

MONITORING MEDIA PLURALISM IN THE DIGITAL ERA

APPLICATION OF THE MEDIA PLURALISM MONITOR IN THE EUROPEAN UNION, ALBANIA, MONTENEGRO, THE REPUBLIC OF NORTH MACEDONIA, SERBIA & TURKEY IN THE YEAR 2021

Country report: Sweden

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Research Project Report

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1. About the project

1.1. Overview of the Project

The Media Pluralism Monitor (MPM) is a research tool designed to identify potential risks to media pluralism in the Member States of the European Union and in candidate countries. This narrative report has been produced on the basis of the implementation of the MPM carried out in 2021. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

1.2. Methodological notes

Authorship and review

The CMPF partners with experienced, independent national researchers to carry out the data collection and to author the narrative reports, except in the case of Italy where data collection is carried out centrally by the CMPF team. The research is based on a standardised questionnaire that was developed by the CMPF.

In Sweden the CMPF partnered with Mathias A. Färdigh (University of Gothenburg), who conducted the data collection, scored and commented on the variables in the questionnaire and interviewed experts. The report was reviewed by the CMPF staff. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.

Risks to media pluralism are examined in four main thematic areas: Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness. The results are based on the assessment of a number of indicators for each thematic area (see Table 1).

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of media	Access to media for minorities
Protection of right to information	News media concentration	Editorial autonomy	Access to media for local/regional communities and for community media
Journalistic profession, standards and protection	Online platforms concentration and competition enforcement	Audiovisual media, online platforms and elections	Access to media for women
Independence and effectiveness of the media authority	Media viability	State regulation of resources and support to media sector	Media Literacy
Universal reach of traditional media and access to the Internet	Commercial & owner influence over editorial content	Independence of PSM governance and funding	Protection against illegal and harmful speech

Table 1: Areas and Indicators of the Media Pluralism Monitor

The digital dimension

The Monitor does not consider the digital dimension to be an isolated area but, rather, as being intertwined with the traditional media and the existing principles of media pluralism and freedom of expression. Nevertheless, the Monitor also extracts digital-specific risk scores, and the report contains a specific analysis of risks related to the digital news environment.

The calculation of risk

The results for each thematic area and indicator are presented on a scale from 0 to 100%.

Scores between 0 and 33%: low risk

Scores between 34 and 66%: medium risk

Scores between 67 and 100%: high risk

With regard to indicators, scores of 0 are rated 3% while scores of 100 are rated 97% by default, in order to avoid an assessment of total absence, or certainty, of risk.

Disclaimer: The content of the report does not necessarily reflect the views of the CMPF, nor the position of the members composing the Group of Experts. It represents the views of the national country team that carried out the data collection and authored the report. Due to updates and refinements in the questionnaire, MPM2022 scores may not be fully comparable with those in the previous editions of the MPM. For more details regarding the project, see the CMPF report on MPM2022, available on: <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Introduction

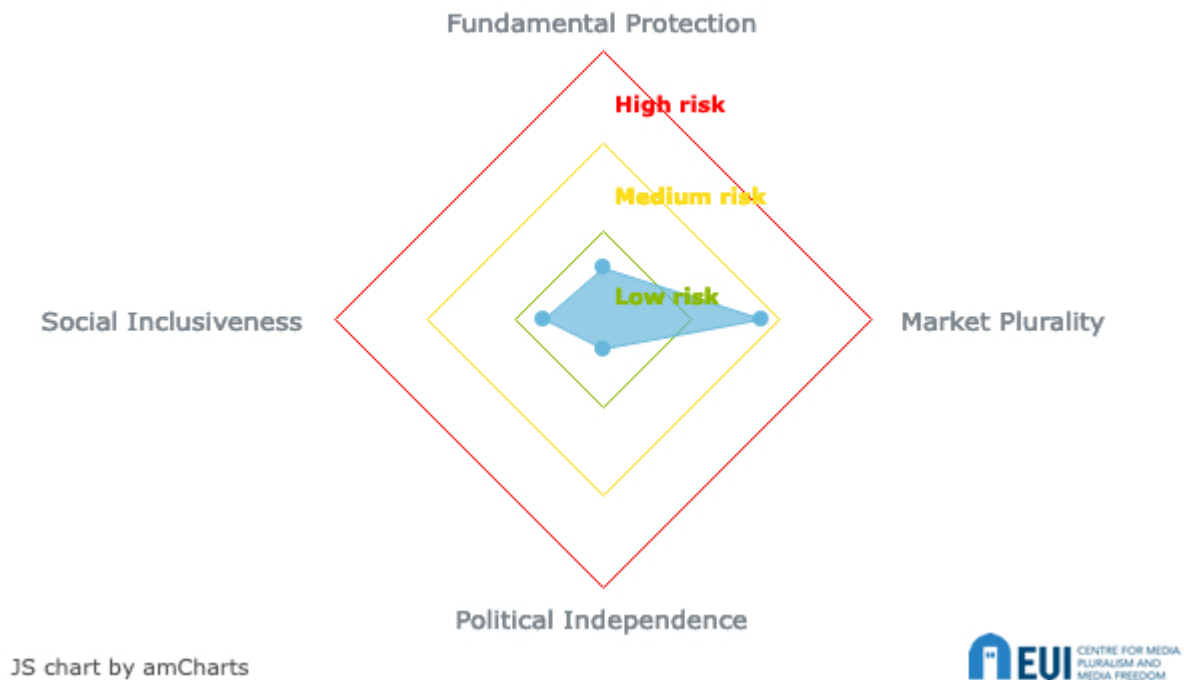
- **Country overview.** Sweden is the third-largest country in Western Europe and located on the Scandinavian Peninsula in Northern Europe. It is bordered by Finland to the east, Norway on the west and north and connected to Denmark in the southwest by the bridge-tunnel across the Öresund Strait. In relation to its area, Sweden is one of the least populated countries in Europe, with a population of 10,4 million people. Urban growth in Sweden has followed industrialization and since the 1900th century, many people have moved from the countryside to the cities of Stockholm, Gothenburg, and Malmö. About 19 percent of the population is born in a foreign country and 2 million of the Swedish population are under the age of 18.
- **Languages.** The official language is Swedish, and most Swedes also speak English to a very high level. Sweden has five official national minority languages (Finnish, Meankieli, Yiddish, Romani, Sami) and countless other languages are spoken by the diverse population. After Swedish, the most common are Finnish, Serbo-Croatian, Arabic, Kurdish, Spanish, German, and Farsi.
- **Minorities.** The ethnic and cultural diversity in Sweden has a long historical tradition. Several of the groups that for a long time constituted minorities in Sweden have actively defended their own group's culture and language so that these cultures and languages still constitute a living part of Swedish society. This includes Sweden's indigenous people, the Sami but also the Tornedalians, the Swedish Finns, the Roma and the Jews. Common to the Swedish minority groups is that they have populated Sweden for a long time and that they constitute groups with a pronounced affiliation. They also have their own religious, linguistic or cultural affiliation and a desire to maintain their identity.
- **Political situation.** Sweden is a parliamentary democracy and the constitution, dating from 1809, is based on four fundamental laws: the Instrument of Government; the Act of Succession; the Freedom of the Press Act (TF); and the Riksdag Act. The Swedish parliament is unicameral and elected by the Swedish people through proportional representation multi-member party lists for four-year term. The political preferences of the Swedish electorate are a traditional left-right dimension. The last Swedish general election in 2018, resulted in a hung parliament, with the left-red-green and centre-right coalitions each holding about 40 percent of the seats, and the Sweden Democrats holding the remainder. Until the Prime Minister Stefan Löfven announced his resignation in August 2021, Sweden was governed by a coalition of the Social Democrats and the Green Party in a joint agreement with the Centre Party and the Liberal Party from the centre-right coalition, the so-called January Agreement. On 29 November 2021, Magdalena Andersson was elected Prime Minister of Sweden but had to resign after an announcement by the Green Party, that they were leaving the coalition with the Social Democrats in response to the fact that the Centre Party surprisingly broke the agreement and supported the opposition's budget proposal. Magdalena Andersson once again assumed the office of Prime Minister on 30 November 2021 and was then confirmed as Sweden's first elected female head of government, but now as the head of a one-party minority government. The next ordinary Swedish parliamentary election will be held in September 2022.
- **Economic situation.** The Swedish economy has recovered strongly in the wake of the pandemic and the growth prospects for this year are basically stable. However, the insability in Europe is expected to have consequences for economic development in both Sweden and the rest of the world. Growth is expected to be lower than would otherwise have been the case, while inflation is expected to be higher. However, the Swedish economy is resilient thanks to strong public finances and the situation in the

labor market has improved during the beginning of the year. The GDP in Sweden amounted to SEK 5,383 billion (approx. EUR 522 million) in 2021. During the fourth quarter of 2021, GDP increased by 1.1 percent compared with the previous quarter. During the full year of 2021, the Swedish GDP grew by 4.8 percent.

- **Media Market.** A growing share of the Swedish population is turning away from traditional media – such as print and linear TV and radio – towards streaming services for audiovisual content, online radio, podcasts, and digital newspapers. There is a significant generation gap in the use of online and legacy media; the only online media that is in use more among older than younger people is the newspaper. The younger generations in Sweden prefer streaming services, podcasts, and online social networks. Digitalisation has created new streams for media financing and advertising investments. However, these investments do not necessarily end up with Swedish media companies, but global search engines and social media networks. This means that Swedish media lose revenues at the same time as they are competing with global actors to keep audience shares. Advertising investments in linear TV and radio are stable, whereas the advertising revenue has dropped by 70 percent in the Swedish newspaper industry (MedieSverige 2021).
- **Regulatory Environment.** The basic legislation for Swedish media is found in the Freedom of the Press Act and the Freedom of Expression Act. The Freedom of the Press Act covers print media and the Freedom of Expression Act covers radio, television, film and video. In addition, media companies have automatic constitutional protection in the Freedom of Expression Act for publications on the Internet. Since 2002, others can also apply for a publishing certificate for their website to receive the same protection. In addition to the constitution, there is the Radio and Television Act, which regulates radio and television broadcasts as well as pay-TV. The Radio and Television Act has also introduced European legislation in the field of media, the audiovisual directive for media services. Which includes a new chapter on video recording platforms, changes in regulations on television broadcasts and pay-TV, as well as on child protection and requirements for programs of European origin, accessibility for people with disabilities and on advertising and product placement. (SFS, 2020: 875).
- **COVID-19.** Sweden is slowly but surely starting to recover after two years of pandemic. As of April 1, 2022, Covid-19 ceases to be classified as a socially dangerous and generally dangerous disease. On March 31, 2022, the vaccination rate for Swedes who have taken at least 2 doses of vaccine was 84.8 percent (Public Health Agency of Sweden 2022). This, together with the coronavirus mutating and becoming less lethal, has meant that life in Sweden has begun to return to normal. At least when it becomes to the pandemic.
- **War in Ukraine.** Early on Thursday morning, February 25, Russian President Vladimir Putin ordered a military invasion of neighboring Ukraine. At the time of writing, this is a tragedy that we do not yet know the full consequences of. What we do know in terms of media pluralism, however, is that the information and propaganda war has reached completely new levels. This has manifested itself, among other things, through massive propaganda, censorship, and the closure of independent media in Russia, but also that the EU has decided that all Internet providers in Europe should block the state-controlled media channels RT and Sputnik. In Sweden, the Swedish Post and Telecom Agency (PTS) is the supervisory authority. The consequences of Sweden, a country with an indisputable tradition as defender of both freedom of speech and freedom of the press, instead choosing to use censorship are deeply worrisome.

3. Results of the data collection: Assessment of the risks to media pluralism

Sweden: Media Pluralism Risk Areas



The implementation of the 2022 Media Pluralism Monitor (MPM2022) in Sweden shows a generally low risk for media pluralism in the country: 75 percent (15) of the indicators demonstrate low risk, 15 percent (3) of the indicators demonstrate medium risk, and 10 percent (2) of the indicators demonstrate high risk. In general, the results are stable and have not changed to any great extent since the previous implementation in 2021, but where the most notably are changes in a positive direction for the indicators Protection to right to information (from 38 to 13% risk) and Media viability (from 46 to 32% risk). Regarding the considerable change in positive direction for the indicator Protection to right to information, a potential explanation could be that the higher risk measured in MPM2021 was an effect of the Covid-19 pandemic and that the positive change at the present MPM is a return to the risk level the indicator was at before the pandemic (16% in MPM2019/20).

The high and medium risk indicators are recorded in the **Market Plurality** area due to a lack of specific thresholds in media legislation to prevent a high degree of concentration of ownership and the unclear line between editorial and advertising content. In the area of **Social Inclusiveness**, the risk associated with the indicator Protection against illegal and harmful speech has increased from 31% to 42% risk, and is now in the medium risk band. However, the negative change in the MPM2022 is rather due to previous assessments underestimating the risk rather than to a real deterioration since the MPM2021.

Looking at the high risk indicators, the first is on News media concentration (96% risk) and the second is about Commercial and owner influence over editorial content (68% risk). Compared with previous MPM implementations, this is unfortunately not a change but risks that are relatively stable over time. The two medium risk indicators measure Transparency of media ownership (50% risk) and Online platforms concentration and competition enforcement (50% risk) and are also risks that are stable and has been estimated at the same risk levels in previous implementations.

Except for the Market Plurality area with a medium risk score of 59 percent, the **Fundamental** area shows a low risk score of 19 percent, the **Political Independence** area a low risk score of 11 percent, and the **Social Inclusiveness** area a low risk score of 22 percent risk.

When it comes to the low risk score of **Fundamental Protection**, the Swedish media system has a long regulatory tradition for media freedom and freedom of expression is explicitly recognized in the Swedish Constitution since 1991 with relatively few cases of violations to freedom of expression in Sweden in recent years. But as mentioned previously, there were negative effects of the Covid-19 pandemic for the indicator Protection to right to information in the implementation of MPM2021. Such negative effects suggest that the guarantees for fundamental protection such as the right to information may not hold when they are put to test. This is something to keep in mind and to handle for future crises.

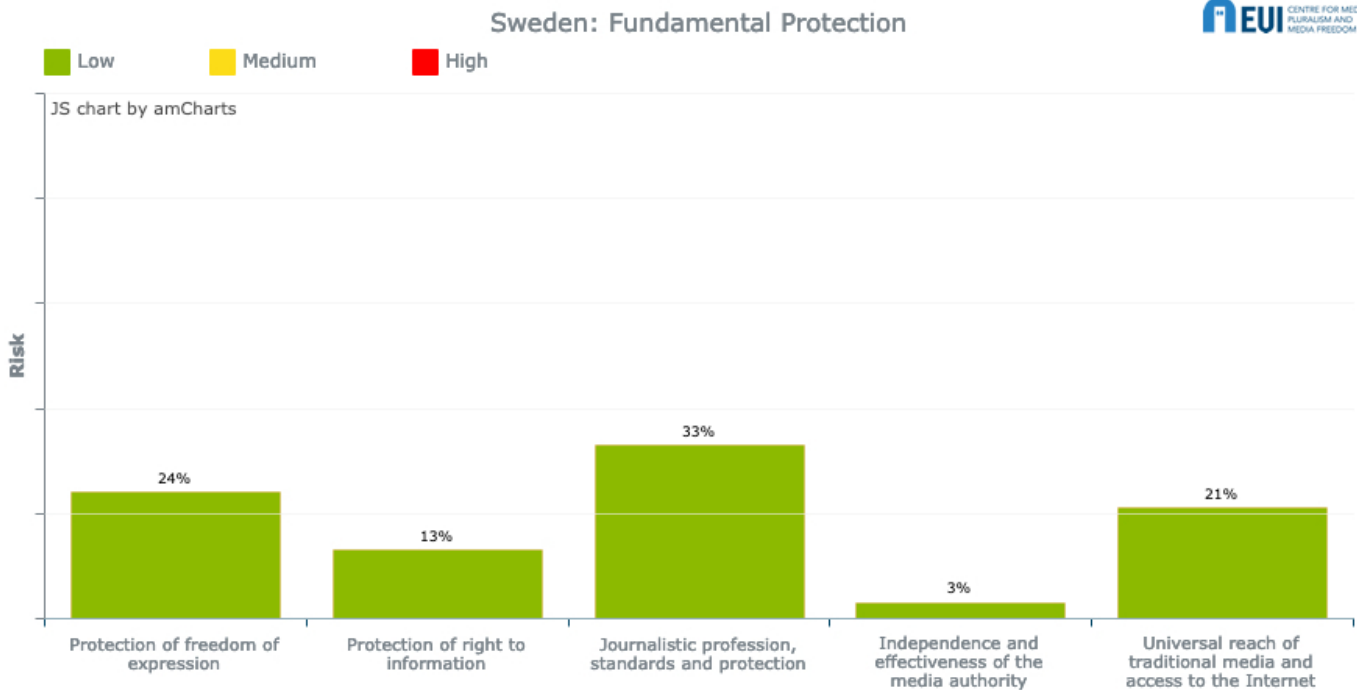
The **Political Independence** area scored a low risk (11%). The Swedish press subsidy which has been supplemented with the so-called "media support", that also includes online publications, seems to have worked out well. Another important factor is the broadcast licence regulating the operations of the Swedish PSM broadcast media in terms of independence from economic interests and from the state. However, in spite of a low general risk score for the overall Political Independence, a medium risk is detected with regards to regulation of conflict of interest and a high risk regarding regulation assuring the independence of news agencies from political influence.

Finally, apart from an increased risk with regard to the Protection against illegal and harmful speech indicator mentioned earlier, the low risk score of **Social Inclusiveness**, relates to the fact that regulations and the broadcasting licenses contribute to guaranteeing access to media for various groups, both in terms of access and space. There are also positive effects of efforts to grow the media and information literacy among the Swedish people.

As in previous MPM implementations in Sweden, the MPM2022 instrument shows potential warnings. But the overall state of media pluralism in Sweden can still be considered good.

3.1. Fundamental Protection (19% - low risk)

The *Fundamental Protection* indicators represent the regulatory backbone of the media sector in every contemporary democracy. They measure a number of potential areas of risk, including the existence and effectiveness of the implementation of regulatory safeguards for freedom of expression and the right to information; the status of journalists in each country, including their protection and ability to work; the independence and effectiveness of the national regulatory bodies that have the competence to regulate the media sector, and the reach of traditional media and access to the Internet.



Sweden scores low risk (19%) in the **Fundamental Protection** area and is an improvement of 4 percentage points compared with the previous year. The indicator that measures **Protection of freedom of expression** scores a 24 percent risk and is thus unchanged compared to the previous MPM2021. The Swedish media system has a long regulatory tradition for media freedom. There are two constitutional acts relevant to free speech for the Swedish media: The Freedom of the Press Act (SFS, 1949:105) and the constitutional law on Freedom of Expression (SFS, 1991:1469). Together with the constitutional law that regulates individual freedom of expression, these acts constitute the foundation of the Swedish media system. Freedom of expression has been explicitly recognized in the Swedish Constitution since 1991. However, in the MPM2021 implementation conducted during the COVID-19 pandemic, there were cases of local governments discouraging health and care workers from speaking with journalists (SVT; Nerikes Allehanda; Eskilstuna-Kuriren). This can be perceived as occasional accident at work but probably also tells us something about how well the long regulatory tradition for media freedom in Sweden works in practice during severe crises.

Sweden scores low risk on the indicator that measures **Protection of the right to information** (13%) and is a real positive change compared to the previous MPM2021 when the risk level was at 38%. The legal provisions to protect the right to information are clearly defined. So are the restrictions on the grounds of protection of privacy and confidentiality. Sweden follows the European Convention for the Protection of Human Rights and Fundamental Freedoms (SFS, 1994:1219). Recently, there has been substantial

improvement in that the Swedish parliament, with support from all parties represented, approved a new legislation to transpose the EU Directive on Whistleblowing into Swedish national law (SFS, 2021: 949). As part of this, the Swedish Work Environment Authority received a new assignment to provide funding to trade unions and employer organizations as well as civil society organizations working on issues relating to safety, work environment, against corruption and other abuses in the workplace.

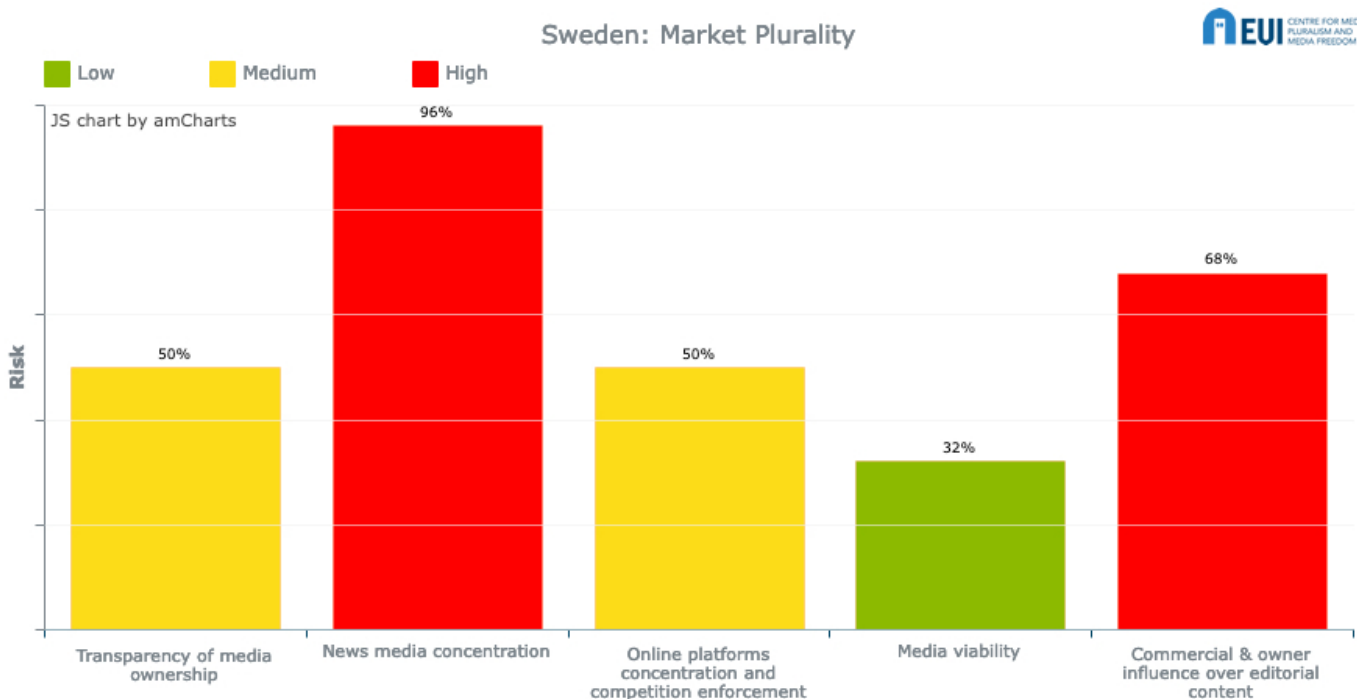
The indicator that addresses **Protection and standards of the journalistic profession** demonstrates a score of 33% risk which is three percentages lower than the previous year. Compared with other parts of the world, Swedish journalists continue to operate under very favorable conditions. However, studies conducted in recent years show that a large part of the Swedish journalists are exposed to hatred, threats, and insults. In a recent study from Lund University and Halmstad University, 70% of respondents state that they have been subjected to insults and 23% that they have been exposed to illegal threats in the past three years (Svensson & Björkenfeldt 2021). An earlier survey from the University of Gothenburg shows that of the journalists who were exposed, just over four out of ten have at some point refrained from covering certain subjects, individuals, or groups due to the risk of threats (Löfgren-Nilsson 2019).

The indicator for **Independence and effectiveness of the media authority** has a risk score of 3% and is thus unchanged compared to the previous MPM2021. Sweden has effective regulatory safeguards for the independence of the Swedish Press and Broadcasting Authority, limiting the risk of political and commercial interests (SFS, 2007:515; SFS, 2010:1062). The media authority consists of a chairman, six members and four deputies. All are appointed by the Swedish government. They are not politically appointed but come from different parts of the media industry and academia. The chairman of the board must be or have been a judge. The explicit objective of the media authority is to support freedom of expression, diversity, independence, and accessibility. In that the media authority examines whether the content of radio and television broadcasts complies with the rules contained in the broadcasting licenses and the Radio and Television Act.

Finally, Sweden scores low risk on the indicator for **Universal reach of traditional media and access to the Internet** (21%) and is thus unchanged compared to the previous MPM2021. The universal coverage of both the PSM and private media is regulated in the broadcasting licences, the Swedish Radio and Television Act (SFS, 2010:696) and the constitutional law on Freedom of Expression. Together with well-developed infrastructure and affordable ICT access, this guarantees a universal coverage of traditional media and access to the Internet in Sweden.

3.2. Market Plurality (59% - medium risk)

The Market Plurality area focuses on the economic risks to media pluralism which derive from a lack of transparency and the concentration of ownership, the sustainability of the media industry, the exposure of journalism to commercial interests. The first indicator examines the existence and effectiveness of provisions on the transparency of media ownership. Lack of competition and external pluralism are assessed separately for the news media (production of the news) and for the online platforms (gateways to the news), and we consider separately horizontal and cross-media concentration; the concentration of the online advertising market; and the role of competition enforcement. The indicator on media viability measures the trends in revenues and employment, in relation to GDP trends. The last indicator aims to assess the risks to market plurality that are posed by business interests, in relation to the production of editorial content, both from the influence of commerce and owners.



Overall, Sweden scores medium risk (59 percent) in the Market Plurality area and is an improvement of 3 percentage points compared with the previous year. The five sub indicators score between 32 and 96 percent risk. Sweden scores high risk on the indicators for **news media concentration** (96 percent) and **commercial and owner influence over editorial content** (68 percent).

The Covid-19 pandemic had negative consequences for the Swedish media market (IRM, 2020). As for the total revenues of the news media sector in Sweden, the assessment currently is that it roughly follows the economic development.

Reduced advertising revenues and declining finances mean an increased risk of cuts in the media industry. In the beginning of the Covid-19 pandemic, the data pointed to the fact that the main cuts during the pandemic was made among freelance journalists and journalists without permanent employment. What we instead can see in retrospect is that, for example, Swedish newspapers, despite declining advertising revenues, still managed to increase its viability during the pandemic. Thanks to quickly paid support measures, large parts of the Swedish newspaper industry were saved from the crisis (MedieEkonomi 2021).

As of April 1, 2022, Covid-19 ceases to be classified as a socially and generally dangerous disease. This has also meant that the Swedish media market is beginning to be able to recover financially.

The indicator on **transparency of media ownership** has a medium risk score of 50 percent and is thus unchanged compared to the previous MPM2021. The medium risk score relates to the lack of specific regulations on transparency for media companies in Sweden. As stated in previous MPM implementations, all companies are included and constrained to follow the general regulations in the Swedish Law of Financial Relations, the so-called Transparency Act (SFS, 2005:590) which requiring companies to be transparent about ownership structures and the Competition Act (SFS, 2008:579), which regulates the ownership concentration. However, this only deals with the problem in part and means that the Swedish regulation becomes a rather blunt tool when it comes to ensuring media pluralism.

In relation to this, Sweden scores high risk on the indicator for **news media concentration** (96 percent) and can be seen as a consequence of the problem raised above. This is not a change compared to the previous year, but the high risk remains. The level of news media concentration in Sweden is regulated in the Radio and Television Act (SFS, 2010:696, chapt. 4, 11§, 15§ and chapt. 13, 27§-28§) and in the broadcasting licenses. Moreover, the Swedish media sector is regulated based on the general Competition Act. However, if one read a little more in depth and look at how the criteria around ownership are defined in the mentioned regulations, it also becomes obvious that something must be done. As mentioned in previous MPM implementations, statements such as "ownership may not change more than to a limited extent" (contained in the Radio and Television Act) are simply not enough to ensure a reasonable level of news media concentration.

The indicator on **online platforms concentration and competition enforcement** produces a medium risk score (50 percent) and is thus unchanged compared to the previous MPM2021. Most notably for the level of risk for this indicator is still the difficulty in obtaining reliable data. However, and noted in previous MPM implementations, the specifications on online platforms concentration or cross-media ownership specifically are not aimed at media companies particularly in Sweden. The concentration online and cross-media ownership is covered by the Swedish Competition Act (SFS, 2008:579) and since all Swedish companies are treated equally and regardless of sector. Our assessment is that the general provision on competition does not face the digital challenge or addressing this problem fully.

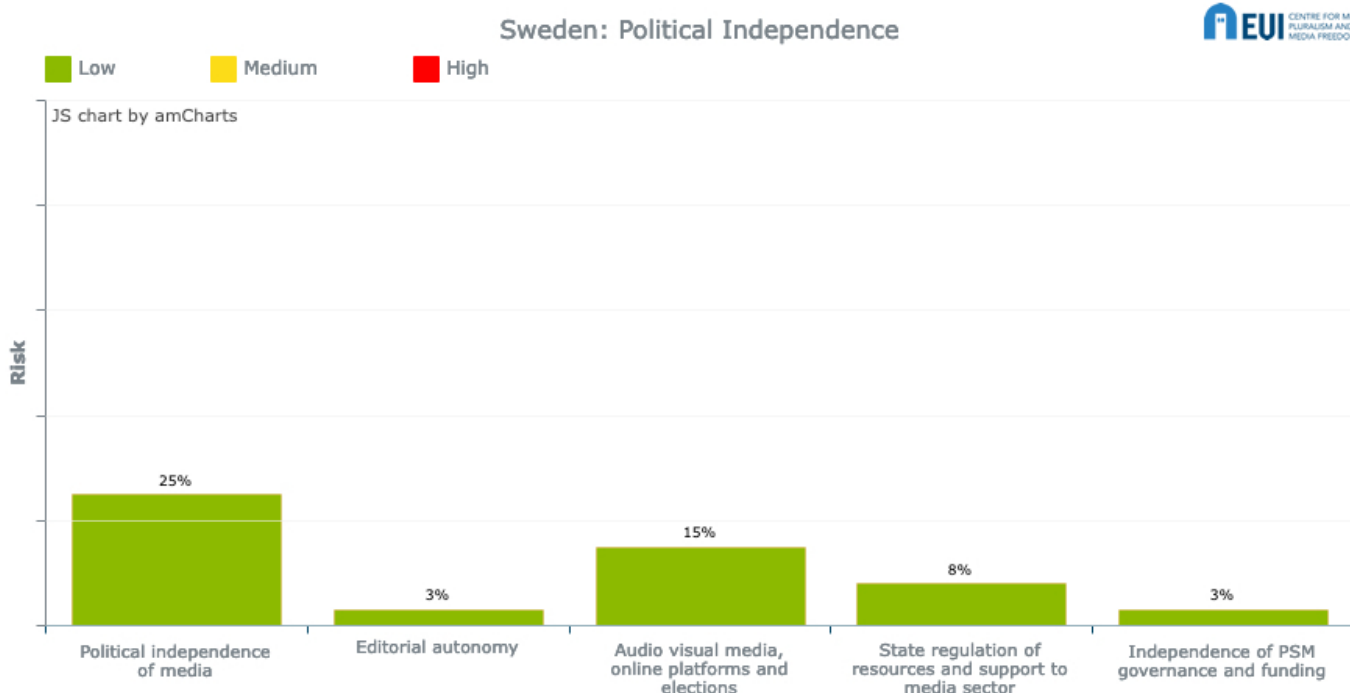
Sweden scores low risk on the indicator for **media viability** (32 percent) and is an improvement of 14 percentage points compared to the previous year. Much of this change can be deduced from the economic situation that appeared in relation to the Covid-19 pandemic. In the latest report from Reuters Institute, Sweden (together with Norway) had the highest growth when it comes to paying for news online (Reuters Institute, 2021). In accordance with this, other reports show that a growing share of the Swedish population turning towards streaming services for audiovisual content, online radio, podcasts, and digital newspapers. Digitalization has created new streams for media financing and advertising investments. The problem is that these investments not necessarily end up with Swedish media companies, but global search engines and social media networks. Therefore, Swedish media lose revenues at the same time as they are competing with global actors to keep audience shares.

Finally, Sweden scores high risk on the indicator for **commercial and owner influence over editorial content** (68 percent) and is thus unchanged compared to the previous MPM2021. First, there are professional rules that all members of the Swedish Union of Journalists (SJF) follow. These rules include elements to ensure independence and impartiality and violations can be notified within three months of the

event at the journalists' ethics committee. Second, and highlighted in previous MPM implementations, it is still challenging where to draw the line between advertorials and editorial content. It is hard for the Swedes to see the difference while affecting credibility.

3.3. Political Independence (11% - low risk)

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and, more generally, of political power over the functioning of the media market and the independence of the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



Sweden scores low risk (**11%**) in the **Political Independence** area and is thus unchanged compared to the previous MPM2021. The five sub indicators score between 3 and 25 percent.

The indicator for **Political independence of media** scores low risk in Sweden (**25%**) and is unchanged compared to the last years assessment. The risk score is related to the lack of regulation, rather than to actual malpractice. Since some digital native media are dependent on state subsidies for their survival there is a potential threat to their independence. On the other hand, there are no current examples of conflicts of interest between media owners and ruling parties, partisan groups, or politicians.

The indicator for **Editorial autonomy** scores a low risk (**3%**) and is unchanged compared to the previous MPM2021. The Swedish Freedom of the Press Act (SFS, 1949:105) regulates autonomy in appointing and dismissing editors-in-chief. Additionally, a large number of media and journalist organizations (Sveriges Radio AB (SR), Sveriges Television AB (SVT) och Utbildningsradion AB (UR), Publicistklubben (PK), Svenska Journalistförbundet (SJF), Svenska Tidningsutgivareföreningen (TU), Sveriges Tidskrifter) have jointly developed a number of self-regulatory/voluntary codes of conduct for stipulating editorial independence, which the majority of Swedish media are following.

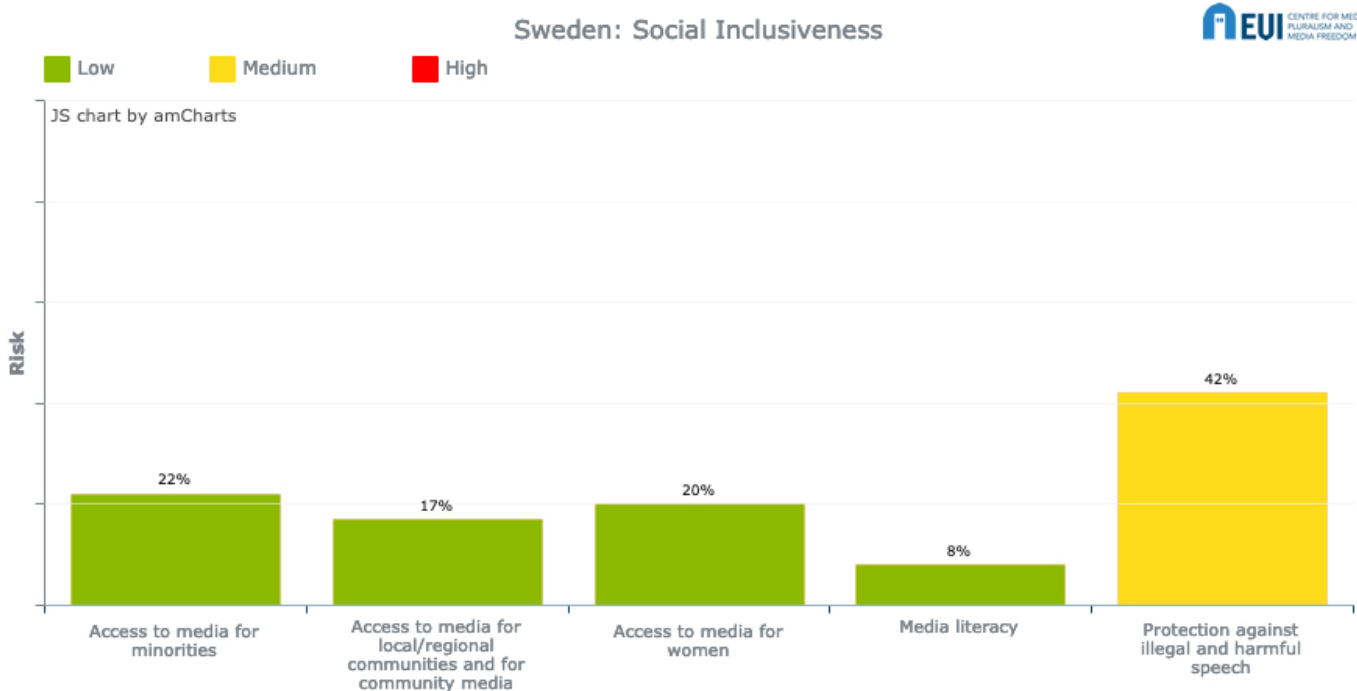
Sweden scores a low risk on the indicator for **Audio visual media, online platforms and elections (15%)** and is an improvement of 2 percentage points compared to the previous year. The lack of concern for audio visual media in relation to this indicator is confirmed in several annual evaluations of Swedish media news content. The Media Election Survey, which is conducted every parliamentary election in Sweden since 1979, shows that both PSM and commercial media generally offer proportional and non-biased representations (Johansson & Strömbäck, 2019). On the other hand, there is a high risk detected with regards to the rules for political parties, candidates and lists competing in elections to report on campaign spending on online platforms in a transparent manner. Moreover, there are no examples that confirm any examinations done by the Swedish Authority for Privacy Protection regarding the use of personal data for electoral campaigning purposes by political parties. The analysis evidences the need for specific regulations that ensure transparency about campaign spending and techniques used in political campaigns online.

Sweden scores a low risk on the indicator for **State regulation of resources and support to media sector (8%)** and is unchanged compared to the previous MPM2021. Since February 1, 2019 the Swedish press subsidy has been supplemented with the so-called "media support" that also includes online publications (SFS, 2018:2053). The state advertising is distributed to media outlets based on the set of criteria stipulated in the law. However, whether they are fair or not has, so far as we can see, not been investigated in practice. The media support is an extended innovation and development support for local journalism in areas that lack or have weak journalistic coverage. The grants are technology-neutral and is available to general news media regardless of content or distribution. Which means that more media than print newspapers can seek support.

Finally, the indicator for **Independence of PSM governance and funding** acquires a low risk score **(3%)** and is unchanged compared to the previous MPM2021. The broadcast licences regulate the operations of the Swedish PSM broadcast media in terms of independence from economic interests and from the state. Media independence is also regulated by the Swedish Radio and Television Act (SFS, 2010:696) and the Freedom of Expression Act (1991:1496). The appointment procedures are well defined and provide for the independence of the Swedish PSM boards and management. There are no indications or any examples of conflicts concerning appointments or dismissals of managers and board members of the Swedish PSM.

3.4. Social Inclusiveness (22% - low risk)

The Social Inclusiveness area focuses on the access to media by specific groups in society: minorities, local and regional communities, women and people with disabilities. It also examines the country's media literacy environment, including the digital skills of the overall population. Finally, it also includes new challenges arising from the uses of digital technologies, which are linked to the Protection against illegal and harmful speech.



On average, Sweden scores low risk (22%) in the **Social Inclusiveness** area and is a decline of 2 percentage points compared with the previous year. The five indicators score between 8 and 42 percent.

Sweden scores low risk on the indicator for **Access to media for minorities** (22%) and is unchanged compared to the previous MPM2021. The Swedish broadcasters have a responsibility to consider the needs of both physically challenged peoples as well as the national linguistic and ethnic minorities. In Sweden, access to airtime on PSM channels for social and cultural groups are guaranteed in practice. The Swedish PSM broadcasting licenses contain conditions relating to airtime of the five minority languages: Sami, Finnish, Meänkieli, Romani Chib and Yiddish. With an agreement with SR and UR, SVT broadcast news in Finnish and Sámi. SR broadcasts news programs in Romani Chib and Meänkieli (SVT, 2021). In the charter/license 2020-2025 for the Swedish PSM there is an explicit clause that demands PSM broadcasters to have a specified obligation to provide news to an increased number of minority groups in Sweden.

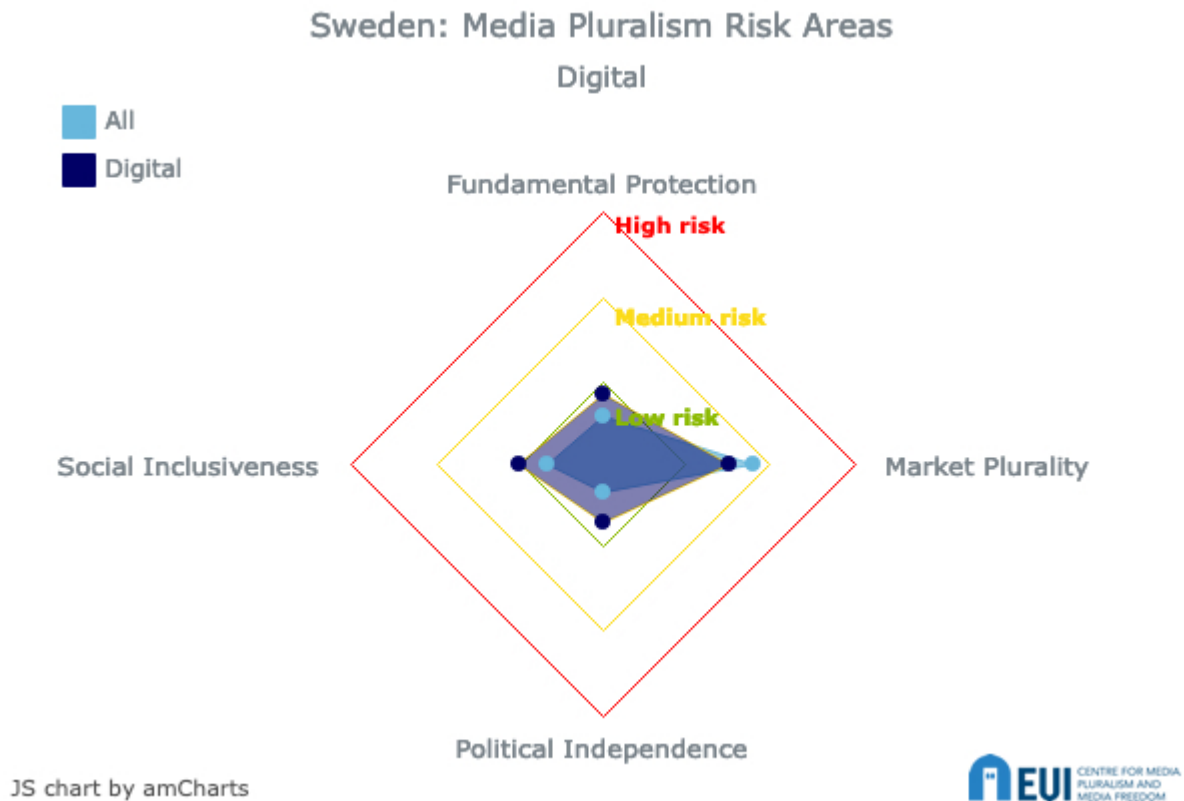
The indicator for **Access to media for local/regional communities and for community media** scores a low risk (17%) and entails an increased risk of two percentage points compared to the previous MPM2021. In Sweden, the independence of community media encompasses both diversity in media content and media providers. PSM also has a specific agreement to offer a diverse range of programs. These should reflect the diversity of the entire country and characterized by a high level of quality, versatility and relevance and be accessible to all. The increased risk for this indicator was primarily due to the fact that the Swedish media support was reduced by SEK 500 million in 2021.

Sweden also scores low risk on the indicator for **Access to media for women** (20%) and is unchanged compared to the previous MPM2021. The Swedish media sector is covered by the Swedish law on equal rights (SFS, 2008:567). Moreover, the broadcast licenses includes more explicit requirements that program content should promote diversity and equality which in practice is interpreted as a balanced representation of women and men. Additionally, PSM has a comprehensive gender equality policy covering both personnel issues and programming content.

The indicator for **Media literacy** produces a low risk score in Sweden (8 percent) and is thus unchanged compared to the previous MPM2021. The Swedish Government has commissioned the Swedish Media Council to strengthen the work for increased media and information literacy (MIK) by developing collaboration and the authority's activities in this area. The assignment includes creating a network for stakeholders working on issues related to MIK, building a platform for knowledge and information dissemination, further mapping developments in the MIK area and developing the authority's MIK resources.

Finally, Sweden scores medium risk on the indicator for **Protection against illegal and harmful speech** (42 percent) and is an increase in risk by 11 percentage points compared to MPM2021. Illegal and harmful speech is applied in the Swedish Freedom of Expression Constitutional Law (SFS, 1991:1469) and in chapter 5 in the so-called Brottsbalken (SFS, 1962:700). It is important to emphasize that the problem with illegal and harmful speech must be understood in relation to the platforms used and the difficulties in claiming responsibility online. The Swedish legislation makes it possible to claim responsibility from the provider if the person behind illegal and harmful speech cannot be held liable but is still not widely applied. It is also important to note that this negative change in risk score is mainly due to previous assessments underestimating the risk rather than to a real decline since the MPM2021.

4. Pluralism in the online environment: assessment of the risks



Sweden scores low risk (28%) in the Fundamental Protection – Digital area.

As to the Fundamental Protection area, the risk level has declined by 4 percentage points compared to MPM2021. Freedom of expression online is defined in the Swedish law and in accordance with international and regional human rights standards. The Swedish regulation also includes more detailed laws for the Internet and involves violations of rights online and offline. The Swedish people have access to effective legal remedies to address potential violations. ISPs, filtering, and removals of online content are regulated in the Act of Electronic Communication (SFS, 2003:389) and in the Act of the collection of data on electronic communication in the law enforcement intelligence (SFS, 2012:278). Currently, the Swedish state is not filtering or removing online content in an arbitrary way. But as mentioned in the introduction to this report, EU has decided that all Internet providers in Europe should block the Russian state-controlled media channels RT and Sputnik. This does not affect the level of risk of the present MPM implementation but will most likely do so in the future.

When it comes to the protection of journalists online, the Swedish Parliament has stated support to proposal 2018/19:2026 and to strengthen the protection of threatened journalists and announced this to the Swedish government. Threats, harassment and violence against journalists and the media have escalated around the world in recent years and Sweden is no exception. In the annual report on press freedom from Reporters Without Borders from 2018, and which charts online hatred against journalists in 32 countries. The Nordic countries, all of which are at the top of the press freedom index, are nevertheless particularly vulnerable to online harassment. The situation in Sweden is highlighted as particularly serious.

Finally, when it comes to the GDPR and regulations on net neutrality, GDPR has been implemented since May 25, 2018. In Sweden, it is directly applicable as a law with the explicit provision that the Freedom of the Press Act (SFS, 1949:105) and the Freedom of Expression Law (SFS, 1991:1469) take precedence over

the GDPR. This means that both constitutionally protected and unprotected media will be able to use personal data in the same way as before the implementation of the new Data Protection Act.

Sweden scores medium risk (50%) in the Market Plurality – Digital area.

The risk level for the Market Plurality area has declined with 1 percentage point compared to MPM2021. There are two administrative authorities administering ownership limitations and hearing complaints. The Swedish Media Authority with a special focus on monitors the media companies and the Swedish Competition Authority monitoring all Swedish companies.

As mentioned previously, both in this and previous reports, the Swedish law does not contain specific provisions requiring the disclosure of ownership details in the Swedish news media sector. Instead, the so-called Transparency Act, applies to all Swedish companies and regardless of media type (SFS, 2005:590). Thus, there is a need for specifications both in terms of criteria of what could be interpreted as a “healthy” concentration of media ownership and in terms of treating media companies, based on the importance of media plurality, as particularly important.

Something that instead helps to reduce the risk of the media market plurality is the indicator measuring online platforms and competition enforcement. Within this area, the direct access to the news online contributes to lower the risk. There are several recurring studies that show that Swedes use digital news services frequently and that they first and foremost receive news directly from the original source rather than gain access to news via social media. In the latest report from the SOM Institute 87% of the Swedes stated that they used a digital news service at least once a week and (Swedish Trends 1986-2021). This could be interpreted as mainly direct access since people rather mix their use of social media with digital news, not the other way around. The interesting thing here is that 78% stated that they used social media at least once a week. We do not know exactly what the Swedes do on social media, but what we know is that they read news among other things. We also know that most of the news on social media leads to traditional news media in the end. The assessment is therefore that it is accessed mainly direct.

Sweden scores low risk (21%) in the Political Independence – Digital area.

There is no political control of the Swedish digital native media as such. At the same time, there is a lack of specific regulations of the transparency of campaign spending on online platforms for political parties, candidates and lists competing in the Swedish elections. Moreover, this lack of regulations also includes transparency on which techniques that are used in political campaigning online. As stated in previous reports, this does not necessarily mean that news media are politically dependent, but points toward a risk in this area. Thus, there is a static need to take a more general approach on transparency about campaign spending and techniques used by political parties, candidates and lists in political campaigning online.

Sweden scores low risk (34%) in the Social Inclusiveness – Digital area.

The risk level for the Social Inclusiveness area has increased with 6 percentage points compared to MPM2021. More than 72 percent of the Swedish population has basic or above basic overall digital skills (Eurostat, 2019). On the one hand, the Swedish government has proposed amendments to the so-called Brottsbalken (SFS, 1962:700), which means, among other things, that anyone who provides an interactive service on the Internet, such as certain social media, must be obliged to remove messages that clearly constitute unlawful threats or intrusions. There are also several media literacy and educational initiatives

aiming to prevent and counteract hate speech and disinformation. In previous MPM implementations the so-called Global MIL Week run by the Swedish Media Council has been mentioned as an example of initiatives to raise awareness of racism and similar forms of hostility on the Internet among children and young people. However, as mentioned previously, the increased risk level instead relates to difficulties in claiming individual responsibility online.

5. Conclusions

The implementation of the 2022 Media Pluralism Monitor data collection in Sweden shows an overall low risk for media pluralism in the country. At the same time, there are areas that already demonstrate high risk and other areas with the potential to demonstrate higher risks in the near future.

In the area of **Fundamental Protection**, there was previously a risk which related to limitations of the regulatory framework to protect whistleblowers. In the MPM2021 implementation, there has been substantial improvement in that the Swedish parliament has approved a new legislation to transpose the EU Directive on Whistleblowing into Swedish national law. Another area where it is also possible to see a certain, albeit small, improvement is the **protection and standards of the journalistic profession**.

Recommendations:

- **Despite improvements, there is still an urgent need to strengthen the legal protection against hatred, threats and insults of the Swedish journalists.**

In the area of **Market Plurality**, thanks to rapid economic support measures, the Swedish media have managed to get through the pandemic, even strengthened in some respects. Within this area, the risk instead lies in the need of strengthening the Swedish legislation on news media concentration.

Recommendations:

- **To reform the legislation so that it distinguish between ownership concentration and takes news media ownership concentration into account more specifically and to produce a clear and unambiguous definition of excessive concentration of ownership.**

The **Political Independence** is the area with the lowest level of risk in Sweden. However, there is a potential risk within the indicator that measures the political independence of media. This potential risk relates to the lack of regulation rather than to actual malpractice. There are no current examples of conflicts of interest between media owners and ruling parties, partisan groups, or politicians. But, with increased polarization, some form of regulation is probably needed to be able to guarantee political independence of media also in the future.

Recommendations:

- **There is a static need to take a more general approach on transparency about campaign spending and techniques used by political parties, candidates and lists in political campaigning online.**

In the **Social Inclusiveness** area, Sweden scores medium risk on the indicator for **Protection against illegal and harmful speech**. Illegal and harmful speech is regulated in the Swedish constitution which also has been updated to be better adapted. Thus, it is possible to claim responsibility from the provider if the person behind illegal and harmful speech cannot be held liable but is still not fully applied.

Recommendations:

- **Clarify the extended possibilities to demand responsibility for illegal and harmful speech online in the existing, albeit revised, legislation that already exists.**

Openness in society, like much else, was subjected to severe stress during the Covid-19 pandemic. This was also reflected in the area of Fundamental Protection of right to information in MPM2021. However, in the implementation of MPM2022, the conditions have changed once again, but this time in a positive direction. Swedish society has reopened.

Instead, new clouds of instability have appeared in our immediate vicinity. On February 25, Russian President Vladimir Putin ordered a military invasion of neighboring Ukraine. In terms of media pluralism, this has led to an information and propaganda war on levels we have not witness since World War II. Among other things this has manifested itself through massive propaganda, censorship, and the closure of independent media in Russia, but also that the EU has decided that all Internet providers in Europe should block the state-controlled media channels RT and Sputnik. The consequences of Sweden, a country with an indisputable tradition as defender of both freedom of speech and freedom of the press, instead choosing to use what can be considered as censorship are deeply worrying. This is not at the same time something that has had repercussions in the present implementation of MPM2022 but will most likely affect future ones.

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ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2022 CT Leader
<i>Mathias A.</i>	<i>Färdigh</i>	<i>Assistant Professor</i>	<i>University of Gothenburg</i>	X

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and recognized experience in the field of media. The role of the Group of Experts was to review the answers of the country team to 16 variables out of the 200 that make up the MPM2022. Consulting the point of view of recognized experts was aimed at maximizing the objectivity of the replies given to variables whose evaluation could be considered as being subjective, and, therefore, to ensure the accuracy of the final results of the MPM. However, it is important to highlight that the final country report does not necessarily reflect the individual views of the experts who participated. It only represents the views of the national country team that carried out the data collection and authored the report.

First name	Last name	Position	Institution
<i>Anna</i>	<i>Widmark</i>	<i>Ombudsman</i>	<i>Swedish Union of Journalists</i>
<i>Jesper</i>	<i>Strömbäck</i>	<i>Professor</i>	<i>Department of Journalism, Media and Communication, University of Gothenburg</i>
<i>Mart</i>	<i>Ots</i>	<i>Associate Professor</i>	<i>MMTC, Jönköping International Business School, Jönköping University</i>
<i>Stefan</i>	<i>Eklund</i>	<i>Editor in chief</i>	<i>Borås Tidning</i>
<i>Henrik</i>	<i>Selin</i>	<i>Statelist</i>	<i>Sveriges Television (SVT)</i>

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