

MONITORING MEDIA PLURALISM IN THE EUROPEAN UNION

Results of the MPM2026
Country report: Belgium

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REPORT JUNE 2026

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1. Note from the MPM team

The *Media Pluralism Monitor 2026* uses a six-tier risk scale as follows:

- Very low risk (Rounded score comprised between 0 % and 16% included) - represented in green
- Low risk (Rounded score comprised between 17% and 33% included) - represented in light green
- Medium-low risk (Rounded score comprised between 34 % and 50% included) - represented in yellow
- Medium-high risk (Rounded score comprised between 51% and 66% included) - represented in orange
- High risk (Rounded score comprised between 67% and 83% included) - represented in red
- Very high risk (Rounded score comprised between 84% and 100% included) - represented in bordeaux

The six-tier system has been used since the MPM 2025, in replacement of a three-tier scale (low risk to high risk) to provide a more granular assessment of the risk to media pluralism and freedom. This increased granularity also aimed at shifting from percentage-based risk reporting to risk-band reporting, that allows more comparability over the years, giving the constant changes of the MPM questionnaire.

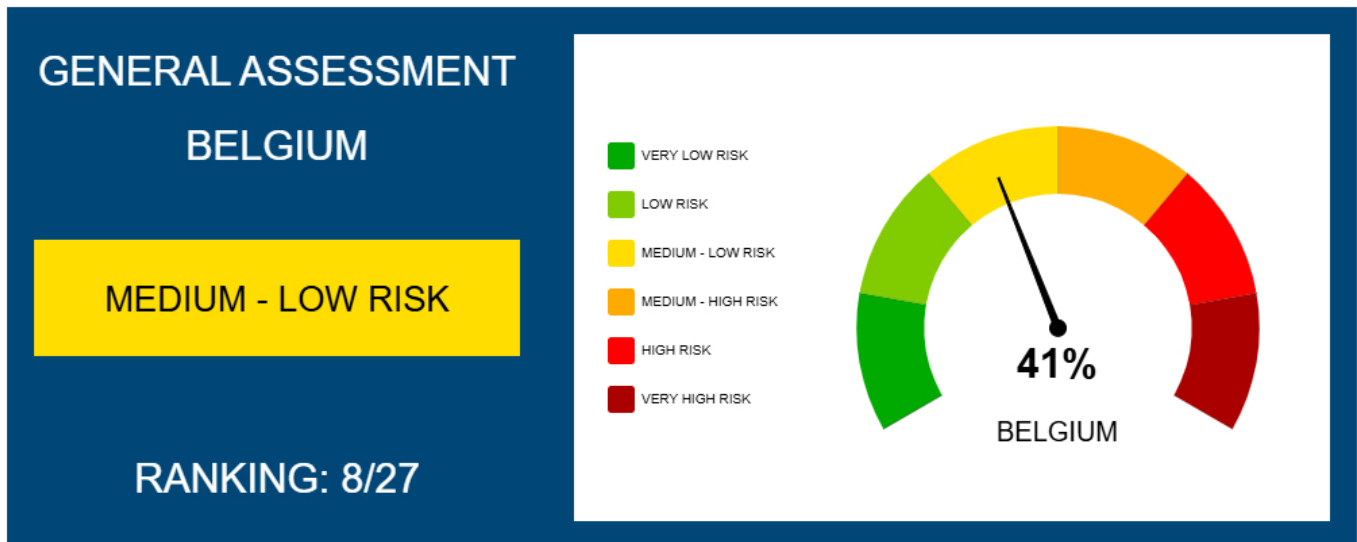
The structure of the MPM report is composed of two parts as follows:

- **Results snapshot** - provides an executive summary of the risks to media pluralism and freedom in the country studied.
- **In-depth results** - provides a more detailed overview of the MPM results per area, including some specific recommendations for each country.

For specific changes in the questionnaire, please refer to Part 6 - *MPM Methodology*.

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire considering the evolution of the information and media sphere, the existence of newly available data, and based on the regular evaluation of the tool after its implementation. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Results snapshot



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Country Overview

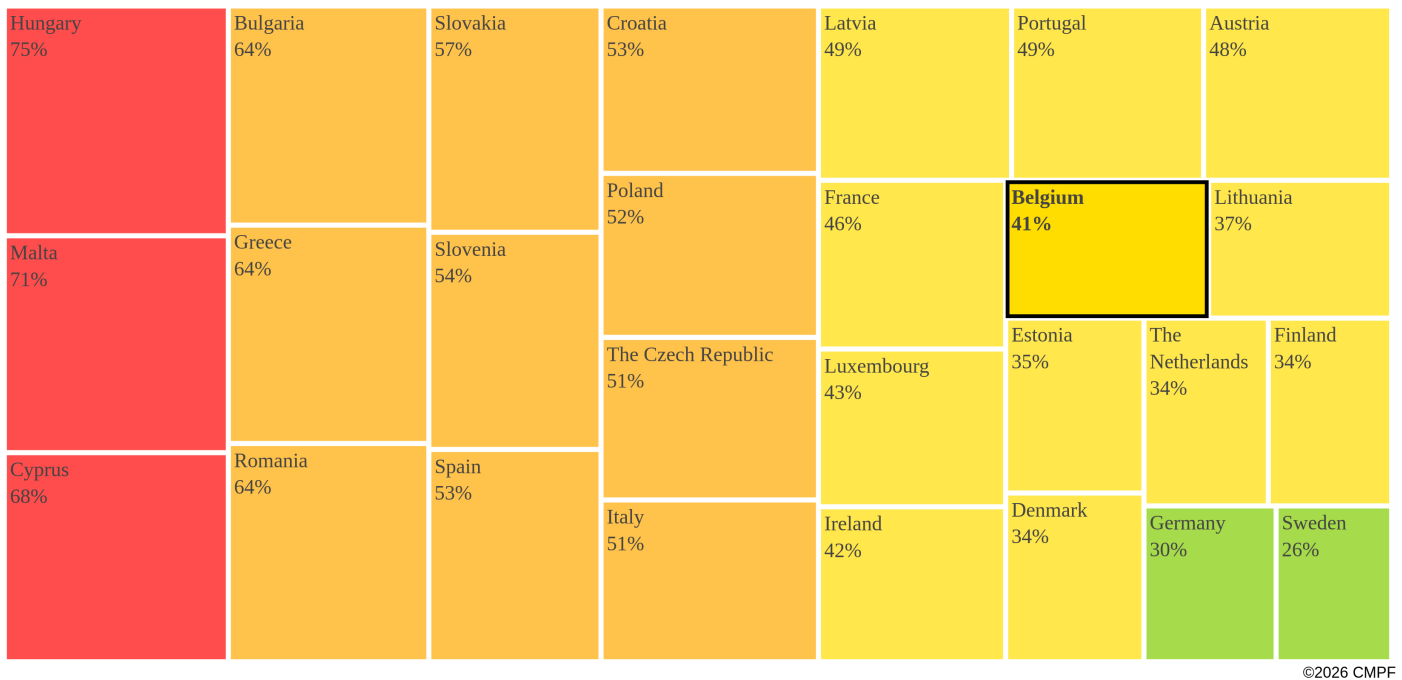
Belgium is a federal state and is structured along regional and linguistic lines, resulting in three linguistic Communities: Flemish, French and German-speaking.^[1] Since 1970, successive state reforms have given the Community governments more powers to regulate the audiovisual media markets. This has resulted in separate (audiovisual) media laws and separate media regulators, with sometimes varying tasks and competences. For example, the regulator of the French Community, the *Conseil Supérieur de l'Audiovisuel* (CSA), monitors concentration indices and can take regulatory action if it concludes that the media market in the French Community is becoming too concentrated, whereas the *Vlaamse Regulator voor de Media* (VRM) of the Flemish Community has the power to 'map' media concentration and publish annual reports about the state of media markets.

A consequence of the linguistic diversity is the economic reality of two separate media markets: the north of Belgium has a predominantly Flemish-speaking population, whereas the south of Belgium has a predominantly French-speaking population. This division results in small media markets compared to neighbouring countries like France, Germany, or the Netherlands. Both markets are highly concentrated, with only a handful of companies on each side. Recent years have witnessed a growing consolidation between media actors (within and across sectors). DPG Media is the only media company that operates in all media sectors: television, radio, print and online. Both Mediahuis and DPG's activities are not confined to Belgium. The Belgian public also has access to a broad range of foreign media outlets, both print publications and audiovisual media which are available via cable, satellite and via the internet. Especially the French-speaking part of the country, TV channels from neighbouring countries are very popular, in particular the channels from the French public service broadcasting organisation and from the TF1 Group.

Media companies DPG Media and Mediahuis have plans to pay a part of their journalists' wages in copyright royalties as of 2026. Although this at first sight might improve their income, the Flemish journalist association VVJ objects to this way of working, because of legal uncertainty surrounding copyright regulations and hollowing social protection^[2].

In 2025, there were no significant developments in terms of new media legislation or policy. In both the

Flemish and the French speaking Community, proposals to adjust the existing media legislation^[3] in order to comply with EMFA have been introduced, but they have not been approved yet. At the federal level, a law proposal for anti-SLAPP was introduced, but it has not been promulgated yet.



FUNDAMENTAL PROTECTION **LOW RISK**

The **Fundamental Protection** area scores within the low risk band. Key points include:

- Despite a strong recognition of freedom of expression, Belgium keeps struggling with the lack of a clear legal framework of a priori restrictions ('preventieve censuur'). In the past, Belgium has been condemned by the ECtHR because of this lacking framework. The Court was of the opinion that the legislative framework, together with the case-law of the Belgian courts, did not fulfil the condition of foreseeability required by the Convention. As the interference complained of could not be considered to be prescribed by law, there had thus been a violation of Article 10 of the Convention. Despite this conviction, there are still cases where courts do not follow this case law. For instance, a journalist intended to publish an article about a judicial investigation into a local politician for tax fraud. The Court of first instance ruled in favour of the politician, but in June 2025 the Court of Appeal in Liège confirmed that a priori restrictions are not allowed.
- At the beginning of 2025, a federal law proposal with regards to SLAPPs was introduced but it has not yet passed into legislation.
- Initiatives to tackle disinformation are numerous but a national policy to tackle the issue is not available. This could be attributed to the federal structure of the country.
- As in the previous implementations rounds, the financial situation of freelancers remains unstable in

comparison with journalists who are employed as employees.

- Violence against journalists, both online and offline, is still an issue in 2025. This includes physical attacks, verbal assaults, and online harassment, which indicates a persistent challenge to press freedom.
- The Federal Institute for Human Rights (FIRM) has published its first report on the whistleblower protection law of 2022. The FIRM notes a strong progress but recommends for instance to simplify the rules as they are too complex and to harmonise existing legislation.

MARKET PLURALITY

HIGH RISK

The **Market Plurality** area scores within the high risk band. Key points include:

- Both on the Flemish and the French speaking side, the media market remains highly concentrated. In its yearly report, the Flemish media regulator again designates PSM VRT and commercial media companies DPG Media and Play media as the leaders in the Flemish television market. The same applies to the other media sectors: PSM VRT, DPG Media and Mediahuis for radio and DPG Media, Mediahuis and Roularta for the written press ^[4].
- On the French speaking side, there are commercial company RTL (owned by DPG Media and Rossel), PSM RTBF, and French commercial company TF1 for television. For the radio market, there are RTL Belgium, PSM RTBF, IPM et NRJ Group. Finally, the written press only has two main actors: Groupe Rossel and IPM. The latter have announced their merger in the summer of 2025 ^[5]. However, the merger is pending due to the investigation by the Belgian Competition Authority. If it would be approved, only one media company would own almost all the titles of the daily press in the French speaking part of the country.
- Rules concerning the disclosure of media owners remain restricted to licensed, audiovisual media. On the Flemish side, the yearly concentration report of the Flemish media regulator gives some insight in the ownership of media companies, but it is not fully transparent as prescribed by EMFA. Similar rules for the press or online media do not exist.
- Apart from some restrictions on the accumulation of radio or TV licenses, regional media laws do not contain specific thresholds or procedures for (cross-)media mergers, mainly caused by the division of powers in Belgium between the federal state and communities. General merger control rules also apply to the media sector. The Belgian Competition Authority occasionally attaches conditions to a merger with the goal of ensuring diversity of media content, but this has not prevented the current high level of concentration.
- There is a lack of social protection for journalists and editors accounting for the risks associated with the profession (i.e. failing to protect against undue commercial influences or conflict of interests with management or boards, other than through traditional 'soft' regulation such as self-regulatory statutes and deontology). On a positive note, regulation of advertising may be considered well-implemented and effective.

- Belgium transposed Directive (EU) 2019/790 of 17 April 2019 on copyright and related rights in the Digital Single Market but went further than what the EU prescribed. However, this act was challenged by Meta (Facebook), Google and others before the Constitutional Court, which referred 13 questions to the Court of Justice of the European Union (CJEU) for a preliminary ruling in an annulment action. The case is still pending.

POLITICAL INDEPENDENCE

LOW RISK

The **Political Independence** area scores within the low risk band. Key points include:

- No regulation prevents politicians (either in government or not) to own shares in media. An explicit provision that the board of directors cannot have someone with a political mandate is foreseen only for the radio sector in Flanders. Respective community regulation FIRTA and FrAMSA provide some other safeguards in terms of independence from the government, parties, and other entities, however they only exist for the broadcasting sector (radio and television), in contrast to newspapers and media distribution (leaving aside the general constitutional protection of freedom of expression and press freedoms, and self-regulatory codes of ethics for journalists).
- There is a lack of transparency of (online) political advertising during campaigning as there is no specific regulation obliging parties or intermediaries to be transparent to authorities on whether these campaigns are run fairly and by use of which techniques.
- There is no specific legislation governing the distribution of state advertising to media outlets and online platforms, and no public body is responsible for monitoring or reporting annually on state advertising distribution.
- Some concern have emerged in terms of funding in the PSM sphere.
- Reduced support for newspapers delivery is reportedly having a negative impact, according to media sources.
- With regards to adapting media legislation in light of the transparency and targeting of political advertising, in both parts of the country, proposals have been drafted to change the existing media legislation (which designates the media regulators as supervising authorities). However, these proposals are still pending approval.

SOCIAL INCLUSIVENESS

MEDIUM-LOW RISK

The **Social Inclusiveness** area scores within the medium-low risk band. Key points include:

- The different language communities have difficulty defining clear categories of minorities due to politically sensitive language legislation. French and Dutch speakers form a minority in some parts of

the country but not in others, so that none can truly be considered a minority. As a result, any protection of access to media for minority groups, is mostly based on rather abstract, generic anti-discrimination regulation.

- With regards to access to media for people with disabilities, there are different institutions and regions in Belgium that have policies and regulations in place. In practice this creates a fragmented implementation of measures. PSMs generally do a better job than private actors in implementing them, as they annually have to report their efforts in this regard.
- The previous management contract of the Flemish PSM VRT contained quotas on women and minorities. However, in the new management contract (2026-2030) these quotas have been replaced by a commitment that is rather vaguely formulated.
- With regards to local media, both the Flemish and French speaking Communities face issues. In its yearly concentration report, the Flemish media regulator VRM warns for financial pressure on Flemish media companies, leading to a negative influence on local diversity. In the French speaking Community, the governments have proposed reforms for local and regional media in terms of budget cuts.

3. In-depth results

Belgium

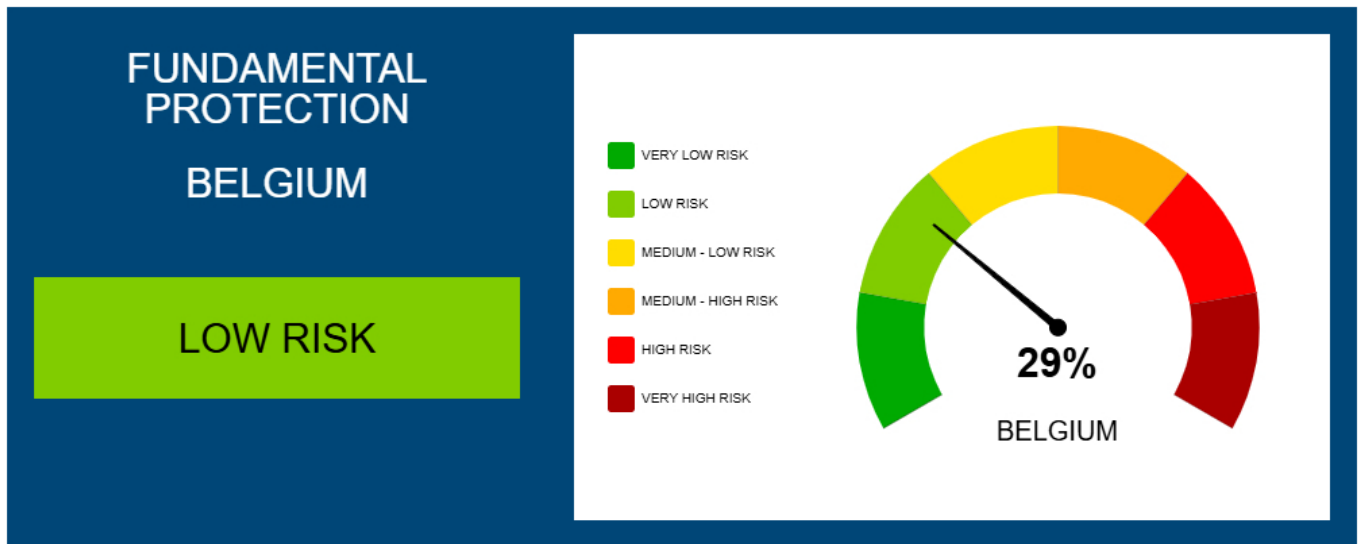


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For the 2026 implementation of the Media Pluralism Monitor, Belgium performs well in the area of **Fundamental Protection** and **Political Independence**. With regards to **Fundamental Protection**, the media authorities act independently and effectively. However, violence towards journalists and SLAPP's remains a topic of concern. **Political Independence** also scores a low risk. However, some elements of risk can be found at the level of indicators, both in terms of regulatory matters and actual practice. Most notable issues concern the transparency of (online) political advertising and State advertising. **Market Plurality** remains, as in the previous years, the most problematic area, and it has remained in the high-risk band. Economic risks are mostly related to the concentration of ownership in a very small media market and to the new threats in the digital domain. **Social Inclusiveness** has improved but remains in the medium-low risk area. Despite some positive changes, there is still room for improvement in the domains of gender equality and local and regional media.

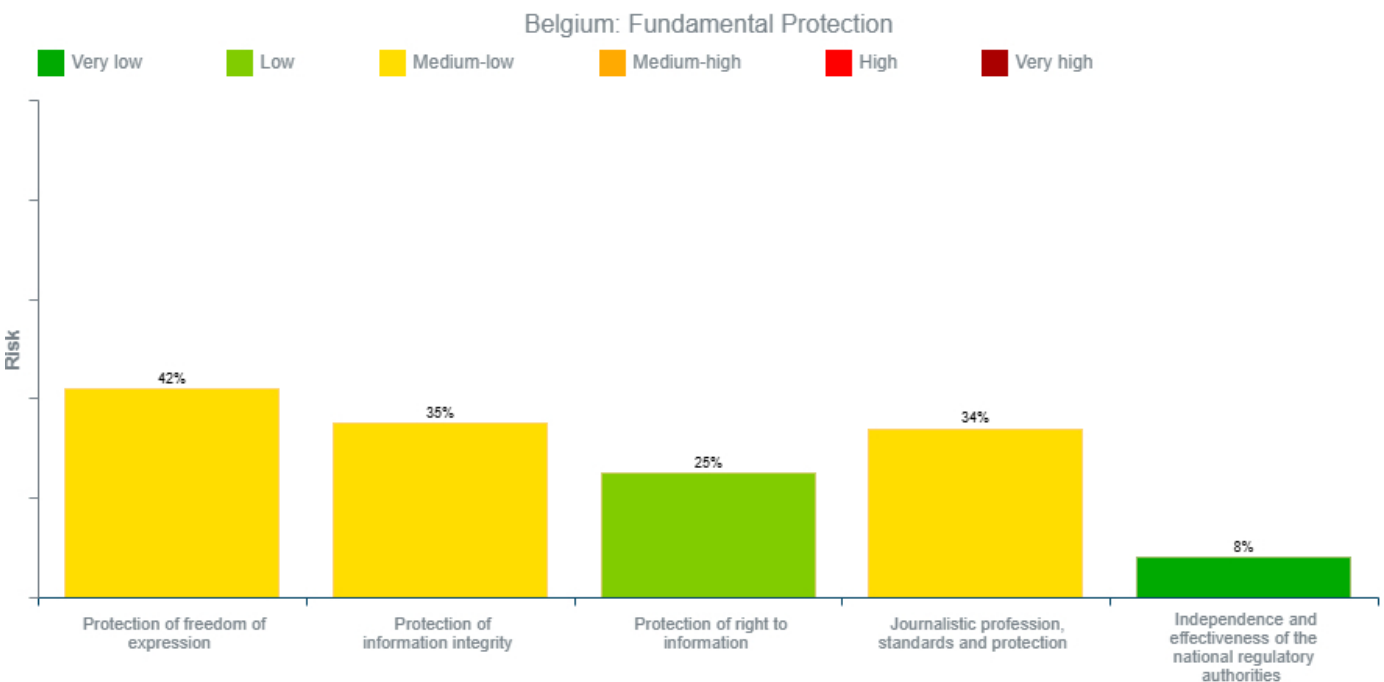
3.1. Fundamental Protection

The Fundamental Protection area considers the necessary preconditions for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression; the right to seek, receive and impart reliable and accurate information, including the right to access information and the protection of information integrity; favorable conditions for the free and independent conduct of journalistic work; the presence of independent and effective national regulatory authorities.



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The overall situation for **Fundamental Protection** in Belgium remains relatively strong but shows signs of growing pressure in several areas. While core legal safeguards for freedom of expression and regulatory independence are in place, recent trends point to increased risks, particularly regarding the safety of journalists and the effectiveness of protections against harassment and online threats.



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Freedom of expression has been recognised in the Belgian Constitutions since its inception in 1831. The core revolves around article 25, which stipulates that "the press is free; censorship can never be established; no guarantee (a guarantee consists of depositing a sum of money as security for the enforcement of any conviction that might arise from the publication of a writing) can be demanded from authors, publishers or printers^[6]. When the author is known and resident in Belgium, neither the publisher, nor the printer, nor the distributor can be prosecuted. In addition, the European Convention on Human Rights was ratified with no significant reservations or declarations.

However, in the past, Belgium has struggled with the so-called a priori restrictions, where the courts prohibited certain news items to be published or broadcasted. In 2011, the European Court of Human Rights condemned Belgium because as it stands, the legislative framework, together with the case law of the Belgian courts, did not fulfil the condition of foreseeability required by the Convention. As the interference complained of could not be considered to be prescribed by law, there had thus been a violation of Article 10 of the Convention^[8].

Issues requiring particular scrutiny:

- **A Priori restrictions**

This is a recurring issue throughout the several implementation rounds of the MPM. It seems that the case law of the European Court of Human rights has still not yet fully been incorporated by the Belgian courts. In 2025 (Court of First Instance, Liège), there was a case where a journalist wanted to publish an article about a judicial investigation into a local politician for tax fraud. The local politician requested from the court of first instance that the publication would be 'provisionally be suspended'. In first instance, the court agreed with the politician. The publisher of the article appealed to this decision and the court of appeals of Liège overturned the publication ban in June 2025. In its decision, the court explicitly referred to the case law of the European Court of Human Rights^[9].

- **SLAPPs**

There was a case in 2025 where the court explicitly refers to the EU Anti-SLAPP Directive and condemned the legal actions as potentially aimed at "intimidating and draining opponents". The claim was directed to a non-profit organization that accused the opposing party of fraudulent property sales. The court ruled that although the claimant is entitled to privacy protection, they must be able to tolerate 'a certain degree of criticism' and 'legal actions which, as in this case, are intended to financially ruin other (...) parties should be viewed with the utmost suspicion'. 'The underlying intention of the claim is clearly to intimidate critical voices,' the judge stated. The claimant appealed the ruling.^[10]

At the beginning of 2025, the federal government introduced a law proposal to transpose this Directive into

national law^[11]. The Council of Ministers approved this proposal in December 2025. The Council of State now must give its advice^[7]. At two levels the bill calls for a broader approach than the Directive, as it:

- applies also to SLAPPs where both claimant and defendant are domiciled in Belgium, not only to lawsuits with a cross-border impact;
- applies to both civil and criminal proceedings.

Overall, the proposal follows the provisions of the Directive.^[12] The main procedural guarantees would be incorporated in the Judicial Code and in the Code of Criminal Procedure. For instance, it gives the court the possibility to dismiss a manifestly unfounded claim at an early stage of the proceedings. As the Directive requires effective, proportionate and dissuasive sanctions, the proposal defines a specific sanction in the case of a SLAPP: the plaintiff can be ordered, on request or even ex officio, to pay damages to the defendant. These damages can include all attributable types of procedural costs, including the full costs incurred by the defendant for legal representation, unless such costs are excessive. A new section in the Code of Private International law would be introduced, which would provide the possibility to refuse recognition and enforcement of judgments given in third countries that qualify as SLAPPs.^[13] In the same Code, a new provision would give Belgian courts jurisdiction to hear claims for compensation for damage and costs suffered by a natural or legal person domiciled or established in Belgium as a result of a SLAPP claim brought before a court in a country outside the European Union by a claimant residing or established outside the European Union.^[14] Finally, there is also a role for the government, which would need to provide support for initiatives aimed at raising awareness and organising information campaigns on SLAPPs within one year of the entry into force of the law.^[15]

PROTECTION OF INFORMATION INTEGRITY

MEDIUM-LOW RISK

Current data to assess online platforms' practices regarding freedom of expression are insufficient. While most online platforms provide transparency reports, these tend to be too vague and lacking sufficient granularity to meaningfully evaluate how content moderation works in practice. At the moment, there seems to be a gap between formal compliance and real accountability, as the available data does not clearly show whether measures are effective or fairly applied. In Belgium, regulatory oversight is still developing, limiting the ability to properly monitor and enforce standards. On a positive note, no reports suggest that public authorities fail to respect freedom of expression online.

Issues requiring particular scrutiny:

- **Online content moderation**

As in the previous year, we have to rely on the transparency reports that have been published by the very large online platforms (VLOPs) and search engines (VLOSEs) themselves. Information related to Belgium is either limited or too vague to draw conclusions^[16]. At the end of 2024, the Belgian Institute of Postal Services

and Telecommunications (BIPT) was designated as the Digital Services Coordinator (DSC). BIPT has published a report as the DSC but mentions that there were only preliminary results and that a full report for 2025 will be published in 2026^[17].

- **Disinformation**

As in the previous years, there is no single comprehensive strategy for addressing disinformation, but various levels of government deal with the topic. Funding is provided to independent initiatives dedicated to monitoring, debunking, and researching disinformation. These efforts are mainly led by media organizations, non-profit entities, and academic institutions, all aiming to uphold information integrity and enhance public awareness. However, despite the fact that these initiatives are well established, there is no permanent strategy and some projects struggle financially.

PROTECTION OF RIGHT TO INFORMATION

LOW RISK

The right of freedom of information is incorporated in the Belgian Constitution^[18]. In 1993, the Constitution was amended to include a right of access to documents. Article 32 now stipulates that “everyone has the right to consult any administrative document as well as to obtain a copy”. However, exceptions to this right are possible. Given the federal structure of the state, this right has been incorporated in several legislations: federal, regional, provincial and municipal. This has led to regulation that can be considered quite fragmented, leading to confusion for the public as to know the correct scope of their right to access certain documents^[19].

Directive (EU) 2019/1937 with regards to whistleblowers was transposed into federal law in December 2022 and applies to both employees in the private and public sector^[20]. It requires that companies have a reporting channel, either by e-mail, a tool, an application or orally. It needs to be an administrator from the HR or legal department and a reply has to be issued within three months. If companies do not comply, they risk criminal sanctions. The Federal Institute for Human Rights (FIRM), an independent institution set up by the Federal Parliament in 2019 to protect and promote fundamental rights in Belgium, is responsible for providing information to whistleblowers and to anyone seeking information on the subject^[21]. It also has the task of preparing an independent evaluation report every two years on the protection of whistleblowers in Belgium. They published their first report at the end of 2025^[22].

Issues requiring particular scrutiny:

- **Refusals of access to information**

Despite the existence of the right of access to information, research shows that administrations do not always respond to requests for information or deny them. A study by independent news media Apache and newspaper De Tijd revealed that in many cases, governments and administrations unjustifiably refused access to information.^[23] Other recent research indicates that 35.5% of the municipalities (206 out of 581) did not respond to requests for information (by email). Reasons for refusal concern the exemptions detailed

in the law, sometimes in vague terms, and without explanations, such as “the request is too vague or abusive”. Some pertain to the lack of resources and/or competencies sometimes raised. Most municipalities invoked a lack of resources to cope with the demand, replied that documents could not be formatted properly, or sent documents in raw, unreadable formats^[24]. The Commission for the access to documents stated in its report for 2023: “ The Commission regrets the lack of responsiveness of some administrative bodies towards citizens and urges those bodies to always justify any refusal of access on the basis of the Act of 11 April 1994.”^[25]

- **Protection of whistleblowers**

In its first report on the new law (published December 2025) the general conclusion of the FIRM is that there is strong progress but the rules are still too complex. It calls for more "clarity, harmonisation and awareness-raising so that reporting becomes a right that everyone understands and can invoke"^[26]. FIRM notes that the system remains difficult to understand, both for whistleblowers and for the authorities themselves. Two laws coexist – one for the private sector and the other for the federal public sector. This leads to differences in how whistleblowers are treated. It recommends better harmonisation of the existing legislation with regards to whistleblowers to ensure fair protection for all of them, regardless of the sector and field in which they work. FIRM also recommends simplifying certain procedures and placing greater emphasis on disseminating information about the existence of this right and the role of the various actors^[27].

JOURNALISTIC PROFESSION, STANDARDS AND PROTECTION

MEDIUM-LOW RISK

The indicator **Journalistic profession, standards and protection** continues to maintain a medium risk. One area of concern that was addressed in previous MPM implementation rounds, namely the working conditions of freelance journalists, remains an issue. Another issue of concern is violence against journalists: the Flemish journalist association VVJ (Vlaamse Vereniging van Journalisten) has a report mechanism where journalists can report cases of violence or harassment.

Issues requiring particular scrutiny:

- **Working conditions of freelance journalists**

Journalists employed under fixed contracts are protected by labour law, while freelance journalists remain in a more precarious position. In Belgium, wages are automatically indexed to inflation. For journalists with fixed employment contracts, this indexation occurs automatically. In contrast, for freelance journalists, any adjustment must be decided by the media organisation. Flemish journalist organisation VVJ held a survey among its freelance members about the rates and it shows a widely divergent landscape, with differences between online and offline, regional and national editions^[28]. However, private company Mediahuis, news agency Belga and PSM VRT augmented their rates collectively. DPG Media followed partially. Despite multiple collective appeals, Roularta is sticking to the old price tables. When asked, "Do you think you are generally compensated fairly for delivering quality work?", 59% of respondents answered no. Only 19% said yes, and the rest remained neutral: "We are constantly underpaid," someone wrote in the comments. "But

we continue to put up with it because we love our job so much. Unfortunately, this perpetuates a system that is not sustainable. I plead guilty, because I do it too".^[29]

- **Working conditions**

Specifically for journalists at Mediahuis and DPG, the main publishers in Flanders, plans are underway to restructure compensation by reducing gross salaries and converting a portion into copyright royalties^[30]. Mediahuis, for example, intends to convert 22.5% of journalists' gross salaries into copyright royalties, which are taxed at a favorable rate of 7.5%, while also implementing an average 10% reduction in gross wages. Due to the tax advantage, net salaries would remain stable or even increase slightly^[31]. Although this may appear beneficial, it has sparked significant protest because other employment benefits—including sick leave, severance pay, and pension accrual—are calculated based on gross salary. The Flemish journalists' organization VVJ has publicly opposed these plans and is urging the companies to reconsider^[32]. In the summer of 2025, it was revealed that women's magazine Elle published articles on its website under the name of fictional journalists. Research of PSM VRT showed that more than half of the online content was generated with the help of AI and was published under made-up profiles. There was no transparency about the fact that these articles were written with the help of AI.^[33]

- **Violence against journalists**

Each year, Flemish journalist association VVJ publishes its report about violence towards journalists. The data is gathered from their platform www.persveilig.be (where journalists can report incidents) and general media coverage^[34]. Online harassment is increasingly common and digital safety is jeopardised; again in 2025, images of journalists were used to mislead the public into shady investments. For instance, in a deepfake video, an interview with journalist Goedele Devroy and prime minister Bart De Wever, the latter recommends to invest in a made-up project that would bring quick financial benefits to the public. A team of police officers posed as journalists to unmask the 'Bende van Nijvel' (a gang that committed very violent crime in the 1980's and despite extensive investigations, was never uncovered).^[35] It raises questions about the abuse of journalistic capacity and the potential danger it creates for journalists themselves. After a demonstration in Brussels, 10 complaints were filed at Comité P, the internal investigation department of the police. Photo journalist Erika Di Benedetto testifies: 'when the protesters left the Beursplein, the police was waiting for them. Suddenly, they threw tear gas at the people. I was knocked to the ground and my camera was almost damaged.' Later that evening, she was attacked again by the police at the European Parliament: 'I saw a group of police officers beating a woman. She was lying on the ground and I tried to film it. I shouted at the police to stop. When I did, another officer came towards me. I shouted: 'I'm from the press,' but he hit me on the hip with his baton. Di Benedetto stated, 'I have been documenting protests for many years, but even in Hungary I have never experienced this kind of police violence'.^[36] Journalists also face aggression from the public. For instance, a cameraman of news channel VTM News and his sound engineer were filming an incident in Brussels. After taking a few shots, they were suddenly severely intimidated by a group of about ten men. Fortunately, the police intervened. In February 2025, a journalist from newspaper Het Nieuwsblad went to report a fire in a city. At the scene, the journalist was violently attacked by a local resident. There are also attacks on journalists from the political side. For instance, a political journalists is no longer welcome to attend the press conferences of the right wing political party Vlaams Belang^[37]. On the French speaking side, there is the standing feud between public PSM RTBF and George Bouchez from the liberal political party. In the summer of 2025, he was accused of threatening a

RTBF journalist after an article about the alleged misuse of a disability parking card^[38]. The European Federation of Journalists referred the matter to the Council of Europe for ‘undermining the safety and physical integrity of journalists’^[39].

Art. 4 EMFA – Protection of sources and surveillance of journalists

The Act on the protection of sources grants journalists the right not to disclose their sources and prohibits investigative measures (e.g., interception of communication, surveillance and judicial search and seizure) vis a vis journalists if this could lead to a breach of the secrecy of their sources.^[40] Article 4 of this act allows for very limited exceptions to this right which are in line with ECtHR case law. Detection or investigation measures such as searches, house searches, seizures, the interception and recording of telephone conversations may not involve data relating to the journalists' sources of information, unless such data can prevent certain crimes being committed, and with compliance with the conditions stipulated therein. The Belgian Act on the protection of sources does not currently mention anything about intrusion software. However, the law of 30 November 1998 regulating the intelligence and security services currently provides a framework for the principle of intrusive methods such as intrusion software, but does not otherwise address the ‘techniques’ of implementation.^[41] According to the Standing Committee, the current legal framework allows Belgian intelligence services to use this type of software, provided the principles of legality, proportionality and subsidiarity are strictly observed.^[42] In general, the Belgian law on the protection of sources of 2005 complies with article 4 of EMFA. However, as the law came into effect in 2005, there is no explicit mention of the use of digital technologies such as spyware. There is some protection as surveillance techniques always have to be signed off by a judge and only if the conditions of the law are met.

INDEPENDENCE AND EFFECTIVENESS OF THE NATIONAL REGULATORY AUTHORITIES

VERY LOW RISK

Media regulation is regionalized and both the French speaking and Flemish Community have their own media regulator, respectively the Conseil Supérieur de l’Audiovisuel (CSA) and the Vlaamse Regulator voor de Media (VRM). Both are independent authorities that operate transparently and objectively, minimizing the risk of political or economic interference. In 2025 there have been no cases that indicate a lack of independence of these media regulators. Both annually publish reports on their activities and their decisions are available on the respective websites.

There exist regulatory safeguards for these organisations. First, being a member in the media regulator is generally incompatible with a position in the Government or with having an interest in a media or advertising company. Second, the selection of experts is based on objective criteria. Third, only a court can overturn a decision made by the media regulator, providing transparency and accountability within the decision-making process.

With regards to the DSA, in Belgium, numerous levels of government are involved in the application of the DSA, both at federal and community level. For this reason, four competent authorities were designated in Belgium. At the Community level, the Medienrat was designated for the German-speaking Community, the Flemish Media Regulator (VRM) for the Flemish Community and le Conseil supérieur de l'audiovisuel (CSA) for the French Community. The Belgian Institute for Postal Services and Telecommunications (BIPT) is designated for the federal level. Among these regulators, the BIPT was appointed as Digital Services Coordinator (DSC) under the DSA^[43]. Given Belgium's division of powers, this has to be done in a cooperation agreement concluded between the federal state and the Communities. That agreement has been ratified by the federal Parliament and the parliaments of the communities and designates BIPT as the national coordinator.

Art. 7 EMFA – Independence of the national regulatory authorities

In both the French speaking and the Flemish Community, the media regulators are set up as a separate legal entity and their independence is explicitly recognized in the legal framework.

The deciding organ in each regulatory body is entirely comprised of experts. Both regulations contain provisions about incompatibility with certain mandates or functions. In Flanders, “a member of the general chamber may not have any link with a media, advertising or promotional company or organization, or with a distributor of broadcasting signals, nor have economic interests in such companies or bodies” (art. 216 FIRTA). In the French speaking Community, membership of the French speaking media regulator CSA is incompatible with certain political mandates such as a member of the Federal government, a Community or regional government; a member of the cabinet of a European, federal, Community or regional; holding the office of mayor. In addition there may not be a personal or functional conflict of interest, due to being a member of staff or the board of directors of RTBF or a service provider or holding a position or interest in a company or organisation carrying out an activity in competition with companies or organisations in the audiovisual sector;

All community regulatory bodies are sufficiently funded and staffed. They are all funded by the state, i.e. their respective Community. No authorisation, licence, market surveillance or other fees serve to fund the regulatory bodies. The money coming from fines goes into the respective Community's budget. Each community regulatory body has to draft its own budget and propose it to its minister, who then defends it to the community parliament, which has to approve it. Industry players are not involved in this process.

In its recommendation to the Flemish government for a new coalition agreement ('regeerakkoord'), the VRM states that Flemish media regulations are largely determined by European Union regulations (directives and regulations), and during the last legislative period, numerous new European rules relating to media were enacted and/or transposed (e.g. AVMS, DSA, DMA, EMFA). This has consequences for the powers and tasks of the VRM. According to the VRM, the budget and personnel at the moment is not in line with the additional tasks. Additional financing will be necessary to act effectively, efficiently and independently.^[44] In its yearly report, the French speaking regulator CSA mentions that in October 2024, the Government of the Wallonia-Brussels Federation informed the CSA that its allocation for the 2025 financial year would remain unchanged, whereas the funding

agreement provides for annual indexation and a 1% increase to adjust for inflation and seniority-related salary costs.^[45]

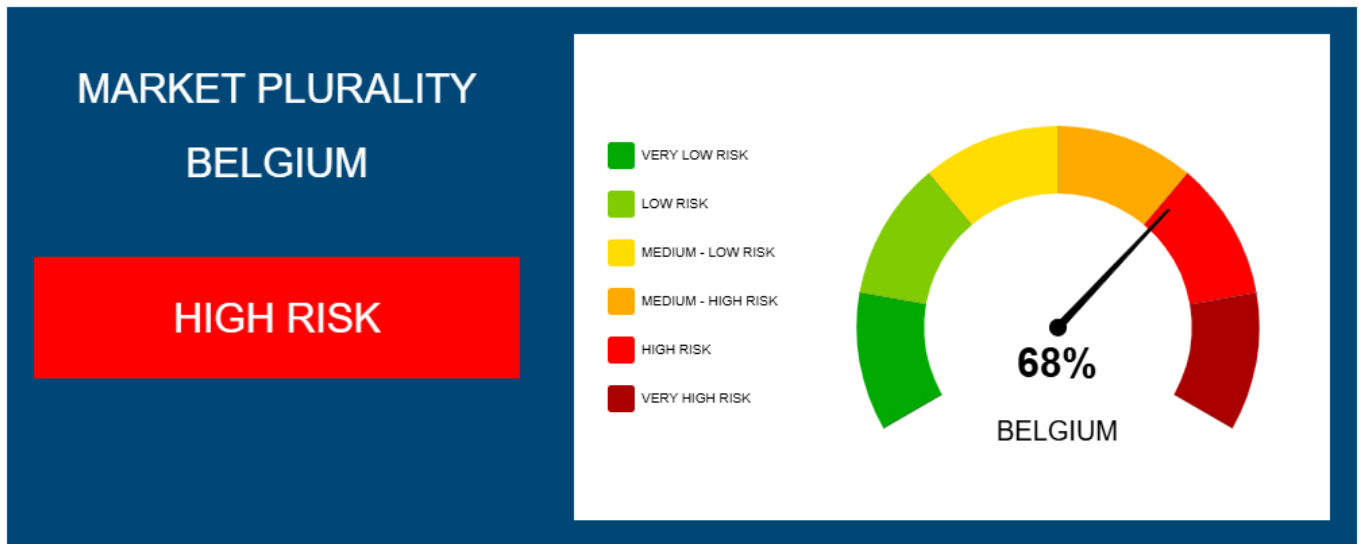
Recommendations for Fundamental Protection

To the State:

- The European anti-SLAPP directive should be transposed into Belgian law as soon as possible. Such transposition is important to protect public participation, democratic values and fundamental rights, and in particular the protection of journalists
- Improve transparency and efficiency of the process to obtain government-held information for citizens and journalists in order to enhance trust.
- Improve the working conditions for freelance journalists.
- Further action is needed to combat the growing threats, harassment, and intimidation targeting journalists. The government, law enforcement authorities, and media sector should expand protective measures, and improve enforcement capacity against online threats.
- Harmonise legislation to ensure fair protection for all whistleblowers and disseminate information about the law and the rights it provides.

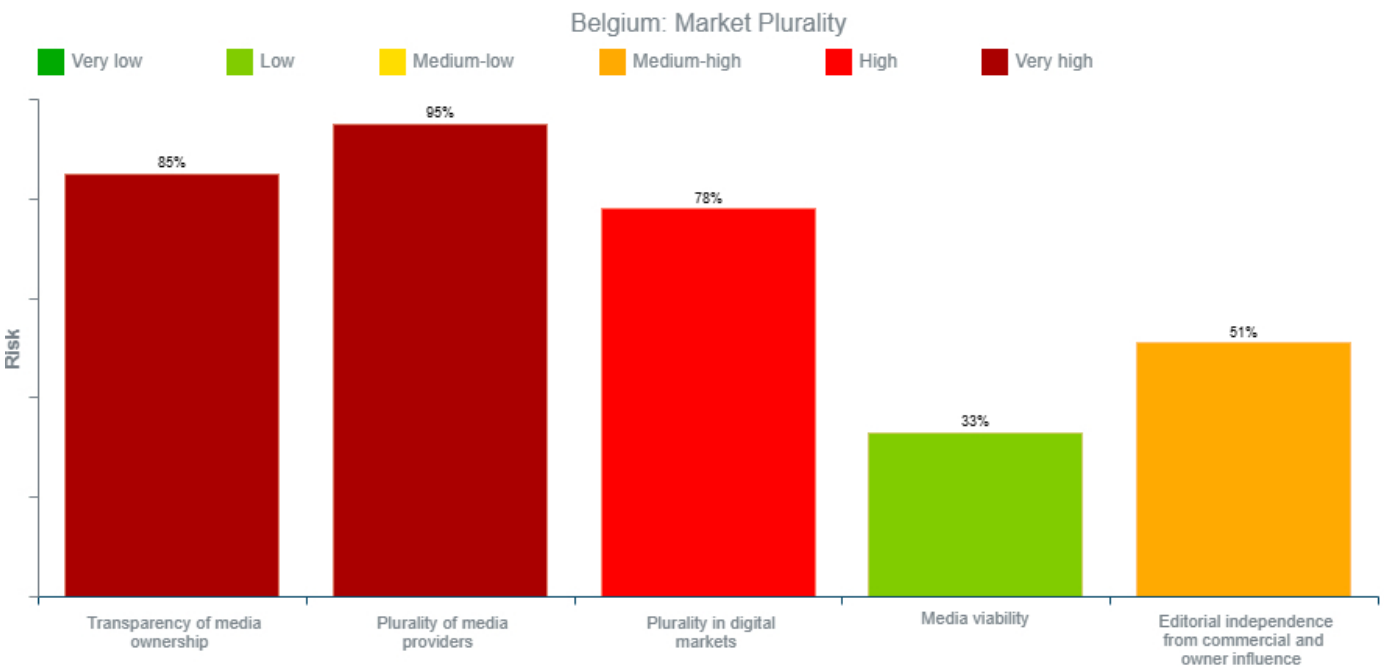
3.2. Market Plurality

The Market Plurality area considers the economic factors that impact the plurality of media offer, assessing the risks deriving from insufficient transparency and high concentration of media ownership, economic sustainability of the media, and the undue influence of commercial interests and ownership over editorial choices. Moreover, the area assesses the risks deriving from high concentration of digital markets and dependency of the media on online intermediaries.



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Market Plurality is the area of the Belgian media landscape where the greatest risks to pluralism are found, with a high risk score. Belgium’s newspaper and television market is highly concentrated, and it is not likely that this concentration will decrease in the years ahead.



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The risk for this indicator relates to obstacles that hinder the effective disclosure of media ownership to public authorities and/or the general public and shows an increase to high risk for this year's implementation of the MPM. This can be attributed to the lack of regulation in terms of transparency in media ownership in general and in relation to the EMFA provisions in particular. The current legal framework on media ownership transparency differs between the Flemish Community and the French Community but shares similar objectives of ensuring pluralism and regulatory oversight.

Flanders: Under the Flemish Radio and Television Decree (FIRTA), broadcasters applying for licences (local, regional, community radio and regional TV) must disclose information on their company statutes and financial and shareholder structures to the Flemish Media Regulator (VRM). Any subsequent changes in shareholding must also be notified and approved by the Flemish Government, which assesses them with regard to maintaining media pluralism and diversity. Broadcasters, distributors and network operators that are only subject to notification obligations must also provide information on their statutes, financial structure, shareholders and board members. They must submit annual reports to the VRM containing shareholder information. However, there is currently no obligation to disclose ownership information publicly on their websites.

French Community (FWB): Media legislation requires broadcasters (editors of audiovisual services) to ensure transparency toward both the public and the regulator (CSA). Broadcasters must publish "basic information" on their website or the CSA website, including ownership structure, shareholders, board members, management, services offered, and financial accounts. They must also provide detailed ownership and control information to the CSA, including shareholder identification and their interests in other media companies. These rules aim to allow the public to assess the reliability and independence of media content.

In both communities, the rules mainly apply to licensed audiovisual media services. They generally do not cover digital-native media outlets or the press sector (newspapers and magazines). Both communities are preparing legislative amendments to comply with the European Media Freedom Act (EMFA). These proposals foresee the creation of public databases on media ownership managed by the respective media regulators, where broadcasters will have to submit and update ownership information. Information regarding media ownership is partially disclosed to public bodies and the public. On the federal level, there is the general database of the federal department of economics (Crossroads Bank for Enterprises) where some information can be found about ownership^[46]. However, this applies to all companies so it is not a generally searchable database. In addition, there is the yearly media concentration report of the Flemish media regulator VRM which also includes information about ownership structures and concentration in the Flemish media landscape^[47]. This is part of their mandate to monitor media concentration in the country. The media regulator for the French speaking part, the CSA, has a dynamic online databases to inform the general public about ownership structures of media companies^[48].

Issues requiring particular scrutiny:

- **Disclosure of media ownership with regards to financial information**

There is no national law that contains specific provisions requiring financial reporting in the media sector. This makes it difficult to evaluate the financial performance of publishers and commercial broadcasters. Retrieving this information is especially complicated and often impossible, because the financial results of media companies are often not published by media type.

- **Information by the media regulators is incomplete**

The media concentration reports of the media regulators describe the ownership of the largest news media in Belgium. However, these reports do not include information about digital native news media actors for which media regulatory authorities in Belgium have limited data regarding financial or ownership structures.

PLURALITY OF MEDIA PROVIDERS

VERY HIGH RISK

In both parts of the country, there are only a handful of organizations that hold a very large share of the Belgian media landscape. On the Flemish side, these are PSM VRT, DPG Media and Mediahuis. On the French speaking side, these are IPM and groupe Rossel. There is also cross-platform ownership: DPG Media is active in all three sectors of the media chain: television, radio and publishing. Also online the most-used news websites are owned by the same organizations as in the non-digital market. Considering this strong degree of media concentration, this indicator is considered to be of very high risk.

A second factor explaining the very high risk level is the lack of sector-specific anti-concentration rules. Apart from some restrictions on the accumulation of radio or TV licenses, regional media laws^[49] do not contain specific thresholds or procedures for (cross-)media mergers, mainly caused by the division of powers in Belgium between the federal state and communities. General merger control rules also apply to the media sector. The Belgian Competition Authority occasionally attaches conditions to a merger with the goal of ensuring diversity of media content, but this has not prevented the current high level of concentration^[50]. In the French speaking part there are some thresholds. However, surpassing these thresholds are not prohibited unless obtaining a "significant position" would result in a detrimental effect on media pluralism, as assessed by the media regulator CSA on a case-by-case basis^[51].

Issues requiring particular scrutiny:

- **Highly concentrated market**

In June 2025, in the French speaking part, publishers Rossel and IPM announced their planned merger. The merger is now under revision of the Belgian Competition Authority. If the merger would be approved,

there would be only one publisher on the French speaking side of the country.

Art. 22 EMFA – Media plurality test

Media law is a competence of the language Communities (regional level). Both the Flemish and the French speaking government have introduced proposals to amend the existing media legislation and make them compliant to EMFA. However, the federal government is competent for competition law and some form of cooperation with the Belgian Competition Authority will have to be arranged.^[52]

PLURALITY IN DIGITAL MARKETS

HIGH RISK

This indicator also scores a high risk. Specific media legislation that contains thresholds to prevent a high concentration of ownership is not present. There are no financial agreements between Generative AI companies and media providers, to remunerate the rightholders for the use of copyright-protected content.

According to a survey of United Media Agencies and United Brands agencies with their members, digital advertising represented 39% of total media spendings in 2024. This benchmark also includes the breakdown of digital spending between local and international players. In the questionnaire sent to the agencies concerned, the latter category is referred to as 'GAFAM'. Based on the combined responses per digital channel, it can be concluded that international players account for approximately 62% of the total digital advertising market in Belgium, a share that appears to be stabilizing.^[53] There is a deal between Google and the Belgian publishers regarding their online news content. However, the details of this deal are not public and were negotiated by the publishing companies themselves and not the sector organisations.

Issues requiring particular scrutiny:

- **Copyright protection and publishers' remuneration**

There is the Belgian Act which transposes Directive (EU) 2019/790 of 17 April 2019 on copyright and related rights in the Digital Single Market^[54]. This legislation goes further than what the EU prescribed by mandating that online platforms have to enter into licensing agreements with press publishers. The Act also empowers an administrative authority, the Belgian Institute for Postal Services and Telecommunications (BIPT), to impose remuneration where platforms and press publishers fail to reach an agreement. Additionally, the Act establishes a mandatory right to remuneration for authors and performers, managed collectively through Collective Management Societies (such as Sabam), to be paid by platforms disseminating their works online, including streaming services. However, this act was challenged by Meta (Facebook), Google and others before the Constitutional Court, which referred 13 questions to the Court of Justice of the European Union (CJEU) for a preliminary ruling in an annulment action. The case is still pending^[55].

The media sector faces growing financial pressure due to declining revenues and strong competition from digital platforms. These pressures threaten the sustainability of the media and risk weakening the diversity of the media landscape over time. A report from PWC shows that media growth in general is under pressure due to changing consumer behaviour resulting in declining traditional TV revenue, and newspaper, consumer magazine and books revenue^[56]. We have to take into account the specific media system of the country, meaning that there are two parallel media markets, one Dutch-language and one French-language. In practice they operate largely independently, which limits economies of scale and reduces competition between the two markets. Moreover, a study shows that there is a difference in spending between the Flemish and the French speaking part: *"While the Belgian population is roughly divided between Dutch speakers and French speakers in a ratio of 57-43, the study shows that advertising investment in the media is divided more along the lines of 65-35. In other words, for every €65 invested in Flemish media, only €35 is invested in French-language media"*.^[57] Flemish media regulator VRM notes in its yearly media concentration report that there is increasing pressure from international giants and the digitisation of the media market which causes a further decline in (advertising) revenues. When looking at the media groups as a whole, we see a turnover curve that has shown a slight upward trend over the past three years, while the curve for the number of employees has shown a slight downward trend over the same period. The operating profit curve experienced a sharp decline in 2023 and will continue to decline in due to difficult, competitive market conditions and rising cost inflation. In addition, some companies also faced sharply increased distribution costs. In summary, they conclude that margins will continue to decline despite the (average) stabilisation of turnover^[58]. Due to the far-reaching forms of vertical and cross-media integration, the VRM finds it impossible to present financial data to present for the different segments of the value chain. This is because the financial data refer to all activities of the company and not just their individual media activities^[59].

With regards to digital advertising, research shows that this accounts for only 37.5% of total advertising revenue. This is significantly less than the European average. In addition, the distribution of digital advertising between local and international players (international platforms and Big Tech) seems to be stable compared to the first half of 2024. Although it declines every year, linear television remains the leading advertising medium, with more than 187 million in revenue between January and June and a 30% market share.

According to experts, Belgium can be considered a rather conservative market, still lagging behind in digital technology, which has helped to protect it^[60].

The yearly report of the Flemish journalist association VVJ shows that there is a slight increase in the number of journalists in the past year^[61].

Issues requiring particular scrutiny:

- **Consequences of abolishing the bpost concession**

For years, the Belgian government subsidized newspaper delivery through a distribution concession granted to state-owned company bpost. The system ensured that newspapers could be delivered nationwide early in the morning, even in rural areas. In 2023, the Belgian government published a tender to award the new contract. It turned out that private company PPP could offer a lower price for the same job. The government decided to withdraw the tender and introduced a new system of subsidies, that would gradually decline until 2027^[62]. The new distribution system generates a lot of complaints, both in Flanders and in the French-speaking part. One of the difficulties is finding personnel with the necessary experience and qualifications.

At the beginning of 2025, nine journalists of newspaper Het Laatste Nieuws were let go. One of the reasons cited was the new distribution agreement^[63].

In 2022, the Belgian Competition Authority started an investigation because bpost and publishers would have manipulated the tender with the goal of keeping bpost as the only candidate. The investigation was finished in the summer of 2024, but the Competition Authority only decided on the punishment at the beginning of 2026. This led to the following fines: Mediahuis has to pay a fine of 7,8 million euros and DPG Media a fine of 3,8 million euros. Bpost does not have to pay a fine because they cooperated with the investigation^[64]. This could have consequences on journalists in the long run.

EDITORIAL INDEPENDENCE FROM COMMERCIAL AND OWNER INFLUENCE

MEDIUM-HIGH RISK

In Belgium, there are no specific legal provisions for social protection of journalists during changes in ownership or editorial direction, though some publishers have editorial statutes to maintain editorial independence, which are not legally binding. Permanent employees are protected by the Act of 3 July 1978 concerning employment contracts^[65], but freelancers lack these protections. Journalistic organisations play an important role in supporting journalists' rights, offering legal assistance, negotiating collective agreements, and providing guidance.

The cause for this risk primarily lies with the ongoing lack of formal protection for journalists and editors accounting for the risks associated with the profession, such as the necessary protection against changes in editorial lines and undue commercial influences or conflict of interests with management or boards. This rings especially true in relation to press media, which receives these protections via self-regulatory statutes and deontology.

While the Social Charter for journalists was previously approved in 2019, there has been no effective implementation resulting in concrete safeguards for journalists^[66].

Though no sufficient hard evidence may be found of commercial influence on editorial content, experts indicate a growing risk of commercial interests and considerations entering editorial-making processes. Such a potential trend notwithstanding regulation of advertising, as well as deontological and ethical standards have consistently been assessed as well-implemented and effective in practice, providing a welcome counterbalance to the potential risks of editorial-decision making becoming influenced in practice.

The Flemish media regulator VRM observes limited commercial influence on newsrooms in Flanders, not so much via advertisers directly “pulling the strings”, but through corporate structures, synergy targets, and data driven publishing practices. At the same time, effective safeguards (editorial statutes, ombuds functions, self-regulation) remain in place, meaning the influence is not systematic and not ubiquitous. They conclude that commercial factors sometimes try to steer the narrative, but are generally kept manageable.

Art. 6(3) EMFA – Separation of editorial and commercial activities

Editorial autonomy - Art 6.3

There were no changes with regards to this part of the implementation of EMFA. The ethical codes of both Councils of Journalism contain an article which states that "The journalist avoids conflicts of interest with persons or organizations with whom he comes into contact professionally." It needs to be highlighted that this requirement is towards journalists. At the moment, there are no public transparency rules in terms of the new EMFA provision. Certain media companies do have so-called editorial statutes, however, these are voluntary and their content is not publicly disclosed.

At the moment, there are no mechanisms granting social protection to journalists in case of changes of ownership or editorial line and no mechanisms granting protection to journalists from arbitrary interferences by owners or management. Both PSMs (Flemish and French speaking) and all private news outlets are members to the Council for Journalism and their code of conduct, which contains several articles aimed at preventing any editorial interference or dependence (eg. articles 9-11).

Recommendations for Market Plurality

To the state:

- Competition law should be revised to reflect the age of platforms, including the scrutiny of mergers between media companies and infrastructure providers relevant to media.
- Planned mergers that could further increase media concentration need to be monitored closely, and evaluated with care and with media pluralism in mind
- Implement mechanisms to increase transparency in the online media environment
- Consider integrating media-specific considerations into existing competition regulations in dialogue with the various levels of government
- Keep track of how digital revenues can (partly) compensate for the decreasing offline revenues

- Developing additional legal safeguards for the professional independence of journalists and editors-in-chief across all media formats

To the media regulators

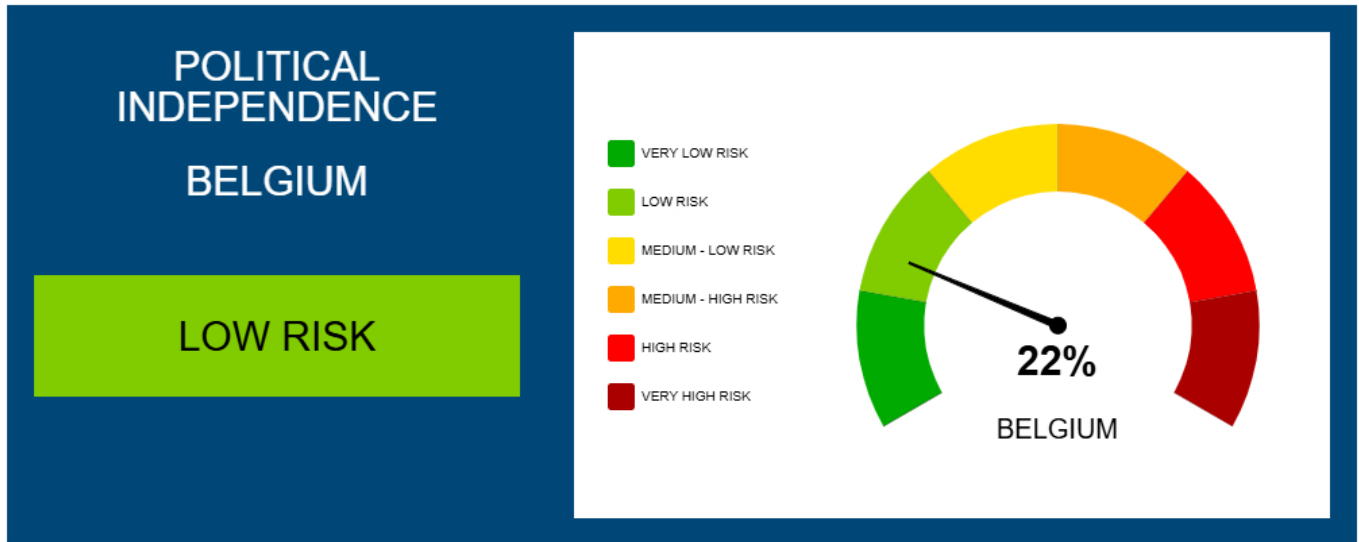
- Develop the database with regard to the transparency of media ownership as prescribed by EMFA, preferably in cooperation with the media regulators in the country.

To the media organisations

- Although not a problem at the moment, do not take editorial independence for granted
- Developing additional self-regulatory safeguards for the professional independence of journalists and editors-in-chief across all media formats

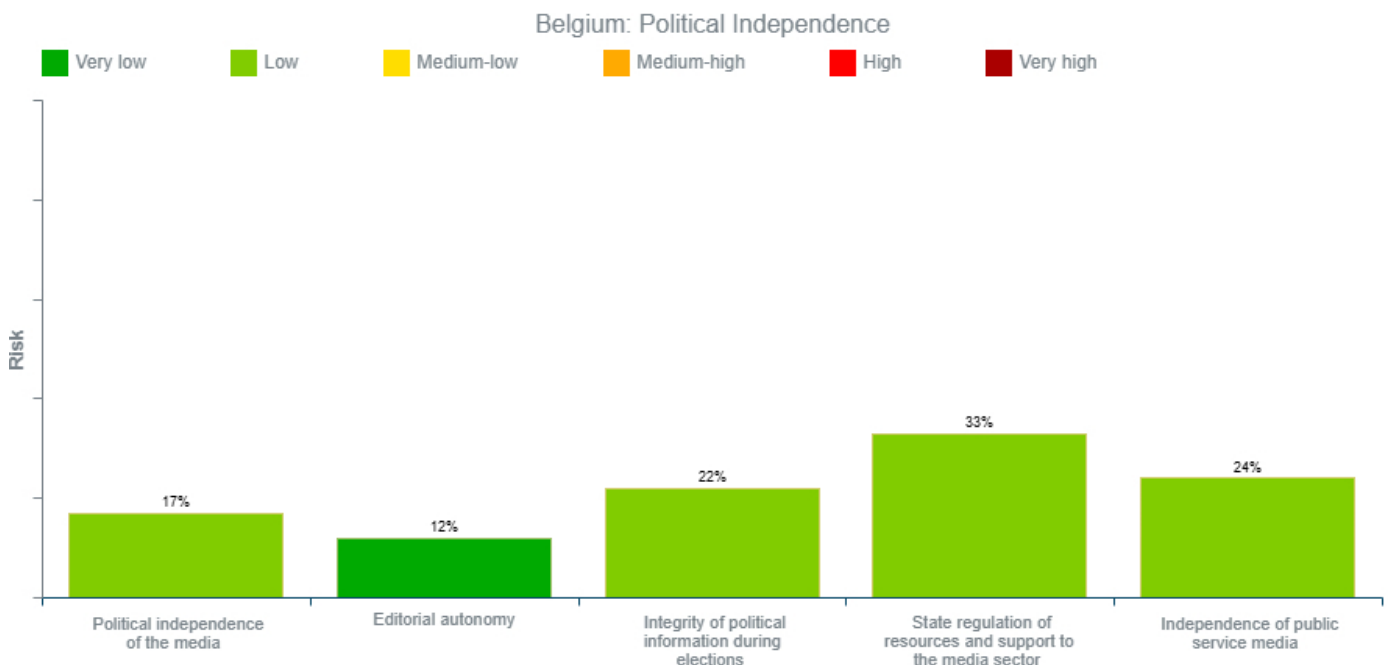
3.3. Political Independence

The *Political Independence* indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and of political power over the functioning of the media market and the independence of the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



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The **Political Independence** area scored overall as low-risk, in slight deterioration.



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There were no significant changes for this indicator, in 2025. Shortcomings in the regulatory framework with regards to preventing direct/indirect political control remain. Links to political parties have been detected in the newspaper and digital natives sectors. Overall, the informal mechanisms in place amongst practitioners appear effective in preserving political independence of the media in Belgium.

Issues requiring particular scrutiny:

- **Absence of specific regulation for news agencies**

Concerning news agencies, there is no regulation at all. However, the only news agency, Belga, falls under the competences of the Media Regulator, being monitored the same as the other media groups ^[67].

- **Regulation concerning direct and indirect control of the media, including conflict of interests**

Both the media legislation of the Flemish and French speaking Community stipulate that television and radio broadcasters must be independent from, or not be linked to, a political party. ^[68] However, these provisions do not prevent politicians (either in government or not) from owning shares in the media. Moreover, an explicit provision that the board of directors cannot have someone with a political mandate is foreseen only for the radio sector in Flanders. ^[69] No specific regulation is available for the written and online press.

- **Links with politics in the press**

Some newspapers still have clear links to political parties in having an advisory board that is filled with politicians (e.g. applicable to Het Laatste Nieuws and liberal politicians, and a persistent influence of CD&V over De Standaard and N-VA over Gazet van Antwerpen specifically). However, in practice, such links do not negatively influence editorial freedom. As to digital natives, in Flanders 't scheldt has very clear and close ties to far-right political party Vlaams Belang. The party is also heavily involved with PAL NWS, which was founded by the current communication chief of the party. At the left side of the spectrum in Flanders, there are clear links between such outlets as Sampol and the socialist and green parties. The situation is less clear in the French speaking part of the country.

Belgium scores a very-low-risk for the indicator of **Editorial autonomy**.

Speaking of external self-regulatory measures, Belgian journalists adhere to the Code of Journalism, which

is overseen by the Raad voor de Journalistiek (RvdJ)^[70] on Flemish side and the Conseil de déontologie journalistique (CDJ) on the French speaking side.^[71] Both the Flemish and the French speaking part have deontological associations, Raad van de Journalistiek and the Conseil Déontologie Journalistique, but their codes do not reference independence from political influence as such.

The Flemish Council for Journalism ('Raad voor de Journalistiek') protects the ethics of journalism, formulates recommendations and deals with complaints. Complaints can be brought both by third party stakeholders who are personally affected by certain behaviour, and by the Council itself, when it deems it is appropriate to investigate certain journalistic behaviour. The Council mainly focuses on mediation and handling complaints. Their code on journalism contains a chapter on "independent information" and focuses on editorial independence. All Flemish news organisations and brands apply the code as well as individual journalists. Similarly, the Conseil de déontologie journalistique (CDJ - Council for ethical journalism) is an organization for self-regulation of the French- and German-language media in Belgium. It consists of representatives of publishers, journalists, editors and civil society. It has three distinct functions: information, mediation and regulation. They also handle complaints.

Speaking of internal safeguards, such as media editorial codes or internal bodies, in Flanders, both newspaper De Morgen and television news journal VTM Nieuws have both an editorial charter and an editorial board. Newspaper Het Laatste Nieuws (HLN) does not have a charter, but it does have a foundation (Raad Het Laatste Nieuws), which monitors the liberal course of the title and approves the appointment of editors-in-chief. For the editorial teams of VTM Nieuws, newspaper HLN and the magazines, journalistic practices and professional ethical principles are laid down in the News City Code. All Belgian publications are also members of the Press Council and comply with the rules of the Council's Code. Mediahuis is mainly active in the newspapers which also have an editorial statute with references to independence.

In the French speaking part, newspaper Le Soir has the Society of Professional Journalists of the Soir (SJPS), created in 1983. Composed of members of the editorial staff, it defends the independence of newspaper and ensures respect for our values. The SJPS also has a force for proposal and a right of scrutiny over the appointment of the editor-in-chief, when the position is vacant. Television brand RTL they also have a sociétés de journalistes, however their documents are not made public. They have a document 'nos essentiels' where pluralism of media – editorial independence is mentioned.

Issues requiring particular scrutiny

- **No obligation to publish editorial statutes**

As there is no legal obligation to publish internal safeguards, precise information on the comprehensiveness of internal safeguards is scattered, while it appears evident that they might differ greatly across different media. Something that, from an external research perspective, complicates an evidence-based assessment on effectiveness.

- **Safeguards on appointments and dismissals of editors-in-chief**

In the French speaking part, different legal texts submit the appointment of an editor-in-chief to the obligation to consult an internal journalists' association. In the Flemish Community, no such provisions are

found. Overall, no problematic cases have emerged lately.

INTEGRITY OF POLITICAL INFORMATION DURING ELECTIONS

LOW RISK

There were no new developments with regards to **Integrity of political information during elections** in the assessment year of 2025. In the Flemish Community, legal requirements that are incorporated in the media decree—alongside ethical standards incorporated in the Flemish deontological code of Council for Journalism—ensure impartiality and balanced political representation in both public service media (PSM) and commercial broadcasting.^[72] Similar provisions exist in the French-speaking community through a charter developed by its media regulator (Dispositif électoral pour les services de la RTBF pour les élections européennes, fédérales et régionales du 9 juin 2024)^[73] and the management contract governing the PSM.^[74] Politicians from both language communities can address the media regulator if they believe coverage is biased or unfair, and there are no indications that these rules are poorly enforced.

Regarding political advertising, however, there are no specific rules guaranteeing equal opportunities for parties or candidates. Instead, the 1989 Federal Law (Act of 4 July 1989 on the limitation and control of election expenditure for elections to the Chamber of Representatives, the financing and transparent accounting of political parties mainly limit campaign spending and the types of communication allowed during election periods).^[75] The restrictions of this federal law apply to both public and commercial media outlets. The federal law also establishes a regulated campaign period—known as the "sperperiode"—which usually begins four months before election day^[76]. During this time, political actors are prohibited from using commercial billboards or posters, from displaying non-commercial posters larger than four square meters, from selling promotional items or distributing gifts, from conducting commercial phone campaigns, and from airing advertising spots on radio, television, or in cinemas. These restrictions do not apply to online political advertising. With regards to online advertising, the media decrees of the Flemish and the French speaking Communities stipulate that these kinds of ads must be clearly identifiable as advertising.^[77]

In terms of transparency, the 1989 Federal Law sets rules on the limitation and oversight of election spending for elections to the Chamber of Representatives, as well as on party financing and financial transparency. According to this law, total expenditures and financial commitments for election propaganda—whether at the federal level, within electoral districts, or within electoral colleges—may not exceed EUR 1,000,000. Political parties must also submit a written declaration confirming that they will comply with legal spending limits and controls, and they are required to report their campaign expenditures and the sources of their funding within forty-five days after the election. Political campaigning conducted online outside official election periods remains largely unregulated. The issues requiring particular scrutiny include:

- **Rules for political parties on campaign spending on online platforms**

The lack of transparency of online political advertising during campaigning is a concern as there is no specific regulation obliging parties or intermediaries to be transparent to authorities on whether these campaigns are run fairly and by use of which techniques. However, thanks to external organizations, some

information on the amount spent for political advertising on social media is available. For instance, there is the organisation, Adlens, that published reports in the past about the spending of political parties on social media.^[79]

- **Political advertising by influencers**

The Flemish media regulator has published its Content Creator Protocol. It is intended for every content creator, vlogger and/or influencer who offers an audiovisual media service and is based in Flanders. It focuses on three key points: (1) Commercial communication on social media; (2) Minors; and (3) Prohibition of hate speech. The VRM issues fines against content creators when they violate these rules. However, they are not specifically related to electoral periods and political advertising is not defined in the Protocol as such. The CSA has general rules when it comes to elections but they do not focus particularly on influencers.

STATE REGULATION OF RESOURCES AND SUPPORT TO THE MEDIA SECTOR

LOW RISK

Frequency allocation under Belgian law is governed by detailed regulations, with media law being the responsibility of the Flemish and the French speaking Community. There have been no cases in the past year in which the effectiveness of these articles have been under question. Both media regulators have enforcement powers in this regard.

There is a legal framework for the distribution of direct and indirect state subsidies to media, both at the federal and regional level. In the Flanders, the FIRTA stipulates subsidies for ensuring accessibility of televisions services. Moreover, the Flemish Government grants annual subsidies (one million EUR) to the print press. A protocol between the Government and the Flemish press sector sets the conditions for the support. The overall objective is to ensure a high quality, pluralist and objective press. Emphasis is put on education and training in order to guarantee editorial skills and expertise, and on foreign coverage. In addition, the Fund Pascal Decroos for exceptional journalism (“Fonds Pascal Decroos voor bijzondere journalistiek”) aims to support high quality, exceptional journalism in and outside Flanders, both in print and audiovisual media. It grants subsidies to individual journalists who would like to work on an exceptional journalistic project, the costs of which exceed the normal budgetary capacities of the newspaper, editor or broadcaster. The Fund is financed by an annual grant from the Flemish Government and gifts. Moreover, through Screen Flanders, the Flemish government gives audiovisual productions that spend part of their budget in the Flemish Region a financial boost. They can apply for refundable advances of up to €400,000 as economic support for their audiovisual releases within the Flemish Region. In return, Screen Flanders receives a participation in the net receipts.

In the French community support exists for the creation titles or groups of titles during their first three years of existence (maximum 5% of total credits earmarked for the print media). Secondly, support is foreseen for the development of original programs to encourage readers to read newspapers, to educate and media education (maximum 5% of total). Thirdly, incentives for the hiring of professional, salaried journalists are foreseen. Fourthly, support is available for projects to adapt to modern communication technologies (maximum 2% of the total). Fifthly, the last type of aid is designed to ensure the greatest possible diversity

within the daily press, by modulating support in relation to the economic performance of each title, according to a calculation method that favors least profitable titles or groups of titles (40% of total credits reserved for the print media). A new decree in the French speaking part was also issued, consisting of financial aid intended for the non-commercial French-language periodical press.^[78]

At the federal level, there used to be a contract between the Belgian State and Bpost for the delivery of newspapers, replaced in 2024 by a new system running until the end of 2026. The system is different for the two Communities. For the French speaking region, a support of 49 cents per newspaper will apply in 2024 and 2025 and 43 cents in 2026. For Flanders, the support will be 17 cents per newspaper in 2024 and 2025 and 15 cents in 2026. As a result, Flemish newspaper publishers will receive another tax credit of EUR 45 million in aid, spread over three years. For publishers in the French speaking part, it is 32 million over three years. Magazine publishers will receive around 9 million euros. Legislation also provides with the federal tax shelter (a tax scheme that allows investments in the production of audiovisual works through a tax exemption) and the 0% VAT rate for printed and digital newspapers on their sale.

Issues requiring particular scrutiny:

- **New system for newspapers delivery and related concerns**

Following the new federal measures for the delivery of newspapers, publishers expressed concerns over a major impact on their products (the cost for the government is 19 million in 2024, 42 million in 2025 and 48 million in 2026, while the previous concession for Bpost was 175 million euros a year). For example, in February 2025, media company DPG Media announced that nine journalists of newspaper Het Laatste Nieuws would be fired. The editor in chief attributes these redundancies to the removal of government subsidies for newspaper distribution by Bpost.

- **State advertising**

With regards to the distribution of state advertising to media outlets there are no clear, media-specific rules or laws. Some transparency obligation is available, however it does not seem to enact proactive transparency by public institutions. There are no recent reports available with regards to state advertising expenditure in traditional media and online.

Art. 25 EMFA – State advertising

In both parts of the country there are legislative proposals to amend the existing media legislation to reflect the obligations of EMFA. However, both proposal do not mention the state advertising obligations of Article 25 EMFA.

This indicator maintains a low risk level, however signalling a risk increase compared to the previous year.

In terms of fair representation of political actors and viewpoints in PSM news and informative channels remained at a low risk, in the non-electoral period, although research has signalled for years a strong focus on the current policy and the politicians of the government in charge in the Flemish PSM VRT.^[80]

In terms of governance mechanisms and related risk, in both communities a procedural connection with the government can be traced (in terms of regulatory safeguards, the Flemish situation being less secured), although in practice no evidence of systematic conflicts in appointment and dismissal procedures of Boards/Directors is found. No cases of influencing the appointment or dismissal of editors-in-chief are found either. In terms of funding, both communities have a dual model, meaning they receive a dotation from the respective governments, but can supplement this with own income from commercial communications. For the new management contract of the VRT (2026-2030), the VRT is allowed to experiment more with online advertising.^[81]

Issues requiring particular scrutiny:

- **Funding issues**

In Flanders, there are no safeguards against arbitrary funding cuts. Moreover, there have been some cases where funding was presented to the VRT if they would make a tailor-made programme for the Flemish government. The issue was published in the press, and in the end, there was no funding granted (as far as we could verify). Despite this, we found no evidence that state authorities have been interfering with the Flemish broadcaster's editorial agenda on a structural level. In the French speaking part, in July 2025 the government of the Wallonia-Brussels Federation (FWB) approved an amendment of the management contract of the RTBF, whereby it provides a "refocus on its fundamental missions".^[82] The amendment to the management contract formalizes the non-indexing and removal of the additional 2% for the classic allocation of the RTBF, as well as the non-indexing of the financial participation of the RTBF to TV5 Monde. The RTBF said in a statement that the freezing of the annual allocation resulted in a loss of 133 million euros in four years. This measure of economy was included in the Community Policy Declaration of the MR-Engagés coalition. To adapt to this new budgetary reality, the RTBF has drawn up a savings plan.^[83]

Recommendations for Political Independence

For the State

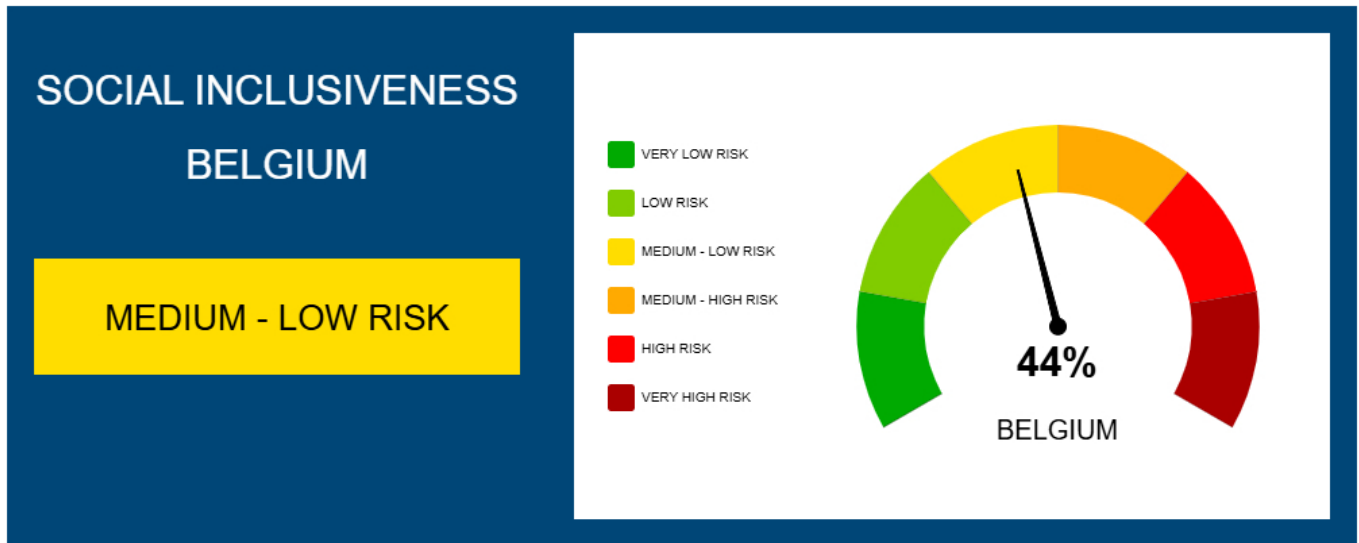
- Extending electoral legislation and regulations on electoral campaigning to include transparency on the techniques and data used during online political campaigns
- When assigning PSM budgets, establish objective pre-defined economic criteria which account for possible distortions of market competition, to complement other criteria for a fair quantification of the budget
- Embed safeguards for political independence such as codes of conduct and editorial statutes more formally in solid rules
- To guarantee transparency and accessibility of the spending for political advertising both offline and online. Strengthening reporting requirements for politicians and political parties when using online political advertising
- To define rules that ensure a fair distribution of state advertising and their full transparency
- Make editorial statutes mandatory within media organisations

For media companies

- Publish the texts of the editorial statutes as to improve transparency and accountability towards the public

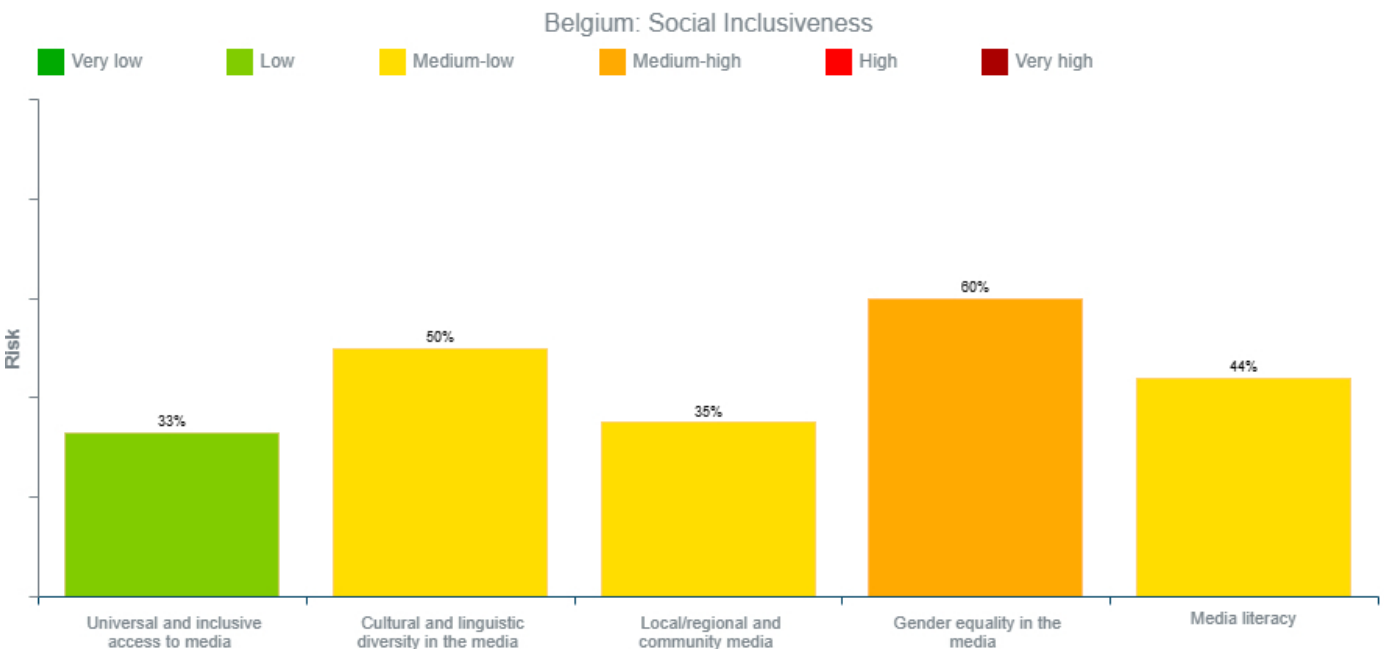
3.4. Social Inclusiveness

The Social Inclusiveness area focuses on the universal, inclusive and safe access to media, especially by specific groups in society: minorities, marginalised communities, local and regional communities, women and people with disabilities. It also examines media literacy environment, as a precondition to inclusiveness.



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In 2025, the area of **Social Inclusiveness** remains the medium-low risk zone. The most problematic is the lack of gender equality in the media. The same problems exist here as have already been identified in recent years. Local/regional media are within the low-medium risk zone. Although the supply of local news is still largely guaranteed in Belgium, there is an increasing loss of diversity and local media are facing major problems in terms of funding and advertising.



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This indicator has maintained its low risk score over previous implementations. A persistent specific concern remains regarding the high level of concentration on the market for internet access. This is still assessed as a low risk considering that the Belgian Institute for Postal Services and Telecommunications (BIPT) continues to be critical and alert of market developments and activities by market actors.

Issues requiring particular scrutiny:

- **Measures to ensure appropriate prominence**

In its recommendations for the new government agreement, Flemish media regulator recommends to take measures in order to guarantee appropriate attention, findability and visibility of broadcasting services of general interest^[84]. The Flemish government ordered a study to be carried out with regards to this matter^[85]. In its proposal to change the media decree, the Flemish government wants to introduce rules for providers of a user interface. They would need to provide appropriate prominence to certain programmes of general interest, both linear and nonlinear and on the radio. The VRM could qualify programmes as having a special impact under certain conditions. However, the proposal has not yet been approved and it is possible that some things will change in the final version.

- **Media access for people with disabilities**

Both the Flemish Community and the Wallonia-Brussels Federation have set targets for media operators regarding the accessibility of audiovisual programmes. However, there is still room for improvement. For instance, one of the stakeholders is of the opinion that Flemish Sign Language should have a more prominent place in prime time news programmes, election programmes and in emergency and crisis communication^[86]. In the French speaking Community it is media regulator CSA that is responsible for this topic. The CSA, in its report about accessibility, finds that some publishers reach or exceed their quotas in terms of suitable captioning and sign language interpretation.^[87] In the past, the CSA has fined publisher Mediawan, for not having complied with its obligation to broadcast on AB3 a minimum of 15% of its programming of fiction and documentaries in audio-described version. The fine was 50 000€^[88].

As was clarified in previous implementations, the different language communities have difficulty defining clear categories of minorities due to politically sensitive language legislation. French and Dutch speakers form a minority in some parts of the country but not in others, so that no one can generally be considered a minority. As a result, any protection of access to media for minority groups, is mostly based on general anti-

discrimination regulation^[89]. Similarly for PSM, while legal obligations to include third-party programming from certain minority groups in society have eroded, PSM still have the obligation to represent the diverse ideological and sociological groups in society in their programming.^[90]

Belgian regulation does not contain a legal definition of hate speech. However, federal law contains general provisions, defined on the basis of sex, sexual orientation, age and disability, that have been applied in the context of hate speech offences. These provisions are equally applicable in the offline and online context.

Issues requiring particular scrutiny:

- **Representation of minorities in the media**

A diversity policy can be found at the Flemish and French speaking PSM. In the previous management agreement of Flemish speaking PSM VRT, there were specific quota with regards to certain groups. These were monitored by the Flemish media regulator which publishes a yearly report on the performance of the VRT. However, in the new management contract (2026-2030), these quota have been replaced by a more vague commitment.^[91] It remains to be seen how the VRM will evaluate these changes.

The French speaking PSM RTBF does not have quota in our management contract. Our expert reconfirmed our observations of the last edition of the MPM, namely that the situation at the RTBF improves with each new management contract and it is the most active player when it comes to diversity in the media landscape. However, the situation improves very slowly. In general, the PSM performs better than the private media.

- **Enforcement of hate speech**

Belgium has a strong legal and institutional framework to address hate speech which can be found in federal legislation and are defined on the basis of sex, sexual orientation, age and disability.^[92] There are prohibitions on 'incitement to hatred, discrimination, segregation and violence'. However, its effectiveness is limited by fragmented coordination across federal and regional bodies. Enforcement is also uneven due to legal constraints, particularly the requirement for many cases to go to the Court of Assizes, which is rarely used in practice. As a result, only certain types of hate speech—such as racism—are more consistently prosecuted, while others face some legal and practical barriers, highlighting gaps and inconsistencies in the system.

LOCAL/REGIONAL AND COMMUNITY MEDIA

MEDIUM-LOW RISK

The availability of local media in Belgium is still broadly adequate, with newspapers and radio stations still present all the regions. However, the sustainability of this coverage is increasingly under strain due to significant challenges faced by the local media sector: for instance, revenues are declining and advertising budgets are shrinking. At the moment there are no real "news deserts," the issue of local diversity is starting

to emerge. In its yearly concentration report, Flemish media regulator VRM warns that local diversity is put under pressure because of financial constraints on media companies.^[94] Some direct and indirect financial support exists but is sometimes insufficient to meet the particular need and vulnerabilities of these niche media, with a very small numbers of subscribers and advertising revenues. In general, it's an ongoing debate and the evolution of local media and its impact on media plurality is in need of more research.

Issues requiring particular scrutiny:

- **Sustainability and viability issues**

Research of the VRM into local journalism shows a steady decline in the number of regional editions of national newspapers since 2018. However, the last two years there is some form of stabilization.^[95] Since the pandemic, many free local/regional newspapers also ceased publication. For instance De Streekkrant, Klakson, Steps, and Jet, are not publishing any longer due to declining advertising revenue and the impact of the pandemic.^[96] Although there are different regional newspapers, these are often part of the same media company (for instance, Het Belang van Limburg & Gazet van Antwerpen are part of media company Mediahuis). Research indicates that there has been an overall decrease in news diversity, as more news articles have been recycled across four of the seven daily newspapers, making these newspapers more similar to each other.^[97]

- **Reforms of the local media in the French speaking part**

In the French speaking part, the government announced reforms to the regulations with regards to local media.^[98] At the moment, the decree on audiovisual media services of 4 February 2021 stipulates that local media in the French Community can receive legal recognition if they fulfill several conditions.^[99] For instance, constituted as a non-profit organization or social enterprise, demonstrate financial viability through a multi-year financial plan, have their registered office and operational headquarters within their coverage area to ensure local anchoring, employ professional journalists, produce a minimum level of original programming, and guarantee editorial independence and objective information.^[100] There are 12 recognised local media outlets, which are partially funded by the government of the French speaking Community. However, the proposed changes to the decree on audiovisual media services of 4 February 2021 would create six geographical media hubs (Namur, Liège, Luxembourg, Walloon Brabant and Brussels) by January 2031. In each of these hubs, only one local media (média de proximité) would be recognised, except for the geographical regions that exceed one million inhabitants, there two local media can exist - Hainault and Liège.^[101] In practice, this would mean that there would be 8 recognised local media outlets instead of 12.

In addition, the governance would change. The proposed reform of the decree on audiovisual media services of 4 February 2021 would introduce several concrete changes to the governance structure of local media, particularly regarding the composition and leadership of their board of directors. First, the reform would limit the size of boards to a maximum of 12 members. Second, it would allow up to six members (half of the board) to be public officials or representatives of public authorities, and it would explicitly permit mayors (bourgmestres), aldermen (échevins), and presidents of social services (CPAS) to sit on the board. At the same time, the reform would remove the existing rule requiring that at least half of the board members come from the associative and cultural sector and not hold public office, which would open the governance to a broader range of actors, including the private sector. Finally, article 8 would introduce a

safeguard by expanding incompatibility rules for leadership positions, preventing certain political office holders (such as mayors, aldermen, CPAS presidents, or provincial deputies) from serving as president or vice-president of the board.^[102]

According to the government, the goal of the proposed changes is to optimize the sector by focusing resources on fewer, better-structured, and geographically coherent media outlets.^[103] These reforms are also accompanied with budgetary measures. Existing local media that merge or legally cooperate, will receive support between 2026 and 2029. For instance, local media can merge into a single legal entity or one organisation may absorb another existing local media. Each new legal structure bringing together several local media will be able to benefit from a single grant of 1.2 million euros.^[104] The government already plans to freeze the indexation of subsidies as of 2026.^[105] In addition, the government will support synergies between the PSM RTBF and the local media. These collaborations should aim to pool and streamline entire departments, such as production, direction and technical services.^[106] However, at the moment, the proposal to change the existing decree on audiovisual media services of 4 February 2021 does not contain any references to these collaborations and the government has not yet clarified how this would be regulated in practice.

Media regulator CSA has brought together members of the sector to analyse the current proposal to the changes of the decree on audiovisual media services of 4 February 2021 and to give its opinion. The sector acknowledges that reform in the sector may be necessary, but expresses concern about the reduction of the number of local media and its possible impact on media pluralism. They also oppose the planned freezing of indexation as this is a loss of predictability and an erosion of jobs, contrary to the requirements of stable, sustainable and sufficient financing laid down by European law.^[107] The CSA itself warns against re-politicization, as the current proposal of reforming local media would allow for access in particular to mayors and aldermen in the board of directors. For the CSA, these measures are considered to be violations of freedom of association and the functional independence of the media.^[108] Journalist association AJP also issued an opinion on this law proposal. They fear for the impact of the measures on both editorial independence and media pluralism as well on the predictability and stability of their funding.^[109]

GENDER EQUALITY IN THE MEDIA

MEDIUM-HIGH RISK

The management contract of the Flemish PSM VRT (2020-2025) contained quotas relating to gender equality.^[110] However, in the new management contract (2026-2030), these quotas are not present anymore. Instead there is a general commitment: “To achieve this in a more sustainable manner, VRT will focus more strongly on improving the representation of women, persons with disabilities, and persons of foreign origin in its workforce”. The Flemish media regulator VRM is responsible to monitor the VRT’s performance and it will remain to be seen how it will quantify this provision. On the contrary, in its management contract, the RTBF aims for 45% representation of women by 2025 and 50/50 parity between women and men by 2027 in news programmes and content, as well as in terms of presentation and the people interviewed or invited by RTBF.^[111]

Issues requiring particular scrutiny

- **Gender situation in private broadcasters**

Executive functions with private broadcasters remain very male dominated, but editors-in-chief for certain news media on Flemish side are more gender balanced. For instance, the general editor-in-chief (ad interim) of Flemish PSM VRT and private media television channel VTM are female. With regards to print news media second largest newspaper Het Nieuwsblad has a female editor-in-chief. In contrast. On the French speaking side, there are no female editor-in-chiefs in the main news media.

- **Underrepresentation of women media content**

Research shows that women are still underrepresented in the news, especially in evening broadcasts, but their presence has been slowly growing over the years.^[112] Women are more often seen in news reports on "softer" topics and not in elite roles.^[113]

MEDIA LITERACY

MEDIUM-LOW RISK

There were no significant developments within this indicator in 2025. There is a highly institutionalised policy in terms of media education in the French-speaking part of the country. There is a body within the Ministry, the Conseil Supérieur de l'éducation aux médias (CSEM), whose aim is to support and promote media literacy. In its public policy, the Fédération Wallonie Bruxelles deploys (finances) concrete actions; recognises operators and operations. In terms of the mandatory curriculum, in the French speaking part, media literacy is a cross-curricular subject, but there are no specific media literacy courses. There are occasional opportunities for training and tools to enable teachers to embark on media education. For example, the CSEM has brought out a 'Tronc Commun' collection because the CSEM publishes the links between expectations and media education. Media literacy appears in the Teaching Code, but it is only mentioned as a transversal expectation.

The Flemish government has made media and advertising literacy a mandatory objective for the end terms in both elementary and secondary education. The e Flemish Knowledge Centre for Media Literacy gives an overview of all these terms and the matching tools for teachers.

Issues requiring particular scrutiny:

- **Teacher's training**

In both parts of the country, media literacy is not a dedicated mandatory course in teacher training programmes, but often touched upon in broader subjects such as ICT classes. In the Flemish Community, there is the programme developed and provided by the Knowledge Centre Mediawijs, but is to be considered more as an informal training tool. In the French Community, there is training in media literacy but it is very random in the teachers' careers. In initial training, some universities organise a media education course for the teachers' education but this is not guaranteed. In higher education, the situation is the same. In the continuing education of teachers, there are media education courses in the training catalogues, but it is not

compulsory for them to follow them. In fact, it depends on how motivated the teachers are to do it.

- **Funding**

In the French speaking Community, funding with regards to media literacy is more project based making it more short-term and not long-term, which creates uncertainty for the actors active in the domain of media literacy. In Flanders, the funding seems a bit more stable. The Flemish Knowledge Center for Media Literacy functions as a network organisation that coordinates and promotes media literacy initiatives. For its mission, the Flemish Knowledge Centre for Media Literacy receives subsidies which are to be established in a new grant agreement.^[114]

Recommendations for Social Inclusiveness

Recommendations for the government

- Promote more women to management positions both in content and in representation on management level, which would result in a more balanced gender composition
- The presence of women and minority groups media should be actively stimulated, to ensure a more significant representation that accurately reflects their societal influence.
- Streamlining and monitoring of both PSM and commercial media actor efforts to ensure access to media for individuals with a physical or sensory impairment in an inclusive and comprehensive manner, i.e. to ensure the measures' pertinence and effectivity
- Provide media literacy training for teachers in the curriculum
- Provide subsidies for local and community media, with transparent and objective attribution criteria, with special attention to press media
- Provide funding for research into the viability of local media and possible options to improve local presence. In addition, funding to investigate if the current media landscape (both private and PSM) is sufficient to fulfil the information needs of the population.

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5. Notes

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6. MPM Methodology

The Media Pluralism Monitor (MPM) is a research tool that is designed to identify potential risks to media pluralism in the Member States of the European Union and in Candidate Countries. It consists of a questionnaire of 200 variables divided into four main thematic areas - Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness - and 20 indicators. (see Table 1).

| Fundamental Protection | Market Plurality | Political Independence | Social Inclusiveness |
|---|--|---|--|
| Protection of freedom of expression | Transparency of media ownership (<i>ART. 6(1) AND 6(2) EMFA</i>) | Political independence of the media | Universal and inclusive access to the media |
| Protection of information integrity | Plurality of media providers | Editorial autonomy (<i>ART. 6(3) EMFA AND EC REC. (EU) 2022/1634</i>) | Cultural and linguistic diversity in the media |
| Protection of right to information | Plurality in digital markets | Integrity of political information during elections | Local/regional and community media |
| Journalistic profession, standards and protection | Media viability | State regulation of resources and support to the media sector | Gender equality in the media |
| Independence and effectiveness of the national regulatory authorities | Editorial independence from commercial and owners' influence | Independence of public service media (<i>ART. 5 EMFA</i>) | Media Literacy |

Table 1: Areas and Indicators of the Media Pluralism Monitor

The results for each thematic area and Indicator are presented on a scale from 0 to 100% and six-tier system: (1) Very low risk (Rounded score comprised between 0 % and 16% included), (2) Low risk (Rounded score comprised between 17% and 33% included), (3) Medium-low risk (Rounded score comprised between 34 % and 50% included), (4) Medium-high risk (Rounded score comprised between 51% and 66% included), (5) High risk (Rounded score comprised between 67% and 83% included), (6) Very high risk (Rounded score comprised between 84% and 100% included). With regard to the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

To carry out the national data collection, the CMPF partners with experienced, independent national researchers (See Annexe I). These answer and score the variables contained in the questionnaire developed by the CMPF and author the narrative reports. The CMPF staff reviews the work of the national experts at each stage of the implementation of the MPM, including the data collection and the national report. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.

This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2025. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, and Serbia. This project, under a preparatory action of the European

Parliament, was supported by a grant awarded by the European Commission to the Centre for Media Pluralism and Media Freedom (CMPF) at the European University Institute.

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire, based on the evaluation of the tool after its implementation, the results of previous data collection and the existence of newly available data. The results obtained for these indicators are therefore not strictly comparable with those results obtained in the previous edition of the MPM. The methodological changes are explained on the CMPF website at: <http://cmpf.eui.eu/media-pluralism-monitor/>.

ANNEXE I. COUNTRY TEAM

| First name | Last name | Position | Institution | MPM2026 CT Leader |
|------------|-----------|-----------------------------|-------------------|-------------------|
| Aleksandra | Kuczerawy | Professor | CiTIP - KU Leuven | X |
| Ellen | Wauters | Wetenschappelijk medewerker | CiTIP - KU Leuven | |

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

| First name | Last name | Position | Institution |
|------------|------------|---|--|
| Johan | Cassimon | Member Legal/Economic Research Unit | Vlaamse Regulator voor de Media (VRM) |
| Jonas | Frojmovics | Economist | Conseil Supérieur de l'Audiovisuel (CSA) |
| Jonathan | Hendrickx | Doctor of Media and Communication Studies | Vrije Universiteit Brussel (VUB) |
| Peter | Blomme | Director | Vlaamse nieuwsmedia |
| Cathérine | Anciaux | Secretary General | La Presse |
| Alejandra | Michel | Professor | UNamur |

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