



## AGENDA and MINUTES

### Thematic session of the European Cooperation Network on Elections on Regulation (EU) 2024/900 on the transparency and targeting of political advertising

23 July 2025

Online

#### Agenda

- 14:00            **Welcome**
- 14:05            **Commission presentation on the draft Commission Implementing Regulation on the format, template and technical specifications of the labels and transparency notices of political advertisements in accordance with Articles 11 and 12 of Regulation (EU) 2024/900**
- 14:25            **Commission support for the implementation of Regulation (EU) 2024/900 on the transparency and targeting of political advertising – presentation of the draft guidance**
- 15:55            **Conclusions and AOB**

## **Welcome by the Commission**

**COM** opened the meeting by welcoming attendees to the thematic ECNE meeting focusing on the Commission Implementing Regulation (EU) 2025/1410 of 9 July 2025 on the format, template and technical specifications of the labels and transparency notices of political advertisements in accordance with Articles 11 and 12 of Regulation (EU) 2024/900 and on the draft Guidance to support the implementation of Regulation 2024/900.

**COM** highlighted that the aim of the meeting was to inform participants about ongoing efforts to support the implementation of the Regulation on the transparency and targeting of political advertising.

### **Commission presentation on the Commission Implementing Regulation on the format, template and technical specifications of the labels and transparency notices of political advertisements in accordance with Articles 11 and 12 of Regulation (EU) 2024/900**

**COM** presented the Implementing Regulation concerning the format, template, and technical specifications of labels and transparency notices for political advertisements. **COM** highlighted that the Implementing Regulation aims to ensure uniform application of the provisions on labels and transparency notices. **COM** emphasised that by adopting a flexible approach, the act seeks to facilitate compliance. **COM** noted that in accordance with Articles 11(4) and 12(7) of Regulation (EU) 2024/900, it has adopted the implementing act by 10 July 2025.

**COM** presented the Implementing Regulation's three annexes. **COM** noted that Annex I specifies format requirements for labels and transparency notices across various media, including television, radio, print, and digital, ensuring information is prominent and easily recognised. **COM** continued by highlighting that Annex II provides templates that aid compliance and streamline information, reducing redundancy between labels and transparency notices. **COM** concluded that Annex III outlines technical specifications for transparency notices.

**LT** asked whether **COM** would provide mock-ups and visuals to aid understanding. **SE** expressed a similar request. **COM** responded that it is considering providing mock-ups.

### **Commission support for the implementation of Regulation (EU) 2024/900 on the transparency and targeting of political advertising – presentation of the draft guidance**

**COM** introduced the draft guidance prepared by the Commission to facilitate the effective implementation of the new rules under the Regulation. **COM** emphasised that the draft guidance address questions gathered through focus groups, bilateral meetings with

Member States and stakeholders, as well as public input from the "Have Your Say" Call for Evidence concluded in June. COM noted it aims to support compliance of sponsors, service providers, and publishers of political advertising, as well as competent authorities in Member States in their oversight and implementation roles.

COM highlighted that the draft guidance has been shared with National Contact Points on 4 July and released for public consultation on 14 July and is inviting feedback from Member States and stakeholders until 4 August. COM explained that this process is intended to refine the guidance before its adoption, which should in principle take place prior to the full application of the Regulation, thereby ensuring stakeholders are well-equipped for compliance.

COM highlighted that the primary objective of the guidance is to clarify critical areas, particularly around what constitutes political advertising as per Article 8(2), and transparency and due diligence obligations.

COM began the detailed presentation of the Regulation by explaining its scope. COM then detailed obligations on sponsors, providers of political advertising services and publishers.

COM stressed that the content of the guidance represents the COM's understanding of the legal provisions which is without prejudice to the interpretation of the Regulation by the Court of Justice.

LT asked whether the legislative acts or decisions of Member States for the implementation of the Regulation would be published somewhere for it to have access to. COM responded that this is a good example of what national competent authorities could share through the Network of National Contact Points.

LT inquired whether competent authorities could publish additional guidelines. COM took note of the question.

LT asked whether a Christmas greeting message paid by a candidate in a newspaper during a political campaign would constitute political advertisement. COM suggested that such cases should be assessed individually, taking into account the message content, timing, etc., thus not allowing for a generalised answer.

PT asked whether the Regulation might evolve to include other forms of political communication, such as influencers or digital forums. COM replied that the Regulation does not define political advertisement only based on the type of sponsor (e.g. a political actor) but also introduces an "issue based" definition with several cumulative criteria, which requires a case by case assessment.

COM concluded the meeting by informing participants that the next hybrid ECNE meeting will take place in the autumn and announced a new online workspace for between meetings, including for the newly and to be launched ECNE working groups.