



4.11. FI - Finland¹⁷⁰

4.11.1. Key findings

- Reasonable accommodation measure – costs of implementing subtitling and spoken subtitling will not exceed 1% of the operators' prior financial year for private broadcasters.
- Focus is on subtitling and spoken subtitling, which must be applied to 100% of the public service broadcasters' general programming and 75% of “public-interest television programming”.
- Other types of accessibility measures are not mandated or provided for in the guidance document.
- There are no separate accessibility obligations for live broadcasts, however only live music and sports programmes are excluded when calculating the quotas. Regional news programmes do not need to be subtitled as live broadcasts (but made accessible for rerun).
- There is no distinction made under Finnish law for linear and non-linear on-demand services in their accessibility obligations.
- The national regulatory media authority, Traficom, has reprimanded a private audiovisual media service provider, Sanoma Media Finland Ltd., for failure to meet quality requirements for the subtitling provided on the television channel Nelonen. However, the service provider has since improved the quality of subtitling and now meets the requirements.

4.11.2. Legal framework: primary and secondary legislation

National legislation	Summary of the measures
Article 7 (1) AVMSD	
Act on Electronic Communications Services, section 211 (1207/2020) (primary legislation) – (<i>Laki sähköisen viestinnän</i>)	Finnish or Swedish television programmes and on-demand programme service programming shall be accompanied by subtitling and other programmes by audio description or a service where the text of the subtitled programme is converted to voice.

¹⁷⁰ The summary on Finland incorporates feedback received from Eliisa Reenpää, special adviser at the Finnish Transport and Communications Agency (Traficom) during the checking round with the national regulatory authorities.



<p><i>palveluista (917/2014)</i> ¹⁷¹</p> <p>Government decree on audiovisual services (<i>Valtioneuvoston asetusta audiovisuaalisista palveluista</i>) ¹⁷² (1245/2014)</p>	<p>Public service broadcaster Yleisradio Oy (Finnish Broadcasting Company) must provide subtitling and spoken subtitling for linear and on-demand programming. "Public interest television channels/channels serving several different audience groups" broadcast under a national programming licence must also provide subtitling and audio subtitling services to linear and on-demand programming. The services need not be added to music presentations or sports programmes provided as live broadcasts. The implementation of the subtitling service shall be of high quality so that the subtitling is sufficiently clear and comprehensible for the user.</p> <p>The costs of implementing audio subtitling and subtitling incurred by an operator other than a public service television broadcaster shall not exceed 1% of the operator's prior financial period.</p> <p>The share of audio subtitling and subtitling services shall be 75% of the public-interest television programming and 100% of public service programming. The share of audio subtitling and subtitling services shall be 30% of on-demand programme services referred to in subsection 2. The decree provides information about the technical implementation of subtitling and spoken subtitling, the costs of implementation per programming hour and the provision on what is deemed "programming serving several different audience groups".</p>
Article 7 (2) AVMSD	
Act on Electronic Communications Services, section 211	Providers of audiovisual content services must report to the Transport and Communications Agency (Traficom).
Article 7 (3) AVMSD	
Act on Electronic Communications Services, section 211.2	Providers of audiovisual content services must prepare action plans for making their services continuously and gradually more accessible and submit to Traficom.
Article 7 (4) AVMSD	
Act on Electronic Communications Services, section 304	Traficom must act as a single contact point in questions relating to accessibility of audiovisual content.
Article 7 (5) AVMSD	
Act on Electronic Communications Services, section 279	Information of public interest to be relayed to the public without delay. No specific accessibility measures included.

¹⁷¹ <https://finlex.fi/en/laki/kaannokset/2014/20140917>

¹⁷² <https://www.finlex.fi/fi/laki/ajantasa/2014/20141245>



<p>Act on Yleisradio Oy, section 7 subsection 2 paragraph 7 – (<i>Laki Yleisradio Oy:sta (1380/1993)</i>)¹⁷³</p>	
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4.11.3. Overview of national rules

Types of accessibility measures	Brief overview of existing rules
<p>Accessibility measures (hearing impairments)</p>	<p>Subtitling:</p> <p>Public service programming – subtitling shall be provided in 100% of programmes that are broadcast in Finnish or Swedish (excluding live music/sports).</p> <p>Public interest and “[t]elevision programming broadcast under a national programming licence and serving several different audience groups” – subtitling shall be provided in 75% of programmes that are broadcast in Finnish or Swedish (excluding live music/sports).</p> <p>Video-on-demand (VOD) (of the same channels that have an obligation in linear television): subtitling shall be provided in 30% of programmes that are in Finnish or Swedish (excluding live music/sports).</p> <p>Sign language: no specified quotas.</p>
<p>Accessibility measures (visual impairments)</p>	<p>Audio description: no specified quotas.</p> <p>Audio subtitles:</p> <p>Public service programming – audio subtitling shall be provided in 100% of programmes that are broadcast in a foreign language (excluding live music/sports).</p> <p>Public interest and “[t]elevision programming broadcast under a national programming licence and serving several different audience groups” – audio subtitling shall be provided in 75% of programmes that are broadcast in a foreign language (excluding live music/sports).</p> <p>VOD (of the same channels that have an obligation in linear television): audio subtitling shall be provided in 30% of programmes in a foreign language (excluding live music/sports).</p>
<p>Accessibility measures developed by self- or co-regulatory process</p>	<p>Yes, action plans developed and submitted to the Ministry of Transport and Communications.</p>

¹⁷³ <https://finlex.fi/fi/laki/ajantasa/1993/19931380#L3P7>



Reporting to the NRA – frequency	Yes, not specified.
Designated point of contact for information and complaint	Transport and Communications Agency – a contact form provided on Traficom website ¹⁷⁴

4.11.4. Law in practice: selected examples¹⁷⁵

4.11.4.1. Public service broadcaster: Yleisradio Oy¹⁷⁶

According to Traficom’s guidance combined with the Act on Electronic Communications Services, Yleisradio Oy’s (public service broadcaster) Finnish or Swedish language television programmes and on-demand programming must be accompanied by subtitling, and programmes in other languages by audio subtitling.

4.11.4.2. Private broadcasters: MTV Oy and Sanoma Media Finland Oy

MTV Oy and Sanoma Media Finland Oy shall provide subtitling and audio subtitling in 75% of the programming on their linear TV channels MTV3 and Nelonen respectively. They shall also provide these services in their VOD services, where the quota is 30%.

Sanoma Media Finland Oy (private broadcaster) provides subtitling for some of its content on the channel Nelonen, but that subtitling used to have fundamental problems with reading and comprehensibility as well as subtitle lag. Based on these flaws, Traficom had initiated sanctions proceedings against Sanoma Media Finland Oy for violating the Act on Electronic Communications Services requirement that subtitling shall be of high quality so that it is sufficiently clear and comprehensible.¹⁷⁷ However, in August 2023 the situation improved significantly as Sanoma Media Finland Oy has taken appropriate measures to improve the quality of subtitling on Nelonen.¹⁷⁸

4.11.4.3. VOD

According to Traficom’s guidance combined with the Act on Electronic Communications Services, Sanoma Media Finland Oy’s VOD service Ruutu should follow the same rules as presented above. During the course of the year 2023 Sanoma Media Finland Oy has made a subtitling service available on its VOD service Ruutu as well.

¹⁷⁴ See <https://www.traficom.fi/en/contact-form-audio-subtitling-and-subtitling-services-tv-programmes-and-video-demand-services>

¹⁷⁵ Examples as provided by the national expert.

¹⁷⁶ This section showcases Traficom’s guidance, available at: <https://www.traficom.fi/en/audio-subtitling-and-subtitling-services-people-visual-or-auditory-impairments>

¹⁷⁷ <https://www.traficom.fi/en/news/obligation-address-insufficient-quality-subtitling-services>

¹⁷⁸ <https://www.traficom.fi/fi/ajankohtaista/mediapalvelujen-esteettomyys-osa-yhdenvertaisuutta-nyt-myos-nelosen-tekstitykset>