

2026 Rule of Law Report - targeted stakeholder consultation

Fields marked with * are mandatory.

Introduction

The annual Rule of Law Report lies at the centre of the Annual Rule of Law Cycle, which acts as a preventive tool, deepening multilateral dialogue and joint awareness of rule of law issues. So far, six editions of the Rule of Law Report have been published since 2020.

As every year, the Commission would like to invite the stakeholders to provide contributions to the 2026 Rule of Law Report. On the basis of these contributions and on-going developments, further targeted questions may be shared at a later stage of preparation of the 2026 Rule of Law Report, in particular in the context of country visits, or bilateral contacts.

The Commission invites stakeholders to provide contributions which include:

**(1) developments and measures taken in relation to the recommendations in the 2025 report,
(2) developments related to topics covered in the 2025 country chapters, as well as any other new developments related to the rule of law.**

The input should consist of a short summary, if possible in English, covering the areas referred to below. Legislation or other documents may be referenced with a link. Contributions should focus on significant developments since the last Rule of Law Report both as regards the legal framework and its implementation in practice.

This questionnaire also integrates the separate questionnaire on the single market from last year. In addition to these specific questions, respondents to the questionnaire are invited to consider the Single Market dimension, including any relevant cross-border issues, in all their answers.

Where questions of particular relevance under the single market dimension, this is indicated before the relevant question.

[1] Unless the information was already submitted in the input for the previous Rule of Law Reports.

Type of information to be included:

Under each of the four pillars, the replies should include references to the following types of information:

A) Legislative developments

- Newly adopted legislation
- legislative drafts currently discussed in Parliament
- legislative plans envisaged by the Government

B) Policy developments

- Implementation and enforcement of legislation
- evaluations, impact assessment, surveys
- white papers/strategies/actions plans/consultation processes
- follow-up to reports/recommendations of Council of Europe bodies or other international organisations
- important administrative measures
- generalised practices

C) Developments related to the judiciary / independent authorities

- important case law by national courts
- important decision/opinions from independent bodies/authorities
- state of play on terms, nominations and expired mandates for high-level positions (e.g. Supreme Court, Constitutional Court, Council for the Judiciary, Prosecutor General, heads of independent authorities included in the scope of the request for input[2])

D) Any other relevant developments

- National authorities are free to add any further information, which they deem relevant; however, this should be short and to the point.

Where relevant, please also indicate whether the developments reported are linked to the implementation of reforms and investments under the national Recovery Resilience Plan. To simplify your answers to the questionnaire, if there are no developments, it is sufficient to indicate this and the information covered in the contributions for the previous Rule of Law Reports does not need not be repeated.

[2] Such as: media regulatory authorities and bodies, national human rights institutions, equality bodies, ombudsman institutions, supreme audit institutions and, where they exist, transparency authorities.

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☒ Civil society organisation/NGO
- ☐ International organisation
- ☐ Judicial association or network
- ☐ Media organisation or association
- ☐ Public authority or network of public authorities
- ☐ Other

* Organisation name

250 character(s) maximum

International Press Institute (IPI)

Main Areas of Work

- ☐ Justice System
- ☐ Anti-corruption
- ☒ Media Pluralism and Freedom
- ☐ Checks and Balances
- ☐ Other

Please insert an URL towards your organisation's main online presence or describe your organisation briefly:

500 character(s) maximum

<https://ipi.media/>

IPI is a global network of journalists defending media freedom and independent journalism wherever they are threatened.

Transparency register number

Check if your organisation is in the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making

370877536078-58

* Country of origin

Please indicate the country of origin of your organisation

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☒ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Other - please specify

First name

Jamie

Surname

Wiseman

Email Address of the organisation

info@ipi.media

*** Publication of your contribution and privacy settings**

You can choose whether you wish for your contribution to be published and whether you wish your details to be made public or to remain anonymous.

- ☐ Anonymous - Only your type of respondent, country of origin and contribution will be published. Organisation name, URL, transparency register number, first name and surname given above will not be published. **To maintain anonymity, please refrain from mentioning the name of your organisation and any details from which your organisation can be identified in the rest of your contribution as we will not be able to guarantee anonymisation of these elements.**
- ☒ Public - Your personal details (name, organisation name, transparency register number, country of origin will be published with your contribution).
- ☐ No publication - Your contribution will not be published. Elements of your contribution may be referred to anonymously in documents produced by the Commission based on this consultation.

☒ I agree with the personal data protection provisions.

[Specific privacy statement targeted stakeholder consultation 2026 rule of law report.pdf](#)

Questions on horizontal developments

In this section, you are invited to provide information on general horizontal developments or trends, both positive and negative, covering all or several Member States. In particular, you could mention issues that are common to several Member States, as well as best practices identified in one Member State that could be replicated. Moreover, you could refer to your activities in the area of the four pillars and sub-topics (an overview of all sub-topics can be found below), and, if you represent a Network of national organisations, to the support you might have provided to one of your national members.

Overview topics for contribution

[List of topics for contribution.docx](#)

Please provide any relevant information on horizontal developments here

5000 character(s) maximum

Questions for contribution

Under each pillar, you are invited to provide information on measures taken to implement the recommendations addressed to the Member State in the 2025 Rule of Law report, as well as developments with regard to the points raised in the respective country chapter of the 2025 Rule of Law Report and any other significant developments since January 2025 and up to the date of submission[3]. Please always include a link to and reference relevant legislation/documents (in the national language and/or where available, in English). **Significant developments** can include challenges, positive developments and best practices, covering both legislative developments or implementation and practices.

Information provided in reply to the first question under each pillar, related to the follow-up to the recommendations, does not need to be repeated in subsequent parts of the questionnaire, but can be cross-referenced in the subsequent questions, where relevant. All other questions are not limited to the recommendations, but as in previous years, cover the entire scope of the Report.

[3] Unless already covered in the input for the previous Rule of Law Reports.

Member State/enlargement country covered in contribution [only one choice possible]

If you wish to submit information concerning several Member States/enlargement countries, please fill in the questionnaire separately for each country. There is no limit to the number of contributions submitted by a single participant.

- ☐ Albania
- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☒ Finland

- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Montenegro
- ☐ Netherlands
- ☐ North Macedonia
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Serbia
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden

I. Justice System

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the justice system (if applicable)

5000 character(s) maximum

A. Independence

Appointment and selection of judges, prosecutors and court presidents (incl. judicial review)

(The reference to 'judges' concerns judges at all level and types of courts as well as judges at constitutional courts)

5000 character(s) maximum

Irremovability of judges, including transfers, (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

5000 character(s) maximum

Promotion of judges and prosecutors (incl. judicial review)

5000 character(s) maximum

Allocation of cases in courts

5000 character(s) maximum

Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e. g. Council for the Judiciary)

5000 character(s) maximum

Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)

5000 character(s) maximum

Independence/autonomy of the prosecution service

5000 character(s) maximum

Independence of the Bar (chamber/association of lawyers) and of lawyers

5000 character(s) maximum

Significant developments capable of affecting the perception that the general public has of the independence of the judiciary

5000 character(s) maximum

B. Quality of justice

(Under this topic, you are not required to give statistical information but should provide input on the type of information outlined in the introduction)

[single market relevance] Accessibility of courts (e.g. court/legal fees, legal aid, language)

5000 character(s) maximum

Resources of the judiciary (human/financial/material), remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year)

(Material resources refer e.g. to court buildings and other facilities. Financial resources include salaries of staff in courts and prosecution offices.)

5000 character(s) maximum

[single market relevance] Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

5000 character(s) maximum

Digitalisation (e.g. use of digital technology, including electronic communication and AI tools, within the justice system and with court users, procedural rules, access to judgments online)

5000 character(s) maximum

Use of assessment tools and standards (e.g. ICT systems, including AI-based systems, for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)

5000 character(s) maximum

Geographical distribution and number of courts/jurisdictions (“judicial map”) and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases.

5000 character(s) maximum

[single market relevance] Specialisation (of judges/specific courts/chambers within courts) and training for the judiciary to deal with commercial cases, as well as alternative dispute resolution mechanisms and mediation as regards commercial cases.

5000 character(s) maximum

C. Efficiency of the justice system

(Under this topic, you are not required to give statistical information but should provide input on the type of information outlined in the introduction)

[single market relevance] Developments related to efforts to improve the efficiency of the justice system (e.g. as regards length of proceedings, to address backlogs)

5000 character(s) maximum

Any other developments related to the justice system - please specify

5000 character(s) maximum

II. Anti-Corruption Framework

Where previous specific reports, published in the framework of the review under the UN Convention against Corruption, of GRECO, and of the OECD address the issues below, please make a reference to the points you wish to bring to the Commission's attention in these documents, indicating any relevant updates, changes or measures introduced that have occurred since these documents were published.

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the anti-corruption framework (if applicable):

5000 character(s) maximum

A. The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)

List any **changes** as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical/specialised resources as relevant), including the cooperation among domestic and with foreign authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO

5000 character(s) maximum

Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption

5000 character(s) maximum

Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators

5000 character(s) maximum

B. Prevention

Measures to enhance integrity in the public sector in particular as regards high-level officials (including as regards incompatibility rules, revolving doors, codes of conduct, ethics)

5000 character(s) maximum

Measures to enhance general transparency of public decision-making (including rules on lobbying, asset and interest disclosure rules, gifts policy, transparency of political party, financing)

5000 character(s) maximum

Measures to prevent conflicts of interest in the public sector. Please specify the features and scope of their application (e.g. categories of officials concerned, types of checks and corrective measures depending on the category of officials concerned)

5000 character(s) maximum

--> For the three previous points, **please also provide information and figures on their application/enforcement if available to you**, such as number of detected breaches/irregularities of the various rules in place and the follow-up given (investigations, sanctions, etc.)

Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given)

5000 character(s) maximum

[single market relevance] Specific measures to enhance transparency, integrity and accountability in sectors with high risks of corruption, with a view to monitor and prevent corruption and conflict of interests, and where applicable measures to prevent and address corruption committed by organised crime groups.

- *Such high-risk sectors could include: public procurement, including construction, transport/infrastructure, defence, cohesion, agriculture, environment, healthcare, investor residence schemes, large-scale investments of national interest and the spending of EU funds, urban planning.*
- *In particular, measures to mitigate high risks of corruption in the area of public procurement, such as enhancing transparency and oversight (for example through digital technologies) and promoting fair competition and accountability in public procurement (e.g. targeted actions to address the high share of single bids) and measures to guarantee the effective and independent functioning of the public procurement review bodies.*

5000 character(s) maximum

[single market relevance] Measures for the prevention of corruption in relation to the issuing of official permits (e.g. related to environment, energy, service provision and various types of construction)

5000 character(s) maximum

C. Repression

The legal framework on the criminalisation and sanctions for corruption and related offences, including foreign bribery

5000 character(s) maximum

Official data on the number of investigations, prosecutions, final judgments and the application of sanctions for corruption offences (differentiated by offence if possible). Please indicate whether the cases: involve legal persons; are related to the implementation of EU or national funds; involve high level corruption. Please indicate which data is publicly available and how policy-making is informed by the data

5000 character(s) maximum

Potential obstacles identified in law or in practice to the investigation and prosecution of high-level and complex corruption cases (e.g. political immunity regulation, procedural rules, statute of limitations, cross-border cooperation, pardoning)

5000 character(s) maximum

Information on effectiveness of criminal and non-criminal measures and of sanctions (e.g. recovery measures and administrative sanctions) on both public and private offenders

5000 character(s) maximum

Any other developments related to the anti-corruption framework - please specify

5000 character(s) maximum

III. Media pluralism and media freedom

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding media pluralism and media freedom (if applicable)

5000 character(s) maximum

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.

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.

The additions to national law include: A new subsection to the Act on the Exercise of Freedom of Expression in Mass Media (460/2003), clarifying that obligations of media service providers are laid down in EMFA. 2 3 Amendments to the Act on Yleisradio Oy (1380/1993) to incorporate EMFA's requirements regarding the criteria and procedures for appointing and dismissing the management of public service media providers. New act 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. 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. However, many key stakeholders viewed EMFA as an important democratic and value-based initiative.

<https://ipi.media/wp-content/uploads/2025/12/FINLAND-media-Capture-Monitoring-Report-Overview-Final.pdf>

A. Media authorities and bodies

(Cf. Article 30 of Directive 2018/1808)

Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies

5000 character(s) maximum

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 project 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 evidencebased approach to implementation. 10 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 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. With regard to Yleisradio (Yle), the new amendment assigns Traficom a financial supervisory role.

<https://ipi.media/wp-content/uploads/2025/12/FINLAND-media-Capture-Monitoring-Report-Overview-Final.pdf>

Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies

5000 character(s) maximum

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 rules which are set out in a separate decree. The Director's term of office is five years. 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. 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. 37 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.

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

<https://ipi.media/wp-content/uploads/2025/12/FINLAND-media-Capture-Monitoring-Report-Overview-Final.pdf>

Existence and functions of media councils or other self-regulatory bodies

5000 character(s) maximum

B. Safeguards against government or political interference and transparency and concentration of media ownership

[single market relevance] Measures taken to ensure the fair and transparent allocation of state advertising

5000 character(s) maximum

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.

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.

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. 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. 83 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. The Ministry of Education and Culture offers financial assistance to media outlets publishing in minority languages. 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).

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.

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.

<https://ipi.media/wp-content/uploads/2025/12/FINLAND-media-Capture-Monitoring-Report-Overview-Final.pdf>

Safeguards against state / political interference, in particular:

- safeguards to ensure editorial independence of media (private and public)
- specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their financial and operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions
- **[single market relevance]** information on specific legal provisions and procedures applying to media service providers, including as regards granting /renewal/termination of licenses, company operation, capital entry requirements, concentration and corporate governance

5000 character(s) maximum

[single market relevance] Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners

5000 character(s) maximum

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

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. 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.

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. 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.

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 concentration , the Competition and Consumer Authority (FCCA) oversees market efficiency, intervening in practices such as cartels and mergers that could result in the misuse of a dominant market position. The objective of merger control is to safeguard effective competition and, in turn, the market economy from the adverse effects of market concentration. Notable amendments were made to the Competition Act in 2022, based on the ECN+

Directive. Some of the amendments have significant implications for companies and industry organisations. The amendments included an expansion of the regulatory authority's powers, notably its ability to conduct consultations, request information, and exercise inspection powers. In general, the scope of its powers was broadened.

<https://ipi.media/wp-content/uploads/2025/12/FINLAND-media-Capture-Monitoring-Report-Overview-Final.pdf>

C. Framework for journalists' protection, transparency and access to documents

Rules and practices guaranteeing journalists' independence and safety, including as regards protection of journalistic sources and communications, referring also, if applicable, to follow-up given to alerts lodged with the Council of Europe's Platform to promote the protection of journalism and safety of journalists

5000 character(s) maximum

Mapping Media Freedom data by Media Freedom Rapid Response (MFRR). All data from Finland in 2025 - <https://www.mapmf.org/explorer?f.year=2025&f.country=Finland&show=list&sort=timestamp%3Adesc>

Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists

5000 character(s) maximum

Mapping Media Freedom data by Media Freedom Rapid Response (MFRR). All data from Finland in 2025 - <https://www.mapmf.org/explorer?f.year=2025&f.country=Finland&show=list&sort=timestamp%3Adesc>

Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information)

5000 character(s) maximum

Mapping Media Freedom data by Media Freedom Rapid Response (MFRR). All data from Finland in 2025 - <https://www.mapmf.org/explorer?f.year=2025&f.country=Finland&show=list&sort=timestamp%3Adesc>

Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits

5000 character(s) maximum

Any other developments related to media pluralism and freedom - please specify

5000 character(s) maximum

On 1 July, the appeal court confirmed the 2023 conviction of the two journalists by the lower Helsinki District Court and found them guilty of “revealing a security secret” through their reporting of classified information, which had centred on the Finnish Defence Forces’ Signal Testing Centre and military intelligence operations. Disclosing a security secret is classified as a crime of treason under Finnish law. The appeal court also overturned one element of the lower court’s verdict and additionally found the journalists guilty of “attempting to reveal a security secret”. As the journalists had drafted a follow-up article for publication, they were charged under a clause of Finland’s national security law of “attempting” to reveal classified information – even though it was never actually published by the newspaper. In its verdict, the court upheld the four-month suspended prison sentence handed down to Pietiläinen, who wrote the article, and the fine for Halminen, who had contributed to the piece. Halminen has since left the newspaper. It also upheld the acquittal of Kalle Silfverberg, the editor of the political department at the time. Prosecutors had demanded prison sentences for all three journalists.

The International Press Institute (IPI) and its Finnish National Committee express alarm over the recent verdict by the Court of Appeal in Finland to uphold the suspended prison sentence and fine handed down to two journalists from leading daily newspaper Helsingin Sanomat over their reporting on the country’s military intelligence services. IPI and its Finnish Committee stress that the verdict by the Helsinki Court of Appeal against Tuomo Pietiläinen and Laura Halminen poses serious questions for the freedom of the press in Finland and the use of national security arguments to restrict public-interest reporting. Particularly concerning is that part of the verdict concerned an unpublished article.

“Today’s verdict risks a chilling effect on journalistic reporting on national security in Finland and raises questions about protections for media freedom in Finland”, said IPI Executive Director Scott Griffen. “While courts can be asked to strike a balance between journalistic freedom and national security, in this case the court recognized the public interest nature of the reporting. IPI believes that this criminal sentencing is disproportionate and not justified by the facts of the case.

“We are particularly concerned by the fact that a journalist can be given a prison sentence for simply writing – not even publishing – an article which handles classified information, which poses a clear risk to the standard process of investigative journalism.”

Anne Leppäjärvi, the chair of IPI’s Finnish National Committee, said: “The key point is that the part of the verdict was based on unpublished drafts and resulted in a suspended prison sentence. The chilling effect on investigative journalism is quite evident.

<https://ipi.media/finland-appeal-court-verdict-on-helsingin-sanomat-state-secrets-case-sends-a-chilling-message/>

Mapping Media Freedom data by Media Freedom Rapid Response (MFRR). All data from Finland in 2025 - <https://www.mapmf.org/explorer?f.year=2025&f.country=Finland&show=list&sort=timestamp%3Adesc>

IV. Other institutional issues related to checks and balances

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the system of checks and balances (if applicable)

5000 character(s) maximum

A. The process for preparing, enacting and implementing laws

[single market relevance] Framework, policy and use of impact assessments and evidence based policy-making, stakeholders'*/public consultations (including rules and practices on the transparent participation of civil society to policy development and decision-making processes), and transparency and quality of the legislative process in the preparatory, the parliamentary and implementation phase (including guidance on how to implement legislation)

** This includes also the consultation of social partners*

5000 character(s) maximum

[single market relevance] Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency /urgent procedure compared to the total number of adopted decisions)

5000 character(s) maximum

[single market relevance] Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

5000 character(s) maximum

Rules and application of states of emergency (or analogous regimes), including judicial review and parliamentary oversight

5000 character(s) maximum

Regime for constitutional review of laws

5000 character(s) maximum

B. Independent authorities

Independence, resources, capacity and powers (including effective access to relevant data) of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

(Cf. the website of the European Court of Auditors: <https://www.eca.europa.eu/en/Pages/SupremeAuditInstitutions.aspx#>)

5000 character(s) maximum

Statistics/reports concerning the follow-up to recommendations by National Human Rights Institutions, ombudsman institutions, equality bodies and supreme audit institutions in the past year

5000 character(s) maximum

[single market relevance] Safeguards to ensure the effective independence of supervisory and regulatory authorities with a direct impact on economic operators such as national economic oversight, enforcement and competition authorities

C. Accessibility and judicial review of administrative decisions

[single market relevance] Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) and respect of the good administration principle (including the obligation of the administration to give reasons for decisions)

5000 character(s) maximum

[single market relevance] Judicial review of administrative decisions: short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review)

5000 character(s) maximum

[single market relevance] Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)

5000 character(s) maximum

[single market relevance] Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)

5000 character(s) maximum

[single market relevance] Implementation of final judgments by the public administration and State institutions and follow-up given to supranational judgments, including decisions from the European Court of Human Rights, as well as available remedies in case of non-implementation

5000 character(s) maximum

Oversight, including by courts, of the use of intrusive surveillance software by national authorities

5000 character(s) maximum

D. The enabling framework for civil society

Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration, transparency and dissolution rules)

5000 character(s) maximum

Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures to protect them from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services, as well as available remedies

5000 character(s) maximum

Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

5000 character(s) maximum

E. Initiatives to foster a rule of law culture

If there have been developments related to initiatives to foster a rule of law culture, please specify, which (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, contributions from civil society, education initiatives, etc.)

5000 character(s) maximum

Any other developments related to the system of checks and balances - please specify

5000 character(s) maximum

Cross-pillar elements: cross-border rule of law issues related to the Single Market

If there are any significant challenges concerning the Single Market you have been facing in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities, that you would like to highlight, please do so here.

Given the cross-cutting nature of this question, it is included as a separate section in the questionnaire. Information collected under this question will however be integrated under the relevant existing pillar(s) of the Report.

5000 character(s) maximum

Supporting document upload

If you would like to submit any supporting document(s) to your contribution, please upload your file(s) here

Contact

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