# 2025 MEDIA BOARD WORK PROGRAMME

## 1. Introduction

The European Board for Media Services (the "Board" or the "Media Board") is established by article 8 of the European Media Freedom Act (EMFA) as an independent advisory body at Union level composed by media and audiovisual national regulatory authorities or bodies, replacing the previous European Regulators Group for Audiovisual Media Services (ERGA).

The aim of the Media Board is to advise and support the European Commission (EC) on matters related to media services within the Board's competence and promote the consistent and effective application of EMFA Regulation and the implementation of Audiovisual Media Services Directive (AVMSD) throughout the European Union (EU).

The Media Board has been formally set up on February 8th, 2025, bringing new responsibilities and challenges for both the Board and NRAs. It is the responsibility of the Media Board to promote cooperation among NRAs to ensure the consistent application of the legal framework.

Adapting the resources of the Media Board and the member NRAs, together with their competences, is crucial to achieve the objectives set in the EMFA. Also, the independence of the Board and the support by its Secretariat is of paramount importance to ensure an impartial decision-making and the effective enforcement of the EMFA Regulation.

To develop its competences and achieve its objectives, the Media Board leans on a Multiannual strategy for 2025-2027, and on the Annual Work Programmes. In this regard, the Work Programme is a key operational document which considers, to the greatest extent possible, the strategic priorities outlined in the Multiannual Strategy. It thus ensures that the activities programmed for the upcoming year are consistent with the long-term objectives and evolving priority areas included in the strategy.

With this aim, the Work Programme defines the Media Board's priorities for 2025 and defines an appropriate working structure to accomplish the objectives assigned to the Board by the EMFA.

In line with the Media Board's operational principles of transparency and openness, a public consultation on the draft Work Programme for 2025 has been conducted from the 20th of February until the 18th of March. In total, 46 stakeholders from 9 different countries and a wide range of activity areas (including civil society organisations, trade/business/professional associations and think tanks among others), have participated, providing valuable inputs on priorities and challenges ahead that have been

taken into consideration in the development of the final version of the 2025 Work Programme.

## 2. 2025 Priorities

In 2025, the primary focus of the Work Programme is to contribute to the effective establishment of the Media Board and to the implementation of the EMFA, providing guidance to ensure its consistent application across the EU. Additionally, the Media Board may assist the EC in developing various guidelines foreseen in the EMFA. Equally important is the work of developing criteria and processes to address the different requests for opinions from the EC and media stakeholders. Our approach will also involve addressing industry-related aspects included in the EMFA, such as audience measurement and the transparency of the media ownership information.

Moreover, the effective implementation of the EMFA Regulation will require dialogue with industry representatives and other key stakeholders. Therefore, the Board will be actively engaging with a wide range of stakeholders, as well as facilitating a structured dialogue between providers of very large online platforms, media service providers, and civil society representatives regarding the treatment of media content in the online environment.

Also, the Media Board will continue to support the implementation of the AVMSD at national level and to foster the exchange of best practices throughout the EU, particularly to face relevant and pressing challenges such as the need to protect minors in the online environment. Besides, the Media Board is looking forward to providing support and input to the EC, in the event of the revision of the AVMSD.

On the other hand, it is important to mention that the Digital Services Act (DSA), which has been applicable since 17 February 2024, complements the AVMSD by creating a safer online environment and establishing a level playing field for businesses. Thus, the Board must also continue to reflect on the interaction between the DSA and the AVMSD, especially in relation to Video-sharing Platform providers (VSPs). This would imply as well articulating an effective cooperation with the European Board for Digital Services (EBDS).

Furthermore, promoting the societal resilience and preparedness against information manipulation will remain a priority for the Media Board. Indeed, in 2025, the Media Board will participate in initiatives related to disinformation, such as the Code of Conduct on Disinformation, the promotion of media literacy and the support for journalistic content and prominence of content of general interest. It will contribute to the EC's public consultation on the European Democracy Shield and monitor its further developments. Moreover, the Media Board will contribute to the effective implementation of the Transparency and Targeting of Political Advertisement (TTPA) by supporting national regulators in building the necessary capacities for its enforcement.

The 2025 Work Programme of the Media Board aims at strengthening cooperation among the Board's members and fostering engagement with key stakeholders in the media market, through the new consultation mechanism established in EMFA, as well as with other sectoral cooperation networks.

Finally, a thorough analysis of the relevant environment for the Media Board cannot overlook technological challenges such as Artificial Intelligence (AI) and new media trends in areas like, e.g., advertising, audiences' behaviour and the need to value digital content which are areas considered in the 2025 Work Programme.

## 3. Organization of the work

Building on the know-how developed by ERGA over the years, the Media Board is to rely on work groups to implement its 2025 Work Programme. In doing so, it is important to find the right balance between adapting the work structure to the evolving regulatory framework, the Media Board priorities and ensuring the continuity of the work and the stability of the work groups over the time.

In this regard, the 2025 priorities will be implemented through the following organisational structure:

### Work group 1: Audiovisual Media Matters

This work group will focus on promoting the exchange of best practices among the Media Board members on the application of several provisions of the AVMSD. This collaborative effort could provide valuable insights in case the EC decides to initiative the revision of the AVMSD.

Work group 1 has the following workstreams:

- **Promotion of European Works:** building on insights from the latest EC study on the promotion of European works by audiovisual media services (2020-2021) and the work initiated by ERGA in 2023 and continued in 2024 WG1 1 will continue to focus on the promotion of European works, including the definition of European works and monitoring of financial contributions to identify challenges and best practices in the implementation of the directive.
- **Minors' protection:** this workstream will build on ERGA's work in 2024 on age verification tools, criteria for content flagging and parental control. Furthermore, it will delve into harmful content identification and will participate in the EC consultations on the guidelines on protection of minors online under the Digital Services Act.
- **Influencers:** sharing best practices in the regulation, application, and enforcement of the legal framework for influencers will be a central objective of this workstream, aiming to promote a harmonized approach. Self-regulation and co-regulation initiatives may also be considered. It may also seek to provide valuable input to the forthcoming Digital Fairness Act, aiming to provide input on issues where media services intersect with consumer protection.
- **Input for the evaluation of the AVMSD by the EC:** this workstream may investigate other aspects of the AVMSD not covered by the other work streams or work groups to identify implementation challenges and opportunities for improvement. This could help the Media Board provide comprehensive feedback for the Commissions' evaluation of the AVMSD, and if needed, contribute to the future position of the Media Board regarding the eventual revision of the AVMSD.

## Work group 2: EMFA: Pluralism and media markets

This work group will provide substantive guidance on key aspects for the implementation of EMFA, which will be crucial for fostering harmonized practices and a consistent approach to media regulation.

Work group 2 has the following workstreams:

- **Media market concentrations:** this workstream will propose an "internal guidance" on concentrations, facilitating a first common understanding of the concept of a media market concentration "*likely to affect the functioning of the internal market for media services*" pursuant to articles 22(4) and 23(1) of EMFA. It is meant to be a baseline for the first opinions and will be, if needed, amended and updated at a later stage, with the evolution of practice on the matter. The online environment's impact will of course be considered in the internal discussions on this matter. These activities will be a key priority from the moment the Media Board is established, in order for the Board to be ready for the entry into application of the relevant dispositions (Art. 22 and 23 of the EMFA will be applicable from August 2025).
- **Ownership database:** Article 6 (2) of the EMFA states that national regulatory authorities, bodies or other competent authorities will develop a national media ownership database containing the information set out in Article 6 paragraph 1 (made accessible by media service providers). This workstream will focus on developing and fostering the exchange of best practices among Media Board's members on this matter.
- **National measures affecting media services providers:** this workstream will propose an "internal guidance" on national measures, in order to facilitate a first common understanding of the concept of a regulatory or administrative measure "*likely to significantly affect the operation of media service providers in the internal market*" pursuant to article 21(4) of EMFA. These activities will be a key priority from the moment the Media Board is established, for the Board to be ready for the entry into application of the relevant disposition (Art. 21 of the EMFA will be applicable from August 2025).
- **EMFA's application monitoring and development of operational guidelines**: this workstream will cover EMFA implementation related challenges and follow-up on the competences and resources allocated to NRAs members of the Media Board. Also, it will draft additional operational guidelines, in order, where appropriate, to clarify and/or provide more details regarding certain aspects of the Media Board's internal functioning. Also, in case the Media Board is consulted by the EC on its draft key performance indicators for the selection of researchers for the monitoring exercise, pursuant to art.26(3) of EMFA, work group 2 will prepare the required input of the Media Board.

Moreover, work group 2 will set up, when necessary, an ad hoc expert group responsible for leading the preparation of the opinions of the Media Board as per Articles 21 (4), 22 (5), 23 (1) of the EMFA; also, it will provide inputs to the EC in case it decides to issue guidelines as per Art. 16 (2b) and Art. 22 (3) of the EMFA.

## Work group 3: EMFA: Media business environment

This work group will focus on key areas of the EMFA affecting the media service providers' business environment. Issues such as audience measurement, the so-called media privilege, and the customisation of media offers have been consistently highlighted by stakeholders as particularly relevant, both from an economic perspective and for their implications on media pluralism. These concerns will guide the priorities and activities of Work Group 3 throughout 2025.

Work group 3 has the following workstreams:

- **Audience measurement:** as per Article 24 (5) of the EMFA, the Media Board will foster the exchange of best practices related to the deployment of audience measurement systems through a regular dialogue with representatives of: regulatory authorities or bodies, providers of audience measurement systems, media service providers, providers of online platforms and other interested parties. This workstream will lead this dialogue, which will be central to develop Media Board's know-how in this area. Audience measurement related activities will be a key priority from the moment the Media Board is established, for the Board to be ready for the entry into application of the relevant provision (Art. 24 of the EMFA will be applicable from August 2025).
- **Media content on VLOPs and Structured dialogue:** this workstream will be establishing the basis and procedures for the structured dialogue as outlined in Article 19 (1) of the EMFA, in relation to the treatment of media content by very large online platforms foreseen in Art. 18 of the EMFA. The dialogue shall include very large online platforms, representatives of media service providers and representatives of civil society the aim being to discuss experiences/ and best practices in the application of Article 18 of this Regulation, to foster access to diverse offers of independent media on very large online platforms and to monitor adherence to self-regulatory initiatives aimed at protecting society from harmful content.
- **Customisation of the media offer:** the obligation for the Board to foster cooperation outlined in Article 20(5) of the EMFA will not come into effect until August 2027. However, this workstream will aim to understand the views and positions of the various stakeholders and the difficulties connected to the implementation of the provisions on customization of the media offer to assist the EC when required and build the relevant knowledge in this area.

## Work group 4: Evolution of the media regulatory framework

Work Group 4 will focus on monitoring and analysing the ongoing evolution of the EU media regulatory framework, with a particular focus on the legal interplay between the sector's main legislative instruments. The group will provide in-depth legal analysis, promote institutional coordination, and contribute to future policy developments, including a potential revision of the AVMSD.

Work group 4 has the following workstreams:

- **Ex-post evaluation of the Audiovisual Media Services Directive:** this workstream will assess a smooth interaction between the AVMSD's content-approach in comparison to the systemic approach of the DSA. It will build 1/ on the internal analysis of the ex-ante regulation added value 2/ the identified challenges in cross-border enforcement of the AVMSD and 3/ the assessment of whether the AVMSD is fit for purpose to ensure a democratic media order in Europe. This will be done under close cooperation with work group 1 which would be leading the preparation of inputs from the Media Board
- **Cooperation between the Media Board and the European Board of Digital Services (EBDS)**: given the scope of application of the EMFA, the AVMSD and the DSA, an effective cooperation and coordination between the two Boards is necessary to ensure the development of the objectives of the three legal texts. This workstream will foster cooperation and will develop the processes and frameworks required in this matter.
- **Other legal developments, including AI**: the media market is evolving rapidly, new technologies emerge, notably AI. The purpose of this workstream is to follow-up the developments of the media sector legal framework (including the AI-Act and the Digital Networks Act) and to monitor the possible implications for the audiovisual field. Also, this work group will set up, when necessary, an ad hoc expert group responsible for leading the preparation of the Media Board's opinions pursuant to AVMSD as per Article 13 (1c) and coordinating these activities with work group 1 when relevant.

## Work group 5: Integrity of the information space

This work group will take a comprehensive approach addressing the phenomenon of disinformation by tackling it from different perspectives.

Work group 5 has the following workstreams:

- **Code of Conduct on Disinformation and disinformation cooperation:** The Media Board will carry-on its engagement in the Permanent Task Force foreseen in the Code, in particular in the development of monitoring methodologies, the fostering of cooperation with relevant stakeholders, and the continuous exchange of best practices. Also, this workstream will lead the cooperation with other bodies and entities on disinformation and will foster the exchange of experiences and best practices with them.
- **Prominence of the content of general interest**: ensuring free and accurate information access is fundamental to countering disinformation. Article 16 (2a) of the EMFA states that the Media Board shall assist the EC in developing guidelines on the prominence of audiovisual media services of general interest. Also, this workstream will build on NRAs' experience in the promotion of general interest content to define best practices, assess the effectiveness of the implemented measures and identify different approaches to general interest content definition and to implications in interface designs. Bearing also in mind the connection of this area of work with the right to customisation (art. 20) and the media privilege (art. 18) foreseen in the EMFA.
- **Media literacy**: the purpose of this workstream is to comply with Article 13 (o) of the EMFA, according to which, the Media Board shall exchange experience and

best practices on media literacy and shall foster the development and use of effective measures and tools to strengthen media literacy. To do so, the Media Board will build on the experience and knowledge developed by ERGA and other entities to develop real added value activities and inputs for NRAs.

- **Implementation of the TTPA Regulation**: the aim of this workstream is to ensure that NRAs are fully prepared to apply the TTPA Regulation, with most of its provisions coming into effect in October 2025. This includes building capacity within NRAs, providing practical tools and exchanging best practices. Additionally, this workstream will provide crucial support to the EC in developing the guidelines outlined in the Regulation, reinforcing the Media Board's role as a key partner in shaping effective, harmonized regulatory practices across the EU.

Moreover, this work group will support the EC in case it decides to issue guidelines on the prominence of content of general interest as per Art. 16 (2a).

## Work group 6: Internal and external cooperation

This work group will focus on enhancing the cooperation among the Media Board's members and on promoting the cooperation with media market stakeholders. This work group on cooperation does not hold an exclusive mandate over internal and external collaboration. Other groups are equally empowered to engage in external dialogue as needed.

Work group 6 has the following workstreams:

- **Structured cooperation and requests for enforcement of obligations of video-sharing platform providers**: this workstream aims to establish the minimum arrangements for the functioning of the relevant cooperation mechanisms under Article 14 and 15 of the EMFA. For doing so, this workstream will build on the experience gathered by ERGA in applying its Memorandum of Understanding Also, it will organise the Media Board's mediation when no agreement is reached among its members on enforcement requests of the obligations of video-sharing platforms under Article 28b (1-3) of the AVMSD, as per Article 15 (3) of the EMFA. Similarly, it will explore ways to facilitate cooperation in case no agreement is reached under the structured cooperation in Article 14 and the article 15(3) of EMFA, notably through opinions.
- **Consultation mechanism**: as per Article 12(1) of the EMFA, when the Media Board considers matters beyond the audiovisual media sector, it shall consult representatives from the relevant media sectors operating at the EU or national level. This workstream will seek to establish a reference network in the different EU countries to implement the consultation mechanism. The primary tasks may include mapping national and EU level stakeholders and defining practical arrangements for dialogue and information exchange. It should be noted that the implementation of the consultation mechanism is intended to be horizontal, and it does not fall solely within the remit of this work stream.
- **Criteria to act on foreign media representing a grave risk of prejudice to EU citizens' public security**: this workstream will be tasked with the development of criteria to be applied by national regulatory authorities when acting on foreign

media that prejudice or present a serious and grave risk of prejudice to public security, as established in Article 17 (4) of the EMFA. These activities will be a key priority from the moment the Media Board is established, in order for the Board to be ready for the entry into application of the relevant disposition (Art. 17 of the EMFA will be applicable from May 2025).

- **Cooperation of the Media Board with other Union bodies, offices, agencies and expert/advisory groups:** The objective of this workstream would be to develop a network for regular exchange with experts from other relevant international organizations in view of further advancing the level of expertise of the Board.

Moreover, work group 6 will set up, when necessary, an ad hoc expert group responsible for drafting the opinions of the Media Board as per Articles 14 (5), 15 (3), 17 (2) of the EMFA.

## 4. Stakeholder engagement

The Media Board is committed to foster a dialogue with all relevant media stakeholders as they bring an extremely valuable knowledge and expertise. Also, the Media Board is willing to position itself as a trusted party in stakeholder dialogues and to continue its engagement with the EU institutions, particularly the EC.

## 5. Communication and transparency

Implementing a communication programme is crucial for the Media Board to effectively engage with the public, citizens, and stakeholders. In an increasingly complex information environment, transparency, openness, and clarity are essential to build trust and awareness about the Media Board's activities.

The Media Board will set out a structured-communication programme to foster public understanding and confidence in the Media Board's work under the direction of Media Board's Chair and the Communications Team.