

Media Freedom Rapid Response's contribution to the Rule of Law Report

Horizontal developments

Media Freedom Rapid Response - MFRR's flagship [Mapping Media Freedom \(MapMF\)](#), recorded 1481 press freedom violations affecting 2377 journalists and other media professionals during 2025 across the European Union member states and candidate countries. The rise in the number of alerts in 2024 and small discrepancies with the numbers in 2025 show that this has become a consistent trend. The main difference compared to 2024¹ lies in the severity of attacks, with 2025 marking [four deaths of journalists](#), compared to one in 2024. Although three of these cases occurred in Ukraine and one in Turkey, they highlight that impunity remains high, as crimes against journalists and murders often remain unsolved for years.

According to MapMF data, government and public officials were responsible for approximately one in five (21%) of all recorded incidents in EU member states during 2025. This marks a sharp increase from 2021, when such officials were implicated in just 10% of incidents.² The online environment remains the most common setting for attacks, with incidents steadily rising in recent years. In 2025, 23.5% of all recorded incidents in the EU occurred online, with spoofing, identity disguise, and deepfakes emerging as growing concerns. Intimidation and threats were the most frequent types of attacks, accounting for 19% of cases documented by the MFRR.

Another alarming trend, which surged in 2024 and persisted through 2025, is the proliferation of foreign-agent laws inspired by Russian models. These laws have raised significant concern among media organisations, with repeated threats of adoption and troubling reports emerging across both EU member states and candidate countries. MapMF recorded 72 threats of [foreign agent laws](#) in 2025, with a [rise of alerts in EU member states](#) - 34 in 2024, escalating from 20 incidents in 2024. This legislation risks silencing and exiling independent media entirely. While Hungary and Slovakia have intensified their push for these laws, similar threats from political figures have been observed in other EU countries. The spread of foreign-agent laws reflects growing illiberal influences in Europe, and the EU must firmly oppose any such proposals.

These types of threats tap into already existing legal threats, such as Strategic Lawsuit Against Public Participation (SLAPP) and criminalisation of defamation, one of the largest and most powerful tools used to intimidate journalists and media outlets. The MFRR submission and the upcoming monitoring report aim to emphasise the importance of timely and robust transposition of the Anti-SLAPP Directive by highlighting concerning cases.

Elections and protests were among the most dangerous environments for journalists in 2025. MFRR has registered 110 election-related alerts throughout the year. In terms of protests, Serbia serves as a stark example, recording the [highest number](#) of alerts last year (208), which affected 358 journalists and media workers. In April, the MFRR organised an urgent mission to Serbia to draw attention to the challenges journalists face during protests. The incidents

¹ The number of killings of journalists has been higher prior to 2024, with these numbers recorded in the MapMF - 2020: 6, 2021: 3, 2022: 10, 2023: 4, 2024: 1, 2025: 4.

https://www.mapmf.org/explorer?f.from=2020-01-01&f.eu_membership=EU+Member+States,EU+candidate+countries&f.type_of_incident=Death+%28physical+assault+resulting+in+death%29&show=list

² In 2025, government and public officials were responsible for 155 incidents translating to one in five (21%) of incidents recorded and compared to 51 cases documented for 2021 (10%).

reported there are wide-ranging, including spyware abuse, raids on newsrooms, intimidation, violence, and media capture. While most of these incidents are not directly linked to protest coverage, Serbia's case illustrates how governments are intensifying their crackdown on independent journalism amid nationwide unrest.

Last, but not least, discriminated groups remain most vulnerable to different types of attacks. Recognising that many of them go unregistered due to a distrust in official institutions, it is important to emphasise that they contribute to a general sense of insecurity among independent journalists. Thus, gendered-based attacks remain a concern, with [56 gender-based attacks](#) recorded in 2025, compared to 38 in 2024, and 16 attacks related to the [sexual orientation](#) of journalists or media workers. [Journalists in exile](#) are particularly vulnerable, and MFRR has started recording cases specifically related to them. With many cases still to map out, MapMF has registered four such cases in 2025.

This text is part of Media Freedom Rapid Response (MFRR) joint input to the Rule of Law Report, and is submitted by the following consortium members: European Centre for Press and Media Freedom, Article 19, European Federation of Journalists, Free Press Unlimited, International Press Institute, Osservatorio Balcani Caucaso Transeuropa.

Kingdom of the Netherlands (Free Press Unlimited)

III. Media pluralism and media freedom

Question

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding media pluralism and media freedom (if applicable)

5000 character(s) maximum

Recommendation (first made in 2024): Take forward the planned reform of public service media to enhance its governance and its ability to uphold journalistic standards, taking into account European standards on public service media.

Assessment of progress: No progress, slight backsliding due to proposals made which are now unclear on progress due to the government becoming defunct. The Netherlands has not taken steps to enhance the governance of public service media in line with European standards. On the contrary, the major reforms proposed in 2025 - such as dissolving NTR, reducing the number of broadcasters, and removing membership requirements - have raised concerns among experts and civil society about the potential weakening of editorial independence, diversity, and the ability of PSM to fulfil its democratic role. Even though the government proposing these measures has since fallen, it is a worrying development that these suggestions were made.

A. Media authorities and bodies

(Cf. Article 30 of Directive 2018/1808)

Question

Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies

5000 character(s) maximum

Question

Existence and functions of media councils or other self-regulatory bodies

5000 character(s) maximum

The Dutch Media and telecommunications authorities (Commissariaat voor de Media (CvdM) and Autoriteit voor Consumenten en Markten (ACM)) continue to operate as independent regulators and generally contribute effectively to safeguarding media freedom and pluralism. Their institutional independence and enforcement record are confirmed in the Media Pluralism Monitor 2025.³ The CvdM's annual Mediamonitor further strengthens transparency by providing detailed data on ownership structures and pluralism in the Dutch media market.⁴ The ACM has also demonstrated its effectiveness through recent merger assessments and conditions imposed on major media consolidations.⁵ The implementation of the European Media Freedom Act (EMFA) has begun to influence the regulatory landscape: the CvdM now participates in the newly established European Board for Media Services, and EMFA's harmonised rules on media concentration and editorial independence are gradually being integrated into national practice, as outlined in policy

³ European University Institute, Media Pluralism Monitor 2025 – Country Report: Netherlands

⁴ Commissariaat voor de Media, Mediamonitor 2024/2025.

⁵ Authority for Consumers and Markets (ACM), Merger Decisions in the Media Sector 2024–2025.

communications from the Ministry of Education, Culture and Science.⁶ However, despite these institutional strengths, both the Media Pluralism Monitor 2025 and the Netherlands Helsinki Committee's Rule of Law Report 2025 highlight persistent structural risks, particularly high levels of media ownership concentration and political pressure on public service media.⁷ Overall, while the authorities function effectively and EMFA implementation has reinforced their role, the broader media environment continues to require close monitoring to ensure pluralism is maintained.

B. Safeguards against government or political interference and transparency and concentration of media ownership

Not applicable.

C. Framework for journalists' protection, transparency and access to documents

Question

Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists

5000 character(s) maximum

For the third year in a row, an increase in the number of journalists being attacked has been recorded. Press safety monitoring organisation PersVeilig states it is a noteworthy development that there were more reports in 2025, as the number of violent demonstrations, often a cause for violence against journalists, was lower than in 2024 (a year with a high number of such demonstrations).⁸ In 2025, there were 106 threats, 67 incidents of intimidation, and 55 cases involving physical violence. Most of these occurred on the street while a journalist or photographer was working. In 86 instances, they were verbally threatened or harassed. In 2024, that number was still 'only' 68. The above totals 262 reports, against 249 in 2024 and 218 in 2023.⁹

Question

Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information)

5000 character(s) maximum

In 2025, access to information and public participation in the Netherlands faced mounting challenges despite strong legal frameworks. The implementation of the Open Government Act (WOO) remained deeply flawed, with response times to information requests far exceeding legal deadlines, limiting the ability of citizens, journalists and CSOs to engage in timely oversight and advocacy. In a parliamentary debate some motions were submitted that could further weaken the implementation of the WOO.¹⁰ While the most harmful motions were rejected, the

6 Ministry of Education, Culture and Science (OCW), Policy Communications on EMFA Implementation, 2024–2025.

7 European University Institute, Media Pluralism Monitor 2025.

8 [262 incidenten gemeld bij PersVeilig in 2025, geweld tegen journalisten neemt toe - PersVeilig](#)

9 [262 incidenten gemeld bij PersVeilig in 2025, geweld tegen journalisten neemt toe - PersVeilig](#)

10 <https://openstate.eu/nl/2025/05/maatschappelijke-organisaties-sturen-brandbrief-aan-de-kamer/>

Ministry of Interior in a letter to the ‘formateur’ who was tasked with forming a new government coalition, proposes measures to simplify and restrict the WOO.¹¹

Question

Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits
5000 character(s) maximum

In April 2024, Free Press Unlimited published a research report investigating the impact of legal pressure on Dutch journalism.¹² The research shows that increasing legal pressure on media and individual journalists in the Netherlands leads to self-censorship, and psychological and financial pressure on freelance journalists and smaller media outlets. The legal pressure was, in some cases, severe: penalty payments of tens of thousands of euros and threats to seize a journalist's house.

In October 2024, the Ministry of Justice and Security published the draft law for implementing the European anti-SLAPP Directive. The law will be discussed in Parliament in April 2026. Free Press Unlimited, together with the Dutch anti-SLAPP working group, has expressed its concerns that the proposed implementation law does not provide sufficient protection for victims of SLAPPs in the Netherlands. In some respects, the minimum standards outlined in the Directive are not met, let alone the best practices recommended by the Council of Europe.

The most pressing concerns with the Draft Implementation Act are the following:

- The definition and indicators to assess a SLAPP have not been included in the draft Act. By not including SLAPP indicators in the law, Dutch judges are given little guidance when assessing potential SLAPP cases - a significant issue given the limited case law on this topic. In the interest of legal certainty, this guidance is crucial. The criteria from the Directive introduce indicators of a SLAPP that do not align with current Dutch jurisprudence on abuse of procedural law (Article 3:13 BW), further underscoring the need to enshrine them in law.**
- With the exception of the provision on securities, the Explanatory Memorandum states that the safeguards for early dismissal and full compensation for costs as outlined in the Directive are already provided for in Dutch law. However, by not making specific safeguards available for SLAPP targets, the Draft Act does not offer effective access and hereby does not meet the minimum standards of the Directive.**
- Regarding early dismissal, the Draft Act creates a barrier to effective access to this remedy. The Explanatory Memorandum states that no legal change is needed in Dutch law because SLAPP targets can start separate summary proceedings to request the dismissal of the case. This does not align with the Directive's mandate, as this would increase the costs for SLAPP targets. A**

¹¹ <https://openstate.eu/nl/2025/12/position-paper-in-reactie-op-voorgestelde-inperking-van-de-woo/>

¹² <https://www.freepressunlimited.org/nl/actueel/onderzoek-fpu-toenemende-juridische-druk-op-nederlandse-media-wordt->

specific legal provision for (an expedited handling of) a request for early dismissal in the same procedure in cases of SLAPPs would better reflect the Directive.

- *Secondly, the effective access to the full compensation for costs is concerning as the Explanatory Memorandum states that it is already possible to recover the full costs of legal representation. However, this remedy is rarely awarded, even when courts do find abuse of process. Only statutory fees are awarded in the vast majority of cases, which is problematic as the gap between the actual costs and the awarded costs can be very large. Without a specific remedy for full compensation in SLAPP cases, there are strong concerns about the effective access to this safeguard and, therefore, compliance with the Directive.*
- *The Dutch anti-SLAPP working group has expressed these concerns in the public consultation for the proposed law. In addition to the points discussed above, the working group also raised that the draft Act solely covers cross-border cases and not domestic cases. The EU encourages member states to extend these safeguards to domestic SLAPP cases as well (in line with the Council of Europe's anti-SLAPP recommendations). As many SLAPP cases in the Netherlands lack a cross-border element, it is important that the law is applicable to domestic cases as well. In the updated Explanatory Memorandum, the government has indicated that the law must also apply to domestic cases. However, this is not yet regulated in the current text of the law itself.*

Question

Any other developments related to media pluralism and freedom - please specify 5000 character(s) maximum

Several incidents in 2025 illustrate how political rhetoric in the Netherlands increasingly challenged the credibility of independent journalism. Senior government figures publicly questioned the neutrality of public broadcasters, most notably when Vice-Prime Minister Mona Keijzer amplified online claims that the NOS was “spreading propaganda”. This prompted strong criticism from media experts and fellow cabinet members who warned that such accusations were unfounded and harmful to public trust.¹³ Keijzer also repeatedly suggested that the NOS was politically biased, leading the broadcaster's editor-in-chief to state that her accusations undermined the integrity of journalists. Over the course of one month, she posted or retweeted 12 messages with similar accusations, doubting political neutrality and quality of information.¹⁴ Media analysts described her approach as “trollenlogica” (Troll logic) and warned that such statements from senior officials erode trust in public broadcasting.¹⁵ Similar concerns arose when other political leaders characterised public broadcasting as biased or activist, contributing to a broader pattern in which journalists were portrayed as unreliable or politically motivated.¹⁶ Reporting from Dutch news outlets, but also e.g. universities,¹⁷

13 [Kabinetsleden nemen afstand van verdachtmakend X-bericht Keijzer over NOS](#);

14 [Mona Keijzer wekt toorn Kamer na aanval op NOS: 'Echt ridicuul' | Politiek | AD.nl](#)

15 [Gaait vicepremier Keijzer \(BBB\) te ver met kritiek op NOS? - DIT](#)

16 [Haagse speldenprikjes richting pers worden steeds kwaadaardiger; Kritiek mag, maar verdachtmaken van journalistiek raakt de democratie](#)

17 [Aanval op NOS door vicepremier ondermijnt de rechtsstaat - Universiteit Leiden](#)

highlighted that these statements went beyond normal political critique and risked undermining the essential democratic role of a free and independent press.¹⁸

18 [Kritiek mag, maar verdachtmaken van journalistiek raakt de democratie](#)