



EBMS Working group 3 – 2026 Terms of Reference (ToR)

<p>Name of the Working group</p>	<p>Protection of Citizens in the Online Environment</p>
<p>WG Chair, NRA</p>	<p>Stanislav Matějka, Council for Media Services (Slovakia)</p>
<p>Summary of background</p>	<p>The Working Group 3 (WG3) builds on the longstanding work of European media regulators in the areas of protection of minors, platform supervision, media literacy and disinformation. Before the establishment of the Media Board, the European Regulators Group for Audiovisual Media Services (ERGA) developed substantial expertise on these topics, including through reports on the protection of minors¹, the supervision of vloggers² and monitoring of the Code of Practice on Disinformation³ (now the Code of Conduct). This issue is also tackled by the Media Board representatives in the context of the Code of Conduct Permanent Task Force. These activities identified practical challenges in enforcing audiovisual rules in an evolving online environment and provided a common reference framework for national regulatory approaches.</p> <p>In 2025, the Media Board continued and further developed this line of work and published several reports on topics of protection of minors⁴ and regulation of vloggers⁵. The foundations for a structured dialogue with very large online platforms (VLOPs) were also laid in 2025 as the WG3 of the Media Board developed the initial concept for this dialogue. In parallel, the Media Board contributed⁶ to the public consultation on Article 18 of the European Media Freedom Act (EMFA). The participation of Media Board members in the Permanent Task Force of the Code of Conduct on Disinformation provided further insights into self- and co- regulatory processes and their links to the broader legal framework.</p> <p>The WG3 therefore builds on a coherent and continuous body of work carried out in previous years. It also addresses the growing importance of protecting citizens in the online environment by implementing practical initiatives.</p>
<p>Working group scope and purpose</p>	<p>The overall purpose of the WG3 is to support the strategic priority of ensuring that European citizens are properly protected from illegal and harmful content, in particular online, and empowered in the information space. The WG3 will address several cross-cutting topics, including disinformation, protection of minors as well as media and information literacy.</p> <p>Where relevant, the WG3 may address related issues arising under the Digital Services Act (DSA), including through exchanges with the relevant Working group of the European Board for Digital Services on systemic risks to media freedom and pluralism, in close coordination with the Media Board Chair and the Secretariat.</p> <p>For this purpose, it is proposed for the WG3 to engage in the following workstreams:</p> <p>1. Workstream 1: Very Large Online Platforms</p> <p>Workstream 1 will focus on the role of VLOPs in relation to media content and the application of Article 18 of the EMFA. Under this Workstream the WG3 will organise the structured dialogue between providers of VLOPs, representatives of media service providers and representatives of civil society foreseen in Article 19 of the EMFA. It will</p>

¹ ERGA Archive. https://media-board.europa.eu/erga-documents_en?prefLang=sk&f%5B0%5D=document_title%3Aprotection%20of%20minors

² ERGA Archive. https://media-board.europa.eu/erga-documents_en?prefLang=sk&f%5B0%5D=document_title%3Avloggers

³ ERGA Archive. https://media-board.europa.eu/erga-documents_en?prefLang=sk&f%5B0%5D=document_title%3Adisinformation

⁴ Media Board. 2025. Report on protection of minors. https://media-board.europa.eu/document/download/5d467f71-4e69-4b62-b551-5246ca574450_en?filename=Report%20on%20Protection%20of%20Minors_0.pdf&prefLang=sk

⁵ Media Board. 2025. Report on regulation of influencers. https://media-board.europa.eu/document/download/54572e73-5f90-41bb-a5ba-85c756c90c0d_en?filename=Report%20on%20the%20regulation%20of%20influencers.pdf&prefLang=sk

⁶ Media Board. 2025. Position of the Media Board on the consultation on Article 18 of the EMFA. https://media-board.europa.eu/document/download/020e0aef-e8f5-44b9-b8ef-e48da0705f5f_en?filename=Position%20of%20the%20Media%20Board%20on%20the%20consultation%20on%20Article%2018%20of%20the%20EMFA.pdf&prefLang=sk



define internal practical arrangements of this dialogue, including participation, gathering of input from stakeholders and the methods for reporting and follow up in accordance with Article 19 EMFA. The WG3 will prepare internal information document on the practical arrangements of the structured dialogue and will submit it to the Media Board for information at the first Plenary meeting of the year. Cooperation with the Secretariat and Commission services will be envisaged in the preparation of the internal practical arrangements.

The structured dialogue is expected to take place in the last quarter of the year. In accordance with Article 19 of the EMFA, the structured dialogue will discuss experience and best practices in the application of Article 18 of the EMFA, foster access to diverse offerings of independent media on VLOPs and monitor adherence to self-regulatory initiatives which aim to protect users from harmful content, including disinformation and foreign information manipulation and interference (such as the Code of Conduct).

In the preparation for the organisation of the structured dialogue, the WG3 will gather input on how provisions of Article 18 of the EMFA are applied in practice across VLOPs and jurisdictions. To support the input gathering, under this Workstream the WG3 will cooperate with WG4 WS4, and will collect information from Media Board members, media service providers, platforms, researchers and civil society on the topics of the structured dialogue as per Article 19 of the EMFA. The collection of input prior to the structured dialogue will support the adequate preparation of the process ahead of the dialogue. The WG3 will analyse the collected input, identify key priorities for the discussion and prepare an internal background paper to support the organisation of the structured dialogue.

By the second Plenary, the WG3 will prepare a report on the results of the structured dialogue in accordance with Article 19(2) EMFA, including main findings, commitments and possible follow up actions. This report will be shared with the European Commission and, where possible, made publicly available.

Optionally, Workstream 1 will develop an internal guidance to support the preparation of Media Board opinions pursuant to Article 18 of the EMFA. This short internal document will allow for internal alignment and provide a first guidance for the development of the Media Board's opinions by the Ad Hoc Expert Groups (AHEG). This internal guidance 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. Cooperation with the Secretariat and Commission services will be envisaged in the development and possible adoption of the internal guidance. The WG3 will also coordinate the call for experts to participate in the AHEG, which will deal with requests for opinions under Article 18 of the EMFA. Throughout the year, WG3 will remain ready to coordinate the preparation of such opinions.

After the publication of the European Commission's guidelines related to Article 18 of the EMFA, the WG3 will promote those guidelines toward relevant stakeholders, in cooperation with WG4 and the Communications Group.

The Media Board has been extensively working on the issue of manipulation of the information space for the past years. Particularly, it contributed to debates leading to the Strengthened Code of Practice on Disinformation by identifying "notions of disinformation" in 2020.⁷ Six years after this exercise, with the Code of Conduct transforming into co-regulatory instrument under the DSA and a continuing debate on disinformation as well as manipulation of the information space, the Media Board will update its analysis and positioning towards information manipulation by re-assessing the issue within a concise updated paper dedicated to map-out dangers posed by information manipulation and analysing options for countering such threats effectively. Relevant findings from this deliverable can feed into the preparation of the structured dialogue and support the external representation of the Media Board in the Code of Conduct Permanent Task Force.

2. Workstream 2: Protection of minors online

⁷ ERGA Archive. https://media-board.europa.eu/document/download/00eeb7c2-1abc-443f-9ead-f103b6b577f0_en?filename=ERGA-SG2-Report-2020-Notions-of-disinformation-and-related-concepts-final.pdf&prefLang=sk



Workstream 2 will lead a common supervisory action⁸ on the protection of minors in the online environment, for example in the context of vloggers' compliance with the Audiovisual Media Services Directive (AVMSD) rules. In addition to protection of minors, the scope of topics could include, in line with the key issues highlighted in the 2025 Media Board report on influencers⁹, advertising transparency, restrictions on promoting harmful products or services such as alcohol, tobacco, and medicines, or hate speech.

The work will start by setting the scene - consolidating existing findings from previous ERGA and Media Board reports, identifying regulatory challenges and mapping relevant legal provisions at Union and national level.

Workstream 2 will then explore the feasibility constraints and added value of such a coordinated action, taking into account previous work carried out by ERGA and the Media Board.

The specific topic which the common supervisory action will monitor (focusing on harmonised rules under AVMSD, e.g. protection of minors and commercial communication) will be defined by WG3 members at the beginning of the year, fostering inclusivity by collecting on the basis of concrete proposals from members.

Following the definition of the topic, WG3 will launch a call for interest to identify NRAs willing to actively participate in the common supervisory action by carrying out monitoring and data gathering at national level. The monitoring and data gathering will follow a commonly agreed methodology, developed by participating NRAs and adaptable to national specificities. By the end of the second quarter, the Workstream 2 will also identify training needs, tools and support participating regulators in using the agreed methodology. Beginning from June 2026, participating regulators will collect cases and data during the determined monitoring period, applying the unified methodology while respecting their national competences and specificities. All collected data and cases from participating NRAs will be submitted to the WG3 Chair's team, which will consolidate the inputs and proceed with the analysis.

On the basis of the collected results, Workstream 2 will prepare a joint report, that will synthesise the findings, highlight common patterns and challenges, and identify good practices and areas where further guidance or legal clarification may be needed. The final report will be submitted to the Media Board for approval by the end of the year.

The results of the common supervisory action will be shared with the European Commission and made publicly available. Relevant findings of the common supervisory action could feed into the broader discussions on the evolution of the regulatory framework, including any future legal developments and the evaluation and revision of the Audiovisual Media Services Directive (AVMSD) and consultation on the Digital Fairness Act (DFA) taking place in the WG1.

Finally, building on the work carried out by WG 1 in 2025, WG3 will organise a workshop under Workstream 2 with relevant stakeholders, focusing on exploring the recommendations from the 2025 Protection of Minors report¹⁰ in practice, such as the European repository of indicators and descriptors and the voluntary tailor made solutions (allowing the use of different country's content classification system). The objective of a workshop will be to discuss the practical application of the recommendations and to share best practices with Media Board members and other relevant stakeholders. Furthermore, based on the outcome of the workshop, a concrete proposal may emerge in context of AVMSD evaluation.

Throughout both workstreams, the WG3 will ensure close coordination with other Media Board Working groups and relevant stakeholders.

⁸ By common supervisory action, we refer to a coordinated activity of the Media Board members to monitor compliance with harmonized rules across the jurisdictions of the NRAs. The purpose of such an action is to assess the state of compliance with these rules at the national level, resulting in a report containing aggregated data, conclusions, and recommendations for the EU level. A common supervisory action requires a shared methodology, including the definition of the monitoring period, the selection of samples, the subjects to be monitored, tools, and the specific rules to be examined. In this case, we envisage the action would take the form of coordinated monitoring of vloggers as AVMS providers and their compliance with harmonized AVMSD rules.

⁹ Media Board. 2025. The regulation of influencers. https://media-board.europa.eu/document/download/54572e73-5f90-41bb-a5ba-85c756c90c0d_en?filename=Report%20on%20the%20regulation%20of%20influencers.pdf

¹⁰ Media Board. 2025. Report on protection of minors. https://media-board.europa.eu/document/download/5d467f71-4e69-4b62-b551-5246ca574450_en?filename=Report%20on%20Protection%20of%20Minors_0.pdf&prefLang=sk



Working group Deliverables

WORKSTREAM 1 - Very Large Online Platforms		
Deliverable 1 (Optional)	Deliverable type	Internal document
	Deliverable title	Internal guidance on practical arrangements of opinions pursuant to the Article 18 of the EMFA
	Due date	June 2026
	Approval procedure	Plenary
	Publication	No
Deliverable 2	Deliverable type	Internal document
	Deliverable title	Information paper: Practical arrangements for organisation of the structured dialogue
	Due date	June 2026
	Approval procedure	Plenary (for information)
	Publication	No
Deliverable 3	Deliverable type	Structured dialogue and report for the Commission on results
	Deliverable title	Structured dialogue
	Due date	November 2026 / 2 nd Plenary
	Approval procedure	Plenary (for the report)
	Publication	Yes, where possible
Deliverable 4	Deliverable type	Report
	Deliverable title	Notions of manipulation in the information space / Analysis of the implementation of the Code of Conduct on Disinformation
	Due date	December 2026
	Approval procedure	Plenary
	Publication	Yes



WORKSTREAM 2 – Protection of minors online

Deliverable 1	Deliverable type	Workshop
	Deliverable title	Exploring the recommendations from the protection of minors 2025 report in practice
	Due date	September 2026
	Approval procedure	No
	Publication	N/A
Deliverable 2	Deliverable type	Report
	Deliverable title	Results of the Media Board common supervisory action
	Due date	December 2026
	Approval procedure	Plenary
	Publication	Yes





Participation by Media Board members / observers

Drafters Members Observers	<u>Chair:</u> Council for Media Services (SK)
List of drafters <i>To be filled in after the adoption, based on the call for expressions of interest for participations in the Working group.</i>	
List of members <i>To be filled in after the adoption, based on the call for expressions of interest for participations in the Working group.</i>	
List of Observers <i>To be filled in after the adoption, based on the call for expressions of interest for participations in the Working group.</i>	