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Abstract

Ever since the launch of the World Press Freedom Index almost 20 years ago, Finland has always been among the top five countries of that index. According to the annual Reuters Digital News reports, Finnish people also have the highest level of trust in the news media and one of the highest levels of press readership in the EU. Most of the media companies are doing quite well, while Google and Facebook have a much less dominant role in the advertising market than elsewhere in Europe. In this context, you might expect Finland to have a comprehensive and visionary media and communications policy to support democracy. However, our meta-study of Finnish media and communications policy based on two recent reports

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to the Ministry of Transport and Communications, other earlier studies, along with official documents as well as statistical data suggests that is not the case. Our analysis shows that most decisions have been pragmatic *ad hoc* solutions serving economic interests rather than any specific media and communication policy goals. A closer examination also proves that Finland does not fit into the Nordic Media Welfare State model either, despite a long, shared history and cultural ties.

Keywords: Media Policy, Regulation, State Support, News Media, Finland

Introduction

Ever since the launch of the World Press Freedom Index almost 20 years ago, Finland has always been among the top five countries of the index. It has had the highest ranking in the world twelve times, beating all its Nordic neighbours except Norway (Reporters without Borders, 2021). According to annual Reuters Digital News reports, Finnish people also have the highest level of trust in the news media and one of the highest levels of press readership in the EU (Newman et al., 2021, p. 9; Reunanen, 2021, pp. 8–11, 46–47). Most of the media companies in the happiest country of the world (State of the Planet, 2021) are doing quite well, while Google and Facebook have a much less dominant role in the advertising market than elsewhere in Europe.

In this context, you might expect Finland to have a comprehensive and visionary media and communications policy to support democracy and media freedom. However, our meta-study of Finnish media and communications policy based on two recent reports for the Ministry of Transport and Communications, other earlier studies, along with official documents as well as statistical data suggests that is not the case. Our analysis shows that most decisions have been pragmatic *ad hoc* solutions serving economic interests rather than any specific media and communication policy goals. A closer examination also proves that Finland does not fit into the Nordic Media Welfare State model either (Ala-Fossi, 2020), despite a long, shared history and cultural ties.

The term “Media Welfare State” is a concept used to characterise traditional features of the Nordic countries’ media systems. The distinct principles and features of media policies in this model have included the understanding of communication services as universal public goods, institutionalised editorial freedom, cultural policy extending to the media, and a tendency to choose consensual policy solutions that involve

cooperation between both public and private stakeholders (Syvertsen et al., 2014).

Despite being commonly associated with this model, we argue that media policy in Finland is increasingly characterised by selective deregulation and policymaking that is increasingly based solely on competition legislation, as a result of which, the media are considered equal to other goods and services.

This article is divided into three main sections. After an overview of the present-day media landscape in Finland and the existing legislation on media ownership and competition, we analyse the development of public support and regulation of the Finnish news media in the last two decades. Based on the long-term social importance as well as the amount of public support granted, our analysis focuses on the printed press and electronic media sector, especially television broadcasting. In the final section, we discuss the special characteristics and outcomes of the Finnish media policy.

Current Media Business Landscape

Finland is a small and sparsely populated country with its 5.5 million inhabitants and land area of 304,000 square kilometres. The country has two official languages: Finnish (86.9% of population) and Swedish (5.2%). The native Sámi is recognised as a minority language while the most common foreign languages include Russian (1.5%) and Estonian (0.9%). Politically, Finland has been described as a stable Nordic country with three major parties ruling the scene in turn, the centre-left Social Democratic Party, the centre-right National Coalition Party, and the centrist Center Party, while smaller parties typically alternate in government coalitions. However, in 2011 general elections nationalist Finns Party broke this traditional hegemony and displaced Center Party from the top three. Finland's current government, led by Prime Minister Sanna Marin (SDP), is a centre-left, liberal coalition of five parties holding 117 of the parliament's 200 seats.

Volume of the market

Although a welfare country in media consumption, during the 2010s the total volume of the mass media market in Finland both rose and fell, ending at around €3.9 billion in 2019. Despite slight growth in the late 2010s, the total volume was, even before the COVID-19 pandemic, still slightly lower than at the beginning of the decade and the share of the mass media of the GDP had fallen from 2.1% to around 1.6%. When assessing the development of the mass media as a whole, it is necessary to observe

that there are significant differences in developments in the various sub-industries of the media. Electronic media has grown significantly while the volume of print publishing has declined constantly (Björkroth, Grönlund, 2015; Ala-Fossi et al., 2018; Ala-Fossi et al., 2020).

According to the data provided by Statistics Finland (Statistics Finland, 2021, table 1.7.), the total number of companies in mass media industries increased during the 2010s by just over a tenth from 2,830 to 3,143 companies in 2019. During the same period, the number of publishing companies fell by 11% and the number of paid-for daily newspaper titles declined by almost one third from 52 to 36. The decrease in the number of titles is due to both abolitions, mergers with other newspaper titles, and a reduction of the number of weekly issues. Despite uncertain business prospects, the number of nationwide free-to-air television channels has risen from 13 to 22 and paid channels from 9 to 38, whereas the number of radio channels with nationwide distribution has increased from 16 to 26 (Ala-Fossi et al., 2020, pp. 83–90).

Because of staff reductions in the publishing industries in the 2010s, the employed labour force in newspaper, magazine, and news agencies has, according to the Statistics Finland (Statistics Finland, 2021, figure 1.14.), fallen by one-third to less than 9,000 employees. Due to redundancies and continuous employee co-operation negotiations, the total number of employees in news media is expected to continue to decline. The development curve of the total number of personnel in radio and television has also clearly declined in the 2010s and the total number of employees has dropped by 15% to approximately 4,400.

The fast spread of ICT and, according to Lehtisaari et al. (2012), the rise of the Internet, the digitalisation of information and the dissipation of boundaries between media platforms, convergence changes the socioeconomic field in which newspaper publishers operate. Ala-Fossi (et al., 2020, p. 112) have stated that, in Finland, digital distribution platforms have gained popularity while traditional distribution channels have lost ground. Some researchers have found a so-called “disruptive” development in the Finnish publishing industry (Södergård, Bäck, Koironen, 2016), whereas other sectors of the media industry have survived the digital turn better. Changes in media usage has affected both the advertising and marketing communications more broadly. At the same time, the emergence of a free-of-charge online news supply has affected people’s willingness to pay for journalistic content (Grönlund, Björkroth, 2011, p. 26) and, according to the Reuters Institute Digital News Report’s country report of Finland, one fifth (20%) of Finns paid for online news in 2021 (Reunanen, 2021, pp. 24–25).

Ad revenues and print media decreasing

Finnish news media is still significantly dependent on advertising revenues from their printed editions and therefore it is quite sensitive to changes in the amount and targeting of advertising (Ala-Fossi et al., 2020, pp. 18–19; Grönlund, 2014, pp. 37–40). In addition, local free sheets are completely dependent on print advertising, as it is their only source of revenue. The growth in media advertising was quite moderate during the 2010s and, in 2020, due to a drop caused by COVID-19 pandemic, it was approximately at about the same level as at the turn of the Millennium, i.e., at €1.1 billion. The share of media advertising of GDP has dropped markedly from 0.8% to approximately 0.5%. In a broader perspective, the redistribution of all marketing communications efforts is one of the key forces that change the business environment of all media companies (Ala-Fossi et al., 2020, p. 19; Grönlund, 2014, p. 39.) At the same time, consumer payments increased in importance, a trend most visible in the audiovisual sector wherein paid channels and over-the-top streaming services are gaining ground. During the last decade, the share of subscription sales for daily newspapers rocketed from 46% to 67%, reflecting a corresponding drop in advertising sales (Hellman, 2021, pp. 104–105).

In the 2010s, printed newspapers' share of total media dropped substantially from more than one-third (38%) to distinctly less than one-fifth (16%). Despite this development, most provincial newspapers, and especially local newspapers, are still significantly dependent on advertising and circulation revenues from their printed edition. Online advertising has instead continued to grow strongly and its share of total media advertising in 2020 was already almost half (47%). Statistics by the Finnish Advertising Council and Kantar TNS indicate that two major international players, namely Google and Facebook, collect the majority of digital advertising revenue. In 2020, social media and search engine advertising accounted for almost two-thirds (63%) of all digital advertising (Statistics Finland, 2021, table 1.4.)

More than half of media use online

Finns spend quite a lot of time following the media and, according to a TNS Atlas Intermedia study, in 2019, Finns aged 15–69 spent more than eight hours a day watching, listening to or reading different media. Finns spent more than seven times more time following electronic media than on printed media. The Internet alone, including newspaper and magazine online services, social media, music, and movie streaming services, accounts for half (50%) of all media usage. By comparison, the share

of print newspaper reading is only 20 minutes per day (4%) (Statistics Finland, 2021, table 1.19.)

According to the *Use of Information and Communications Technology by Individuals* study (Statistics Finland, 2020), Finns are avid users of information and communications technology. For example, four-fifths of the population (aged 16 to 89) used the Internet several times a day and Finns use it regularly for communication, including following the media, shopping, and everyday tasks. Online newspapers and television companies' news pages are among the most frequently followed media. In 2020, Facebook (58%) was the most commonly used social network service, followed by WhatsApp (50%), and then Instagram (39%). Young people used WhatsApp more often than Facebook but in older age groups the situation was the opposite (Statistics Finland, 2021, table 1.18.).

Competition Law and Media Consolidation

The deregulatory tendency mentioned above can be seen in the policies, or, better still, the lack of policy concerning media ownership. Within the last decades, the Finnish mass media markets have become highly concentrated for at least three reasons. Firstly, foreign investments used to be strictly limited in Finland but, since the 1990s, the Finnish media policy has not actively aimed at preventing acquisitions or consolidation with any ownership limitations or regulations. Secondly, it is likely that at least indirect tax subsidies favouring the largest newspapers may have even accelerated ownership concentration of the newspapers. And finally, there is no special competition legislation for media to prevent ownership concentration or to protect diversity of ownership.

Media consolidation and concentration constitute a challenging issue for media policy. Firms tend to pursue competitive advantages, such as market leadership and economies of scale, which often favours and leads to consolidation. While concentration may strengthen the emergent firm and consolidate industry as a whole, media policy research sees concentration also as a threat both to the market and democracy. Firstly, economic concentration may hinder the effective operation of the market and decrease consumer welfare. Secondly, a concentration of ownership may lessen the diversity of ideas and media content and arm major media with monopoly power to dictate news agendas and frames, thus suppressing the democratic process. (Harcourt, Picard, 2009, pp. 3–5; Just, 2009, pp. 97–99.)

In Finland, newspapers, radio, and television are all heavily concentrated media sectors. The highest degree of concentration is in radio

broadcasting, which is dominated by three key players, while the lowest concentration, at the national level, is in the press (Ala-Fossi et al., 2020, pp. 110–111; Manninen, Hjerpe, 2021, p. 10). However, it is newspaper publishing that is presently characterised by frequent mergers and shows the briskest pace of consolidation. In 2021, almost a third (30%) of all member publications, both newspapers and local free sheets, of the News Media Finland (NMF), belonged to the Keskiuomalainen Group. When measured by the number of titles, the five largest newspaper groups own more than half (57%) of all member titles of the NMF, with the ten biggest groups owning two-thirds (68%). Between 2010 and 2020, the CR3 figure, expressing the net sales-based market share of the top three newspaper houses nationally, went up from 0.51 to 0.65 (Ala-Fossi et al., 2020, p. 92; Hellman, 2021, pp. 106–109.) At the same time, most of the remaining regional newspapers have reached a monopoly-like position in their markets, as they own the majority if not all the local papers and even free sheets in the surrounding area (Hellman, 2022). This means that, although Finland is sparsely inhabited, there are practically no “news deserts” even in the northernmost parts of the country (Virranta, 2021). So far, there is no systematic research on the impact of consolidation on newspaper content. However, incidental knowledge suggests a dramatically increased recycling of articles and content syndication, thus lending support to earlier results from, e.g., Belgium and Norway (Hendrickx, Ranaivoson, 2021; Sjøvaag, 2014). Big media companies have effectively concentrated the administration, sales, as well as printing and journalistic content production of their papers, resulting in, on one hand, less diversity and fewer jobs, but many local brands in the corporate portfolio on the other.

Finland does not have separate competition legislation concerning the media, but the media is regulated within the framework of general competition legislation. According to the Competition Act and EU competition rules, the activities of companies must not restrict competition and companies may not take part in a cartel, excessively restrict contractual partner’s activities or abuse its dominant market position. In Finland, the Finnish Competition and Consumer Authority (FCCA) monitors competition law compliance and, according to the Competition Act, major company acquisitions in excess of a certain level of turnover must be reported to the FCCA. Acquisitions that are subject to notification may not be implemented before the approval of the authority. The FCCA will prohibit company acquisition if it significantly prevents competition in the market, i.e., creating a dominant position in the market or reinforcing an existing dominant position. In addition to prohibiting the acquisition, the FCCA can also impose conditions on the acquisition.

Effective economic competition includes the freedom of undertakings, within the boundaries of legislation, to enter the market and the right to freely determine its conduct and means of competition. In addition, consumers must be able to choose the options that they prefer. Effective competition encourages market participants to continue to operate along with the development of new products and services. Many newspaper publishers have responded to the challenges of media market changes by expanding to other media or new business areas to strengthen their market position and revenue base (Grönlund, Björkroth, 2011, pp. 719–720). While the newspaper industry is dominated by traditional, domestic newspaper publishers, the broadcasting sector is, since digitisation in the early 2000s, characterised by a growing number of domestic and international players that have launched a growing number of channels and other audio or audiovisual services. There have been a lot of mergers, concentration, and consolidation in the media industry over the last couple of decades. In 2020, Sanoma Corporation was, in terms of turnover, by far the largest media company in Finland. The second largest media company was the public broadcaster Yleisradio Oy (Yle) followed by Otava Oy, Alma Media Oyj and Keski-suomalainen Oyj (Statistics Finland, 2021, table 1.6.).

Between 2000 and 2021, the FCCA considered its decisions as regards approximately 30 media company related acquisitions. Almost all of them were approved as such, and only a few of the decisions were directly related to the news media. During the same period, the FCCA made approximately twenty other decisions, mostly related to suspected abuses of dominant positions, concerning media companies. In addition, Kärkimedia Oy (among others) was granted an exemption for cooperation in newspaper advertising marketing. In a small market such as Finland, there is a tendency to favour the growth and competitiveness of viable, incumbent media companies. The rationale is that the consolidation of firms consolidates the whole industry, and, as a result of which, a small circle of powerful owners control the industry (Trappel, 2011, pp. 121–125).

Print Media Subsidies and Support

High rates of newspaper circulation as well as a high reach of printed newspapers with long-term subscriptions were characteristic for Nordic media markets for decades (Hallin, Mancini, 2004). In Finland, the separateness of the Finnish language also protected the sector from foreign competition (Södergård, Bäck, Koironen, 2016, p. 16). Newspapers were considered such important media that, after WWII, they were given

reduced or zero rates of value-added tax (VAT) and, since the 1960's, states have also directed press subsidies to protect regional and political diversity. Even today, this is the core of the press subsidy system in Scandinavian countries, but not, however, in Finland. As a consequence of a deep fiscal crisis of the state in the 1990s, direct press subsidies were abandoned almost completely. Two decades later, the traditional zero-rate VAT of newspapers was replaced with a less expensive tax reduction for exactly similar reasons (Ala-Fossi, 2020, pp. 139–140).

Press subsidies and other forms of financial support represent a positive policy effort to secure the viability and versatile content of the media. The traditional Nordic system of press subsidies is designed to support media diversity and the plurality of opinions. For this aim, it is based on a combination of direct support for selected titles in need and indirect tax support in the form of reduced or zero-rate VAT for newspapers and magazines. Various press subsidies were provided throughout the second half of the twentieth century and a study by Picard and Grönlund (2003) shows that support rose significantly in the 1970s and 1980s.

Based on a governmental inquiry into newspaper mortality and its causes, the Finnish parliament decided to launch selective subsidies, along with a parliamentary press subsidy based on parliamentary representation in 1971. Moreover, beginning around 1980, new types of direct press support were allocated for news agencies, opinion and religious journals, and joint newspaper distribution systems. During the 1991–1993 economic depression, parliament heavily cut state spending. The indirect support for newspaper delivery through the postal system was abolished already in 1995, while direct subsidies were gradually decreased and never restored to their former level despite an economic recovery and the subsequently increased strength of the national economy. Both selective and parliamentary press subsidies were last distributed in 2007 (Ala-Fossi, 2020, pp. 113–114).

However, political parties still have the option to support their constituents through general party subsidies but, during the 2010s, most of the party-affiliated newspapers were either cancelled or became weeklies, monthlies, or went online. In addition, from the beginning of 2012, VAT rate on newspaper and magazine subscriptions was increased from the zero rate to a reduced rate of 9%, which was increased to 10% from the beginning of 2013. All the abovementioned decisions have officially been aimed to relieve a sudden and deep fiscal crisis of the state with no publicly expressed media policy goals.

Based on annual calculations from the VATT Institute for Economic Research – which operates in the administrative domain of the Ministry

of Finance, the cumulative benefit of tax support for newspapers and magazines was around €3 billion in the 2000s, and still around €1.5 billion in the 2010s. According to the VATT Institute, in 2020, the benefit of the abovementioned tax subsidy was estimated to be approximately €125 million (Ala-Fossi et al., 2020, p. 12).

While the direct press subsidies had always been much smaller than indirect tax support, abandoning them was fatal only for so-called “second” and “third” newspapers in competitive markets. In addition, the remaining indirect support favoured big papers with the largest circulations. This, in turn, accelerated a series of acquisitions and ownership concentration of Finnish newspapers. As a result, the Finnish newspaper publishing industry is now highly consolidated. In terms of reach and readership, the overall dominance of the few national newspapers, such as the popular *Ilta-Sanomat* and *Iltaalehti* but also the more serious *Helsingin Sanomat*, has been accentuated (Media Audit Finland, 2021).

A newer form of aid is media innovation support (2015–2018), whose original aim was to help the media industry to survive the ongoing change in the field and develop new, growing, international business. Innovation support was targeted primarily at companies already operating in the media sector. However, support was also granted to non-media companies if they were considered being able to help media companies in their restructuring. Business Finland, an innovation-funding, trade-and-investment-promotion organisation, fully owned by the Finnish Government, coordinated and granted media innovation support and it was possible to apply for funding to, *inter alia*, product and service development, new business model creation etc.

From 2015 to 2018, the total amount of media innovation support was approximately €29.4 million and 119 actors distributed it among 147 projects. The amount of funding for individual projects ranged from somewhere over €22,500 to almost €3.7 million (Ala-Fossi et al., 2018, pp. 228–230). Funding was granted especially to small and newly-established companies and the average project size was 149,000 euros (4Front, Gaia Consulting, 2018). A significant part of the allocated funding, 35%, went to software companies and only 22% to publishing or radio and television programming companies (Ala-Fossi et al., 2018, pp. 228–230). Although the media innovation support was spread broadly, it hardly changed the structural dominance of the major firms in the industry; the criteria for the support emphasised international business development, thus not favouring smaller regional companies or traditional media.

COVID-19 pandemic support

The exceptional situation that began in the spring of 2020 created challenges for the economy, which led to the creation of a number of financial subsidies for companies. The support system was set up very quickly in some cases and there have been several subsidies, all with different requirements, conditions, and reporting. For example, media companies have been able to apply for at least three different types of support from different sources and authorities. Our calculations of the amounts and distribution of the various COVID-19 support received by the media companies are based on published financing decisions of the Finnish Transport and Communications Agency Traficom, the State Treasury, and Business Finland.

In June 2020, the Ministry of Transport and Communications set up a working group of media representatives and experts to assist in the preparation of a temporary state grant to support journalism because of the difficulties created by COVID-19. During the consultation period, it was proposed that an independent media support board be appointed for awarding aid. However, this was abandoned as it was decided that aid would be distributed to all eligible companies. The criteria were primarily economic, and no content assessment was implemented. The COVID-19 pandemic support was available in autumn 2020 for media operating in Finland, whose advertising sales and turnover have decreased significantly due to the coronavirus epidemic and which met other conditions for receiving support. The amount of support was €7.5 million and the purpose of this state grant was to support the production of journalistic content. In total, 121 media companies applied for the grant from the Finnish Transport and Communications Agency Traficom. The grant was awarded to 97 companies that had applied for support for 236 media outlets. The maximum amount of grant was €800,000 per company (group of companies). According to Traficom, the amount of the grant per editorial person was approximately €3,700 for companies other than those where compliance with the abovementioned ceiling of €800,000 affects the final amount of aid granted. The majority of supported media outlets were newspapers (75%) and magazines (17%). The twelve largest beneficiaries accounted for three quarters (77%) of the total amount of COVID-19 support. The largest beneficiaries of the support were among Finland's largest media companies, such as Alma Media Oyj, Kaleva Oy, TS-Yhtymä Oy, and Keskisuomalainen Oyj. The remaining support, (23%), was distributed to 85 media companies.

The State Treasury's business cost support was intended for companies whose turnover has fallen significantly because of the COVID-19 pandemic. The aim of the cost support was to assist businesses in difficult situations caused by the COVID-19 pandemic and to reduce the number of companies going bankrupt by giving them more time to adjust their activities and costs during the Covid crisis. The support was granted based on actual costs and the decline in company turnover. The first application round started in summer 2020 and the application period for the fourth round of the cost support ended on 30th of September 2021. During the four application rounds, a total of around €1 million in cost support was granted to 27 publishing companies. Of the companies that received cost support, seven were news media companies which received a total of just over €120,000.

In addition, Business Finland, in the spring of 2020, launched a new financial service aimed at mitigating the COVID-19 pandemic economic. This funding was allocated for small and medium-sized enterprises (SMEs) and midcap companies operating in Finland, whose businesses were suffering as a result of the COVID-19 pandemic. The beneficiary could also be a purely domestic company, which does not meet Business Finland's normal internationalisation criteria. In total, approximately €6.8 million was granted for 102 publishing companies. Among them were 26 news media companies, which received a total of just over €1.9 million in funding.

The COVID-19 pandemic support for media did not clearly express longer-term media policy goals. The purpose of the support was to compensate for the decline in advertising revenues of news media companies caused by the pandemic. The distribution mechanism for the support was mechanistic and the criteria for support as simple as possible. Therefore, it led to the expected outcome in a concentrated market and, despite the large number of beneficiaries, most of the aid went to the largest media companies.

Other News Media Support and Regulation

Public broadcasting and marketisation

State-aid channelled to a public broadcaster in order to secure a sufficient public service media provision is yet another positive media policy measure applied by most European countries but is particularly characteristic of the Nordic model (Syvertsen et al., 2014, pp. 71–95). When the pan-European tidal wave of deregulation ran high in the 1980s, Finland chose a balancing strategy, which, at the same time, aimed at consolidating the public broadcasting company Yle and paving the

way for new, commercial entries (Svendsen, 2011, pp. 136–140). Local, commercial radio stations were first allowed in 1985 and, in 1997, the first nationwide commercial radio station was launched, while the local stations were given increasingly free rein to form into so-called ‘station chains’ (Ala-Fossi, 2005, pp. 167–214). As for television, Finland, as is tradition, applied an individual model of semi-commercialism with private, commercial company MTV collaborating with Yle within a shared channel system. In 1993, MTV was granted a channel of its own, MTV3, and, in 1997, another rival, Nelonen, controlled by Sanoma, was launched. This established a dual industry structure with 40–50% of the broadcasting market being controlled by Yle and the rest by two or three major commercial chains (Hellman, 1999, pp. 199–213).

Although Yle’s status was strengthened by 1993’s enacting of a new Act on Yle, which defined its public service duties and granted the company a special, privileged status (Laki Yleisradiosta, 1993), further legislation in 1998 (Laki televisio- ja radiotoiminnasta, 1998) and 2003 (Viestintämarkkinalaki, 2003) cemented the new dual structure and opened up the gates for a growing number of commercial rivals to enter the market. Technically, this was enabled by the digitisation of television broadcasting, carried out progressively between 2001 and 2009. Research has shown how digitisation accelerated marketisation and favoured major, incumbent domestic players, such as Sanoma and MTV, by letting them launch new channels while also allowing some international firms, such as Discovery, Canal+, and Disney, to corner the Finnish market and leaving Yle more exposed to competition (Hellman, 2010; Jääsaari, 2007). Of course, digitisation helped the public broadcaster to expand its services, but it also made it the engine of the transition and the one to foot the bill. The company was given a leading role on the digitisation path, but it was also decided that no additional public funding for this task would be provided. Yle, as a result, was forced to divest and sell its nationwide broadcast network infrastructure to finance the digitisation of television (Soramäki, 2017). The new infrastructure company, Digita, was sold first to Télédiffusion de France (TDF) in 1999, but the ownership of the Finnish broadcast networks has since changed several times. In 2018, First State Investments sold Digita to Digital Colony, a firm based in the United States (Ala-Fossi, 2020, pp. 136–137).

Dispute over Yle’s funding and remit

Finland was one of the first Nordic countries to abandon the traditional receiver-based licence-fee model in 2013, replacing it with a new, tax-based system. Today, state-aid of approximately €540 million per year

allocated to Yle represents the largest annual amount of public funding for the production of news and journalistic content. The earmarked Yle tax itself is debatable for a loud minority that claims not to need or use Yle's services but, in particular, it is the sheer magnitude of funding that has given rise to a permanent confrontation between Yle and the Finnish Media Federation which represents the private media and printing industries. As the present media policy rationale aims desperately at balancing between the conflicting interests, policymakers have become increasingly sensitive to critical claims by the commercial media that Yle is being financed too generously, enabling it to spread out too widely and disturb the market.

Yle was facing a deepening financial crisis already before the worldwide economic crisis hit the media industry in 2009. The licence-fee model had served well with few updates for decades but since 2003, the numbers as well as earnings started to decrease. The sharpest drop came in 2007 after the digital switch-over of television. The system generated less and less income even after the price of the licence was repeatedly raised (Ala-Fossi, 2012). The public funding of national broadcasters have special protection in the EU, but in practice the foundation of Yle's funding was falling into pieces at the same time the broadcaster had extra expenses caused by digitisation, and it was also developing new internet-based public services like Yle Areena (2007), the company's audio/video-on-demand platform. The only way out of the crisis was to develop a new funding system, which turned out to be a politically difficult process.

In the 1990s, major newspaper publishers in Finland had, at first, serious doubts about the importance of the Internet, partly because of their previous, less-successful new media projects. This gave Yle a head start in developing new Finnish Internet-based online services for general audiences (Lindblom, 2009, pp. 233–234). When the publishing companies finally realised what had happened and how important a media platform the Internet was becoming, they started to openly demand the exclusion of Yle outside the Internet. However, as soon as the Ministry of Transport and Communications nominated a parliamentary working group to prepare a new funding system for Yle in 2008, the newspaper publishers' criticism found itself a new target. A year later, the working group made a unanimous proposal about how and how much Yle should be funded, but the proposal was condemned by the press. The fierce publicity campaign against the proposal was able to create a political dispute, which effectively prevented the creation of a legislative proposal before the general elections of 2011 (Ala-Fossi, Hujanen, 2010, pp. 11–19). However, a slightly updated version of the funding system found enough support

in the newly elected parliament and a new income-linked, personal and earmarked Yle tax came into force in January 2013. The new system even had an automatic index mechanism, which was designed to keep Yle's income steady in relation to constantly rising expenses. The new funding system was considered to be future-proof and more just than the old flat-rate payment for households (Ala-Fossi, 2012, pp. 41–42).

At the same time, commercial media struggling with decreasing income saw the new, steady flow of income to public service media as an additional threat to its own development. In a public debate, the editors-in-chief of the newspapers repeatedly presented Yle as an over-resourced, state-owned media organisation which would be a growing threat not only to private media, but especially to the freedom of speech. The celebrated index mechanism was frozen by the Parliament already before the general elections of 2015. By the time of the elections, the private media campaign against Yle had reached its peak, and, after the election, the parties of the new Sipilä government, a centre-right-wing coalition, kept their promise and appointed two separate working groups to study the Finnish media markets. The second one, led by MP Arto Satonen, concentrated only on the remit and funding of Yle. Some of the proposals of the Satonen group in 2016 were obvious admissions to the private media sector such as the freezing of the index mechanism until 2019 and obligations to increase acquisitions from independent producers (Parlamentaarisen työryhmän muistio, 2016). But the group did not propose any drastic funding cuts or demolish the Yle funding system. From the viewpoint of the Finnish Media Federation, their political campaign had failed (Karppinen, Ala-Fossi, 2017).

That is why the Federation changed its tactics in 2017 and filed a complaint with the EU Commission, claiming that Yle's textual online content was in conflict with the EU state aid rules (Medialiitto, Avance, 2017). After (secret, not public) discussions with the Commission's DG Competition, Sanna Marin's government, in December 2020, proposed an amendment to the Act on Yle echoing the private media claims. The proposition would limit Yle's text-based journalistic content dramatically and limit it mainly to support the audio and video content on its TV and radio channels. In practice, this could mean less competition to commercial online news providers – but also limit freedom of speech disproportionately and widen inequalities related to access to news, developments that contradict the traditional role of media in the Nordic welfare states. Although the amendment was publicly criticized, the Parliament finally endorsed it in March 2022. Meanwhile, another complaint to the EU Commission was filed in

April 2021 by Sanoma Corporation. Sanoma's claim is that Yle's online learning services and video-on-demand services fall outside its public service remit and should either be cancelled or narrowed radically (Sanoma, Geradin Partners, 2021).

The continuous uncertainty and debate about Yle's funding, and the two complaints in particular, illustrate how the earlier consensus in Finnish media policy on the undisputed status of national media institutions such as Yle has unravelled (Nieminen, 2010, pp. 55–56). It appears that the public broadcaster is increasingly exposed to assaults that question its legitimacy.

Public support of commercial media

While the public broadcaster Yle was obliged to carry out the digitisation of television and finance it by selling its broadcast network, the Finnish government decided to favour the interests of the commercial broadcasters and to smooth their path to digitisation by firstly halving their operating licence fees in 2002 and, later in 2007, totally abolishing them. These fees represented 22–24% of the turnover of each broadcaster, amounting, in 2000, to €47 million. What was annoying for MTV3 and Nelonen was not the licence fee in itself, but the fact that it was allocated to finance YLE, making up some 15% of YLE's turnover. The abolition of the fee somewhat muted the criticism of the media firms, claiming that YLE was competing against them with their money, but, as shown above, did not silence the continuous attacks by the industry lobby against the “too generous” funding of the company. (Hellman, 2010, p. 198) Yet, this concession can be seen as an annual support worth dozens of millions to commercial media companies.

In mobile communication, Finland has declared spectrum auctions since 2013, but as far as licences of broadcast communication are concerned, a more protective strategy has been applied. Unlike, for example, Sweden, commercial broadcasters in Finland do not have to pay more than a small administrative fee for the programming licences they are granted. Moreover, since the new Information Society Code (917/2014) came into force in 2015, no expediency consideration of applicants, or a so-called “beauty contest” between them, is exercised by the operating licence authority as far as there is adequate transmission capacity available (Tietoyhteiskuntakaari, 2014, section 25).¹ In other words, any applicant who is solvent and has the apparent ability to broadcast regularly, is

¹ Today, the law is known as the Act on Electronic Media Services (Laki sähköisen viestinnän palveluista, 2014).

automatically fit to gain a programming licence. This can be seen as a helping hand for both incumbent companies and new entrants. It should be noticed that, since 1994, the public broadcaster Yle has been exempt from the licencing procedure. It has, in fact, a special right to obtain the spectrum capacity it requires for its radio and television operations.

Meanwhile, the government also saved two individual private news organisations from a looming bankruptcy with tailor-made cash injections. Both the Finnish News Agency (STT) as well as MTV3 News are relatively big players with monopolistic positions in their fields, but from a historical point of view, they have also had a special relationship to the state as well as to public broadcasting, which may go some way to partly explaining their continuing protection.

MTV3 (formerly MTV) has a special historical position in relation to Yle because it was established already in 1957 to collect additional funding for nationwide Finnish television service of Yle. Here, Finland chose a different path from other Nordic countries, where commercial television was not introduced until the 1990s (Hellman, 1999, pp. 71–73). MTV produced and delivered mostly drama and entertainment on its own broadcast slots on Yle channels until 1981, when the company was allowed to launch its own television newscasts (Hellman, 1999, pp. 396–408; Lyytinen, 2006). The idea was to create a private alternative, a commercial competitor for Yle news to provide additional diversity. News production soon became a central part of MTV's company profile, and it was in an essential role in 1993 when MTV was able to get their own nationwide television channel, MTV3 (Hellman, 1999, pp. 94–101). The second commercial TV channel in Finland, Nelonen, started four years later and, during the following decade, the number of channels multiplied rapidly because of the digitisation of television.

At first, some of the new channels had licence obligations to also provide news and some tried to follow the example of MTV3, but news operations turned out to be quite expensive. Even though Nelonen was supported by the *Helsingin Sanomat* news organisation, by far Finland's biggest newspaper, it was constantly forced to seek new and more efficient ways to produce television news. Simultaneously with the abolition of expediency consideration, all licence conditions were removed in one fell swoop, and TV channels were able to abandon news programming entirely (Ala-Fossi, 2020, p. 140). The fragmentation of the television advertising market and redistribution of media advertising income combined also hit the business results of MTV3 hard. In 2013, it had to lay off several journalists, cancel and shut down current affairs programmes and, finally, in 2015, also had to outsource their entire TV news production.

To solve the problem, Sipilä's government appointed another working group to study the future of commercial TV news. In 2017, this so-called Harkimo group proposed an offering of special state support in the amount of €8 million (Kaupallisen television uutistoimintaa tarkastelevan työryhmän raportti, 2017). In the end, the government decided to grant aid of not more than €1 million in 2018 but a maximum of €2 million in the following year – if the applicant TV channels met the requirements of a new licensing category called “public interest channels” with special obligations for television news delivery. Mediahub, a sub company of MTV3 news production, thought this was a good model, but Sanoma was critical towards this type of specialised state support and decided to close down its newscasts on Nelonen after 20 years on the air.

MTV3 had been able to get specialised state support already earlier in the form of €1.5 million of media innovation support. This was used between 2015 and 2018 for building the company's new online consumer service called C More (4Front, Gaia Consulting, 2018). Specialised support in the form of €3 million for TV channels with public interest licence obligations for news production and delivery in 2018–2019 was eventually granted entirely to MTV3 News. At the time, there were only two channels with a required licence and, accordingly, formally eligible to apply for the support – and the other channel (Alfa-TV) would have used the money for starting a news operation from scratch. Targeted state support may have given some extra boost for new ownership arrangements. MTV3 was near bankruptcy in 2015, but three years later Bonnier, MTV3's proprietor, was able to sell it together with the rest of its Nordic TV business to Telia, a Swedish multinational telecommunications company and mobile network operator.

The Finnish News Agency (STT), a company owned by the largest newspapers in Finland, was able to gain a monopoly and special co-operative partnership with the newly independent republic already in the 1920s. The newspapers had their doubts about the new media of the time, but after STT started to deliver the news for Yle radio in 1926, this arrangement gave the press both a chance to control the news on air as well as to get some extra income to support the news agency. In addition, the state also paid direct support until the 1950s to keep STT running (Rantanen 1987, pp. 119–120). Although Yle started its own in-house news production for radio and television in 1965, it continued to deliver STT news too on the radio until 2003. In 2006, Yle decided to give up its subscription of the STT news agency service. As a result, STT lost €1.3 million of annual income and was forced to lay off journalists. During the following decade, some of the largest newspapers including *Kauppalehti*

and *Helsingin Sanomat*, which were also owners of STT, cancelled their subscriptions. The news agency was owned by the largest commercial media companies in the country, but the owners were also rivals with no shared vision of the future of the agency.

At that point in 2016, the Satonen working group proposed – in practice, they actually ordered – Yle to return as a paying subscriber of STT (Parlamentaarisen työryhmän muistio, 2019, p. 5), which was a traditional way to channel public money indirectly to support the private news agency owned by the largest commercial publishing houses. A new agreement with Yle was signed in 2017, but there were more setbacks to come as the agency had to shut off its Swedish-speaking department. STT eventually found itself staggering on the verge of bankruptcy, and the owners announced that they must have direct public support to save the company. Quite soon after the government agreed to help STT with a one-time €1 million earmarked direct state support for the agency in 2018, Sanoma, the largest owner of STT, acquired a qualified majority (75.4%) of STT shares from two other publishers and Helsingin Sanomat returned as a subscriber of STT services. Again, a cash injection by the state helped the private owners to make up their minds.

In the spring of 2021, the Ministry of Transport and Communications published its proposal for a permanent aid mechanism in support of journalism (Wirén et al., 2021). This report was based on the work of the working group of media representatives and experts that was initially set up to assist in preparing a temporary State subsidy for journalism. The working group proposed editorial production support as the main form of journalism support. As another form of support, development aid could be granted not only to start-up media, but also to existing media for development projects. Both grants were targeted to support the media providing news and current affairs content. In addition, the working group proposed specific support for community media. The model as a whole would promote reliable, diverse, and socially significant communication. However, in the government's budget negotiations later that spring, no funding was allocated to follow the report's proposals.

Discussion: Media and Communications Policy Without a Cause?

As the examples above indicate, it is difficult to find an overriding strategy or a vision behind recent media and communications policy. Instead of any specific long-term media policy goals or principles, many of the recent Finnish media policy decisions have served pragmatic aims

of solving emergent regulatory problems or serving existing economic interests.

This is reflected, for example, in competition policy and approaches to media concentration, which have been guided by the rationale of fostering “national champions”, and consolidate the whole industry, rather than supporting plurality through smaller, independent actors. Paradoxically, in Finland, public support to the media industry is primarily given in the form of indirect, not direct, aid and presents itself rather in the form of non-intervention policy than active, deliberate interference. The reduced VAT rate for newspapers and magazines as well as the programming licences free of charge for private broadcasters provide the most obvious examples of the first strategy while the liberal, *laissez-faire* approach to media mergers and concentration is illustrative of the second. Both measures help the large legacy companies to survive, while the so-called “number two” options have been left little space to manoeuvre.

Similarly, the direct support mechanisms, such as the COVID-19 support or state subsidies to STT and MTV3 have been guided by short-term needs of established market actors, rather than long-term goals of shaping the structure of the media market. As a result, a small circle of powerful owners controls the industry. The market of all news media sectors is highly concentrated but, at the same time, the number of channels and titles has remained high thus leaving no major, so-called “news deserts” in Finland.

In the first decade of the 2000s, Finland was one of the first countries to adapt to the new digitised media environment. Finland was in the forefront in transforming television broadcasting into the digital era, starting from 2001; in 2008 the Finnish government announced a policy programme “Broadband to All by 2015” (Ministry of Transport and Communications, 2008) (which, in 2022, is still waiting to be completed); in 2010 Finland was the first country in the world to decree a broadband Internet connection as a Universal Service Obligation (Ministry of Transport and Communications, 2010); and in 2014 it was the first country to create a converged regulatory framework for electronic media and telecommunications (Ministry of Transport and Communications, 2013; Nieminen, 2013).

After this period of activity, however, Finnish media policy has been criticised by many as being *ad hoc* based, reactive, and lacking a clear vision or guiding principles (Ala-Fossi, 2020; Karppinen, Ala-Fossi, 2017; Koivunen, 2018). Despite references to abstract principles, such as citizens’ communication rights, in the high-level media policy programmes, actual policy-making has been sectorally focused and

often driven by short-term industry interests. One reason for the lack of coherent policy principles lies in the fragmentation of media policy issues across several ministries and regulatory policies. The Ministry of Transport and Communications, for example, mostly approaches media from the perspective of infrastructure and markets, whereas issues related to democracy and freedom of expression belong to the field of the Ministry of Education and Culture or the Ministry of Justice. The general impression is that the Government is waiting for new policy initiatives from the European Commission, without its own active policies.

To some extent, the lack of coordination and foresight has been recognised by policymakers. In 2017, the government announced a media policy programme (2018–2023) with the aims of safeguarding citizens' access to information, the conditions of producing journalism, and the diversity of Finnish media. The aim was to look at media policy comprehensively across the administration and improve evidence-based media policy-making. As part of preparing the programme, the government invited researchers to inform policy-making. In 2017, the Ministry of Transport and Communications also commissioned a university consortium to produce a multidisciplinary academic study of the current state of media policy in Finland by bringing together expertise from journalism studies, communication studies, business economics, and law (Ala-Fossi et al., 2018; Ala-Fossi et al., 2020). Instead of a traditional sectoral approach, the study sought a holistic way of evaluating the development of the media and communications field.

Experiences from researcher participation in media policy, however, indicate that its impact in shaping actual policy-making is limited at best (Grönlund et al., 2020). In addition to government and ministries, stakeholder groups, such as media companies and industry associations, have their own media policy agenda and interests to lobby (Grönlund et al., 2020, pp. 168–169). According to the media policy review, the media industry and government actors account for the overwhelming majority of participation in policy consultations and committees, and the role of citizens, civil society, and academic researchers has often been marginal (Ala-Fossi et al., 2018, pp. 261–276). Studies on stakeholder participation also show that when round table discussions are organised, there is often no consistent understanding of the issues or reliable information on the direction of development among the different stakeholders (Grönlund et al., 2020; Lund, 2016).

Examined against the ideals of the Nordic Media Welfare State, it seems that the understanding of communication services as a public good or deliberate cultural policy to promote media pluralism have not

consistently been featured as the guiding principles of Finnish media policy-making. Instead, media policy has been characterised by selective deregulation, in which media and communication are seen as goods and services on par with other market products.

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