

Media policy at different distances

A comparative study of the
arm's length principle in Nordic
news media subsidy regulation

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Foreword

Nordicom has been part of Nordic cooperation for more than fifty years. The organisation is therefore only a few years younger than the introduction of the first direct subsidies for Nordic news media. This is no coincidence. The implementation of direct media support created an entirely new need for research-based knowledge about the media landscapes of the Nordic countries.

The design, scope, and consequences of direct media subsidies have, throughout these decades, been recurring themes in books and scholarly articles published by Nordicom. In this report, however, attention is directed towards a somewhat different aspect of the Nordic subsidy systems: decision-making processes and the principle of arm's length governance.

The idea that political decisions should be limited to establishing the overarching conditions for artistic, cultural, and journalistic activity – without influencing content – is broadly accepted across the Nordic region. Even so, the ways in which the Nordic countries implement this principle differ more than one might initially assume. Some countries rely, for example, on separate bodies to make decisions regarding the allocation of support, thereby ensuring the desired distance through organisational design. Others have refrained from such arrangements for precisely the same reason – to safeguard the arm's length principle.

With this report, we have sought to collect, synthesise, and disseminate knowledge about how the arm's length principle is applied in practice within Nordic media-subsidy legislation in force at the beginning of 2026.

Jonas Ohlsson, director, Nordicom

Summary

This report examines how the ideal of arm's length distance is operationalised within the news media subsidy frameworks in force across the Nordic countries in early 2026. The distance between decision-making authority and political executive power is analysed across three dimensions: organisational separation, the design of the decision-making process, and the availability of oversight and review mechanisms. This is timely because Nordic media subsidy systems are being redesigned for a digital, platform-dominated market, making institutional safeguards against undue political influence more consequential than before.

The report's conclusions may be summarised in five points:

1. From mechanical, criteria-based subsidy to selective and discretionary schemes:

Since the early 2010s, Nordic news media subsidy systems have shifted from decades of relatively mechanical, criteria-driven, and rights-based arrangements towards schemes in which a larger and more heterogeneous set of actors competes for a limited funding envelope, thereby increasing the importance of assessment and decision rationales.

2. The arm's length principle is a shared norm but is institutionalised differently:

All Nordic countries share the ideal that political authorities should set the regulatory framework and budgets but not decide individual grants. How this ideal is translated into practice varies markedly depending on legislation, organisational design, and administrative culture.

3. Three dimensions reveal distinct configurations of autonomy:

The report demonstrates that arm's length distance is not a simple continuum. Organisational separation, decision-process design, and oversight mechanisms can be combined in various ways, producing different forms of protection against undue political influence.

4. There are visible and less visible arrangements of organisational arm's length:

Denmark, Iceland, and Sweden operate separate decision-making bodies that signal distance from day-to-day administration. Norway and Finland rely more on authority- and ministry-based models (Finland particularly with respect to its minority-language subsidy), in which organisational arm's length is less visibly institutionalised.

5. The greatest variation concerns legal oversight:

Norway has a dedicated appeals body and provides for judicial review, whereas

Denmark, Iceland, and Sweden largely render decisions non-appealable at the administrative level. Finland provides for reconsideration through a rectification procedure, followed by judicial review, but without a specialised media appeals body.

1. Nordic approaches to media subsidy regulation

This overview report examines how the arm's length principle is articulated, institutionalised, and operationalised within the current state-administered news media subsidy schemes across the Nordic region – that is, the extent to which a formal and organisational separation exists between political decision-making and executive authority.

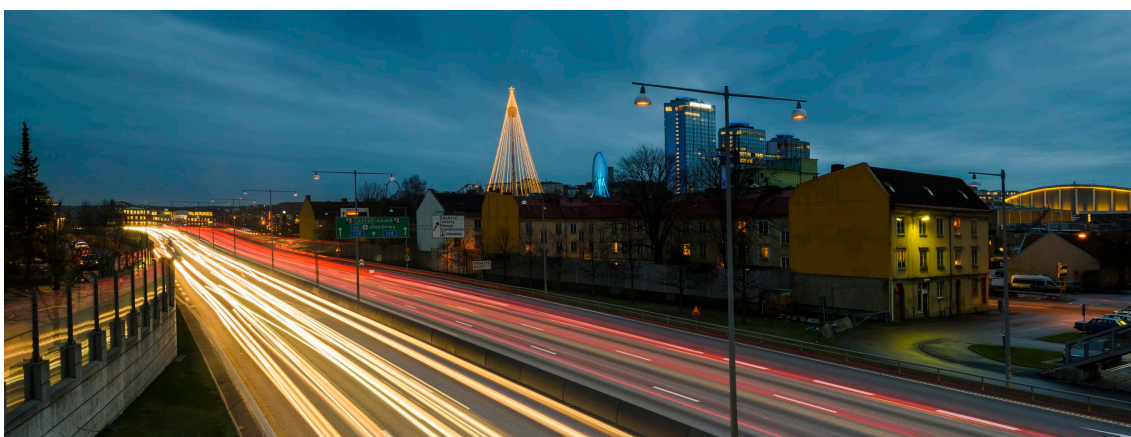


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Adopting a descriptive approach, the report maps how the arm's length principle is embedded in Nordic news media support systems, as reflected in prevailing legislation and regulatory frameworks. Comparative analyses remain relatively scarce in many areas of media studies, including media policy. By concentrating specifically on direct and selective news media subsidies in the Nordic countries and the application of the arm's length principle, this report seeks to address a part of that gap.

This issue is timely in several ways. **First**, almost all existing news media subsidy schemes in the Nordic region have recently been revised, or are currently undergoing revision, while new forms of support have been introduced. These reforms are driven by changes in audience behaviour towards increasingly digital news consumption, as well as by the profound impact of global platform companies on the business models of domestic news media organisations – not least for the local and regional ones (Nordicom, 2026: 72, 83–94). Today, Nordic news media subsidies are no longer primarily directed at daily newspapers or print media.

Second, Nordic debates concerning how active policies should be balanced against the risk of overly narrow definitions of culture and media have intensified in recent years (Kulturanalys Norden, 2022). This debate takes place in markets with a more than

50-year-long tradition of direct subsidies to privately owned news media, which in international comparisons are characterised by an active state presence in the media market and strong press freedom (Grönlund et al., 2024).

Third, the European discussion on the state's general responsibility for and influence on the media market, for example, through funding and governance, has also grown in the last few years (Born & Lewis, 2026: 4–12). The question of a more active media policy may raise concerns about undue political influence over the free media, the global trend toward increasingly unfree media, and so-called media capture – carried out either directly by governments or indirectly by politically connected vested interests (Trevisan, 2024).

The relevance of these more recent motives becomes clearer when viewed in conjunction with the extensive body of research demonstrating that subsidies and other forms of market intervention affect markets in one way or another (Laffont & Tirole, 1991; Stiglitz, 2009: 13–51). Given that such support inevitably influences market outcomes, it becomes relevant to examine the institutional arrangements designed to maintain distance between funding decisions and political authority. If operational control over the subsidy framework or its adjudicating authority is not insulated from political actors, resulting decisions may be regarded as, or in fact be, politically motivated favouritism rather than impartial governance. This risk is particularly problematic in a sector whose democratic function is to scrutinise political power.

A descriptive comparison approach is apt given the complexity, fluidity, and political significance of contemporary regulatory frameworks as institutional conditions shaping media policy. Systematic comparative descriptive research enables the identification of similarities and differences across the Nordic countries and clarifies how the arm's length principle is translated from a normative ideal into concrete regulatory arrangements within news media subsidy systems.

1.1 Report overview

Section 1 presents the arm's length principle in greater detail and offers a working definition, followed by a concise account of the historical development of the Nordic news media subsidy system.

Section 2 introduces and analyses the three dimensions along which the arm's length principle is examined. The Nordic news media markets are then briefly characterised and positioned in broad terms using a few analytical frameworks; this discussion covers the media systems of Denmark, Finland, Iceland, Norway, and Sweden (the specific circumstances of the Faroe Islands, Greenland, and the Åland Islands are not examined).

Section 3 then examines each dimension on a country-by-country basis in separate subsections, followed by a short comparative summary. The level of descriptive detail varies

between cases owing to structural differences in the complexity and institutional layering of the respective national frameworks.

Section 4 presents a more integrated comparative analysis for each dimension.

The report concludes in Section 5 with a short set of final reflections.

1.2 The ideal of arm's length distance

What does the principle of arm's length distance entail in general terms, and more precisely in the context of media policy? In brief, it is a public policy principle that operates across the fields of economics, law, and politics in many European societies, as well as in other parts of the democratic world. The principle is implicitly embedded in the constitutional separation of powers between the judicial, executive, and legislative branches of government. It is also reflected in the distribution of authority among governmental agencies and in the institutional relationship between the state and the media (Hillman Chartrand & McCaughey, 1989). In cultural policy contexts, the principle was developed not least by the economist John Maynard Keynes and through his ideas concerning semi-autonomous non-governmental bodies in post-war Britain (Upchurch, 2011).

This principal remains highly salient in the Nordic countries, where it is articulated, for example, in the Nordic Council of Ministers' (2024) position paper *Nordic co-operation programme for culture 2025–2030*. There it is stated that the "principle of keeping an arm's length distance between politics and culture provides guidance" and that "cultural freedom, a free and independent media and the arm's length principle together lay the foundation for free speech" (Nordic Council of Ministers, 2024: 3, 5).

Following Hillman Chartrand and McCaughey (1989), this report understands the arm's length principle as a normative institutional ideal or a governance doctrine centred on the delegation of decision-making authority to intermediary bodies that operate at a formal distance from political executive power. The principle entails a structured separation between political authorities, responsible for defining the overall policy framework, and arm's length institutions, which are granted organisational and procedural autonomy in the allocation and administration of news media subsidies. At its core, the principle holds that political decision-making should not extend to individual funding decisions, nor to influencing editorial content or the media's watchdog function.

1.3 Subsidies in the Nordic media welfare states

To examine how the normative ideal of the arm's length principle is realised in practice, it is necessary to clarify what is meant by media subsidies and to outline their historical development. Direct and selective media subsidies emerged in the Nordics in the late 1960s and early 1970s, whereas indirect and general forms of media support were introduced considerably earlier, in some cases as early as the nineteenth century. These indirect and general measures have typically taken the form of reduced taxes or fees, including exemptions from value-added tax, lower advertising taxes, and subsidised postal distribution. Such forms of support have generally applied to the entire media or press industry, although notable exceptions can be identified.

By contrast, direct media subsidies have been allocated to individual media companies and organisations, for example, through favourable loan arrangements, operational grants, or financial incentives intended to stimulate cooperation in areas such as distribution. These subsidies have primarily been directed towards the newspaper sector (Gustafsson, 1996: 79; Waller, 1972: 2).

In essence, indirect support measures cover all, or almost all, actors in the market, and direct support, by contrast, is more selective: Only some market actors are deemed eligible, which makes direct schemes particularly pertinent to examine through the lens of the arm's length principle.

1.3.1 Media subsidies to stop closures of newspapers

The introduction of selective direct subsidies in the Nordics was frequently motivated by a perceived need to dampen a wave of newspaper closures triggered by post-war deregulation, high inflation, and the restructuring of media markets in the 1950s and 1960s. The schemes were targeted at newspapers occupying weak market positions, with the explicit aim of enhancing their competitive capacity vis-à-vis economically stronger titles. More fundamentally, these measures were intended to safeguard media pluralism – particularly the diversity of press voices that had developed within the system of party-affiliated newspapers (Gustafsson, 2010: 75–82).

At their core, the various press subsidy schemes were directed at the political opinion-forming function of the daily press. The ambition of these measures was to secure pluralism within the daily newspaper sector on the premise that the press would be better equipped to fulfil its functions in a democratic society if alternatives were available. The strong tradition of party-affiliated newspapers meant that the form of pluralism primarily sought was the existence of many independent titles representing different party-political

orientations. The subsidies thus emphasised the role of daily newspapers as instruments of representative democracy, rather than their functions as general news and advertising outlets or as providers of entertainment (Gustafsson, 1981: 91–100; Bjerke & Halvorsen, 2023: 40–42, 53).

However, other rationales have also been invoked, including industrial and cultural policy considerations. From the early 2010s onwards, media subsidies have increasingly been justified by an ambition to safeguard the quality and the presence of news and editorial content (Flensburg, 2015).

Another way to account for the introduction and continuation of the subsidies is through the characterisation of the Nordic countries as so-called media welfare states. In these media systems, subsidies are not merely understood as support for a particular sector, but rather as instruments for sustaining the democratic function of the news media by fostering conditions under which democratic discourse can flourish through trustworthy journalism (Syvertsen et al., 2014: 17–19, 47).

Initially, selective interventions aimed at preventing the closure of daily newspapers were implemented in Finland, Norway, and Sweden, but not in Denmark or Iceland. In Norway and Sweden, subsidies were distributed directly to the affected newspaper companies, whereas in Finland, allocation occurred partially through the political parties. The scale of these support measures expanded during the 1970s and, to some extent, during the 1980s (Gustafsson, 1996: 79; Bjerke & Halvorsen, 2023: 63, 74).

In Sweden, using the largest media market in the Nordics as an example, the subsidies operated for a long period under a rights-based ordinance. If an applicant newspaper met certain criteria relating to market position, the proportion of editorial content, and the share of readers in its place of publication, it was entitled to receive support (SOU 2013:66, 2013: 85). The allocation procedure itself was thus relatively straightforward and mechanical. By designing these early Nordic subsidy schemes in this mechanical or automatic manner, policymakers also sought to safeguard the principle of arm's length distance between politics and the media (Bjerke & Halvorsen, 2023: 248).

Today, the Nordic subsidy schemes generally take a different form. There is now a predetermined funding envelope for which eligible actors may apply, and the group entitled to seek support is both larger and more heterogeneous than previously. The digital transformation – characterised by changing patterns of media consumption, media convergence, and the introduction of new engagement measurement instruments – has also meant that assessments are less a matter of automatic rule application and increasingly dependent on discretionary judgement (Bjerke & Halvorsen, 2023: 263). In other words, the preparatory documentation and the specific grounds invoked in

individual decisions have assumed greater significance.

1.3.2 News media subsidies of today

The Nordic news media subsidies of today are not only regulated through national legislation and ordinances. In EU member states Denmark, Finland, and Sweden, the subsidy schemes require approval from the European Commission, while in non-EU Norway and Iceland, media subsidies are subject to approval by the EFTA Surveillance Authority (Nordicom, 2022). Thus, although media policy formally remains a national competence, the design and implementation of subsidy schemes are embedded in a broader supranational regulatory framework.

This supranational dimension has been further reinforced through the implementation of the European Media Freedom Act (EMFA). Under the EMFA, EU member states are required to respect the effective editorial freedom and independence of media service providers in the exercise of their professional activities. Moreover, member states – including their national regulatory authorities – must not interfere with or attempt to influence editorial policies or editorial decisions (EU 2024/1083). The EMFA regulation therefore clarifies and strengthens, in several respects, the requirement to maintain an appropriate institutional distance between political executive power, substantive decision-making, and the media sector.

Against this backdrop of both national and supranational regulation, the practical organisation of Nordic news media subsidies warrants closer attention. Funds for direct media subsidies are allocated through the state budget, while their distribution is generally administered by public authorities or ministries. Budgetary control thus remains the ultimate steering mechanism. Consequently, the arm's length principle operates only within politically defined financial and regulatory parameters, highlighting the inherent tension between formal guarantees of independence and the structural conditions of public funding.

The question, then, is how the principle of arm's length distance is manifested in the regulation of direct and selective news media subsidy schemes in the Nordic countries. This report's indicators of autonomy and distance from political influence include the presence of a separate decision-making authority, legislation that safeguards independence, and conflict-of-interest-regulated decision-making and application procedures free from political interference.

Verhoest and colleagues' (2004) conceptual review "The study of organisational autonomy". Accordingly, this report examines the formal distance between decision-making authority and political executive power. Analysing informal influence, everyday administrative practice, and decision outcomes would require a different research design. The analysis therefore remains at a relatively general level.

It should consequently be noted that the primary empirical material comprises the Danish law on media subsidy, 2013 [Lov om mediestøtte], and Ordinance regarding media subsidy [Bekendtgørelse om mediestøtte]; the Finnish Government Decree on Press Subsidies, 2008 [Valtioneuvoston asetus sanomalehdistön tuesta/Statsrådets förordning om stöd för tidningspressen]; the Icelandic Media Law, 2011 [Lög um fjölmiðla] and the amendment to the Icelandic Media Act for Private Media, 2025 [Lög nr. 66 23. október 2025]; the Norwegian Act relating to financial support for the media, 2020 [Mediestøtteloven] and the associated provisions [forskrifter] for each form of subsidy; and the Swedish Law (2023:664; 2025:996) on Media Subsidy [Lag om mediestöd], Provision (2023:740) on Media Subsidy, and the Swedish Agency for Media's regulations regarding media subsidies (MEMYFS 2024:1, 2024).

The analysis reflects the situation as it stands in early 2026, that is, the legislation currently in force.

2.1 The Nordic media models

The relationship between the media and the political system can be understood in different ways. In their study *Comparing Media Systems*, Daniel C. Hallin and Paolo Mancini (2004) proposed three ideal-typical models for analysing variations in media-politics relations across Western democracies. Within this comparative framework, most of the Nordic countries are located within what the authors term the Northern and Central European or Democratic Corporatist Model.

This model is characterised by an early development of the press, a historically grounded transition from politically aligned and party-affiliated press towards more neutral and commercially oriented media, a high degree of institutionalised journalistic professionalism, and a comparatively strong role for the state in the media sector. In addition to all the Nordic countries except Iceland, the model can also be used to describe conditions in Central European states such as Austria, Belgium, and Germany.

A defining feature of the Democratic Corporatist Model is that the media is not understood solely as a private commercial enterprise, but also as a social institution for which the state bears significant responsibility. This normative orientation is reflected in media policy arrangements in several ways, most notably through the central role of public service media and the existence of media subsidies (Hallin & Mancini, 2004: 160–164). Such forms of state intervention, particularly direct and selective subsidies, are far less prevalent in the other two models identified by Hallin and Mancini: the Mediterranean or Polarised Pluralist Model, and the North Atlantic or Liberal Model.

Although Iceland was not included in Hallin and Mancini’s studies, Icelandic scholars contend that its media system is best understood as a hybrid or mixed case of these models and the concept of a media welfare state (Guðmundsson & Jóhannsdóttir, 2024: 156).

2.1.1 Direct subsidies to Nordic news media

In all the Nordic countries, the objectives of direct subsidies include the promotion of diversity within the news media sector. In Denmark, Iceland, and Sweden, the statutory purpose clauses also articulate an explicit ambition to strengthen national democracy. In Norway, the stated objectives further include safeguarding the institutional independence of the media subsidy administration. Finland (and to some degree Iceland, more on that later) constitutes an outlier in this respect, as it operates a temporary support scheme, which renders direct comparison with the permanent arrangements in the Scandinavian countries more difficult (Nordicom, 2026: 57–58).

If one subsequently examines the volume of funds allocated to these schemes, it is evident that the amounts have increased over time, having initially involved relatively modest sums (Gustafsson & Hadenius, 1976: 83). The levels of direct media subsidies in countries such as Denmark and Sweden have grown to substantial proportions during the last decade. In 2025, news media subsidies totalled approximately 72.6 million euros in Denmark and 78.6 million euros in Sweden (see Table 2.1).

Table 2.1 Direct news media subsidies in the Nordic countries, 2025 (EUR)

Country	Total subsidies (millions)	Per capita
Denmark	72.6	12.1
Finland	8.0	1.4
Iceland*	3.8	9.7
Norway	45.6	8.2
Sweden	78.6	7.4
Total	208.6	7.4

Comments: Exchange rate, average first half of 2025, according to the European Central Bank. *Gross, before deduction for administrative costs.

Source: *Nordic news media landscapes 2025*, Nordicom (2026).

The lowest levels of expenditure were recorded in Iceland and Finland, that is, the countries which in 2025 primarily operated temporary support schemes. Altogether, the Nordic countries allocated approximately 208.6 million euros to direct support for news media in 2025 (Nordicom, 2026: 63).

The relative ranking of the countries remains broadly similar when subsidies are assessed per capita: Denmark continues to rank high and Finland low. The notable change is that Sweden, despite allocating the largest total amount in absolute terms, records one of the lower levels of support per capita.

The mere existence of a news subsidy system offers few insights into whether, or how, the arm's length principle is applied. Rather, the degree to which the principle is upheld depends on how it is articulated within specific regulatory frameworks. The central question, therefore, concerns how this normative ideal is translated into practice across different national contexts.

3. Three dimensions of the arm's length principle in the subsidy systems

This section examines how the arm's length principle is implemented in practice, focusing on the three mentioned dimensions: the organisational models of news media subsidies, the decision process, and mechanisms of oversight.



Photo: Skandinav Bildbyrå

As stated, the primary point of reference for this report is the situation as of early 2026. Nevertheless, news media subsidy policies have undergone significant changes over the past decades and are about to evolve further in the years ahead. To highlight this dynamic nature and the ways in which the arm's length principle is translated into practice over time, the discussion is supplemented with a few historical examples and references to anticipated future developments.

3.1 Dimension one: The organisational models

The organisational and operational model – understood here as the organisation of the administration of the news media subsidy system – constitutes an initial and relevant dimension in assessing institutional distance from executive and legislative authorities. It represents one of the most visible manifestations of the arm's length principle: Without institutional independence in the day-to-day administration of either the system itself or the decision-making body, policy outcomes risk being perceived as instances of cronyism or political patronage.

This also explains why this dimension is given comparatively extensive attention, as well as the inclusion of some historical retrospectives and accounts of the design of the subsidy

schemes. However, already at a glance, it is clear that operational models vary with respect to this dimension across the Nordic countries.

3.1.1 A competence-based board in Denmark

In the Danish context, much of the framework for media policy is normally established through political media agreements negotiated between the government and one or more parties in the Danish Parliament. In short, a majority of the members of parliament must support the agreement. The current media policy agreement, presented in June 2023, covers the period 2023–2026 (Kulturministeriet, 2023).

The existing subsidy scheme was introduced in 2014, replacing an earlier distribution subsidy for printed newspapers. The subsidy scheme was amended in 2024 to facilitate a greater redistribution of support towards local and regional news media. In addition, content consisting of audio and audiovisual services can now qualify for support to a greater extent. Prior to this reform, all schemes within the media subsidy framework had been directed at traditional news media; from 2024 onwards, however, the editorial production subsidy may also be granted to two additional categories of media: magazines and weekly freesheets (*ugeaviser*). Most of the funding nevertheless remains within the principal editorial production scheme (Nordicom, 2026: 58–59).

The acts regulating these subsidies in force are the Act on Media Subsidies (Lov nr. 1604 af 26/12/2013) and the associated Ordinance (BEK nr. 127 af 05/02/2024). Under this legislative framework, the relevant support schemes are administered by a Media Board (Medienævnet). The Board consists of seven members, one of whom serves as chair. All members are formally appointed by the Minister for Culture, although one member is nominated by the industry association Danish Media and another by the Danish Union of Journalists. The chair is required to hold legal qualifications. All appointments are made for four-year terms. Collectively, the Board is expected to possess expertise in areas such as news production, media markets, the democratic role of the media, and related fields (Kammer & Blach-Ørsten, 2025: 11).

Although the emphasis is clearly placed on competence-based requirements, neither the Act nor the Ordinance contains explicit provisions that would preclude individuals with political affiliations from serving as members of the Board (Lov nr. 1604 af 26/12/2013). These possibilities are, nevertheless, constrained by the Public Administration Act's rules on disqualification. These rules specify the circumstances under which a person is disqualified from participating in the processing or decision-making of an administrative case, including situations involving personal or financial interests or other factors likely to give rise to doubts about impartiality (LBK nr. 433 af 22/04/2014).

In addition to appointing the Board's members, the Minister for Culture is also responsible for shaping its rules of procedure, which set out how the body conducts its work and makes decisions. Administrative support for the Board is in turn provided by the Danish Agency for Culture and Palaces (Lov nr. 1604 af 26/12/2013; BEK nr. 127 af 05/02/2024). The Agency is a government authority under the Ministry of Culture and contributes to

the implementation of the government's cultural policy objectives.

In the autumn of 2025, a government-appointed committee presented a proposal for a modernised media subsidy system. In brief, the proposal advocated coordinating the existing support schemes into a single unified system. However, it contained no new recommendations concerning the administration or organisation of the support system itself (Udvalg om fremtidens mediestøtte, 2025: 10).

3.1.2 Two separate subsidy systems in Finland

Unlike its neighbouring Scandinavian countries, Finland does not currently operate a comprehensive system of media subsidies. The former Finnish press subsidy scheme was largely dismantled over a period of approximately two decades from the early 1990s onwards. The process was driven by deregulation pressures from the Finnish Ministry of Finance and the European Commission, combined with a progressively constrained fiscal environment. The subsidy previously directed at smaller party-affiliated newspapers, which was formally abolished in 2008 (2007 was the last year the subsidy was in use), was instead incorporated into the general system of party funding as support for political parties' information activities (Ds 2022:14, 2022: 128). The fact that Finland practically abandoned direct press subsidies and the traditional dual Nordic subsidy model (i.e., with both indirect and direct subsidies) in the 1990s has made it somewhat of an outlier in the context of the Nordic media welfare states (Grönlund et al., 2024).

At the beginning of 2026, two targeted and selective subsidy schemes were in place: a temporary distribution subsidy for printed newspapers, the larger of the two, and a smaller scheme aimed at supporting news media published in Finland's minority languages.

The former scheme is intended for distribution companies that commit to delivering printed news media in sparsely populated areas of the country. It was introduced in response to amendments to the Postal Act that reduced postal delivery from five to three days per week. Accordingly, in 2022, the government proposed a new, time-limited state aid measure to ensure five-day newspaper delivery until 31 December 2027.

The distribution subsidy is administered by the Finnish Transport and Communications Agency (*Traficom*), which is also responsible for decisions on the allocation of support. No dedicated advisory or decision-making committee has been established within or outside the agency for this purpose. The scheme is instead managed within Traficom's ordinary organisational structure in accordance with the Government Decree on Temporary State Aid for Newspaper Distribution (FFS 820/2023). Traficom operates under the Ministry of Transport and Communications.

The latter scheme, regulated by the Government Decree on Support for Newspapers (FFS 389/2008), is intended to support newspapers and online publications published in Karelian, Romani, Sámi, and Swedish, as well as publications in sign language. It also covers the production and publication of Karelian- or Sámi-language content in connection with newspapers published in Finnish or Swedish, in addition to

Swedish-language news services.

The subsidy scheme is administered by the Ministry of Education and Culture (OKM). Preparatory work is carried out within the ministry by civil servants in the Ministry's department for cultural and arts policy, while the formal decisions are taken by the Finnish government at its plenary session (FFS 389/2008).

The fact that the scheme falls under the Ministry of Education and Culture – a ministry responsible for matters relating to the national languages, minority languages, and cultural and language policy – indicates that the support is primarily conceived as a language- and culture-policy instrument rather than as part of a broader news media market support framework. This institutional positioning also largely explains why this form of support is administered separately from other media-related subsidies and why the associated decision-making processes differ.

3.1.3 Iceland, a newcomer to direct subsidies

As already noted, Iceland's media system stands out in several respects in a Nordic comparison. Until recently, the state has been far less active in the Icelandic media market than in the other Nordic countries, and practices characteristic of the Nordic media welfare state model have, for all practical purposes, been absent. Consequently, private media in Iceland have been among the less regulated in Europe. One indication of this distinctive position within the Nordic context is that direct media subsidies – albeit temporary – were first introduced only in the early 2020s, with the aim of strengthening Icelandic media and ensuring public access to news and information in a digital and platform-dominated media environment. Prior to 2020, Iceland had no system of direct media subsidies (Guðmundsson & Jóhannsdóttir, 2024: 156–157).

Iceland's temporary media subsidy scheme for private news media, both local and national, was extended to remain in force throughout 2025. The statutory basis for this temporary regime expired on 1 January 2026 (Lög um breytingu á lögum um fjölmiðla, nr. 38/2011 [stuðningur við einkarekna fjölmiðla]). Although a more permanent scheme has been announced, it had not yet entered into force at the time of writing (Icelandic Review, 2025; ESA, 2025). Iceland therefore constitutes a methodological exception to the report's general early-2026 cut-off and is analysed based on the most recently applicable framework, namely the 2025 temporary regime.

Under that framework, Iceland established a three-member Allocation Committee (Úthlutunarnefnd) to be responsible for granting support to privately owned media. The members are formally appointed by the Minister of Culture, Innovation and Higher Education: one nominated by the Supreme Court of Iceland, one by a university collaboration committee, and one by the Icelandic National Audit Office. This last nominee must be an authorised public accountant. Alternate members are appointed in the same manner.

The Minister appoints the chair from among the members of the Committee. The chair must in turn meet the qualifications required for appointment as a district court judge.

The other members and their alternates are required to possess specialist knowledge of media matters, as well as relevant professional experience and education (Lög um breytingu á lögum um fjölmiðla, nr. 38/2011 [stuðningur við einkarekna fjölmiðla]).

There is no provision in the media subsidy legislation explicitly stating that individuals with political affiliations may not serve on the Committee. However, as in Denmark, such possibilities are constrained by the rules on disqualification and requirements of impartiality set out in the Administrative Procedure Act (Stjórnsýslulög nr. 37/1993).

3.1.4 Administrative decision-making in Norway

Norway was the first of the Nordic countries to introduce direct subsidies for newspapers, doing so as early as 1969 (Bjerke & Halvorsen, 2023: 39). Over time, the principal subsidy scheme has been expanded to encompass both print and online news and current affairs media. As in Denmark, the production subsidy for news and current affairs media constitutes Norway's largest form of direct media support. This scheme, together with the innovation and development grants, support for local broadcasting, and the subsidy for Sámi newspapers, is administered by the Norwegian Media Authority (Medietilsynet). The Media Authority operates under the auspices of the Ministry of Culture and Equality.

Until 2023, the Media Authority was supported in the preparation of decisions on production subsidies by a dedicated advisory committee (*Tilskuddsutvalget*), consisting of five members and an equal number of deputy members. All members were appointed by the Ministry for four-year terms. The committee's primary task was to assess new applications for production subsidies and to submit recommendations for decision-making (Medietilsynet, 2021: 164).

Following this administrative change, decisions in this area are now made solely by the Media Authority. An advisory support structure nevertheless remains in place for innovation and development subsidies and subsidies for local audio and audiovisual news media. In this context, funding decisions are formally adopted by the Media Authority based on recommendations from specialist advisory committees, which are appointed by the Authority.

The Advisory Committee (*Fagutvalget*) for innovation and development subsidies comprises a chair, four members, and three deputy members, all appointed for terms of up to three years. Collectively, the members are required to possess broad and complementary expertise, including competence in media and media economics, innovation, technical and digital development, and local media. In the event of a tie, the chair holds a casting vote (FOR-2018-06-26-1033). The committee for local audio and audiovisual news media is organised in a broadly similar manner and performs comparable functions (FOR-2016-02-19-166).

Beyond the mentioned formal arrangements, the composition of these committees is further shaped by wider administrative norms. Accordingly, although the relevant regulatory framework does not explicitly prohibit political representatives from serving as members, Norwegian administrative practice – comparable to that in Denmark – together

with the rules on disqualification, imposes constraints on such appointments (LOV-1967-02-10).

In this context, it should be noted that discussions have been held in Norway with regard to establishing a media subsidy council (*mediestøtteråd*). According to a proposal put forward by the Norwegian government in the late 2010s, the proposed subsidy council would determine the allocation of media support between different platforms and categories of publishers, while the industry itself would not be represented. The proposed body was envisaged as strengthening the principle of arm's length distance, deciding the allocation of funds between support schemes, and formulating the regulatory framework governing them. The council was, among other things, intended to "counteract suspicions that political interests improperly influence the distribution of media subsidy" (Meld. St. 17, 2018/19, 2018–2019: 60; author's translation). The proposal met with criticism, not least from significant sections of the media industry, and was never implemented (Bjerke & Halvorsen, 2023: 224–226).

In November 2025, the Norwegian Media Authority published a review assessing potential modernisation of the existing media subsidy system. The review did not propose changes to the organisational structure of the support scheme, focusing instead on specific issues concerning selected subsidy categories and target audiences. The review aims to provide a foundation for the development of the four-year policy framework governing direct media support for the period 2027–2030 (Medietilsynet, 2025: 2).

3.1.5 No politicians in Sweden's reformed subsidy council

In Sweden, direct press subsidies were introduced in 1971 with the aim of supporting newspapers in vulnerable market positions. With only limited modifications, this system remained largely intact for several decades. The core component of the former system, the operational subsidy, primarily targeted printed newspapers and so-called secondary newspapers, the smaller title in a local market (Ds 2022:14, 2022: 111–113).

In 2023, the Swedish media subsidy system underwent a comprehensive reform, and the restructured scheme was implemented for the first time in 2024. The current news media subsidy framework comprises four forms of support: a general editorial subsidy, an extended editorial subsidy, a transitional subsidy for newspapers that received operational support in 2023, and a newspaper distribution subsidy. The new system is platform-neutral and may be granted to general news media irrespective of distribution technology. It places a clear emphasis on local news provision and on areas with limited media coverage (Nordicom, 2026: 62).

Decisions on the allocation of subsidies are taken by the Media Subsidy Council (*Mediestödsnämnden*), a separate decision-making body operating within the Swedish Agency for the Media (*Mediemyndigheten*). The Agency is an independent administrative authority operating under the Ministry of Culture.

The Media Subsidy Council consists of a chair and between four and seven additional members. A corresponding number of deputy members is appointed, as determined by

the government, which also formally appoints all individual members of the Council. At least one member or deputy member serves as vice-chair. Both the chair and the vice-chair are required to be, or to have previously served as, judges.

Individuals who are members of parliament, government ministers, or employees of the Parliamentary Administration or the Government Offices are ineligible to serve on the Council. The same restriction applies to individuals holding full-time or substantial part-time elected offices at the municipal or regional level (SFS 2023:664).

Under the previous subsidy system, the council included, among others, representatives of political parties. Their participation reflected an established practice whereby the government provided political parties with the opportunity to nominate members. That said, this took place at a time when the structure of the support scheme meant that allocation decisions were predominantly, though not invariably, formal (Ds 2022:14, 2022:189).

3.1.6 Comparison of dimension one

Direct and selective news media subsidies are administered and organised differently across the Nordic countries (see Table 3.1). One key difference concerns institutional responsibility: In Finland, responsibility for direct subsidies is divided between two organisations, whereas in the other Nordic countries the schemes are administered by a single body. Nonetheless, one of the Finnish subsidies is primarily regarded as a language and cultural support rather than as a form of media subsidy.

Table 3.1 Organisational separation in Nordic news media subsidy systems (decision-making bodies and advisory structures)

Country	Designated decision-making body	Internal advisory structure	Organisational model
Denmark	Media Board	–	Specific body model with agency secretariat support
Finland	–	–	Authority and Government models – split across bodies
Iceland	Allocation Committee	–	Specific body model with administrative support via an agency
Norway	–	Expert advisory committees in parts of the system	Authority and advisory model
Sweden	Media Subsidy Council	–	Specific body model within an independent agency

Another difference, particularly relevant from the perspective of this report, concerns the

arrangements for designated decision-making bodies. In Denmark, Iceland, and Sweden, specific bodies are entrusted with taking funding decisions – the Danish Media Board, the Icelandic Allocation Committee, and the Swedish Media Subsidy Council.

A clear distinction between the three decision-making bodies is that political representatives are explicitly excluded in the Swedish system, whereas this is not formally the case in the Danish and Icelandic systems. Other legislation nevertheless imposes constraints on such appointments. Iceland differs from the other two in that all members of the committee are nominated by external and neutral bodies, such as the Supreme Court of Iceland, rather than being directly appointed without a prior nomination procedure, or by a media-related party concerned.

In Finland and Norway, no such specialised decision-making bodies exist – although Norway retains advisory structures alongside administrative decision-making. These decisions are instead made by ministries and administrative authorities.

At the organisational level, the arm's length principle therefore appears to be more visibly manifested in Denmark, Iceland, and Sweden than in Norway and, particularly, in Finland's minority-language news media subsidy scheme.

3.2 Dimension two: The decision-making process

A closely related analytical dimension to the structure and operational model of the decision-making organisation is the examination of the allocation and decision-making process. Here, it is equally important to study the extent to which the executive and legislative branches of government are involved in the decisions, ranging from the framing of guidelines to the preparation of decision-making materials.

3.2.1 Danish decisions made by a media board

The Danish Agency for Culture and Palaces provide secretariat support to the Media Board. This includes, inter alia, the preparation of cases for the Board and the submission of formal recommendations prior to decision-making. The final and legally binding decisions regarding the allocation of media support are taken by the Board itself.

Furthermore, the Act on Media Subsidies stipulates that support under the scheme may not be granted to news media outlets that are wholly or partially owned by public institutions, publicly funded entities, or comparable organisations. This rule does not apply to news media addressing the Danish minority in Southern Schleswig or the German minority in Southern Jutland (LOV nr 1604 af 26/12/2013; BEK nr 127 af 05/02/2024).

3.2.2 Dual decision-making structure in Finland

In Finland, as previously noted, the administration of subsidies is handled by different organisations. For the temporary distribution subsidy, Traficom organises a selection procedure concerning state aid for newspaper distribution, in which one distribution company is chosen for each subsidy-eligible area. These areas are defined by Traficom, which also sets the maximum price that the subsidised distribution company may charge newspaper publishers. Thus, the entire subsidy process is managed within the organisation (Traficom, 2025).

The other subsidy scheme, the one for news media published in the country's minority languages, is formally granted by the Finnish government in plenary session following a presentation by the Ministry of Education and Culture. Prior to the decision, the Ministry is required to consult both the Assembly of Swedish Finland (Folktinget) and the Sámi Parliament, in accordance with the applicable provisions governing the scheme. The administration of the subsidy is handled within the Ministry's department for cultural and arts policy. In this case, individual funding decisions are not taken as delegated civil servant decisions but are adopted at the level of government (FFS 389/2008).

While the Finnish State Aid Act (FFS 688/2001) does not explicitly prohibit the granting of subsidies to state-owned entities, all public support must comply with EU state aid rules. In the media sector, this generally precludes selective direct subsidies to state-owned media. The exclusion of state-owned media in Finland is therefore implicit and system-based, rather than explicitly stipulated in media subsidy legislation.

3.2.3 Iceland's allocation committee selects

The Icelandic Media Commission (Fjölmiðlanefnd) handles applications and provides expert support to the Allocation Committee under a separate agreement. The final decisions rest with the Committee.

The costs associated with the assessment of applications and other administrative expenses are met from the State Treasury (Lög um breytingu á lögum um fjölmiðla, nr. 38/2011 [stuðningur við einkarekna fjölmiðla]). As already mentioned, the subsidy is support for privately owned media.

3.2.4 Norwegian decisions made by a regulatory authority

For the Norwegian subsidy scheme, the Ministry for Culture and Equality makes a calculation of subsidies for each grant year, and in doing so determines the distribution between various categories by establishing subsidy rates and fixed amounts. These figures are based on the economic development of the industry and recommendations provided by the Media Authority (Medietilsynet, 2021: 164). Prior to a final decision, the

proposed distribution of the subsidy appropriation is submitted to the media industry's trade organisations for consultation. For the preparation of decisions concerning production subsidies, the Authority is supported by the dedicated advisory committees (Medietilsynet, 2021: 164).

Regarding the production subsidy, public institutions or public authorities may not exercise effective control, assume financial responsibility, or hold more than 49 per cent of the ownership shares in the company if support is to be granted (FOR-2022-12-08-2117). There is no explicit ownership prohibition with respect to the innovation subsidy (FOR-2018-06-26-1033).

3.2.5 Swedish decisions made by a council

The economic framework and expenditure ceilings of the Swedish news media subsidy scheme are determined by the state budget presented by the government. Applications for support are then processed by the Agency for the Media; as in Denmark, however, the formal and substantive decisions are taken by the Media Subsidy Council based on the documentation submitted to it. The Agency is also responsible, through its regulations on media subsidies, for clarifying how key requirements and stipulations are to be interpreted and applied (MEMYFS 2024:1, 2024).

In Sweden, media subsidy legislation explicitly excludes state-owned, municipal, and regional media, as well as public service companies, from eligibility for direct media support (SFS 2023:664).

3.2.6 Comparison of dimension two

Finland diverges from the other Nordic countries in that it operates a subsidy scheme targeted towards media that is administered entirely at the ministerial level, in this case by the Ministry of Education and Culture and the government. By contrast, in the case of the Finnish distribution subsidy and the Norwegian subsidy schemes, the entire preparatory and decision-making processes are located within individual administrative authorities (see Table 3.2).

Table 3.2 Decision-making process design (who prepares decisions, who decides, and where political steering is located)

Country	Preparation	Formal decision on individual grants	Location of framework steering
Denmark	Agency secretariat	Media Board	State budget + statutory/ordinance framework
Finland	Traficom and Ministry of Education and Culture (OKM)	Traficom and Government	State budget + decrees; scheme-specific steering varies
Iceland	Media Commission (administration)	Allocation Committee	State budget + statutory framework
Norway	Media Authority	Media Authority	Ministry sets system-level parameters (e.g., rates/categories)
Sweden	Agency for the Media	Media Subsidy Council	State budget + statute/ordinance; agency regulations clarify application

In Denmark, Iceland, and Sweden, the processes are more differentiated because of the institutional arrangement involving designated decision-making bodies within or close to the authorities. While applications are prepared by civil servants within the respective authorities, final funding decisions are taken by the decision-making councils rather than by the administrative staff. This suggests that the arm’s length principle appears more visibly present in this dimension within the Danish, Icelandic, and Swedish regulatory frameworks.

However, before proceeding to the third dimension, it is worth returning to the question of who, in practice, makes the decisions – and to the fact that perspectives on this matter may differ. As noted earlier, a discussion took place in Norway regarding the introduction of a media subsidy council at the turn of the 2010s and 2020s. One of the reasons why such a body was not established was a perceived risk of politicised decision-making. The concern expressed was that a council appointed by the ministry could open the door to increased political control. More specifically, it was argued that such a solution could make it possible for the minister to appoint individuals loyal to him or her to the subsidy council. The risk of media capture in the service of political interests was thus considered to increase (Bjerke & Halvorsen, 2023: 227).

3.3 Dimension three: The mechanisms of oversight

The final dimension to examine concerns the possibilities for oversight of the support systems and the decisions that follow from them. The aim is to study whether decisions can be appealed to a higher authority or reviewed by another authority, for example, a ministry or the government.

3.3.1 Final decisions in Denmark

In Denmark, the decisions of the Media Board cannot be referred to another administrative authority (LOV nr. 1604 af 26/12/2013). Consequently, decisions can only to a limited extent be appealed by those who consider them to be incorrect.

3.3.2 Media appeals board in Norway

In contrast to Denmark, decisions in Norway may be appealed to the Media Appeals Board (Medieklagenemnda), an independent adjudicatory body, appointed by the Ministry of Culture and Equality, which hears appeals in media-related cases (Medietilsynet, 2021: 164). It considers, for example, appeals against decisions adopted by the Media Authority under certain provisions of the broadcasting legislation, the legislation on media ownership transparency, and the rules governing the collective management of copyright (Klagenemndssekretariatet, 2026).

After an appeal to the Board, the case may, in principle, be brought before the courts as an action against the state. Moreover, the legislation clarifies that the King may not instruct or alter the decisions of either the Norwegian Media Authority or the Media Appeals Board (LOV-2020-12-18-153).

3.3.3 Review procedures in Finland

Regarding the two Finnish support schemes, decisions by state aid authorities may not be challenged through appeals. Rectification of a decision by a state aid authority may be sought only by an involved party, and the request must be addressed to the authority that adopted the decision. The decisions are thus subject to reconsideration through a rectification request, which subsequently allows the authority's rectification decision to be appealed before a court (FFS 688/2001).

3.3.4 Decisions stand in Iceland

As in Denmark, decisions of the Icelandic Allocation Committee under the Media Act are final at the administrative level (Lög um breytingu á lögum um fjölmiðla, nr. 38/2011 [stuðningur við einkarekna fjölmiðla]). The possibilities for appeal are therefore very limited.

3.3.5 Non-appealable decisions in Sweden

The situation in Sweden resembles that in Denmark and Iceland, and the legislation clearly states that decisions made by the Media Subsidy Council may not be appealed.

According to the applicable ordinance, decisions are not appealable under the ordinary administrative appeals procedure (SFS 2023:740).

3.3.6 Comparison of dimension three

The systems of monitoring and control differ in several respects across the Nordic countries. Norway is the only case in which a dedicated review and complaints body exists. In Finland, there is a clearly defined mechanism for reconsideration of state aid decisions; however, this body does not deal specifically with media subsidy schemes (see Table 3.3).

Table 3.3 Oversight and review mechanisms (administrative appeal, reconsideration, and judicial review)

Country	Administrative appeal available?	Reconsideration / rectification route	Dedicated media appeals body	Judicial review (in practice)
Denmark				Limited
Finland		Rectification, which can enable court appeal		After rectification
Iceland				Limited
Norway	Yes	Not central, appeal is primary route	Media Appeals Board	After appeal
Sweden				Limited

The institutional arrangements in Denmark, Iceland, and Sweden are largely similar, as all three systems contain explicit provisions stating that decisions on media subsidy are not subject to appeal. Consequently, administrative decisions in these countries are final and may only be reviewed by courts in exceptional circumstances, for instance, in relation to their compatibility with other areas of legislation.

In contrast, subsidy decisions in Finland and Norway may ultimately be subject to judicial review. In Finland, this occurs following the reconsideration procedure outlined above, while in Norway decisions may be challenged through judicial proceedings against the

state after an appeal to the Media Appeals Board.

Taken together, this suggests that the presence of the arm's length principle is more clearly reflected in the review mechanisms in Finland and, in particular, in Norway, where several layers of institutional protection are in place against potential political interference. In Denmark, Iceland, and Sweden, by contrast, the arm's length principle is formally upheld, but without corresponding judicial corrective mechanisms.

4. Autonomy in Nordic news media subsidy systems

Earlier sections in this report have examined the arm's length principle in the Nordic media support systems and offered a comparative discussion along three dimensions. The present section consolidates and further elaborates these comparisons and arguments.



Photo: Cecilie Ravik

We may begin by noting that the Nordic direct news media subsidy systems demonstrate that the arm's length principle constitutes both an explicit and implicit normative foundation across all Nordic countries. These subsidies are not primarily framed as instruments of industrial policy, but rather as democratic tools intended to safeguard media pluralism, journalistic quality, and public debate within the broader framework of the Nordic media welfare state.

At a general level, political responsibility is concentrated on the formulation of regulatory frameworks and budgetary allocations – rather than on individual funding decisions. In all five countries, the overall parameters of the subsidy systems are established through legislation, ordinances, and state budgets adopted at the political level, while individual allocation decisions are, to varying degrees, delegated to authorities, decision-making boards, or civil servants (apart from the Finnish minority-language subsidy). This reflects a shared understanding that direct political involvement in news media subsidy decisions is normatively problematic.

It should further be noted that, in comparison with earlier subsidy schemes, the contemporary system has often entailed that authorities and responsible councils are required to adjudicate on qualitatively different kinds of questions – for example, whether a newspaper covers “democratically relevant matters” for a “general audience” – rather

than applying more or less automatic criteria. The existing body of research nevertheless suggests that the ideal of autonomy remains operative and that, in such cases, practice does not contravene the fundamental premise of arm's length distance (Bjerke & Halvorsen, 2023: 263–264).

4.1 Comparing organisational models

Denmark, Iceland, and Sweden have established dedicated decision-making bodies that are formally separated from the day-to-day administration of the subsidy systems. This makes the arm's length principle institutionally visible. Nonetheless, an important distinction between the three countries lies in their eligibility rules: Sweden applies strict conflict-of-interest and eligibility requirements that exclude political actors, whereas the Danish and Icelandic framework contains no equivalent explicit restrictions. Such concerns are instead governed by the general disqualification rules of the Danish Public Administration Act and the Icelandic *Administrative Procedure Act*. Iceland's system of committee nominations by institutionally neutral bodies clearly reinforces this arm's length rationale.

In Finland and Norway, the subsidy schemes are primarily handled by administrative authorities. In Finland, one scheme stands out by being administered exclusively within a ministry. In the rest of the Finnish and Norwegian systems, the arm's length principle is less visibly institutionalised at the organisational level than in, for example, Denmark, but not necessarily weaker in practice.

Overall, a clear organisational separation may signal adherence to the arm's length principle. However, it is not in itself decisive for the degree of actual autonomy. The existence of a designated decision-making body does not automatically entail greater political insulation. This depends on how appointment procedures, eligibility criteria, and mandates are structured. The Norwegian debate on the proposed media subsidy council clearly illustrates this point. That said, from a purely organisational design perspective, the arm's length principle appears more visible in Denmark, Iceland, and Sweden than in Norway and Finland.

Upon closer examination, it is possible to observe that the political executive's appointing power over decision-making bodies is more or less present in all Nordic systems, as well as in the determination of financial frameworks.

4.2 Comparing decision-making processes

In Denmark, Iceland, and Sweden, decision-making follows a two-stage model in which civil servants prepare cases while specialised boards or councils adopt the formal decisions. This arrangement creates a distinct separation between political responsibility, administrative preparation, and final decision-making.

In Finland, particularly regarding minority-language subsidies, decisions are formally taken by the government or within ministries. The formal proximity to political authority is therefore greater, although this is partly mitigated by administrative routines and statutory consultation requirements. Decisions concerning the temporary distribution subsidy scheme are made by Traficom.

In Norway, the responsible ministry plays a somewhat more active role than in Denmark, Iceland, and Sweden. This involvement is, however, confined to system-level steering, such as setting financial frameworks and subsidy rates, rather than to individual allocation decisions. Individual subsidy decisions are taken within an administrative authority and are supported by advisory committees and external entities.

These differences illustrate that the arm's length principle is not realised solely through the identity of the decision-maker, but through the extent to which political steering is restricted to framework-setting and system-level governance.

The distinctions outlined on both the organisational and decision-making levels are, to a considerable degree, rooted in constitutional variations between the countries. In short, the West Nordic systems of Denmark, Iceland, and Norway feature a traditionally hierarchical organisation of administrative authorities under the relevant ministries, although there are examples of independent administrative bodies. By contrast, the East Nordic systems of Finland and Sweden are characterised by a long-standing constitutional tradition of organising state administration with a considerable degree of independence from the governmental level. This implies that governments and ministers in Denmark, Iceland, and Norway have broader opportunities to influence the activities and decision-making of individual authorities than in Finland and Sweden (Wenander, 2022).

The arm's length principle can thus, in a sense, be considered compensation for a different constitutional architecture: Where ministerial steering powers are structurally broader, stronger organisational insulation tends to be introduced.

4.3 Comparing mechanisms of oversight

Oversight and organisational insulation represent two different logics of arm's length protection. And a pronounced difference between the Nordic systems emerges at the level of review and legal control. Norway provides a dedicated appeals body and the possibility of judicial review, creating a multi-layered system of protection for the arm's length principle. Finland allows for reconsideration through rectification requests, followed by judicial review, offering a more indirect but nevertheless substantive form of legal oversight.

By contrast, Denmark, Iceland, and Sweden explicitly prohibit appeals against media subsidy decisions. As a result, decisions in these systems are effectively final, with only very limited scope for judicial scrutiny.

From one perspective, these three countries thus combine the most institutionally visible form of the arm's length principle at the organisational level, with comparatively limited judicial corrective mechanisms. Conversely, the absence of appeal procedures may, in some respects, also be interpreted as a means of shielding arm's length decisions from external interference. Norway and Finland, in turn, have opted for a model that relies on more formal safeguard mechanisms against political influence by allowing decisions to be reviewed by external bodies. At the same time, such arrangements may, according to critics, open possibilities for strategic litigation or procedural intervention driven by political and other interests.

5. Concluding remarks

This report has analysed how the arm's length principle is translated from a normative ideal into concrete institutional arrangements within Nordic news media subsidy systems. While the arm's length principle constitutes a shared normative reference across the region, it is operationalised in different institutional forms. Considering the five countries' differing institutional and constitutional arrangements, the report does not seek to rank the Nordic systems according to the degree of arm's length distance they embody, not least because several of the key differences between the countries stem from distinct legal traditions and administrative cultures. Moreover, without examining everyday administrative practice and the actual outcomes of the support schemes, it would be premature to argue that one model is inherently more fragile, or stronger, than another.

What can be stated with greater confidence, however, is that the principle is embedded in established administrative practices, legal traditions, and governance structures that shape how autonomy is institutionally configured in each case. Furthermore, the three analytical dimensions examined – organisational structures, decision-making processes, and oversight mechanisms – address different aspects of institutional independence and cannot be reduced to a single comparative scale.

Rather than forming a hierarchical continuum, the Nordic cases illustrate distinct configurations of formal distance, administrative professionalism, and legal safeguards. Taken together, the findings indicate that the arm's length principle operates less as a standardised regulatory model and more as an adaptable institutional framework, capable of being realised through different arrangements within broadly comparable democratic and media-political contexts.

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Media Policy at Different Distances: A Comparative Study of the Arm's Length Principle in Nordic News Media Subsidy Regulation

Tobias Lindberg

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