

NL Country Visit (Rule of Law Report) - 19 March 2026

Anti-Corruption:

1. We note the adoption of the first **national anti-corruption policy** in June 2025. Could you explain to us how the policy is being monitored and implemented? How are the various actors involved being coordinated?

JenV: The anti-corruption policy is coordinated by the Ministries of Justice and Security and Interior and Kingdom Relations. As set out in the letter of June 2025, the policy will be further shaped and updated after the publication of the National Risk Assessment Corruption by the WODC and studies by the Strategisch Kenniscentrum Ondermijnende Criminaliteit. As these studies were only published last week, we cannot yet say which other actors may need to be involved. The Ministries of J&S and I&KR have regular meetings in which they monitor the progress of the various activities underway. These meetings will also be used to determine the follow-up to the aforementioned studies, including other possible actors to be involved. For the actors involved in the activities already underway, we refer to the letter of June 2025 (Kamerbrief over anti-corruptieaanpak | Kamerstuk | Rijksoverheid.nl).

2. Are there any reflections on the **existing legal definitions** concerning corruption in the Netherlands, in particular as regards the potential criminalisation of trading in influence?

JenV: The implementation of the EU Directive has not yet commenced. Before the legislative process of implementing the Directive has commenced, no remarks can be made on the sufficiency of existing legal definitions for the offences introduced in this Directive.

3. We note that the **FIOD specifies it faces some delays in addressing bribery investigations** “due to the recent Landeck decision which can cause delays in the investigations due to the obligated involvement of investigative judges (and the limited capacity thereof) in the assessment of material potentially subject to legal privilege”. What is the Government’s view in this regard? Will it propose any measures to assist the FIOD in this regard?

JenV: Delays in criminal proceedings caused by assessment processes for legal privilege claims is by no means an issue specific to foreign bribery cases and is therefore being addressed at large in the reform of the Dutch Code of Criminal Procedure (DCCP). Procedures for handling material subject to legal privilege are discussed in the second supplementary act (Tweede aanvullingswet), which will be published for consultation in the spring of 2026. The Landeck decision is explicitly taken into consideration in the drafting of the revisions. For more information, see the 11th progress report on the development of the DCCP: <https://open.overheid.nl/documenten/a955592d-1aed-4ec4-9be4-71c8a3d28afd/file>

4. **Revolving Doors / Post-employment restrictions:** We understand the “wet regels vervolgfuncties bewindspersonen” would officially enter into force mid-2026. Will it already apply to members of the Schoof Government that left their posts? Could you provide further details on its implementation?

BZK: It is indeed correct that de 'Wet regels integriteit en vervolgfuncties bewindspersonen' has come into force. To be precisely, the bill has come into force as from the 20th of February 2026. The legislative obligations apply for all the members of the former Governments Rutte IV and Schoof, as long as their formal resignation took place within two years prior to the effectiveness of this bill. Regarding the further implementation of the bill, I would like to emphasize that the new tasks of the Advisory Committee on the Legal Position of Ministers and State Secretaries (Dutch: Adviescollege Rechtspositie Politieke Ambtsdragers - ARPA) have come into immediate effect. This means for instance that current former ministers and state secretaries that are willing to apply for a new job or assignment within the so-called two-year cooling-off period, are obligated to send a request to the

ARPA. The advice from the ARPA will be published on their website, whenever the former minister or state secretary has accepted the job.

5. We noted in your written input that the Government plans to **update the code of conduct** for the integrity of government officials in 2026. At this stage, would you be able to share more details with us of what such as update would entail; as well as a potential timeline for adoption? How will the topic of “influence from informal networks” be included?

BZK: At the moment we are in the middle of the process of updating the code of conduct. Updates will entail for example the new law on revolving doors that came to effect February this year. With this law, the Code of Conduct now has a legal base. It has been promised in a letter to Parliament that network awareness will also be included in the code of conduct. Potential timeline for adoption is before summer this year.

6. In relation to this, are there any plans to **revise existing rules on asset declaration** (the Schoof Government had signaled plans to do this in 2027)?

BZK: Unfortunately we were eventually unable to coordinate an answer with the Ministry of General Affairs in time. The revision of the legal framework regarding financial conflicts of interest, which includes for instance real estate and shares in listed companies, is part of the responsibility of the Prime Minister, in the context of his role as the former of a new Government. This legal framework is being discussed during the meeting of the Prime Minister and the candidate ministers and state secretaries, prior to their appointment. We will provide further information in writing, around April at the latest.

7. Could you update us on the **Political Parties Act**? If possible, include in your answer the legislative proposal related to a “membership duty” [ledenplicht] for political parties. Does it remain in the Parliamentary procedure?

BZK:

- The Parliamentary procedure for the draft new Political Parties Act is ongoing. The draft new Political Parties Act was submitted to Parliament in May 2025. The government aims to submit its response to the House of Representatives in the form of a *‘Nota naar aanleiding van het verslag’* at the beginning of Q2 2026.
 - The Act introduces transparency rules on the organization of political parties. It would also incorporate the existing Act on Political Party Financing. The Act also enables the financing of local political parties.
 - The proposed Act does not contain a membership duty for political parties.
 - Members of the House of Representatives (Sneller and Tseggai) have submitted an amendment that would in principle require political parties to admit new members, except in certain limited cases.
 - The House of Representatives has asked the Council of State for advice on this amendment. This advice has not yet been published. No vote has yet taken place in the House of Representatives about this amendment.
8. **Lobbying:** We note the incoming Government has made a commitment in its coalition agreement to establish a lobby transparency register. At this stage, would you have more details on this process / the modalities?

BZK: Indeed, the new government incorporated in its coalition agreement the ambition to establish a lobbying register that is practical and manageable for lobbyists as well as government workers. It is too early to elaborate on the plans of the government for the implementation of the register. The

minister of the Interior and Kingdom Relations will debate his plans for the register with the second chamber in a parliamentary debate on the 20th of May.

9. Could you outline the main conclusions of the **National Risk Assessment on corruption**, to be presented to the public on 12 March 2026?

BZK:

- The NRA Corruption is the first National Risk Assessment in the field of Corruption in the Netherlands. In this qualitative assessment, researchers from the WODC together with experts from the public and private sectors, have created a shortlist of 13 corruption threats that have the greatest potential impact on Dutch society and for which the resilience of existing measures is relatively low. Due to the qualitative approach in which potential risks are also taken into account, it is not necessarily the case that the highest ranking threats are also the threats for which the most incidents are known. In fact, threats for which no cases have been registered at all are also included.
- The 13 corruption threats on the shortlist concern the bribing of (high level) public officials, officials from law enforcement agencies, and financial and non-financial service providers by foreign state actors, organised crime, and private sector parties.
- Regarding the resilience of existing measures, the researchers conclude that the existing body of anti-corruption measures is largely sufficient and new measures or legislation are not required, but that it is of great importance that these measures and legislation are better followed. This is particularly applicable to organisation specific (internal) anti-corruption and integrity policies.
- For details more information, please see the full report (and accompanying summaries in Dutch and English) – which has been published on March 12th – and the letter to Parliament introducing the report.

Media:

10. Besides what is already included in the information sent by you, could you share some more context and detailed information on the planned reform of public service media? And the precise status of the bill at the moment?

OCW: The reason for the proposed reform is the fact that the way in which the national public broadcaster is organized is not compatible with changes in the media landscape and Dutch society.

Currently the public broadcaster is organized into thirteen different broadcasting organizations. This fragmentation makes it hard to respond as a coherent whole to the challenging digital environment in which the public broadcaster must compete with numerous (international) media players. This is one of the reasons that the bill proposes to unite these broadcasters into four entities (plus one organization which has a clearly defined task assignment in the field of, among other things, news).

Furthermore, the four entities will have a permanent position in the public broadcasting system, as opposed to the current system which has a selection process every five years regarding which broadcasters get a public broadcasting license for the next five years.

Underlying reasoning for this proposed change is the fact that having (new) organizations being able to enter the public system every five years is a very convoluted way to ensure the system as a whole is responsive enough to society to incorporate new or changed perspectives in society in the public content it produces. Instead, we will give the four permanent entities the legal task of responding to changed needs of Dutch society.

The overarching broadcast organization, NPO, will retain its royal charter which is designated to a broadcaster every ten years and is divided into two charter periods of five years. The bill will also

introduce a new system for the public broadcaster to transparently tell the public about the plans for the charter period and the way in which they report about their results on a yearly basis.

In addition, the responsibilities of the media regulator will be clarified regarding the public broadcaster, which will strengthen its position. These measures all add up to one of the biggest proposed revisions of the national public broadcaster of the last decades.

The legislation is currently being prepared. The aim is to put the bill up for public consultation in the summer of 2026 after which the legislation will be introduced to parliament at the beginning of 2027.

11. Besides what is already included in the information sent by you, could you share some more context and detailed information on the reform of the Dutch local public media? What is the precise status of the bill aimed at strengthening local public broadcasters at the moment?

OCW: The bill to strengthen local public broadcasters will soon be submitted to Parliament. This legislative amendment will enable local public broadcasters to perform their democratic and social functions more effectively than currently is the case. It involves a coherent package of measures to strengthen the continuity and professionalism of local public broadcasters.

Following approval of the new media law by the two Dutch representative bodies, the Ministry of Education, Culture and Science aims to have the new system up and running by January 1st, 2028. From that date onwards, local broadcasters will receive their funding from central government rather than from local authorities. The government will increase the total budget by approximately 18 million euros. The number of broadcasters will be reduced to eighty, and they will serve larger areas.

12. Last year's Rule of Law report flagged that challenges related to the transparency of media ownership and the high level of media market concentration remain. How would you assess media concentration in the Netherlands? In particular, following the acquisition of RTL Nederland by DPG Media, how is media plurality being safeguarded in the Dutch media landscape? Have any early effects already been observed since the merger?

OCW: Yes, we agree that the Dutch media market is already quite concentrated. That is one of the reasons the Dutch government is currently working on legislative proposal for a new, separate assessment of media market concentrations that could have a significant impact on media pluralism and editorial independence, as the European Media Freedom Act also requires. This new assessment will take place alongside the existing test based on competition law. The Dutch Media Authority (Commissariaat voor de Media, CvdM) will have a significant (advisory) role in this new assessment.

Furthermore we would like emphasize that the Netherlands Competition Authority (Autoriteit Consument & Markt, ACM) has conducted a very thorough investigation in the merger case DPG/RTL, even before the new assessment on media pluralism and editorial independence has been introduced.

The ACM has attached strict and structural conditions to the acquisition of RTL Nederland by DPG Media. These conditions will remain in place indefinitely, even if DPG (or parts thereof) are acquired by another competitor in the future.

Independent foundations

RTL Nieuws and NU.nl will each have, as a co-shareholder, a foundation with priority shares. These foundations will watch over the missions and identities of RTL Nieuws and NU.nl. These priority shares offer the foundations veto powers over:

- Hiring and firing the editor-in-chief
- Implementing changes to the mission and identity

- Selling and ending the broadcast/publication of RTL Nieuws and NU.nl

Directors of these foundations are independent. These two foundations are also charged with enforcing several conditions that have been attached to this acquisition. Both foundations will receive sufficient funding from DPG for their duties.

Democracy & Media Foundation (SDM)

In addition, the rights of the Democracy & Media Foundation (in Dutch: Stichting Democratie en Media, or SDM) will be expanded. SDM is a shareholder of DPG, and is committed to well-functioning, pluriform journalistic media. As a result, DPG cannot sell or end national news brands without SDM approval.

Accessibility of free online news

The news sites of RTL and NU.nl continue to be freely accessible. No paywalls can be created as a result of which free online news would disappear. RTL Nieuws and NU.nl will continue to operate as separate news brands. Both news sites will continue to be created by separate, independent newsrooms, which will not exchange any content (including video) or data. In its app and on its website, RTL will not use content from other DPG-owned national news brands on a structural basis. In that way, RTL's identity will remain intact.

Editorial independence

DPG will tighten the editorial statutes of all of its news brands in order to strengthen editorial independence.

- The procedure regarding the editorial budget, among other things, will be explained in greater detail in the editorial statutes. For example, the editorial staff can turn to a specially created committee if the editorial staff and management disagree about the budget. This committee subsequently hands down a binding recommendation.
- In addition, the editorial statutes will stipulate that the editorial staff (or editorial board) decides independently on what is published, what the composition of the editorial board is, with whom journalistic collaborations are struck, and to what extent the news content is personalized on the website or in the app. In that context, newsrooms do not exchange any data.

Charter

DPG will draw up a DPG Media Charter, with which all directors, supervisors, and current, future, direct and indirect shareholders of the DPG group commit themselves to important journalistic principles. The goal of this charter is to mandate current and future shareholders (including foreign shareholders) of DPG to respect at all times the governance structure and, more specifically, the editorial independence, and to safeguard a pluriform and diverse media landscape. This charter cannot be amended without the approval of the foundations within the DPG group.

RTL Nederland to fall under Dutch oversight

DPG will have RTL Nederland fall under Dutch oversight by the Dutch Media Authority (CvdM), thus no longer falling under Luxembourgish oversight.

13. In its response to the Dutch country chapter on the Rule of Law report, the Government has reported on several ongoing and upcoming activities in view of the Open government act (Wet open overheid, WOO), such as the launch of an interministerial working group to ensure a more efficient, responsive and verifiable WOO process. What progress has been made since then in improving the implementation of the Open government act, particularly with regard to reducing

delays in processing requests and expanding active disclosure of government information? What are the next steps, if any?

BZK: In the recent period, the government has invested in improving information management and the implementation of the Open Government Act (*Wet open overheid; Woo*). The 2025 figures show that these efforts have translated into positive developments. Although the number of requests has increased again (by 7 percent compared to 2024), the share of requests handled within the statutory or agreed time limits has risen by 10 percent.¹ While not all requests are yet completed on time, this signals a clear step forward.

In order to continue on this trend, several instruments have also been developed to improve the implementation of the Woo. These include guidance for dealing with (alleged) misuse or improper use of the Act, as well as a role description and implementation plan for the Woo contact person, that every public authority has to appoint. Work is also underway on a standardized and optimized process for handling Woo requests, which is expected to be put out for consultation this summer. These instruments support public authorities in achieving a more uniform and efficient implementation.²

In addition, an external party has conducted research into the administrative burden, costs and required capacity for handling Woo requests. These data had not previously been quantified. The results will be published shortly and will be taken into account in the statutory evaluation of the Woo that will take place in 2026. The evaluation is intended to provide direction on any additional measures needed to improve the implementation and feasibility of the Act.

The government also aims to use innovation and collaboration with civil society actors to improve implementation. In 2025, hackathons were organized in which participants developed potential tools that could help reduce the delays in processing Woo requests.³ The National Open Government Action Plan (OGP), done in co-creation with civil society, was also refreshed with new commitments to improve an open government and the Woo. The Multi-year Plan for Public Access and Information Management of the government was updated in 2025.⁴ The plan is a strategic document that guides the efforts taken, and reiterates the fundament that sound information management is an important precondition for the efficient implementation of the Woo. This work was carried out in cooperation with other levels of government.

In addition to disclosure upon request, proactive disclosure is an important component of the Woo. On 1 November 2024, the first tranche of mandatory proactive disclosure entered into force, requiring public authorities to proactively publish information from five categories. At the same time, preparations are underway for the remaining categories listed in Article 3.3 of the Woo. To support the further rollout, the *Generic Woo Facility* (GWV) is being further developed so that proactively published information can be centrally located and searched on a digital infrastructure.

Finally, the Woo also contains a ‘best-efforts obligation’ for public authorities to pursue proactive disclosure. To support this, a policy framework will soon be published to help authorities implement meaningful proactive disclosure. In addition, on the initiative of the Netherlands, an international coalition was launched in 2025 to work on an international standard for proactive disclosure within the OECD.⁵ This standard aims to support countries in strengthening policy and implementation in this area.

¹ The publication of these figures will follow shortly in the upcoming 2025 Annual Report on the Management and Operations of the Central Government.

² The publication of the aforementioned instruments will follow shortly in an upcoming letter to Parliament and therefore the links are not yet available.

³ *Kamerstukken II* 2025/26, 32 802, nr. 397.

⁴ *Kamerstukken II* 2025/26, 32 802, nr. 393.

⁵ <https://www.opengovpartnership.org/about/partnerships-and-coalitions/proactive-disclosure-coalition/>.

14. Could you elaborate on the procedural improvements introduced by the Press Council to tackle its limitations? Do you regard the changes to be sufficient to address the concerns raised in previous Rule of Law reports, such as the inability to impose rectifications or sanctions or the fact that some media outlets no longer recognise its authority?

OCW: The Dutch Press Council has introduced several procedural changes to make its complaints process less legalistic and to prevent parallel proceedings.

Complainants must now choose either the Press Council or the courts. If a complaint is submitted to the Council, the complainant must agree not to initiate legal proceedings about the same publication. Likewise, the Council will not handle cases that are already before a court. This is meant to prevent the Council from being used as a preliminary step before litigation.

Other procedural improvements are:

- Introduction of an internal appeal procedure within the Council.
- Measures to reduce legalization of the process, such as limiting the length of submissions and encouraging parties themselves (rather than lawyers) to speak at hearings.
- Reinforcing the rule that complainants should first raise their complaint with the media outlet itself before going to the Council.

We still are of the opinion that the Council is an important and successful instrument of self regulation for this sector.

15. For the third consecutive year, the organisation PersVeilig reports that the number of incidents of threats or violence against journalists has risen. What developments – if any – can be observed regarding the scale of such incidents and the response by public authorities in practice?

OCW: PersVeilig reports that the number of incidents reported increased again in 2025 (262 vs 249 in 2024). These mainly concern threats, intimidation and physical violence against journalists, often occurring while they are working in public spaces. At the same time, PersVeilig emphasizes that part of the increase may be due to journalists reporting incidents more frequently.

16. In a recent letter addressed to the cabinet of the relevant ministers, NDP Nieuwsmedia, de Nederlandse Vereniging van Journalisten, het Genootschap van Hoofddredacteuren and Free Press Unlimited requested that politicians be challenged on remarks that call into question the independence and integrity of the media and interfere with editorial independence and media freedom. What are your views and do you plan any follow up?

OCW: Journalists must always be able to carry out their work without obstruction. Statements by politicians that cast doubt on the integrity of journalists are harmful, and it is also up to politicians themselves to hold each other accountable for this. The Ministry of Education, Culture and Science will always defend journalistic freedom and is very cautious about responding to the work of journalists other than in general terms. This is always emphasized in responses to questions from members of parliament, and the Minister of Education, Culture and Science will continue to do so.

17. Last year it was flagged that PersVeilig would receive structural funding from the Ministry of Education, Culture and Science and would be transformed into an independent foundation with its own board. Could you provide an update on the implementation of this new structure? Have any concrete improvements or changes in the functioning of PersVeilig already become visible?

OCW: PersVeilig was already functioning successfully, as was also shown in the 2025 evaluation. By structurally financing the established Foundation, a sustainable organization with sustainable

funding has been secured. The aim was therefore not to improve the functioning of PersVeilig, but to ensure the continuation and stability of it's work.

18. Could you provide any additional media-related insights, including relevant legislative or regulatory initiatives, policy developments, or cases at the federal or regional level?

OCW: N.a.