



MEDIA CAPTURE MONITORING REPORT: **FINLAND**

MEASURING EMFA
COMPLIANCE

December 2025



MEDIA CAPTURE MONITORING REPORT: FINLAND

The International Press Institute (IPI) and the Media and Journalism Research Center have partnered up to produce the Media Capture Monitoring Report on Finland, an annual report to measure media capture in the country and the degree to which the Member State meets the new EU regulation to combat the problem.

In August 2025, the European Media Freedom Act (EMFA) came into full force and Member States are required to enact reforms to align with the new regulation.

The Finnish report focuses on 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 report examines the standards prescribed by law and how they are currently implemented in practice. It also sets out the areas of reform needed to bring the country into line with EMFA while also making recommendations for where reform can go further.

The report is intended an important tool for journalist and media rights groups and national policy makers to guide reform and monitor the degree to which Finland is meeting its obligations.

The Media Capture project is a part of the Media Freedom Rapid Response (MFRR), 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.

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TABLE OF CONTENTS

Executive Summary	5
Changes in 2024/25	5
Context: Finland as a media welfare state	5
Independence of media regulators	7
Independence of public service media	8
Misuse of state funds to influence media output	9
Media pluralism and political/state influence over news media	9
Analysis	10
INDEPENDENCE OF MEDIA REGULATORS	10
Summary	10
Legal and operational independence	10
Composition of the regulator's board	11
Independence of the regulator's members	12
Financial autonomy	12
Tasks and accountability	12
Appeal mechanisms	14
Power to request information	14
Independent monitoring of the regulator's activity	14
INDEPENDENCE OF PUBLIC SERVICE MEDIA	15
Summary	15
Editorial and operational independence	16
Legal provisions guaranteeing plurality of information	17
Composition of the governing bodies	18
Governance bodies: appointment	19
Governance bodies: term	19
Governance bodies: dismissal conditions	19
Funding	19
Independent monitoring mechanisms	20
MISUSE OF STATE FUNDS TO INFLUENCE MEDIA OUTPUT	21
Summary	21
Legal provisions on public procurement of state advertising	22
Criteria for distribution and tender procedures	22
Transparency of state media contracts	22
Monitoring state advertising spending	23
MEDIA PLURALISM AND POLITICAL/STATE INFLUENCE OVER NEWS MEDIA	23
Summary	23
Transparency: legal requirements	23
Media ownership	24
State funding	24
National media ownership databases	24
Assessment of media market concentrations	24
Notification of media market concentrations	25
Impact of media market concentration on media pluralism	27
Impact of media market concentration on editorial independence	27

TABLE OF CONTENTS

Recommendations	27
INDEPENDENCE OF MEDIA REGULATORS	27
Brief overview of EMFA provisions	27
Aligning with EMFA's general provisions: what is needed?	28
Further enhancing the media environment: what is needed?	28
INDEPENDENCE OF PUBLIC SERVICE MEDIA	28
Brief overview of EMFA provisions	28
Aligning with EMFA's general provisions: what is needed?	29
Further enhancing the media environment: what is needed?	29
MISUSE OF STATE FUNDS TO INFLUENCE MEDIA OUTPUT	29
Brief overview of EMFA provisions	29
Aligning with EMFA's general provisions: what is needed?	30
Further enhancing the media environment: what is needed?	30
MEDIA PLURALISM AND POLITICAL/STATE INFLUENCE OVER NEWS MEDIA	30
Brief overview of EMFA provisions	30
Aligning with EMFA's general provisions: what is needed?	30
Further enhancing the media environment: what is needed?	30

Changes in 2024/25

In Finland, work to align national laws with EMFA started in October 2024. This resulted in the adoption of the Act on the Supervision of Media Markets and several amendments to existing laws, designed to ensure compliance with EMFA's core provisions while introducing minimal additional changes. The only exception was the revised Act on Yleisradio, which introduced further transparency obligations for public service media. Both the new Act and the amendments entered into force on 8 August 2025.

Context: Finland as a media welfare state

Due to its strong 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 actively encouraged. Other features of the media welfare state model include cultural policies designed to promote media pluralism and consensual solutions between stakeholders. These principles have remained in place despite the relatively small media market for the Finnish language, and the even smaller markets for the country's minority languages. Over the past decades, however, challenges brought by global platforms, alongside socio-political shifts and widening income and cultural inequalities in Finnish society, have impacted the sustainability of this model.¹

The implementation of the European Media Freedom Act (EMFA) presents Finland with a number of challenges, particularly in redefining the role of public service media in the “late-digital era” and addressing the impact of media concentration on pluralism and diversity within Finland's small media market. Overall, public debate on EMFA in Finland has been relatively limited over the past year.

Under EMFA, Finland is required to ensure that its national regulatory framework is able to assess the impact of mergers and acquisitions in the media sector on diversity and independence. This means that, beyond controlling mergers along competition grounds, authorities must also assess their implications for media pluralism, particularly when a merger involves a media service provider or a platform offering access to media content. It has also been necessary to define how certain obligations under EMFA are to be supervised and to specify the national authorities' powers for such oversight.

Another requirement of EMFA concerns national legislation regulating the appointment and dismissal of executives of public broadcasting companies. In Finland, this has been incorporated into an ongoing legislative initiative to amend the Act governing Yleisradio (Yle), the national public service broadcaster.

The drafting of supplementary legislation to implement EMFA began in October 2024, and on 27 June 2025, the President of the Republic approved the amendments, which entered into force on 8 August 2025.

¹ See, 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]. <http://urn.fi/URN:ISBN:978-952-03-2110-9>.

The additions to national law include:

- A new subsection to the Act on the Exercise of Freedom of Expression in Mass Media (460/2003)², clarifying that obligations of media service providers are laid down in EMFA.³
- Amendments to the Act on Yleisradio Oy (1380/1993)⁴ to incorporate EMFA's requirements regarding the criteria and procedures for appointing and dismissing the management of public service media providers.⁵
- New act⁶ on monitoring the media market, including amendments to the Act on Electronic Communication Services, assigning the Finnish Transport and Communications Agency (Traficom) responsibility for monitoring compliance with EMFA obligations in Finland.

The success of EMFA will depend on its implementation. In particular, the assessment of media concentration requires a nuanced, context-specific approach. In its resolution on EMFA, the Finnish Parliament called on the Government to closely monitor the regulation's impacts and, if necessary, to take further steps to safeguard media pluralism and the financial viability of the sector.⁷ It is also notable that the amendments concerning public service media were integrated into a broader revision of the Act on Yle, which also reflects the recommendations of a parliamentary working group calling for reduced funding and greater financial and operational transparency at Yle.

Initially, some stakeholders argued that Finland's robust and free media landscape rendered EMFA somewhat redundant, suggesting that the regulation would have little impact on the vitality of the national media market. Others warned that, if poorly implemented, it could even give the state authorities greater opportunities to intervene in media content.⁸

However, many key stakeholders viewed EMFA as an important democratic and value-based initiative. For them, the regulation represents a tool to safeguard the independence

² See here <https://www.finlex.fi/en/laki/kaannokset/2003/en20030460.pdf>

³ Act Amending Section 5 of the Act on the Exercise of Freedom of Expression in Mass Media 410/2025, noting that The obligations of media service providers are laid down in Regulation (EU) 2024/1083 of the European Parliament and of the Council on a common framework for media services in the internal market and amending Directive 2010/13/EU (the European Media Freedom Act). (In Finnish: Laki sananvapauden käyttämisestä joukkoviestinnässä annetun lain 5 §:n muuttamisesta:

<https://www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2025/410>)

⁴ Act on Yleisradio Oy (1380/1993), hereafter Yle Act, see https://www.finlex.fi/en/laki/kaannokset/1993/en19931380_20170436.pdf.

⁵ Act Amending the Act on Yleisradio 412/2025 (In Finnish: Laki Yleisradio Oy:stä annetun lain muuttamisesta:

<https://www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2025/412>).

⁶ Act on the Supervision of Media Markets 408/2025. (In Finnish: Laki mediamarkkinoiden valvonnasta:

<https://www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2025/408>). In addition, three related amendments: Act Amending Section 30 of the Act on Electronic Communications Services 408/2025, noting that If control changes in a corporate acquisition that, under the Act on the Supervision of Media Markets (408/2025) must be notified to the Finnish Transport and Communications Agency, the change of control must also be notified to the licensing authority at the same time as the filing of the acquisition notification. (In Finnish: Laki sähköisen viestinnän palveluista annetun lain 30 §:n muuttamisesta:

<https://www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2025/409#OT0>); Act Amending Chapter 17, Section 22 of the Code of Judicial Procedure 411/2025, stipulating that source protection is further regulated in Regulation (EU) 2024/1083 of the European Parliament and of the Council on a common framework for media services in the internal market and amending Directive 2010/13/EU (the European Media Freedom Act) (In Finnish: Laki oikeudenkäymiskaaren 17 luvun 22 §:n muuttamisesta:

<https://www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2025/411>). Also, as noted, Act Amending Section 5 of the Act on the Exercise of Freedom of Expression in Mass Media 410/2025 and Act Amending the Act on Yleisradio 412/2025.

⁷ Ministry of Transport and Communication (2025). European Media Freedom Act to be supplemented with national legislation. Press release 27 June 2025.

<https://lvm.fi/en/-/european-media-freedom-act-to-be-supplemented-with-national-legislation>

⁸ See (in Finnish) Pöytäti, 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.

and financial stability of public service media against political influence and disruption, while also strengthening protections for editorial freedom and pluralism.⁹

In practice, the implementation of EMFA in Finland has resulted in targeted additions to national legislation that ensure compliance without extending regulation beyond the scope of EMFA's main provisions. The exception lies in the changes to the Act on Yleisradio, which introduced new transparency requirements for public service media.

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 began in autumn 2024, when the Ministry of Transport and Communications launched the project¹⁰ in consultation with key stakeholders. The government submitted its proposal to Parliament in spring 2025. A public consultation was held throughout the preparation process. These consultations are conducted through an open e-government platform accessible to any individual or organisation. The consultation attracted 25 submissions, mostly from media organisations and related associations, the Finnish Media Council, the journalists' association, ministries, municipalities, several civil society organisations, and two research projects/universities. While some comments reflected the specific missions of individual organisations, the general requests emphasised a simplified and evidence-based approach to implementation.¹¹

The Finnish Transport and Communications Agency (Traficom) has been designated as the national Digital Services Coordinator (DSC) responsible for implementing the Digital Services Act (DSA) and will also oversee compliance with EMFA. Its role includes assessing whether media market concentrations that exceed the turnover thresholds set out in the Competition Act have an impact on media pluralism and editorial independence. Traficom will also establish and host a national open database containing

⁹ This 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, in 2024. In addition, the report draws from two Chatham House reports on multistakeholder roundtables on Finnish media policy, held on 28 March 2025, during which also the first version of this report was discussed, and on 24 September 2025, in which the implementation of EMFA was addressed. <https://www.decatutkimus.fi/artikkelit#Raportit>.

¹⁰ See (in Finnish): Legislative project: Preparation of legislation to complement the EU's Media Freedom Act begins. <https://lvm.fi/-/saadoshanke-eu-n-medianvapausasetusta-taydentavan-lainsaadannon-valmistelu-alkaa>; also, Government proposal for legislation to complement the European Media Freedom Act. <https://valtioneuvosto.fi/hanke?tunnus=LVM033:00/2024>.

¹¹ See (in Finnish): <https://www.lausuntopalvelu.fi/FI/Proposal/Participation?proposald=a26e1836-2cca-4f85-a692-0842d3e25a8f> <https://www.lausuntopalvelu.fi/FI/Proposal/Participation?proposald=861bdfd6-8f38-409a-8f5b-91e08b98c072>.

information on media ownership. In addition, authorities, public bodies, and media service providers will be required to notify Traficom once information on state advertising has been published.¹² With regard to Yleisradio (Yle), the new amendment assigns Traficom a financial supervisory role.¹³

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 2027.¹⁴

Yle has announced organisational changes, including a reduction in the size of its Management Group and the merger of several departments and units as part of cost-saving measures.¹⁵ At the same time, the Ministry of Transport and Communications initiated a new process to amend the Act on Yle¹⁶, with the stated objective of "increasing the openness" of its operations. The amendment also introduced criteria and procedures for the selection and dismissal of executives.¹⁷ Entering into force on 8 August 2025, it incorporates EMFA-specific provisions but also broader transparency requirements.¹⁸

Meanwhile, commercial media, already facing significant sustainability challenges, have been questioning Yle's role, thereby increasing pressure on the public broadcaster to scale back its services.¹⁹

Legislation in line with EMFA provisions: Yes (as of 8 August 2025)

Effective independence: Yes, but challenged

¹² Ministry of Transport and Communication (2025). European Media Freedom Act to be supplemented with national legislation. Press release 27 June 2025.

<https://lvm.fi/en/-/european-media-freedom-act-to-be-supplemented-with-national-legislation>; Act on the Supervision of Media Markets 408/2025.

¹³ Act Amending the Act on Yleisradio 412/2025.

¹⁴ "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), see (in Finnish):

<https://lvm.fi/-/lausuntokierros-ylen-rahoitusta-vuosittain-nostava-indeksi-jaadytetaan-2025-2027-1>

¹⁵ See (in Finnish) <https://yle.fi/aihe/a/20-10006944>.

¹⁶ See Ministry of Transport and Communications: Act on the Finnish Broadcasting Company to be amended to increase openness

https://lvm.fi/-/yleisradiolakia-muutetaan-avoimuuden-lisaamiseksi?languageId=en_US.

¹⁷ Ministry of Transport and Communications: Minister Ranne: Openness of Yle's operations and finances must be maximised through legislative amendments

<https://lvm.fi/en/-/minister-ranne-openness-of-yle-s-operations-and-finances-must-be-maximised-through-legislative-amendments>.

¹⁸ Act Amending the Act on Yleisradio 412/2025.

¹⁹ "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), see (in Finnish):

<https://www.medialiitto.fi/uutiset/yleisradion-rahoitus-tulee-ohjata-julkisen-palvelun-ydintehtavaan/>.

Misuse of state funds to influence media output

In Finland, the use of state funds to influence media output is not generally regarded as a concern or potential risk. Most state-funded content is distributed at regional and local levels, where municipalities use local media to disseminate official announcements. Some experts have suggested that this EMFA provision will mainly add administrative responsibilities for media outlets, with limited practical impact on media freedom.

Under the new act implementing EMFA, authorities, public bodies, and media service providers must notify the Finnish Transport and Communications Agency (Traficom) once information on state advertising has been published.

Legislation in line with EMFA provisions: Yes (as of 8 August 2025)²⁰

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.²¹ In the 2023-2024 period, the Government commissioned an academic analysis on media concentration and pluralism in Finland (published in March 2024).²² 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.

An interview study with Finnish news media professionals found that some stakeholders were cautious about EMFA's potential impact on media freedom. They noted that EMFA's main objective is to prevent media content from being instrumentalised for political purposes by authoritarian regimes. However, in their view, in established democracies with strong self-regulatory mechanisms, the effect could be the opposite: Some interviewees even warned that inadequate implementation might, in the worst case, create opportunities for the state and authorities to intervene more directly in media content.²³

Nonetheless, the new act supplementing Finnish legislation to comply with EMFA assigns Traficom the task of monitoring how media market concentration affects pluralism and editorial independence, while the amendment to the Act on Yle is intended to safeguard the editorial independence of public service media.

Legislation in line with EMFA provisions: Yes

Effective media pluralism: Yes

²⁰ In the Finnish context, this provision is not deemed relevant.

²¹ Media Pluralism Monitor 2024: Finland: <https://cadmus.eui.eu/handle/1814/77000>

²² Lehtisaari, 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. <https://trepo.tuni.fi/handle/10024/155804>

²³ Pöyhtäri, 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 (the Transport and Communications Agency, 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 30.²⁴

Traficom²⁵ is responsible for tasks related to market conditions and distribution, as defined in the Traficom Act.²⁶ In 2024, an amendment to the Act designated Traficom as the national regulatory authority for the Digital Services Act (DSA), and it also will oversee the compliance of EMFA.

In this role, Traficom will maintain a media ownership database to complement the information that companies are required, under EMFA, to publish on their own websites. It will also assess proposed media mergers in terms of diversity, editorial independence, and financial sustainability. When a merger or acquisition is notified, Traficom must publish a report or memorandum within 65 days assessing its impact—although this assessment will not itself block any transaction.

Additionally, Traficom will monitor state advertising and issue an annual report on the matter, with the first expected in 2026.²⁷ Regarding Yle, the new amendment to the Act assigns Traficom a financial supervisory role.²⁸

²⁴ It 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.”

²⁵ See more at <https://www.traficom.fi/en>.

²⁶ Act on the Finnish Transport and Communications Agency (23.11.2018/935), hereafter Traficom Act, see <https://www.finlex.fi/fi/laki/ajantasa/2018/20180935#L2P4>.

²⁷ Act on the Supervision of Media Markets 408/2025.

²⁸ Act Amending the Act on Yleisradio 412/2025.

The National Audiovisual Institute (KAVI)²⁹ is governed by the KAVI Act.³⁰ The Institute's Media Education and Audiovisual Programmes Department oversees compliance with the Act on Audiovisual Programmes³¹, 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).³²

The authorities are also bound by the general principles of good administration set out in the Administrative Procedure Act³³, 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 rules³⁴ which are set out in a separate decree.³⁵ The Director's term of office is five years.³⁶ The Civil Servants Act sets out the grounds for dismissal of civil servants.

The Director is supported by the Sanctions Committee at Traficom. The latter will impose agency sanctions when the amount in question exceeds €100,000.³⁷ 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.³⁸

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

²⁹ See more at <https://kavi.fi/en/>.

³⁰ Act on the National Audiovisual Institute (1434/2007), hereafter KAVI Act.

³¹ Act on Audiovisual Programmes (710/2011), hereafter Audiovisual Act, see <https://www.finlex.fi/fi/laki/kaannokset/2011/en20110710.pdf>.

³² See, e.g., AVMSD Database of the European Audiovisual Observatory: <https://avmsd.obs.coe.int/#art-30-6-finland>.

³³ Administrative Procedure Act (434/2003), see <https://www.finlex.fi/fi/laki/kaannokset/2003/en20030434.pdf>.

³⁴ Traficom Act, Art. 4.

³⁵ Decree by the Finnish Government (1183/2018), see <https://www.finlex.fi/fi/laki/alkup/2018/20181183>.

³⁶ Act on Public Officials in Central Government (750/1994), see <https://www.finlex.fi/en/laki/kaannokset/1994/en19940750>; and Decree on Public Officials in Central Government (971/1994), see <https://www.finlex.fi/en/laki/kaannokset/1994/en19940971>.

³⁷ It 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: <https://www.traficom.fi/en/news/penalty-fees-be-integrated-market-surveillance-vehicles-and-vehicle-parts>

³⁸ Government Decree on the National Audiovisual Institute (712/2013; in Finnish), Art. 3, see <https://www.finlex.fi/fi/laki/alkup/2013/20130712>.

Independence of the regulators' members

The current legal framework ensures the independence of the regulatory bodies. According to the Constitution³⁹, 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 Constitution⁴⁰ 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.

The National Audiovisual Institute (KAVI) is responsible⁴¹ for certain aspects of the implementation of the Audiovisual Media Services Directive (AVMSD), particularly in areas such as programme classification, archiving, media education, and promoting children's media literacy. However, KAVI will not have responsibilities related to the implementation of EMFA, which fall primarily under Traficom.

Traficom is responsible for addressing a range of issues including the management of the National Cyber Security Centre.⁴² The competencies and powers related to media activities are outlined in the Act 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;

³⁹ Constitution of Finland, see <https://www.finlex.fi/fi/laki/kaannokset/1999/en19990731.pdf>.

⁴⁰ Constitution of Finland, cit.

⁴¹ Kavi Act, cit.

⁴² See <https://traficom.fi/en/traficom/about-traficom/organisation>.

⁴³ Traficom Act, Art. 2.

- 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 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 PSM⁴⁴;
- 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.

In addition, Traficom has been tasked with overseeing and monitoring the implementation of the DSA as Finland's Digital Services Coordinator (DSC). Under the new Act, it also acts as the national regulatory authority referred to in Article 7 of EMFA and supervises compliance with the regulation.⁴⁵

Traficom is responsible for monitoring compliance with Article 6(1) of EMFA, which concerns information about ownership and state funding, and for developing national databases on media ownership and related information, as required under Article 6(2). To fulfil these duties, Traficom has the right to obtain any information necessary.

Media service providers must notify Traficom annually that the information required under Article 6(1) has been published. Similarly, authorities and other public bodies required to disclose information on state advertising under Article 25(2) must notify Traficom annually that this information has been published. Municipalities and joint municipal authorities must report information on state advertising to the State Treasury as part of the financial data reporting required under Section 120a of the Municipalities Act (410/2015).⁴⁶ Wellbeing services counties and joint county authorities must report the same information to the State Treasury under Section 120 of the Act on Wellbeing Services Counties (611/2021).⁴⁷

If a party violates EMFA or the new Act, Traficom may order it to cease the violation and correct the error or omission within a reasonable period. In cases of non-compliance,

⁴⁴ See: <https://traficom.fi/en/communications/tv-other-audiovisual-services-and-radio/government-grant-communication-and-news>

⁴⁵ Act on the Supervision of Media Markets 408/2025, Article 8: "Traficom acts as the national regulatory authority referred to in Article 7 of the Media Freedom Regulation and supervises compliance with this Act. In addition, it monitors compliance with Article 6(1) of the Media Freedom Regulation and develops the national databases on media ownership referred to in Article 6(2) of the Regulation."

⁴⁶ See, Municipalities Act (410/2015). <https://www.finlex.fi/api/media/statute-foreign-language-translation/81545/mainPdf/main.pdf?timestamp=2015-04-10T00%3A00%3A00.000Z>

⁴⁷ See, Act on Wellbeing Services Counties (611/2021). <https://finlex.fi/api/media/statute-foreign-language-translation/677607/mainPdf/main.pdf?timestamp=2025-06-19T10%3A12%3A06.000Z>

Traficom may impose a conditional fine in accordance with the Act on Conditional Fines (1113/1990).⁴⁸

Appeal mechanisms

An appeal against a Traficom supervisory decision may be lodged with the Market Court or the Supreme Administrative Court.⁴⁹

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 Board.⁵⁰ 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 Programmes⁵¹, 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).⁵²

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 is legally required to conduct a consultation process.⁵³ In 2024, the only appeal concerned rulings against Sanoma and Telia regarding their use of cookies on company websites. The appeal was rejected.⁵⁴

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

⁴⁸ See, Act on Conditional Fines (113/1990): <https://finlex.fi/en/legislation/translations/1990/eng/1113> and <http://data.finlex.fi/eli/sd/1990/1113/ajantasa/2025-06-27/fin>

⁴⁹ Act on Electronic Communications Services (917/2014), Chapter 43, see <https://www.finlex.fi/fi/laki/kaannokset/2014/en20140917.pdf>. 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.

⁵⁰ Audiovisual Law, cit.

⁵¹ Audiovisual Law, cit.

⁵² Administrative Judicial Procedure Act (586/1996), see <https://finlex.fi/en/laki/kaannokset/1996/19960586>.

⁵³ Act on Electronic Communications Services, Art. 310.

⁵⁴ See (in Finnish): <https://tuomioistuimet.fi/hallintooikeudet/helsinginhallinto-oikeus/fi/index/tiedotteet/2024/helsinginhallinto-oikeushylkasisanomamediafinlandoyntateliafinlandoyntajavalituksetliikenne-javiestintavirastotraficominevastekaytantojakoskeivistaapaatoksista.html>

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.⁵⁵

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.⁵⁶

Independence of public service media

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

Summary

In Finland, the central challenges and public debates surrounding public service media have focused on independence and funding. These issues are fundamental to EMFA and have been fiercely contested in recent years, both within the media industry and in political decision-making. Critics have argued that Yle should not receive preferential treatment in the context of government savings measures.

However, the underlying principle of EMFA is that public service media must receive special consideration in order to guarantee the autonomy of news and current affairs journalism. In particular, EMFA requires that funding arrangements ensure public service media providers have adequate, sustainable, and predictable financial resources that correspond to their public service remit and enable further development.⁵⁷

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. See below a few quotes from each:

Yle's CEO: *“Public service is seen in the regulation primarily from the perspective of 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”*⁵⁸

⁵⁵ Act on the Openness of Government Activities (621/1999), see https://www.finlex.fi/en/laki/kaannokset/1999/en19990621_20150907.pdf.

⁵⁶ More about the supervisory duties of the Chancellor of Justice, see: <https://oikeuskansleri.fi/en/supervision-of-the-activities-of-authorities>

⁵⁷ Martti Soramäki, 11 June 2024, presentation in a research workshop on Finnish media policy. Cited with the permission of the presenter.

⁵⁸ “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, see (in Finnish): <https://yle.fi/aihe/a/20-10006708>.

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.”⁵⁹

The above statement by the Federation reflects a longer history of complaints about unfair competitive advantage in many sectors, including the appropriateness and market impact of Yle’s text-based online content, personalization services, the streaming service, educational content, and audio services. One complaint to the EU resulted in the amendment of the Act on Yle in 2022 to limit its text-based news online⁶⁰ and the Federation has also complained about Yle’s educational content, resulting in the Federation suing the EU in February 2025.

In addition, although not directly related to EMFA, the future of Yle was the subject of intense political debate throughout 2024, particularly regarding proposals for heavy budget cuts and restrictions on parts of its remit, such as entertainment coverage. A parliamentary committee spent months searching for a compromise after heated discussions. Already in 2023, the government had established a parliamentary working group to rethink Yle’s remit and funding. Much of the criticism, driven by commercial competitors and political opponents, especially the populist right-wing Finns Party, centred on the perceived lack of transparency in Yle’s finances and spending.

After prolonged controversy, disagreements, and delays, the working group concluded its work in September 2024 with recommendations for significant funding cuts alongside “improvements in Yle’s openness.”⁶¹

The continuing debate on Yle, combined with the amendment to the Act on Yle, reflects a national approach to public service media that is, to some extent, at odds with the spirit of EMFA. It also highlights the broader challenges confronting the Finnish media welfare state.

Editorial and operational independence

The operations of Yle, the Finnish public service media, are primarily guided by the Act on Yle⁶², the Limited Liability Companies Act⁶³, and other relevant legislation pertaining to public broadcasting. It is the responsibility of Traficom to ensure that Yle’s operations are

⁵⁹ “Medianvapaussäädös ei pakota lihottamaan Yleisradiota” (The media freedom act does not force Yleisradio to gain weight), Finnish Media Federation, 24 May 2024, see (in Finnish): <https://www.medialiitto.fi/agendalla/medianvapaussaadoss-ei-pakota-lihottamaan-yleisradiota/>

⁶⁰ See, Ala-Fossi, M., Hildén, J. Horowitz, M., Karppinen, K., Neuvonen, R. & Nieminen, H. (2024). Public Service Media in the Crosshairs: National Policymaking Process, the EU Competition Regulation, and the Case of Yle’s Text-Based News Content. In A. D’Arma, M. Michalis, G.F.I. Lowe and M-B. Zita (eds.) Challenges and Developments in Public Service Journalism. Westminster University Press. <https://www.fulcrum.org/concern/monographs/2v23vx565#toc>

⁶¹ The parliamentary working group will cut Yle’s funding and enhance Yle’s transparency. Ministry of Transport and Communications See (in Finnish):

<https://lvm.fi/-/parlamentaarinen-yle-tyoryhma-vahentaa-ylen-rahoitusta-ja-edistaa-avoimuutta>

⁶² Yle Act.

⁶³ Limited Liability Companies Act (624/2006), see <https://www.finlex.fi/en/laki/kaannokset/2006/20060624>.

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 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 Finland⁶⁴ and its own ethical standards. Yle is a member of the Council for Mass Media in Finland.⁶⁵

The Act on Yle 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 insofar 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.⁶⁶

The new amendment to the Act on Yle addresses the governance bodies (Administrative Council and Board of Directors) as well as the role of the Editor-in-Chief. It introduces additional transparency and reporting requirements and assigns Yle an expanded public service role: to be prepared to provide television, radio, and other information dissemination in exceptional circumstances. The amendment also sets out Yle's reporting obligations to Traficom.⁶⁷

Legal provisions guaranteeing plurality of information

The Act on Yle 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.⁶⁸

⁶⁴ See more at <https://journalistiliitto.fi/en/>.

⁶⁵ See more at <https://jsn.fi/en/>.

⁶⁶ Act on the Exercise of Freedom of Expression in Mass Media (460/2003), see, <https://www.finlex.fi/en/laki/kaannokset/2003/en20030460.pdf>

⁶⁷ Act Amending the Act on Yleisradio 412/2025, Articles 5, 6, 7, 12.

⁶⁸ Yle Act, Chapter 3, Section 7.

Composition of the governing bodies

In line with the Act on Yle, 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.⁶⁹

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 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 recent additions to the Council's responsibilities include supervising the company's administration, providing the annual general meeting with its opinion on the financial statements and the auditor's report, and ensuring that funds allocated for public service provision are used transparently and efficiently.⁷⁰

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.⁷¹

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.

The new Act sets out the duties of the Board of Directors as follows:

- Appoint and dismiss the company's CEO, and determine the CEO's salary and other terms of employment (the CEO may not serve as a member of either the Supervisory Board or the Board of Directors).
- Appoint and dismiss other senior managers and determine their salaries and terms of employment.
- Appoint and dismiss the company's responsible editors and define their areas of responsibility.
- Approve the budget for the following year.
- Convene the general meeting and prepare the matters to be addressed.
- Submit an annual report on the company's operations to the Finnish Transport and Communications Agency (Traficom).⁷²

⁶⁹ Yle Act, Chapter 2, Section 5.

⁷⁰ Act Amending the Act on Yleisradio 412/2025

⁷¹ Yle Act, Chapter 2, Section 6c.

⁷² Act Amending the Act on Yleisradio 412/2025

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. 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.⁷³ 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.⁷⁴ 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

⁷³ Law concerning the public broadcasting tax, see <https://finlex.fi/fi/laki/ajantasa/2012/20120484>.

⁷⁴ Act on the State Television and Radio Fund (745/1998) https://www.finlex.fi/en/laki/kaannokset/1998/en19980745_20120475.pdf.

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.

Furthermore, the Ministry of Transport and Communications initiated a new procedure to amend the Yle Act⁷⁵, with the objective of "increasing the openness" of its operations.⁷⁶ 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 requires an amendment to the Act on the State Television and Radio Fund.⁷⁷

In practice, the funding cuts have led to "difficult decisions" concerning Yle's programming and around 300 lay-offs or equivalent reductions.⁷⁸ Notably, the government's broader austerity package across several sectors was overshadowed by debates portraying Yle as an opaque organisation where financial and editorial decisions are insufficiently disclosed to the public. This framing was made possible by the vague definition of transparency in Finnish media policy-making.⁷⁹

The decision to cut Yle's funding appears to be at odds with EMFA, which stipulates that public service media must be guaranteed adequate, sustainable, and predictable financial resources.

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,

⁷⁵ See, Ministry of Transport and Communications: Act on the Finnish Broadcasting Company to be amended to increase openness https://lvm.fi/-/yleisradiolakia-muutetaan-avoimuuden-lisaamiseksi?languageId=en_US.

⁷⁶ Ministry of Transport and Communications: Minister Ranne: Openness of Yle's operations and finances must be maximised through legislative amendments

<https://lvm.fi/en/-/minister-ranne-openness-of-yle-s-operations-and-finances-must-be-maximised-through-legislative-amendments>

⁷⁷ "Lausuntokierros: Ylen rahoitusta vuosittain nostava indeksi jäädytetään 2025–2027," cit.

⁷⁸ Helsinki Times (2024). YLE announces talks over as many as 375 redundancies.

<https://www.helsinkitimes.fi/business/25758-yle-announces-talks-over-as-many-as-375-redundancies.html>

⁷⁹ See, Van den Bulck, H., Horowitz, M. & Raats, T. (2025). Rethinking Transparency in Public Service Media: A Multidimensional Framework for Better Governance. Policy brief. Front. Commun., 30 June 2025. Sec. Media Governance and the Public Sphere. Volume 10 - 2025. <https://doi.org/10.3389/fcomm.2025.1569363>

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 the Act on Yle, and key requirements outlined in the AVMSD, as set out in the Act on Electronic Communications Services must be reported to Traficom.⁸⁰

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.⁸¹

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 Act on Yle 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.

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.⁸²

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.

⁸⁰ Yle Act, Art. 12.

⁸¹ See (in Finnish), e.g.: <https://yle.fi/aihe/yleisradio/vuosikertomukset>.

⁸² See, e.g., (in Finnish): <https://yle.fi/a/74-20167601>.

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, prior to EMFA, there were 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.⁸³ 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.⁸⁴ The Ministry of Education and Culture offers financial assistance to media outlets publishing in minority languages.⁸⁵ Some subsidies for audiovisual productions in Finland are provided by the innovation funding agency, Business Finland.⁸⁶ Additionally, Traficom oversees the administration of several temporary subsidies for news media and journalism initiatives (see below for details).

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.

⁸³ Ministry of Transport and Communication: Report on Media Support Impacts Published. <https://lvm.fi/en/-/report-on-media-support-impacts-published-1812235>

⁸⁴ Nordicom: Direct media subsidies to news media – a Nordic overview <https://www.nordicom.gu.se/en/facts-analysis/nordic/factsheets/direct-media-subsidies-news-media-nordic-overview>

⁸⁵ Government Decree on Support for the Press (389/2008), see <https://www.finlex.fi/fi/laki/ajantasa/2008/20080389>; see also (in Finnish): <https://okm.fi/-/valtakunnalliset-vahemmistokieliset-sanomalehdet-ja-sahkoiset-julkaisut>.

⁸⁶ Government Decree on the payment of compensation for audiovisual productions for 2024–2026 (1203/2023), see <https://www.finlex.fi/en/laki/kaannokset/2023/en20231203.pdf>.

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 feel that EMFA requires further work and imposes 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 platformisation⁸⁷, 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.”⁸⁸

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 Media⁸⁹ 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.

⁸⁷ Sirkkunen, Esa et al., 2021, cit.

⁸⁸ Lehtisaari, K. et al., 2024, cit.

⁸⁹ Ministry of Justice, Finland Act on the Exercise of Freedom of Expression in Mass Media.

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.⁹⁰ This is overseen by the Finnish Competition and Consumer Authority (FCCA).⁹¹

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 Office.⁹² 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 that was not present in any national law prior to implementation of EMFA.

National media ownership databases

There are currently no legal provisions in Finland requiring media regulators to maintain comprehensive national databases on media ownership. Under the new Act⁹³, however, Traficom is mandated to establish and maintain a national open database containing information on media ownership.

Assessment of media market concentrations

Besides competition regulation, before the EMFA, there were 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 concentration⁹⁴, 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

⁹⁰ Competition Act 948/2011, available at <https://finlex.fi/en/laki/kaannokset/2011/20110948>.

⁹¹ See <https://www.kkv.fi/en/>.

⁹² See more at <https://www.prh.fi/en/kaupparekisteri.html>.

⁹³ Act on the Supervision of Media Markets 408/2025.

⁹⁴ Lehtisaari, K. et al., 2024, cit.

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.⁹⁵

In alignment with EMFA, the new Act on the media market⁹⁶ stipulates the assessment of concentration of the national media market. The act stipulates a procedure for notification of a media merger. The notification must include:

- A statement of the total turnover generated in Finland by each party to the merger and by the entities and foundations belonging to the same group of undertakings
- A description of the merger and its financial and funding structure, timetable, the business subject to the arrangement, any possible seller, the ownership and control structure before and after the arrangement, the financial and other factors leading to the arrangement, as well as the strategic and economic rationale for the arrangement
- A description of the industry sector of each party to the merger, their business operations, and activities carried out under a programme licence
- A statement on the markets affected by the merger
- A description of other actors operating in the market and their market shares
- An assessment of the expected impact of the merger on media pluralism, the formation of public opinion, and the diversity of media services and media supply in the market
- A description of safeguards related to editorial independence

Any information in the notification and its appendices that is to be treated as confidential under the Act on the Openness of Government Activities (621/1999) or any other law must be specifically identified.

The notification must be submitted to Traficom. It must, in turn, conduct assessment of the effects of the merger and provide it to the parties to the merger within 65 working days of receiving the notification. The assessment must also be made publicly available.

As noted, the new act on monitoring the media market has assigned Traficom the task of assessing how media market concentrations exceeding the turnover limits laid down in the Competition Act affect media pluralism and editorial independence. An assessment by Traficom indicating a serious curtailment of media pluralism and/or editorial independence could send a strong signal but would not, in itself, prevent corporate acquisitions from taking place. It is estimated that Traficom would assess a small number of acquisitions every year.

⁹⁵ Confederation of Finnish Industries, EK 2002. Ohje kilpailulainsäädännön noudattamisesta . https://ek.fi/wp-content/uploads/2022/04/Ohje-kilpailulainsa%CC%88a%CC%88da%CC%88nno%CC%88n-noudattamisesta-2022_EK.pdf

⁹⁶ Act on the Supervision of Media Markets 408/2025.

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 decisions⁹⁷ 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.⁹⁸

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.⁹⁹

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.

⁹⁷ Lehtisaari, K. et al., 2024, cit.

⁹⁸ Lehtisaari, K. et al., 2024, cit.

⁹⁹ Lehtisaari, K. et al., 2024, cit.

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.

Recommendations

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. 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 focus on:

- a) *National legislation that has come to force to align with the EMFA's general provisions; and*
- b) *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 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

The process of aligning Finland's national legislation with EMFA started in October 2025. To this end, a new Act on the Supervision of Media Markets was introduced, alongside several amendments to existing laws. These measures ensure compliance with EMFA while avoiding any expansion of regulation beyond its core provisions. The only exception is the reform of the Act on Yleisradio, which brought in additional transparency obligations for public service media.

Further enhancing the media environment

In Finland, the independence of media regulators is firmly established. In recent years, however, the country has faced a significant increase in EU regulations and new administrative responsibilities, which have created challenges in terms of resource allocation. Since no direct threats to regulatory independence have emerged so far, the main recommendations concern the role of legislation and the additional workload that EMFA places on regulators. Finland's regulatory approach to the media sector has traditionally been characterised by a light-touch philosophy, aimed at avoiding unnecessary burdens. This principle should continue to guide implementation 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 European Commission provides clear guidance to Member States and their regulators on specific regulations and expectations.
- Traficom has a central role both as the Digital Service Coordinator of Finland to help the European Commission to monitor and enforce obligations in the Digital Services Act (DSA). With the implementation and monitoring of EMFA, it now has additional duties but not additional resources. This may be a challenge especially regarding Traficom's possibilities for proactive participation in the work of The European Board for Media Services (the Media Board, EBMS). More resources should be allocated to ensure that Traficom has adequate capacity to effectively fulfil its expanded responsibilities under EMFA and to enable proactive participation in the European Board for Media Services.

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

The right-wing government's parliamentary working group proposed a three-year freeze (2025–2027) on Yle's funding index. In response, Yle announced organisational streamlining and cost-saving measures. At the same time, the Act on Yle was amended not only to ensure compliance with the EMFA but also to strengthen Yle's transparency obligations. Amid these developments, commercial media continued to criticise Yle's remit and funding.

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

- The role of the new Administrative Council elected by Parliament should be defined in detail 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. When transparency is used as a generic principle, without clear definitions and demands, it can become a meaningless buzzword or even a "Trojan Horse" that is used for political or related purposes.¹⁰⁰

Further enhancing the media environment: what is needed?

The ongoing debate around Yle, marked by political attacks and negative coverage from commercial media, together with new policy processes, highlights the significant challenges confronting Finland's media welfare state. While EMFA does not take a detailed position on the scope of the public service mandate or funding levels, nor alter the application of EU state aid rules to public service broadcasting, its principles can nevertheless support and guide the comprehensive national debates needed on the remit of Finnish public service media and the resources required to sustain it.

At the same time, it is essential to consider the vitality of the entire national media ecosystem and to manage the competing roles and interests of public service and commercial media. In particular, the debate should also address the rise of global platforms, the challenges they pose for national outlets, and the ways in which EMFA, alongside the DSA, can help protect media pluralism in this evolving 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.

¹⁰⁰ Van den Bulk, H. et al., 2025, cit.

Aligning with EMFA's general provisions

As of 8 August 2025, the legislation is in compliance with EMFA. The authorities, public bodies and media service providers will be required to notify Traficom once the information on state advertising has been published. Traficom will summarize the findings in an annual report, the first one to be published in 2026. This will fulfil the requirements set out by EMFA.

Further enhancing the media environment

Given the minor role of state and municipal-funded public advertising there is no need for further enhanced rules on reporting.

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 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

As per the new Act on the supervision of markets, Traficom is responsible for assessing any merger for its impact on media concentration, media pluralism and editorial independence. Some experts, however, caution that the new EMFA provision could impose unnecessary bureaucratic burdens on small local and regional media outlets. Additionally, although in compliance with EMFA, Traficom's reports on potential impact in the media sector cannot ultimately prevent a merger or acquisition.

Further enhancing the media environment: what is needed?

In Finland, media concentration remains a complex issue. On the one hand, increasing concentration can weaken media pluralism; on the other, mergers and acquisitions may help sustain small local or regional outlets. Media concentration has clearly been on the policy agenda in recent years, exemplified by the thorough academic analysis commissioned by the government in 2024. Looking ahead, given the small and complex nature of the Finnish media market, the monitoring and assessment of media pluralism should go beyond EMFA's provisions and include a more multidimensional approach.

A transparent and replicable methodology for measuring media pluralism, editorial independence, and sustainability should be developed to ensure a consistent approach to

merger assessments, in line with the criteria set out in the EMFA. The Finnish media sector is relatively concentrated, which poses certain risks; at the same time, consolidation can also provide a lifeline for smaller regional outlets struggling to survive in the market.

Against this backdrop, further consideration should be given to the following issues:

- **Regional-level analysis:** Assessing the risks of concentration at the regional level, not only nationally.
- **Role of the Editor-in-Chief:** Given the importance of this position in both journalistic culture and legislation, evaluations of media pluralism should take into account the positive influence of editors-in-chief, as well as the effectiveness of safeguards for editorial independence within titles owned by the same media group.
- **Content diversity:** Media pluralism methodologies should also incorporate content analysis to evaluate the range and variety of output across different media outlets.

A further challenge is the absence of reliable consumption data. Statistics Finland¹⁰¹, the national statistical institute, no longer produces media consumption statistics. This gap makes it difficult to contextualise EMFA's stipulations and assess their impact. It is therefore paramount to restore media, culture, and technology-use statistics as part of the institute's remit, providing an essential evidence base for evaluating the effects of EMFA in Finland.

¹⁰¹ See more at <https://stat.fi/en>.

MEDIA CAPTURE MONITORING REPORT: FINLAND

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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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