

(English version)

**Priority question for written answer P-001181/26
to the Commission
Pascal Arimont (PPE)
(20 March 2026)**

Subject: Scope of Article 25 of Regulation (EU) 2024/1083 as regards funded organisations

Article 25 of Regulation (EU) 2024/1083 requires public sector bodies that use public funds for state advertising or make decisions in this regard to comply with transparent criteria and to publish relevant information. There are different interpretations in the Member States as to whether and to what extent funded organisations also fall within its scope.

1. How does the Commission interpret the scope of Article 25 with regard to organisations constituted under private law (e.g. VoG/ASBL under Belgian law) that receive public subsidies or are contractually linked to a government, in particular when they carry out communication activities?
2. Is it decisive whether such organisations actually decide on the allocation of public funds to media for state advertising, or can the mere use of public funds for their own communication activities render Article 25 applicable?
3. Can national authorities provide that obligations under Article 25 only apply above certain thresholds (e.g. in terms of the sums involved) and under what conditions would this be compatible with the regulation?

Submitted: 20.3.2026

**Answer given by Executive Vice-President Virkkunen on behalf of the European Commission
(8 May 2026)**

The objective of Article 25 of the European Media Freedom Act ⁽¹⁾, applicable as of 8 August 2025, is to ensure transparency in the allocation and use of public funds for state advertising, thereby supporting undistorted competition between media service providers and online platforms and reducing the risk of covert subsidies and undue political influence on the media.

For Article 25 to apply, public funds have to be made available by a ‘public authority or entity’, defined as a national or subnational government, a regulatory authority or body, or an entity controlled, directly or indirectly, by a national or subnational government; the recipient has to be a media service provider or a provider of online platform; and the aim of spending has to be ‘state advertising’, defined as the placement, promotion, publication or dissemination of a promotional or self-promotional message or a public announcement or an information campaign.

Therefore, without prejudging what a possible interpretation by the Court of Justice of the EU may find, organisations constituted under private law would be covered where they are controlled, directly or indirectly, by a national or subnational government and make available public funds for state advertising to media service providers or providers of online platforms.

Article 25 does not provide for general thresholds limiting its application based on the level of expenditure. The only flexibility explicitly foreseen concerns certain subnational authorities, which may be exempted from publishing specific information (namely, business group data under Article 25(2)(b)), reflecting proportionality considerations.

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⁽¹⁾ 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, <https://eur-lex.europa.eu/eli/reg/2024/1083/oj/eng>.