

Country visit Belgium – 3 March 2026

Questions – Answers VRM

<u>Meeting on:</u> • <u>Pillar III – Media pluralism and media freedom</u>	1. Last year's concerns relating to political interference in view of editorial independence of the media are still present today. On 13 January 2026, for instance, the Media Minister of the French Community was accused of making offensive remarks about public broadcaster RTBF, expressing a wish for a political shift in its leadership and criticising the new generation of journalists as largely left-leaning. - Would you consider this to be an increasing trend? - If so, is this also the case outside of the French Community? - Is the government addressing any concerns about external interference in view of editorial independence?
<u>Answer</u>	In Flanders, a yearly monitoring of the newsprograms of public sector broadcaster VRT by the university of Antwerp is an instrument that is used by VRM to examine the impartiality
	2. ...
	3. Over the last years, there has been an increasing concentration of media ownership by a limited number of actors. The Flemish media regulator's annual media concentration report indicates that for the aggregation of traditional media products, between 80 and 100% of the Flemish market remains in the hands of only five media groups. In line with this, several media stakeholders have expressed concerns in view of media concentration in Belgium. - How do you assess the increasing concentration of media ownership, and what implications does this have for media pluralism and democratic debate? - Have any measures addressing these concerns been implemented?
<u>Answer</u>	Chapter 4 of the media concentration report lists a number of action that have been undertaken, and a number of new suggestions. In the future takeovers will have to be assessed because of EMFA
	4. ...
	5. Could you share any additional media-related insights, including relevant legislative or regulatory initiatives, policy developments, or cases at the federal or regional level?

<u>Answer</u>	
Meeting with the Media Regulators (CSA, VRM and Medienrat)	1. On 15 April 2025, the case dealing with a conflict of interpretation of the "CDJ decree", which articulates the division of competences between the Conseil de déontologie journalistique (CDJ) and the Conseil supérieur de l'audiovisuel (CSA), was decided by the Council of State. The Council of State endorsed the CDJ's interpretation that, in news programmes, the CDJ's intervention on the ethical aspect of a mixed complaint (i.e. relating to an information programme and covering both a decree and an ethical provision) exhausts the CSA's jurisdiction over its decretal counterpart. a. @CSA: Could you go into more detail on the outcome of this case and the concerns that remain from your side? b. @VRM & Medienrat: Do similar issues exist in the Flemish and German-Speaking Community?
Answer:	b. VRM has no knowledge of similar issues in the Flemish community
	2. Over the last years, there has been an increasing concentration of media ownership by a limited number of actors. The Flemish media regulator's annual media concentration report indicates that for the aggregation of traditional media products, between 80 and 100% of the Flemish market remains in the hands of only five media groups. In line with this, several media stakeholders have expressed concerns in view of media concentration in Belgium. a. @VRM: Could you comment further on the results of this report? Have recent changes impacted media pluralism and the diversity of voices available to the public? b. @CSA & Medienrat: How would you assess media concentration in your respective Communities? Have there been any significant changes that could impact media pluralism and the diversity of voices available to the public? c. Have any measures addressing these concerns been implemented?
Answer:	The Flemish media landscape remains highly concentrated around a few large groups, while international platforms are simultaneously redistributing attention and revenues. This affects pluralism mainly through: • Fewer independent economic power centers • More cross-media integration • Greater dependence on distribution and platform logic

	The report explicitly notes how newsrooms and leadership structures at major players are further integrating: • DPG Media with News City • Mediahuis, including a single general editor-in-chief for Het Nieuwsblad and Gazet van Antwerpen This kind of integration could lead to more shared agendas, re-use of content, and converging perspectives. The report describes how, in television, the traditional role of broadcasters as curators/aggregators is under pressure because distributors and international players increasingly determine what is visible. This is why broadcasters are building their own platforms and why collaborations such as Streamz (local VOD platforms) exist. Pluralism is no longer only about how many channels/newspapers exist, but also about discoverability and prominence on smart TVs, set-top boxes, and platform catalogues. This also explains policy plans to make Flemish apps more prominent and/or pre-installed on smart TVs. The report signals a clear shift from linear viewing to time-shifted/connected viewing, which is changing advertising models. Advertising revenues finance local content and news. When money flows to international platforms, local players' business models come under pressure and the push for economies of scale increases. The report also mentions the strategic importance of the XMP Cross Media Panel to measure total reach cross-media, as a response to platform dominance and to increase market transparency. The digitization of radio (DAB+) expands distribution capacity, but practice shows that licensing/market design and profitability remain crucial. In the radio advertising market, the boundary between public and commercial radio is becoming blurred. Since 2024, VAR (the public broadcaster's sales house) has been selling advertising for commercial radio stations, and from 2025 also for podcasts from commercial players. This points to a stronger ecosystem logic: good for revenue stability, but it also increases entanglement in the market structure. The Flemish podcast market is professionalizing through measurement and new revenue models, but local initiatives such as Podgrond have stopped due to a lack of commercial viability. Visibility and revenues depend heavily on major platforms. The result is that there are more potential voices, but business models remain fragile. It is uncertain whether this will structurally sustain pluralism.
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	In summary: recent changes have indeed affected pluralism and diversity of voices, mainly because concentration and newsroom integration could reduce internal variation. The platformization of distribution power shifts the role of gatekeepers, and advertising pressure drives scale expansion, while podcasts/creators bring new voices but remain economically dependent.
	3. Do you consider your resources sufficient to effectively carry out your mandate?. Have the VRM, CSA, and Medienrat received (sufficient) additional (financial, human, or technological) resources in regard to new tasks? If so, could you elaborate more on which resources and how this has impacted the regulator's operational capacity and effectiveness?
Answer:	The new tasks are expected to put major strain on the workload of VRM's administration, and we therefore have pleaded for an augmentation of resources. The current budget and staff are not sufficient to comply with the new tasks. In view of the actual budgetary severeness, an augmentation of the budget to fulfil the complete needs might be doubtful.
	4. What are the most pressing challenges currently facing media regulators in the Flemish, French, and German-speaking communities?
Answer:	Regulating the media is becoming more complex: in our media concentration report we use horizontal, vertical, and cross-media concentration as analytical frameworks, but reality is shifting toward conglomerates that combine content, advertising, distribution, and platforms. Traditional market shares by individual medium are increasingly insufficient. You need to understand power positions across the entire value chain, including telcos, platforms, bundling, and more. Several major European instruments with direct impact have recently been added: the EMFA, the DSA, the DMA, the Regulation on political advertising, and the AI Act. This creates multiple challenges in terms of capacity and expertise, but above all in terms of coordination with other regulators and national authorities to enforce a level playing field. Setting up a way to organise this in a feasible and legally correct way within the Belgian constitutional context proves to be challenging. The reformed investment obligation has been extended to video-sharing platform services. Several parties are challenging this before

	the Constitutional Court, which could set an important precedent. Implementing and supervising this contribution obligation creates additional challenges for the VRM—especially regarding scope/definition and dealing with legal uncertainty—while this policy is essentially the first of its kind in Europe.
	5. Could you provide any additional media-related insights, including relevant legislative or regulatory initiatives, policy developments, or cases at the federal or regional level?
Answer:	The reformed investment obligation has been extended to video-sharing platform services. Several parties are challenging this before the Constitutional Court, which could set an important precedent. Implementing and supervising this contribution obligation creates additional challenges for the VRM—especially regarding scope/definition and dealing with legal uncertainty—while this policy is essentially the first of its kind in Europe.