantee the independent functioning of public media, including ensuring their editorial and functional independence, that procedures for appointing the management guarantee the independence of public media, that those appointed are done so on the basis of transparent, open, effective and non-discriminatory procedures and criteria, that funding is transparent, adequate, sustainable and predictable and can guarantee the editorial independence of the public media, and that an independent body is designated to monitor the application of these principles.

Aligning with EMFA's general provisions: what is needed?

Further clarification is required on a number of key issues regarding Yle.

- **Remit and funding:** The core principle of EMFA is that public service media should be accorded special consideration to guarantee the independence of news and current affairs operations (journalism).
- **Regulatory/oversight questions:** A parliamentary committee conducted a review of Yle's mandate and funding structure. The amendments to the Yle Act include the criteria and procedures required for the selection and dismissal of Yle executives in accordance with the EMFA.

The following questions arise:

- The role of the new Administrative Council elected by Parliament should be clearly defined and safeguards should be put in place to ensure that it acts fully independent of government.
- The future funding model of Yle should meet EMFA rules of transparent and objective criteria and adequate, sustainable and predictable financing to allow Yle to fulfil its public service mandate.

Further enhancing the media environment: what is needed?

The ongoing debate on Yle, with political attacks and negative coverage by commercial media in the summer and autumn of 2024, coupled with the new policy processes, indicates that the Finnish media welfare state is facing significant challenges. EMFA does not take a detailed position on the scope of the public service mandate and funding levels, nor does it affect the application of EU state aid rules to public service broadcasting. Its principles, however, can help support and guide comprehensive national debates that are necessary about the Finnish public service remit and the resources it requires. It is also crucial to address the vitality of the entire national media system and manage the competing interests and roles of PSM and commercial media.

In particular the debate should address the emergence of global platforms, the challenges this poses for national media outlets and how EMFA and the DSA can help protect a pluralistic media in this new landscape.

Misuse of state funds to influence media output

Brief overview of EMFA provisions

Article 25 of the EMFA states that, while public procurement rules remain unchanged, state advertising must be awarded in accordance with transparent, objective, proportionate and non-discriminatory criteria.

Aligning with EMFA's general provisions: what is needed?

- Media companies should publicly declare the amount of public funds received for state advertising and advertising revenue received from third countries.
- Rules should be introduced so that all government institutions and state owned companies that spend public money on advertising follow the requirements set out by EMFA.
- An appropriate body needs to be designated to monitor and report on the expenditure of state advertising to ensure compliance.

Further enhancing the media environment: what is needed?

The article has relatively limited relevance for Finland, given the minor role of state and municipal-funded public advertising. Furthermore, the article covers a wide range of topics, and there is currently no known equivalent authority in Finland.

Media pluralism and political/state influence over news media

Brief overview of EMFA provisions

Article 6 of EMFA requires news media organisations to provide information about their owners, including potential conflicts of interest, and to implement measures to ensure editorial independence. Article 22 of the EMFA requires governments to implement a system for the assessment of concentrations that could have a significant impact on media pluralism and editorial independence.

Aligning with EMFA's general provisions: what is needed?

- An authority or body should be designated to assess media market concentrations and their impact on media pluralism and editorial independence. When media mergers take place the body will be consulted by the competition authority to provide an assessment of the impact of the change in ownership on media pluralism and editorial independence.
- EMFA mandates a continuous monitoring and oversight system for media ownership including direct and indirect owners. This information will aid analysis of levels of media concentration, wherein data on the industry's developments would be systematically gathered and evaluated.

Further enhancing the media environment: what is needed?

The following modifications to competition law might be considered:

- Introduce a clarification in the Competition Act that separate sector-specific regulation applies to media markets.
- The Competition Act should be amended to allow for a lower notification threshold for mergers and acquisitions in the media sector.
- The Competition Act should provide for a distinct right of intervention in the context of media sectors. To illustrate, the FCCA would have the authority to

assess the impact of a merger or acquisition even if the transaction's revenue target falls below the typical notification threshold (see *below*).

The following modifications to communication legislation should be considered:

- The Act on Electronic Communications Services requires clarification to explicitly include consideration of the impact on media diversity in the licensing process. This could result in the introduction of more rigorous language, as outlined in the AVMSD, which sets out diversity and pluralism as key objectives, for instance, in licensing procedures.
- The Act on the Exercise of Freedom of Expression in Mass Media with regard to print media may need clarification to take account of the need to monitor media concentration and editorial independence from the perspective of media diversity.
- A methodology for measuring media pluralism should be developed to ensure a consistent approach to any media merger assessments based on criteria outlined by EMFA.

The media sector in Finland is relatively concentrated, which presents a risk. Nevertheless, consolidation can also provide a means of ensuring the survival of smaller regional media outlets in the Finnish market. Further consideration should therefore be given to the following issues:

- Including a regional-level analysis to assess the risks of media concentration.
- The role of the Editor-in-Chief is of great importance in terms of both journalistic culture and legislation. Media pluralism evaluations should also consider the positive impact of editors-in-chief and the robustness of safeguards for editorial independence in different titles within the same media group.
- It should also evaluate the range and variety of media content through content analysis within the media pluralism methodology.
- The government has put forth a proposal to discontinue the production of media and cultural statistics by Statistics Finland. While not specifically focused on media concentration reporting, these statistics could offer valuable insights into monitoring media diversity and plurality from the perspective of exposure (use/consumption) diversity. It is therefore recommended that it should remain in use as a monitoring tool for the assessment of the impact of EMFA.

MEDIA CAPTURE MONITORING REPORT: FINLAND

JANUARY 2025

This report by IPI is part of the Media Freedom Rapid Response, which tracks, monitors and responds to violations of press and media freedom in EU Member States and Candidate Countries. This project provides legal and practical support, public advocacy and information to protect journalists and media workers.

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