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COMMISSION STAFF WORKING DOCUMENT

2025 Rule of Law Report Country Chapter on the rule of law situation in Finland

Accompanying the document

**Communication from the Commission to the European Parliament, the Council, the
European Economic and Social Committee and the Committee of the Regions**

2025 Rule of Law Report The rule of law situation in the European Union

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ABSTRACT

The level of perceived judicial independence in Finland continues to be very high. The working group aiming to strengthen the independence of the justice system proceeded with their work, and limited steps were taken on the issue of the appointment of lay judges. The reliance on the appointment of non-permanent judges is a concern for stakeholders. The Government took steps to strengthen victim protection in the context of alternative dispute resolution in criminal cases. The project of digitalising case management for general courts was concluded in 2024, with a further development of the system ongoing. The level of legal aid fees for private legal practitioners was increased. While the justice system functions efficiently overall, the latest figures indicate a slight increase in the length of proceedings in certain areas.

The perception among experts, citizens and business executives is that Finland is one of the least corrupt countries in the world. The new anti-corruption Action Plan for 2024–2027 was approved in 2025. Cooperation between the police and prosecution continues smoothly, with adequate resources allowing them to efficiently perform their tasks. The government is planning to propose legislation to criminalise trading in influence and revise the foreign bribery offence once the proposed EU Directive against corruption is agreed. Further initiatives are taking place to potentially further strengthen the integrity framework for Ministers with a Code of Conduct. The Transparency Register Act is reported to function well. A legislative proposal on limiting ‘revolving doors’ for Ministers has been submitted to Parliament and legislative amendments on developing transparency in political party financing legislation entered into force. New initiatives are aimed at tackling corruption risks in the public procurement area, which remains a high-risk area for corruption, just as urban and land use planning.

The national media regulatory authorities are undergoing structural changes while their independence remains stable. The updates of ethical rules for the press have started to apply and the self-regulatory Finnish Council for Mass Media continues to deal with a high number of complaints about journalistic ethics. The government has proposed new legislation to further strengthen the independence of the public service media while also reducing its funding. Some steps have been made to strengthen the right of access to information. The framework for the protection of journalists has remained stable.

The law-making process is overall inclusive, though stakeholders highlight areas for improvement, such as ensuring that the minimum length of consultation periods is observed in practice. The civil society framework remains open, although some stakeholders continue to report a change in the narrative concerning the role of civil society actors.

RECOMMENDATIONS

Overall, concerning the recommendations in the 2024 Rule of Law Report, Finland has (made):

- Fully implemented the recommendation to continue the work of the working group ‘Rule of Law Guarantees and Development of the Judicial System’ with a view to strengthen the independence of the justice system and increase the quality of legal protection.
- Limited progress on reforming the appointment of lay judges, taking into account European standards on judicial independence.
- Limited progress on adopting legislation on trading in influence and proposing a revision on the criminal offence of foreign bribery.
- Limited progress on strengthening the integrity and accountability framework applicable to ministers and other persons entrusted with top executive functions by adopting a code of conduct for them.
- Some further progress on further advancing with the reform of the Act on the Openness of Government Activities to ensure effective and wider access to documents taking into account the European standards on access to official documents.

On this basis, and considering other developments that took place in the period of reference, it is recommended to Finland to:

- Advance the reform of the appointment of lay judges, taking into account European standards on judicial independence.
- Take forward the revision of the criminal offence of foreign bribery.
- Continue efforts to strengthen the integrity and accountability framework applicable to ministers and other persons entrusted with top executive functions by adopting a code of conduct for them.
- Advance with the reform of the Act on the Openness of Government Activities to ensure effective access to documents taking into account the European standards on access to official documents.

I. JUSTICE SYSTEM¹

Independence

The level of perceived judicial independence in Finland continues to be very high among both the general public and companies. Overall, 89% of the general population and 90% of companies perceived the level of independence of courts and judges to be ‘fairly or very good’ in 2025². The perceived judicial independence among the general public has increased in comparison with 2024 (83%), as well as with 2021 (83%). The perceived judicial independence among companies has slightly decreased in comparison with 2024 (91%) and has increased in comparison with 2021 (86%).

The recommendation to continue the work of the working group aiming to strengthen the independence of the justice system was fully implemented³. The working group ‘Rule of Law Guarantees and Development of the Judicial System’⁴ continues with its project to strengthen the independence of the judiciary and promote high-quality, user-oriented legal protection⁵. The comments received on the preliminary proposals, presented by the working group in 2024, will be further examined in 2025 and 2026⁶. In order to properly assess the necessary constitutional and other legislative changes required to strengthen the independence of courts and judges, a dedicated ‘Independence working group’ was established⁷. The working group is focused on identifying possible constitutional and/or legislative amendments, in particular with regard to the number of judges in the highest courts, the appointment process for judges, judges’ right to remain in office, and judicial misconduct. Stakeholders welcome the objectives of the working group and emphasise notably the importance of addressing the number of judges in the highest courts, and the appointment process for permanent and fixed-term judges, as well as for lay judges. They also note that instead of preparing a legislative draft, as originally envisaged, the working group will issue a memorandum, which may delay the process of adoption of the proposals⁸. Since the working group continues with its project and is envisaged to issue a memorandum proposing legislative changes to strengthen the independence of the justice system, this recommendation has been fully implemented.

¹ An overview of the institutional framework for all four pillars can be found [here](#).

² Figures 50 and 52, 2025 EU Justice Scoreboard and Figures 49 and 51, 2023 EU Justice Scoreboard. The level of perceived judicial independence is categorised as follows: very low (below 30% of respondents perceive judicial independence as fairly good and very good); low (between 30-39%), average (between 40-59%), high (between 60-75%), very high (above 75%).

³ The 2024 Rule of Law Report recommended to Finland to “[c]ontinue the work of the working group ‘Rule of Law Guarantees and Development of the Judicial System’ with a view to strengthen the independence of the justice system and increase the quality of legal protection.”

⁴ The working group consists of six subgroups, with a working plan for the years 2023–2027.

⁵ 2024 Rule of Law Report, Finland, p. 4.

⁶ Finnish Government (2025), written input, p. 7. The conclusions of the whole project are expected to be presented in 2027.

⁷ The mandate of this working group ‘Constitutional guarantees for the independence of the judiciary’ runs until the end of 2026.

⁸ Country visit Finland, Supreme Administrative Court, Supreme Court, Chancellor of Justice, Finnish Bar Association.

Limited progress has been made to reform the appointment of lay judges⁹. Lay judges, who participate in certain non-criminal cases and in serious criminal cases where the maximum penalty exceeds two years of imprisonment, are currently appointed by political parties, with the number of appointments allocated according to the results of the local elections. The Ministry of Justice issued an assessment memorandum in April 2025, comments were received on the assessment memorandum and a summary of opinions will be prepared later in 2025¹⁰. The matter is also under assessment in the working group on ‘Rule of Law Guarantees and Development of the Judicial System’. While there is broad consensus among stakeholders on the need to revise the selection procedure for lay judges¹¹ as the involvement of political parties raises independence and impartiality concerns, some have called for the abolishment of the institute of lay judges altogether¹². In light of the current situation, limited progress has been made on the recommendation.

The reliance on the appointment of non-permanent judges is a concern for stakeholders due to perceived challenges for judicial independence. The current system of selection of judges allows for appointing judges for a fixed term of service, which allows for a faster selection and appointment procedure as opposed to permanent judges¹³. The possible extension of the term of a non-permanent judge depends on the assessment of his or her performance, effectiveness and social skills, carried out by the supervising head of department or President of the court¹⁴. In 2024, 16 % of the total number of judges in Finland held a non-permanent position, while in the District Court Helsinki they constitute approximately a third of the total number of judges¹⁵. Non-permanent judges may also be appointed to the highest courts. Stakeholders perceive potential challenges for judicial independence in this regard, also due to the interconnectedness of the design of the appointments and the court’s budget¹⁶. They noted that a more comprehensive reform of the procedure of selection of judges would be instrumental in achieving a better balance between permanent and non-permanent posts¹⁷.

Quality

The Government took steps to strengthen victim protection in the context of alternative dispute resolution in criminal cases. Mediation between the suspect and the victim is possible when certain conditions are met¹⁸, aiming to reconcile the two sides while alleviating the workload of courts and law enforcement authorities. Mediation is voluntary, free of charge, conducted by local mediation offices and subject to the consent of both parties¹⁹. Mediation is available for all types of crimes, including serious offences

⁹ The 2024 Rule of Law Report recommended to Finland to “[r]eform the appointment of lay judges, taking into account European standards on judicial independence.”

¹⁰ Country visit Finland, Finnish Government.

¹¹ Country visit Finland, National Courts Administration.

¹² Country visit Finland, Parliamentary Ombudsman, Association of Judges.

¹³ Court’s Act.

¹⁴ Country visit Finland, Association of Judges.

¹⁵ National Administration of Courts, additional written input. Country visit Finland, Association of Judges.

¹⁶ Country visit Finland, Association of Judges, Supreme Administrative Court.

¹⁷ Country visit Finland, National Administration of Courts, Association of Judges.

¹⁸ This matter is stipulated in the Act on the Mediation of Criminal Matters and Certain Civil Matters.

¹⁹ Mediation may be initiated by the victim, the suspect, but also *ex officio* by the police officer or public prosecutor, with a wide margin for discretion. The initiation of mediation may lead to mitigating punishment, limiting pre-trial investigation, discontinuing prosecution and is considered as a factor in

and, in some cases, crimes against minors. Despite legal safeguards in place, stakeholders raised concerns that the use of mediation may be promoted to avoid fully-fledged criminal investigations, and that mediation is not suitable for assault or serious crimes against life and health²⁰. In response, an amendment excluding cases of domestic violence from mediation entered into force in January 2025, which was welcomed by the stakeholders²¹.

The project of digitalising case management for general courts was concluded in 2024, with a further development of the system ongoing. The project aimed at digitalising case management in general courts and prosecutors' offices ('AIPA'), was concluded in 2024, marking the end of an intensive project phase. In the final stage of implementation, the system was introduced also for criminal cases at district courts and rolled out to appellate courts as well²². A transitional period remains for prosecutors, who currently operate two parallel systems, with full integration expected by late 2025²³. While stakeholders welcome the progress achieved, they also note that there is room for further improvement²⁴. There has been no development on the envisaged electronic portal for attorneys and other legal representatives which is considered an important tool to increase transparency, equality of arms and overall efficiency in court proceedings²⁵.

The level of legal aid fees for private legal practitioners was increased. In January 2025, the Ministry of Justice increased the level of legal aid fees for private legal practitioners, which had remained unchanged since 2014²⁶. Following the reorganisation of the legal aid and public guardianship districts carried out by the Ministry of Justice, a National Legal Services Authority became operational on 1 January 2025²⁷. Stakeholders generally welcome this development. As regards the level of court fees, some

sentencing. Parties to the mediation may reach an agreement, or the process may be interrupted in favour of going to court, or there might be no agreement.

²⁰ Deputy Chancellor of Justice(2020), p. 143.

²¹ Country visit Finland, National Prosecution Authority, Supreme Court, Parliamentary Ombudsman.

²² Finnish Government (2025), written input, p. 11.

²³ Finnish Government (2025), written input, p. 11. Country visit Finland, National Prosecution Authority.

²⁴ Country visit Finland, Supreme Court, National Courts Administration, National Prosecution Authority. Supreme Administrative Court noted positive experience with the system for administrative courts ('HAIPA'), with some room for improvement.

²⁵ Council of Bars and Law Societies of Europe (2025), written input, p. 2. Country visit Finland, Association of Judges.

²⁶ The Supreme Court concluded in 2024 (KKO:2024:71) that the previous amount applicable since 2014 was no longer reasonable and disapplied the Government decree setting the fee which was in force at the time. However, the Supreme Administrative Court issued a diverging ruling (KHO:2024:129) and continued to apply the said decree. Subsequently, the Ministry of Justice amended the decree increasing the hourly fee to 120 euro. This new amount was considered to be insufficient by some stakeholders. Council of Bars and Law Societies of Europe (2025), written input, p. 2. The new amount was below the threshold set by the Supreme Court ruling, which temporarily contributed to a continued lack of uniform application. Finnish Bar Association (2025), written input, p. 2. Country visit Finland, Finnish Bar Association, Supreme Court, Supreme Administrative Court. However, in April 2025, the Supreme Court found the new fee compatible with the Legal Aid Act (KKO:2025:38), removing the need for further legislative amendments. Finnish Government (2025), written input, p. 9.

stakeholders pointed out that in intellectual property matters at the Market Court²⁸, the levels amount to EUR 2 440, which could affect access to justice²⁹.

Efficiency

While the justice system functions efficiently overall, the latest figures indicate a slight increase in the length of proceedings in certain areas. The disposition time in civil and commercial cases at first instance saw an increase from 327 in 2022 to 349 days in 2023. For administrative cases at first instance, the disposition time was lower and decreased from 281 in 2022 to 263 in 2023. Some stakeholders continue to see room for improvement as regards the length of proceedings³⁰, including business stakeholders with respect to commercial matters³¹. The Supreme Court has now the possibility, since April 2025, to issue preliminary rulings on cases referred to it by lower courts, with the aim to steer legal questions of a precedential nature more effectively³². This step is generally welcomed by stakeholders, who view this as a way to unify jurisprudence across the country. They also note that while this institute limits the parties' right to appeal, consent of the parties is required for such referral³³. In 2024, the Ministry of Justice closed down three venues of district courts, and the closing of three more detached court premises is under consideration, with the aim to increase the efficiency of the judicial system³⁴. Stakeholders view these changes as generally acceptable but note the need to maintain a sufficient level of access to courts³⁵.

II. ANTI-CORRUPTION FRAMEWORK

The perception among experts, citizens and business executives is that Finland is one of the least corrupt countries in the world. In the 2024 Corruption Perceptions Index by Transparency International, Finland scores 88/100 and ranks 2nd in the European Union and 2nd globally³⁶. This perception has been relatively stable over the past five years³⁷. The 2025 Special Eurobarometer on Corruption shows that 21% of respondents consider corruption widespread in their country (EU average 69%) and 9% of respondents feel personally affected by corruption in their daily lives (EU average 30%). As regards businesses, 28% of companies consider that corruption is widespread (EU average 63%) and 18% consider that corruption is a problem when doing business (EU average 35%). Furthermore, 49% of respondents find that there are enough successful prosecutions to deter people from corrupt practices (EU average 36%), while

²⁸ A specialised court with exclusive jurisdiction over certain commercial matters, specifically procurement, competition and supervision matters, market law matters and intellectual property rights matters. Finnish Government (2025), written input, p. 12.

²⁹ Finnish Chamber of Commerce (2025), written input. Country visit Finland, Supreme Administrative Court.

³⁰ Country visit Finland, Human Rights Centre.

³¹ Finnish Chamber of Commerce, Confederation of Finnish Industries (2025), additional written input.

³² Finnish Government (2025), written input, p. 9.

³³ Once the lower courts refer the preliminary question to the Supreme Court, the lower courts are bound by its decision.

³⁴ Finnish Government (2025), written input, p. 12.

³⁵ Country visit Finland, Finnish Bar Association, Association of Judges.

³⁶ The level of perceived corruption is categorised as follows: low (the perception among experts and business executives of public sector corruption scores above 79); relatively low (scores between 79-60), relatively high (scores between 59-50), high (scores below 50).

³⁷ In 2020 the score was 85, while, in 2024, the score is 88. The score significantly increases/decreases when it changes more than five points; improves/deteriorates (changes between 4-5 points); has been relatively stable (changes from 1-3 points) in the last five years.

62% of companies believe that people and businesses caught for bribing a senior official are appropriately punished (EU average 33%)³⁸.

The new anti-corruption Action Plan for 2024–2027 was approved in 2025. The final implementation report of the National Anti-Corruption Strategy and 2021–2023 Action Plan, expected in July 2024, were postponed to 2025. The new 2024–2027 Action Plan of the national anti-corruption strategy was approved in June 2025. It is based on the already established anti-corruption strategy, with a focus on the regional and local levels, as well as on the recommendations of international bodies and risk areas (i.e. public procurement)³⁹. Civil society has been involved in the design of this new Action Plan⁴⁰. The 2024 Anti-corruption policy of the police, recommended by GRECO⁴¹, has been supplemented by an implementation plan in the summer of 2024 and is reported to be well implemented. It includes trainings in every unit of the police as well as incorporating an ethical code which has been valid since 2018⁴².

Cooperation between the police and prosecution continues smoothly, with adequate resources allowing them to efficiently perform their tasks. The police considers its current level of resources and expertise to deal with anti-corruption cases as adequate. In corruption investigations, the police is able to engage investigators allocated to demanding financial crime investigations, when necessary. The police benefits from specific trainings for the National Bureau of Investigation, local police stations and the Financial Intelligence Unit⁴³. The Anti-Corruption Cooperation Network, gathering ministries, prosecution and police services, is reported to provide fruitful exchanges regarding the fight against corruption⁴⁴. The cooperation with the EPPO is reported to be efficient⁴⁵.

There has been limited progress on the recommendation to adopt legislation to criminalise trading in influence and revise the foreign bribery offence⁴⁶. The Finnish Government is planning to launch the legislative process once the forthcoming EU Directive on combating corruption is adopted and enters into force. As already reported in previous years, the Ministry of Justice prepared a draft proposal on criminalising trading in influence in 2022, which would now be considered as a part of the reform

³⁸ Data from special Eurobarometer 561 (2025). Flash Eurobarometer 557 (2025).

³⁹ Finnish Government (2025), Government Resolution on the National Anti-Corruption Strategy and Action Plan 2025-2027. Country visit Finland, Ministry of Justice. Finnish Government (2025), written input, p. 15. 2024 Rule of Law Report, Finland, p. 11.

⁴⁰ Country visit Finland, Ministry of Justice and Transparency International Finland.

⁴¹ GRECO (2023), recommendation vii, p. 9.

⁴² Finnish Government (2025), written input, p. 16. Country visit Finland, National Police Board. Police of Finland (2024), Police Anticorruption Policy. This Anticorruption Policy includes 1) Maintaining high trust in the police, 2) The police has zero tolerance to corruption, 3) We are aware of, recognise and manage corruption risks, 4) We ensure the detection and reporting of misconducts, and 5) Faced with any corruptive features, we take immediate action.

⁴³ Country visit Finland, National Prosecution Authority, NBI and National Police Board. Within the NBI, one national coordinator is responsible for the fight against corruption, and two detectives are charged with anti-corruption tasks.

⁴⁴ Country visit Finland, National Police Board.

⁴⁵ Prosecution services received 10 cases of corruption cases from the police in 2024, compared to 9 in 2023. Country visit Finland, National Prosecution Authority. No EPPO corruption cases have been reported in Finland in 2024. EPPO (2024), p. 29.

⁴⁶ The 2024 Rule of Law Report recommended to Finland to “[a]dopt legislation on trading in influence and propose a revision on the criminal offence of foreign bribery.”

expected with the future EU directive⁴⁷. This would also cover reforms to laws on bribery⁴⁸. The study “Development Needs for Legislation on Bribery Offences”, published by the Ministry of Justice in May 2024, proposes alternative models for simplifying the essential elements, criminalising trading in influence, improving the efficiency of imposing confiscation in bribery of a foreign party, and clarifying the definition of a foreign official⁴⁹. The revision of the foreign bribery offence has also been recommended in previous reports, and by the OECD. In 2022, the Government published an independent study covering foreign bribery⁵⁰, and the new independent study published in 2024 analysed possible needs for amendments⁵¹. The police reports that the Criminal Code’s threshold for sufficient evidence makes it sometimes difficult to bring some cases forward, especially related to bribery involving international elements and the trading of influence⁵². Overall, as the government is planning to take steps to criminalise trading in influence and revise the provisions on foreign bribery once new EU legislation enters into force, limited progress has been made on this recommendation of the 2024 Rule of Law Report.

There has been limited progress on the recommendation concerning the integrity framework for Ministers and top executive functions, with Ministers still not covered by the Code of Conduct⁵³. A Code of Conduct for civil servants and top executive functions is in place since 2021, which however does not apply to Ministers⁵⁴. The Minister’s Handbook, updated in 2023, includes principles of good governance⁵⁵. A dedicated Code of Conduct for Ministers would address other sensitive integrity related areas, as also recommended by GRECO⁵⁶. The new Action Plan of the National Anti-Corruption Strategy 2024-2027 adopted by the Government contains a measure whereby a document outlining the key guidelines for ministers concerning the prevention of corruption and the promotion of integrity will be compiled into a single document.⁵⁷ Overall, as reflections are still ongoing, limited progress has been made on this recommendation of the 2024 Rule of Law Report⁵⁸.

The Transparency Register Act, establishing an electronic transparency register and upgrading the lobbying framework, is reported to function well. Overall, the

⁴⁷ 2024 Rule of Law Report, Finland, pp. 11-12. Proposal for a Directive of the European Parliament and of the Council on combating corruption, COM(2023) 234 final. The Proposal is currently under discussion.

⁴⁸ Finnish Government (2025), written input, pp. 14-15.

⁴⁹ Finnish Government (2025), written input, p. 6; p. 14.

⁵⁰ Government Office (2022), Corruption in international business, Current state of regulation, application practice and training and needs for change. The study shows that there is a need to develop the supply of education, trainings as well as legislation and application practice.

⁵¹ Country visit Finland, Ministry of Justice. Finnish Government (2025), written input, pp. 14-15. 2024 Rule of Law Report, p. 12.

⁵² National Police Board (2025), additional written input, p. 2.

⁵³ 2024 Rule of Law Report, Finland, pp. 13-14. The 2024 Rule of Law report recommended to Finland to “[s]trengthen the integrity and accountability framework applicable to ministers and other persons entrusted with top executive functions by adopting a code of conduct for them.”

⁵⁴ It covers senior officials in central government, who are subject to financial disclosure requirements.

⁵⁵ It includes legal and political responsibility of ministers, declaration of private interests and rules on receiving hospitality, benefits and gifts.

⁵⁶ GRECO (2023), recommendation i, paras. 17, 96. 2024 Rule of Law Report, pp. 13-14. Investigations of corruption by members of the Government follow a different procedure than normal corruption investigation. The Minister’s Handbook is generic, and no enforcement mechanism is in place. GRECO (2023), recommendation iv and v, paras. 28-41.

⁵⁷ Finnish government (2025), Government Resolution on the National Anti-Corruption Strategy and Action Plan 2025-2027, p.20. Country visit Finland, Ministry of Justice.

⁵⁸ Country visit Finland, National Prosecution Authority.

framework for lobbying is composed of several acts and administrative guidelines. The 2024 Transparency Registry Act lays down the obligation to register influencing activities and related professional advice by legal persons and private traders⁵⁹. Lobbying activities targeted at Parliament and ministries must be reported to the Transparency Register, managed by the National Audit Office. In 2024, the Ministry of Justice organised targeted awareness raising and training campaigns⁶⁰, and recommendations on good practices on lobbying in connection with the Register are being implemented. In December 2024, the National Audit Office issued a decision expanding the reporting requirement to financial aspects of lobbying activities, effective since the beginning of the year⁶¹. While the Government will evaluate the Transparency Register towards the end of the Government term (2026–2027), it has not so far identified any particular challenges regarding its implementation⁶². For its part, civil society considers the Register to be an important tool for increasing transparency of administration, while advocating for an expansion of the register to local levels as well as for more dissuasive sanctions⁶³.

A government legislative proposal on limiting ‘revolving doors’ for Ministers has been submitted to Parliament in September 2024. A new legislative initiative has been included in the 2024 Government legislative plan and submitted to Parliament in September 2024⁶⁴. Under this new initiative, the right of both the Prime Minister and other ministers to move to another position after their term could be restricted for a maximum period of up to 12 months. These measures aim at preventing conflicts of interest and would also apply to former ministers within 12 months after their resignation. A person falling within the scope of the draft Act would have to notify a suspension board of his or her intention to transfer to a new position, and that board could impose a suspension period. The draft Act contains provisions on the status of the suspension board as well as its duties and powers. Consideration of the proposal in Parliament is ongoing⁶⁵.

The election and party funding legislation was amended. A legislative proposal, included in the 2024 Government legislative plan, was submitted to Parliament in November 2024, and the Parliament adopted the proposal in June 2025. The legislative amendments entered into force on 1 July 2025. The amendments aim to improve the provisions and practices regarding the disclosure of electoral and party funding. The amended legislation also includes the requirement of public disclosure of any individual support above EUR 2,000 (EUR 1,100 in municipal elections), in order to create the same level of transparency for subsidies and loans, given that the latter would under the

⁵⁹ Transparency Register Act. 2024 Rule of Law Report, Finland, pp. 14-15.

⁶⁰ Country visit Finland, Ministry of Justice.

⁶¹ Country visit Finland, Ministry of Justice. Transparency Register (2025). Transparency International Finland (2025), written input, p. 12.

⁶² Country visit Finland, Ministry of Justice. 2024 Rule of Law Report, Finland, pp. 14-15.

⁶³ Country visit Finland, Transparency International Finland. Transparency International Finland (2025), written input, p. 12.

⁶⁴ Finnish Government (2025), written input, p. 17.

⁶⁵ These obligations would apply extensively to transfers to private sector operators, but not to public bodies, the European Union, an international organisation, an international body or a political party referred to in the proposal. Government proposal HE 90/2024 vp. Finnish Government (2025), written input, p. 17. 2024 Rule of Law Report Finland, p. 15. Country visit Finland, Prime Minister’s Office and Transparency International Finland.

new proposal be notified to the National Audit Office.⁶⁶ Some stakeholders have underlined the lack of credible sanctions in the legislation, as well as issues regarding the ability of the general public and NGOs to audit the data submitted⁶⁷.

Awareness-raising activities help bring attention to the Whistleblower Act. The national law aiming at transposing the Directive on whistleblower protection entered into force in 2023. The Ministry of Justice continued a training project to increase knowledge of the Whistleblower Act, which ran until end of April 2025. The project offered trainings to experts responsible for handling the whistleblowing reports, since citizens can report misconducts through different channels to authorities or electronically to the police⁶⁸. Transparency International acknowledges the effectiveness of the channels, while emphasizing the limited scope of the legislation in force, which does not include complaints made in the workplace⁶⁹.

New initiatives and legislation address public procurement and urban and land use planning as high risk sectors for corruption. Businesses' attitudes towards corruption in the EU shows that 21% of companies in Finland (EU average 25%) think that corruption has prevented them from winning a public tender or a public procurement contract in practice in the last three years⁷⁰. 85% of businesses perceive the level of independence of the public procurement review body (The Market Court) as very of fairly good when it is reviewing public procurement cases⁷¹. Public procurement (including bid rigging) remains the main high-risk sector of corruption⁷². The Single Market and Competitiveness Scoreboard on access to public procurement in Finland reports 15% of single bids for 2023 (EU average 29%). Amendments to the Procurement Act took effect in July 2024 and enhanced the Finnish Competition and Consumer Authority (FCCA)'s competences regarding illegal direct procurements. Another amendment is being prepared to expand the FCCA's competences to national construction contracts. In contrast, business stakeholders highlight the lack of timely and decisive enforcement of the FCCA's rulings, undermining the credibility of the institution and increasing risks of corruption. In January 2025, the Ministry of Finance initiated a project to establish a procurement information repository, to increase transparency in the public sector's purchase invoices. Other risk sectors include urban and land use planning, specialised procurement (such as for example healthcare supplies) as well as critical functions and trading of confidential information⁷³. Through the project "Strengthening the fight against corruption" launched in April 2024, the Ministry of

⁶⁶ Government proposal HE 190/2024 vp. The legislation amends the Candidate's Election Funding Act, the Electoral Act and the Citizens' Initiatives Act. Finnish Government (2025), written input, p. 18. Country visit Finland, Ministry of Justice. 2024 Rule of Law Report, Finland, p. 16.

⁶⁷ Country visit Finland, Transparency International Finland.

⁶⁸ As of January 2025, the project's trainings and other awareness raising events have reached approximately 6 500 persons. Country visit Finland, Ministry of Justice and National Prosecution Authority. Finnish Government (2025), written input, pp. 16-17. 2024 Rule of Law Report, Finland, p. 17.

⁶⁹ Country visit Finland, Transparency International Finland.

⁷⁰ Flash Eurobarometer 557 on Businesses' attitudes towards corruption in the EU (2025). This is 4 percentage points below the EU average.

⁷¹ Figure 59, 2025 EU Justice Scoreboard.

⁷² Country visit Finland, National Police Board, Finnish Competition and Consumer Authority, Confederation of Finnish industries, Finnish Chamber of Commerce and National Prosecution Authority. Finnish Government (2025), written input, pp. 18-20.

⁷³ Finnish Government (2025), written input, p. 18. Country visit Finland, National Police Board and Transparency International Finland. National Police Board (2025), additional written input, pp. 2-3. Confederation of Finnish Industries (2025), written input, pp. 2-3.

Justice is developing a regular situational report which would serve as a tool for monitoring the corruption situation and as a basis for planning anti-corruption measures⁷⁴.

III. MEDIA PLURALISM AND MEDIA FREEDOM

The national regulatory authorities are undergoing structural changes while their independence remains stable. Since the publication of the 2024 Rule of Law report, there has been an internal restructuring of the national regulatory authority Traficom. The aim is to be as clear as possible in terms of both subject areas and management to ensure efficient implementation of tasks⁷⁵. Traficom has taken over all media accessibility supervision from the Regional State Administrative Agency for Southern Finland in January 2025 and expects to receive new tasks linked to the implementation of the European Media Freedom Act. Its resources have been stable amidst the Government's general austerity measures but given the new tasks, its workload is growing⁷⁶. The second national regulatory authority, the National Audiovisual Institute, will merge with another institution, the Arts Promotion Centre Finland, in January 2026. The reform aims to strengthen the quality of the two institutes' services, operations, and governance without affecting their tasks⁷⁷. A working group has discussed possible changes concerning age limits for accessing audiovisual media services that would fall within the remit of the National Audiovisual Institute⁷⁸. The institute has had to cut some tasks related to supervision of audiovisual media services due to its limited resources⁷⁹. No developments have been noted regarding the authorities' independence and the Media Pluralism Monitor (MPM) 2025 finds a very low risk in this field⁸⁰.

The updates of the ethical rules for the press have started to apply and the self-regulatory Finnish Council for Mass Media continues to deal with a high number of complains about journalistic ethics. The ethical rules for the press have been reviewed and they have become applicable in October 2024⁸¹. The purpose is, among others, to take account of changes brought by the digital environment and to make the rules easier to use⁸². The ethical rules contain new sections on, for example, external funding and removing editorial content online⁸³. The Finnish Council for Mass Media has published a guidebook⁸⁴ on the application of the new rules and training has been organised for journalists to become familiar with the rules. The self-regulatory Council continues to report a high number of complaints alleging violation of journalistic ethical rules in journalistic content. The funding that it receives from the Ministry of Justice has been slightly reduced⁸⁵. To address the longer processing periods, the Council has deployed

⁷⁴ Country visit Finland, Ministry of Justice. Finnish Government (2025), written input, p. 17. The Ministry of Justice aims to repeat the analysis every two years. As planned, the Ministry of Justice recruited project officers in 2024 to carry out this project.

⁷⁵ Traficom (2024).

⁷⁶ Country visit Finland, Traficom; Centre for Media Pluralism and Media Freedom (2025), p. 19-20.

⁷⁷ 2024 Rule of Law Report, Finland, p. 18; Arts Promotion Centre Finland (2025); Country visit Finland, National Audiovisual Institute.

⁷⁸ 2024 Rule of Law Report, Finland, p. 18.

⁷⁹ Country visit Finland, National Audiovisual Institute.

⁸⁰ Centre for Media Pluralism and Media Freedom (2025), p. 19.

⁸¹ Finnish Council for Mass Media (2024).

⁸² 2024 Rule of Law Report, Finland, p. 18.

⁸³ Finnish Union of Journalists (2024); Finnish Council for Mass Media (2025).

⁸⁴ Finnish Council for Mass Media (2024).

⁸⁵ Finnish Council for Mass Media (2025); Country visit Finland, Finnish Council for Mass Media, and Ministry of Justice; Finnish Union of Journalists (2024a).

temporary workforce and is working on an AI project⁸⁶. MPM 2025 considers that media market pluralism continues to be an area of very high risk driven by the extensive combined market share of the largest media owners⁸⁷.

The Government has proposed new legislation to further strengthen the independence of the public service media, though it faces funding constraints. The Parliamentary working group, which examined the need to amend the existing legislation regarding the Finnish Broadcasting Company's (Yle) independence and editorial neutrality, published its report in September 2024. Based on the recommendations made in the report⁸⁸, the Government has proposed new legislation regarding the criteria for the selection and dismissal of executives involved in decision-making and editorial policy of the public service media. The proposed rules aim to take into account the obligations of the European Media Freedom Act. The working group also agreed to add a provision requiring the public service media to promote transparency in its finances and operations. The relevant proposal was submitted to the Parliament in April 2025⁸⁹. The independence of the public service media is generally considered to be high⁹⁰. The MPM 2025 continues to report a low risk regarding the independence of public service media⁹¹. In parallel, to improve operational efficiency, the funding for the public service media has been limited by freezing the annual index adjustment for the period 2025-2027. In addition, the value-added tax paid by public service media will be permanently increased from 10 to 14 percent as of 2026⁹². The changes have led to decisions to reduce more than 300 employees due to lay-offs and retirement of staff⁹³. Journalists and the public service media have criticised the amendment, as it is affecting not only jobs but the production and availability of particularly local and regional media content in Finland⁹⁴. Private media, on the contrary, considers that the changes are proportionate to the Government's general austerity measures and take into account financial restraints that the private media is facing⁹⁵.

Some further progress has been made on the recommendation to strengthen the right of access to information⁹⁶. Due to changes in the national security environment, the Finnish Government has decided to assess the need for changing secrecy provisions in the Act on the Openness of Government Activities. The assessment involves consulting stakeholders, possibly carrying out external studies, and setting up a new working group. Based on the findings of the previous working group⁹⁷ and the new preparatory work, the aim is to finalise a new proposal in the next Government term⁹⁸. A

⁸⁶ Country visit Finland, Finnish Council for Mass Media.

⁸⁷ Centre for Media Pluralism and Media Freedom (2025), pp. 23-24.

⁸⁸ Finnish Government (2025), written input, p. 23.

⁸⁹ Government proposal HE 34/2025 vp.

⁹⁰ Country visit Finland, Finnish Union of Journalists, Finnish Media Federation and Finnish Council for Mass Media.

⁹¹ Centre for Media Pluralism and Media Freedom (2025), pp. 36-37.

⁹² Act amending section 3 of the Act on the State Television and Radio Fund; Act amending the Act on the Value Added Tax; Country visit Finland, Ministry of Transport and Communications; Public Media Alliance (2024).

⁹³ Yle (2025a); Yle (2025b).

⁹⁴ Finnish Union of Journalists (2024b), Finnish Union of Journalists (2025). Country visit Finland, Public Service Broadcaster.

⁹⁵ Finnish Media Federation (2024); Country visit Finland, Finnish Media Federation.

⁹⁶ 2024 Rule of Law Report recommended Finland to "[f]urther advance with the reform of the Act on the Openness of Government Activities to ensure effective and wider access to documents taking into account the European standards on access to official documents."

⁹⁷ 2024 Rule of Law Report, Finland, pp. 19-20; Ministry of Justice (2023).

⁹⁸ Finnish Government (2025), written input, pp. 20-21.

dedicated working group already made recommendations in December 2023 regarding increasing the effectiveness of the Act on the Openness of Government Activities⁹⁹. Finland has ratified the Council of Europe Convention on Access to Official Documents¹⁰⁰. Media stakeholders have welcomed the electronic transparency register established by the Transparency Register Act, considering that it improves access to information about lobbying activities and can facilitate journalistic work¹⁰¹. Given that further assessment will be conducted and the transparency register improves access to certain information in the meanwhile, there has been some further progress on last year's recommendation.

The framework for the protection of journalists has remained stable. Since the 2024 Rule of Law Report, no new alerts for Finland have been published on the Council of Europe's Platform to promote the protection of journalism and safety of journalists¹⁰². Ten incidents have been reported in the Media Freedom Rapid Response platform. The majority of them concern politicians discrediting media, including the public service media¹⁰³. A recent survey shows that 72% of journalists in Finland have experienced verbal harassment¹⁰⁴. Work is ongoing to transpose the EU Anti-SLAPP Directive¹⁰⁵ while no SLAPP cases or systematic political pressure have been recently identified in Finland¹⁰⁶. Media companies typically have clear practices on how to defend their employees from SLAPP cases¹⁰⁷. Stakeholders mostly highlight challenges stemming from the dominance of global online platforms on advertising markets and its impact on the economic sustainability of media companies¹⁰⁸. As regards the Supreme Administrative Court's ruling whereby a compensation by a media company of journalists' costs of a criminal procedure would be accounted as part of their taxable income¹⁰⁹, the Finnish Government is currently preparing to change the law from 2026 onwards to make the legal expenses paid by an employer exempt from tax if the employee's act occurred as part of their work duties¹¹⁰.

IV. OTHER INSTITUTIONAL ISSUES RELATED TO CHECKS AND BALANCES

The law-making process is overall inclusive, though stakeholders highlight areas for improvement. In 2024–2025, the Government carried out a survey on quality indicators for legislative drafting, with preliminary results indicating that the quality of the process in different thematic areas remained comparable to previous years¹¹¹. The works on updated guidelines on stakeholder engagement in legislative drafting are being finalized, with expected adoption later in 2025¹¹². While there is a robust framework for impact

⁹⁹ 2024 Rule of Law Report, Finland, pp. 19-20; Ministry of Justice (2023).

¹⁰⁰ The Council of Europe Convention on Access to Official Documents (CETS No. 205), also known as the *Tromsø Convention*, entered into force on 1 December 2020.

¹⁰¹ Country visit Finland, Finnish Media Federation, Finnish Union of Journalists.

¹⁰² Council of Europe, Platform to promote the protection of journalism and safety of journalists, Finland.

¹⁰³ Media Freedom Rapid Response (2025).

¹⁰⁴ Journalisti (2025).

¹⁰⁵ Finnish Government (2025), written input, p. 24.

¹⁰⁶ Country visit Finland, Finnish Media Federation, Council for Mass Media, Finnish Union of Journalists, Ministry of Justice and Transport and Communications, Traficom and the National Audiovisual Institute.

¹⁰⁷ Country visit Finland, Finnish Union of Journalists.

¹⁰⁸ Country visit Finland, Public Service Media, Finnish Media Federation, Finnish Union of Journalists.

¹⁰⁹ 2024 Rule of Law Report, Finland, pp. 20-21.

¹¹⁰ Yle (2024).

¹¹¹ Country visit Finland, Ministry of Justice.

¹¹² Country visit Finland, Ministry of Justice; Finnish Government (2025), written input, p. 25

assessments of legislative proposals, stakeholders report an increased practice of submitting several partial proposals rather than a complete one, limiting the possibility to properly assess the cumulative impact of the amendments¹¹³. Civil society stakeholders also reported instances where they were contacted in later stages of the legislative procedure, with less time to respond in comparison to previous years¹¹⁴. In practice, instead of a minimum of 6 weeks¹¹⁵, the consultation may be as short as two weeks or even several days, which can be challenging especially when consulting on important pieces of legislation¹¹⁶. At the same time, business stakeholders reported that consultations on laws affecting areas of their work are sufficient¹¹⁷.

Almost eight in ten companies surveyed in Finland express confidence in the effectiveness of investment protection. 79% of companies are very or fairly confident that investments are protected by law and courts¹¹⁸. Business stakeholders perceive the legal framework favourably as regards investment protection¹¹⁹. As regards authorities relevant for economic operators, 82% of companies perceive the level of independence of the national competition authority (the Finnish Competition and Consumer Authority) as very or fairly good¹²⁰. There are no judicial mechanisms in place at the level of the Supreme Administrative Court to ensure the implementation of administrative court judgments¹²¹.

On 1 January 2025, Finland had 1 leading judgment of the European Court of Human Rights pending implementation, a decrease of 1 compared to the previous year¹²². Finland did not have any leading judgments from the past 10 years pending implementation¹²³. The only leading judgment, pending implementation for more than 12 years, concerns the violation of the right not to be punished twice¹²⁴. As regards the respect of payment deadlines, on 31 December 2024 there were no cases awaiting confirmation of payments (same as in 2023)¹²⁵. On 16 June 2025, the number of leading judgments pending implementation had remained 1¹²⁶.

The civil society framework remains open, although some stakeholders continue to report a change in the narrative concerning the role of civil society actors. Civic

¹¹³ Country visit Finland, Parliamentary Constitutional Committee, Chancellor of Justice, Advisory Board for Civil Society Policy, Demla, Human Rights Center.

¹¹⁴ Demla (2025), written input, pp. 1-2; Country visit Finland, Advisory Board for Civil Society, Human Rights Center.

¹¹⁵ As stipulated in the current version of the guidelines on stakeholder engagement in legislative drafting.

¹¹⁶ For example the Border Security Act.

¹¹⁷ Finnish Chamber of Commerce (2025), written input, p. 1; Confederation of Finnish Industries (2025), written input, p. 1.

¹¹⁸ Figure 54, 2025 EU Justice Scoreboard.

¹¹⁹ Finnish Chamber of Commerce (2025), written input, p. 2; Confederation of Finnish Industries (2025), written input, p. 2.

¹²⁰ Figure 60, 2025 EU Justice Scoreboard.

¹²¹ Figure 49, 2025 EU Justice Scoreboard. The data presented reflects exclusively the mechanisms in place at the level of the highest administrative jurisdictions; the same or other mechanisms may be in place at lower instance administrative courts.

¹²² For an explanation of the supervision process, see the [website](#) of the Council of Europe.

¹²³ All figures calculated by the European Implementation Network (EIN) and based on the number of cases that are considered pending at the annual cut-off date of 1 January 2025. EIN (2025), written input, pp. 3-4.

¹²⁴ Judgment of the ECtHR, 11828/11, Nykanen v. Finland, pending implementation since 2012.

¹²⁵ Council of Europe (2025), p. 156.

¹²⁶ Data according to the online database of the Council of Europe (HUDOC).

space in Finland remains to be considered “open”¹²⁷. In the context of austerity measures, the Government has envisaged cuts in governmental grants for 2025¹²⁸, reaching up to 30% in certain sectors¹²⁹. Stakeholders expressed concerns in this regard, noting that civil society organisations depend, to a large extent, on public funds¹³⁰. The Government has expressed its readiness to further engage in a dialogue in this regard, which is seen as positive by stakeholders¹³¹. The budget allocated to the National Human Rights Institution for 2025 has slightly increased¹³². Some stakeholders noted an ongoing change of narrative on the role of civil society actors. They also reported on a recently increasing trend of statements of some politicians openly criticising certain institutions¹³³. Stakeholders welcome the fact that the idea of merging the tasks of specialised ombudsman institutions has been abandoned since keeping them separate will, in their view, allow for a more effective protection of rights.

¹²⁷ CIVICUS (2024).

¹²⁸ Finnish Government (2025), written input, pp. 31-32.

¹²⁹ Country visit Finland, Advisory Board for Civil Society Policy.

¹³⁰ Country visit Finland, Advisory Board for Civil Society Policy.

¹³¹ Country visit Finland, Advisory Board for Civil Society Policy, Amnesty International, Demla, Human Rights Centre.

¹³² Finnish Government (2025), written input, p. 26.

¹³³ Such as the deputy Chancellor of Justice, Equality Ombudsman and Child Ombudsman. Country visit Finland, Parliamentary Ombudsman, Human Rights Centre.

Annex I: List of sources in alphabetical order*

* The list of contributions received in the context of the consultation for the 2025 Rule of Law report can be found at https://commission.europa.eu/publications/2025-rule-law-report-targeted-stakeholder-consultation_en.

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Act No. 257/2002, Legal Aid Act.

Government proposal HE 90/2024 vp.

Government proposal HE 190/2024 vp.

Government proposal HE 34/2025 vp.

Annex II: Country visit to Finland

The Commission services held virtual meetings in March 2025 with:

- Advisory Board for Civil Society Policy
- Amnesty International Finland
- Anti-corruption Cooperation Network
- Chancellor of Justice
- Confederation of Finnish Industries (replies received in writing)
- Council for Mass Media in Finland
- Demla
- Financial Intelligence Unit
- Finnish Association of Judges
- Finnish Bar Association
- Finnish Chamber of Commerce (replies received in writing)
- Finnish Competition and Consumer Authority
- Finnish Media Association
- Human Rights Centre
- Ministry of Finance
- Ministry of the Interior
- Ministry of Justice
- Ministry of Transport and Communications
- National Audiovisual Institute
- National Bureau of Investigation
- National Courts Administration
- National Police Board
- National Prosecution Authority
- Parliamentary Constitutional Law Committee
- Parliamentary Ombudsman
- Prime Minister's Office
- Supreme Administrative Court
- Supreme Court
- Traficom
- Transparency International Finland
- Union of Finnish Journalists
- Yleisradio Oy

* The Commission also met the following organisations in a number of horizontal meetings:

- Amnesty International
- Araminta
- Civil Liberties Union for Europe
- Civil Society Europe
- European Civic Forum
- European Partnership for Democracy
- European Youth Forum,

- International Commission of Jurists
- International Federation for Human Rights (FIDH)
- JEF Europe
- Philea – Philanthropy Europe Association.
- Transparency International