



**WG6-WS1 – REPORT ON THE PERFORMANCE AND APPLICATION OF  
THE STRUCTURED COOPERATION MECHANISMS IN 2025**

**April 2026**

## Executive summary

The year 2025 marked a transition from the voluntary Memorandum of Understanding (MoU), operational until April 2025, to the new structured cooperation framework under Articles 14 and 15 of the European Media Freedom Act (EMFA), which entered into application in May 2025. This shift introduced a legally grounded system for cross-border cooperation and convergence, building on four years of practical experience accumulated as part of the work of the European Regulators Group for Audiovisual Media Services (ERGA) and the MoU. The first months since the entry into application of these EMFA provisions indicate that national regulatory authorities (NRAs) adapted quickly to the new requirements and that structured cooperation began functioning as intended.

From 2025 (January – April) under the MoU, NRAs submitted **27 requests**, the majority of which were requests for assistance (RFA). Cooperation was used by **13 NRAs**, with **protection of minors** emerging as the dominant topic and **TV services** remaining the most frequently addressed service type. With the entry into application of structured cooperation in May 2025, NRAs submitted **40 requests** under the EMFA framework, with a majority focus on RFAs. The number of NRAs initiating requests **increased to 15 NRAs**, and early data suggests a shift in case types, including a growing number of requests concerning video sharing platforms (VSP) related obligations as well as requests for information (RFIs) seeking clarification from other NRAs on the practical implementation of EMFA requirements.

To support immediate operational readiness, NRAs agreed on a minimum viable product (as explained below in section 2.1.) consisting of an updated standard request form and an EU Survey template for RFIs addressed to multiple NRAs. These tools, together with a joint training session on Wednesday 25<sup>th</sup> June, established a uniform baseline for practical implementation of Articles 14 and 15. A set of Standards of Work and regular newsletters for the Media Board members further supported transparency, consistency and alignment during the transition period.

The first months of structured cooperation highlighted several challenges in terms of the technical systems established, including ensuring data consistency across NRAs (such as the case categorisation, completion of the cases and outcomes) and the scalability of the current technical systems. Addressing these challenges will be essential to ensure that the cooperation framework remains robust as case volumes increase.

Overall, the experience from 2025 demonstrates solid continuity and transition between the MoU and EMFA mechanisms, a high level of engagement among NRAs and positive early signals regarding the functioning of structured cooperation. The developments of this year provide a strong operational foundation for further consolidation and for the

long-term evolution of cross-border cooperation within the European media regulatory landscape.

## 1. Background: Application of Articles 14 and 15 EMFA

EMFA, in force since 7<sup>th</sup> of May 2024, is fully applicable as of 8<sup>th</sup> of August 2025 (except for provisions of Article 20 related to users' right to customise their media offering). Among other provisions, it introduces a structured EU-wide framework for cooperation among NRAs, with the objective of strengthening the internal market for media services by promoting effective, consistent and timely cross-border enforcement.

### 1.1. Articles 14 and 15 of the EMFA: Structured Cooperation and VSP-Related Requests

**Article 14** establishes a **structured cooperation mechanism** for cross-border enquiries and assistance between NRAs. It sets out the types of cases concerned (request for information or assistance), the obligations of NRAs when submitting and responding to requests and the possibility of using an **accelerated procedure** in urgent situations as well as the role of Media Board in case where the relevant authorities do not come to an agreement concerning the request.

**Article 15** complements this framework with a mechanism specifically dedicated to enforcement of obligations on **VSPs**. It defines how NRAs may request action from another NRA regarding VSP-related enforcement and outlines the escalation path via the Media Board where views diverge.

Together, Articles 14 and 15 EMFA provide a legal framework for cross-border cooperation, replacing the previously voluntary ERGA MoU with a structured and binding EU-level framework.

### 1.2. Rules of Procedure (RoP): Future Operationalisation

The EMFA, in Article 14(7) EMFA, foresees that the details on the structured cooperation shall be defined by Media Board in its RoP. The RoP<sup>1</sup>, adopted by the Media Board during its Plenary session of 11 April 2025, provide additional operational detail for the mechanisms set out in Articles 14 and 15, including procedural steps, timelines, communication channels and modalities for mediating disputes.

Articles 17 and 18 of the RoP further specify the rules and procedures governing structured cooperation and the enforcement of obligations for VSPs. In 2026, the RoP will be subject to a light-touch evaluation by the Media Board Working Group 4 and may be updated in the future to reflect the experience gained during its first years of operation.

### 1.3. Context for the 2025 Reporting Period

The year 2025 was a transition period combining two phases:

- the final months of cooperation conducted under the **MoU**, and

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<sup>1</sup> Rules of Procedure of the Media Board - [9c6bca26-5835-46cc-825b-e582f1672a99\\_en](#)

- the first months of the new **EMFA structured cooperation** framework.

As a result, this report reflects both systems within the 2025 reporting period and provides the basis for describing the operational transition in the following chapter.

## 2. Transformation to Structured Cooperation

The year 2025 marks a structural shift in cross-border regulatory cooperation. After four years of operating under the MoU, which provided a voluntary and trusted framework for day-to-day cooperation among NRAs, the formal cooperation regime under Articles 14 and 15 of the EMFA became applicable on **8<sup>th</sup> of May 2025**.

Operational experience from the MoU years, including increasing volumes of cross-border cases, the development of consistent cooperation practices and clearer patterns in enforcement needs, provided a substantive basis for this transition. The resulting framework enhances regulatory consistency across the Union while retaining practical elements that had demonstrated their value under the MoU.

### 2.1. Minimum Viable Product (MVP): Excel Form and EU Survey Tool

To enable a smooth transition of the Media Board into structured cooperation, a **minimum viable product (MVP)** was introduced at the outset of EMFA application. The MVP consists of:

- an updated **standard request form**, and
- an **EU Survey template** used for RFIs directed to multiple NRAs.

Both tools provided a clear and uniform starting point for cooperation of the Media Board members under Articles 14 and 15 of the EMFA. A joint training session held on **25<sup>th</sup> of June 2025** supported their consistent use across all NRAs.

This ensured that structured cooperation could operate immediately, while also allowing for further adjustments to address the specific needs highlighted earlier.

### 2.2. Standards of Work: A Shared Framework

A set of **Standards of Work** was introduced to support uniform and high-quality implementation of structured cooperation across the Media Board members. These Standards outline:

- the overall workflow for submitting and responding to requests,
- indicative timelines,
- use of shared tools for data collection,
- and principles to ensure transparency and consistency in cross-border cooperation.

They reflect key lessons learned during the MoU years and anchor them within a more structured framework.

### 2.3. Role of the Newsletters

During the transition year, newsletters were circulated to all NRAs to facilitate clarity and transparency. These newsletters provided:

- updates to the shared tools,
- overviews of replies to RFIs addressed to multiple NRAs,
- and consolidated “data health checks” to ensure accuracy of the cooperation database.

This continuous information flow supported a coordinated transition during the period in which NRAs moved from MoU-based cooperation to the new EMFA framework.

### 3. Statistical overview of the requests

This section presents a statistical analysis of cross-border cooperation data and is divided into two parts: the **MoU**, operational until April 2025, and the **structured cooperation** established under Articles 14 and 15 of the EMFA, which entered into force in May 2025.

#### 3.1. MoU cooperation overview from January - April 2025: volumes of requests

- 27 requests in total.
- Majority were RFAs (67%).
- Completion rate was 74%.
- 13 NRAs (41%) requested information/assistance.
- No formal mediations.

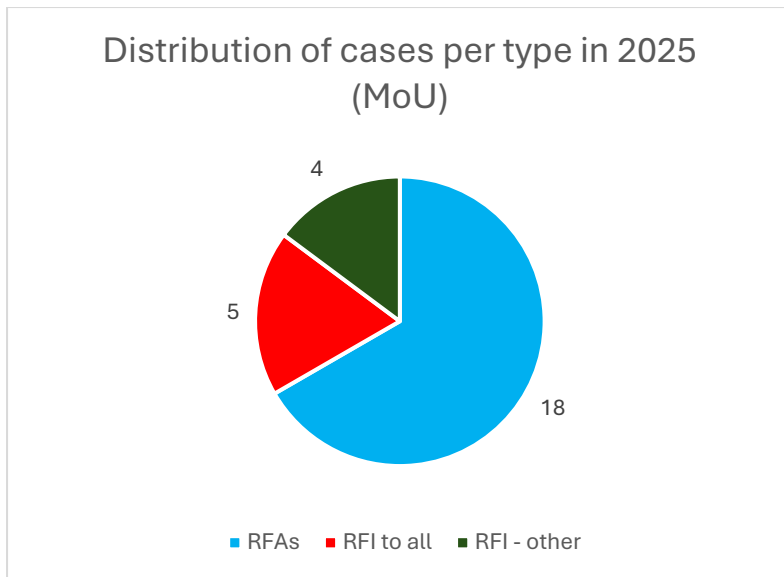
**Distribution of cases:** Of the 27 requests submitted under the MoU, the majority (18) were bilateral RFAs, with all but two focusing on the protection of minors. There were nine RFIs, of which five were RFIs addressed to all Media Board members, seeking general information on regulatory matters such as protection of minors, media plurality, and commercial communications. The remaining cases (4) were bilateral RFIs to other NRAs, concerning protection of minors and financial contributions.

**Completion rate:** Out of the 27 requests, the 20 requests were considered completed, which makes the completion rate 74%. The completion rate was 89% for RFIs and 67% for RFAs.<sup>2</sup>

**Who uses the MoU:** 13 of the 32 Media Board members used the updated standard to request information or assistance. This means that fewer than half (41%) of NRAs actively engaged in cooperation under the MoU in 2025.

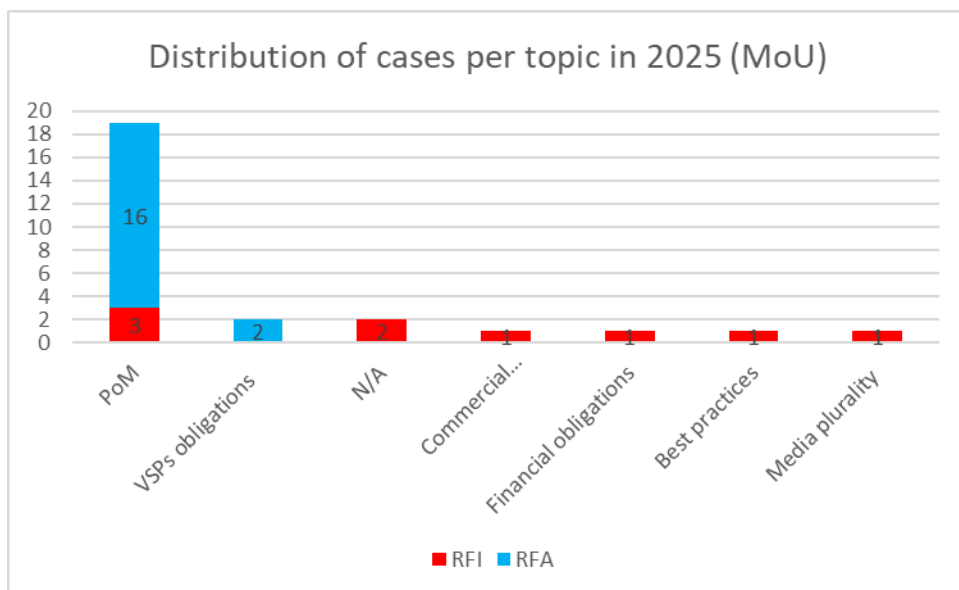
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<sup>2</sup> In the case of an RFI, the case is considered completed once the requesting authority has received the information and confirmed that it is sufficient for its purposes. Similarly, an RFA is considered completed when the requesting authority determines that the assistance provided by the requested authority adequately meets its needs.



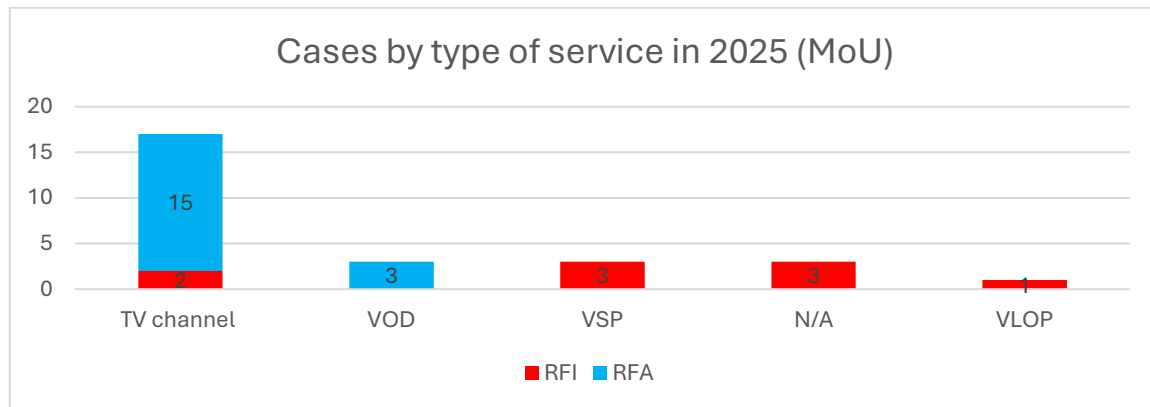
**Protection of minors as a dominant topic:** There were 19 cases related to the protection of minors among the MoU cases in 2025, most of which were submitted as RFAs. Within the protection of minors’ category, NRAs primarily sought cooperation on age ratings and pornographic websites. The ratio of cases is consistent with trends observed in previous year, indicating that it has been a core pillar of MoU cooperation before the EMFA entered into force.

This was followed by RFA cases concerning VSP obligations (2), in which NRAs requested assistance regarding the share of European works, and two cases without a specified topic. In addition, there was one case in each of the following categories: commercial communication, financial obligations, best practices, and media plurality.



**Majority TV focus:** NRAs primarily requested assistance regarding TV channels, accounting for 17 cases, or 63% of all cases. This mirrors the trend observed in 2024, where TV was also the dominant topic in cooperation requests.

Beyond broadcasting services, there were three cases in which NRAs requested information related to video on demand (VOD) and three cases requesting assistance concerning VSPs. Three cases were not linked to a single, specific type of service, and one case focused on the protection of minors on a very large online platform (VLOP).



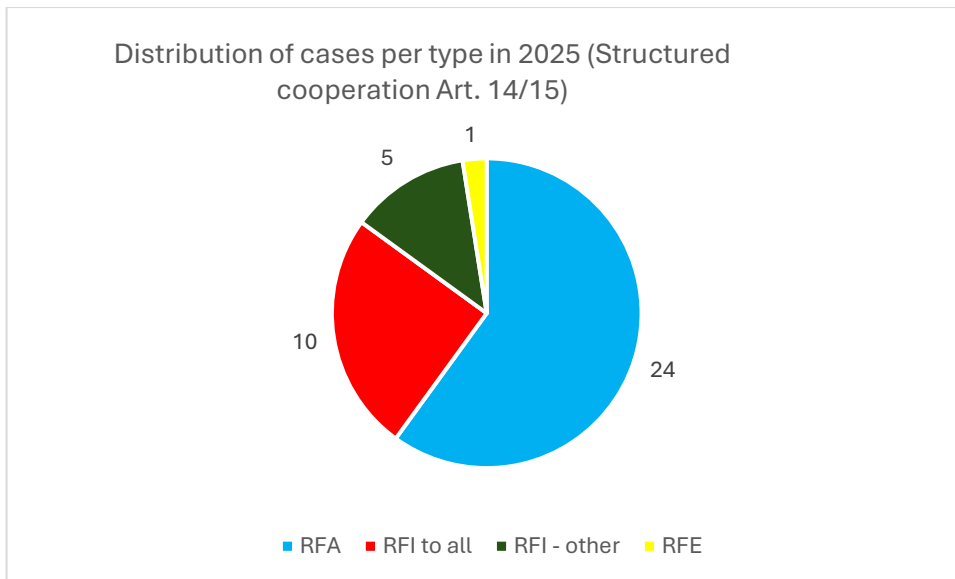
### 3.2. Structured cooperation under Articles 14/15 of EMFA: volumes of requests

- 40 requests in total.
- More RFAs (60%) than RFIs (38%) and RFEs (2%)
- Completion rate was 65%.
- 15 NRAs (47%) requested information/assistance.
- No formal mediations.

**Distribution of cases:** Following the introduction of structured cooperation, the distribution of cases was as follows: RFAs (60%) prevailing over RFIs (38%) and requests for enforcement (RFE) based on Article 15 (2%). NRAs were particularly interested in RFIs addressed to all, mainly seeking information on the implementation of the provisions of Audiovisual Media Services Directive and EMFA.

**Completion rate:** 65% of cases were completed. Several cases were requested toward the end of 2025 with due dates in early 2026. RFIs were frequently marked as completed (87%) compared to RFAs (57%). The RFE case is considered ongoing.

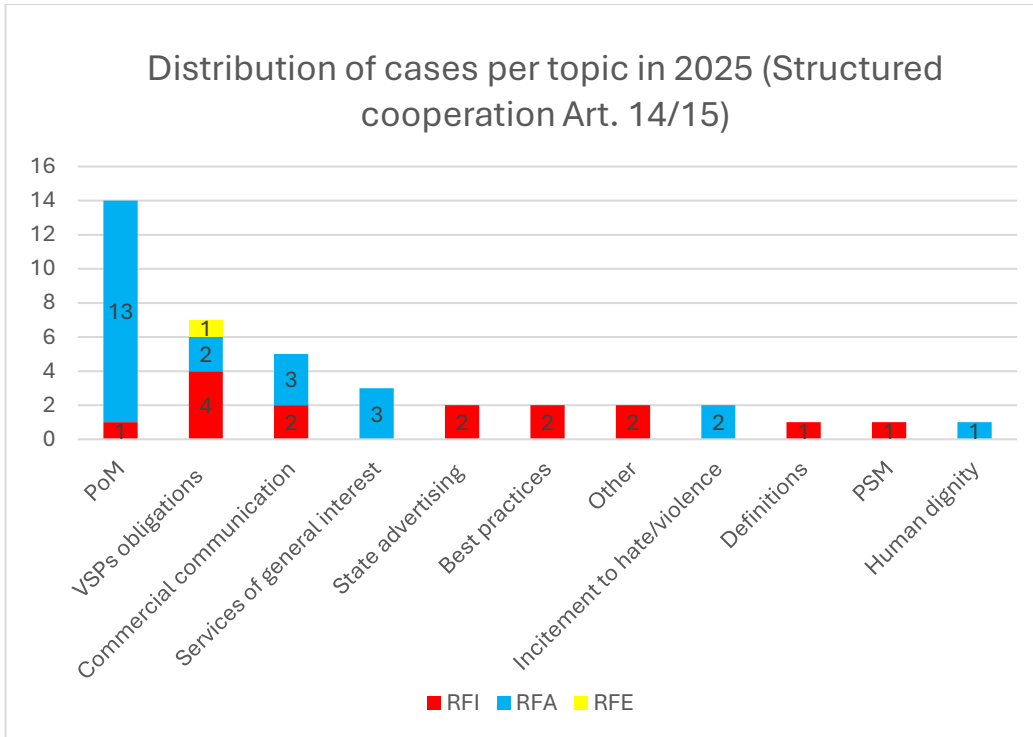
**Who uses the mechanisms:** The number of NRAs requesting information or assistance increased to 15, with nearly half (47%) making use of the standard request form.



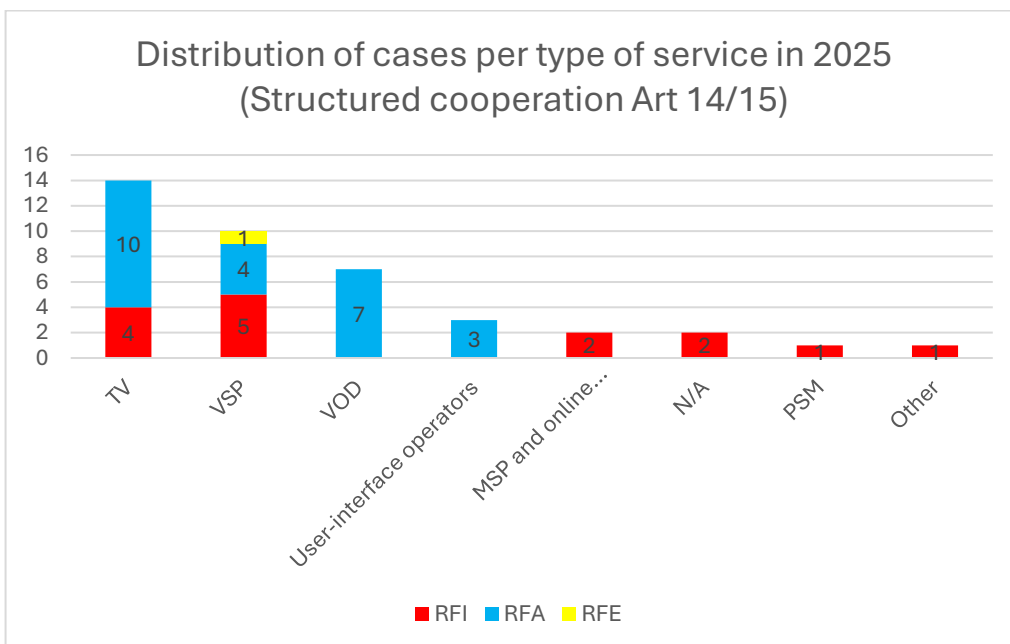
**Shift in distribution of cases toward VSP obligations:** While the protection of minors remained the dominant topic, accounting for 14 cases, there was a noticeable increase in requests related to VSP obligations, which rose to seven cases (including a request for enforcement of obligations of video-sharing platformed submitted under Article 15). Within the protection of minors category, most cases concerned cooperation on age-rating systems and harmful content.

In VSP-related cases, the primary focus was on age verification on pornographic websites, as well as on issues related to Article 18 of the EMFA and a risk assessment of the VSPs. The third most frequent category was commercial communications, with five cases mainly involving inappropriate and surreptitious advertising.

Three cases concerned services of general interest (SGI), seeking information on national SGI frameworks in other countries. In addition, two cases related to state advertising in connection with the implementation of Article 25 of the EMFA, and two cases each were recorded in the categories of best practices, “other”, and incitement to hatred or violence. Finally, definitions, public service media (PSM), and human dignity were each the subject of one request. This resulted in a total of 11 distinct topics addressed through structured cooperation in 2025.



**TV remains the main service type, followed by VSPs and VOD:** TV channels continued to be the dominant service type in assistance requests, with 14 cases accounting for 35% of all requests. Compared with the MoU period, there was a notable increase in cases involving VSPs, which rose to 10 cases (25%), and VOD services, with 7 cases (18%). Following the entry into application of the EMFA, new service categories also appeared in structured cooperation, including user-interface operators (3), media service providers and online platforms (2), and PSM (1). In addition, two cases were not linked to any particular type of service.



## 5. Looking to the future

The initial months of structured cooperation have shown that the system is functioning, but they have also highlighted several areas where further practical development within the Media Board work on the cross-border cooperation will be needed as cooperation matures. **One central challenge concerns data quality and consistency across NRAs.** While the initial data checks contributed to a shared understanding of existing case records, maintaining alignment over time will require a more systematic approach. Differences in national record-keeping, levels of detail and metadata structures may otherwise create discrepancies, which underlines the need for *clearer validation steps* and *regular review cycles*.

A second area relates to the **limitations of the current technical setup**, which was designed as a MVP for the transition phase. The reliance on Excel-based forms, manual updates and individually configured EU Surveys has worked effectively at this early stage. However, as the number and complexity of requests increases, these tools may no longer provide the level of automation, interoperability or real-time visibility that NRAs will require. *A more scalable and integrated solution* will become important as structured cooperation becomes embedded in day-to-day regulatory practice.

A third forward-looking consideration concerns the **forthcoming light-touch evaluation Rules of Procedure (RoP)** in 2026. Preparing for this development early, by mapping current workflows to anticipated updated RoP requirements, will help ensure a smooth transition from the MVP tools to a potentially more comprehensive long-term system.

Looking ahead, several steps could support the system's consolidation. **Strengthening data governance**, including through harmonised metadata, common quality criteria and predictable review points, would improve the stability of cooperation. **Developing a scalable digital solution** beyond the MVP would reduce administrative burden, improve traceability and support more consistent user experience across NRAs. At the same time, **maintaining regular cross-NRA data checks** will remain essential during the early phases, while manual processes are still in place. Finally, **early dialogue on the long-term technical architecture**, covering interoperability needs, functional requirements and expected system capacities, would ensure that future solutions reflect both practical experience and the evolving legal framework.