

# **MEETING OF NATIONAL CONTACT POINTS ON THE APPLICATION OF REGULATION ON TRANSPARENCY AND TARGETING OF POLITICAL ADVERTISING**

**8 December 2025, 10:00 – 16:00**

**Albert Borschette Conference Center, Rue Froissart 36 – Brussels**

## **MINUTES**

### **Welcome by the Commission**

**COM** welcomed (prospective) “National Contact Points” within the meaning of Regulation (EU) 2024/900 and presented the agenda. **COM** underlined the role of the Network and presented tools supporting the implementation of the Regulation (like the guidelines published in October) and ongoing actions. **COM** also presented the European Democracy Shield.

### **Roundtable discussion on the supervision and enforcement of Regulation (EU) 2024/900**

**COM** opened the tour de table and asked the Member States for feedback and updates. **COM** highlighted the importance of the National Contact Points and their Network. Member States reported on specific steps taken to support awareness raising and compliance with the Regulation, as well as on the designation of competent authorities and their coordination.

**SE** reported about several measures to support awareness raising and compliance, including stakeholder meetings with political parties, media companies and trade associations, information on their website, seminars, and a Q&A video. They set up a function for complaints. The national law that implements power and sanctions will be applicable from 1 January 2026. The Swedish Agency for the Media is National Contact Point and competent authority under Article 22 (3) and (4) and keeps record of the register of legal representatives while the Data Protection Authority is competent under Article 22 (1). There is an ongoing cooperation between relevant authorities. The Swedish Agency for the Media has received a few complaints, and also the DPA got some complaints.

**SI** reported that their national implementing act will be up for public consultation in January and will be in parliament afterwards. They already published comprehensive information online on their website and informed the Slovenian Advertising Chamber. The Ministry of Public Administration, that is also part of ECNE, presented the Regulation to the Government and to the PR-offices of the Ministries. Because of the law not being adopted yet, the Ministry of Public Administration is not fully competent as National Contact Point but it is ensuring compliance. The draft law proposes the Ministry of Public Administration as National Contact Point, and as competent authorities the Information Commission for Data Protection, the DSC for audiovisual and intermediaries, the Media inspectorate for traditional printed media, the Ministry for Interior for other political ads, jumbo posts and leaflets. An infographic for information was made available on their website.

**PT** has set up a Taskforce. However, the draft law was not presented yet.

**LT** published information on a website, as well as an explanatory guidance for stakeholders and held trainings for national and regional media and business confederations. Designated authorities are the DPA and the Electoral authority. They are coordinating with the Communication Regulatory Authority, that is part of the DSA board. A request has been submitted for one additional FTE. Complaints received came from MPs and a discussion has been going on whether MPs have to label the articles they publish in the media. Investigations are about to take place. The contact details of the National Contact Point are published on their website.

**LU** has prepared a draft law, currently under debate in parliament, which foresees ALIA (the independent authority for audiovisual media) as competent authority and National Contact Point. The DPA will be responsible for all data protection part, and the DSC has no specific mandate but will also play a role. So far, the activities are preparatory. They are informally coordinating. In cooperation with judicial authorities, they may request them to carry out investigations etc. So far, it is still an early phase, and a timeline cannot be outlined.

**HU** is still in interministerial coordination. The Cabinet of the Prime Ministers' office and the Ministry of EU affairs are working together with the National Media and Communication authority and the Electoral authority. The decision for competent authorities is still pending, and a law has not been adopted. They expressed interest in the developments in other Member States.

**NL** reported that the government is drafting an implementation law. So far, there is a ministerial degree giving competence to the Dutch Media Authority, and the DPA for Article 18 and 19. The Dutch Media Authority is meeting with stakeholders, especially from the news sector, to understand the market and its actors. Also, they planned meetings with political parties. A notification portal to inform the authority about untransparent offline and online ads was established, as well as a website with general information and a FAQ. There will be more practical guidance in the future. The DPA also published a guidance for public consultation (which was just closed). NL did not receive formal complaints yet, but informal feedback from the market, especially about Article 19. NL also reported that they had elections shortly after the entry into full application of the Regulation which was challenging but very informative.

**FR** mentioned they published a factsheet on their website and presented the Regulation to the association of mayors with CNIL – the DPA. Further meetings will be organised with self-regulatory organisations, broadcasters and television companies. A draft law was examined in November, the discussions in parliament haven't started yet but will be in the beginning of 2026. ARCOM is going to be the competent authority for Article 7-17 and 21, CNIL for Article 18 and 19. 3 additional FTEs are expected to be needed. There haven't been complaints yet. They do not have guidelines but are referring to the Commission's guidelines. The contact details can be found on their website.

**ES** stated that the Ministry of Interior, which is in charge for elections, is the provisional contact point. Already in March 2024, they published information about the Regulation

online. The process of designation is still ongoing. Currently they are analysing the best solution for the legal norm on sanctions.

**IE** is working on a communication plan to explain obligations to stakeholders, planned for 2026. They also produced a draft code of practice. The Independent Electoral Commission is the National Contact Point, the Data Protection Commissioner is responsible for Article 18 and 19, the DSC for larger platforms, the rest is up to the Electoral Commission. One additional FTE was hired so far, one more is required. The investigative function is in place since 1/11. Before, IE received little complaints but did not have the competence to investigate. Contact details can be found on their website.

**EE** explained that their law is currently pending in parliament and that the responsible committee invited the Ministry of Justice and Digital Affairs to discuss it. The DPA and the Consumer Protection and Technical Regulator Authority will be competent authorities. They had municipal elections on 19/10 and prior to that there was an increased interest from political parties/journalists. They had an information hour to give as much information as possible. The session was recorded and is available on their website. They also published a Q&A on their website.

**DE** stated that a draft bill is going through the legislative process. Several authorities will be designated, such as the DPA on state and federal level, the Media Authorities for labelling and transparency notices and the DSC, which also acts as temporary contact point, for the rest of transparency obligations. Information is published on a website and a handout for parties and NGOs was created. An external study to identify relevant market actors will be published early in 2026. So far, no complaints have been filed (but there weren't any state or federal elections). The first one will happen in the beginning of 2026.

**CZ** adopted implementation measures and published information on their website. They plan to provide written information to political parties. The main competent authority, for Article 5 to 17 and the portal on legal representatives under Article 21, is the Office for Supervision of Financing for political parties and political movement, next to the Ministry of Interior, who acting as National Contact Point and is also responsible for the publication of dates of elections and referendums under Article 26. The DPA is the competent authority for Article 18-20 and another relevant authority is the Telecommunication office as DSC. They all work independently but form a national working group. More staff will be needed but the details are still a matter of debate, depending on the 2026 budget. So far, they are still in an early stage and had elections one week before the entry into full application, but no electoral campaigns since then. So far, they received general questions but no complaints.

**BG** explained that they are currently performing a inter-regulatory analysis. Two possible contact points are the Central Electoral Commission and the Council for Electronic Media. Political advertising is so far regulated by the electoral code; for the TTPA, hence the power of the Central Electoral Commission and/or the Council of Electronic Media would need to be extended. The procedure is ongoing and they are coordinating.

**BE** explained that as flagged in the October meeting, BIPT is acting as National Contact Point on a provisional basis. Other potential competent authorities are the Media Authority

and regional media authorities. Due to the implementing law not being adopted yet, they have no official mandate and no official tasks. Some MPs are complaining about press articles being published by other political actors. They received a few requests for meetings from market players.

**COM** referred to the exemption of editorial content and explained it further.

**DK** stated that the law was revised in July and that sanctions will apply from 1/1/2026 on. They had local elections in November and published guidelines for stakeholders. The Danish Radio and Television Board is acting as National Contact Point and competent authority for everything besides Article 18 and 19. The DPA is competent authority for those Articles. They also are in informal contact with the election office. During the elections, 13 complaints were received – but none of them led to further investigation. Further resources needed are 4 FTEs and 1 additional Board Member to the Television Board, responsible for the TTPA and the European Media Freedom Act.

**SK** reached a preliminary agreement between the Council for Media Service – who is also DSC and part of the Media Board – and the Data Protection Office. The Ministry of Interior is acting as National Contact Point. A draft bill is in progress and the Government's approval is expected for March 2026. So far, interministerial coordination is taking place at both political and technical level. The Ministry of Interior is working on a website to publish information as well as the contact details. National guidance for stakeholders is in the pipeline, as well as trainings for political actors. So far, nor the Council for Media Service nor the Ministry of Interior have received complaints.

**CY** held a dedicated seminar for political parties for upcoming elections in May 2026, and additional seminars for relevant stakeholders are planned for later when the law is adopted. The Television authority will be the supervisory authority for all aspects except the ones dedicated to the DPA by the regulation itself. The Ministry of Interior is working as temporary National Contact Point. There is no role foreseen for the judicial authority. They are awaiting the implementing law, which is expected for January 2026. Formal assessments have not been made, but a staff increase will be required. CY authorities are engaging with stakeholders. There have not been complaints, only one media representative from a radio station contacted them to talk about the Regulation.

**HR** plans to publish information targeted to political actors as well as stakeholders. The bill appointing three competent authorities– the Agency for Electronic Media acting as National Contact Point, the DPA, and the Regulatory authority (also acting as DSC) – is being discussed in the Parliament. The second reading will take place in January. Furthermore, a register for legal representatives is being prepared. Until now, one additional FTE has been required. Concerning external communication, they engaged with journalists who reported incorrectly on the topic. Contact information are provided via the website of the Agency for Electronic Media. Complaints have not been received.

**RO** published information, including a press release, on their website, as well as the Commissions implementing act and guidelines. Furthermore, they answered questions from journalists. The decision for designating competent authorities is not official yet, but

expectedly the Permanent Electoral Authority will be the national contact point, also in charge of publishing information in line with Article 26 as well as registering publishers from outside the EU. Other competent authorities include the National Council for Audiovisual and the DPA. Coordination will take place via a supervisory committee with representatives from all three entities and the DSC. Additional staff is not planned for due to budget restrictions, therefore, they are reassigning employees from other departments. A new president of the Electoral Authority will start in December. On 7 December, they had local elections in Bucharest for the Mayor and the President County Council as well as for mayors in 12 municipalities. In mid-November there was a training with representatives of political parties. Most questions related to content of the transparency notice. To support compliance with the regulation, an orientation template for different types of labels and for the transparency notice was published. There is also an information guide for elections. All the relevant documents including transparency notices for all advertisers, offline and online, are published on their website.

**IE** praised RO initiative to publish templates and relevant documents on one website.

**LT** thanked everyone for sharing their updates. They already visited the Irish and Swedish websites. They asked RO to share the transparency notices with the Network.

**NL** referred to practical arrangements put in place in their country by federations of publishers to provide a website where transparency notices can be stored for online and offline advertisements. The authority is assessing if it is practical and compliant.

**IE** highlighted that having all notices in one place seems very sensible and asked whether it aligns with the Regulation. An outdoor advertiser raised concerns with them about the transparency notice hosted on the website because their website is not designed for it, and they are not seeing themselves as a publisher.

**COM** welcomed market driven compliance solutions and explained that AI tools could also be used to ease compliance. The European Repository was also referred to and closer explained. It was highlighted, that publishers need to ensure compliance. COM also mentioned that outstanding concerns based on the first months of implementation could be raised in the implementation dialogue to come in 2026. The Member States were asked to also provide their competent authorities and national contact points in writing as well as information on sanctions according to Article 25 (3).

### **Q&A on the Commission Guidelines to support for the implementation of Regulation (EU) 2024/900 on the transparency and targeting of political advertising**

**COM** addressed questions received by Member States on the guidelines in the ensuing Q&A. It focused in particular on the definition, on the concept of “in-house”, on postal services, and on obligations on different actors. COM also mentioned that the EDPB will also draft guidelines on Chapter III in 2026.

**SE** raised more precise questions on postal services and asked about ancillary services when no publisher is involved.

NL had further questions on how targeting by postal services work. They stated that they struggle with the concept of “in-house” activities and with which obligations apply when.

SI referred to example 29 of the guidelines and asked about an example for contractual agreements. SI asked about self-publishing activities by political parties and highlighted the difference between online and offline logics.

IE asked about whether logos of political parties may contain political messages. They also asked whether Christmas messages and invitations for meet-and-greets events would qualify as political ad.

COM addressed the questions and clarified that the Chapter III obligations only apply to online advertisement. The competence of EDPB and national DPAs was highlighted. Practical approaches were discussed. It was clarified that labelling is only mandatory when a publishing service is involved. The Regulation is now in full application and competent authorities are in charge of its implementation. A common approach on issues going beyond the Commission guidelines would facilitate the work of national competent authorities. Therefore, COM suggested to work together on a “complementary” common reference document, addressing questions not covered by the guidelines, to be prepared jointly with Member States, based on their input. COM would share a first list of questions before Christmas for first feedback from Member States, and then a dedicated meeting to discuss possible answers to the questions would take place in early 2026.

NL supported the idea to have such document and further asked whether in a situation in which a political party gives access to a social media account to an entity, this would be considered in-house advertising if it is not a paid service. They also asked how the requirements for sponsors, providers and publishers relate to each other and if there are overlapping requirements.

FR asked for clarifications on obligations for SMEs. IE asked details about the circulation of the list of questions.

COM addressed the questions and mentioned that a follow up email would be sent.

### **Presentation of awareness raising tools, templates and compliance tools developed in Member States**

Two invited experts presented awareness raising and compliance tools they have developed to support the compliance with the Regulation.

**CNIL** – the French Data Protection Authority – presented factsheets they prepared and reported about engagement with stakeholders (see slides attached).

**NDP Nieuwsmedia** – the Dutch trade association of news media companies – presented a compliance tool they have developed in the Netherlands ahead of the general elections of 29 October: [www.politiekereclame.nl](http://www.politiekereclame.nl). The compliance tool was created in cooperation with several trade associations (of newspapers, radio, broadcasters) and was privately funded. Publishers also cooperated with political parties to help them fill in the information.

In the ensuing Q&A session, **Member States** mostly asked questions about the NL compliance tool. In particular, SI asked details about transparency notices display, FR inquired whether there were plans to integrate additional tools such as graphics on spending by each actor, DE asked whether NDP Nieuwsmedia was in contact with political parties when setting up the websites, EE inquired about uptake by different kinds of publishers and stakeholder reactions, and finally SE asked about funding.

**NDP Nieuwsmedia** explained that this was a cross-media initiative, that the platform is being improved and that they'll make figures available to journalists. They explained they were in contact with all national political parties, which welcomed the initiatives, and explained they had had 14 000 visits in election period. Finally, as regards funding, they explained that it was split equally between the main trade associations behind it and that each association had made manpower available.

### **Upcoming joint sessions of the Network of National Contact Points and cooperation with other bodies such as the European cooperation network on elections (ECNE) the Media Board and the DSA Board**

**COM** explained the cooperation framework of the Network of National Contact Points with other networks, including ECNE, the Media Board and other bodies such as the DSA Board, provided for in the Regulation (Article 22). **COM** presented the idea to have joint sessions with such bodies as of early 2026.

**Member States** including IE and FR supported the idea. HU asked whether meetings would take place online or offline. The NL inquired if different topics would be covered in different sessions. FR flagged the added value of dialogue with the Media Board, and with the DSA Board e.g. on topics such as data access for interested entities, or the ban of political advertising by platforms, which could potentially be assessed through systemic risk assessment under DSA. BE suggested to discuss the procedure to be followed when there is an issue with political ads on online platforms i.e. in terms of cross-border cooperation.

**COM** took note of the suggestions and invited Member States to share their feedback and suggestions also in writing.

### **National training initiatives and emerging training needs**

**COM** presented the training activities put in place to support compliance with the Regulation and asked about relevant training activities performed/envisaged in Member States. **COM** explained that training activities are also important to raise awareness.

**LT** mentioned they had set up training activities for national and regional media, as well as for business confederations. They also organised a meeting with MPs to discuss the exemption for editorial content. Stakeholders and especially the media, are asking questions about labelling.

**SI** presented a training session they gave to communication offices of different ministries and explained some questions e.g. on the concept of remuneration were quite complex to address.

**RO** mentioned a training session with representatives of political parties' representatives including financial managers and as well as at collaboration agreement with the national institute for training of lawyers, which is useful because they can represent sponsors or providers.

**FR** flagged that they were preparing a webinar with the French advertising association and suggested to raise awareness among influencers.

**COM** thanked Member States for their feedback. It stressed that the guidelines provide some clarifications but that outstanding questions could be addressed in the common reference document previously discussed. It also mentioned that the Regulation provides for voluntary codes of conducts which can ensure standardisation. Finally, COM explained that as provided for in the European Democracy Shield, it will work with influencers as well.

### **AOB and conclusions**

As requested by some Member States, **COM** had a AOB point on platforms' commercial decision to stop serving paid political advertising and on the impact of some of these platforms' commercial decisions on activities which are out of the scope of the Regulation.

**SE** explained that the Swedish Election Authority would no longer be allowed to advertise on Meta's platforms about modalities of elections or "get-out-to-vote" campaigns. The Swedish Election Authority suggested that the Commission could make a list of official central election authorities from each EU country and submit it to Meta to clarify who should be allowed to advertise according to the Regulation.

**FR** flagged the importance of discussing such issue and supported the idea of Sweden.

**SI** supported COM to keep an open dialogue with platforms and mentioned problems with awareness raising campaigns from public authorities not being able to run on Meta, but also problems with ads from political parties being banned.

**DE** also flagged problems with ads from political parties being banned, together with ads from CSOs.

**COM** announced a meeting dedicated to questions to be addressed in a common reference document in early 2026, as well as joint sessions with ECNE in January, the Media Board (date tbc) and the DSA Board (date tbc). The next meeting of the Network would take place in Q1 2026.