



Office for Democratic Institutions and Human Rights

# REPUBLIC OF FINLAND

## PARLIAMENTARY ELECTIONS

2 April 2023

### ODIHR NEEDS ASSESSMENT MISSION REPORT

25-27 January 2023



Warsaw  
16 March 2023

## TABLE OF CONTENTS

<b>I.</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>II.</b>	<b>EXECUTIVE SUMMARY .....</b>	<b>1</b>
<b>III.</b>	<b>FINDINGS.....</b>	<b>3</b>
A.	POLITICAL BACKGROUND .....	3
B.	ELECTORAL SYSTEM AND LEGAL FRAMEWORK .....	3
C.	ELECTION ADMINISTRATION .....	4
D.	VOTER REGISTRATION .....	5
E.	CANDIDATE REGISTRATION .....	5
F.	CAMPAIGN AND CAMPAIGN FINANCE .....	6
G.	MEDIA.....	7
H.	COMPLAINTS AND APPEALS .....	7
<b>IV.</b>	<b>CONCLUSIONS AND RECOMMENDATIONS.....</b>	<b>8</b>
	<b>ANNEX: LIST OF MEETINGS .....</b>	<b>9</b>

**REPUBLIC OF FINLAND**  
**PARLIAMENTARY ELECTIONS**  
**2 April 2023**

**ODIHR Needs Assessment Mission Report**

**I. INTRODUCTION**

Following an invitation from the authorities of Finland to observe the 2 April 2023 parliamentary elections and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 25 to 27 January. The NAM was composed of Ana Rusu, ODIHR Senior Election Adviser, and Hamadziripi Munyikwa, ODIHR Election Adviser.

The purpose of the mission was to assess the pre-election environment and preparations for the parliamentary elections. Based on this assessment, the NAM recommends whether to deploy an ODIHR election-related activity for the forthcoming elections, and if so, what type of activity best meets the identified needs. Meetings were held with officials from the Ministry of Foreign Affairs, Ministry of Justice, the Supreme Administrative Court, the National Audit Office, the Digital and Population Data Services Agency, and the Council for Mass Media, as well as with representatives of political parties, media, and civil society. A list of meetings is included as an annex to this report.

ODIHR would like to thank the Ministry of Foreign Affairs for its assistance and co-operation in organizing the NAM. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and to share their views.

**II. EXECUTIVE SUMMARY**

On 2 April, voters will elect all 200 members of parliament, from 13 electoral districts, for a 4-year term, through an open list proportional representation system. Voters cast a ballot for a single candidate and seats are allocated through the d'Hont method with no legal threshold for the allocation of seats in parliament.

Parliamentary elections are primarily regulated by the Constitution and the Election Act. Separate amendments were made to the Elections Act in 2022 to regulate elections for newly instituted county representatives, to permit Constituency Election Committees (CECs) to begin counting advance votes two hours earlier than before on election day, and to organise voting in military garrisons. All ODIHR NAM interlocutors expressed confidence in the electoral legal framework and its implementation.

The Ministry of Justice (MoJ) oversees the organization of elections and is responsible for issuing regulations and guidance to subordinate levels of the election administration, maintaining the register of political parties and the Election Data System (EDS), determining the elections budget and overseeing the printing of election material. In all, voting on election day will take place at close to 2000 polling stations with 900 polling stations operating for advance voting and approximately 200 polling stations in Finnish embassies and consulates abroad. The MoJ produces materials with voter information in Braille, sign language and easy-to-understand language to facilitate voting for persons with disabilities. All ODIHR NAM interlocutors expressed a high level of confidence in the integrity and impartiality of the election administration.

Citizens over 18 years of age are entitled to vote. Voter registration is passive and voter information is extracted from the Population Information System (POIS) maintained by the Digital and Population Data Services Agency (DPDSA). The voter list is publicly available 41 days ahead of elections and

individual voters can request corrections to their data up to 16 days in advance of the election. Approximately 4.5 million citizens are registered to vote for these elections. ODIHR NAM interlocutors expressed full confidence in the voter list and the population and voter registration systems.

Candidates are nominated by political parties which are registered with the MoJ, and by constituency associations which have collected the signatures of at least 100 voters as required for parliamentary elections. Although there are no legal quotas, many parties apply internal policies to promote women, youth and minority candidates. Of the membership in the outgoing parliament, 45 per cent are women, as are the prime minister, all the leaders of the coalition parties and 12 of the 19 outgoing members of the cabinet. All political parties met with by the ODIHR NAM expressed full confidence in the inclusiveness of the candidate registration process.

The legislation does not limit campaigning to an official timeframe. All political parties that the ODIHR NAM met with noted their intention to campaign actively, including online and through social media, as well as to participate in debates organized by the public broadcaster. The main campaign topics are likely to be inflation, energy costs, climate change and Finland's application to join the North Atlantic Treaty Organization (NATO).

Political parties are eligible for public funding in proportion to the number of parliamentary seats they hold following the most recent elections. In addition to the funding provided by the parties, election campaign activities can be funded from a candidates' own resources, as well as loans and contributions received from individuals and legal entities. Parties are permitted to receive funding from foreign individuals and associations which share the same political ideology. There are no mandatory requirements for interim reporting, though contestants may choose to voluntarily disclose their funding ahead of the election. Candidates elected to parliament must submit reports on campaign income and expenditure to the National Audit Office (NAO), which is tasked with the oversight of political party and campaign finance. Most of ODIHR NAM interlocutors were satisfied with the current campaign finance legislation, although some pointed out the need to strengthen NAO sanctioning powers and improve the regulation on donations by third parties.

The media landscape is pluralistic and provides access to a diverse range of views through a variety of outlets. The public broadcaster, YLE (*Yleisradio*) plans to organize a number of electoral programmes to give all contestants equitable conditions to present their platforms, as well as television debates with the participation of parliamentary and non-parliamentary parties. The self-regulatory organ for the media, the Council for Mass Media considers complaints on breaches of professional ethics and promotes good journalistic practice and freedom of speech. All ODIHR NAM interlocutors expressed confidence in the impartiality of the public broadcaster, as well as the overall professionalism of private media.

The Election Act provides expedited recourse for complaints related to the registration of voters, election results and decisions pertaining to the delimitation of voting districts by the Supreme Administrative Court (SAC). Other election-related complaints such as those related to candidate registration or the composition of electoral commissions are without mandatory deadlines, potentially limiting the opportunity for effective remedy before the end of an electoral process. All ODIHR NAM interlocutors expressed full confidence in the judiciary noting that there are generally very few election-related complaints submitted to the SAC.

Most ODIHR NAM interlocutors expressed a high level of confidence in all aspects of the electoral process. The ODIHR NAM did not identify any new issues pertaining to the conduct of elections that would benefit from a review by an election observation activity. Based on this assessment, the

ODIHR NAM does not recommend deploying an election-related activity for the 2 April parliamentary elections. ODIHR stands ready to engage in a follow-up process after the elections to address previous ODIHR recommendations, and encourages the authorities to also consider issues raised by interlocutors during the course of the ODIHR NAM, including with regard to improving the oversight of campaign finance.

### III. FINDINGS

#### A. POLITICAL BACKGROUND

Legislative power in the Republic of Finland is vested in a 200-member unicameral parliament (*Eduskunta*), with a prime minister serving as the head of the government and a directly elected president acting as head of state. The parliament enacts laws, decides on the state budget, supervises the activities of authorities subordinated to the government, and adopts international agreements. The parliament also elects the prime minister who is officially appointed by the president. The prime minister nominates other members of the government who are appointed by the president while the president appoints judges and exercises powers in foreign affairs and national defense.

The most recent elections were for the 21 newly-established county councils, held on 23 January 2022. Parliamentary elections were last held on 14 April 2019 and resulted in eight parties winning seats in parliament with no individual party having garnered more than 20 per cent of the available seats.<sup>1</sup> The Social Democratic Party, Left Alliance, Center Party, Green League, and the Swedish People's Party of Finland formed the government.<sup>2</sup> The outgoing parliament includes 91 women (45 per cent of the membership). The prime minister, all the leaders of the coalition parties and 12 of the 19 outgoing members of cabinet are women.

ODIHR deployed a Needs Assessment Mission ahead of the 14 April 2019 parliamentary elections. The NAM found that all interlocutors expressed a high level of confidence in all of the aspects of the electoral process and that no new issues pertaining to the conduct of elections that would have benefitted from a review by ODIHR had been identified since the last observation activity. Based on that assessment ODIHR did not recommend deploying an election-related activity.<sup>3</sup>

These elections will take place in the context of Finland's application to join the North Atlantic Treaty Organization (NATO) in May 2022. Other important background political factors expected to influence the campaign include increased energy costs, inflation and climate change.

#### B. ELECTORAL SYSTEM AND LEGAL FRAMEWORK

The 200 members of parliament are elected for four-year terms through an open list proportional representation system, in which voters cast a ballot for a single candidate, in 12 multi-member districts and one single-member district.<sup>4</sup> Seats are allocated through the d'Hondt method and there

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<sup>1</sup> Eight parties at the time of elections in 2019 - The Social Democratic Party won 40 seats, the Finns Party - 39, National Coalition Party - 38, Center Party -31, Green League - 20, Left Alliance - 16, Swedish People's Party - 9, Christian Democrats - 5, Movement Now and the Åland Coalition both received 1 seat.

<sup>2</sup> In December 2019 the Centre party voiced a lack of confidence in Antti Rinne the leader of the SDP in December 2019 over his handling of a postal strike, resulting in Sanna Marin

<sup>3</sup> See [all previous ODIHR reports on Finland](#).

<sup>4</sup> Helsinki electoral district has 22 members of parliament, Uusimaa – 36, Varsinais-Suomi – 17, Satakunta – 8, Häme – 14, Pirkanmaa – 19, Southeast – 17, Savo-Karelia – 15, Vaasa – 16, Central Finland – 10, Oulu – 18, Lapland – 7, and Åland – 1. The Åland Islands have a special constitutional status, regulated by the Act on the Autonomy of the Åland Islands.

is no legal threshold parties must attain in order to gain seats. Ahead of each regular election, the State Council determines the number of seats in each district in proportion to the number of voters, based on the data obtained from the Population Information System (POIS), which is administered by the Digital and Population Data Services Agency (DPDSA).<sup>5</sup>

Parliamentary elections are primarily regulated by the Constitution (2000) and the Election Act (1998). Separate amendments were made to Elections Act was in 2022, to regulate elections for newly instituted county representatives, and to permit Constituency Election Committees (CECs) to begin counting advance votes on election day, two hours ahead of the close of polls, as well as to organise voting in military garrisons. The Act on Candidate's Election Funding (2009) and the Act on Political Parties (1969) regulate party financing and the disclosure and reporting of campaign finances and also include provisions for equal coverage of political parties in the media. Provisions of the Criminal Code include sanctions for election-related violations such as fraudulent voting or the falsification of election results. The Ministry of Justice (MoJ) issues guidelines, decisions and instructions to further regulate the conduct of the elections. Finland is a party to major international and regional instruments related to democratic elections.<sup>6</sup> All ODIHR NAM interlocutors expressed confidence in the legal framework for elections.

A few previous ODIHR recommendations remain unaddressed, including those related to timelines for lodging and adjudicating election related complaints and the restrictions on the right to stand in elections for individuals holding military office.

### C. ELECTION ADMINISTRATION

The MoJ is responsible for issuing regulations and guidance to subordinate levels of the election administration, maintaining the register of political parties and the Election Data System (EDS), determining the elections budget and overseeing the printing of election material. The MoJ is also responsible for informing voters on important election dates and procedures, which it does via social media, videos on television and by distributing brochures.

The 13 CECs, 21 newly-established County Election Boards (CEBs) and 317 Municipal Central Election Committees (MCECs) are respectively composed of a chairperson, a deputy chair, and three members representing the political parties with the most seats in the corresponding electoral constituencies and county or municipal councils. The CECs are mainly responsible for candidate registration and counting. MCECs are permanent bodies serving four-year terms and are responsible for most of the logistical preparations for elections. In all, voting on election day will take place at close to 2000 polling stations with 900 polling stations operating for advance voting and approximately 200 polling stations in Finnish embassies and consulates abroad. All ODIHR NAM interlocutors expressed full trust in the integrity and impartiality in the work of the election administration at all levels.

While there are no specific legal requirements for gender representation in the election administration structures, the 1986 Act on Equality between Women and Men requires the representation of at least 40 per cent of either sex in all public institutions. In addition to voting on election day, voters can

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<sup>5</sup> The apportionment of seats to respective constituencies for these elections was completed in October 2022.

<sup>6</sup> Including the 1950 European Convention on Human Rights, 1966 International Covenant on Civil and Political Rights, 1965 International Convention on the Elimination of All Forms of Racial Discrimination, 1979 Convention on the Elimination of All Forms of Discrimination against Women, 1990 International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families, 1995 EU Framework Convention for the Protection of National Minorities, 2003 UN Convention against Corruption, and 2006 Convention on the Rights of Persons with Disabilities. Finland is also a member of the Council of Europe's Venice Commission and Group of States against Corruption (GRECO).

cast their ballots at advance polling stations, at home and in military garrisons and prisons. Voters abroad can vote by post, and in-person at Finnish embassies or on Finnish merchant shipping vessels. Voters could request postal ballots starting from 2 January and will be able to receive and return their ballots beginning 2 March. The deadline for receipt of postal ballots by the MCEC will be 31 March. Advance voting will take place between 22 and 28 March in Finland and 22 and 25 March at embassies and consulates abroad.

Election legislation provides for special provisions to support the participation of voters with disabilities, such as transportation and specially designed polling stations. In co-operation with civil society organizations, the MoJ produces information on candidates in accessible formats for persons with disabilities. In addition, the MoJ produces materials with voter information in Braille, sign language and easy-to-understand language, targeting voters unfamiliar with elections or those with intellectual disabilities.

#### **D. VOTER REGISTRATION**

Citizens who have reached 18 years of age by election day have the right to vote. Approximately 4.5 million citizens are eligible to vote for these elections. Voter registration is passive and voter information is extracted from the Population Information System (POIS) 46 days ahead of the election.

The register is made available for inspection 41 days ahead of the election. Each voter receives a notification, either by post or electronically that includes their registration information and their designated polling station, 24 days before election day. Voters can check their information with their MCECs and can request corrections, which must be received at least 16 days prior to the election. Decisions can be appealed to provincial administrative courts and the Supreme Administrative Court; its decisions are final. The voter register becomes legally valid 12 days before election day, and amendments after this deadline are only permissible based on a Supreme Administrative Court decision with the DPDSA notified of any such decision in order to ensure timely updates in the system. All ODIHR NAM interlocutors expressed full confidence in the voter list and trust in the accuracy of the voter register.

#### **E. CANDIDATE REGISTRATION**

All citizens holding the right to vote can stand for parliamentary elections, with the exception of those who are under guardianship and those who hold military office. Some categories of officials may stand as candidates but are required to resign from their office before being appointed as MPs.<sup>7</sup>

Candidates are nominated by political parties or by constituency associations, with at least 100 signatures as required for parliamentary elections.<sup>8</sup> Political parties may form coalitions ahead of elections. Candidates can only stand in a single constituency. There are no requirements that the candidate be resident in the constituency in which they are standing. While there are no legal requirements for gender representation on candidate lists, most political parties which the ODIHR NAM met with indicated that they have internal policies to ensure equality for women and men as candidates as well as to put forward young and minority candidates.

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<sup>7</sup> These include the Chancellor of Justice of the Government, the Parliamentary Ombudsman, a Justice of the Supreme Court or the Supreme Administrative Court, and the Prosecutor-General.

<sup>8</sup> Political parties are registered by the MoJ upon submission of at least 5,000 support signatures from eligible voters. Parties which fail to win seats in two consecutive parliamentary elections or gain less than two per cent of the votes across all constituencies are de-registered but may re-apply for registration at any time. There are currently [24 parties registered with the MoJ](#).

Political parties and constituency associations are required to submit their candidate lists to the respective CEC 40 days before the elections. The CECs review the lists and randomly assign candidate numbers 31 days before the elections. All parliamentary political parties expressed confidence in the process for registering candidates.

## F. CAMPAIGN AND CAMPAIGN FINANCE

National legislation does not limit campaigning to an official timeframe and there are no provisions on how candidates and parties' may campaign. All ODIHR NAM interlocutors from the political parties noted that parties intend to campaign online and through social media, as well as participating in the debates organized by the public broadcaster. Some political parties will use campaign advertisements in print media, as well as leaflets, posters and billboards. According to ODIHR NAM interlocutors, the campaign will likely focus on inflation, energy costs, and issues related to climate change and Finland's NATO candidacy.

Campaign finance is regulated by the Act on Candidate's Election Funding and the Act on Political Parties.<sup>9</sup> The National Audit office (NAO) is tasked with oversight of political party and campaign financing. All parties represented in the parliament are eligible for public funding in proportion to the number of seats garnered in the most recent elections. In addition to the funding provided by the parties, candidates can fund their own campaigns, take out loans and receive contributions from individuals and legal entities. The Act on Political Parties states that parties may accept foreign campaign contributions from private individuals or from international associations as well as from foundations that promote the same ideology as the candidate.

Contributions from a single donor for parliamentary elections are capped at EUR 6,000 to a candidate and EUR 30,000 to a political party. Anonymous donations are prohibited but, there is no obligation to disclose the source of contributions under EUR 1,500. Campaign finance legislation does not envisage limits on campaign spending, nor does it impose an obligation on contestants to open a dedicated bank account for all campaign incomes and expenditures. Campaigning by third parties is not regulated and some ODIHR NAM interlocutors expressed the need to improve the regulation on donations by third parties.

Contestants are not obliged to disclose financing ahead of the elections, though most candidates and parties do so voluntarily, and the information is published online. All political parties and candidates elected to parliament are obliged to submit detailed financial reports to the NAO, two months after the elections, covering contributions and spending for the period six months leading up to the elections and two weeks after election day as well as their annual reporting on their regular financial activities. The NAO is vested with sanctioning powers where the necessary documents or information are not submitted, corrected or completed. The NAO publishes all financial reports online and reports to the parliament on the audits of the campaign reports within eight months and on the reports for the regular financial activities of the parties annually.<sup>10</sup> Some ODIHR NAM interlocutors expressed the need for strengthening NAO sanctioning powers.

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<sup>9</sup> Both these laws were last amended in 2010. Changes included the introduction of reporting on campaign contributions and expenditures and the ban on anonymous donations. The Council of Europe's Group of States against Corruption (GRECO)' Evaluation Report (2017) notes that "Finland has shown remarkable progress...it has now in place a new legal framework which aims at providing transparency of financing of election candidates, political parties as well as other entities linked to political parties." See [GRECO Reports on Finland](#).

<sup>10</sup> According to the NAO some 40 to 50 political entities are audited annually.



## G. MEDIA

The media landscape is pluralistic with many public as well as private broadcast and print media providing access to a diverse range of views. The circulation of print media has been in decline but most media outlets have their own online platforms.<sup>11</sup> The public broadcaster, YLE (*Yleisradio*), with its four national television channels and regional network of channels broadcasting in Finnish, Swedish and Sami languages, plays an important role in providing political information to all voters. The traditional media landscape is also dominated by a number of private nationwide television channels.

There are no legal regulations on the media coverage during the election campaign and media are largely self-regulated. The YLE's operations are governed by the Act on the Public Broadcaster which requires the public broadcaster to "support democracy and everyone's opportunity to participate by providing a wide variety of information, opinions and debates as well as opportunities to interact" and specifically concerning the parliamentary elections by the Act on Political Parties, according to which "state institutions should treat all parties equally." When applying the Act on Political Parties to election programmes, YLE may also take into account journalistic aspects. YLE plans to organize a number of electoral programmes including multiple debates with both parliamentary and non-parliamentary parties and discussion shows in a number of languages.<sup>12</sup> All ODIHR NAM interlocutors expressed overall confidence in the impartiality of the public broadcaster as well as the overall professionalism of private media.

The Council for Mass Media is a self-regulating independent body, which promotes good journalistic practice and considers complaints on breaches of professional ethics. It is comprised of a chairperson and 13 members appointed for a three-year term. The Council is tasked with interpreting and promoting good professional practices and defending freedom of speech. It also develops guidelines for journalists with the aim of supporting the responsible use of freedom of speech in mass communication, including online outlets.<sup>13</sup> The Council's decisions are published on its website, including the complete decision if a complaint is upheld.

## H. COMPLAINTS AND APPEALS

The Election Act provides expedited recourse for complaints related to the registration of voters, election results and decisions regarding the delimitation of voting districts. Other election-related complaints are dealt with under the Administrative Judicial Procedure Act which does not stipulate strict deadlines for certain parts of the electoral process, such as candidate registration or the composition of electoral commissions, and thus may not provide timely and effective remedy before the end of an electoral process. According to the law, an administrative decision may be appealed to the Administrative Court and further to Supreme Administrative Court whose decisions are final. ODIHR NAM interlocutors noted that there are generally very few election-related complaints submitted to courts. The right to appeal against the final results of parliamentary and local elections is open to all eligible voters. Appeals must be submitted to the regional administrative courts no later than 14 days after the publication of the results. The decisions of the provincial administrative courts can be further appealed to the Supreme Administrative Court. All ODIHR NAM interlocutors expressed full confidence in the work of the judiciary.

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<sup>11</sup> See 2021 [statics for the relative size](#) of various segments of the media market

<sup>12</sup> According to YLE some 45 hours of election-related programs will be broadcast during the campaign covering special interests of minority groups including in English, Russian, Sami, Romani, Ukrainian and Arabic languages.

<sup>13</sup> [Guidelines](#) came into force on 1 January, 2014.

#### **IV. CONCLUSIONS AND RECOMMENDATIONS**

Most ODIHR NAM interlocutors expressed a high level of confidence in all aspects of the electoral process. The ODIHR NAM did not identify any new issues pertaining to the conduct of elections that would benefit from a review by an election observation activity. Based on this assessment, the ODIHR NAM does not recommend deploying an election-related activity for the 2 April parliamentary elections. ODIHR stands ready to engage in a follow-up process after the elections to address previous ODIHR recommendations, and encourages the authorities to also consider issues raised by interlocutors during the course of the ODIHR NAM, including with regard to improving the oversight of campaign finance.

## **ANNEX: LIST OF MEETINGS**

### **Ministry for Foreign Affairs**

Markus Teir, Deputy Director, Unit for Security Policy and Crisis Management  
Riitta Puukka, Department for Consular Affairs  
Tia Puumalainen, Department for Consular Affairs  
Tiina Väänänen, Department for Consular Affairs  
Leena Saarikoski, Unit for Security Policy and Crisis Management

### **Ministry of Justice**

Niklas Wilhelmsson, Director of Unit for Democracy and Elections,  
Arto Jääskeläinen, Director of Electoral Administration  
Oula-Antti Labba, Senior Specialist, Unit for Democracy and Elections  
Laura Nurminen, Senior Specialist  
Elina Siljamäki, Senior Specialist  
Tuomas Rekola, Specialist

### **The Supreme Administrative Court**

Kari Kuusiniemi, President of the Supreme Administrative Court  
Anne E. Niemi, Justice

### **National Audit Office**

Jonna Carlson, Oversight Manager  
Pontus Londen, Principal Financial Auditor

### **Digital and Population Data Services Agency**

Timo Salovaara, Deputy Director General

### **Political Parties**

Vilhelm Junnila, Chairperson of the Delegation of Finland to the OSCE PA, Member of Parliament, the Finns Party  
Anna-Mari Vimpari, Secretary General, Center Party of Finland  
Jari Haapiainen, EU, Foreign and Defence policy expert, Center Party of Finland  
Elsi Juupaluoma, Party Secretary, Christian Democrats  
Anna Mäkipää, Party Secretary, Left Alliance  
Karoliina Kähönen, Secretary General, Movement Now  
Teppana Euro, Secretary General, Power Belongs to the People  
Antton Rönholm, Party Secretary, Social Democratic Party  
Fredrik Guseff, Party Secretary, Swedish People's Party of Finland  
Kristiina Kokko, Party Secretary, National Coalition Party  
Matilda af Hällström, EU and Foreign policy expert, National Coalition Party  
Elias Laitinen, Administrative Secretary, Left Alliance

### **Council for Mass Media**

Eero Hyvönen, Chairperson

### **The Finnish Broadcasting Company YLE (Yleisradio)**

Petri Kejonen, Head Producer, Elections  
Mika Ojamies, Director of International Relations  
Ville Laakso, Producer of Elections Results  
Timo Huovinen, Ethics Chief

### **Transparency International Finland**

Ilkka Penttinen, Chairperson  
Anna Laitinen