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Public Service Media in the Crosshairs : National policymaking process, the EU competition regulation, and the case Of Yle's text-based news content

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Challenges and Developments in Public Service Journalism

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Association of Public Media
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Edited by

**Alessandro D'Arma, Maria Michalis,
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Michael-Bernhard Zita**



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Chapter 8

Public Service Media in the Crosshairs: National Policymaking Process, the EU Competition Regulation, and the Case of Yle's Text-Based News Content

Marko Ala-Fossi, Jockum Hildén, Minna Horowitz, Kari Karppinen, Riku Neuvonen, Hannu Nieminen

Summary

The role of public service media (PSM) online, and specifically the provision of text-based news content, has been under scrutiny in many European countries. This chapter focuses on the Finnish Broadcasting Company (Yle) as a case study of the dynamics between European competition law, national PSM policymaking, and lobbying from the private media industry. The chapter examines the process that led to a legal amendment limiting Yle's text-based services online and its impact on the conditions of public service journalism. As part of a series of complaints about unfair competitive advantage by the private media industry, the Finnish Media Federation, an advocacy organisation for private companies in the media and printing industries, originally filed a complaint with the EU Commission in 2017, claiming that Yle's text-based online content conflicts with EU state aid rules. The chapter first addresses how competition law has been used to restrict PSM online in other EU member states. It then describes the Finnish case, highlighting the key problems of the amendment accepted by the Finnish Parliament in 2022. Finally, we discuss what the case means more broadly in terms of PSM policy and public service journalism. We argue that the case of Yle exemplifies opaque communication policy decision-making and presents a danger of curbing the scope of PSM through inaccessible and technocratic processes instead of open public debate. The case can also be seen as part of a continuing transition in Finland from the so-called media welfare state to the competition state.

Introduction

This chapter discusses the attempts of the private media industry to challenge the remit of public service journalism with reference to the EU state aid rules. While public service media (PSM) have been under commercial and political pressure in many European countries for a while (for example, Wilson, 2020), Finland has been a markedly strong and mature PSM country, with high audience reach and trust (for example, Horowitz et al., 2021), as well as broad political support among the main parliamentary parties. Nevertheless, private media companies in Finland have increasingly criticised PSM for unfair competitive advantage.

Reflecting a broader tension between European competition law and PSM, the Finnish Broadcasting Company (Yleisradio or Yle) has been targeted with a series of complaints about unfair competitive advantage by the private media industry. These have included inquiries about the appropriateness and market impact of Yle's text-based online content, personalisation services, the streaming service Yle Areena, educational content, and audio services.

As a case study, this chapter focuses on the process that led to a legal amendment limiting Yle's text-based services online and its impact on the conditions of public service journalism. The Finnish Media Federation, an advocacy organisation for private companies in the media and printing industries, originally filed a complaint with the EU Commission in 2017, claiming that Yle's textual online content conflicts with EU state aid rules. After non-public discussions with the EU Commission's Directorate-General for Competition, the Finnish government proposed to introduce an amendment to the Act on Yleisradio Oy (1380/1993), which would limit Yle's mandate to provide text-based web content that is not directly related to audiovisual content. The ensuing public online consultation raised several arguments against the proposal. Professional and civil society organisations, researchers, and individual citizens, among others, expressed concerns that the amendment would limit freedom of speech and widen inequalities related to access to news, in ways that contradict the traditional role of media in the Nordic welfare states (see, for example, Nieminen, 2019). The debate also led to an official citizens' initiative to counter the government proposal. Nevertheless, the amendment was eventually accepted in the Finnish Parliament in 2022.

In Europe, text-based news by PSM has come under scrutiny due to the introduction of the so-called *ex ante* test, according to which significant new services should be analysed based partly on their public value but also on what market impact the new service might have. The question of online news has mostly been left for the member states to decide, the only requirement being that the public service remit is sufficiently well defined. This approach has been keenly used by some member states to narrow PSM's remit (Donders et al., 2020). What makes the Yle case interesting is that it appears that the Directorate-General for Competition has been more involved in defining the scope of acceptable online services than has usually been the case, which may have future implications for the dynamics of power between national PSM policy and EU competition rules.

In this chapter, we first address how competition law has been used to restrict PSM online, including an overview of different approaches in select EU member states. We then describe the Yle case, highlighting the key problems of the amendment to the Act on Yleisradio Oy.

Apart from the specific issue of text-based content, we argue that the case also has broader significance in terms of PSM policymaking and the perception of public service journalism. In particular, it raises issues about the frameworks and criteria used to assess the role of PSM journalism in society. As Puppis and Ali (2023) note, current conflicts regarding the remit and legitimacy of PSM are also about controlling the agenda and narratives of policy debates. Drawing on the discursive approaches to policy analysis (for example, Bacchi, 2009; Fischer, 2003), it can be argued that, in addition, the case exemplifies the power of framing and the clash of conflicting frameworks for assessing PSM. While the critics of the government proposal largely justified their concerns with reference to socio-political and cultural arguments, the government on the other hand, framed the issue more narrowly as a technical matter of compliance with EU rules, which in turn allowed it to sidestep any broader arguments about the value of PSM.

Finally, the chapter argues that the case may indicate a continuing transition in Finland from the so-called media welfare state to the competition state. Although decisions on PSM funding and remit are still in national competence, they also tend to be interpreted from the viewpoint of competitiveness rather than as part of national media and cultural policy. The process exemplifies opaque policymaking, already observed in earlier media policy processes, and risks curbing the remit of PSM through inaccessible, technocratic processes.

Restricting public service media with competition law

The situation with Yle demonstrates the tension between European competition law and PSM. While public service is often portrayed as an exception to state aid rules, its definition is deeply politicised.

The Amsterdam Protocol on Public Service Broadcasting¹ provides the necessary exception to the general ban on state aid in EU law, but its interpretation and its relationship with the general state aid restrictions in EU law are complex. Part of the problem has to do with the fact that the Commission has been inspired by the case law on state aid of the Court of Justice of the European Union (CJEU) when writing its communications on the subject. These soft law instruments are impactful in practice because the Commission follows them when determining whether the funding of PSM is permissible. Still, it is worth remembering that such guidelines are not binding on the CJEU.

The Amsterdam Protocol entails three key aspects about public broadcasting and state aid. Firstly, the Protocol stipulates that the prohibition of state aid does not apply to public service broadcasting. Notably, public service broadcasting is not solely defined as a service of general economic interest (SGEI) according to article 106.2 of the Treaty of the Functioning of the European Union (TFEU). Although public service broadcasting fulfils the criteria of an SGEI, public service broadcasting is subject to specific conditions. Importantly, the Amsterdam Protocol contains a requirement to define what public service broadcasting entails.

The second part of the Protocol specifies that 1) the funding must be granted to a broadcasting organisation; 2) the funding is conditional on a public service remit; and 3) the remit is conferred, defined, and organised by each member state. This entails a wide margin of manoeuvre for the member states. The margin of discretion follows the doctrine of the CJEU (see Joined Cases C-197/11 and C-203/11). Failing to provide a definition would be contrary to EU law, but the actual definition is provided solely by the member state. In theory, it would also be possible to provide public service funding to several commercial broadcasters in exchange for the provision of public service content.

In its Communication, the Commission (2009) announced that it would restrict its evaluation of the second part of the Amsterdam Protocol to 'manifest errors'. The definition of manifest errors is quite unclear and, up until now, it has been about the business model of the broadcaster (EU Commission, 2007). Whereas the provision of services is up for the member states to decide, the Amsterdam Protocol also contains a proportionality test, which leads us to the last part.

The last part of the Protocol is hard to interpret because it contains a condition that is conditional in and of itself: the public service funding cannot affect trading conditions and competition to an extent that is contrary to the *common interest*, but this balancing test needs to take into account the realisation of the remit that the member state has conferred on PSM. This means that the goalposts shift depending on the remit. If the remit places a high burden on PSM, it also means that more market distortion is probably permissible.

The common interest, according to the Commission (2009, p. 16), is the ‘plurality of balanced public and private media offer’. In other words, if the funding of PSM would in and of itself challenge the existence of the private media offer, it could be deemed contrary to the common interest. Following the case law of the CJEU, it does not mean state aid is impermissible as soon as part of the provision of public services can be provided under market conditions.² Rather, the *entirety* of the service obligations must be considered. Furthermore, the guidelines issued by the Commission can be challenged by the member states (Bruzzone & Boccaccio, 2020, p. 88). Nevertheless, over-compensation is deemed incompatible with EU law if the revenues notably exceed the costs of the public service offering.

The 2009 Communication also famously introduced the *ex ante* test requiring that new services should be judged not only on the merits of their public value but also on the likely impact on the commercial market. However, neither primary law nor CJEU cases support it. To reiterate, the CJEU has, on multiple occasions, stated that the public service obligation needs to be considered in its entirety. The *ex ante* tests were introduced to put a limit on what, exactly, public service broadcasters may provide online (Schulz, 2009). While it is up to the member state to define the public service remit, state aid investigations have resulted in *ex ante* tests being introduced as a type of compromise: states are not required to necessarily define the scope of online services more clearly, but the Commission still requires them to make some sort of assessment of the market impact. The CJEU on the other hand has been far more lenient in accepting definitions of the public service remit than the Commission (Donders & Moe, 2014).

The public service remits of EU member states

It is fundamentally up to the member states to decide what is included in the PSM remit, and a review of European practices shows a great variety. In the following, we draw on examples from the other Nordic countries and a few

other European countries to highlight this variety. Although not comprehensive, the review illustrates that there is no obvious coherence in the interpretation of the EU competition rules.

In the Nordic countries, there is a tendency to review each other's media regulations when drafting new media policies. Still, they too differ in the way the remit for PSM are defined. In Norway, the online activities of the public service broadcaster NRK are not limited at all, and no fundamental distinction is made between text-based content and audiovisual productions. The defining aim is that all content should strive towards fulfilling the public service remit, and that is not limited to a specific type of content. In Sweden, the activities of PSM are divided into three categories: core services, complementary services, and subsidiary services. Text-based online news is in the complementary category (Swedish Government Office, 2018, p. 28).

In contrast, the Danish 'public service contract' is much more oriented towards the market failure thesis, explicitly stating that the public service broadcaster DR should not compete with private actors unless it serves a clear public service goal. Although the updated public service contract initially required DR to abstain from publishing long text-based articles online, the contract terms were later redacted, removing the controversial restriction (Eller, 2019). The provision had been added out of competition concerns but was later thought to infringe on the 'arm's length' principle.

Similarly, the decree defining the objectives of France Télévisions specifies that it is its objective to distribute and develop online services that 'prolong, complete and enrich its audiovisual content'.³ Radio France has a similar provision in the decree defining its objectives.⁴ Moreover, France Télévisions' public service contract establishes the importance of providing news online (France Télévisions, 2021).

The Italian public service broadcaster's (RAI) service contract for 2018–2022 also underscores that the broadcaster should fulfil its objectives on all relevant platforms.⁵ The focus lies in making broadcasts more available online (article 5). Regarding news, article 25e of the contract provides that RAI should 'strengthen its news offer on the web' and combat the spread of fake news.

In the UK, the BBC is tasked with providing high-quality content online, and no reference is made to restricting the online offering. The French and British approaches are in stark contrast to the German and Austrian regulation of the online presence of PSM. Germany's *Rundfunkstaatsvertrag* explicitly provides that the online offering of PSM may not be 'press-like' (*presseähnlich*) and the focus should be on audiovisual content.⁶ Austria's

ORF-Gesetz also describes that its online news offering cannot be comparable to the output of newspapers and magazines.⁷ The federal news reports are further restricted to eighty daily reports per federal state per calendar week. Moreover, comprehensive local reporting is forbidden.

In the Flemish-speaking parts of Belgium, the public service broadcaster contract specifically endorses the provision of content on all relevant platforms (VRT & Vlaamse overheid, 2016, p. 18). However, the contract specifies that the audiovisual content is the ‘foundation of the digital offering’ and that the public service broadcaster VRT should provide links to other journalism providers (VRT & Vlaamse overheid, 2016, p. 19). The Flemish model is more directed towards cooperation with private media companies, whereas the Austrian and German models aim to forbid the deployment of competing products. Both German and Flemish-speaking Belgian broadcasters have been under scrutiny by the European Commission (2007; 2008).

In sum, there seems to be a clear connection between state aid cases and recent updates to broadcasting laws and contracts. In countries where public service broadcasters have been scrutinised by the Directorate-General for Competition, the remits of public service broadcasters have become more tightly regulated. Yet it seems clear that, instead of any coherent European approach, the current situation across Europe reflects what has been called ‘the European communication (dis)order’ (Dreyer et al., 2020), characterised by a complex and contradictory mix of national media systems, varying interpretations of the Amsterdam Protocol, and diverse demands from other stakeholders.

The Act on Yleisradio Oy and the case of text-based content

Finland is one of the leading digital societies in Europe and Yleisradio, the Finnish PSM, has been a frontrunner in establishing successful digital PSM. While Finnish people have a very high level of trust in the news media and the newspapers in Finland have been economically rather successful despite lower public subsidies than in other Nordic countries, the Finnish press industry continues to struggle with the digital transition. This has been one of the main reasons for the increased tension between the press industry and Yleisradio (Ala-Fossi et al., 2023). Unlike its Nordic neighbours, Finland has since the 1990s cut down both direct and indirect public support for media using two separate fiscal crises of the state as justification for abandoning traditional media welfare policy (Ala-Fossi, 2020). This is one of the reasons

why the economic challenges of the Finnish commercial news media are now undeniable and quite severe, both nationally and locally (for example, Eromäki & Kavander, 2023; Sillanmäki, 2023), and Yle cannot alone guarantee a healthy media system or diverse journalistic contents for citizens. Still, it is not insignificant that in a nineteen-country comparative study, Finland ranks the highest in terms of audiences' trust and their perceptions of the personal and societal importance of PSM (Nielsen & Newman, 2023). These results echo earlier Finnish research on media trust (for example, Horowitz et al., 2021).

When the Act on Yleisradio Oy was passed in December 1993, it required Yle to make 'full-service broadcast programming available to everyone on equal terms'.⁸ The act was the first actual law concerning public broadcasting in Finland. Until then, Yle's operations had been based only on a licence. At that point, the internet was not an important distribution platform for any media content. However, things changed rapidly as both the number of new web services and the number of households with internet connections started to grow. Yle introduced its first company website in 1995 and started to publish text-based online news a year later (Ala-Fossi, 2016).

The Finnish parliament had no objections to expanding Yle's remit into new platforms. On the contrary, in 2002 it defined the remit of the public service broadcaster as the production of 'full-service television and radio programming with supplementary and additional services available to everyone on equal terms' in all telecommunications networks, not just in broadcast networks.⁹ But the 2002 amendment of the Act says nothing about text, the simplest digital content format. Nevertheless, state aid was not mentioned at any stage in the legislative processes of the amendments to the Act on Yleisradio Oy. Therefore, the Finnish parliament never took a position on the state aid issue.

During the last two decades, the legal definition of Yle's remit has been revised three times. Besides 'versatile and comprehensive television and radio programming', the current text of the Act requires the company to also offer 'related additional and extra services for all citizens under equal conditions [...] in public communications networks nationally and regionally'.¹⁰ In this context, it is absolutely clear that the de facto purpose of the legislators has been to also include the provision of text-based digital online content into the official Yle remit, although this has never been separately mentioned in the law.

By 2004, it was clear that the Finnish newspaper industry would have rather kept Yle out of the internet completely, but it was already too late.

However, the publishers and the Finnish Media Federation were able to paralyse a political process for Yle funding reform in 2010 with an orchestrated campaign, which claimed the level of public funding for Yle to be too high (Ala-Fossi & Hujanen, 2010). This victory was temporary, because a year later the new parliament passed the bill on tax-based Yle funding. Finland had cut down direct public press subsidies since the 1990s and they were completely abandoned by 2008. Because of a sudden fiscal crisis of the state, indirect press subsidies (VAT reductions) too were decreased in 2012, while newspapers were already losing both subscribers and advertisers (Ala-Fossi, 2020). By 2015, the Finnish media industry had convinced the new government to establish a parliamentary committee to study Yle's remit and funding again (Karppinen & Ala-Fossi, 2017).

All the changes proposed by the committee in June 2017 were very modest. Only a few days later the Finnish Media Federation filed a complaint about Yle's web journalism to the EU Commission. The Federation claimed that any text-based Yle journalism online with no direct connection to public service radio or television content violates the EU state aid regulations. After more than two years of non-public correspondence with the Commission and two separate negotiations with the chairpersons of all parliamentary groups, the Ministry of Transport and Communications released a proposal for an amendment of the Act on Yleisradio Oy for public consultation in June 2020. The purpose of the proposed amendment was to fix the alleged problems with state aid regulations by setting new restrictions for Yle's online offering.¹¹

The challenges of the amendment

The public consultation of the proposal was exceptional in the Finnish context. First, the proposal was partly based on non-public correspondence with the Directorate-General for Competition. Second, in Finland it is customary to deal with matters concerning Yle in a parliamentary manner: that is, by consulting all parliamentary parties. This proposal was discussed only with the chairmen of the party groups. Third, a total of eighty-five organisations and private citizens decided to submit their statements. Also, we, the authors, participated with a statement addressing the problematic aspects of the proposal. Several authors also contributed to the public debates, and in early 2021 were consulted by both the Finnish Constitutional Law Committee and the

Transport and Communications Committee. Our critique and the proposed alternatives were as follows:

1. The proposal to restrict Yle's online offering of text-based content would decrease the amount of quality journalism freely available in Finnish. This would severely weaken the equality of access to information among the citizens and all people living in Finland, as commercial media will not produce any substitutive quality content available for free.
2. All decisions about the funding and remit of PSM remain unambiguously and without any controversy in the national competence of the EU member states. The role of the Commission is limited to 'checking for manifest errors', such as activities that do not serve the social, democratic, and cultural needs of society.
3. The division of text-based and audiovisual online content on which the complaint by the Finnish Media Federation was based has been technologically obsolete already at the time the complaint was written. In a digital environment, all content is bits, and text is just one (the simplest) format for consumption.
4. There is no clear research-based evidence about any harmful effects or financial losses of commercial news media caused by freely available Yle online news.
5. The proposal is also very open to interpretations and difficult to implement and monitor as a law, which means it will most likely not close this process but create a basis for new complaints.

Counterproposal and the adoption of the new legislation

The arguments listed above were also publicly supported by an official citizen's initiative,¹² launched on 15 February 2021 to counter the government proposal in the name of freedom of expression and democracy. Such an initiative bears significant weight: since 2012, an amendment to the Finnish constitution has made it possible for citizens to submit initiatives to parliament. An initiative proceeds to parliament if it has collected at least 50,000 statements of support within six months. The counterproposal of this citizens' initiative was drawn to a great extent from the assessments made by the present authors, in that Yle's text-based journalistic content should be defined by an amendment to the Act on Yle as a significant new service and a proper

evaluation process of its market impact should be executed, as stipulated in the Act on Yleisradio Oy.

By the third week of May 2021, the initiative had gathered over 33,000 signatories. Then it became public that Sanoma Media Finland, the largest Finnish commercial cross-media company with journalistic and educational arms, had asked the EU Commission to investigate the scope of Yle's streaming service Areena and suggested that Yle's e-learning content violated EU state aid rules. In Sanoma's newspaper, the biggest Finnish daily *Helsingin Sanomat*, the Dutch CEO of Sanoma noted that the company needs to know whether to invest in Finnish TV content in the future – hence the request to the Commission. The news caused a public uproar, including many subscribers cancelling *Helsingin Sanomat*, and the newspaper quickly responded with an op-ed that called the complaint outdated.¹³ The chain of events resulted in a flood of signatories to the citizens' initiative that by early June 2021 had already passed well over the 50,000 mark, reaching altogether 54,425 signatures.

In September 2021, the initiative was sent for consideration to the parliament at the same time as the proposed amendment prepared by the Ministry of Transport and Communications. However, in March 2022, the parliament first rejected the citizen's initiative and then adopted the amendment with the revisions made by the Transport and Communications Committee. The amendment entered into force at the beginning of August 2022.

The amendment means, in practice, that while Yle may continue providing text content online as part of its public service, these texts should, in most cases, be supported by video or audio material. However, there are several types of exceptions to the regulation, which allow publishing text content as such. Short texts produced by the Finnish News Agency (STT) and brief news produced in-house about breaking news are exempt, and news in Saami, Romani, and other minority languages can be published only in text. In addition, cultural and educational content and official announcements, which are part of Yle's legal remit, are also exempted.¹⁴

The decision of the Finnish parliament to restrict the online offering of Yle has subsequently aroused some international interest, not only among the European public service broadcasters but also among the publishers' associations. At least two Nordic sister organisations of the Finnish Media Federation, the Danish Media Association (Danske Medier) and Swedish Newspaper Publishers' Association (Svenska Tidningsutgivareföreningen) have already expressed their interest in filing similar types of complaints to the European

Commission (Sirén, 2021; Lunde, 2022; SVT, 2022). Although one of the main arguments of the Finnish Media Federation for restricting the online activities of Yle was economic, the CEO of the Federation, Jukka Holmberg, has so far been reluctant to provide any estimates on how the amendment will be reflected in the net result of commercial media (Haapalainen, 2022). The chairman of the Federation, Veli-Pekka Kangaskorpi, estimated earlier that restricting Yle could result in a 10–15% increase in the number of newspaper subscriptions (Kauppinen, 2020).

A year after the reform came into effect, Yle's online news offering has hardly changed at all, apart from the fact that more news stories include moving images and sound. New challenges to Yle's operations have not been initiated by commercial competitors but by political actors: namely, while the amendment was passed under a left-centrist government, the new right-wing government (2023–) has set up a parliamentary committee to further rethink, and possibly restrict, Yle's remit and funding.

The broader issue: Dynamics of power in PSM policymaking

In the case of Yle's text-based services, it is easy to note several concerns related to the public policy debate over the proposal, including the opaque origins of the proposal, the role of lobbying and media campaigns, and the lack of public debate over alternative policy solutions. Because of the lack of transparency, it is also difficult to judge whether the case implies a shift in the Commission's approach to PSM and what other factors may explain the outcome.

Aside from the legal perspective, the recurring and highly politicised debates over the definition and remit of PSM can also be viewed from the perspective of definitional and discursive power in media policy. From this perspective, the focus falls not only on regulatory solutions but also on the problem definitions and criteria used to assess the role of PSM in society. Discursive approaches to policy analysis highlight how policy problems not only reflect objective realities, but policy debates always also enact the 'problems' they purport to address (for example, Bacchi, 2009; Fischer, 2003). Different problem representations, in turn, reflect underlying policy pre-suppositions and political rationalities that shape policy considerations and guide policy objectives and alternatives.

In the PSM policy literature, it has been noted that campaigns against PSM organisations usually begin with a demand for a clear definition, which can then serve as a straitjacket that prevents the evolution of public service

organisations in the new media environment (see also Freedman, 2008, p. 156; Jakubowicz, 2004, p. 20). In this case, framing text-based PSM content as a market distortion problem implies a political rationality where public media is assigned a limited and potentially declining role as an exception to 'natural' market conditions. The discursive approaches to policy analysis often emphasise how the same policy problems can look different depending on the terminology and frameworks we use to define them. Although often presented as neutral and technocratic, the naturalisation of market frameworks (instead of other, more intangible concepts associated with cultural, social, or democratic values) for evaluating PSM clearly has implications on the type of arguments, actors, and arenas prioritised in the policy process (see, for example, Karppinen & Moe, 2014). In this sense, the case clearly illustrates a clash between neoliberal and broader social and cultural logics in media policy (for example, Freedman, 2008).

Also, framing the issue as a competition problem, instead of cultural or media policy, has the added consequence of reducing it to an administrative matter of following the EU rules where national policymakers have no alternatives. Such a frame also crowds out additional considerations, such as limits to freedom of expression nationally and limitations to the PSM mandate of universal reach, especially for those who greatly rely on Yle's free text-based news – whether due to economic concerns or to disabilities that necessitate news in textual form. These alternative arguments were repeatedly expressed in the public comments on the proposal to limit Yle's services by individuals and non-governmental advocacy organisations.

In this way, the framing of the issues produces political effects since it guides the relevant criteria and arguments that stakeholders can raise and limits the range of possible alternatives open to them. The perspective of definitional power also raises interesting questions about communication as an important power resource in media policymaking and regulation: several studies demonstrate that, for example, press coverage often tends to be critical of PSM and uncritical of issues, such as media concentration (for a review, see Ali & Puppis, 2018).

Conclusion

The case of Yle points to numerous challenges in the legal and policy processes regarding PSM. In light of the EU competition law and the Amsterdam Protocol, the Commission is likely going beyond its mandate to check for

'manifest errors' when engaging with state aid investigations in public service broadcasting. While it is clear that there are online services that would go beyond the scope of public service – like the manifest errors listed in the 2009 Communication, such as gambling, e-commerce, or the provision of advertising – it is similarly clear that providing news online could not be seen as a manifest error.

At the national level, the case points to the shift to a more opaque communication policy decision-making, observed by Neuvonen and Karppinen (2016) with earlier processes. The case reflects a broader danger of curbing the scope of PSM through the back door by employing inaccessible and technocratic processes instead of open public debate. It may also indicate a more fundamental transition in Finland from the so-called media welfare state to the competition state (Ala-Fossi, 2020).

The situation also highlights how an outdated sectoral approach to regulation still looms large and is used to define policy and to weaken Yle's role. Most media regulation is a national affair, even in EU member states, and public broadcasting regulation is especially so. National media regulation tends to be based on the technology of distribution (the medium), content, or function. Most media regulation is focused on the technology of distribution, regulating the printed newspaper, broadcasting, and the internet separately (Mac Síthigh, 2018). The Finnish amendment to the Act on Yleisradio Oy is a blast from the past because it is based on the traditional division of print, broadcasting, and the internet. The main problem is technological media convergence, which means that various forms of media are distributed via the same technological infrastructure. Therefore, the assumptions in the amended Act on Yleisradio Oy represent an outdated understanding of the media. From a regulatory point of view, the case of Yle is thus representative of problems that arise from regulating print and broadcasting differently. Similarly, it can be argued that the Amsterdam Protocol itself needs an update reflecting how public service content is distributed today.

The case of Yle is not unique in terms of the recent public uproar when attempts to limit its operations become significant in some way.¹⁵ But neither is the case an isolated one regarding challenges to PSM based on market distortion arguments. Yet, while complaints mount, media economic research has not found evidence of significant market distortion impacts (Sehl et al., 2020). Furthermore, recent economic arguments about PSM note that in the era of global platforms, not only do the organisations support freedom of expression and other democratic principles, but they boost innovation in the national media industry (Mazzucato et al., 2020) and at a macro level also

mitigate industry risk in national supplier and labour capacity and thus stimulate economic growth (Rodríguez-Castro et al., 2021).

Finally, the case highlights the special feature of *definitional power* in media policy. Media organisations are not only involved in media policy as stakeholders but also control the avenues of public communication on the issue. Still, the public uproar after the Sanoma complaint in 2021 and the resulting wide and popular support for the citizens' initiative defending public service provision online means that the definitional power has shifted, at least partly. The parliament had to discuss the counterproposal for the amendment and deal with it according to the rules. However, this case also proves that the right to be heard and express your opinion does not guarantee that you will always be listened to. Even if the amendment did not change much in practice regarding Yle's news output, the process itself gained attention and did not seem to take into account the views put forth by the citizens' initiative. Similarly, the more recent parliamentary process to question Yle's remit and funding seems not to take the majority of Finns' sentiments about PSM into account. Yle is continuously valued as Finland's most trusted news media in opinion polls, and according to a nineteen-country comparative study (Nielsen & Newman, 2023) Yle was not only the most trusted PSM organisation, but audiences in Finland valued the importance of PSM to society more highly than any other country.

A somewhat different policy discourse can be witnessed in the European Media Freedom Act (EMFA) which seeks to ensure the role of PSM as independent media outlets that support European democracy (European Commission, 2022a). Similarly, the Rule of Law Report of 2022 (European Commission, 2022b) included, for the first time, a section on PSM that states the importance of their existence as independent parts of the media sector. It remains to be seen if and how the EU, the Directorate-General for Competition, and national policymakers will respond differently to economically and technologically outdated complaints in the future. Also, the Think Tank for Tech and Democracy of the Nordic Council of Ministers has noted the central role of PSM in the national media system and urges the Nordics to allow and support PSM innovations in digital realms as a counterforce to global platforms (Nordic Council, 2023).

To be fair, the amendment has had little impact on Yle's journalism in practice, and its news site is still among the top online news sources in the country (for example, Reunanen, 2023). The effect has more to do with how national policies position the role of PSM and the importance of PSM journalism in Finnish society. This is replicated in the work of the parliamentary

committee (ongoing in 2024) to assess Yle's remit and funding,¹⁶ and it is expected that the purpose is to limit Yle's functions further.

A significant focus in the debates will most likely be on Yle's journalism, given the dissatisfaction of the commercial competitors in the perceived competitive advantage in the very real economically challenging situation. In addition, political pressure against Yle has intensified: at the beginning of 2024, the leader of the populist right-wing Finns Party – who is also the Speaker of the parliament – demanded that Yle's funding be cut by 25%, partly because of its 'left-leaning, biased contents' (Waris, 2024). This kind of populist attack against PSM is by no means unique to Finland (Sehl et al., 2022) but adds to the discursive struggles over national PSM policies, all the while the EU seeks to support the role of PSM through EMFA (for example, European Commission, 2023). Indeed, in these times of European 'polycrisis' (for example, Zeitlin et al., 2019), including 'infodemic' (WHO, n.d.) and 'information warfare' made powerful with the rise of artificial intelligence and other 'computational propaganda' (for example, Woolley & Howard, 2018), the attempts and actions to limit digital public service journalism seem ill-advised, especially in countries with a strong and trusted PSM, like Finland.

Notes

1. Treaty of Amsterdam amending the Treaty on European Union, the Treaties establishing the European Communities and certain related acts; Protocols annexed to the Treaty establishing the European Community; Protocol on the system of public broadcasting in the Member States, OJ 97/C 340/01, 10 November 1997, p. 109.
2. See Judgments of 19 May 1993, *Corbeau*, C-320/91, EU:C:1993:198, paragraphs 14 and 16; of 23 October 1997, *Commission v France*, C-159/94, EU:C:1997:501, paragraphs 59, 95 and 96; and of 15 November 2007, *International Mail Spain*, C-162/06, EU:C:2007:681, paragraphs 34 and 35.
3. Décret no. 2009-1263 du 19 octobre 2009 portant approbation des statuts de la société nationale de programme France Télévisions. <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000021180238/2020-09-28/>
4. Décret no. 2017-1043 du 9 mai 2017 portant approbation des statuts de la société nationale de programme Radio France. <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000034679087>
5. Contratto Nazionale di servizio tra il ministero dello sviluppo economico e la RAI-Radiotelevisione Italiana https://www.rai.it/dl/doc/1607970429668_Contratto%20di%20servizio%202018-2022.pdf

6. *Rundfunkstaatsvertrag*, § 11d (7). https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/RStV_22_nichtamtliche_Fassung_medienanstalten_final_web.pdf
7. *ORF-Gesetz*, § 4e (2a). <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10000785>
8. Act on Yleisradio Oy (1380/1993), 7§, <https://finlex.fi/fi/laki/alkup/1993/19931380> (original text, author's translation from Finnish).
9. Amendment of Act on Yleisradio Oy (492/2002), 7§, <https://finlex.fi/fi/laki/alkup/2002/20020492>
10. Act on Yleisradio Oy, (1380/1993), 7§ <https://www.finlex.fi/fi/laki/kaannokset/1993/en19931380.pdf> (amended text, official translation from Finnish).
11. Proposal for an Amendment of Act on Yleisradio Oy (HE 250/2020 vp) https://www.eduskunta.fi/FI/vaski/HallituksenEsitys/Sivut/HE_250+2020.aspx
12. *Tieto on meidän* [Information belongs to us], see <https://www.kansalaisaloite.fi/fi/aloite/8023>
13. See 'Sanoman Yle-kantelu jäi ajastaan jälkeen', <https://www.hs.fi/paakirjoitukset/art-2000008008985.html>
14. The final text of the amendment (159/2022) <https://www.finlex.fi/fi/laki/alkup/2022/20220159> and the Act on Yleisradio Oy in its present form <https://www.finlex.fi/fi/laki/ajantasa/1993/19931380>
15. For example, on the case of No Billag in Switzerland, Schweitzer (2020).
16. 'Parliamentary working group to assess YLE's duties and funding'. Finnish government. https://valtioneuvosto.fi/sv/-/1410829/parlamentarisk-arbetsgrupp-ska-bedoma-rundradions-uppgift-och-finansiering?languageId=en_US

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