

Convergence in everyday life

Double anniversary
Medienrat/German Speaking Community of Belgium



Michèle Ledger
Cullen International, Unamur
October 2025

TIZEN™
SAMSUNG

 **YouTube**

 **PS5™**

webOS
 **LG**

pluto 



 **Google TV**

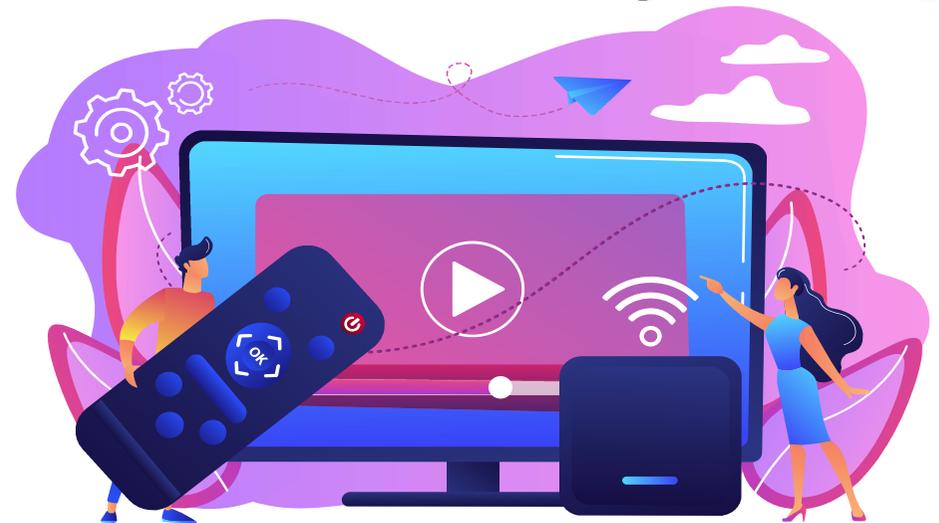
peacock 

fire tv stick

ROKU



alexa



The grey zone of EU legislation

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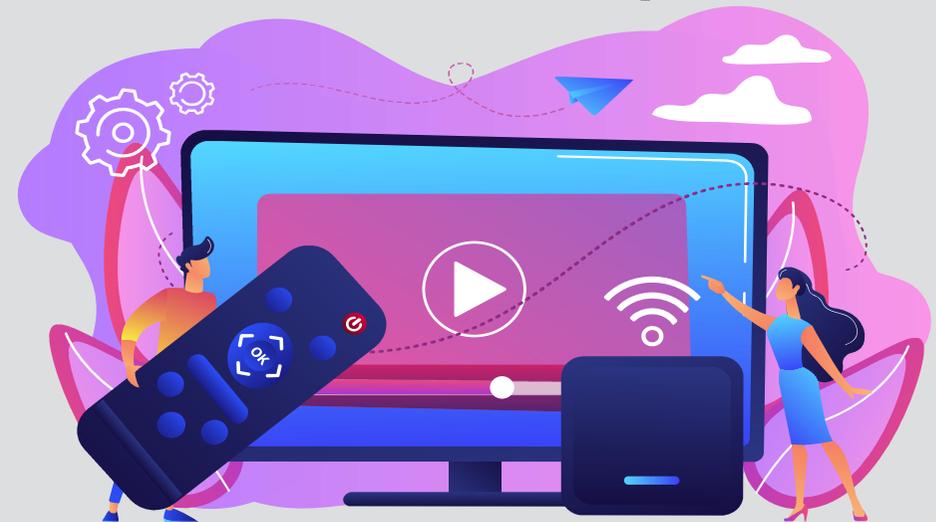
peacock 

fire tv stick


ROKU



alexa

Under what EU legislation?

EECC

AVMSD

Ecom D

DSA

EMFA

NL & UK

Under what EU legislation?

EECC

Probably not an
ECS
Could be subject to
must carry

AVMS

...

Ecom D

DSA

EMFA

Under what EU legislation?

EECC

Probably not an
ECS
Could be subject to
must carry

AVMS

No editorial
responsibility
But prominence
could be imposed
under Art 7.A
VSP?
Partial application

Ecom D

DSA

EMFA

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VSP?
Partial application
...

Ecom D

Most will qualify as
information society
services
(country of origin
principle applies)

DSA

EMFA

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...

Ecom D

Most will qualify as
information society
services
Country of origin
principle
...

DSA

A few will qualify
as online platforms
(rules on
recommender
systems and
protection of
minors apply,
possibly risk
assessments if very
large)

EMFA

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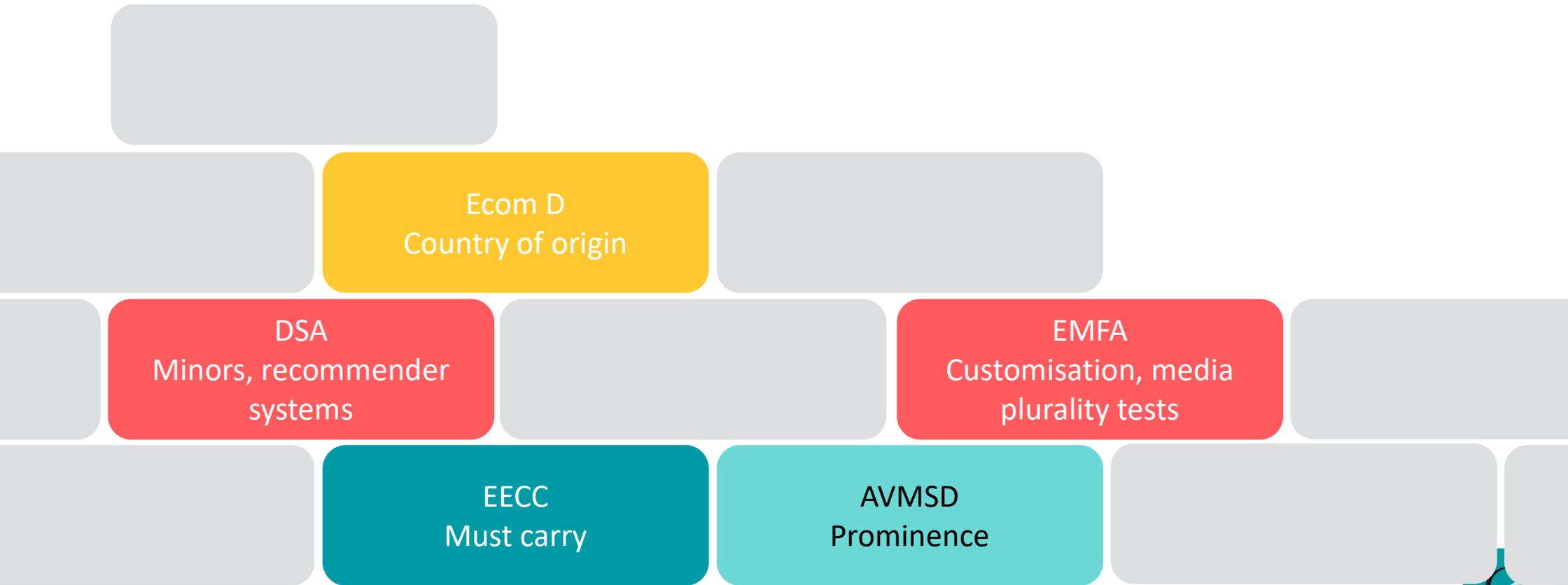
DSA

A few will qualify
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Rules on
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EMFA

-Devices or
user
interfaces
-Online
platforms
providing
access to
media
content
(customisatio
n and
media
plurality test,
media
privelege)

Not enough bricks in the wall...



Some Member States regulate the (traditional) distribution of AVMS

- Declarations/registrations
- Accessibility
- Investment obligations into local content creation
- Protection of minors
- Price transparency
- Prior notification of channels on platforms

...



● Yes, the category exists ● Not proposed

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Prominence of audiovisual services of general interest (art 7a AVMSD)

- Five Member States have or are planning rules on prominence
- France, Germany and Italy are the most advanced countries
- Ireland has not started the process yet
- Flanders has submitted a draft decree to the European Commission for scrutiny under the Regulatory Transparency Procedure



● Adopted or under discussion ● Not introduced

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Observations

1. Platforms are proliferating
2. EU law on platforms is embryonic and piecemeal
3. National law exists and is not always in line with the internal market rules
4. Is it not time to consider refocussing EU audiovisual media legislation on the platforms that distribute media content?







Thank you!

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