

# Annual activity report on the application of Regulation (EU) 2022/2065 on digital services (DSA) in Belgium – 2024 –

(Pursuant to Article 55 of the DSA)

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



*in collaboration with the other Belgian competent authorities:*



# Foreword

Dear reader,

The year 2024 was all about preparation and cooperation regarding the implementation of the Digital Services Act (DSA)<sup>1</sup>. Although the DSA has been in force since 17 February 2024, this year has been mainly characterised by the foundations laid for effective enforcement. Despite the late entry into force of the cooperation agreement allowing the designation of the BIPT as Digital Services Coordinator, or DSC, as well as a complete implementation of the regulation, in strong collaboration with all competent authorities – the Belgian Institute for Postal Services and Telecommunications (BIPT), the Conseil Supérieur de l’Audiovisuel (CSA), the Medienrat and the Vlaamse Raad voor Media (VRM) –, the BIPT took a proactive approach by consulting closely with numerous stakeholders and by establishing essential procedures with national and international partners.

Despite the late adoption of the complete regulatory framework at national level, entered into force on 9 January 2025, this proactive approach allowed to intervene effectively in cooperation with other authorities. In that respect, following a complaint from the Netherlands against Telegram, an online platform that was used to dangerously expose the personal data of female students, on the one hand, and complaints regarding the broadcasting of Russian channels in violation of European regulations on the same platform, on the other hand, the situation was solved for the complainants and the channels concerned were deleted thanks to the intervention of the BIPT and the collaboration with the Dutch and Estonian DSCs.

Although these first achievements were significant, we realise that this is only the tip of the iceberg. We recognise that a number of communications that should have been sent to the BIPT, in its capacity as the Belgian DSC, were not sent, probably due to a lack of awareness of the obligations or late implementation by certain authorities, as required by Articles 9 and 10 of the DSA. In the case of a platform such as Telegram, which is monitored by the BIPT and the other competent authorities (CSA, Medienrat and VRM) according to their respective areas of competence, it is difficult to provide a precise estimate of the number of notices made directly to the platform without communication to the DSC. However, it is to be expected that the increase resulting from a potential systematic communication to the DSC would constitute a significant increase that could prove massive. The increasing compliance by the platforms, the clarifications that will be provided by the European Commission and the European Board on certain points of implementation, the gradual intensification of cooperation with the Member States’ DSCs, the Belgian national administrative or judicial authorities, the cooperation with trusted flaggers, and the public’s growing awareness of this new protection are all factors that will create momentum and a substantial workload.

We would like to thank all those who contributed to these efforts in 2024 and invite you to learn more about the accomplishments and challenges of the past year in this report.

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<sup>1</sup> [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](#), published on 27 October 2022

# Summary

This document is the Belgian Digital Services Coordinator's first annual report on its activities under the [Digital Services Act \('DSA'\)](#), which came into effect on **17 February 2024**. This European regulation introduces harmonised rules to create a **safe, predictable and reliable online environment** for users<sup>2</sup>.

In Belgium, **four competent authorities** oversee the enforcement of the DSA on intermediary services:

- The **Belgian Institute for Postal Services and Telecommunications ('BIPT')**, as the competent authority for the federal level;
- The **Conseil supérieur de l'audiovisuel ('CSA')**, as the competent authority for the French Community;
- The **Medienrat**, as the competent authority for the German-speaking Community;
- The **Vlaamse Regulator voor de Media ('VRM')**, as the competent authority for the Flemish Community.

The BIPT has also been designated as the **Digital Service Coordinator ('DSC') for Belgium**.

## National and European Cooperation

Given Belgium's institutional structure, a **cooperation agreement** was signed on **3 May 2024**, between the federal government and the Communities to ensure a coordinated implementation of key aspects of the DSA.

This report details the activities of the BIPT as the Belgian DSC, along with an annex covering the actions of all four competent authorities.

Although the BIPT was not officially designated as DSC until **30 December 2024**, it had already proactively undertaken several key tasks as the Belgian prospective DSC.

At the European level, the BIPT collaborated in 2024 (from 17 February 2024 to 31 December 2024) with other DSCs and the European Commission, including:

- **Attending, as an observer, the fourteen meetings, including two ad hoc meetings, of the European Board for Digital Services ('the Board')** before its official designation. The Board serves as a platform for fostering compliance, enhancing cooperation, and ensuring the effective implementation of the DSA. The Board, composed of all designated DSCs, is chaired by the European Commission and advises the European Commission and DSCs on supervisory matters and emerging challenges in digital services;
- Participating in meetings of the **Board's eight working groups**, which address specific regulatory issues and prepare documentation;
- **Monitoring compliance by several providers of intermediary services, including Telegram in particular**, which falls under Belgian jurisdiction as their legal representative is based in Brussels and the average number of monthly recipients of this platform has not reached the threshold of 45 million above which the Commission exercises its jurisdiction.

## Complaint handling and recognition of key stakeholders

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<sup>2</sup> See for example the Commission's official communication: [DSA: Making the online world safer | Shaping Europe's digital future](#)

The report provides insights into DSA-related complaints received by the BIPT, the CSA, the Medienrat, and the VRM.

The competent authorities are also responsible for the official recognition of key entities supporting DSA implementation including:

- **Trusted flaggers** (Article 22 of the DSA): independent organisations that identify, assess, and report illegal content on online platforms, whose notifications must be prioritised.
  - In 2024, no trusted flaggers were officially certified due to the pending European guidelines and the BIPT's formal designation as the Belgian DSC in early 2025. However, exploratory meetings with potential candidates were initiated.
- **Vetted researchers** (Article 40 of the DSA): researchers that are granted access to the data of very large online platforms and very large online search engines, to detect systemic risks and evaluate risk mitigation measures adopted by them.
  - In 2024, no official applications were received, but informal discussions were held.
- **Out-of-court dispute settlement bodies** (Article 21 of the DSA): entities mediating in disputes between users and online platforms.
  - In 2024, no applications were submitted in this category.

### Enforcement and compliance orders

Throughout the past year, the BIPT engaged, as DSC, with **national administrative and judicial authorities** empowered to **issue orders under Articles 9 and 10 of the DSA**.

The **BIPT centralises information** on orders issued by Belgian authorities requiring service providers to act against illegal content and to provide information about one or more individual recipients of the intermediary services.

### Conclusion

Since the DSA only came into effect on 17 February 2024, the first edition of the report provides a **preliminary overview** of its implementation in Belgium. Although the number of complaints and orders is limited, the implementation of the DSA has addressed the problems reported to the BIPT, thus addressing the resulting harm. Further developments, including the recognition of key stakeholders and the full deployment of enforcement mechanisms, are expected in 2025.

The document contains the aggregated annual activity report, in which the BIPT, as the DSC, has integrated all contributions from the various competent authorities into one comprehensive report. This report covers the key activities regarding the DSA for 2024, covering the period from 17 February 2024 till 31 December 2024. It includes a general introduction, updates on complaints, orders, certifications, enforcement and both national and international activities. In addition, the four reports of the competent authorities are provided in an Annex. Each of the following authorities submitted a report: the BIPT, the CSA, the Medienrat and the VRM.

Regarding the content of the individual annual reports, each authority is responsible not only for the drafting and the accuracy of the information in its own report but also for the relevance of the elements extracted from it for the inclusion in the aggregated annual activity report.

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# Aggregated Annual Activity Report on the DSA for Belgium in 2024

*'Together, for a safer, more transparent, and  
better-regulated digital space.'*

Aggregated by the Belgian Digital Services Coordinator



based on contributions of the four Belgian competent authorities



## 1. Introduction

### 1.1. General introduction DSA

The DSA provides harmonised rules for a safe, predictable and trusted online environment when interacting with 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 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 fully in force since 17 February 2024.

The DSA is enforced by the national DSCs, other national regulators designated as competent authorities in their Member States and for VLOPs and VLOSEs (together, 'VLOPSEs') by the European Commission.

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

This agreement designates the BIPT as the national DSC, lays down the respective tasks of the coordinator and the other competent authorities and the rules applicable to their cooperation. This agreement was published in the Moniteur Belge on 30 December 2024 and entered into force on 9 January 2025.

The four designated competent authorities are:

- the BIPT (federal level), designated by the [Act of 21 April 2024](#),
- the CSA (French Community), designated by the [Decree of 15 February 2024](#),
- the Medienrat (German-speaking Community), designated by the [Decree of 14 December 2023](#),
- the VRM (Flemish Community), designated by the [Decree of 26 January 2024](#).

Pursuant to Article 49, this means that, together with the CSA, Medienrat and VRM, the BIPT is responsible for monitoring and enforcing the DSA. Simultaneously, in its role as DSC, the BIPT is in charge of coordinating these matters in Belgium and contributing to the effective and consistent supervision and enforcement of the DSA across the entire Union.

To facilitate and enhance cooperation among Belgium's designated competent authorities and the Belgian DSC, Article 5 of the cooperation agreement establishes the framework for setting up an information-sharing system accessible to all relevant parties (including the BIPT, the CSA, the Medienrat, and the VRM). This system will enable these authorities to register cases, track their progress in real time, and, where applicable, document any decisions taken.

The first phase of this development, carried out in 2024, focused on defining internal processes related to various aspects of the DSA, such as complaint handling, upcoming certification requests, and participation in the Board and working groups. This stage, marked by extensive discussions and reflections, helped the Belgian DSC and competent authorities identify key functional and operational needs. In 2025, these processes will be refined and effectively translated into IT solutions, ensuring an efficient and high-performing system that strengthens national coordination and cooperation.

The development of this system is ongoing under the supervision of the BIPT, acting as the Belgian DSC. In the meantime, the exchange of information between the competent authorities and the DSC

continues through alternative channels.

## **1.2. Context**

Article 55 of the DSA requires every DSC to draw up and publish an annual report detailing its activities during the past year. The report must include information on complaints received under Article 53 of the 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, in accordance with Articles 9 and 10 of the 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 of 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 report incorporates all relevant information and data as provided by the DSC as well as the other designated competent authorities, ensuring full compliance with the obligations of Article 55(3) of the DSA.

This annual report describes the tasks carried out by the BIPT and the other competent authorities in 2024. All activities carried out up to and including 31 December 2024 were taken into account.

As indicated in the executive summary, regarding the content of individual annual reports, each authority is responsible not only for drafting and ensuring the accuracy of the information in its own report, but also for the relevance of the elements extracted from it to be included in the single annual activity report.

## **2. Complaints (Article 53 of the DSA)**

### **2.1. Introduction**

Article 53 of the 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 lodged with the Member State's DSC where the service recipient 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, accompanied by an opinion where considered appropriate. Where the complaint falls under the responsibility of another competent authority in its Member State, the DSC receiving the complaint shall transmit it to that authority.

### **2.2. Complaints in 2024**

During 2024, the BIPT set up a team and internal processes to follow up on complaints.

In that same year, the BIPT, as the DSC, received ten complaints which were retained as complaints for alleged infringement of the DSA<sup>3</sup>. Additionally, the Belgian DSC received 28 other complaints, in

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<sup>3</sup> The BIPT received multiple reports which, however, for various reasons, were not considered complaints for alleged infringement of the DSA.

which the complainants made reference to the DSA. However, these complaints were either not related to the DSA or lacked sufficient supporting evidence. It is important to note that each complaint received (38 in total in 2024) requires a thorough analysis of its admissibility. This process takes time, and exchanges with complainants were sometimes necessary to complete their complaints and clarify what needs to be included, so that they can be handled properly. Some exchanges, however, were unsuccessful due to the lack of response from the complainant and could not be recorded as valid complaints, which is why they have not been counted in this activity report.

Among the ten admissible complaints registered, three were lodged by users of intermediary services located in another Member State against providers of intermediary services either established in Belgium or represented by a designated legal representative in Belgium. In accordance with Article 53 of the DSA, the complainants lodged their complaint with the DSC of their respective country of location. These complaints were subsequently transmitted to the Belgian DSC via AGORA<sup>4</sup>, the information-sharing system established by the European Commission under Article 85 of the DSA.

One of the complaints handled by the BIPT as a competent authority concerned the publication on a public channel of lists containing sensitive personal information about several students on an online platform, without their consent. The published information included an assessment of their sexual performance. The complainants had reported the content to the online platform, and requested its removal. However, as the platform failed to provide the complainants with a detailed explanation as to why the content had not been deleted, the complainants escalated the matter to the prospective Dutch DSC, ACM, which subsequently transferred the complaint to the BIPT. Throughout the process, ACM acted as a contact point between the BIPT and the complainants, facilitating the exchange of information.

The BIPT engaged with the platform multiple times to assess how it had handled the notifications from the complainants. As a result, the reported content has been removed from the referenced channels.

The remaining seven complaints were submitted by Belgian users of intermediary services, against providers either based in another Member State or represented by a designated legal representative in that country. Using the AGORA information-sharing system, the BIPT forwarded these complaints to the DSC of the provider's country of establishment, in accordance with Article 53 of the DSA. These complaints were submitted to the BIPT through a specifically designed complaint form, allowing complainants to explain their problems or observations in a written format. Additionally, the form enables them to select one or more predefined scenarios that reflect their situation and the potential DSA infringement by the provider. From an operational perspective, the structured format ensures that the complaint handling team disposes of all required information, including privacy authorisations for sharing the complaint with both the provider and with the DSC of the provider's country of establishment.

In accordance with the aforementioned cooperation agreement, the BIPT shared the complaints with the Belgian competent authorities. As stated before, the BIPT is developing a dedicated information-sharing system to facilitate and streamline the exchange of information, including complaints.

While the total number of complaints handled remains limited for 2024, the BIPT anticipates a strong increase in the number of complaints in the coming years. A new dynamic should increase the number of cases following the entry into force on 9 January 2025 of the Act approving the cooperation agreement between all the competent authorities as well as the official designation of the BIPT as DSC. In addition, the public's growing awareness of this new protection is a factor that will lead to an increase in the workload regarding the handling of complaints.

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<sup>4</sup> AGORA is the information-sharing system established by the Commission aiming to support communications between Digital Service Coordinators, the Commission, and the Board. Other competent authorities may be granted access to this system where necessary for them to carry out the tasks conferred to them in accordance with this Regulation. For more information, see Article 85 of the [DSA](#) and the [Commission implementing regulation \(EU\) 2024/607 of 15 February 2024 on the practical and operational arrangements for the functioning of the information-sharing system pursuant to the DSA](#).

### 2.2.1. Categorisation of the complaints

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

<b>Authority</b>	<b>Number of complaints received</b>
BIPT – DSC	28 inadmissible complaints
BIPT – competent authority	3 complaints handled
CSA – competent authority	N.A.
Medienrat – competent authority	N.A.
VRM – competent authority	N.A.

In 2024, the BIPT received and handled a total of three complaints against providers of intermediary services established in Belgium or with a legal representative in Belgium (see Annex 1 for more details regarding these complaints).

However, complaints not related to the DSA were lodged, for instance against websites or applications that do not qualify as providers of intermediary services. This includes gaming apps and news websites, some of which offer a purely ancillary messaging or commenting feature. As these services do not fall within the scope of the DSA, complaints against them cannot be considered complaints for alleged infringement of the DSA. For instance, the Medienrat, as a competent authority, received a complaint referring to the DSA against a news website. The complaint was subsequently forwarded to the BIPT, in its role as DSC, for further analysis. Upon review, the BIPT determined that the website does not provide an intermediary service, as the hosted content is published by authors under the editorial control of that website itself.

Complaints deemed to lack sufficient supporting evidence often failed to provide enough information for the BIPT to assess a potential DSA infringement. In such cases, complainants were systematically requested to submit additional details, such as documentation of previous steps taken by the complainant, screenshots of relevant online content, or records of correspondence with the service provider. If the requested information was provided, the case could be reassessed as a formal complaint. Yet, such requests were often left unanswered, leading to the complaint being disregarded.

For example, the CSA, as a competent authority, received a complaint against a provider of a very large online platform. The complaint was forwarded to the BIPT, as the DSC, for assessment. Upon review, the BIPT noticed that the complainant had not provided any evidence to substantiate the allegations or demonstrate any prior actions taken. Despite follow-up requests from both the BIPT and the CSA for additional information, no response was received, and the complaint could not be processed further.

#### 2.2.1.2. *Categorisation of the total number of transmitted complaints by specific receiving DSC*

<b>Authority</b>	<b>Number of complaints transmitted</b>
CNAM – Ireland	7

In 2024, the BIPT, in its capacity as the Belgian DSC, received and forwarded seven complaints to other European DSCs, all of which were transmitted to the Irish DSC. These included four complaints (three against Facebook and one against Instagram) relating to the blocking of accounts without adequate justification nor effective remedies (art. 17 DSA), one complaint against Facebook for the demonetisation of a business account on Facebook, without adequate justification nor effective remedy

(art. 17 DSA), one complaint against Google Play for blocking a developer account without adequate justification (art. 17 DSA) and one complaint against Temu regarding various breaches of the DSA, including the lack of transparency concerning the recommendation system (art. 27 DSA) and traceability of professionals active on the platform.

### **2.2.2. Complaints that led to formal investigations in 2024**

A formal investigation is considered to have been opened when formal investigation powers according to national law of the DSA have been used by the DSC and/or another competent authority.

In 2024, no formal investigations were initiated by the BIPT, the CSA, the Medienrat, and the VRM.

## **3. Orders (Articles 9 and 10 of the 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 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 national authorities.

The issuing authority, or another specified authority if this is stated in the order, must share the order and any information about its implementation 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 obligated to promptly inform the relevant national judicial or administrative authority, or any other authority specified in the order, 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 conditions for the orders issued by national authorities. The issuing authority, or another specified authority if this is stated in the order, must also share the order and any information about its implementation with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

### **3.2. Orders received**

As explained earlier, the BIPT was not officially designated as the Belgian DSC until early 2025. However, the BIPT proactively assumed a role in implementing this European regulation without waiting for its official designation as DSC. 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.

In 2024, the BIPT received one order pursuant to Article 9, and none pursuant to Article 10 of the DSA. Nevertheless, we cannot ignore the number of communications that should have been made by the authorities concerned to the BIPT but were not made as required by Articles 9 and 10 of the DSA due to a lack of awareness of the obligations or late compliance. It is therefore reasonable to expect a significant increase in the number of orders received as these authorities gradually bring themselves into line with these obligations.

Over the past year, the BIPT organised numerous interactions with national administrative and judicial authorities empowered to issue orders. These exchanges took various forms, including meetings, presentations and participation in study days. Despite these sustained efforts, it should be noted that to date, the BIPT has not received any orders from national authorities.

Regarding Telegram, according to our information, it seems that a significantly higher number of official requests were addressed directly to the platform by the judicial and law enforcement authorities of the EU. Given the diversity of these requests, some may fall under the DSA, while others may relate to different issues, such as terrorism or other topics. This number of notices made directly to the platform without communication to the Belgian DSC represents a potentially significant increase, which could prove massive, in the number of orders if they were systematically transmitted to the DSC.

However, this does not mean the relevant national administrative and/or judicial authorities are not willing to provide any orders. From the many exchanges, it appears that the lack of a transparent and harmonised methodology or automated sharing system, might be the most important reason for not forwarding the orders, not seeing the clear added value of the forwarding (as to how this would have a more positive impact on their investigation or prosecution), in addition to the supplementary administrative burden of forwarding orders to another authority.

In anticipation of a more harmonised and efficient methodology and automated sharing system, the BIPT already had exchanges with a few authorities in order to draft a standard order document, a standard monitoring sheet for the forwarding of the orders and follow-up of actions, as well as to explore the different potential sharing instruments.

Within the framework of the European DSA Board working groups (for more details regarding working groups, see section 7), the BIPT actively participated in discussions on the modalities for receiving orders. There again, the BIPT raised crucial questions regarding the practical management of a potentially large volume of orders. The BIPT highlighted the current technical challenges related to the efficient receiving and processing of such a volume of orders.

Furthermore, the BIPT regularly solicited its European counterparts during these working groups and other meetings, inviting them to share any orders they might have received. In 2024, the BIPT received only one order (Article 9) from another European country.

### **3.3. Effects given to the orders**

The BIPT received an order from the Estonian DSC to take action against Telegram due to a violation of Council Regulation No 833/2014 of 31 July 2014, as banned Russian channels were broadcast on the platform. As Telegram did not initially respond, the BIPT contacted the online platform, which subsequently removed the channels involved. Following this incident, the BIPT reminded Telegram of its obligations under the DSA.

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

### **4.1. Introduction**

Under the DSA, out-of-court dispute settlement bodies offer an additional opportunity for users to have content moderation disputes with online platforms resolved. Online platforms must inform users of this option for resolving problems and are also required to cooperate with the procedures of certified dispute settlement bodies. Upon request, DSCs certify dispute settlement bodies located in their Member State if they meet the statutory requirements set out in Article 21 of the DSA. For example, the dispute settlement bodies must be independent. In addition, they must have sufficient expertise, for example, in a certain type of illegal content. Dispute settlement bodies must handle disputes in at least one official EU language.

## **4.2. Certification of out-of-court dispute settlement (ODS) bodies in 2024**

In 2024, the BIPT did not certify any ODS body. Neither was the BIPT approached to discuss or initiate such a certification process.

## **5. Trusted flaggers (Article 22 of the DSA)**

### **5.1. Introduction**

Under the DSA, trusted flaggers are responsible for detecting potentially illegal content and alerting online platforms. They are experts at detecting certain types of illegal content online, such as hate speech or terrorist content, and they notify it to the online platforms. The notices submitted by them must be treated with priority by online platforms as they are expected to be more accurate than notices submitted by an average user. The trusted flagger status is awarded by the DSC of the Member State where the applicant entity is established. DSCs oversee the application process, ensuring entities meet the criteria laid down in Article 22 of the DSA, such as independence from any online platform or specific expertise. Pursuant to Article 22(8) of the DSA, the Commission, after consulting the Board, must where necessary, issue guidelines to assist providers of online platforms and Digital Services Coordinators in applying these criteria. The guidelines are scheduled to be adopted in Q2 2025.

### **5.2. Certification of trusted flaggers in 2024**

As previously mentioned, the BIPT was not designated as DSC officially until early January 2025 and is now officially mandated to receive the applications. Within the Belgian context, the BIPT, as the DSC, receives all trusted flagger's applications, then subjects them to a competence analysis according to the Belgian Constitution and subsequently designates the competent authority for further processing of the application.

Awaiting its official designation as the DSC, the BIPT had several introductory or exploratory meetings with potential candidates and still remains available for questions from anyone interested in becoming a trusted flagger.

When requested, the BIPT, as the DSC, also made presentations on the topic of trusted flaggers, for both potential candidates and organisations or local authorities that might need to rely on trusted flaggers.

Since September 2024, within the context of the Board's working groups on the matter, the competent authorities have actively participated in the elaboration of the guidelines, by providing general concerns and specific questions or example situations that might occur within the context of endorsing a candidate, by providing input on the structure and topics to be covered by the guidelines.

In view of the above, no formal applications were submitted to the BIPT in 2024.

## **6. Vetted researchers (Article 40 of the DSA)**

### **6.1. Introduction**

Vetted researchers are researchers that have the right to access non-public data for their research on systemic risks or measures to mitigate them at the Very Large Online Platforms and Search Engines. Systemic risks are risks that can inflict serious harm to society or the economy at large, for example the widespread dissemination of illegal content or election interference. In order to gain access to relevant

data, the DSC of the Member State of establishment of the specific Very Large Online Platform or Search Engine can grant the status to a researcher when the researcher has demonstrated that he meets the conditions laid down in Article 40 of the DSA. Very Large Online Platforms and Search Engines are required to give researchers access to that data to the researchers who have been granted the status of vetted researcher.

## **6.2. Status granted to vetted researchers in 2024**

Pending the adoption/entry into force of the Delegated Act provided for in Article 40(13) of the DSA and the adoption of a Memorandum of Understanding among DSCs, the BIPT has not yet granted the status of vetted researcher to anyone.

In any case, as the BIPT is currently not the DSC of establishment of any Very Large Online Platform (VLOP) or Very Large Online Search Engine (VLOSE), it can only conduct an initial assessment as mentioned in Article 40(9) when receiving an application of researchers affiliated to a research organisation established in Belgium. This initial assessment is limited to checking whether the candidate researchers meet all of the conditions set out in Article 40(8).

In the course of 2024, the BIPT reached out to several academic institutions in Belgium to discuss the implementation of Article 40 of the DSA. These were informal meetings of a more general nature and did not concern specific requests for access.

The BIPT has participated in a pilot project organised by the European Commission with other DSCs and academic researchers with the aim of streamlining the application template and identifying potential challenges regarding the evaluation of the applications.

## **7. Enforcement and (inter)national activities**

### **7.1. Introduction**

In 2024, 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 2024**

As stipulated in Article 5 of the cooperation agreement of 3 May 2024, between the BIPT, as the DSC, and the competent authorities, an information exchange system was planned to share information. Since the BIPT was not appointed officially as the DSC until 30 December 2024, the system was not yet put into use with the competent authorities in 2024.

In parallel with international efforts to be prepared, together with the European Commission and other DSCs, to handle incidents impacting the integrity of electoral processes (see below), the BIPT established contacts with the entity within the FPS Home Affairs responsible for organising the European and national elections of June 2024, as well as with representatives of the working group within the National Crisis Center that detects, analyses, and coordinates activities to counter potential threats to electoral processes in Belgium.

Additionally, the BIPT had several ad hoc contacts with representatives of VLOPSEs, including Google and X, in the run-up to the national and European elections of June 2024. The BIPT did not receive any complaints regarding inappropriate responses by VLOPSEs to actual or foreseeable threats to the integrity of electoral processes in 2024,.

## 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 2024, the European Board for Digital Services held a total of 12 meetings.<sup>5</sup> 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 attended all 12 Board meetings as an observer, together with one of the competent authorities.

It also participated in the 'tabletop exercise on elections' on 24 April 2024. This exercise, organised by DG CNECT of the European Commission, brought together representatives from VLOPSEs, DSCs, fact checkers and civil society representatives to practise actions aimed at preventing or mitigating events that could negatively impact the proper conduct of elections.

In addition the BIPT, the CSA, the Medienrat, and the VRM experts have participated in a number of Working Groups that have been established under the Board.<sup>6</sup>

The BIPT participated in two ad hoc meetings (out of the twelve Board meetings held) of the European Board for Digital Services – one on X<sup>7</sup> and the other, on elections in Romania<sup>8</sup>:

- On 9 August, the Board met virtually to discuss the European Commission's preliminary view that X is in breach of the DSA<sup>9</sup>. Subjects such as deceptive and manipulative designs (Article 25 of the DSA), ad repository (Article 39 of the DSA), and data access for researchers (Article 40(12) of the DSA) were raised.

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<sup>5</sup> <https://digital-strategy.ec.europa.eu/en/policies/dsa-board - European Board for Digital Services>

<sup>6</sup> <https://digital-strategy.ec.europa.eu/en/policies/dsa-board-working-groups>

<sup>7</sup> The Board gathered Member's views on the preliminary findings issued against X, in line with Article 66(4) of Regulation (EU) 2022/2065 ('DSA'). The Commission opened formal proceedings against X on 18 December 2023 in the areas of risk management, content moderation, dark patterns, advertising transparency and data access for researchers.

<sup>8</sup> As safeguarding free elections in the EU is a key objective of the Commission, the Commission has taken initiatives in the framework of the DSA once it had learned about the potential disruption of Romanian elections through a possible coordinated campaign on TikTok.

<sup>9</sup> [Commission sends preliminary findings to X for breach of DSA](#)

- On 6 December, the Board met virtually to discuss the Romanian presidential elections in light of documents declassified by the Romanian Supreme Council of National Defence just days prior<sup>10</sup>. Subjects such as a possible coordinated campaign on TikTok and the possible targeting of Romanian diaspora in the EU were raised.

### **7.3.2. The Working Groups**

The Board established eight Working Groups ('WGs'). These WGs assist and report to the Board. Each WG was assigned an area of topics relating to the DSA for which it will contribute to the work of the Board, in particular in examining relevant specific questions and preparing documents for the Board as provided for in the Board's Work Plan and the WGs' respective initial tasks as approved by the Board.

The members of the WGs are the members of the DSCs.

The European Commission chairs each WG through a representative at the technical level. Each WG elected one member of DSC as Vice-Chair for a period of 1 year, which is renewable. The Vice-Chair assists the Chair of the WG and both collaborate trustfully in full respect of their respective roles.

In addition to the Board's Work Plan and the WG's initial tasks, the Board may request specific deliverables from a WG and in that respect, grants the WG a mandate to initiate work. Any member of the WG may also suggest to the Chair that a mandate be requested for additional WG deliverables.

The WG meetings are held online as virtual meetings. In-person meetings should be scheduled only where strictly necessary, and not more than once per year except in exceptional and justified cases.

The frequency of meetings are established by the WG's Chair based on the tasks assigned to the WG and their prioritisation, in close coordination with the Board's Secretariat and in consultation with the WG's Vice-Chair. Each WG meets at least four times per year.

Other competent authorities of a Member State that have been entrusted by national law with specific operational responsibilities for the application and enforcement of the DSA may be invited by the Chair of the WG, upon request of the respective DSC, to attend specific agenda items in specific meetings of the WG.

Other national authorities may also be invited to specific agenda items in specific meetings of the WG by the Chair of the WG upon request of the respective DSC, where the issues discussed are directly related to their competence and tasks and where their specific expertise is essential for the discussions.

As mentioned above, in Belgium, each WG includes participants from the BIPT (as the DSC and competent authority), with limited places available. Based on the topics addressed, competent authorities (the CSA, the Medienrat, or the VRM) can express their interest in participating to the DSC.

#### ***7.3.2.1. WG 1 – Horizontal and legal issues***

In this WG the scope and the different definitions of the DSA are discussed. DSCs have the opportunity to raise certain issues after which they are discussed with the other DSCs and the Commission.

There have already been three meetings of this working group, which mainly dealt with the definition of webshops, the place of main establishment, the relation between the mother company and the different services that are offered in different member states, the definition of ancillary services (comments in media?), the implications of hybrid services, etc.

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<sup>10</sup> [Press release by the Romanian President](#)

**7.3.2.2. WG 2 – Working Together**

The objective of this WG is to discuss and improve processes where DSCs need to work with each other or wish to have an aligned working method. During the four meetings of 2024, four main subjects were brought up: common standards for efficient information sharing through AGORA, the information-sharing system pursuant to Article 85 of the DSA, preparing the Board’s annual report on systemic risks, ensuring coherence and comparability of the DSCs’ annual activity reports, and enhancing the effectiveness of complaint handling by aligning procedures and streamlining communication.

These efforts resulted in a clear common approach for drawing up the annual activity report and in enhanced communication through AGORA, including for complaint handling.

**7.3.2.3. WG 3 – Content moderation and data access**

Among other subjects, this WG focuses on trusted flaggers, out-of-court dispute settlement, transparency reporting of providers of online platforms and data access for vetted researchers.

WG 3 met six times in 2024. During these meetings, the members discussed among other topics the upcoming European Commission guidelines on trusted flaggers, the Delegated Act on data access and the Implementing Act on transparency reporting.

**7.3.2.4. WG 4 – Integrity of the information space**

Among other subjects, this WG deals with the assessment of systemic risks for national, regional elections and monitors VLOPSEs’ actions and implementation of the Commission guidelines on the mitigation of systemic risks for electoral processes, applicable to such online platforms and search engines. In this context the Board Working Group exchanged experiences about various elections and provided input in a post-election assessment of the June 2024 EU Parliament elections.

The WG is also entrusted with the task of building expertise and knowledge on the assessment and mitigation of mis- and disinformation. In that regard, this Working Group followed the developments of the conversion of the 2022 ‘Code of Practice on Disinformation’ into a Code of Conduct subject to article 45 of the DSA.

**7.3.2.5. WG 5 – Consumers and online marketplaces**

This WG focuses on online marketplaces, on the interplay between the DSA and Consumer Protection, as well as on the cooperation with consumer protection authorities.

The members of the WG met on three occasions in 2024.

During these meetings, the participants discussed among other topics, the enforcement actions of the European Commission concerning some of the designated online marketplaces, the cooperation between the CPC Network and WG 5, as well as the legal delimitation between the DSA and the consumer protection acquis.

Within the scope of this WG, the BIPT answered a questionnaire of the European Commission, aiming to gather information on online marketplaces. The answers provided by the BIPT were based on the input received from several national sectoral authorities who are active towards online marketplaces.

**7.3.2.6. WG 6 – Protection of Minors**

This WG focuses on the development and drafting of guidelines under Article 28(4) of the DSA to assist online platforms in ensuring the high level of privacy, safety and security for minors as required under Article 28(1). It also incorporates the previously existing Task Force on Age Verification, which aims to

provide technical input for a short-term solution (app) on 18+ age verification.

The members of the WG met on four occasions in 2024.

Within the scope of this WG, the BIPT was invited to and participated in knowledge-building events such as the Stakeholder workshop on DSA guidelines on the protection of minors of 4 October 2024, and the Safer Internet Forum of 21 November 2024.

The BIPT also collected Belgium's input to the 'Discussion paper for DSCs on Article 28 guidelines' as shared with the Commission in June 2024.

#### ***7.3.2.7. [WG 7 – Orders and criminal issues](#)***

This WG focuses on several key topics regarding orders and criminal issues and held four meetings, preceded by an ad hoc meeting specifically focused on the code of conduct on hate speech.

In these meetings, discussions covered mapping of Articles 9 and 10, establishing an efficient process for sharing orders, and analysing Article 18 through a questionnaire. Particular attention was given to tackling illegal content, especially in the context of Article 45 concerning the code of conduct on countering illegal hate speech. This work progressed through multiple stages, starting with an initial ad hoc meeting, followed by the drafting of a Board opinion and a dedicated session on how Member States address hate speech in terms of both combatting and prevention.

#### ***7.3.2.8. [WG 8 – IT issues](#)***

This WG focuses on AGORA functionalities and future ICT developments.

Two meetings took place: the first was to review and discuss AGORA usage, and the second, a joint session with WG 3, covered the ongoing work on the Article 40 Data Access Portal and on AGORA.

Participating in these meetings could provide valuable information and insights to support the development of the national platform-sharing system, aimed to facilitate collaboration between the DSC (the BIPT) and the competent authorities (the BIPT, the CSA, the Medienrat, and the VRM).

### **7.3.3. European Regulators Group for Audiovisual Media Services (ERGA)**

The European Commission services responsible for enforcing the DSA and the ERGA had agreed on 4 June 2024 to structure their ongoing collaboration to assist the Commission in its supervisory and enforcement activities under the DSA<sup>11</sup>.

The focus of this cooperation was on the supervision of designated VLOPSEs. ERGA, composed by national media regulators under the Audiovisual Media Services Directive (the CSA, the Medienrat, and the VRM included), provides valuable expertise to the Commission in regulating VLOPSEs and supports the Board in achieving the DSA's objectives.

In this context, and based on the CSA's report (see annex 2) and the VRM's report (see annex 4), ERGA organised working groups that included CSA and VRM experts, where several topics were addressed:

- Analysis of the interaction between the DSA and the Audiovisual Media Services Directive,
- Combatting disinformation and strengthening democracy in the digital sector,
- Exchanges with online platforms,
- Fact-checking in the context of the fight against disinformation,

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<sup>11</sup> [Commission services and ERGA partner in support of Digital Services Act enforcement | Shaping Europe's digital future](#)

- Code of practices on disinformation,
- etc.

## 8. Conclusion

Since the DSA came into effect on 17 February 2024, the BIPT, the CSA, the Medienrat, and the VRM have worked closely together to enforce the legislation in Belgium, in anticipation of their official designation – the BIPT as the national DSC, and the BIPT, the CSA, the Medienrat, and the VRM as the competent authorities.

As a first step, a cooperation agreement was signed on 3 May 2024 between the federal government and the Communities to coordinate the implementation of the DSA. This agreement came into force on 9 January 2025, officially designating the BIPT as the national DSC and the BIPT, the CSA, the Medienrat, and the VRM as the four competent authorities, while also defining their respective roles and responsibilities.

From 17 February 2024 onward, these authorities have carried out preparatory work, processed complaints, and actively participated in both national and international activities. Although the number of complaints and orders processed was limited, the implementation of the DSA already played an important role in mitigating the harm reported in the context of these complaints and orders received by the BIPT. Moreover, each complaint received required a thorough analysis of its admissibility, which involved a significant processing time, as well as exchanges with the complainants to clarify the elements necessary for the completeness of their complaint. This experience enabled the BIPT to refine its processes and improve its practices regarding the handling of complaints, thus strengthening its efficiency in handling future cases.

Looking ahead, close collaboration will continue with the competent authorities, the European Commission and DSCs from all Member States. Through ongoing vigilance, close cooperation, and adaptability to emerging challenges in the digital sector, these efforts will play a crucial role in ensuring the effective implementation of the DSA in Belgium, fostering a safer and more transparent online environment.

For 2025, a strong growth in the number of procedures is expected: the increasing compliance by the platforms, the clarifications that will be provided by the European Commission and the European Board on certain points of implementation, the gradual intensification of cooperation with the DSCs and the national administrative or judicial authorities, the significant increase in the number of orders received, the cooperation with trusted flaggers, and the public's growing awareness of this new protection are all factors that will create momentum and a substantial workload.

# **Annexes**

## **Annual Activity Report on the DSA of the four competent Authorities**



# **Annex 1 – BIPT's Annual Activity Report on the DSA for 2024 as a competent authority**

## Annex 1 – BIPT's Annual Activity Report on the DSA for 2024 as a competent authority

### 1. About the BIPT

The Belgian Institute for Postal Services and Telecommunications (BIPT) was established in 1991 as a semi-governmental body and acquired a statute of its own under the law 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 missions:

- promoting healthy competition and ensuring access to the market;
- contributing to the development of a domestic market of efficient networks and well functioning services;
- protecting the users' interests while taking account of 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 high-capacity networks and access to them.

As announced in the 2023 BIPT annual activity report: "the designation of the BIPT as the DSC (Digital Services Coordinator) under the European Digital Services Act (DSA) is ongoing."

Since 17 February 2024 (entry into force of the DSA), the BIPT has been acting as Belgium's prospective DSC and, since 9 January 2025 (entry into force of the cooperation agreement), as the official DSC. Since the entry into force of the DSA, the BIPT is actively involved in coordinating, at national level, the monitoring of compliance with this regulation by the various competent authorities.

This annual activity report exclusively concerns the tasks executed by the BIPT as a competent authority. It does not cover the missions carried out as the Belgian DSC<sup>12</sup>. Regarding these missions, we invite you to read the aggregated annual activity report regrouping the input of the DSC (i.e. the BIPT) and of the four competent authorities (i.e. the BIPT, the CSA, the Medienrat and the VRM).

### 2. Complaints (Article 53 DSA)

In 2024, the BIPT handled three complaints.

One of these complaints concerned the publication of lists containing sensitive personal information about several students on an online platform, without their consent. The complainants had reported the content to the online platform, and requested its removal. However, as the platform failed to provide

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<sup>12</sup> For more information on the tasks assigned to the Belgian DSC, see article 4, §2, of the [law of December 20, 2024 approving the cooperation agreement of May 3, 2024 between the Federal State, the Flemish Community, the French Community and the German-speaking Community on the partial coordinated implementation of the DSA](#).

the complainants with a detailed explanation as to why the content had not been deleted, the complainants escalated the matter to the prospective Dutch DSC, ACM, which subsequently transferred the complaint to the BIPT. Throughout the process, ACM acted as a contact point between the BIPT and the complainants, facilitating the exchange of information.

The BIPT engaged with the platform multiple times to assess how it had handled the notifications from the complainants. As a result, the reported content was removed from the referenced channels.

The other two complaints were submitted by intellectual property right holders whose content was being shared on an online platform without their consent. Despite notifying the platform, the complainants did not receive a satisfactory response, and the content remained accessible. Following intervention by the BIPT, the platform ultimately removed the infringing material.

### **3. Orders (Articles 9 and 10 of the DSA)**

Not applicable. For this matter, the BIPT acted as the Belgian DSC and not as the competent authority. Regarding tasks related to the DSC, we invite you to consult the aggregated annual report.

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

In 2024, the BIPT did not receive any applications for certification as an out-of-court dispute resolution body.

### **5. Trusted flaggers (Article 22 of the DSA)**

In 2024, there was not an officially designated DSC for Belgium yet, since the Cooperation agreement granting the competence of DSC (more particularly to the BIPT) had not been yet voted by all parliaments. According to the Cooperation agreement, all applications are sent to the DSC, which then determines the competent authority for awarding the status of trusted flagger. Therefore, the competent authorities (the BIPT included) could not yet formally receive applications from trusted flaggers candidates and already award the status.

Nevertheless, since September 2024, within the working groups of the European Board for Digital Services, the competent authorities, including the BIPT, have actively contributed to the development of the guidelines, through general concerns, specific questions, and example situations related to endorsing a candidate, as well as input on the structure and key topics to be covered.

### **6. Vetted researchers (Article 40 of the DSA)**

The adoption and entry into force of the Delegated Act provided for in Article 40 (13) of the DSA, as well as the adoption of a Memorandum of Understanding among DSCs, were prerequisites for taking action on this matter. The BIPT did not receive any applications for certification as a vetted researcher.

## **7. Enforcement and (inter)national activities**

For the matter of national and international activities (e.g., European Board for Digital Services and Working groups), the BIPT acted as the Belgian DSC and not as the competent authority. Regarding tasks related to the DSC, we invite you to consult the aggregated annual report.



# **Annex 2 – CSA’s Annual Activity Report on the DSA for 2024 as a competent authority**

## **Annexe 2 – CSA's Annual Activity Report on the DSA for 2024 as a competent authority**

### **1. Introduction**

Dans un Etat fédéral, la mise en œuvre du Règlement sur les services numériques (ci-après, « règlement » ou « DSA ») est bien sûr une tâche relativement complexe étant donné la nature du règlement : un instrument juridique transversal qui doit s'appliquer à côté/en plus des législations sectorielles.

Le Conseil supérieur de l'Audiovisuel (ci-après, « CSA ») est une « autorité de régulation nationale » au sens de l'Article 30 de la directive européenne sur les services de médias audiovisuels (ci-après, « Directive SMA »), mais est également l'une des autorités de régulation nationales en Belgique, au sens du DSA.

Le CSA entend assumer pleinement ses responsabilités nouvelles et coopérer loyalement à l'application du règlement en Belgique.

En effet, notre espace médiatique a besoin de régulation pour protéger ses utilisateurs, notamment les plus fragiles, les enfants, et les entreprises ont besoin d'un cadre réglementaire clair qui permette une concurrence équilibrée face aux grandes plateformes internationales.

En tant qu'une des quatre autorités compétentes pour le DSA en Belgique, le CSA est en principe compétent pour tous les aspects du règlement, notamment dans la mesure où il s'agit de « services d'intermédiation liés aux activités de radiodiffusion » et où le prestataire est établi dans la région de langue française ou dans la région bilingue de Bruxelles-Capitale, dans ce dernier cas à condition que le service s'adresse exclusivement à la Communauté française.

La coopération avec les autres autorités compétentes pour le DSA en Belgique et le coordinateur pour les services numériques belge (ci-après, « DSC belge » ou « IBPT ») est réglementée dans l'accord de coopération du 3 mai 2024. Celui-ci comprend des procédures de consultation et d'échange d'informations, notamment en ce qui concerne le traitement des plaintes, la certification des organismes de résolution extrajudiciaire des litiges, l'octroi du statut de « trusted flagger », l'octroi du statut de chercheur agréé et la participation aux réunions du Conseil européen des services numériques (ci-après, « Board »).

Dans le cadre de ses missions, le CSA dispose de pouvoirs d'enquête et de la capacité d'imposer des sanctions, telles que des amendes administratives. Les décisions sont prises par le Collège d'Autorisation et de Contrôle.

### **2. Plaintes (art.53 DSA)**

Durant l'exercice 2024, le CSA a reçu une plainte concernant Wikipédia (retrait de publication) pour laquelle il a invité le plaignant à contacter l'IBPT, ce qu'il n'a pas fait. Le CSA a pris contact avec l'IBPT qui, au vu des éléments de ce dossier, considère que la plainte n'est de toute façon pas assez étayée (manque de preuve).

### **3. Injonctions (art. 9 et 10 DSA)**

Sans objet durant l'exercice concerné.

### **4. Organes de règlement extrajudiciaire des litiges (art. 21 DSA)**

Sans objet durant l'exercice concerné.

### **5. Signaleurs de confiance (art.22 DSA)**

Sans objet durant l'exercice concerné.

Le CSA souligne néanmoins que le sujet a fait l'objet de questions et discussions avec le public et des acteurs de la société civile.

### **6. Chercheurs agréés (art.40 DSA)**

Sans objet durant l'exercice concerné.

## **7. Autres**

### **7.1. Activités nationales**

Le CSA collabore étroitement avec le DSC belge ainsi que les autres autorités compétentes belges (Vlaamse Regulator voor de Media et Medienrat) pour coordonner l'application du DSA en Belgique. Ainsi en 2024, le CSA a participé à un certain nombre de réunions afin de veiller à la bonne implémentation dudit règlement au niveau national ainsi qu'à de nombreuses réunions de préparation pour la participation au Board, organe présidé par la Commission européenne.

Dans le cadre des élections fédérales, européennes et régionales, le CSA et le DSC belge ont pris l'initiative d'organiser plusieurs rencontres avec les très grandes plateformes en ligne. Ces réunions visaient à favoriser l'échange d'informations, notamment sur les mesures permettant de réduire les risques de manipulation de l'information et d'ingérence étrangère.

Par ailleurs, le CSA a mené des consultations avec les différentes parties prenantes concernant trois aspects principaux : la mise en œuvre du DSA en Communauté française, le règlement extrajudiciaire des litiges, et le mécanisme de signaleurs de confiance.

### **7.2. Activités internationales**

#### **7.2.1. Activités au sein du Board**

En 2024, le CSA a participé aux réunions du Board aux côtés du DSC belge, conformément au système de rotation entre les autorités compétentes. Le CSA a contribué au travail de deux groupes de travail (ci-après, GT) : le GT4 consacré à l'intégrité de l'espace d'information et le GT6 relatif à la protection

des mineurs. Dans ce contexte, il a participé à plusieurs réunions et workshop.

- GT4 « l'intégrité de l'espace d'information » :

Les activités principales de ce GT ont consisté en 1°) la participation au processus de monitoring, d'implémentation et de transition du Code renforcé de bonnes pratiques de lutte contre la désinformation (CoP) en Code de Conduite (CoC) sous l'égide de l'art.45 du DSA ; 2°) l'échange de bonnes pratiques entre les différents régulateurs pour lutter contre la désinformation en période électorale et mise en place d'un toolkit ; 3°) l'organisation de différents workshops avec les parties prenantes de la lutte contre la désinformation ; 4°) la coopération avec les autres GT et les Groupes d'action autour des questions liées à l'articulation entre les différentes législations et aux liens entre la lutte contre la désinformation et l'éducation aux médias.

- GT6 « Protection des mineurs en ligne » :

Le CSA a participé à plusieurs réunions organisées au sein du GT6 concernant l'application du DSA concernant la protection des mineurs, le projet de lignes directrices de la Commission européenne destinées à aider les fournisseurs à appliquer l'Article 28, § 1er, DSA, ainsi que la nouvelle plateforme BIK. Il a également participé, antérieurement à la constitution des GT, aux travaux de la *Task Force* sur les systèmes de vérification d'âge.

### **7.2.2. Activités du Groupe des régulateurs européens des services de médias audiovisuels (ERGA)**

Le 4 juin 2024, les services de la Commission européenne chargés de l'application du DSA et l'ERGA se sont associés pour soutenir l'application du DSA<sup>[1]</sup>. Dans ce cadre, le CSA a été sollicité comme expert par la Commission, y compris concernant les résultats de son étude sur les contenus pornographiques sur X et la méthodologie utilisée.

Le CSA, en sa qualité d'autorité de régulation nationale désignée conformément aux dispositions de la Directive SMA, a participé au GT4 de l'ERGA, au sein duquel l'interaction du DSA et la Directive SMA a été examinée. Les experts du CSA ont également participé au GT3 de l'ERGA (relatif à la lutte contre la désinformation et le renforcement de la démocratie dans le secteur numérique) ainsi qu'aux échanges avec les plateformes en ligne et les vérificateurs de fait dans le contexte de lutte contre la désinformation et le Code de bonnes pratiques sur la désinformation.

Dans le cadre du GT3 de l'ERGA, les principales activités ont été les suivantes : 1°) Mise en œuvre du Code de bonnes pratiques renforcé sur la désinformation et de son processus de conversion sous l'égide de l'art.45 du DSA ; 2°) Monitoring du Code de bonnes pratiques sur la désinformation ; 3°) Mise en œuvre du Règlement sur la transparence et le ciblage de la publicité à caractère politique ; 4°) Suivi (questionnaires) de l'évolution des compétences des autorités nationales de régulation en matière de lutte contre la désinformation ; 5°) Organisation de divers workshop avec le secteur de la lutte contre la désinformation ; 6°) Création, en lien avec le groupe en charge de l'éducation aux médias, d'une campagne de prévention face à la désinformation diffusée lors de la période préélectorale européenne

Le champ d'action du GT4 de l'ERGA réside dans l'analyse et l'assurance d'une application harmonieuse du DSA dans le contexte réglementaire et régulateur des médias. Ses travaux se concentrent en particulier sur l'application parallèle du DSA et de la Directive SMA ainsi que sur un premier aperçu des interactions avec les nouvelles procédures prévues dans le cadre de l'EMFA (European Media Freedom Act).

[1] <https://digital-strategy.ec.europa.eu/en/news/commission-services-and-erga-partner-support-digital-services-act-enforcement>



# **Annex 3 – Medienrat's Annual Activity Report on the DSA for 2024 as a competent authority**

## **Annex 3 – Medienrat's Annual Activity Report on the DSA for 2024 as a competent authority**

### **8. About the Medienrat**

The *Medienrat der Deutschsprachigen Gemeinschaft* (Medienrat/ Media Council) is the independent regulatory authority for media services. These include in the Belgian understanding (auditive/sound services, audiovisual services and video-sharing platform services thus intermediary services like hosting services<sup>13</sup>). It is competent for the contents and the "technical aspects" of these "media services". Therefore, the networks and services used for their transmission in the German-speaking community of Belgium<sup>14</sup> fall under the remit of the Media Council. The *Medienrat's* office is in Eupen.

The *Medienrat* was established in 2000 as an advisory body<sup>15</sup>. It became a regulatory authority in 2005<sup>16</sup> and is currently governed by the Decree of 1 March 2021 on media services and cinema screenings. It consists of a decision-making chamber (the *Medienrat* as such) with up to four members (currently, three members are serving) appointed by Government Decree and an Office composed of specialized personnel who assist in preparing the council's decisions<sup>17</sup>. In 2024 the *Medienrat* revised the structure of its Office and hired additional personnel, including a member responsible for European Affairs (esp. EBDS as well as inner-Belgian cooperation in this context and ERGA/EBMS).

As independent national regulatory authority, the Media Council applies the provisions of the Media Decree 2021 to media services such as audiovisual and audio media services and video-sharing-platform services whose providers are based in the German-speaking community of Belgium and ensures that these provisions are complied with. In particular, it monitors the protection of minors, compliance with the rules on the diversity of opinion and on advertising<sup>18</sup>. The *Medienrat* is entitled to impose administrative sanctions in the event of non-compliance with decree<sup>19</sup>.

Additionally, the Media Council collaborates with other Belgian media regulators, 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 regulators, the *Medienrat* forms the Conference of Regulators for Electronic Communications Networks, which cooperates in regulating electronic communications networks (and services), especially regarding market analyses<sup>20</sup>.

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<sup>13</sup> 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'.

<sup>14</sup> Artikel 130 §1 Nr. 1 Belgischen 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 §1, 112 §3 und 138 Dekret vom 1. März 2021 über die Mediendienste und die Kinovorstellungen (Mediendekret 2021 – Media Decree 2021).

<sup>15</sup> Mediendekret vom 26. April 1999.

<sup>16</sup> Dekret vom 27. Juni 2005 über den Rundfunk und die Kinovorstellungen.

<sup>17</sup> Article 101 §2 of the Media Decree.

<sup>18</sup> Art. 11, 12, 13, 14, 17, 27, 28, 32 & 112 Mediendekret 2021; Art. 28 DSA.

<sup>19</sup> Art. 138 & 139 Mediendekret 2021.

<sup>20</sup> Accord de coopération du 17 novembre 2006 entre l'Etat fédéral, la Communauté flamande, la Communauté française et la Communauté germanophone relatif à la consultation mutuelle lors de l'élaboration d'une législation en matière de réseaux de communications électroniques, lors de l'échange d'informations et lors de l'exercice des compétences en matière de réseaux de communications électroniques par les autorités de régulation en charge des télécommunications ou de la radiodiffusion et la télévision (B.S. 28.12.2006).

On the European level, the *Medienrat* is member of ERGA<sup>21</sup>, which will be replaced by the EBMS<sup>22</sup> established by the European Media Freedom Act (EMFA)<sup>23</sup> and of EPRA<sup>24</sup>. Thus, the Media Council works closely with its colleagues of European and national institutions to provide its expertise and assistance in cross-border matters.

The *Medienrat* is the national regulatory authority regarding the Audiovisual Media Services Directive<sup>25</sup> and will be designated in Spring 2025 as competent authority for EMFA<sup>26</sup>. Within the scope of its responsibilities, the Media Council is also the competent authority of the German-speaking Community for the supervision of the Digital Markets Act<sup>27,28</sup>.

Within the framework of the Digital Services Act (DSA) the Media Council is appointed by the Media decree 2021 as competent authority for the German-speaking Community in the sense of article 49 of the DSA<sup>29</sup>, especially for media services which are to be considered as intermediary services. Together with the other Belgian competent authorities (CSA, VRM, BIPT) and the Digital Services Coordinator (DSC) of Belgium (BIPT) the *Medienrat* applies the DSA under its jurisdiction. For this purpose, a cooperation agreement<sup>30</sup> has been signed between the Federal state, the Flemish Community, the French Community and the German-speaking Community. The agreement designates the BIPT as Belgian Digital Services Coordinator<sup>31</sup> and organizes the cooperation between the different authorities, especially concerning complaints<sup>32</sup>.

Even if the Belgian cooperation agreement of 3 May 2024 on the implementation of the DSA only entered into force on 9 January 2025, the agreement has been signed on 3 May 2024. Therefore, it has been applied by the CA (competent authority) since that day.

## 9. Complaints

In February 2024, the *Medienrat* received one complaint, which was transmitted, to the BIPT for handling. The complaint was addressed against a Platform located in the bilingual region of Brussels-Capital for providing "total anti-Ukrainian and anti-European propaganda". Since the qualification of the service was not clear, the *Medienrat* has notified the complaint to the BIPT "to be on the safe side", since it was clear that the Media Council is not responsible for a media service provider located in the bilingual area of Brussels-Capital. At the occasion of an informal meeting of the Belgian competent

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<sup>21</sup> Abbr. "European Regulators Group for Audiovisual Media Services".

<sup>22</sup> Abbr. "European Board for Media Services".

<sup>23</sup> Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act) (Text with EEA relevance) (OJ L, 2024/1083, 17.04.2024).

<sup>24</sup> Abbr. "European Platform of Regulatory Authorities".

<sup>25</sup> Article 30 of the 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).

<sup>26</sup> Art. 112 § 3 Mediendekret 2021 as this will be amended by Art. 126 of the Programme-Decree 2024. The latter is due for adoption by end of February 2025 (PDG, *Dok.* 37 (2024-2025) Nr. 1).

<sup>27</sup> Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act).

<sup>28</sup> Art. 112 Mediendekret 2021.

<sup>29</sup> Dekret zur Billigung des (B.S. 17.06.2024).

<sup>30</sup> Zusammenarbeitsabkommens 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) (Cooperation agreement of 3 May 2024 between the Federal state, the Flemish community, the French community and the German-speaking community for the coordinated partial implementation of Regulation (EU) 2022/2065 of the European Parliament and the Council of 19 October 2022 on the internal market for digital services amending Directive 2000/31/EC (Digital Services Act)). Concerning the German-speaking Community, the Cooperation Agreement has been approved by a Decree of the Parliament of May 8 2024, which has been published in the Belgian Official Journal on June 17, 2024.

<sup>31</sup> Art. 1, 3° and Art. 4 of the Cooperation Agreement of 3 May 2024.

<sup>32</sup> Art. 11 and 5 of the Cooperation Agreement of 3 May 2024.

authorities and the BIPT as presumptive DSC end of March<sup>33</sup>, the platform was not considered as a hosting service.

In June 2024 the Media Council received a – not yet closed - informal enquiry by an institute on political education located in the German-speaking Community. The institute reacted on "defamatory statements on social media". However, it turned out that the incriminated statements were part of comments posted on an online journal beneath articles published by the platform. According to recital 13 of the DSA, "providers of hosting services should not be considered as online platforms where the dissemination to the public is merely a minor and purely ancillary feature that is intrinsically linked to another service, or a minor functionality of the principal service, and that feature or functionality cannot, for objective technical reasons, be used without that other or principal service [...]. For example, the comments section in an online newspaper could constitute such a feature, where it is clear that it is ancillary to the main service represented by the publication of news under the editorial responsibility of the publisher." As the Belgian "rules of procedure" for handling of enquiries and complaints and for the qualification of services were not established yet, the DSC was only informally informed. The case helped the Media Council to establish its internal rules of procedure for addressing complaints in general and more specifically for identifying enquiries to be transmitted to the DSC<sup>34</sup> (see below, pt. 3.1).

In 2024, the *Medienrat* did not transmit any complaints to a foreign DSC, nor did it open any formal investigations.

## 10. Activities

### 10.1. National Activities

In accordance with the cooperation agreement of 3 May 2024 (referenced above), the *Medienrat* is entrusted with enforcing the activities outlined in Article 4, §7, subparagraph 2 of the agreement, respecting the division of competences within the Belgian context.

In terms of activities, the *Medienrat* has participated in a variety of activities on the Belgian level:

The Media Council participated at several coordination and working meetings<sup>35</sup> between the four Belgian Authorities concerned, - organized by the BIPT and starting already February 2024. The aim of these meetings was to prepare the implementation the cooperation agreement, share best practices, and provide information on practical matters, such as handling complaints.

In this context and based on the experience with the handled complaints and the application of article 10 of the cooperation agreement, the DSA together with the other three CAs worked out "internal rules of procedure".

On this basis the *Medienrat* adopted on 28 January 2025 internal rules which apply these rules of procedure and defines when the Media Council operates<sup>36</sup>. This means that complaints which do not fall under the scope of the DSA are not transmitted to the BIPT (as DSC)<sup>37</sup>.

Prior to the European Board for Digital Services (EBDS) meetings and following the "Preparatory Call with the European Commission", a national meeting, titled "Meeting Among Heads," is held between the DSC and the CAs to coordinate the Belgian position during the EBDS. The *Medienrat* attended every "Meeting Among Heads".

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<sup>33</sup> Informal meeting of the 22 March 2024.

<sup>34</sup> Medienrat, Note zum Verfahren zur Festlegung von verwaltungsrechtlichen Sanktionen bei Verletzungen der Bestimmungen des Mediendekrets 2021 und des DSA (Verordnung 2022/2065), 27.01.2025.

<sup>35</sup> The Media Council participated in five coordination meetings called "Meeting Among Heads" to prepare the Belgian position for the board meetings and in seven informal working meetings.

<sup>36</sup> *Idem*.

<sup>37</sup> Art. 11 §1 Cooperation Agreement.

In June 2024, the different CAs and the DSC also published a common press release on the DSA, which explains the DSA, the role of the DSC and the CAs<sup>38</sup>.

## 10.2. European Activities

At the European level, the *Medienrat* participated in one ordinary board meeting virtually with the DSC and other CAs<sup>39</sup>, as well as in the extraordinary board meeting on the Romanian elections, also held virtually<sup>40</sup>. However, the Media Council attended every preparatory call with the European Commission. It should be noted that during in-person EBDS meetings, the DSC is accompanied by one CA, determined by a rotation system among the CAs.

In terms of the working groups, the different CAs participate with the Belgian DSC in the different working groups. The *Medienrat* on his side is member of Working Group 1 - Horizontal and legal issues (WG1) and of Working Group 2 - Working together (WG2). In this respect, the *Medienrat* has participated in all the three meetings of WG1 and in the second, third and fourth meetings of WG2.

At the international level, the *Medienrat* participated in a conference organized by the Hungarian presidency of the Council of the EU<sup>41</sup>. The conference, titled "Protection of Minors vs. Data Protection" focused on challenges related to age verification, the exploration of potential solutions, and manipulative interface designs that influence user behaviour. All these topics were discussed within the regulatory framework of the DSA.

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<sup>38</sup> This press release is available under the following address: [2024-06-03-DSA-Presemitteilung-DE.pdf](#)

<sup>39</sup> 10<sup>th</sup> DSA Board Meeting on the 11 December 2024.

<sup>40</sup> This board took place on the 12 December 2024.

<sup>41</sup> The conference took place the 4 December 2024 at the National University of Public Service in Budapest.

# **Annex 4 – VRM's Annual Activity Report on the DSA for 2024 as a competent authority**

## Bijlage 4 – Jaarlijks Activiteitenverslag van de VRM over de DSA voor 2024 als bevoegde autoriteit

### 1. Voorstelling

De Vlaamse Regulator voor de Media (VRM) werd bij decreet van 26 januari 2024 aangeduid als een bevoegde autoriteit in de zin van artikel 49 van de DSA.<sup>42</sup>

De VRM is op 16 december 2005 opgericht als agentschap van de Vlaamse overheid met als missie de handhaving van de mediaregelgeving binnen de Vlaamse Gemeenschap van België, in het licht van de toegewezen bevoegdheid van de Gemeenschappen in België voor zowel inhoudelijke als technische aspecten van omroepactiviteiten.<sup>43</sup>

De VRM is in de eerste plaats een 'nationale regulerende instantie' overeenkomstig artikel 30 van de Europese Richtlijn Audiovisuele Mediadiensten, maar is ook één van de nationale regelgevende instanties in België, in de zin van het Europees wetboek voor elektronische communicatie.<sup>44</sup>

Als één van de vier bevoegde autoriteiten voor de DSA in België, is de VRM in beginsel bevoegd voor alle aspecten van de DSA, voor zover het gaat om 'tussenhandeldiensten die betrekking hebben op omroepactiviteiten' en waarvan de aanbieder is gevestigd in het Nederlandse taalgebied of in het tweetalige gebied Brussel-Hoofdstad, in het laatste geval op voorwaarde dat de dienst uitsluitend gericht is op de Vlaamse Gemeenschap.

De samenwerking met de andere voor de DSA bevoegde autoriteiten in België en de Belgische digitaledienstencoördinator (BIPT) is geregeld in een samenwerkingsakkoord van 3 mei 2024.<sup>45</sup> Daarin zijn onder meer procedures voor overleg en informatie-uitwisseling opgenomen, met name wat betreft het behandelen van klachten, het certificeren van buitengerechtelijke geschillenbeslechtsorganelen, het toekennen van de status van 'betrouwbare flagger', het toekennen van de status van erkend onderzoeker en het bijwonen van de vergaderingen van de Europese Digitaledienstenraad.

De VRM beschikt in het kader van zijn taken over onderzoeksbevoegdheden en de mogelijkheden om sancties, zoals administratieve geldboetes, op te leggen.<sup>46</sup> De beslissingen worden genomen door de 'algemene kamer' en de 'kamer voor onpartijdigheid en bescherming van minderjarigen'. De VRM-administratie telt 21 personeelsleden, waarvan één zich toelegt op het toezicht en de handhaving van de DSA.

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<sup>42</sup> Decreet van 26 januari 2024 tot wijziging van het decreet van 27 maart 2009 betreffende radio-omroep en televisie tot gedeeltelijke uitvoering van de digitaledienstenverordening, *BS* 16 februari 2024.

<sup>43</sup> Decreet van 16 december 2005 houdende de oprichting van het publiekrechtelijk vormgegeven extern verzelfstandigd agentschap Vlaamse Regulator voor de Media en houdende wijziging van sommige bepalingen van de decreten betreffende de radio-omroep en de televisie, *BS* 30 december 2005 en Decreet van 27 maart 2009 betreffende radio-omroep en televisie (het Mediadecreet), *BS* 30 april 2009, m.n. artikel 218.

<sup>44</sup> Richtlijn 2010/13/EU van het Europees Parlement en de Raad van 10 maart 2010 betreffende de coördinatie van bepaalde wettelijke en bestuursrechtelijke bepalingen in de lidstaten inzake het aanbieden van audiovisuele mediadiensten (richtlijn audiovisuele mediadiensten), *Pb.L.* 95 15 april 2010, p. 1.

Richtlijn (EU) 2018/1972 van het Europees Parlement en de Raad van 11 december 2018 tot vaststelling van het Europees wetboek voor elektronische communicatie, *Pb. L.* 321 17 december 2018, p. 36.

<sup>45</sup> Samenwerkingsakkoord van 3 mei 2024 tussen de Federale Staat, de Vlaamse Gemeenschap, de Franse Gemeenschap en de Duitstalige Gemeenschap inzake de gecoördineerde gedeeltelijke tenuitvoerlegging van Verordening (EU) 2022/2065 van het Europees Parlement en de Raad van 19 oktober 2022 betreffende een eengemaakte markt voor digitale diensten en tot wijziging van Richtlijn 2000/31/EG (digitaledienstenverordening), *BS* 30 december 2025.

<sup>46</sup> Zie m.n. artikel 228 e.v. van het Mediadecreet.

## 2. Klachten (artikel 53 van de DSA)

De VRM heeft in 2024 geen klachten ontvangen, noch behandeld, in de zin van artikel 53 van de DSA.

## 3. Bevelen (artikelen 9 en 10 van de DSA)

De bevelen die uitgaan van Belgische sectorale autoriteiten zoals bedoeld in de artikelen 9 en 10 van de DSA worden gecentraliseerd door de digitaledienstencoördinator (BIPT).

## 4. Buitengerechtelijke geschillenbeslechtsingsorganen (artikel 21 van de DSA)

In 2024 heeft de VRM geen officiële verzoeken ontvangen tot het certificeren van buitengerechtelijke geschillenbeslechtsingsorganen in de zin van artikel 21 van de DSA.

## 5. Betrouwbare flaggers (artikel 22 van de DSA)

In 2024 heeft de VRM geen officiële verzoeken ontvangen tot het toekennen van de status van 'betrouwbare flagger'. De VRM heeft wel verschillende vragen om informatie hieromtrent beantwoord.

## 6. Erkende onderzoekers (artikel 40 van de DSA)

In 2024 heeft de VRM geen officiële verzoeken ontvangen tot het toekennen van de status van erkend onderzoeker. De VRM heeft wel verschillende vragen om informatie hieromtrent beantwoord.

## 7. Handhaving en (inter)nationale activiteiten

### 7.1. Nationale activiteiten

De VRM heeft in de eerste plaats op zijn website een aparte rubriek gewijd aan informatie over de DSA, met name over het toepassingsgebied, (de taken van) de bevoegde autoriteiten in België en de rol van de Europese Commissie.<sup>47</sup> De VRM heeft aansluitend ook door het beantwoorden van verdere vragen om informatie nader toelichting gegeven over de DSA.

De VRM heeft in 2024 deelgenomen aan veelvuldige overlegmomenten en -vergaderingen met de andere bevoegde autoriteiten en de digitaledienstencoördinator van België, om informatie uit te wisselen, af te stemmen over de handhaving van de DSA in België en Europese vergaderingen voor te bereiden.

De VRM heeft ook deelgenomen, vaak samen met de andere voor de DSA bevoegde autoriteiten in België, aan informatievergaderingen met verschillende belanghebbenden, met name vertegenwoordigers van sociale media platforms, organisaties gericht op de bescherming van grondrechten en Belgische overheidsdiensten.

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<sup>47</sup> Zie <https://www.vlaamseregulatormedia.be/nl/digitaledienstenverordening-dsa>.

## 7.2. Internationale activiteiten

De VRM heeft in 2024, aan de zijde van de Belgische digitaalendienstencoördinator, deelgenomen aan de vergaderingen van de Europese Digitaalendienstenraad, voor zover de beperkingen op het aantal deelnemers per lidstaat dit toelieten en desgevallend volgens een rotatiesysteem onder de bevoegde autoriteiten van de Gemeenschappen van België. De VRM was ook lid van één van de werkgroepen binnen de Digitaalendienstenraad en heeft in dat kader de verschillende werkgroepvergaderingen bijgewoond.

De VRM heeft verder in 2024 ook deelgenomen, in zijn hoedanigheid als 'nationale regulerende instantie' overeenkomstig de Europese Richtlijn Audiovisuele Mediadiensten, aan de specifieke subgroep binnen ERGA (*European Regulators Group for Audiovisual Media Services*) met betrekking tot de EU regelgeving over digitale diensten, waarin met name de relatie tussen (de procedures uit) de DSA en de Richtlijn Audiovisuele Mediadiensten werd onderzocht en besproken.