

Annual Activity Report on the application of the Digital Services Act (DSA) in Belgium – 2025 –

(in accordance with article 55 of the DSA)

The Belgian Digital Services Coordinator and one of the four Belgian competent authorities:



in cooperation with the other Belgian competent authorities:



Summary

The year 2025 marked the first full year of implementation of the Digital Services Act (DSA) in Belgium within a formally established institutional framework. Significant progress was made in consolidating the role of the Belgian Digital Services Coordinator (DSC), strengthening cooperation at national and European level, and further developing the tools necessary for effective enforcement.

A key milestone was the formal institutional anchoring of the DSA framework in Belgium. Early January, the designation of the BIPT as DSC was ratified, alongside the adoption of the Act embedding the Cooperation Agreement between BIPT and the other Belgian competent authorities (CSA, Medienrat and VRM). Within this shared competence structure, coordination between the federal and community-level authorities was further strengthened and formalised throughout the year. At European level, cooperation also intensified significantly, with the Belgian DSC and competent authorities actively contributing to the work of the European Board for Digital Services and its working groups, thereby supporting the alignment of practices and the exchange of expertise across the Union.

Operationally, 2025 saw a marked increase in activity and visibility. The number of admissible complaints increased sixfold compared to 2024, indicating growing awareness among citizens and improved accessibility of the DSA framework. This trend was accompanied by increased parliamentary and media attention, reflecting the broader societal relevance of the regulation. At the same time, the relatively high number of inadmissible complaints highlights that the scope and functioning of the DSA are not yet fully understood by all stakeholders, and that expectations often extend beyond the regulation's procedural nature.

Further progress was made in strengthening the enforcement ecosystem. Three Belgian entities were designated as trusted flaggers, contributing to a more efficient identification and handling of illegal content by online platforms. While key building blocks are now in place, continued efforts are required to further develop enforcement capacities, expertise and operational procedures across the authorities involved. Enhancing transparency and accessibility for citizens, service providers and other stakeholders therefore remains an important priority.

Supervision and enforcement activities continued to develop at both national and European level. The BIPT carried out supervisory activities in relation to intermediary service providers, with particular attention to platforms of high public interest. At the same time, the European Commission pursued enforcement actions in relation to very large online platforms and search engines. These developments underline the importance of close cooperation within the European framework, particularly in cross-border contexts.

Overall, 2025 laid important foundations for the effective implementation of the DSA in Belgium. The institutional consolidation of the DSC, the first designations of trusted flaggers, and the intensification of cooperation at national and European level point to the progressive development of a coherent and effective enforcement framework. At the same time, further efforts will be needed to consolidate capacities, refine operational tools, and improve understanding of the DSA among stakeholders. The experience gained during this first full year nevertheless provides a solid basis for continued progress in the years ahead, further contributing to a safer, more reliable and more transparent digital environment.

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Aggregated annual activity report on the DSA for Belgium in 2025

"Together for a safer, more transparent and better regulated digital space."

Aggregated by the Belgian Digital Services Coordinator



on the basis of contributions from the four Belgian competent authorities



1. Introduction

1.1. General introduction to the DSA

The Digital Services Act ("DSA") provides harmonised rules for a safe, predictable and trusted online environment when interacting with so called 'intermediary services', which include e.g. online platforms, hosting services or search engines. Examples of such harmonised rules are (1) additional transparency requirements on how online platforms moderate content, (2) citizens' access to out-of-court dispute settlements and (3) rules for the status of trusted flaggers and transparency obligations for trusted flaggers. The DSA also aims at preventing illegal content online, protecting minors online as well as preventing the spread of disinformation. Providers of Very Large Online Platforms ("VLOPs") and Very Large Online Search Engines ("VLOSEs") face additional scrutiny, such as the obligation to provide transparency on advertisements or the publication of their assessment on systemic risks.

The DSA is enforced by the national **Digital Services Coordinators** (hereinafter "**DSCs**"), other national regulators designated as competent authorities in their Member States and for VLOPs and VLOSEs (hereinafter "VLOPSE's") by the European Commission. The BIPT is the Digital Service Coordinator for Belgium.

Given the division of competences in Belgium, on May, 3rd 2024 a cooperation agreement¹ was concluded between the Federal State and the Communities in order to organise the coordinated implementation of the DSA (hereinafter 'the cooperation agreement').

The four designated **competent authorities** (hereinafter "CAs") are:

- the Belgian Institute for Postal Services and Telecommunications BIPT (federal level) (hereinafter « **BIPT** »),
- the Conseil Supérieur de l'Audiovisuel (French Community) (hereinafter : « **CSA** »),
- the **Medienrat** (German-speaking Community),
- the Vlaamse Regulator voor de Media (Flemish Community) (hereinafter : « **VRM** »).

Pursuant to Article 49 DSA, this means that the BIPT, the CSA, Medienrat and VRM, are each responsible for monitoring and enforcing the DSA, within the limits of their respective competences as defined by the Belgian institutional framework. At the same time, in its role as DSC, the BIPT coordinates these matters at national level and engages in cooperation and information exchange with other DSCs, contributing to the effective and consistent supervision and enforcement of the DSA across the entire Union.

As the BIPT performs the duties of both the DSC and CA, this report refers to it as "BIPT (DSC)" when it acts as the DSC and "BIPT (CA)" when it acts as the CA.

Pursuant to Article 5 of the Cooperation Agreement, the exchange of information between the Belgian DSC and the designated CAs, relating in particular to complaints, applications for the certification of trusted flaggers, orders and the annual activity reports of these authorities, takes place via a national information-sharing system called Domus (hereinafter "Domus"). As regards exchanges with the European Commission and the DSCs of other Member States, these take place, in accordance with Article 85 of the DSA, via a European information-sharing system known as AGORA (hereinafter "AGORA").²

¹ Cooperation Agreement of 3 May 2024 between the Federal State, the Flemish Community, the French Community and the German-speaking Community on the coordinated partial implementation of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act)

² [DSA - AGORA: data-sharing platform between Digital Services Coordinators and the Commission ready for operation | Shaping Europe's digital future](#)

1.2. Context

Article 55 DSA requires every DSC to prepare and publish an annual report detailing its activities during the past year. The report must include information on complaints received under Article 53 DSA and more specific information such as the number and types of orders to act against illegal content or orders to provide information that were issued by national judicial or administrative authorities in the relevant Member State, according to Articles 9 and 10 DSA. The report should also include information on the actions taken in response to these orders, as communicated back to the DSCs.

The DSC will also share this report with the European Commission and the European Board for Digital Services.

For Member States that have designated several competent authorities to be responsible for the supervision and enforcement of the DSA, the DSC is required to consolidate the activities of all competent authorities into one comprehensive annual activity report.

This annual report describes the tasks carried out in 2025 up to and including 31 December 2025, by the BIPT, in its capacity as DSC and CA, as well as by the other competent authorities (CSA, Medienrat and VRM). The BIPT, in its capacity as DSC, has integrated the contributions of all Belgian competent authorities into one coherent report, ensuring full compliance with the obligations of Article 55(3) DSA. The report covers, inter alia, the evolution of complaints, measures taken, certifications, enforcement activities and national and international initiatives.

An annex to the report contains the individual contributions of the four competent authorities. Each authority is responsible for the preparation of its own contribution and for ensuring the accuracy of the information it contains. By validating its contribution, the authority confirms its agreement with the use of relevant elements drawn from it for inclusion in the consolidated annual activity report.

2. Complaints (Article 53, DSA)

2.1. Introduction

Article 53 DSA establishes the right of recipients of intermediary services, or any mandated organisation or association acting on their behalf, to lodge a complaint against providers of these intermediary services alleging an infringement of the DSA. Complaints should be directed to the DSC in the Member State where the recipient of the service is located or established.

The DSC will assess the complaint and, where appropriate, forward it to the DSC in the Member State where the provider of the intermediary services is established, possibly accompanied by an opinion. If the complaint falls under the responsibility of another competent authority within the same Member State, the DSC will transfer the complaint to the appropriate relevant authority.

In Belgium, the BIPT, acting as the DSC, is in principle responsible for receiving complaints³. Upon receipt, it carries out a preliminary assessment of the complaint,⁴ including determining whether it should be transmitted to the DSC of another Member State or handled by a competent authority in Belgium.

Where a complaint is transmitted to the DSC of the Member State of establishment, the BIPT continues to act as an intermediary between the complainant and the competent DSC. The BIPT serves as a point of contact for the complainant and ensures the coordination of communications between the parties involved. The BIPT also keeps the complainant informed of the progress and outcome of the handling of the complaint. This approach ensures that the complainant benefits from a clear and streamlined communication channel, while facilitating consistent information-sharing and effective cooperation between the authorities concerned.

Where a complaint is to be handled by a Belgian authority, the BIPT identifies which authority appears to be competent, namely the BIPT acting as CA, the CSA, the Medienrat or the VRM.

Following this assessment, the BIPT (DSC) transmits the anonymised complaint via a shared communication platform (Domus) to all CAs and informs them of the proposed allocation of competence. In accordance with Article 11 of the Cooperation Agreement, the CAs may challenge this allocation and indicate which authority they consider competent.

Once the allocation of competence has been agreed upon, the BIPT (DSC) forwards the non-anonymised complaint to the CA responsible for handling it. For example, where the BIPT acting as CA is designated as competent, it will subsequently process the complaint.

The process from the receipt of complaints to the transmission of the non-anonymised complaint by the BIPT is summarised in the figure below.

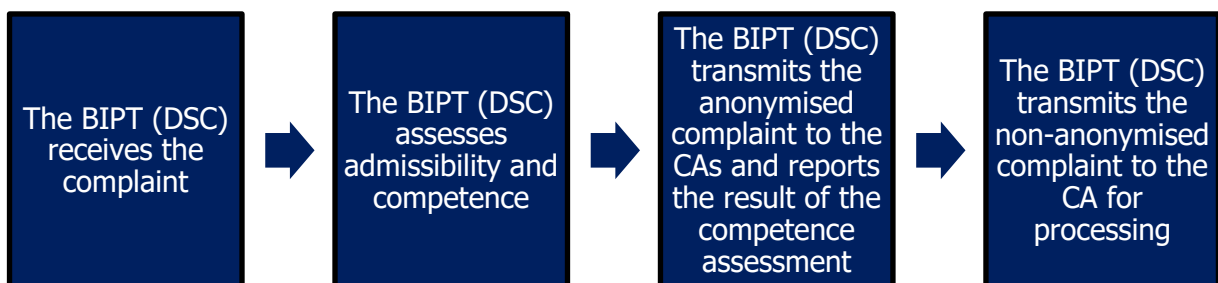


Figure 1: Process for receiving and transmitting complaints between DSC and CA (Source: BIPT)

³ Where a notification is submitted directly to a CA rather than to the BIPT (DSC), the CA forwards it to the BIPT (DSC) for processing.

⁴ Every notification received is subject to a preliminary assessment. This assessment includes verifying whether the notification falls within the material and territorial scope of the DSA, identifying the relevant provider of intermediary services and, where necessary, liaising with the complainant to supplement or clarify certain aspects of the case. In several instances, requests for further information remained unanswered, preventing the notification from being processed further. Furthermore, from the end of February 2025 onwards, the BIPT (DSC) decided to systematically keep count of notifications that could not be processed further following this preliminary assessment, in order to better reflect and quantify the actual workload borne by the teams responsible for analysing them.

2.2. Complaints in 2025

Compared with 2024 (see graph below), the number of complaints rose from 10 to 65 in 2025.

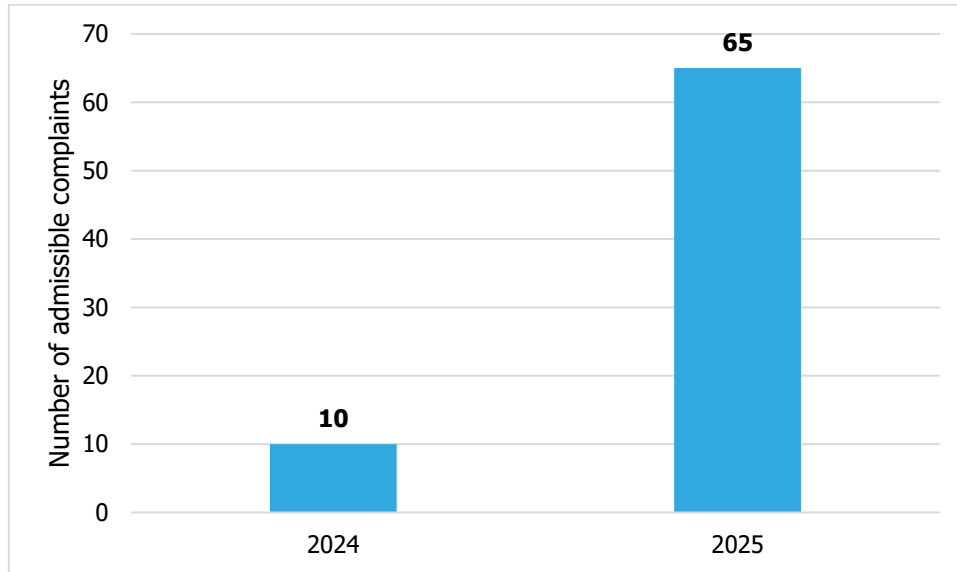


Figure 1. Evolution of the number of admissible complaints received (source: BIPT)

This trend can be attributed in particular to the growing visibility of the DSA, which is prompting a larger number of reactions.

Furthermore, since the end of February 2025, the BIPT (DSC) has registered 206 notifications. For the purpose of this report, “notifications” refers to submissions that provide information, raise concerns or report online content but in respect of which insufficient information was provided to allow them to be processed as formal complaints under the DSA framework (more details in section 2.2.1.1). This volume suggests that there remains a degree of uncertainty among users regarding the information required for a complaint to be processed under Article 53 DSA.

It should be noted that, at the time of writing, some cases are still being analysed and processed. Some of the cases may subsequently be reclassified, where appropriate, as either notifications or complaints. Updated figures for 2025 will be published in the 2026 annual report.

The complaints concerned both providers of intermediary services established in Belgium or represented by a legal representative in Belgium, and providers established in other Member States. Pursuant to Article 53 of the DSA, the BIPT transmitted the cross-border complaints via AGORA, in cooperation with the DSCs concerned. The BIPT continued to act as an intermediary between the complainant and the competent DSC. The BIPT also kept the complainant informed of the progress and outcome of the handling of the complaint. Furthermore, in accordance with Article 5 of the Cooperation Agreement, the BIPT (DSC) continued to share relevant information with the competent Belgian authorities via Domus established for that purpose.

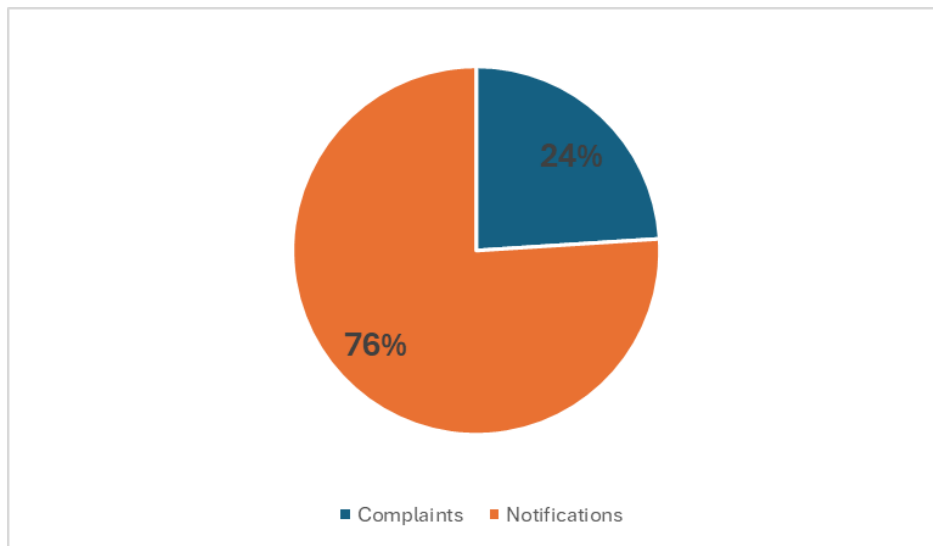
With regard to the complaint submission procedure, a clarification has been added to the [form](#) to inform complainants that it is not necessary to submit images of potentially illegal content. This form also enables complainants to describe their situation in detail, to select the scenarios corresponding to the alleged infringement of the DSA, and to provide the necessary authorisations for the sharing of information with the relevant provider and with the DSC of the competent Member State.

2.2.1. Complaint categorisation

2.2.1.1. Number of complaints handled by the DSC itself and/or other competent authorities in the Member State

Authority	Number of complaints analysed
BIPT – DSC	65
BIPT – CA	3
CSA – CA	0
Medienrat - CA	0
VRM - CA	0
Notifications	206
Total cases received	271

As shown above, of the 271 cases received in 2025, 206 (76%) were categorised as notifications⁵, and 65 (24%) as complaints by the BIPT (DSC).



Figuur 2: Proportion of cases received that were categorised as notification or complaint (source: BIPT)

Of the 271 cases examined by the BIPT, in its capacity as the DSC, 65 were processed as formal complaints. These are cases that contained sufficient information to be assessed under Article 53 of the DSA and which, following an initial examination, indicated a potential infringement of the DSA.

These complaints were then reviewed by the BIPT (DSC) to determine whether they fell within the competence of a DSC in another Member State (see section 2.2.1.2). Where no cross-border dimension was identified, the competent national authority (BIPT⁶, CSA, VRM or Medienrat) was designated accordingly. Three complaints were ultimately handled by the BIPT Acting in its capacity as CA.

As regards the 206 notifications, this category covers submissions that could not be processed as formal

⁵ BIPT received 3 files from the CSA. These were all categorised as notifications, due to the lack of the necessary information or the absence of a response to our request for clarification or additional information by the complainants.

⁶ For more information on the complaints handled by the BIPT (CA), see Annex 1.

complaints under Article 53 of the DSA because the information provided did not allow the BIPT (DSC) to carry out the initial assessment described above, including the verification of scope, the identification of the relevant intermediary service provider, or, where necessary, follow-up with the complainant.

This also includes cases where submissions were made directly to the BIPT by complainants residing in another Member State. In line with agreed good practices among DSCs, the BIPT informs the complainant in such cases and, where appropriate, redirects them to the DSC of their Member State of residence.

Notifications also include submissions that are insufficiently substantiated and do not contain the information necessary to enable the BIPT (DSC) to enable the initial assessment whether there has been a potential violation of the DSA. In such situations, complainants are invited to provide further information, such as evidence of steps already taken or correspondence with the service provider. Where such information is provided, the case may be reassessed and, where appropriate, recategorized as a formal complaint. However, requests for further information often remain unanswered. Until the necessary information is received, these cases remain categorised as notifications.

Finally, incomplete files received from other Digital Services Coordinators may also affect processing and, where relevant, lead to classification as notifications where the information provided does not allow the initial assessment under Article 53 of the DSA to be completed.

2.2.1.2. Categorisation of the total number of complaints sent per specific receiving DSC

Authority in other Member State	Number of complaints forwarded to this DSC
CNAM – Ireland	50
ACM – the Netherlands	11
RRT – Lithuania	1
Total	62

In 2025, of the 65 formal complaints, the BIPT (DSC) received and transmitted 62 complaints **to other European DSCs** via AGORA. Of these, 50 complaints were transmitted to Coimisiún na Meán (Ireland), 11 to the Autoriteit Consument & Markt (the Netherlands) and 1 to the Lithuanian DSC, the Communications Regulatory Authority.

2.2.2. Complaints that led to a formal investigation in 2025

For the 3 complaints it handled as CA, the BIPT sent requests for information to the relevant provider of intermediary services (see, in particular, Annex 1 to this report).

3. Orders (Articles 9 and 10, DSA)

3.1. Introduction

Article 9 of the DSA outlines the obligations of providers of intermediary services when they receive an order from national judicial or administrative authorities to act against illegal content.

First, when a provider receives such an order, it must inform as soon as possible the issuing authority (or another specified authority) about any effect given to the order, specifying if and when effect was given to the order. The article also sets conditions for the orders issued by the relevant national

judicial or administrative authorities.

The issuing authority must share the order and any information about the effect given to it with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

Article 10 of the DSA provides that providers of intermediary services are required to promptly inform the relevant national judicial or administrative authority upon receiving an order to provide specific information about individual recipients of their services. Similarly to Article 9 of the DSA, Article 10 also sets requirements for the orders issued by the national judicial and administrative authorities. The issuing authority must also share the order and any information about the effect given to it with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

The DSC receives and centralises all orders issued by all competent administrative and judicial authorities, including sectoral authorities issuing orders pursuant to Articles 9 and 10 of the DSA.

3.2. Orders received

In 2025, the BIPT (DSC) received **67 orders**.

Of these orders:

- **59** were issued under Article 9 of the DSA (none under Article 10) and were transmitted by **national** administrative or judicial **authorities** via Domus. They exclusively concerned providers of intermediary services who had neither a place of establishment nor a legal representative in Belgium;
- **8** were transmitted by **DSCs from other Member States** via AGORA, of which 4 were issued under Article 9 of the DSA and 4 under Article 10. They all concerned the same provider of intermediary services, whose legal representative is established in Belgium, and for which the BIPT acts as the DSC.

The number of orders referred to the BIPT (DSC) under Articles 9 and 10 of the DSA is likely to increase as practices within the authorities (both administrative and judicial) become more established. In 2025, the BIPT (DSC) continued its dialogue with national administrative and judicial authorities with the power to issue orders, notably through meetings, presentations and conferences. These discussions help participants to gain a better understanding of the framework and to identify appropriate methods of transmission.

In this context, the BIPT (DSC) has also begun work aimed at promoting a more harmonised approach and developing common tools, particularly regarding standardisation and sharing.

Within the framework of the European DSA Board working groups (for more details regarding working groups, see section 7.3.2), the BIPT (DSC) also actively participated in discussions on the modalities for receiving orders. On that occasion, the BIPT raised crucial questions regarding the practical management of a potentially large volume of orders. In particular, the BIPT highlighted the current technical challenges related to the efficient receiving and processing of such a volume of orders.

Furthermore, the BIPT regularly consulted its European counterparts, both within these working groups and at other meetings, inviting them to share relevant orders.

3.3. Action taken in response to the orders

In 2025, eight orders concerned providers of intermediary services with a legal representative in Belgium. For some of these orders, the provider of intermediary services concerned had already taken action, so that no intervention by the BIPT (DSC) was required. In three out of eight cases, however, the BIPT (DSC) sent further questions to the provider of intermediary services concerned.

4. Out-of-court dispute settlement bodies (Article 21, DSA)

4.1. Introduction

Under the DSA, out-of-court dispute settlement bodies offer an additional opportunity for recipients of services to have content moderation disputes with providers of online platforms resolved.

The latter must inform recipients of services of this option for settling disputes and are also required to cooperate with certified dispute settlement bodies.

DSCs grant the status of dispute settlement body, upon request, to entities established in their Member States, provided that they meet the conditions set out in Article 21 of the DSA. For example, the dispute settlement bodies must be independent. They must also possess the necessary expertise regarding a specific type of illegal content or regarding the application of the terms and conditions of one or more types of online platforms. Dispute settlement bodies must handle disputes in at least one official EU language.

In Belgium, entities wishing to be granted the status of out-of-court dispute settlement body may submit an application to that effect to the BIPT (DSC). The BIPT (DSC) designates the competent authority or authorities which will process the application.

4.2. Certification of out-of-court dispute settlement bodies in 2025

The BIPT (DSC) has been approached a few times with exploratory questions about the certification process and conditions as an out-of-court dispute settlement body in Belgium. The BIPT (DSC) published ad hoc information on its website⁷. Interested persons were invited to have or continue discussions on this basis. This did not result in formal applications for acknowledgment as an out-of-court dispute settlement body in 2025.

The BIPT (DSC) also published a number of answers to frequently asked questions for the target audience 'consumers' on its website⁸.

⁷ <https://www.bipt.be/operators/digital/digital-services-act/out-of-court-dispute-settlement-bodies>

⁸ <https://www.bipt.be/consumers/digital/the-digital-services-act-dsa/out-of-court-dispute-settlement-for-online-platforms>

5. Trusted flaggers (Article 22, DSA)

5.1. Introduction

Under the DSA, trusted flaggers are experts at detecting and identifying specific categories of illegal content online - such as illegal hate speech, CSAM or terrorist content - and reporting such content to the relevant online platforms. Notices submitted by trusted flaggers must be processed with priority by online platforms, as they are expected to be more precise and reliable than notices submitted by the average user.

The DSC of the Member State where the applicant entity is established, is responsible for awarding the trusted flagger status. The DSC oversees the application process, ensuring the entities meet the criteria set out in Article 22 DSA, including particular expertise and competence for the purposes of detecting, identifying and notifying illegal content; independence from any online platform; and the diligent, accurate and objective submission of notices.

Pursuant to Article 22 (8) of the DSA, the Commission, after consulting the Board, shall, where necessary, issue guidelines to assist providers of online platforms and the DSCs in the application of these criteria. The preparatory work for the drafting and adoption of these guidelines commenced in 2025 and remains ongoing.

5.2. Certification of trusted flaggers in 2025

In accordance with Article 10, §1 of the Cooperation Agreement, the BIPT (DSC) receives all requests for the trusted flagger status and uploads them to Domus. The BIPT (DSC) indicates the competent authority which in its view, should handle the request.

The CAs have the opportunity to challenge the proposal within five working days and indicate which authority in their view should handle the request. Where no disagreement is raised within this period, the competent authority is determined accordingly. It is possible that several authorities are considered competent for handling one request.

All relevant information on the assignment of the status of trusted flaggers is available on the BIPT website⁹, which also explains how a request can be submitted to the DSC. In addition, a document has been made available containing the supporting documents which may support a candidacy for each criterion.

Potential candidates may contact the DSC at any time to clarify the applicable criteria, the procedure of submission or the nature of the supporting documents to be submitted. As from the submission of the request, the applicant shall be informed of the progress of the procedure, including the designation of the competent authority for the file and the means of contacting that authority.

Where more than one competent authority is designated for the examination of an application, the BIPT shall act as a central contact point for the consolidation and coordination of any additional information requests made by all authorities concerned. The BIPT shall also organize explanatory meetings with the candidate, where appropriate, in the presence of all competent authorities. This will ensure that the candidate has a single point of contact and only needs to provide and explain the information requested once, where necessary. It also ensures that all competent authorities have the same information to

⁹ <https://www.bipt.be/operators/digital/digital-services-act/trusted-flaggers>

For the complete list of entities that have already been awarded the trusted flaggers status within the EU: <https://digital-strategy.ec.europa.eu/en/policies/trusted-flaggers-under-dsa>.

support their assessment and decision-making.

The examination of the first application for acknowledgment as a trusted flagger required structural coordination between the competent Belgian authorities, with a view to developing information exchange procedures in accordance with the Cooperation Agreement.

In 2025 the BIPT (DSC) received four requests for the trusted flagger status. Following a preliminary assessment of the cases, the requests were forwarded to the competent authorities. Three entities were awarded the status of trusted flagger. The examination of the fourth request had to be continued in 2026.

In October 2025, the VRM granted the status of trusted flagger, within the meaning of Article 22 of the DSA, to the Flanders Human Rights Institute ('FLANHRI').¹⁰ The Flanders Human Rights Institute obtained the status of trusted flagger for online illegal content related to human rights under the Flemish competences and the equal treatment of persons (incl. persons with disabilities).

By November 2025, the BIPT¹¹ (in its capacity of CA) and two other competent authorities which were also designated for the examination of this request, namely the CSA¹² and the Medienrat¹³, awarded the status of trusted flagger to the second entity, the Interfederal Centre for Equal Opportunities and Opposition to Racism (hereinafter 'Unia'). This status was granted on the basis of Unia's recognised expertise in terms of online illegal speech. The granting of official trusted flagger status to Unia reinforces the framework for combating hate speech and discrimination online.

Finally, in December 2025¹⁴ the status of trusted flagger was awarded to the third entity, Child Focus. For this application, the BIPT acted as the sole designated competent authority. The award was based on the specific expertise of Child Focus regarding online sexual exploitation of minors.

The table below summarises the information above and lists the trusted flaggers certified in 2025 in Belgium:

Certified trusted flagger	Subject	CA which processed the application
Unia	Online illegal speech (specifically : discrimination, illegal hate speech and Holocaust denial)	CSA, BIPT (CA) and Medienrat
Child Focus	Online sexual exploitation of minors	BIPT (CA)
Flanders Human Rights Institute	Illegal online content relating to human rights and equal treatment (including of people with disabilities)	VRM

Table 1: trusted flaggers certified by the Belgian competent authorities in 2025 (source: BIPT)

In addition, the BIPT (DSC) regularly handles enquiries from potential candidates for the status of

¹⁰ See VRM Decision No 2025/048 of 13 October 2025.

¹¹ BIPT Council Decision of 12 November 2025 on Unia's application for the status of trusted flagger: <https://www.bipt.be/consumers/publication/decision-of-12-november-2025-on-unia-s-application-for-the-status-of-trusted-flagger>

¹² Unia: granting of Trusted Flagger status: <https://www.csa.be/document/unia-attribution-du-statut-de-signaleur-de-confiance/>

¹³ UNIA recognized as a trusted Flagger: <https://www.medienrat.be/unia-als-vertauenswuerdiger-hinweisgeber-anerkannt/>

¹⁴ BIPT Council Decision of 22 December 2025 on Child Focus' application for the status of trusted flagger: <https://www.bipt.be/consumers/publication/decision-of-22-december-2025-on-child-focus-application-for-the-status-of-trusted-flagger>

trusted flagger. It provides clear explanations on the applicable criteria, the procedural requirements and the supporting documents to be submitted. In this context, the BIPT (DSC) also organises online meetings so that interested entities can explain their questions directly and receive guidance in person. This service is provided in a transparent, uniform and unbiased manner, with a view to ensuring the correct, efficient and legally certain treatment of future applications.

6. Vetted researchers (Article 40, DSA)

6.1. Introduction

Under Article 40 of the DSA, researchers may apply for recognition in order to access non-public data from VLOPSEs for a specific research project, to conduct studies on systemic risks and risk mitigation measures. The DSC of the Member State where the VLOPSE is established grants the status of 'vetted researcher' to researchers who submit a reasoned application and can demonstrate that they meet the conditions laid down in Article 40 of the DSA. This DSC of establishment then submits a reasoned request for access to data with the VLOPSE, which is required to provide access.

6.2. Status granted to vetted researchers in 2025

In 2025, steps were taken at a European level to operationalise the process of access to platform data. On 27 June 2025, the DSA Board adopted a 'Cooperation Framework', an internal working document that defines the way in which DSCs cooperate with regard to Article 40 of the DSA.

In addition, the European Commission adopted Delegated Regulation (EU) 2025/2050 of 1 July 2025 supplementing Regulation (EU) 2022/2065 of the European Parliament and of the Council by laying down the technical conditions and procedures under which providers of very large online platforms and of very large online search engines are to share data with vetted researchers (hereinafter 'the Delegated Regulation')¹⁵, referred to in Article 40, §13 of the DSA.

Since the entry into force of this Delegated Regulation on 29 October 2025, researchers can officially apply for access to platform data via the European Commission's 'DSA Data Access Portal'¹⁶.

As there are no VLOPSEs based in Belgium in 2025, the BIPT as DSC can only receive applications from researchers who are affiliated with a Belgian research organisation¹⁷. Thus, only an initial assessment (a non-binding opinion) of the application¹⁸ can be carried out in Belgium, after which the application must be forwarded to the DSC of establishment of the VLOPSE to which the researcher's application for access to platform data relates. The VLOPSE's DSC of establishment decides on the application.

In 2025 the BIPT (DSC) did not receive any applications from researchers to be acknowledged under Article 40 of the DSA. However, it held informal discussions with a Belgian researcher interested in submitting such an application.

¹⁵ Commission Delegated Regulation (EU) 2025/2050 of 1 July 2025 supplementing Regulation (EU) 2022/2065 of the European Parliament and of the Council by laying down the technical conditions and procedures under which providers of very large online platforms and of very large online search engines are to share data with vetted researchers, *OJ L*, 2025/2050, 9 October 2025.

¹⁶ <https://data-access.dsa.ec.europa.eu/>.

¹⁷ In the sense of Article 40(8)a of the DSA

¹⁸ In the sense of Article 40(9) of the DSA.

7. Enforcement and (inter)national activities

7.1. Introduction

In 2025, DSCs and other competent authorities engaged in a range of enforcement activities, complemented by various international and national initiatives, both formal and informal, aimed at fostering compliance, enhancing cooperation, and ensuring the effective implementation of the DSA.

7.2. National activities in 2025

In addition to its activities mentioned under the specific chapters, the BIPT also carried out other national DSA activities.

For the purpose of information exchange, it has organised several meetings with the Belgian representation at the European Commission and representatives of the European Commission itself. Questions were also sent regarding the calculation and publication of the number of average monthly active recipients in the European Union. In addition, the BIPT (DSC) addressed several requests for information to intermediary services providers to clarify the classification of their services under the DSA.

Furthermore, the BIPT (DSC) undertook several outreach initiatives to support the implementation and understanding of the DSA. For example, it presented the complaint handling system under the DSA during the conference 'Digital platform regulation and the importance for SMEs and start-ups in Belgium', organised by the FPS Economy. It also took part in a round-table discussion on *Online Commercial Practices by Young Consumers*, organised by Child Focus. In addition, the BIPT (DSC) participated in a round-table discussion during a conference of UCLouvain Saint-Louis Bruxelles, which took stock of the impact of the DSA on freedom of expression. The BIPT (DSC) also contributed to the *Belgian Stakeholder Roundtable on the Guidelines on the Protection of Minors*, organised by the European Commission.

With the entry into force of the cooperation agreement designating the competent authorities (BIPT, CSA, Medienrat, VRM) on January 9, 2025, the competent authorities participated in several meetings to ensure the proper implementation of the regulation at national level to fully assume their role as regulator of online platforms in the context of the DSA.

Together with the DSC, the competent authorities participated in information meetings with various stakeholders (e.g. on the protection of minors online).

On the occasion of the double anniversary of the Medienrat – 25 years Medienrat, 20 years a regulatory authority – the Medienrat of the German-speaking Community invited to the colloquium in Eupen : „Media regulators in the digital society: between content and network regulation – *Concepts, powers, legal status and resources, roles and tasks, cooperation*“ in collaboration with the Centre de Recherche Information, Droit et Société (CRIDS / NaDI) of the University of Namur.

Finally, the BIPT (DSC) also addressed 15 DSA-related parliamentary questions, questions from journalists and other enquiries.

7.3. International activities

7.3.1. European Board for Digital Services

The European Board for Digital Services (the "Board") aims to contribute to a safe, predictable, and trusted online environment that promotes innovation while safeguarding the protection of fundamental rights. Through the Board, the European Commission and the DSCs work together as a cohesive team, adopting a European approach to the enforcement of the DSA. The Board thus plays a vital role in ensuring the consistent application of the DSA across the European Union, benefiting all European citizens, society, and the economy.

The Board is the platform for discussing all relevant issues and priorities regarding the application of the DSA. Close, trustful cooperation and coordination, taking into account the specific impact of intermediary services in individual Member States, are essential for effective and coherent enforcement of the DSA throughout the European Union.

For DSCs participating in the Board, it is important to actively contribute to this process. Board members support, advise, and assist the European Commission and the other DSCs in their supervisory tasks. They provide each other with insights and expertise, consult external experts when necessary, and contribute to the analysis of emerging issues related to digital services within the internal market. Therefore, participation in the Board requires an active role in collaboration and working together to ensure DSA compliance, with attention to the specific context of each Member State.

In 2025, the European Board for Digital Services held a total of 6 meetings and 3 ad hoc meetings.¹⁹ These meetings served as a critical platform for discussing the ongoing implementation and enforcement of the Digital Services Act (DSA) across the European Union. The meetings provided an opportunity for Board members to engage in in-depth deliberations on a variety of issues and priorities related to the digital services landscape. Each meeting played a significant role in advancing the collective goals of ensuring a safe, transparent, and innovative digital environment across the EU.

The BIPT (DSC) attended all Board meetings.

7.3.2. The working groups

In addition to the Board meetings, experts of the BIPT (DSC) have participated in all the Working Groups that have been established under the Board.²⁰

Like in 2024, there was a great deal of work on the agenda in 2025 for the eight Board Working Groups that contribute to the Board's work. Each Working Group has specific areas of activity in relation to the DSA and examines relevant specific questions and prepares documents for the Board as provided for in the Board's Work Plan.

The members of the Working Groups are the members of the DSCs. For some Working Groups, experts from one of the recognised competent authorities are also involved. The European Commission chairs each Working Group through a representative at technical level.

At the request of the respective DSC, other competent authorities of a Member State to which specific operational responsibilities for the application and enforcement of the DSA have been entrusted by national law may be invited by the Chair of the Working Group to attend certain agenda items at ad hoc

¹⁹ <https://digital-strategy.ec.europa.eu/en/policies/dsa-board> - European Board for Digital Services

²⁰ <https://digital-strategy.ec.europa.eu/en/policies/dsa-board-working-groups>

meetings of the Working Group.

7.3.2.1. Working Group 1 – Horizontal and legal issues

This Working Group focusses on the scope and different definitions of the DSA. The DSCs have the possibility to raise certain issues which will then be discussed with the other DSCs and the Commission.

This Working Group held eight meetings in 2025, including on

- determining the main establishment;
- classification of certain services under the DSA;
- cross-border services;
- the concepts of service and intermediary services provider;
- relevant court cases;
- competences of the DSCs;
- the enforcement of provisions on reporting mechanisms for illegal content and transparency on the number of users;
- the absence of a legal representative from suppliers established outside the EU;
- the interaction between the DSA and other regulations and directives;
- and the evaluation report on the DSA.

7.3.2.2. Working Group 2 – Working together

Working Group 2 aims to promote cooperation between the Digital Services Coordinators, the European Commission and other stakeholders, with a view to ensuring a consistent application of the DSA.

A key area of focus in 2025 was the development of *best practices* for handling complaints (Article 53 of the DSA) in order to streamline cooperation between DSCs in practice and ensure it runs as smoothly as possible. In this regard, the BIPT (DSC) invariably attaches importance to transparent and uniform practices, as well as clear communication towards complainants.

The Working Group also provided feedback on the Board Report regarding systemic risks (Article 35(2) of the DSA), paid particular attention to the *DSA incident response framework* developed by the European Commission, and a number of national protocols already developed within this framework. Further on the agenda was the sharing of relevant information with the European Commission, as well as the operation of the DSA Board.

Working Group 2 also prepares the Board Work Plan.²¹

The Working Group also started developing a more structured approach to DSA communication in the course of 2025, including through a network of communication experts and a workshop (July 2025). Common key messages have been developed as well as lines of communication on specific themes or current issues and press releases following major milestones and/or Board meetings. The BIPT (DSC) supported the principle and importance of coherent communication, always respecting the national context and institutional division of competence.

The Working Group met 10 times in 2025 and also organised a joint meeting with Working Group 6 (Protection of minors) and a workshop for the network of communication experts.

7.3.2.3. Workgroup 3 – Content moderation and data access

This working group focuses on several topics: trusted flaggers, out-of-court dispute settlement bodies,

²¹ The second DSA Board Work Plan that runs from Q4 2025 to Q4 2026 can be found here: <https://digital-strategy.ec.europa.eu/nl/policies/dsa-board>

access to data by vetted researchers, transparency reports, and intellectual property issues.

Regarding trusted flaggers, the working group facilitated discussions between DSCs with a view to harmonising the procedures for granting this status, particularly in the context of discussions on the guidelines currently being drawn up by the Commission. In this regard, the BIPT (DSC) has established itself as an active and constructive partner, whose high-value-added contributions have been well received by other Member States.

Similarly, with regard to the out-of-court dispute settlement mechanism: the meetings of this working group gave rise to discussions on the criteria for granting the certified body status, as well as on the possibility for certified bodies to refuse to handle certain requests. A study was launched by the European Commission and presented to the working group; a one-day workshop was even organised to examine this topic in depth.

Regarding data access requests from vetted researchers, the work focused, among other things, on data protection, security and standardisation of access, the assessment of requests, and the establishment of harmonised practices. The delegated act adopted on 1 July 2025 and which entered into force on 29 October 2025²² was also discussed. Given the importance of this arrangement and the responsibilities of the DSCs, the matter was discussed in depth over the course of several meetings; the DSCs took part in pilot tests of the access request portal, and a one-day workshop was held to familiarise participants with the framework and discuss key considerations with the Commission prior to its entry into force.

Finally, the issue of intellectual property rights infringements – and more specifically online piracy and the piracy of live-streamed events – was introduced in 2025. The aim was to begin mapping the challenges faced by Member States, existing measures and their effectiveness, as well as the tools that the DSA is likely to provide to combat such offences.

In 2025, working group 3 met 15 times, including ten regular meetings, three ad hoc meetings on data access and two thematic workshops.

7.3.2.4. Working Group 4 – Integrity of the information space

This Working Group covers, inter alia, the assessment of systemic risks for national and regional elections. It also exchanges experience and knowledge on the monitoring of the actions of the VLOPSEs and the implementation of the Commission's guidelines on the reduction of systemic risks to electoral processes, which apply to VLOPSEs. The Working Group is also charged with building expertise and knowledge on the assessment and limitation of misinformation and disinformation and the protection of media freedom and media pluralism.

The Working Group held nine meetings in 2025. The topics covered were among other things

- the Council conclusions²³ on the conversion of 'Code of Practice on Disinformation' from 2022 into a Code of Conduct within the meaning of Article 45 of the DSA;
- drawing up and updating the DSA Election Toolkit for Digital Services Coordinators²⁴;
- exchanges of information on forthcoming and past elections;
- input into the annual report of the Digital Services Board on systemic risks and exchanges related to the European Democracy Shield;
- the Regulation on transparency and targeted political advertising;
- the role of the DSA in contributing to protecting media freedom and media pluralism, supporting freedom of expression and information

²² Commission Delegated Regulation (EU) 2025/2050 of 1 July 2025 supplementing Regulation (EU) 2022/2065 of the European Parliament and of the Council by laying down the technical conditions and procedures under which providers of very large online platforms and of very large online search engines are to share data with vetted researchers, OJ L, 2025/2050, 9 October 2025.

²³ <https://digital-strategy.ec.europa.eu/en/library/code-conduct-disinformation>

²⁴ <https://digital-strategy.ec.europa.eu/en/library/dsa-elections-toolkit-digital-services-coordinators>

- discussions on the role of recommender systems and AI as a risk factor for information integrity related systemic risks
- developing cooperations with other relevant (European) Union bodies or Departments, such as the Media Board, the European External Action Service.
- and responding under the DSA to hybrid threats and foreign information manipulation and interference (FIMI).

7.3.2.5. Working Group 5 – Consumers and online marketplaces

This working group focuses on the following aspects of the implementation of the DSA:

- the implementation of Articles 30 to 32 of the DSA, regarding the traceability of traders and the obligations of online marketplaces;
- the link between the DSA and consumer protection in the broad sense;
- the cooperation between different authorities (consumer protection in the broad sense, customs, market surveillance authorities, etc.).

In 2025, the working group focused in particular on clarifying the relationship between the DSA and the applicable product safety regulations. In this context, it held discussions with working group 1.

In 2025, working group 5 also started two specific workflows:

- Firstly, a workflow relating to e-commerce, which aims to identify the national authorities active in this field;
- Secondly, a workflow on financial fraud, which aims to discuss enforcement approaches across Member States, identify and make an inventory of common fraud schemes on online platforms, and strengthen detection, prevention and response mechanisms across all platforms.

As part of an initiative to combat online scams, the Commission has launched a communication campaign to raise public awareness of potential fraud linked to e-commerce activities. This campaign was launched just before Black Friday and ran through to the festive season. The BIPT (DSC) has supported this initiative by sharing the campaign material provided by the European Commission.

In 2025, this working group met five times, including three regular meetings and two ad hoc meetings. The purpose of these ad hoc meetings was, on the one hand, to prepare the two workflows currently under development and, on the other hand, to provide further clarification regarding the communication campaign being run at European level.

7.3.2.6. Working Group 6 – Protection of minors

This Working Group focuses on the protection of minors in accordance with Article 28 of the DSA. In 2025, work focused in particular on the elaboration, preparation and enforcement of the European Commission's guidelines²⁵ under Article 28(4) of the DSA, with the aim of assisting online platforms in ensuring a high level of privacy, safety and protection of minors, as required by Article 28(1) of the DSA. The guidelines were published on 10 October 2025.

In addition, in 2025, the Working Group addressed, inter alia, the following issues:

- updates on the development of the EU age verification solution and exchanges regarding possible implementation approaches by Member States,
- the initiation of a coordinated information-sharing and enforcement approach by DSCs and competent authorities concerning pornographic platforms accessible to minors,
- enforcement initiatives by the European Commission and at national level,

²⁵ Guidelines on measures to ensure a high level of privacy, safety and security for minors online, in accordance with Article 28(4) of Regulation (EU) 2022/2065, *OJ C, C/2025/5519*, 10 October 2025.

- the strategy to implement the guidelines under Article 28 of the DSA,
- and the importance of closer cooperation between the DSCs and the Safer Internet Centres.

In 2025, the members of the Working Group met nine times. Additionally one joint meeting was held with the members of Working Group 2 to discuss a coordinated action to reinforce the protection of minors as regards pornographic platforms.

The BIPT (DSC) has actively contributed to this Working Group's activities, in particular to the consultation on the guidelines under Article 28(4) of the DSA, in the form of feedback on the draft text of the European Commission.

In the framework of Safer Internet Day 2025, members of the Working Group also participated in an online exchange with youth representatives and BIK Youth Ambassadors on cyberbullying, focusing on young people's experiences, reporting challenges, and the role of DSCs in protecting minors online.

In response to the European Commission's call for closer cooperation with the national Safer Internet Centres, the BIPT (DSC) joined forces in 2025 with the Belgian centre Betternet, in view of the co-organisation of the Belgian edition of the Safer Internet Day in February 2026.

7.3.2.7. Working Group 7 – Orders and criminal issues

Working Group 7 deals with various issues, in particular (i) orders for the removal of illegal content (Article 9 of the DSA) and (ii) orders for the provision of information (Article 10 of the DSA). Furthermore, the Working Group focuses on (iii) the cooperation in the context of the notification of suspicions of criminal offences (Article 18 of the DSA), (iv) cooperation with law enforcement authorities, and (v) broader issues related to illegal content, including the (EU) Code of Conduct on combating illegal hate speech on the Internet +²⁶.

In 2025, the Working Group met eight times and focused on one or two themes per session, for a thorough and coherent discussion.

In support of the work, national judicial and/or administrative authorities were invited to explain their practical experience and case studies. Audiovisual media authorities, judicial police units and Europol, among others, provided insight into implementation issues, delimitation of competences and best practices.

In addition, the Working Group developed several targeted questionnaires for systematic inventory and operational harmonisation. These regarded, among other things: (i) the different types of orders and the competent issuing authorities; (ii) the scope and modalities of the obligation under Article 18 of the DSA to notify the dedicated contact points (which facts are to be reported and according to which procedure); and (iii) the identification of potential flaggers of illegal content, etc.

In this context, the BIPT (DSC) acted as a committed dialogue partner, with qualitative, operationally usable input, which has fuelled the work.

In addition, the BIPT (DSC) was responsible for coordinating the distribution of questionnaires and consolidating the responses from the relevant national authorities, it organised bilateral consultations with various national competent authorities and took part in a technical bilateral work discussion with the Chair, Vice Chair of the Working Group and other staff of the European Commission in preparation of a working group on orders.

7.3.2.8. Working Group 8 – IT Issues

Working Group 8 is responsible for discussions on the commonly used IT Systems, the maintenance

²⁶ More information on the code of conduct to combat illegal hate speech on the Internet +: <https://digital-strategy.ec.europa.eu/en/library/code-conduct-counteracting-illegal-hate-speech-online>.

and further development of AGORA and discussion on any future ICT developments.

AGORA is the IT platform for information exchange set up by the Commission to support communication between the digital services coordinators, the Commission and the Council.

The issues discussed in 2025 during these Working Groups include developments of Article 40 of the DSA, the data access portal, the competent authorities access to AGORA, and interoperability with existing complaint handling systems (Art. 53 of the DSA).

The Working Group met three times in 2025.

7.3.3. European Board for Media Services (EBMS)

In 2025, the competent authorities, Medienrat, VRM and CSA also participated, in their capacity as 'national regulatory authority', in the meetings of the European Board for Media Services²⁷, established under the European Media Freedom act and succeeding the framework previously set up under the European Audiovisual Media Services Directive. While a least one competent authority followed each of the Board's working groups, the following provides a brief overview of the work carried out in these working groups.

A working group focused on safeguarding the integrity of the information space by monitoring the implementation of EU rules on disinformation, political advertising transparency, media literacy, and the European Media Freedom Act, while also strengthening cooperation with the Digital Services Board. Another working group worked on recommendations for the evaluation of the Audiovisual Media Services Directive and contributed to discussions on the protection of minors under the Digital Services Act. Meanwhile, another working group organized workshops and thematic meetings to improve coordination between regulators and EU bodies on issues such as disinformation, child protection, and illegal content online.

The European Board for Media Services also participated, inter alia, in the public consultation on the draft guidelines on the protection of minors online, within the meaning of Article 28(4) of the DSA.

8. Conclusion

The year 2025 marked the first full year in which the DSC and the competent authorities exercised their powers following the entry into force, on 9 January 2025, of the Act approving the cooperation agreement between the competent authorities and formally designating the BIPT as the DSC within the meaning of the DSA. Over the course of that year, the BIPT (DSC) in cooperation with the CAs, continued to develop and strengthen its system for handling complaints and orders. In this context, the BIPT engaged in dialogue with various authorities that issued orders to online platforms.

The past year confirms that the implementation of the Digital Services Act in Belgium is progressing steadily. Important steps were taken at national level, including the designation of three trusted flaggers which play a key role in supporting the more efficient identification and handling of illegal online content. At the same time, the number of complaints increased. This increase reflects growing awareness among end-user and improved accessibility of the system, while also highlighting the need for a high-performance and accessible enforcement framework. It is therefore encouraging to note that a large number of users were effectively helped after lodging their complaint.

For the future, cooperation remains a central pillar. Close coordination with the competent authorities, the European Commission and the Digital Service Coordinators of the other Member States will be

²⁷ The European Board for Media Services is an independent advisory body established by the European Media Freedom Act (EMFA), as a successor to ERGA (European Regulators Group for Audiovisual Media Services). See https://media-board.europa.eu/index_en.

further developed. Through continued vigilance, intensive cooperation and the ability to respond to new digital challenges, Belgium can continue to contribute to the effective implementation of the DSA.

In 2026, the BIPT will continue to focus on consolidating these foundations, further strengthening the enforcement capacity and increasing visibility and accessibility for users and stakeholders. This will support the continued development of a safe, transparent and reliable online environment for all.

Annexes

Annual Activity Report on the DSA of the four competent authorities



Annex 1 – 2025 Annual Activity Report on the DSA by the BIPT as competent authority

Annex 1 – 2025 Annual Activity Report on the DSA by the BIPT as competent authority

1. About the BIPT

The Belgian Institute for Postal Services and Telecommunications (BIPT) was established in 1991 as a semi-public body and was granted its own status under the Act of 17 January 2003.

The BIPT is the federal regulator for the electronic communications market, the postal market, the electromagnetic spectrum of radio frequencies and radio and television broadcasting in the Brussels Capital Region.

Electronic communications, postal services and media in the Brussels Capital Region are the main areas of activity. The BIPT's activities are guided by six main missions:

- promoting healthy competition and ensuring market access;
- contributing to the development of a domestic market with efficient networks and well-functioning services;
- protecting the interests of users, with a focus on social inclusion, a high level of protection, clear information and transparency;
- managing scarce resources such as radio frequencies and numbering resources;
- ensuring network security;
- promoting connectivity with and access to high capacity networks.

Since 25 May 2024, the BIPT has been one of the designated competent authorities in Belgium for the enforcement of the DSA (hereinafter 'the BIPT (CA)').

Since 9 January 2025 (entry into force of the Cooperation Agreement), the BIPT has been the Belgian Digital Services Coordinator or DSC (hereinafter 'the BIPT (DSC)'). Since the entry into force of the DSA, the BIPT has been actively involved in the national coordination of the monitoring of compliance with this Regulation by the different competent authorities.

This annual activity report mainly focuses on the tasks executed by the BIPT (CA). It does not cover the missions carried out as the Belgian DSC.²⁸ Regarding these missions, we invite you to read the aggregated annual activity report regrouping the input of the DSC (i.e. the BIPT (DSC)) and of the four competent authorities (i.e. the BIPT (CA), CSA, Medienrat and VRM).

2. Complaints (Article 53, DSA)

As the Belgian DSC under the DSA, the BIPT (DSC) coordinates and refers complaints to the relevant competent authority; it may also act as the competent authority (BIPT (CA)), i.e. investigate complaints, take decisions and, where necessary, impose sanctions.

Of the 65 complaints processed as formal complaints under Article 53 of the DSA, 62 were transmitted to DSCs in other Member States and 3 were assigned to the BIPT (CA), which was deemed competent to handle them. As such, the BIPT (CA) dealt with these three complaints in 2025.

The three complaints regarded the Telegram platform, which the BIPT (CA) contacted to request

For more information on the tasks assigned to the Belgian DSC, see Article 4, paragraph 2, of [the Act of 20 December 2024 approving the cooperation agreement of 3 May 2024 between the Federal State, the Flemish Community, the French Community and the German-speaking Community on the partial coordinated implementation of the DSA](#).

additional information regarding these specific cases.

The first complaint concerned the absence of a functional complaint mechanism (Article 16) on the one hand and a possible breach of obligations regarding trusted flaggers (Article 22) on the other hand;

The second complaint also concerned the absence of a functional complaint mechanism (Article 16) and the difficulties encountered by the user in contacting Telegram;

The third complaint concerned an alleged breach of Articles 17 and 20 of the DSA. As part of the investigation into this matter, a request for information was sent to Telegram in order to verify compliance with the aforementioned provisions. The analysis of the case had not been completed by the end of 2025.

Furthermore, in 2025, the BIPT (DSC) received 19 cases from the DSCs of other Member States concerning providers of intermediary services established in Belgium or having a legal representative in Belgium. As part of the initial assessment of these cases, requests for further clarification were sent to the DSCs that submitted the cases. Of these 19 cases:

- Seven of these cases were closed due to the lack of the necessary information or the absence of a response to our request for clarification or additional information.
- Nine of these cases are still ongoing and additional clarification was requested. These cases will be followed up in 2026.
- It should be noted that the three remaining complaints were indeed dealt with by the BIPT (CA).

The BIPT (CA) records that, in an important number of cases, the information and documentation provided was not sufficient to enable an assessment under Article 53 of the DSA. Requests for clarification and additional documentation often remain unanswered. This may indicate that the scope and functioning of the DSA are not yet fully understood by all stakeholders.

3. Orders (Articles 9 and 10, DSA)

Not applicable. In that respect, the BIPT acted as the Belgian DSC and not as a competent authority. Regarding the tasks assigned to the DSC, we invite you to read the aggregated annual report.

4. Out-of-court dispute settlement bodies (Article 21, DSA)

As indicated in the aggregated report, the BIPT received in 2025 no formal application for the status of out-of-court dispute settlement body. As a consequence, the BIPT, as a competent authority, took no decision in that respect.

5. Trusted flaggers (Article 22, DSA)

In accordance with Article 10, §1 of the Cooperation Agreement, the BIPT (DSC) receives all applications for the trusted flagger status. The BIPT (DSC) shall then designate the competent authority or authorities responsible for examining the request. In accordance with Article 10, §6 of the Cooperation Agreement, the request shall be examined by the designated competent authority, which shall subsequently also take the formal decision.

Upon examination of the applications, the BIPT (CA) operates in an accurate, objective and impartial manner. The BIPT (CA) assesses the criteria of Article 22 (3) in accordance with recital (61): in order

to preserve the added value of the trusted flagger mechanism, the status is reserved for and awarded to entities with particular expertise and competence to tackle illegal content and that work in a diligent, accurate and objective manner.

In this context, the BIPT shall treat any application in a uniform manner, with an open and transparent communication style. The BIPT website provides detailed information on the status of trusted flagger and the procedure for submitting an application with the DSC. In addition, the BIPT has an accessible and dynamic approach: regular meetings are organised to discuss the situation and to clarify requests for additional information in person should there be any.

A draft decision shall always be submitted to the BIPT Council for approval before it is communicated to the candidate for comments. Following the final decision awarding the status, the BIPT website shall be updated without delay and the European Commission shall be formally notified.

In 2025 the BIPT (CA) was designated to process three applications for the trusted flagger status. Two entities received a positive decision from the BIPT in 2025. The examination of the third request had not yet been completed in 2025.

The first entity to receive the status of trusted flagger by the BIPT (CA) on 12 November 2025 was the Centre for Equal Opportunities and Opposition to Racism (hereinafter 'Unia'). This status was awarded on the basis of Unia's acknowledged expertise in the field of online illegal speech, in particular discrimination, illegal hate speech and negationism. In addition to the BIPT (CA), two other competent authorities were also designated for the examination of this request, namely the Conseil Supérieur de l'Audiovisuel (hereinafter 'CSA') and the Medienrat.

The second entity to receive the status of trusted flagger was Child Focus. For this application, the BIPT acted as the sole designated competent authority. On 22 December 2025, the BIPT awarded the status of trusted flagger to Child Focus based on the latter's expertise in the field of online sexual exploitation of minors, in particular the non-consensual distribution of sexual or intimate content, the approaching of a minor for sexual purposes or 'grooming', 'sextortion', images of child sexual abuse, voyeurism, content of an extremely pornographic or violent nature and advertising fornication and prostitution of a minor.

In these cases the decisions were published within 48 hours of their adoption and submitted to the European Commission, in order for the trusted flaggers to be able to launch their activities under this new status immediately.

The third request for the status of trusted flagger was still pending in 2025, under the relevant procedure. The processing is conducted in accordance with the applicable legal and procedural provisions, subject to a careful, objective and impartial assessment. The requesting entity is informed of the progress of the case in accordance with normal practice.

6. Vetted researchers (Article 40, DSA)

In 2025, the BIPT did not receive formal applications under Article 40 of the DSA.

7. Enforcement and (inter)national activities

As regards the national and international activities (e.g. the Digital Services Board and working groups), the BIPT acted as the Belgian DSC and not as the competent authority. For tasks related to the DSC, we invite you to consult the aggregated annual report.



Annex 2 – 2025 Annual Activity Report on the DSA by the CSA as competent authority

Annex 2 – CSA’s Annual Activity Report on the DSA for 2025 as a competent authority

1. Introduction

In a federal state, implementing the Digital Services Act (hereinafter referred to as the “Act” or “DSA”) is, a relatively complex task given the nature of the Act: a cross-cutting legal instrument that must apply alongside sectoral legislation.

The Conseil supérieur de l’Audiovisuel (hereinafter “CSA”) is a “national regulatory authority” within the meaning of Article 30 of the Audiovisual Media Services Directive (hereinafter “AVMSD”), as well as one of the national regulatory authorities in Belgium within the meaning of the DSA.

The CSA intends to assume its new responsibilities and cooperate in good faith in the application of the regulation in Belgium.

Indeed, our media space needs regulation to protect users, particularly the most vulnerable, such as children, and businesses need a clear regulatory framework that allows for a balanced competition with large online platforms operating on an international scale.

As one of the four competent authorities for the DSA in Belgium, the CSA is in principle competent for all aspects of the regulation, particularly insofar as it concerns “intermediation services related to broadcasting activities” and where the provider is established in the French-speaking region or in the bilingual region of Brussels-Capital Region, in the latter case provided that the service is exclusively intended for the French-speaking Community.

Cooperation with the other authorities responsible for the DSA in Belgium and the Belgian Digital Services Coordinator (hereinafter “Belgian DSC” or Belgian Institute for Postal Services and Telecommunications, “BIPT”) is regulated in the cooperation agreement of May 3, 2024. This includes procedures for consultation and information exchange, in particular with regard to the handling of complaints, the certification of out-of-court dispute resolution bodies, the granting of “trusted flagger” status, the granting of vetted researcher status, and participation in meetings of the European Board for Digital Services (hereinafter “Board”).

As part of its remit, the CSA has investigative powers and the ability to impose sanctions, such as administrative fines. Decisions are taken by the “Collège d’autorisation et de contrôle”.

2. Complaints (art.53 DSA)

The CSA received four complaints, three of which were forwarded to the BIPT. The fourth complaint is pending while awaiting additional information from the complainant. The complaints concerned TikTok, Meta, and Vivastreet, and addressed issues related to the protection of minors and account removal.

3. Injunctions (art. 9 et 10 DSA)

Not applicable during the year in question.

4. Out-of-court dispute settlement bodies (art. 21 DSA)

Not applicable during the year in question.

5. Trusted Flaggers (art.22 DSA)

On October 14, 2025, the CSA granted Unia (an independent inter-federal public institution that fights discrimination and promotes equality, formerly known as the Center for Equal Opportunities) the status of "trusted flagger" within the meaning of Article 22 of the DSA. This status allows Unia to report potentially illegal content to online platforms, ensuring that these reports receive priority treatment from platforms. The granting of official trusted flagger status to Unia reinforces the framework for combating hate speech and discrimination online.

The CSA took note of another application for trusted flagger status which was submitted in 2025. The application is currently under review.

6. Vetted Researchers (art.40 DSA)

Not applicable during the year in question.

7. Other

7.1. National activities

The CSA works closely with the Belgian DSC and other competent Belgian authorities (Vlaamse Regulator voor de Media and Medienrat) to coordinate the application of the DSA in Belgium. In 2025, the CSA participated in several meetings to ensure the proper implementation of the regulation at national level.

2025 was the first full year of the application of the DSA in Belgium. With the entry into force of the cooperation agreement designating the competent authorities on January 9, 2025, the CSA was able to fully assume its role as regulator of online platforms.

7.2. International activities

7.2.1. European Board for Digital Services activities

In 2025, the CSA participated regularly in the European Board for Digital Services meetings together with the Belgian DSC in line with the rotation system among the competent authorities. The Board meetings were preceded by preparatory meetings among the DSC and competent authorities.

In addition, the CSA contributed to the work of two working groups (WGs): the work of WG4 on integrity of information space, and WG6 on the protection of minors.

- *WG 4: Integrity of the information space:*

In cooperation with DSC, CSA activities developed in five complementary perspectives:

1. Protection of the integrity of electoral processes through the implementation of election guidelines, the development of an Elections Toolkit as a collection of best practices for DSC

engagement and supporting the implementation of the Transparency and Targeting of Political Advertising Regulation.

2. Countering foreign information manipulation and interference (FIMI) and enforcement of the Democracy Shield through the scoping and proposal of measures related to defending the EU and member states against FIMI operations.
 3. Addressing the dissemination or mis/disinformation and other civic discourse issues through discussions on emerging and recurrent issues related to or following crises, the regular monitoring and evaluation of Code of Practice, Conduct on Disinformation, and the exploration of the role of recommender systems and AI as a risk factor for information integrity related systemic risks.
 4. Contributing to protecting media freedom and media pluralism, supporting freedom of expression and information
 5. Attempting to build a strong and meaningful cooperation with Media Board WG 5 equally named "Integrity of the information space".
- *WG6: Protection of minors:*

The CSA participated in the nine meetings organized within Working Group 6 concerning the application of the DSA regarding the protection of minors. The group's work focused on the following areas in 2025:

1. following of the development of the age verification application promoted by the Commission, which will be interoperable with the future EU Digital Identity Wallet.
2. discussions prior to the adoption of the guidelines for Article 28, paragraph 1 of the DSA on the protection of minors, and a plan for the implementation of these guidelines by platforms in Member States.
3. Alongside the regulation of the VLOPEs addressed by the European Commission, the DSCs have initiated regulatory action against other platforms that make pornographic content accessible to minors for which a dedicated Task Force have been created. The DSCs informed their counterparts of their progress during WG6 meetings.
4. Finally, at the occasion of the Safer Internet Day WG6 held a meeting to address the specific topic of cyberbullying.

7.2.1. Activities of the European Board for Media Services (EBMS)

The European Board for Media Services gathers representatives of national regulatory authorities (NRAs) competent for audiovisual media services and VSPs. The CSA as member of the EBMS followed all working groups (WGs), including the ones responsible for cross-cutting issues such as WG5 on integrity of the information space, and WG1 on Audiovisual media matters, and finally WG4 on the Evolution of the media regulatory framework.

- *WG 5: Integrity of the information space:* Main activities of WG 5 consisted in monitoring of the implementation of the Code of Practice on Disinformation now converted into a Code of Conduct under Article 45 of the DSA²⁹ (WS1), monitoring the implementation of the Regulation on

²⁹ As representatives of the Media Board in the permanent task force of the Code, the CSA was particularly active in the conversion

transparency and targeting of political advertising (WS4), coordination and exchange on media literacy activities (WS3) and providing support to the European Commission and Media Board members in the application of the European Media Freedom Act (EMFA), notably in terms of exchange of best practices on the prominence of audiovisual media services of general interest (WS2). Finally, the Media board WG 5 attempted to build a strong and meaningful cooperation with Digital Board WG 4 equally named "Integrity of the information space".

- *WG1: Audiovisual media matters:* The work group 1, chaired by the CSA, developed recommendations on the ex-post evaluation of the Audiovisual Media Services Directive in cooperation with WG4, including its interaction with other European legislation such as the Digital Services Act. Furthermore, in order to support the strategic priority of the Media Board regarding the protection of minors, the working group provided national regulatory authorities (NRAs) views regarding the Commission guidelines on article 28 DSA.
- *WG4: Evolution of the media regulatory framework:* Additional activity of WG4 constituted of organizing workshops to set the basis of procedures and handovers between NRAs, the European Digital Services Board and the European Commission and follow-up thematic meetings in the area of disinformation, protection of minors and dissemination of illegal content.

process as well as the establishment of a rapid Risk Response System for national elections.

Annex 3 – 2025 Annual Activity Report on the DSA by the Medienrat as competent authority

Annex 3 – Medienrat’s Annual Activity Report on the DSA for 2025 as a competent authority

1. About the Medienrat

1.1. Mandate and scope under the DSA

The Medienrat of the German-speaking Community is the independent regulatory authority for media services. In the Belgian understanding, this includes audio services, audiovisual services, and video sharing platform services – thus also intermediary services such as hosting services³⁰. It is responsible for the content and technical aspects of these media services. Therefore, the networks and services used for their transmission within the German-speaking Community of Belgium fall under the jurisdiction of the Medienrat³¹. The Medienrat is based in Eupen.

The Medienrat was established in 2000 as an advisory body. In 2005, it became a regulatory authority and is currently governed by the Decree of 1 March 2021 on Media Services and Cinema Screenings (Media Decree 2021). It consists of a decision-making chamber with up to four members appointed by government decision, and an office composed of specialized staff who support the Council in preparing its decisions. In 2025, the Medienrat completed the restructuring of its office and hired additional staff, counting now 3.15 full-time equivalent (FTE) staff.

As an independent national regulatory authority, the Medienrat applies the provisions of the Media Decree 2021 to media services – such as audiovisual media services, audio media services, and video sharing platform services – whose providers are established in the German-speaking Community of Belgium. It ensures compliance with these provisions and monitors, in particular, the protection of minors, media pluralism, and advertising. The Medienrat is entitled to impose administrative sanctions in the event of non-compliance with the Media Decree 2021.

Furthermore, the Medienrat cooperates with other Belgian media regulatory authorities, including the Conseil Supérieur de l’Audiovisuel (CSA), the Vlaamse Regulator voor de Media (VRM), and the Belgian Institute for Postal Services and Telecommunications (BIPT). Together with these authorities, the Medienrat forms the Conference of Regulators for Electronic Communications Networks, which cooperates in regulating electronic communications networks and services, notably regarding market analyses.

In addition, the Medienrat is a member of the European Board for Media Services (EBMS) and is designated as the competent authority for the implementation of the European Media Freedom Act (EMFA). The Medienrat is also member of the European Platform of Regulatory Authorities (EPRA).

The Medienrat is one of the four competent authorities for the implementation of the DSA (Art. 49 DSA) and is responsible for media services that are intermediary services. The cooperation with BIPT, CSA,

³⁰ Avis 74.816/VR-4 du Conseil d’Etat section législation du 20 décembre 2023 sur un avant-projet de loi ‘mettant en œuvre le règlement (UE) 2022/2065 du Parlement européen et du Conseil du 19 octobre 2022 relatif à un marché unique des services numériques et modifiant la directive 2000/31/CE, portant modifications du livre XII et du livre XV du Code de droit économique et portant modifications de la loi du 17 janvier 2003 relative au statut du régulateur des secteurs des postes et des télécommunications belges’

³¹ Artikel 130 §1 Nr. 1 Belgische Verfassung; Artikel 4 Nr. 6 Sondergesetz vom 8. August 1980 zur Reform der Institutionen; Artikel 4 §1 Gesetz vom 31. Dezember 1983 über institutionelle Reformen für die Deutschsprachige Gemeinschaft sowie artikel 101 §3 und 138 Dekret vom 1. März 2021 über die Mediendienste und die Kinovorstellungen (Mediendekret 2021).

and VRM is based on the cooperation agreement of 3rd May 2024 that took effect on 9th January 2025³².

1.2. Organisational setup and resources

For the implementation and application of the Digital Services Act (DSA), the Medienrat is supported, in addition to its four non-executive members, by a total of 3.15 full-time equivalent staff (FTE). These human resources support the decision-making chamber and cover key functions, namely a head of the office, a European coordinator, a legal advisor, and a position responsible for frequency-related matters.

The professional development of the staff involved is ensured on an ongoing basis through on-the-job training, with a particular focus on the practical application of the new EU legal framework and on cooperation at national and European level.

For the operational support of its DSA supervisory tasks, the Medienrat uses the exchange of information platform provided by BIPT, which serves as a central tool for procedures, information exchange and coordination.

2. Complaints (Article 53 DSA)

2.1 Intake and handling process

During the 2025 reporting year, the Medienrat has not received a qualified complaint by Article 53 DSA.

3. Orders (Articles 9 and 10 DSA)

No orders have been received/processed in 2025.

4. Out-of-court dispute settlement bodies (Article 21 DSA)

During 2025, the Medienrat did not receive any applications for the certification of out-of-court dispute settlement bodies under Article 21 DSA.

5. Trusted flaggers (Article 22 DSA)

Through decision on the 12th of November 2025, the Medienrat recognized Unia (www.unia.be) as a trusted flagger. Unia is an independent public institution that promotes equality and combats discrimination. The Medienrat has announced on 18th of November³³ that Unia is responsible as trusted flagger for the discrimination, hate speech and negationism respectively in the online environment for the territory of the German-speaking Community. Currently, the Medienrat is processing one additional application.

³² Zusammenarbeitsabkommen vom 3. Mai 2024 zwischen dem Föderalstaat, der Flämischen Gemeinschaft, der Französischen Gemeinschaft und der Deutschsprachigen Gemeinschaft zur koordinierten Teilumsetzung der Verordnung (EU) 2022/2065 des Europäischen Parlaments und des Rates vom 19. Oktober 2022 über einen Binnenmarkt für digitale Dienste und zur Änderung der Richtlinie 2000/31/EG (Gesetz über digitale Dienste).

³³ <https://www.medienrat.be/unia-als-vertauenswuerdiger-hinweisgeber-anerkannt/>

6. Vetted researchers (Article 40 DSA)

During the 2025 reporting year, the Medienrat did not receive any applications for the granting of vetted researcher status under Article 40 DSA. The Medienrat has communicated on its website³⁴ that applications are possible and will, where necessary, coordinate the procedural steps with the DSC.

7. Enforcement and (inter)national activities

7.1 National activities

The Medienrat acts as a competent authority alongside BIPT, the CSA and the VRM. Cooperation between the authorities is set out in the Cooperation Agreement of 3 May 2024.

Under this agreement, the Medienrat is entrusted - taking into account the allocation of competences in Belgium - with carrying out the following tasks³⁵: The Medienrat acts as a contact point and forwarding authority for official information requests, regulatory notifications, data requests, user complaints, and judicial cooperation requests within the meaning of Articles 21, 22, 40, 53 and 82 of the DSA Regulation. In doing so, it operates within the Belgian distribution of competences, meaning solely for the territory of the German-speaking Community and only within the areas legally assigned to the German speaking community of Belgium.

At national level, the Medienrat participated in a wide range of activities. In particular, it took part in regular coordination and working meetings between the four competent Belgian authorities, organised by BIPT.

Against this background and building on experience from handled complaints and the application of Article 10 of the Cooperation Agreement, the DSC, together with the competent authorities, developed internal procedural rules. On that basis, the Medienrat adopted internal rules on 28 January 2025 applying those procedural rules and clarifying when the Medienrat intervenes. As a result, complaints that fall outside the scope of the DSA are not forwarded to BIPT (as DSC).

Before EBDS meetings – and following the 'Prep call with the European Commission' - a national meeting entitled 'Meeting Among Heads' takes place between the DSC and the competent authorities to coordinate the Belgian position for the EBDS. The Medienrat participated in all eight 'Meeting Among Heads' meetings.

The processing of the first trusted flagger application required coordination among the competent Belgian authorities to develop information-exchange procedures under the cooperation agreement, as well as the initial establishment of internal procedures within the Medienrat for handling such requests. To this end, several coordination meetings were held, including meetings involving applicants, to clarify roles, responsibilities and procedural arrangements. Following this process, the Medienrat recognised Unia as a trusted flagger on 12th November 2025 and is currently handling a further application.

The Medienrat also announced that applications may be submitted for vetted researcher status and informed about the designation of certified dispute settlement bodies. To date, no applications have been received under these procedures.

The Medienrat took part in two meetings with the Representation of the European Commission in Belgium, one together with the Belgian regulators, and one with the group of Belgian stakeholders on

³⁴ <https://www.medienrat.be/forscher-erhalten-zugang-zu-plattformdaten-dank-dsa>

³⁵ Article 4, paragraph 7, second subparagraph, of Zusammenarbeitsabkommen vom 3. Mai 2024

the topic of the protection of minors.

In January/February 2025, the Medienrat issued a press release about the integration of the revised Code of conduct+ on countering illegal hate speech online into the framework of the DSA. In this context, the Medienrat also gave a radio interview on the public broadcaster in the German-speaking Community (BRF) and informed about the complaint procedure in the frame of the DSA. In September 2025, the Medienrat has published a new website with a independent section with information on the DSA (rights of users, trusted flagger, out-of-course settlement, vetted researcher etc.). All these activities aimed in building public awareness for the DSA.

On the occasion of the double anniversary of the Medienrat – 25 years Medienrat, 20 years a regulatory authority – the Medienrat of the German-speaking Community invited to the colloquium in Eupen: „Media regulators in the digital society: between content and network regulation – *Concepts, powers, legal status and resources, roles and tasks, cooperation*“ in collaboration with the Centre de Recherche Information, Droit et Société (CRIDS / NaDI) of the University of Namur. Around 45 participants from Europe, in particular representatives of regulatory authorities, took part in the colloquium. Indeed, in recent years, not only the media landscape but also the legal framework for regulation has changed. Regulators are facing new challenges with new tasks, forms of cooperation and instruments. The DSA is part of this evolution. During the event, the cross-border cooperation at all levels was emphasized. The exchange of good practices, coordination among regulators and clarity in European legislation are necessary for media regulatory authorities to fulfil their role in a digital society. The application of the DSA will play its role in this development.

7.2 European and international activities

European Board for Digital Services (EBDS)

At European level, the Medienrat participated, together with the DSC and the other competent authorities, in one EBDS meeting. The Medienrat did, however, participate in all 'Prep call with the European Commission' meetings.

It should be noted that the DSC is accompanied on site at EBDS meetings by one competent authority, designated according to a rotation system among the competent authorities. The rotation system is the same as the one applied for the EBMS, i.e. VRM chaired during the first half of the year and, since 1 July, the CSA has assumed the annual chair.

The Medienrat also participated in the technical meetings held at Working Group level.

Regarding working groups, the various competent authorities participate - together with the Belgian DSC - in the different EBDS working groups. The Medienrat is a member of Working Group 1 - Horizontal and legal issues (WG1) and Working Group 2 - Cooperation (WG2). WG1 addresses legal questions, such as the classification of platforms and the interpretation of the DSA. By contrast, WG2 covers topics such as cross-border complaint handling and the development of a common communication strategy.

In this context, the Medienrat participated in all eight meetings of WG1, in the joint meeting with WG4 - Integrity of Information Space, and in all eight regular WG2 meetings as well as the joint meeting with WG6-Protection of Minors.

8. Conclusion and outlook for 2026

In 2026, the Medienrat's work within the framework of the implementation Digital Services Act (DSA) and the European Board for Digital Services (EBDS) will continue on a high level. Working Group 1 (Horizontal and Legal Issues) and Working Group 2 (Working Together) will remain central to ensuring a coherent EU-wide implementation of the DSA. The Medienrat will maintain its active involvement in

both groups to support legal harmonisation and operational coordination, while also highlighting the specific challenges faced by a small regulator with significant cross-border exposure.

In parallel, the Medienrat will further advance its strategic approach to the DSA, with the aim of strengthening its visibility and recognition as a clear point of contact for complaints under Article 53 DSA. Particular focus will be placed on public awareness and guidance initiatives, including targeted communication measures aimed at users and stakeholders. In this context, the Medienrat will also seek to build on existing awareness-raising opportunities – such as an event in the frame of the Safer Internet Day – to emphasise its role in the DSA complaint-handling framework and promote the safe and lawful use of online services.

VLAAMSE
REGULATOR
VOOR DE MEDIA

Onafhankelijk toezichthouder voor
de Vlaamse audiovisuele media

Annex 4 – 2025 Annual Activity Report on the DSA by the VRM as competent authority

Annex 4 – 2025 Annual Activity Report on the DSA by the VRM as competent authority

1. Presentation

The Flemish Media Regulator (VRM) was designated as a competent authority within the meaning of Article 49 of the DSA by decree of 26 January 2024.³⁶

The VRM was established on 16 December 2005 as an agency of the Flemish government with the mission of enforcing the media law within the Flemish Community of Belgium, in the light of the assigned competence of the Communities in Belgium for both content and technical aspects of broadcasting activities.³⁷

The VRM is primarily a 'national regulatory authority' in accordance with Article 30 of the European Audiovisual Media Services Directive, but is also one of the national regulatory authorities in Belgium, within the meaning of the European Electronic Communications Code.³⁸

As one of the four competent authorities for the DSA in Belgium, the VRM is in principle competent for all aspects of the DSA, insofar as it concerns 'intermediary services relating to broadcasting activities' and whose provider is established in the Dutch-speaking region or in the bilingual region of Brussels-Capital, in the latter case provided that the service is exclusively aimed at the Flemish Community.

The cooperation with the other competent authorities for the DSA in Belgium and the Belgian digital services coordinator (BIPT) is governed by a cooperation agreement of 3 May 2024, which entered into force on 9 January 2025.³⁹ It includes procedures for consultation and exchange of information, in particular as regards handling complaints, certifying out-of-court dispute settlement bodies, granting the status of 'trusted flagger', granting the status of vetted researcher and attending the meetings of the European Board for Digital Services.

In the context of its tasks, the VRM has investigative powers and the competence to impose sanctions, such as administrative fines.⁴⁰ The decisions are taken by the 'General Chamber' and the 'Chamber for Impartiality and Protection of Minors'. The VRM administration has 21 staff members, one of whom is dedicated to the supervision and enforcement of the DSA.

³⁶ Decree of 26 January 2024 amending the Decree of 27 March 2009 on radio broadcasting and television partially implementing the Digital Services Act, *Belgian Official Gazette* of 16 February 2024.

³⁷ Decree of 16 December 2005 on the establishment of the public-law designed external autonomous agency Flemish Media Regulator and amending certain provisions of the decrees on radio broadcasting and television, *Belgian Official Gazette* of 30 December 2005 and Decree of 27 March 2009 on radio broadcasting and television (the Media Decree), *Belgian Official Gazette* of 30 April 2009, in particular Article 218.

³⁸ Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive), *OJ* 95 15 April 2010, p. 1.

Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code, *OJ L* 321 17 December 2018, p. 36.

³⁹ Cooperation Agreement of 3 May 2024 between the Federal State, the Flemish Community, the French Community and the German-speaking Community on the coordinated partial implementation of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act), *Belgian Official Gazette* of 30 December 2025.

⁴⁰ See in particular Article 228 et seq. of the Media Decree.

2. Complaints (Article 53, DSA)

The VRM received one complaint in 2025, in which the complainant referred to the DSA, which the VRM sent to the BIPT for analysis, in its role as digital services coordinator, in accordance with the above-mentioned cooperation agreement. However, on that basis, it was ruled that the complaint was not related to the DSA (in particular because the complaint was directed against a website with gaming apps, which could not be considered a provider of an intermediary service).

In 2025, the VRM did not receive or handle any further complaints within the meaning of Article 53 of the DSA.

3. Orders (Articles 9 and 10, DSA)

The orders issued by Belgian judicial or administrative authorities as referred to in Articles 9 and 10 of the DSA are centralised by the digital services coordinator (BIPT).

4. Out-of-court dispute settlement bodies (Article 21, DSA)

In 2025, the VRM did not receive or process any official requests to certify out-of-court dispute settlement bodies within the meaning of Article 21 of the DSA.

5. Trusted flaggers (Article 22, DSA)

In 2025, the VRM granted the status of 'trusted flagger', within the meaning of Article 22 of the DSA, to the Flanders Human Rights Institute ('*Vlaams Mensenrechteninstituut*').⁴¹

The official application to be awarded the status of 'trusted flagger' was submitted to the BIPT by the Flanders Human Rights Institute on 10 January 2025. In its role as digital services coordinator, the BIPT, in accordance with the above-mentioned cooperation agreement, then assigned the request (of the Flanders Human Rights Institute) for treatment to the VRM as the competent authority for the DSA within the Flemish Community.

After examining the application, in particular the three conditions that entities must demonstrate to meet in order to obtain the status of 'trusted flagger', the General Chamber of the VRM awarded the status of 'trusted flagger' to the Flanders Human Rights Institute by decision of 13 October 2025.

The (Flanders Human Rights) Institute obtained the status of trusted flagger for online illegal content related to human rights under the Flemish competences and the equal treatment of persons (incl. persons with disabilities).

In accordance with the Belgian cooperation agreement, this decision of the VRM was shared with the BIPT, as the Belgian digital services coordinator, and the other competent authorities for the DSA in Belgium.

⁴¹ See VRM Decision No 2025/048 of 13 October 2025.

6. Vetted researchers (Article 40, DSA)

In 2025, the VRM did not receive or process any official requests to grant the status of vetted researcher.

7. Enforcement and (inter)national activities

7.1. National activities

In the first place, the VRM has dedicated a separate section on its website to information about the DSA, in particular about the scope, (the tasks of) the competent authorities in Belgium and the role of the European Commission.⁴² In 2025, this information was further complemented and updated (e.g. on access to data for vetted researchers, EU-certified out-of-court dispute settlement bodies and the Code of Conduct on Countering Illegal Hate Speech Online +).

The VRM has also subsequently provided further clarification on the DSA by answering further requests for information and has participated, often together with the other competent authorities for the DSA in Belgium, in information meetings with various stakeholders (e.g. on the protection of minors online).

In 2025, the VRM also had frequent consultations and meetings, in particular in light of the entry into force of the Belgian cooperation agreement on 9 January 2025, with the other competent authorities for the DSA and the digital services coordinator of Belgium to exchange information, coordinate on the enforcement of the DSA in Belgium and prepare European meetings.

7.2. International activities

In 2025, the VRM participated, alongside the Belgian digital services coordinator (BIPT), in the meetings of the European Board for Digital Services, insofar as the restrictions on the number of participants per Member State allowed this and, if necessary, according to a rotation system among the competent authorities of the Communities of Belgium. The VRM was also a member of one of the working groups (*i.e.* 'working group 3 – content moderation and data access') within the European Board for Digital Services and in that context participated in the various working group meetings.

Furthermore, in 2025, the VRM also participated, in its capacity as 'national regulatory authority' in accordance with the European Audiovisual Media Services Directive, in the meetings of the European Board for Media Services.⁴³ A specific working group focused on the evolution of the media regulatory framework in the EU and in particular the relationship between (the procedures of) the DSA and the Audiovisual Media Services Directive. The European Board for Media Services also participated, *inter alia*, in the public consultation on the draft guidelines on the protection of minors online, within the meaning of Article 28(4) of the DSA.

⁴² See <https://www.vlaamseregulatormedia.be/nl/digitaledienstenverordening-dsa>.

⁴³ The European Board for Media Services is an independent advisory body established by the European Media Freedom Act (EMFA), as a successor to ERGA (European Regulators Group for Audiovisual Media Services). See https://media-board.europa.eu/index_en.