

MONITORING MEDIA PLURALISM IN THE EUROPEAN UNION

RESULTS OF THE MPM2025

Country report: Luxembourg

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Report

June 2025

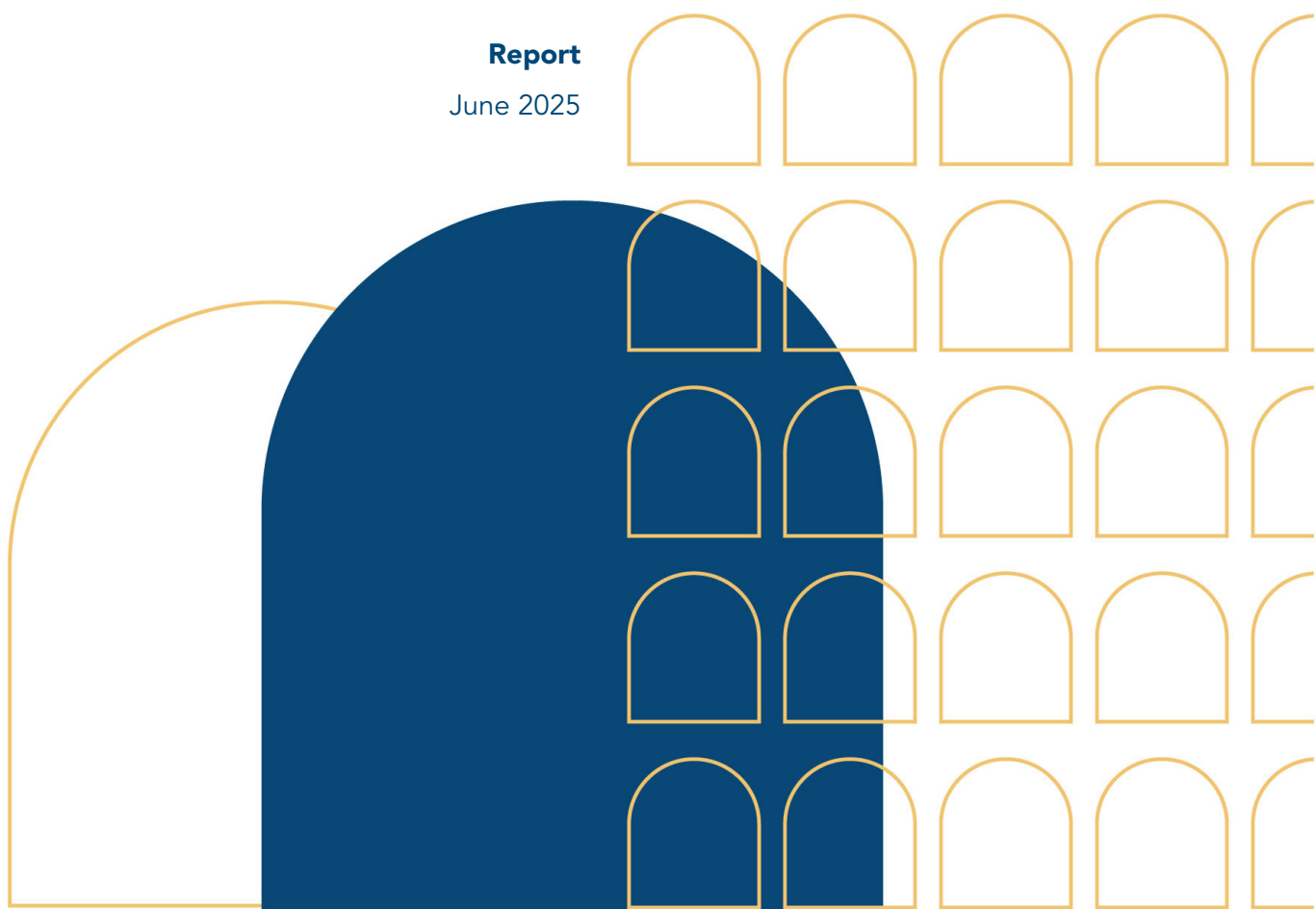


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1. Note from the MPM team

The *Media Pluralism Monitor* underwent significant transformations in 2025. First, the risk assessment was expanded from a three-tier - low, medium, and high risk - to a six-tier system, as follows:

- Very low risk (Rounded score comprised between 0 % and 16% included) - represented in green
- Low risk (Rounded score comprised between 17% and 33% included) - represented in light green
- Medium-low risk (Rounded score comprised between 34 % and 50% included) - represented in yellow
- Medium-high risk (Rounded score comprised between 51% and 66% included) - represented in orange
- High risk (Rounded score comprised between 67% and 83% included) - represented in red
- Very high risk (Rounded score comprised between 84% and 100% included) - represented in bordeaux

The adoption of the six-tier system aimed at providing a more granular assessment of the risk to media pluralism and freedom. This increased granularity also aimed at shifting from percentage-based risk reporting to risk-band reporting, that allows more comparability over the years, giving the constant changes of the MPM questionnaire.

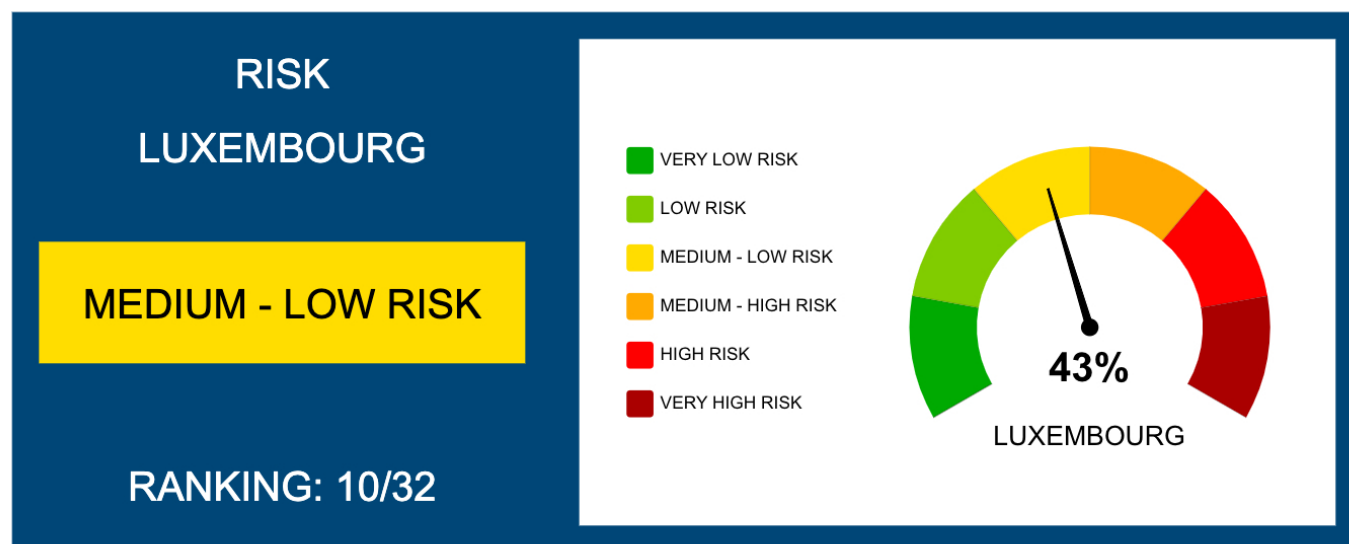
The structure of the MPM report also changed. It is now composed of three parts as follows:

- **Results snapshot** - provides an executive summary of the risks to media pluralism and freedom in the country studied.
- **In-depth results** - provides a more detailed overview of the MPM results per area, including some specific recommendations for each country
- **EMFA Observatory - Year 1 : Before the implementation** - provides a summary of the risk assessment on specific topics that are in line with the content of the European Media Freedom Act (EMFA), which will enter into full force in August 2025 in European Member States. Most of the standards mentioned in the EMFA were already monitored in the past editions of the MPM. This purpose of this section is to increase their visibility.

For specific changes in the questionnaire, please refer to Part 6 - *MPM Methodology*.

For every edition of the MPM, the CMPF updates and fine-tunes the questionnaire considering the evolution of the information and media sphere, the existence of newly available data, and based on the regular evaluation of the tool after its implementation. The methodological changes are explained on the CMPF website at <http://cmpf.eui.eu/media-pluralism-monitor/>.

2. Results snapshot



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Country Overview

Luxembourg is a very stable country, with strong political parties and powerful trade unions. The Christian Social People's Party (CSV) has been Luxembourg's largest party at the national level since 1945 and has governed all the political coalitions in power after the war, with the exception of the periods from 1974 to 1979 and from 2013 to 2023 (two terms with the electoral coalition composed of the Liberal Party (DP), the Socialist Party (LSAP) and the Green Party (Déi Gréng)). Since the legislative elections of October 2023, the CSV party has returned to power in coalition with the DP. After 25 years of reign, which began on 7 October 2000, Grand Duke Henri of Luxembourg announced in his Christmas speech that he would abdicate on 3 October 2025 so that his son Guillaume, the current Hereditary Grand Duke Lieutenant-Representative, succeed him.

The media market in Luxembourg is limited and highly fragmented in linguistic and cultural terms. The media offer is rich in relation to the size of the country and the number of inhabitants. The print media sector includes four daily newspapers (Luxemburger Wort, Tageblatt, Le Quotidien, Zeitun vun Lëtzebuerger Vollek), one free daily newspaper (L'essentiel), an online investigative media outlet Reporter.lu and several magazines, weeklies and monthlies. There are several online news media and television channels, only one of which (RTL) offers daily programming, but residents also have access to channels from neighbouring countries. The television market is dominated by RTL, which has 'public service missions' but is not a 'public service media' (PSM), insofar as it is primarily a commercial medium. There are five private radio stations with national or wide coverage and only one broadcaster (Radio 100.7) that is officially recognised as a public service medium. Despite this apparent diversity, there is a very high concentration (horizontal and vertical) of the market, since the majority of the national press belongs to two groups, while the radio and television sectors are dominated by a single group (CLT-UFA). The country also plays an important role in the management of international media franchises. Internet coverage is very good throughout the country.

The year 2024 was marked in Luxembourg by the launch of the reform of the law on electronic media. The amended law of 27 July 1991 on electronic media has undergone numerous ad hoc revisions but has not yet been subject to an overall reassessment since it came into force more than thirty years ago. However, the Luxembourg media landscape is constantly evolving. It is now possible to obtain information through the

traditional channels of the news media such as radio, television and newspapers, but also increasingly via online sites and social network news feeds with content creators. In addition, the convergence of traditional media and online services has created a complex and interconnected media ecosystem, posing new and varied challenges in terms of regulation. These new issues require a thorough reassessment of media legislation in order to ensure effective regulation that is adapted to the current and future realities of the Luxembourg media landscape. To this end, a series of 5 conferences was organised to come up with ideas to inform the drafting of the new law on electronic media.

Concerning public service media, there is no change in the law but to fulfil its missions, the public service broadcaster Radio 100.7 benefits from a 2024-2030 multi-year agreement between the government and the radio station. This agreement grants the radio station a budget of nearly 79 million euros for the next seven years of activity, providing it with greater predictability for the future.

The PSM radio (radio 100.7) has introduced through a new law the creation of a listeners commission (*Conseil d'auditeurs*) that is in place. It is the first time that a media in Luxembourg has this type of participative audience advisory. The role of the audience advisory is to provide the 100.7 team with informed and critical feedback on the programmes.

The Act of 8 July 2024 amending the amended Act of 8 June 2004 on freedom of expression in the media introduces the right of reply for online publications.

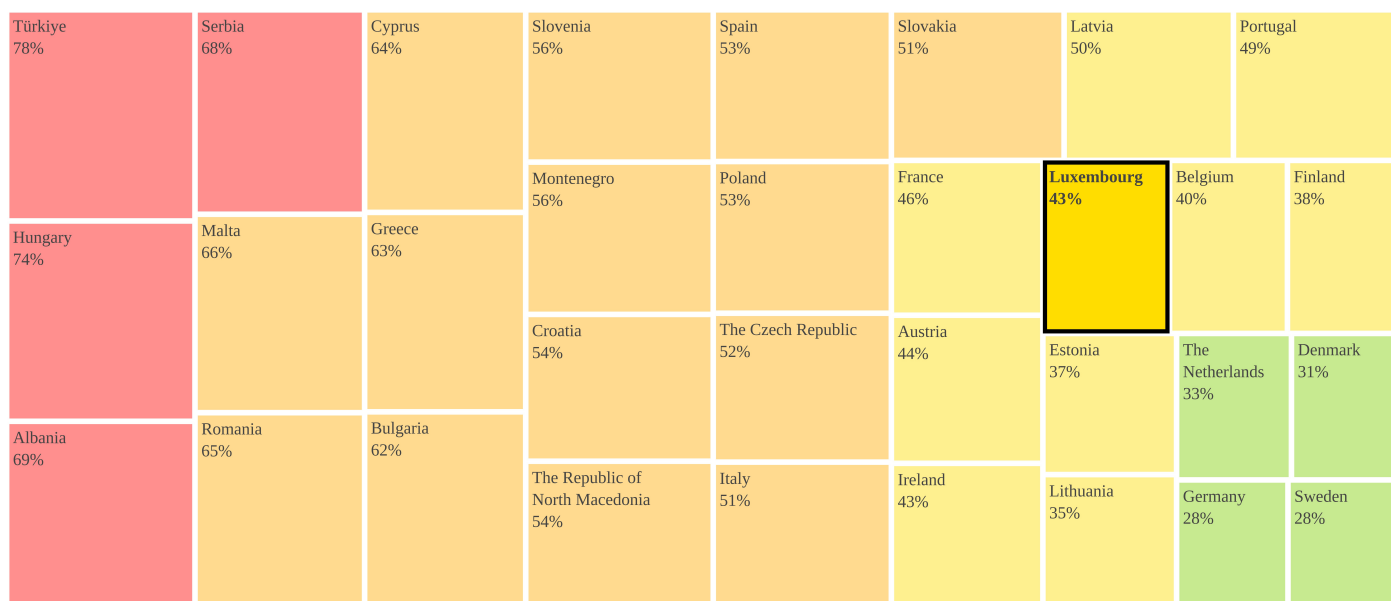
In 2024, the nomination procedure of the new ALIA director Cindy Bauwens has been contested leading to the departure of its long-standing chairman Thierry Hoscheit in July 2024, with his resignation effective 15 September 2024.

About financial support to news media, there is no change except in the future bill, which will only fund media of general interest for political and general news. The legislation provides fair and transparent rules for the distribution of direct subsidies to media outlets with Law of 30 July 2021 on an aid scheme for professional journalism. It does not include PSM as well as audio-visual media which are regulated by the 1991 law on electronic media.

Access to information will now be anchored in a bill amending three pieces of legislation. The bill was adopted by the Government Council on July 17, 2024, and tabled on July 24, 2024. This right of access to information will be introduced to facilitate the work of professional journalists, as part of a broader reform aimed at promoting democratic debate and press freedom in Luxembourg.

The guidelines for the European elections on June 9 2024 have also been published on the ALIA website. This was first implemented in line with the new law at local and national elections in 2023. While in 2023 some complaints were filed with ALIA regarding the local and national elections (see MPM 2024), no complaints were filed for the 2024 European elections. But there are no rules for political parties, candidates and lists competing in elections to report on campaign spending on online platforms in a transparent manner.

In Luxembourg, the "Autorité de la concurrence" (competition authority) has been appointed as Digital Services Coordinator and will be responsible for monitoring the compliance of platforms with the DSA in Luxembourg. Since February 17th 2024, online platforms have had to comply with the new DSA rules on content moderation.



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FUNDAMENTAL PROTECTION

LOW RISK

The **Fundamental Protection** area scores within the low risk band. Main changes include:

- The law of June 8, 2004 on freedom of expression (amended in 2010) was amended again on July 8, 2024, extending the legislation to online publications.
- Only the protection of the integrity of information is assessed as medium-low risk, particularly due to the fight against disinformation, which could be improved and the lack of data about platforms.
- The integrity of information concerning content creators is also under discussion within the Committee of Experts on Online Safety and Empowerment of Content Creators and Users (MSI-eSEC) of Council of Europe in which Luxembourg is elected.
- A reporting office for whistleblowers has been created but there is no report yet.
- There is a decrease in the number of journalists in Luxembourg despite the press aid scheme.

MARKET PLURALITY

MEDIUM - HIGH RISK

The **Market Plurality** area scores within the medium-high risk band. Main changes include:

- Disclosure of media ownership is partially provided to public bodies and the public.
- Despite the transposition of the Directive 2019/790 on copyright into Luxembourg national law, there is no specific financial agreements between generative AI providers and media providers to remunerate rights holders for the use of copyright-protected content.
- In Luxembourg, it can happen that media owners and other commercial entities attempt to influence editorial content.
- Several complaints regarding commercial influence have been filed with ALIA.

POLITICAL INDEPENDENCE

LOW RISK

The **Political independence** area scores within the low risk band. Main changes include:

- A bill was introduced which, among other reforms, changes the definition of the profession of journalist, at the request of the Press Council. As a result, the press card should be awarded to a journalist working with or on behalf of a political and general news publication.
- RTL has set up an ethics committee. In accordance with the RTL Luxembourg Journalists' Charter, CLT-UFA has set up an Ethics Committee made up of content managers (news and non-news) from RTL Luxembourg as well as one or more members of the editorial teams.
- From 2024 to 2030, the Luxembourg State also entrusted public service missions to RTL.
- In July 2024, the Electronic Media Act 1991 was amended to include new frequency allocations via DAB+ technology.

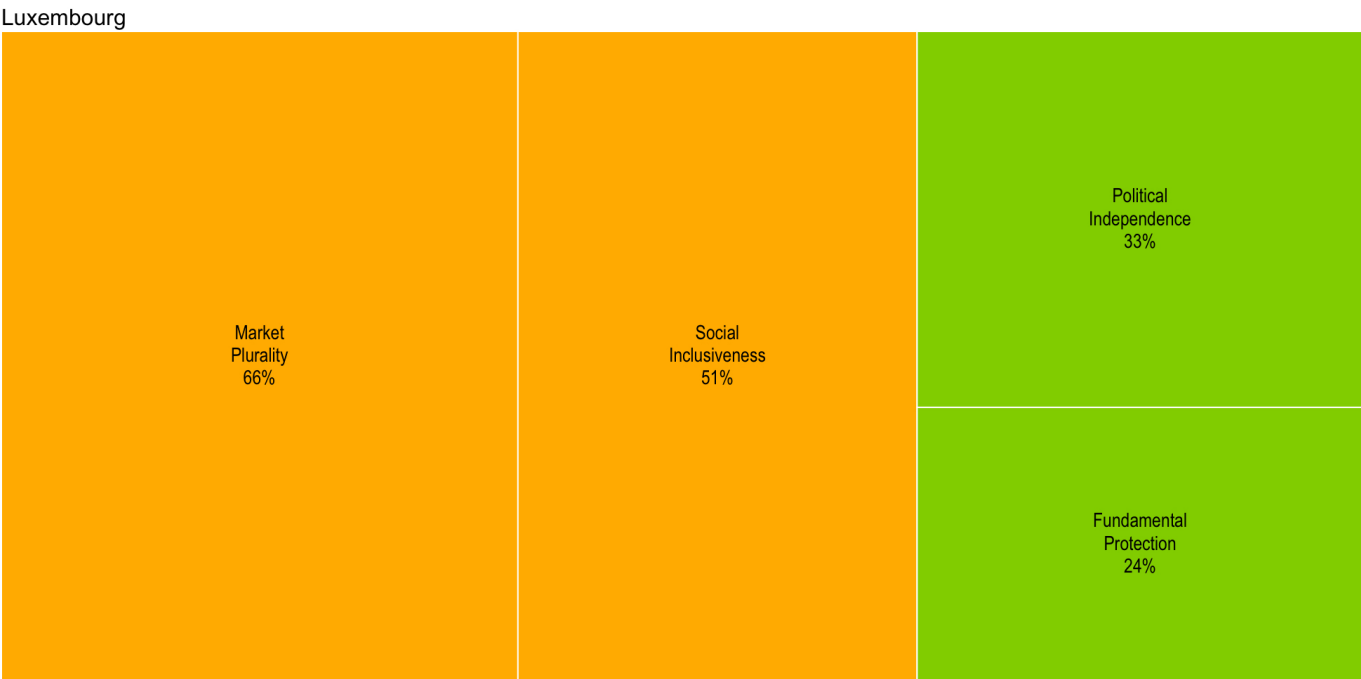
SOCIAL INCLUSIVENESS

MEDIUM - HIGH RISK

The **Social inclusiveness** area scores within the medium risk band. Main changes include:

- There were two cases of online hate speech in 2024.
- An RTL article sparked controversy in 2024 regarding the LGBTIQ+ community by using a male pronoun to refer to Nemo, the non-binary Eurovision winner.
- A TV programme reprimanded for targeting the marginalised beggar community (particularly Roma).

3. In-depth results

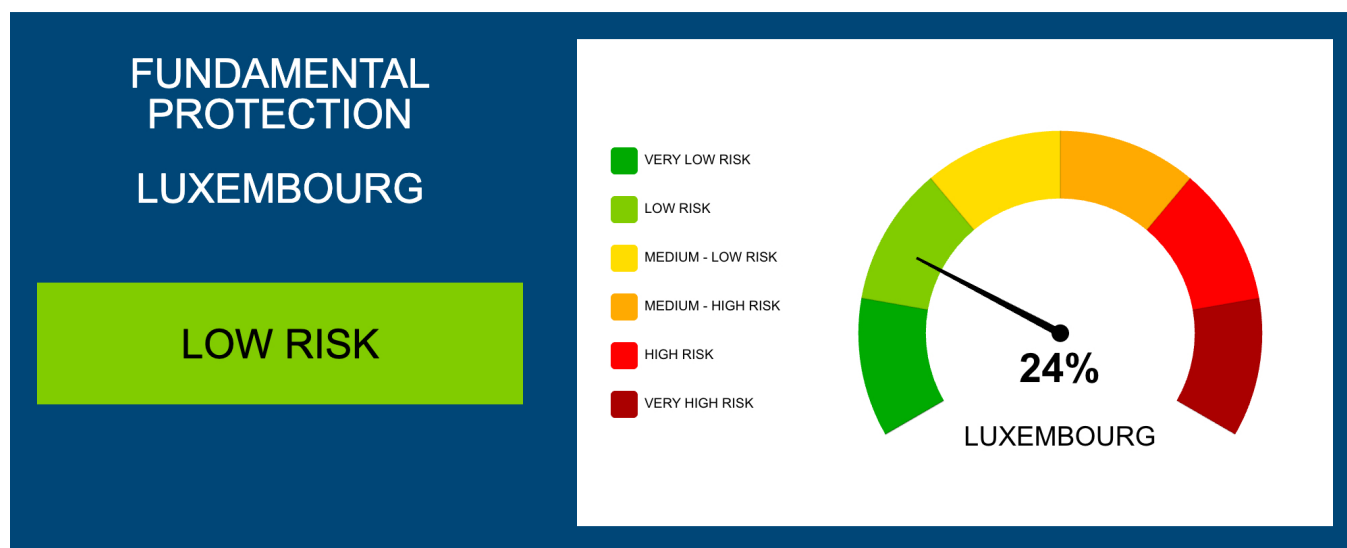


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The implementation of the *Media Pluralism Monitor 2025* in Luxembourg indicates that the highest risk ratings are for **Market Plurality** and **Social Inclusiveness**. **Market Plurality** and **Social Inclusiveness** are at medium-high risk. This is due to the concentration of its audiovisual market and the non-official recognition of minorities in Luxembourg. **Political Independence** scores a low risk, however scoring at the border with the medium-low band. Among major problematic points detected are the lack of regulatory safeguards against political control, the transparency of online political advertising and State advertising. The national audiovisual sector (i.e., television), which consists mainly of RTL (RTL Télé Lëtzebuerg), is considered relatively independent from political influence in practice, as its programming is defined by its public service missions and commercial logic. The **Fundamental Protection** area is assessed at a low risk.

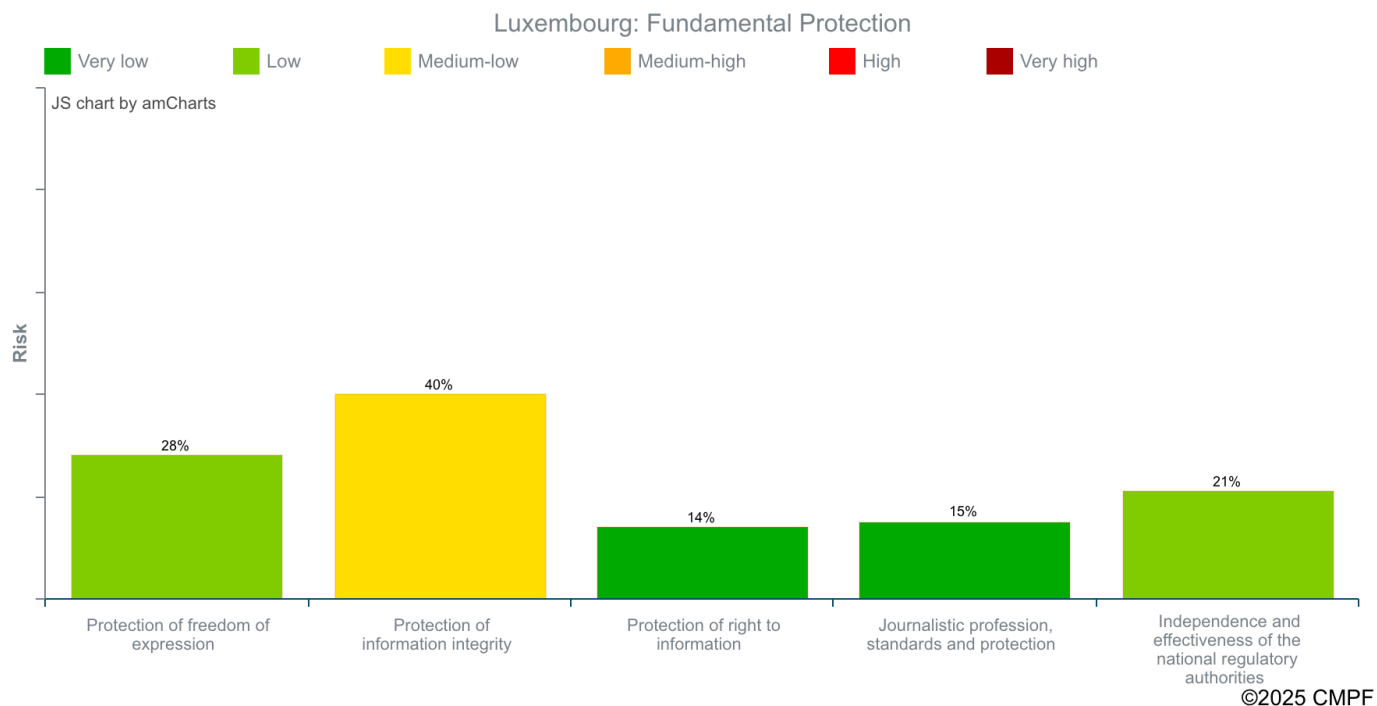
3.1. Fundamental Protection

The Fundamental Protection area considers the necessary preconditions for media pluralism and freedom, namely: the existence of effective regulatory safeguards to protect freedom of expression; the right to seek, receive and impart reliable and accurate information; favorable conditions for the free and independent conduct of journalistic work; the presence of independent and effective national regulatory authorities.



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Fundamental Protection presents a low or very-low risk for three out of four of the indicators assessed. Only the **Protection of integrity of information** indicator is assessed as medium-low risk, particularly due to the fight against disinformation, which could be improved and the lack of data about platforms. Luxembourg is also affected by the climate of mistrust towards journalists and professional information (Medialux, 2023 ; Mediareform, 2025). In addition, there is dissatisfaction with journalistic treatment of the information, which reflects a loss of confidence in the media in Luxembourg. According to the Medialux study on media use and reception in Luxembourg, 28.4% of respondents said they did not really trust information circulating on social networks when it came from a news site or a print or broadcast media organisation. 8.5% said they did not trust it at all. Only 3.2% have complete confidence, while 59.8% have developed a certain mistrust, indicating that they have some confidence (Medialux, 2023).



PROTECTION OF FREEDOM OF EXPRESSION

LOW RISK

Freedom of expression is safeguarded by both the Constitution and national legislation (Constitution, 1868). Specifically, Article 24 of Chapter 2 of the Luxembourg Constitution guarantees the freedom to express opinions across all domains and ensures press freedom, while also allowing for the punishment of offenses committed in the exercise of these freedoms. The Constitution explicitly prohibits censorship. Luxembourg ratified the European Convention on Human Rights (ECHR) on September 3, 1953, without reservations or objections concerning freedom of expression. Restrictions on this freedom are clearly defined by law and must pursue legitimate aims, as outlined in Article 10(2) of the ECHR. Freedom of expression is further reinforced by the Freedom of Expression Act of June 8, 2004, which was amended in 2010 and most recently in 2024 (Loi du 8 juin 2004 sur la liberté d'expression, 2004). Notably, Article 2 of this Act refers to Article 10 of the ECHR to stipulate that any interference or restrictions must be prescribed by law, serve a legitimate purpose, be necessary in a democratic society, address a compelling social need, and remain proportionate. Additionally, Article 6 affirms the right to receive and seek information, to freely communicate this information to the public, and to comment on or criticize it. While freedom of expression is robustly protected, its practice comes with "obligations and responsibilities." Legal limits are imposed to safeguard the rights of others. The 2004 Law on freedom of expression introduced specific defenses against defamation in media-related cases; these provisions were later incorporated into Article 443 of the Penal Code. Furthermore, Article 457-1 of the Penal Code prescribes prison sentences for individuals who incite acts of hatred or violence against a person, entity, group, or community (Code pénal, 2023).

Citizens have access to legal remedies if their freedom of expression is infringed upon. They may bring cases before civil or criminal courts if they believe their rights under media laws or freedom of expression have been violated. The law on media also provides for expedited proceedings in cases involving alleged censorship or erroneous summonses. Complaints related to the audiovisual sector can be referred to administrative authorities such as the Luxembourg Independent Media Authority (ALIA), as stipulated under Article 5. Additionally, ministers responsible for family affairs, justice, culture, and national education—as

well as the Ombudsman for Children and Youth (*Ombudsmann fir Kanner a Jugendlecher*)—may refer complaints to ALIA under Article 11.

The key legislation applied in cases involving violations of freedom of expression includes the Law on electronic media (Loi sur les médias électroniques 1991, last amended in 2015), the Law on freedom of expression (Loi sur la liberté d'expression, 2004, last amended in 2010), the European Convention on Human Rights (ECHR), and the Law on privacy protection (1982). Luxembourg maintains a proportionate balance between protecting freedom of expression and ensuring dignity. For example, defamation can be penalized with imprisonment. Depending on the severity of the offense, penalties range from eight days to one year in prison and fines between €251 and €2,000 (Articles 444–452 of the Penal Code) (Code Pénal, 2023).

Issues requiring particular scrutiny :

- **Extension of citizens' right to reply to online media.**

The draft law on promotion of professional journalism and democratic debate, presented before the Parliament on July 24, 2024, aims to extend the citizens' right to reply to online media as well.

- **Transposition of anti-SLAPP directive.**

Luxembourg has a two-year window to transpose the European anti-SLAPP directive into its national legislation. On March 19, 2024, Luxembourg's Minister of Justice, Elisabeth Margue, welcomed the adoption of this directive by the Council of the European Union, following its approval by the European Parliament on February 27, 2024. This transposition is crucial as Luxembourg currently lacks specific legislation against Strategic Lawsuits Against Public Participation (SLAPPs) or any other safeguards to address manifestly unfounded or abusive legal proceedings that threaten public participation, democratic values, and fundamental rights, including the right to a fair trial and freedom of expression. Luxembourg is not immune to such lawsuits or other vexatious legal actions seeking disproportionate damages aimed at harassing and silencing critics. Between 2019 and 2022, four SLAPPs were recorded in Luxembourg (The Case, 2023 ; Pepin, September 27th 2024). According to the Coalition Against SLAPPs in Europe, Luxembourg ranks fifth among countries with the highest number of SLAPPs per capita. *Paperjam* reports that journalists from Reporter.lu, D'Lëtzebuerger Land, and Paperjam have fallen victim to SLAPPs.

PROTECTION OF INFORMATION INTEGRITY

MEDIUM - LOW RISK

Public authorities require Internet Service Providers (ISPs) to manage network traffic in a manner consistent with freedom of expression and the right of access to information. This is in accordance with the law of December 17, 2021, which transposes Directive (EU) 2018/1822 of the European Parliament and of the Council of December 11, 2018. This directive establishes the European Electronic Communications Code and amends the law of May 30, 2005 on electronic communications.

Any user of an online platform can file a complaint with the Competition Authority if providers of online intermediary services fail to comply with their obligations under the European Digital Services Act (DSA). Additionally, the BEE SECURE Helpline offers a free, anonymous, and confidential telephone consultation service for children, young people, parents, adults, teachers, and educators. It provides information, advice, and personalized support on online safety and the responsible use of information and communication technologies.

In some aspects, however, the integrity of information presents a moderate risk. Public authorities do not report or communicate about their requests for content moderation to platforms or traffic management to Internet Service Providers (ISPs). A comprehensive and coordinated public strategy to combat disinformation is still lacking. Additionally, there are no established policies or measures to identify and address the threat of foreign information manipulation and interference (FIMI). These issues should be

addressed as part of the ongoing reform of the law on electronic media.

Issues requiring particular scrutiny :

- **Compliance with the new Digital Services Act (DSA) rules on content moderation.**

From February 17, 2024, providers of intermediary services (online platforms, access providers, hosting services, search engines, etc.) must regularly publish transparency reports on their content moderation activities. These reports must adhere to regulatory requirements. Hosting services and online platforms also have to clearly and thoroughly explain the reasons for imposing restrictions on illegal content or content that is incompatible with their general terms and conditions. For the sake of consistency, they must align these reasons with the categories defined by the regulation. The first data collection in accordance with the implementing regulation will begin on July 1, 2025, and the first reports must be submitted by the end of February 2026. The Competition Authority has been designated as the Digital Services Coordinator (DSC) for the implementation of the Digital Services Act (DSA) in Luxembourg.

- **Public strategy to combat disinformation.**

Luxembourg is not immune to disinformation, as was the case in 2024 with several deepfakes targeting Luxembourg personalities and created using artificial intelligence proliferating on social networks. Additionally, according to a representative survey realized by the University of Luxembourg (Medialux project) in October 2023, 99% of the population declare to come across false or distorted information in social media. Among them 20% declare that this happens “very often” and 41% “often”. A national public strategy (including legal, co-regulatory or self-regulatory frameworks) is currently being considered and developed in Luxembourg to combat disinformation. Initiatives that already exist in Luxembourg and are part of an overall strategy include Bee Secure, with its stopline (to report illegal content), the organization that publishes documents and educational materials for teachers to combat disinformation, and the *Zentrum für politisches Bildung* (Center for Citizenship Education), ALIA engagement to promote media education. However, these initiatives are still sparse and not coordinated. Moreover, there is a lack of research on disinformation, which can be explained by the absence of a dedicated media and journalism department at the University of Luxembourg. In fact, we can only highlight a few national initiatives on disinformation: Edmo Belux, a research center working on disinformation in Belgium and Luxembourg, whose mission includes fact-checking, promoting media literacy and conducting research, the Remedis project on socio-technical solutions to counter online disinformation, and the Medialux project, which studies the use and reception of the media in Luxembourg, including social networks and professional journalistic news media. A comparative study has been carried out on reinformation (a form of disinformation which consists of reusing journalistic content by truncating part of it) and its consequences on the practices of journalists in Luxembourg. In sum, research on disinformation is still in its infancy and would benefit from being clearly developed and anchored in the long term to be able to measure the consequences of disinformation on the integrity of information. This is intended to feed into and enhance media literacy.

- **External disinformation threats.**

Currently, there are no identifiable measures against foreign information manipulation and interference (FIMI). Despite the awareness of the risk of FIMI, particularly through conferences and scientific work

carried out in Luxembourg, there are still no policies or measures in place to identify and address the threat of manipulation and interference of foreign information. The subject was discussed during the Mediareform series of public conferences, a cycle organized by the Department of Media, Connectivity and Digital Policy of the Government of the Grand Duchy of Luxembourg and the University of Luxembourg as part of the Luxembourg Medialux Research Convention, led by Minister Elisabeth Margue, delegate to the Prime Minister, in charge of media and connectivity. This series of five conferences was organized around the theme of disinformation, media reform and social networks, all with respect for freedom of expression and information. The various Luxembourg actors in the fight against disinformation were invited to participate in discussions with national and international experts, in order to understand the various issues at stake and to contribute to the choice of the best strategy for reforming Luxembourg law on electronic media. In addition, one of the indirect problematic cases of the dissemination of disinformation is that of the Russia Today (RT) channel broadcast via SES, a Luxembourg industrial company in which the State holds a 33.3% stake. SES has confirmed that one of its satellites is used to broadcast Russia Today in India. The SES satellite channel continues to broadcast Russia Today in India, despite the efforts of the company and the Luxembourg government to stop it.

- **Integrity of information from content creators.**

Content creators compete with journalists by producing information that is not always honest or respectful of journalistic ethics and deontology. This has to be considered also in light of the fact that around 64.7% of the Luxembourg public is satisfied with journalistic coverage (Medialux, 2023), while 24.3% say they are rather dissatisfied^[2]. This issue in order to protect the integrity of information and to avoid misinformation and disinformation is currently discussed within the Committee of Experts on Online Safety and Empowerment of Content Creators and Users (MSI-eSEC) of the Council of Europe^[1], in which Luxembourg is represented. Under the authority of the Committee of Ministers and the Steering Committee on Media and Information Society, recommendations will be made to the member states of the Council of Europe. This committee is elected for a term of office from 1 January 2024 to 31 December 2025. The report with the recommendations is due to be published on 31 December 2025.

PROTECTION OF RIGHT TO INFORMATION

VERY LOW RISK

In 2024, a bill was introduced to grant access to information for journalists and promote professional journalism and democratic debate. This legislation aimed to facilitate the work of professional journalists as part of a broader reform to enhance democratic discourse and press freedom in Luxembourg. The Frieden government, by proposing this bill, responded to a long-standing request from the Press Council to enshrine the right of access to information for journalists in law (Gouvernement luxembourgeois, 2024). The bill, which enshrines access to information, amends three existing legislative texts. It was adopted by the Government Council on July 17, 2024. One of its objectives is to align the national legal framework with the Council of Europe Convention on Access to Official Documents (Tromsø Convention).

Additionally, the protection of whistleblowers is governed by the law of May 16, 2023, which transposes Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of persons who report violations of Union law. This law extends the material scope of the directive to all national law and guarantees effective and balanced protection for whistleblowers, by conferring a

genuine status on whistleblowers, with clearly defined rights and obligations. This legislative change represents significant steps towards enhancing transparency, protecting press freedom, and safeguarding those who report violations of the law in Luxembourg. The CET (*Centre pour l'Égalité de Traitement*) was designated as the competent authority for receiving reports in its areas of competence.

Issues requiring particular scrutiny :

- **Dispute over Access to Information**

The Luxembourg Association of Professional Journalists (ALJP) and journalist Charlotte Wirth have filed a complaint against the Ministry of the Interior (ALJP, 2024). The dispute concerns access to documents to which the journalist is entitled under a decision of the Commission for Access to Documents (CAD), but which have been refused by the ministry. According to the ALJP, Wirth's investigation was blocked for years due to the Ministry of the Interior's refusal. This case is particularly significant as Luxembourg's law on the right of access to information is currently under revision (Gouvernement luxembourgeois, 2024 ; Le quotidien, 2024) and the outcome could have a substantial impact on future transparency regulations.

- **Whistleblower Protection**

While the status of whistleblowers has been a topic of debate in Luxembourg in recent years, particularly due to the Luxleaks case, there have been no notable cases reported in 2024. A reporting office has been established under the authority of the Minister of Justice. The reporting office was set up in December 2023, but no data on reports is currently available. To raise public awareness, the Ministry of Justice has created an informational video about the new law (Ministère de la justice, 2024).

**JOURNALISTIC PROFESSION,
STANDARDS AND PROTECTION**

VERY LOW RISK

In Luxembourg, the Press Council, a public law body, is responsible for protecting professional standards in journalism. It comprises an equal representation of journalists (50%) and media company representatives (50%), appointed by the ALJP (Luxembourg Association of Professional Journalists) and the ALMI (Luxembourg Association of News Media), respectively. Since 2024, Lynn Warken, managing director of Lëtzebuerger Journal, has been serving as the new president of the Press Council, the Luxembourg Association of Professional Journalists (ALJP) plays a crucial role in defending journalists' interests and ensuring compliance with professional standards. Its membership consists of professional journalists, both employed and freelance, who are recognized by the Press Council or an equivalent foreign institution. Recently, the Luxembourg Association of Independent Media Publishers (ALEMI) was established; ALEMI aims to become PHARE (*Pôle d'honnêteté et d'autorégulation pour la responsabilité éditoriale*) in 2025, advocating for the interests of small and specialized editors.

The law of July 30, 2021, on a support scheme for professional journalism aims to maintain a fair level of journalistic diversity and stable working conditions. This legislation updates the state subsidy system that has been in place since 1976 to support media pluralism in Luxembourg.

Issues requiring particular scrutiny :

- **New definition for professional journalists.**

The draft law on promotion of professional journalism and democratic debate, presented before the Parliament on July 24, 2024, introduces significant changes to the definition of a professional journalist in Luxembourg. The new definition emphasizes "main profession and for remuneration" instead of "regularly carries out an activity from which they derive their main professional income". This change aims to simplify the verification of journalist status without requiring mandatory income checks by the Press Council. A more fundamental modification limits press card eligibility to journalists working for or on behalf of political and general news publications. This excludes journalists from specialized publications such as cultural, economic, or sports outlets. The legislator justifies this change by citing the Belgian law of December 30, 1963, arguing that journalists covering political and general news require more protection due to the sensitive nature of their work (*Projet de loi sur la promotion du journalisme professionnel et du débat démocratique, portant modification*, 2024). The bill has sparked controversy, particularly among journalists and editors from specialized publications. They express strong discontent as they will no longer benefit from the support and protections conferred by the press card. Additionally, this change will affect their eligibility for state subsidies, which are now based on the number of press cards rather than editorial pages. The recently founded Luxembourg Association of Independent Media Publishers (ALEMI) has criticized the bill, pointing out the inconsistency that sports journalists in general news media retain their press accreditation while those in specialist media may lose it. While the legislator argues that the new definition doesn't prevent specialized journalists from practicing their profession or voluntarily complying with the Press Council's code of ethics, the bill's impact on media diversity and specialized journalism in Luxembourg remains a subject of debate.

- **Decline in the number of journalists.**

Despite the press subsidy scheme encouraging permanent contracts for journalists, Luxembourg has seen a decrease in journalists' numbers. According to the Press Council's list, there were 368 journalists in 2024, down from 377 in 2023 (Conseil de presse, 2025). The number of freelance journalists increased slightly from 15 to 19, while the overall number of active journalists decreased by 9.

- **Threats to press freedom.**

In January 2024, Tom Weidig (ADR) threatened Carlo Schneider, a freelance cartoonist for Tageblatt, over a satirical cartoon depicting the confrontation between Minister Léon Gloden and artist Serge Tonnar (Javel & Berthol, 2024).

- **Clear policies for AI in journalism.**

Journalist associations and legislators have started discussing about the usage of AI in journalism. Misch Pautsch, vice-president of the Press Council, mentioned at the 3rd conference of the Mediareform cycle that the Press Council's code of ethics should include ethical and deontological considerations on the use of artificial intelligence in journalistic content (Mediareform (22/10/24)).

The Electronic Media Act of 1991, amended in 2022, stipulates that media authority is a public institution with an independent administrative character. According to Article 35bis of this Act, the Grand Duke appoints the five members of the Board of Directors on the proposal of the government in council for a limited but renewable term of five years. The director is also chosen by the government, but the board has the right to give its opinion before the appointment. The director becomes a civil servant, and the vacancy must be officially advertised. The appointed candidates cannot be members of the government, parliament, Council of State, European Parliament, or municipal bodies. They are also prohibited from holding a post in an entity under ALIA's supervision or having direct or indirect interests in a company or organization falling under ALIA's competence.

As stated last year, we consider that ALIA acts in practice largely independently of external influences and that its decisions list the arguments and legal provisions that support its reasoning. ALIA demonstrates transparency in its actions by publishing reports, decisions, opinions and annual accounts on its website. However, ALIA's independence is contested, since the five members of the Board of Directors are appointed by the government, as is the Director, on the advice of the Board of Directors. In 2024, the nomination procedure of the new director has been contested leading to the departure of its long-standing chairman Thierry Hoscheit in July 2024, with his resignation effective 15 September 2024. According to *Luxemburger Wort*, Thierry Hoscheit's resignation stems from its opposition to the new Minister Delegate for Media and Connectivity, to entrust the process of selecting a successor to current director Paul Lorenz to an external commission headed by the Department of Media, Connectivity and Digital Policy (SMC). Differently from the past selection procedure, the authority could no longer put the post out to tender and decide on its award. It was only invited to interview the candidate selected by the external commission. The external commission brought together representatives from the Ministry of Media, the Ministry of Civil Service, the Luxembourg Institute of Regulation (ILR), the Competition Authority and the Press Council. And at the end of the process the ALIA board of directors was invited on June 7 to give its opinion on only one candidate, the one selected by the external commission. Interviews were held with this candidate on three occasions before ALIA confirmed his candidacy on July 1st. This raises questions about the selection process. According to Thierry Hoscheit, all applications should have been submitted to the Board of Directors for assessment (cf. the 1991 Electronic Media Act). In fact, the law states: "... issues an opinion on the candidates for the post of director". The latter considers that the legality of the procedure could be called into question. In an interview for the *Land* in July 2024, Elisabeth Margue contested this interpretation. She argues that even though the external commission was nominated by the government it acted independently and that the board of the ALIA rejected the invitation of external commission to be associated to the selection process. She also underlines that the change of procedure would contribute to improving the governance of the ALIA by enhancing the director's autonomy relative to the board of directors. Lastly, the Minister emphasized the necessity to enhance leadership within ALIA due to significant personnel management issues in recent years: "The selection committee prioritized leadership qualities. Between 2020 and 2024, more than half of ALIA's staff resigned, with eight out of thirteen people leaving. This is a substantial turnover. We urgently needed someone who could unite the team." The new director of ALIA, Cindy Bauwens, since September 16th 2024, is a lawyer who worked for nine years in the Ministry of Economic Affairs. Although not from the media sector, she was chosen for her management skills.

Issues requiring particular scrutiny :

- **ALIA financial and human resources.**

Despite a budget of €1,529,284 in 2024, the authority still lacks the personnel needed to effectively fulfill its functions. While the number of employees has grown from 5 to 14 in 2024, this workforce remains inadequate given ALIA's extensive responsibilities. ALIA has more than 400 channels under its supervision in different languages. In legal terms supervision does not only mean to respond to external claims, but also implies a role of active surveillance and control of all the media under its authority. The increased human and financial are even more insufficient considering that the regulator is and will be in charge of new tasks: media education, the supervision of the elections, the transposition of the European Media Freedom Act (EMFA).

- **ALIA supervision in electoral period.**

For an efficient supervision of election ALIA supervision should be extended to social media and private linear media. This need was made even more apparent during the recent election campaigns, which were largely played out on social media.

- **Frequencies allocation.**

ALIA is competent only for allocating regional and local frequencies, while all other frequencies are allocated by the government. This means that the government directly takes the most strategic decision regarding the allocation of national and international licenses.

- **Review of penalties.**

The penalties imposed by the Board of Directors appear to be largely inadequate: €25,000 is the maximum fine that ALIA can impose. In its notice 81/2020 of 7 December 2020 on the national transposition of directive SMA, ALIA estimates that the sanctioning power is not effective for large media group. This is the reason why it invites the legislator to introduce a fine of 500-500.000 euro.

- **ALIA's decisions' procedure.**

Unlike other regulatory bodies, ALIA's decisions are made by its board of directors. However, as board members are not full-time civil servants, this arrangement poses risks of conflicts of interest with their other professional activities. Additionally, board members lack the usual protections against political interference and are not subject to the specific obligations associated with civil service status. A concerning issue is the fundamental disagreement between ALIA's permanent staff and its board of directors regarding the interpretation of the legal framework and the authority's powers. This situation demands urgent attention.

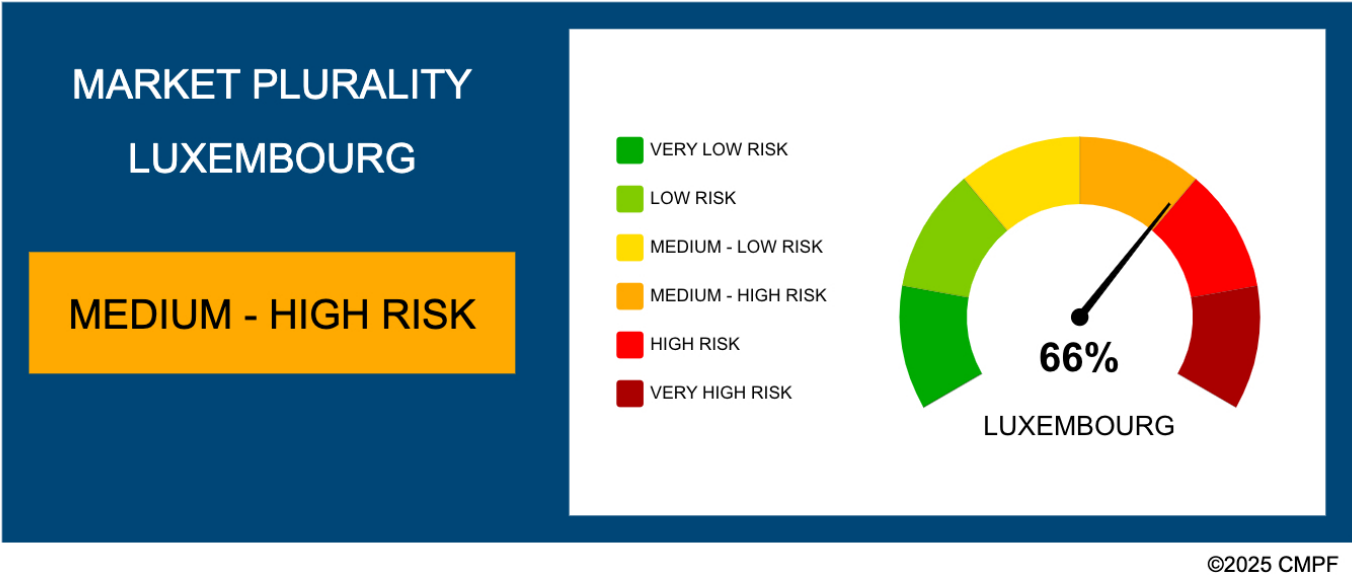
Recommendations for Fundamental Protection

Recommendations for professional associations of journalists and the Press council :

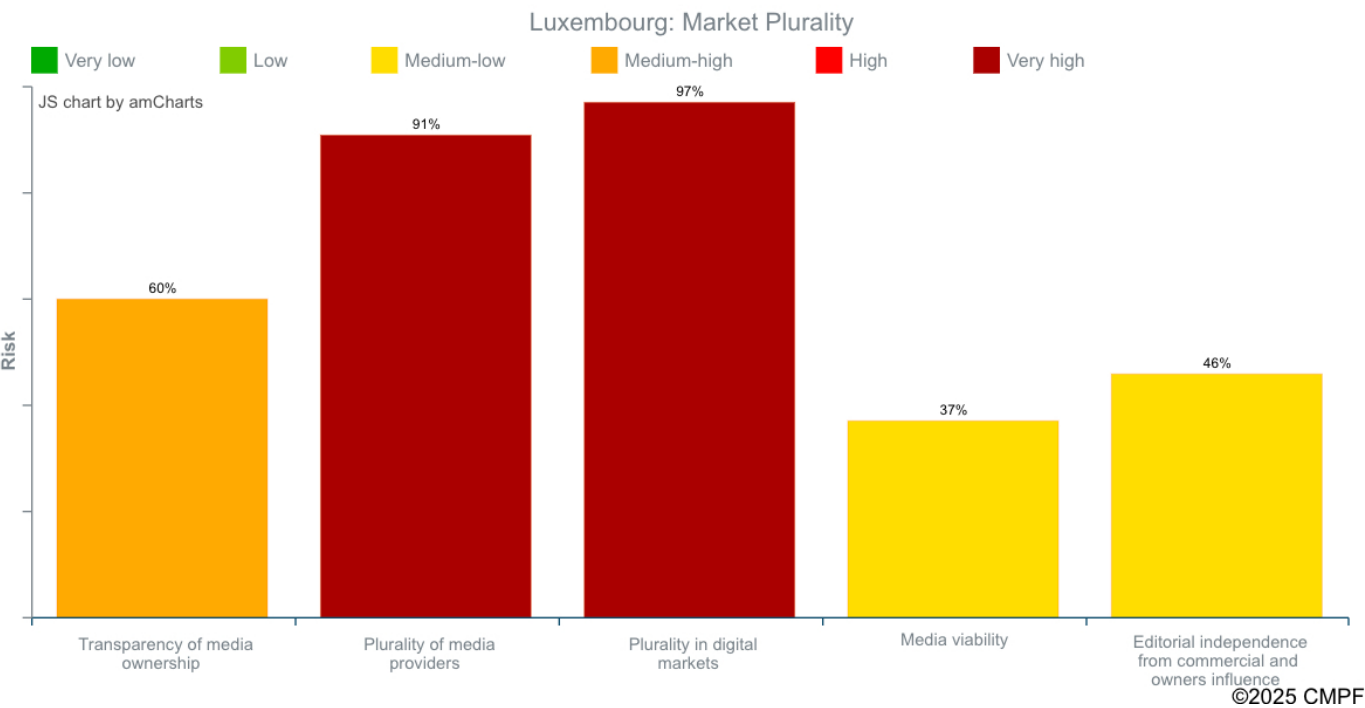
- The European anti-SLAPP directive should be transposed into Luxembourg national law as soon as possible. Such transposition is important to protect public participation, democratic values and fundamental rights, and in particular the protection of journalists.
- ALIA's decision-making procedures should be better protected to avoid any risk of conflicts of interest among board members and disagreements with staff.
- To include independent media experts to strengthen the protection of journalists in Luxembourg in the context of the transposition of the European Media Freedom Act (EMFA), the new law and the new definition of journalists, in order to guarantee editorial independence and/or respect for professional standards. This could take the form of an advisory council, which would provide a better understanding of journalistic practices in Luxembourg.
- To improve their visibility to the general public by strengthening their online presence, particularly via social networks, and by keeping the information on their websites up to date.
- To publish an annual activity report that also informs journalists and the public of their annual income and expenditure.

3.2. Market Plurality

The Market Plurality area considers the economic factors that impact the plurality of media offer, assessing the risks deriving from insufficient transparency and high concentration of media ownership, economic sustainability of the media, and the undue influence of commercial interests and ownership over editorial choices. Moreover, the area assesses the risks deriving from high concentration of digital markets and dependency of the media on online intermediaries.



Market Plurality represents the area at the highest risk level for media pluralism in Luxembourg. The indicators in this area range from medium-low to very high risk. The Luxembourg media landscape continues to be highly concentrated, both offline and online, partly due to the absence of specific limitations to prevent media concentration. The country lacks a national merger control law or similar provisions aimed at limiting horizontal or cross-media concentration of news media. Additionally, the interruption of the biannual Plurimedia survey, which measured media audience share, has further complicated the assessment of media pluralism in the country.



Regarding the **disclosure of media ownership**, national legislation contains restricted provisions requiring the disclosure of ownership details in the media sector. Article 66 of the Freedom of Expression Act of June 8, 2004, limits this obligation to print media and only concerns people directly or indirectly holding more than 25% of the share capital of the legal entity. This information must be published annually in the first edition of the media. The law does not stipulate sanctions if media outlets fail to disclose this information. It is unclear to what extent these legal provisions apply to the online versions of print media. The law on electronic media, which covers audiovisual and online media, does not specifically mandate ownership disclosure obligations. However, it allows for requesting information on the ownership of all forms of electronic media that have a license via the "book of obligations" attached to each license or permit granted by Luxembourg. In practice, the book of obligations requires that the ownership structure and any changes to it be communicated to the State.

Issues requiring particular scrutiny :

- **Disclosure of media ownership.**

Information regarding media ownership is partially disclosed to public bodies and the public. In practice, ALIA (Autorité Luxembourgeoise Indépendante de l'Audiovisuel) and the Ministry of State receive details about media owners. However, this information is neither made public nor easily accessible to the public. While individuals can request access to this information, the requirement to make such a request poses a significant barrier to full public disclosure. In line with the EMFA, it is recommended that the disclosure of all beneficial owners, including shareholders, be mandated to enhance transparency in media ownership. The Euromedia Ownership Report (Lamour, 2023), published in 2023, would benefit from being updated and expanded to provide a more detailed and comprehensive overview of media owners and shareholders in Luxembourg. Such measures would help mitigate potential conflicts of interest and reduce the risk of advertorials being presented as unbiased content.

There are no specific limits on media concentration in Luxembourgish law. However, the law on electronic media of July 1991, as amended in 2013, mentions "pluralism" six times as an important principle for the media. For example, the first article refers to "the right to free and pluralistic broadcasting". Nevertheless, "pluralism" is not defined in terms of measurable thresholds or criteria and does not necessarily prevent a high level of concentration. In fact, media concentration in Luxembourg is high, with three companies clearly dominating the market: RTL for the radio and TV sector; EditPress and Mediahuis for the press sector. This high concentration could be attributed to the very limited market size. There are no provisions in the law governing cross-media ownership of different media outlets. Several major media groups have shares in newspaper media, radio, and/or television. It is worth noting that in the audiovisual sector, CLT-UFA is the dominant player. RTL Télé Lëtzebuerg holds a monopoly in the TV channel market, while RTL Radio

Lëtzebuerg is the dominant radio channel. Furthermore, CLT-UFA owns shares in two major radio stations: L'Essentiel Radio and Eldorado.

The market domination of the CLT-UFA also translates into audience concentration. While we do not have data on usage in general, the Medialux project provides data on the use of media for accessing political news. As expected, RTL (radio, web, or TV) is by far the most widely used medium by the population. In a representative survey conducted a few weeks before the October 2023 national elections, Luxembourg residents were asked about their first source of information to access news (n: 1600). 68% declared that RTL is the first source of information, followed by Lëtzebuerg Wort (print and online - 17%) and the public service media radio 100.7 (radio and online - 4.5%). The same question was asked to the candidates (n: 160), for whom we observed a weaker concentration of usage. In detail, a majority mentioned RTL as the first source of information (52%), but the public service radio 100.7 arrived second (22.5%) and the Wort only third (12.5%).

Issues requiring particular scrutiny

- **Concentration regulation in media sector.**

There is no national regulation regarding concentration in the media sector, including digital media. Consequently, there is no separate assessment of the impact of media market concentration on media pluralism. With the application of the EMFA within the media reform plan, we expect that Luxembourg will introduce separate assessment procedure on mergers to evaluate the impact of the concentrations in the media market on media pluralism and editorial independence (the so-called "media plurality test", introduced by Article 22 EU Regulation (EU) 2024/1083 (European Media Freedom Act - EMFA).

- **Lack of data on market share, and audience concentration.**

In the absence of reliable data in relation to the media revenues and market share it is not possible to assess the evolution of media concentration in Luxembourg. As this information is crucial to assess the national media landscape, such data should be supervised by an independent institution and made publicly accessible.

PLURALITY IN DIGITAL MARKETS

VERY HIGH RISK

The law of 30 November 2022, as amended on 29 March 2023, concerning competition, equips the Luxembourg Competition Authority with the necessary tools to enforce competition rules more effectively, thereby contributing to the proper functioning of the internal market. This legislation also transposes European Directive 2019/1 of the European Parliament and of the Council into Luxembourg law, ensuring Luxembourg's compliance with its European obligations. Under this law, the Competition Council—previously an independent administrative authority—has been restructured into a public institution known as the "Competition Authority of the Grand Duchy of Luxembourg." This transformation was undertaken primarily to meet the independence requirements set forth by the European directive. Beyond its existing responsibilities in enforcing competition rules, the law expands the Authority's powers to include

new areas relevant to businesses, particularly the relationships between online platforms and their professional users. As the designated coordinator for digital services, the Competition Authority will oversee compliance with obligations imposed on providers of intermediary services established in Luxembourg that fall under the scope of the Digital Services Act (DSA) and the Digital Markets Act (DMA). It is worth noting that Luxembourg does not operate a system of prior merger control.

Issues requiring particular scrutiny :

- **Digital Intermediaries and media providers in Luxembourg.**

There is no specific information about financial agreements between digital intermediaries and media providers in Luxembourg to remunerate media providers for the use of copyright-protected content or to contribute to their financing. The Luxembourg market, being very small, is not a priority for online intermediaries.

- **Copyright and Generative AI.**

There are no specific financial agreements between generative AI providers and media providers to remunerate rights holders for the use of copyright-protected content. The Act transposing Directive 2019/790 on copyright was passed on March 30, 2022, and modernizes certain aspects of the legal framework for copyright and related rights to account for technological advances in digitization and new distribution channels for protected content, such as digital platforms. However, there is a time limit to these rights. They will only exist for two years after the publication of the article, bearing in mind that the protection period is calculated from January 1 of the calendar year following publication. Even if Directive 2019/790 does not directly apply to AI-generated content, it influences its legal framework through its provisions on data mining and the responsibilities of platforms.

- **Online platform concentration data.**

There is a lack of data about online platform concentration. The only audience data is provided by the Belgian company CIM, which also measures the audience of certain Luxembourgish news websites. The data are collected for one randomly selected day in December (December 27, 2023) and look at unique browsers during this single day. It is important to note that the available data do not include news aggregators and digital intermediaries. As this information is crucial to assess the national media landscape, such data should be supervised by an independent institution and made publicly accessible.

MEDIA VIABILITY

MEDIUM - LOW RISK

To protect and promote media pluralism, the state supports various media outlets through bilateral conventions, such as with RTL or Radio ARA, or via public funding schemes established by law. The Law of 30 July 2021 on aid for professional journalism defines three funding schemes for the press, including online media. The primary aid scheme, “maintien du pluralisme”, calculates support based on the number of professional journalists employed in editorial offices, replacing the previous system based on the number of

pages published. In 2024, this scheme supported 16 publications^[3]. The second scheme, “promotion of pluralisme”, provides funding to emerging publications for up to three years. In 2024, this scheme benefited three publications: *Femmes Magazine*, *Chronique.lu*, and *lesfrontaliers.lu*. The third scheme, the media and education aid scheme, was awarded in 2024 to a single publication: *Forum*

To assess the impact of the law, the Service des médias, de la connectivité et de la politique numérique (SMC) has set up a digital form allowing current beneficiaries to share their experiences three years after the new system came into force and to suggest necessary adjustments. A total of 14 stakeholders responded to all or part of the questionnaire. The SMC also consulted the Press Council, the Luxembourg Association of Professional Journalists (ALJP), the Luxembourg Association of News Media (ALMI), and the Advisory Commission to the Minister for the Media for the allocation of press subsidies. Overall, the process is considered positive^[4] for editorial development and economic viability. The majority, however, responded that it has not contributed to increasing their readership.

In terms of initiatives that promote media sustainability, media organizations are innovating by developing alternative sources of income. Several media companies use alternative financing methods beyond traditional revenue streams such as sales and advertising. For example: RTL offers media production and broadcasting services through its subsidiary BCE. Some daily newspapers have integrated paywalls (freemium model) into their online versions. Reporter.lu is a crowdfunding initiative. The communist newspaper Zeitung vum Lëtzebuerger Vollek organizes fundraising festivals. Maison Moderne is financed through a business club with high membership fees. Radio ARA collaborates with the Ministry of Education to promote media literacy. Journal.lu collaborates with the National Research Fund to organize podcasts related to research in Luxembourg.

Issues requiring particular scrutiny :

- **Reform of Press aid schemes.**

Following the consultation several modifications were included in the draft law on promotion of professional journalism and democratic debate, presented before the Parliament on July 24, 2024^[5]. The first is to delete the time frame limit for benefiting from the aid scheme “promotion of pluralism”, which corresponds to 100.000 euro per year. The original text limits the allocation of aid under the Promotion of Pluralism scheme to three consecutive years, with the aim of allowing beneficiaries to meet the eligibility criteria for the “Maintaining Pluralism” scheme after this period. However, it appears that the three-year period is not sufficient to develop the publication to be eligible for the “Maintaining Pluralism” scheme. The legislator therefore has decided to remove the time limit and allow eligible publishers to benefit from the “Promotion of Pluralism” scheme in the long term. In 2024, three publications benefit from this aid scheme (Chronic.lu; Femmes magazine; les frontaliers.lu). The second is the introduction of a “de minimis” scheme that opens the way to the allocation of aid of up to €300,000 per single company over three consecutive years to a publisher “that carries out a project that adds value to media pluralism in the country”. In other words, this new aid scheme complements the current aid schemes, namely the maintenance of pluralism scheme, the promotion of pluralism scheme, and the media and citizenship education scheme, by providing the possibility to support innovative projects contributing to media pluralism which are not limited to the written format. It remains to be seen if this new measure will encourage the emergence of new and diverse projects.

- **Introduction of a listener committee within the PSM.**

The public service media radio 100.7 has established a listeners' committee, marking the first time a media organization in Luxembourg has had such a participatory advisory committee. The role of this 12-member committee is to provide the 100.7 team with informed and critical feedback on radio programs. Members were appointed by the board of directors following a public call for applications, ensuring a diverse composition in terms of age, gender, region, and socio-professional background, as well as a mix of loyal and occasional listeners. The foundations for an audience council were laid by the law of 22 August 2022 on the public service media 100.7. The council meets at least twice a year, and from 2026, one-third of the public council will be renewed annually.

**EDITORIAL INDEPENDENCE FROM
COMMERCIAL AND OWNERS INFLUENCE**

MEDIUM - LOW RISK

The Medialux survey, conducted just before the October 2023 election, reveals that 36% of the population “rather” or “fully” trust that journalists are independent from economic pressure. In contrast, more than one-quarter (26.5%) believe that journalists are “not at all” or “rather not” independent from such pressures, while 37% position themselves in the middle. Skepticism is particularly pronounced among radical voters (déli Lénk and ADR), as well as among non-voters and those who cast blank ballots. This pronounced skepticism vis-a-vis journalist exists in a context where several legislations are in place aiming at limiting this influence. Article 10 (d-1) of the internal regulations of the press council explicitly emphasises that a journalist is not authorised to carry out commercial activities or to be involved in the advertising sector. Article 11 of the code of ethics of the press council adds that the press must be independent of any commercial interest: advertising must be presented in such a way that it cannot be confused with editorial content; journalists undertake not to sign advertising articles; if the press makes investment recommendations, it must only provide recommendations that comply with the law; and journalists undertake not to use the financial information that is to be published for their own benefit. Furthermore, Article 6 of the Journalists' Code of Ethics states that the work of a journalist involves the rejection of all forms of venality and the pursuit of the sole objective of providing information and shaping public opinion. In addition, journalists and editors-in-chief must not accept any advantage or promise that could limit their independence and the expression of their own opinion. The press must not give in to any direct or indirect pressure or any promises in relation to its information. Finally, Article 10 (d-1) of the internal regulations of the press council emphasises the fact that a journalist is not authorised to carry out commercial activities or to be involved in the advertising sector.

Issues requiring particular scrutiny :

- **Suspensions of commercial influence.**

While Luxembourg's professional media should be independent of commercial influence, the MPM's interviews and expert opinions reveal cases of such influence on media editorial content. Suspicious cases are particularly prevalent in press organizations heavily dependent on advertising, such as specialized media. A current problem in Luxembourg is the lack of precise knowledge about beneficial owners and shareholders of media companies. The 2023 report of the Euromedia Ownership Monitor (Lamour, 2023) is not explicit enough to measure the economic interests of media owners. For example, while we know

Mediahuis is linked to De Eik and Midelco (holding company activities), we lack further details. Such information is necessary to assess potential conflicts of interest within the media. Without comprehensive knowledge of all shareholders, the owners of the country's main media outlets may have undisclosed interests, relationships, or activities in non-media companies. For instance, RTL's parent company Bertelsmann's Chairman and CEO, Thomas Rabe, has previously been associated with various economic interests, including Cedel International, Deutsche Börse Clearing, Clearstream (bank), the music and publishing markets (Penguin Books), Symrise (perfumes), and he currently serves as Vice-Chairman of the Supervisory Board of Adidas.

- **Complaints on commercial influence.**

Several complaints regarding commercial influence have been filed with ALIA (Autorité luxembourgeoise indépendante de l'audiovisuel). In October 2024, a complaint was filed concerning the publication of sponsored articles on www.rtl.lu. ALIA rejected this complaint, deeming it manifestly unfounded and stating that the provider had not violated applicable provisions on commercial communications. On February 12, 2024, the association Richtung22 a.s.b.l. filed a complaint against CLT-UFA S.A. regarding a commercial communication on www.rtl.lu and RTL Radio Lëtzebuerg. This complaint was declared inadmissible due to the expiration of the limitation period, as the alleged facts dated back more than a year, with the last update on July 21, 2020.

- **High proportion of advertisements in media outlets.**

It is also worth noting that the high level of advertising relative to journalistic content in some media is questionable. Beyond economic interests, this raises concerns about prioritizing advertising content over journalistic information, which can be detrimental to news quality and integrity.

Recommendations for Market Plurality

Recommendations for media and government :

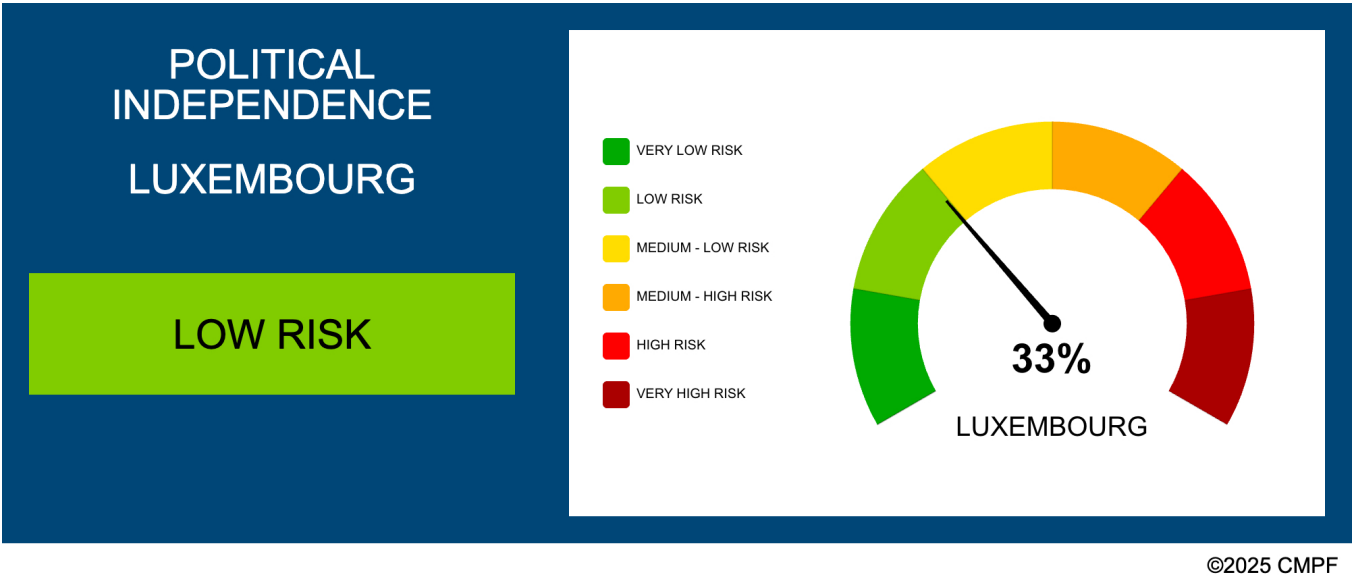
- **Media concentration and economic independence of media** are significant concerns for the population, as highlighted by surveys like Medialux. Existing measures to mitigate these issues appear insufficient, prompting calls for stronger regulations. In line with the European Media Freedom Act (EMFA), it is proposed that measures be taken to oversee and mitigate the media concentration.
- This includes disclosing ultimate ownership information of media outlets, providing comparable data on market and audience shares, and introducing more stringent measures to limit media concentration. Such actions are crucial to safeguard **media pluralism and editorial independence**, which are essential for democracy but are increasingly threatened by the growing power of platforms and media conglomerates.

Recommendations to stakeholders of AI (including government, public bodies, journalists and authors) in Luxembourg :

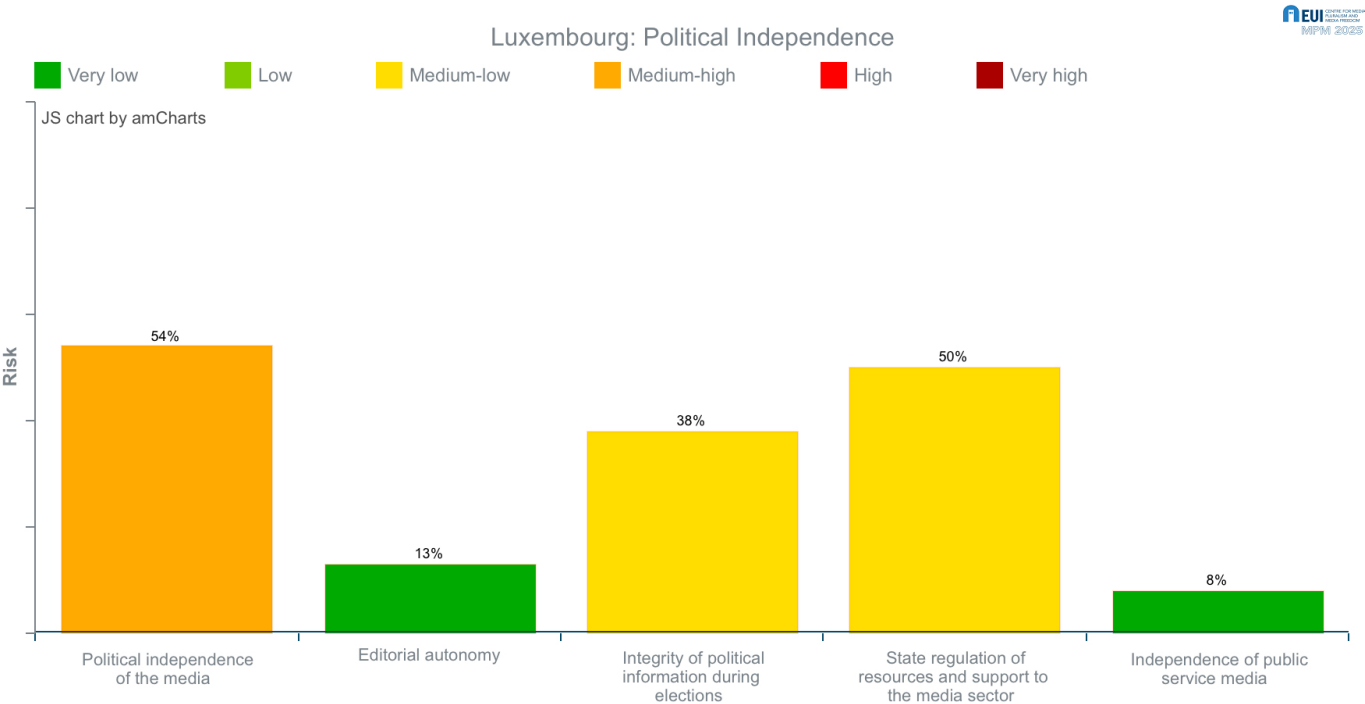
- To improve its visibility and appear in the results generated by artificial intelligence, Luxembourg could take inspiration from Iceland and provide Luxembourg content free of charge, thus avoiding the homogenisation of information by the majority languages that feed artificial intelligence services.

3.3. Political Independence

The Political Independence indicators assess the existence and effectiveness of regulatory and self-regulatory safeguards against political bias and political influences over news production, distribution and access. More specifically, the area seeks to evaluate the influence of the State and of political power over the functioning of the media market and the independence of the public service media. Furthermore, the area is concerned with the existence and effectiveness of (self)regulation in ensuring editorial independence and the availability of plural political information and viewpoints, in particular during electoral periods.



Political independence represents a low risk for media pluralism in Luxembourg. In detail, **Editorial autonomy and independence of public service media** show a very low risk. **Integrity of Political information during elections** and **State regulation of resources and support to the media sector** score medium-low risk. **Political independence of the media**, however, falls into the medium-high risk band.



The law does not regulate conflicts of interest deriving from governmental actors concomitantly owning media, nor it limits direct and indirect political control in general. Historically, print media have always maintained close ties with political parties or interest groups. However, the press has increasingly emancipated itself from partisan influence. Similarly, the digital native media (such as reporter.lu, or Lesfrontaliers.lu) are rather independent from political influence. The national audiovisual sector (i.e., television), which consists mainly of RTL (RTL Télé Lëtzebuerg), is considered relatively independent from political influence in practice, as its programming is defined by its public service missions and commercial logic. It should be noted, however, that due to RTL's national strategic importance, the appointment of the board of directors of CLT-UFA (a subsidiary of the RTL Group, which controls RTL Télé Lëtzebuerg) is partly defined by political considerations. Under the concession contract, CLT-UFA shareholders must appoint the 20 members of the board of directors. Of these, the chairman and three members must be approved by the government, have Luxembourg nationality, and reside in the Grand Duchy.^[6] Although there has been no specification of required characteristics (except for nationality and residence), shareholders have traditionally appointed members from the three main political groups in the Chamber of Deputies. Experts have different views on the potential influence of the presence of different parties on the board (one of which is in opposition).

Nevertheless, there are mitigations measures in place. RTL operates under the supervision of ALIA and a monitoring committee composed of members appointed by the government and one member appointed by parliament. The committee's role is to monitor compliance with the public service agreement signed with the State in June 2022, which runs from January 1, 2024, to December 31, 2030. Notably, the MP appointed to represent Parliament is Tom Weidig from ADR, the party that has complained the most about RTL's coverage of them. This body should ensure that RTL Luxembourg fulfills its public service mission and remains independent of political influence (see agreement). Additionally, an internal rule prohibits journalists engaged in partisan politics from continuing to work for RTL.

Issues requiring particular scrutiny :

- **Municipal channels.**

In its 2018 report, ALIA observed that the 1991 Electronic Media Act "makes no mention of a concession or authorization with regard to municipal channels, although they are becoming increasingly important in the public and political life of municipalities." As a result, the regulator does not have the necessary instruments to ensure that these programmes do not become a propaganda tool for the majority in power in general and during election campaigns in particular. Furthermore, in the event of a complaint, the regulator is not always in a position to identify the editorial manager from whom it could request explanations or impose a penalty. Based on a questionnaire sent to all municipalities, the regulator estimates that there were 8 municipal channels. As pointed out by the regulator and reporter.lu in the context of the local elections in June 2023, this problem persists even after being raised by the regulator in 2019.

- **RTL Monitoring Commission.**

As RTL (TV, radio, and internet) is the primary source of news information for most of the population, the establishment of a monitoring commission to oversee compliance with its public service media (PSM) missions is highly welcomed and requires scrutiny. This commission has been officially active since January 1, 2024, and comprises the government commissioner, a member appointed by the Chamber of Deputies, and individuals directly appointed by the Minister responsible for media. The commission fulfills several key functions: 1) It oversees the annual accounts related to the financing of public service missions; 2) It annually verifies RTL's commitments within the framework of these public service missions; 3) It evaluates the measures implemented by RTL to ensure the quality of its programming. In this context, the commission may periodically conduct studies on the quality of public service content financed by the State, which RTL is required to address. The commission meets at least twice a year and serves in an advisory and consultative capacity to the Minister responsible for media. If it identifies serious and repeated breaches of the convention, it reports them to the Minister. If such breaches cannot be resolved or rectified, the State may impose penalties, including a reduction in financial support provided to RTL. Even though the functions of the RTL Monitoring Commission are crucial for both the public and media accountability, its deliberations, decisions, and study reports are not publicly available for scrutiny. On February 29, 2024, the Department of Media, Connectivity, and Digital Policy of the Ministry of State submitted a request for an opinion to the Commission for Access to Documents (CAD) regarding whether these documents could be made public. On March 7, 2024, CAD issued a unanimous opinion^[7] stating that these documents are not communicable because they relate to control, inspection, and regulatory missions covered by the Law of September 14, 2018, concerning transparent and open administration^[8].

EDITORIAL AUTONOMY

VERY LOW RISK

The protection of professional standards in Luxembourg is attributed to the Press Council (Conseil de presse), a public law body. It is composed of journalists (50%) and representatives of media companies (50%) designated by ALJP (Association Luxembourgeoise des Journalistes Professionnels) and ALMI (Association Luxembourgeoise des Medias d'information) respectively, making it an internal rather than an external regulatory body. The Press Council adopted in 2006 a code of deontology, replacing an earlier version from 1995. The Press Council serves as the guardian of the code of ethics for professional journalists. When a press card is issued, each professional journalist receives a bound copy of the press code and the code of ethics. Each journalist must acknowledge receipt of these documents by signing them. Members of the public can introduce complaints regarding press articles or other media reports to the Press Council. These complaints are handled by a "Commission des plaintes", presided by an independent jurist. In parallel major news outlets also have internal safeguards to prevent political influence through the editorial lines (that are required to be written out and published at least once a year) and for some media internal rules. RTL does have an internal ethics code in addition to the one of the press code. Média de service public 100,7 has an obligation by law to set up an editorial status covering this question^[9].

The Luxembourg Association of Professional Journalists (ALJP) is also involved in the defense of the journalist interest and the respect of professional standards. It is composed of professional journalists (salaried or freelance) recognized by the Press Council or by an equivalent foreign institution. The third

association that plays a role in the protection of the journalist standards and interests is the "Luxembourg Association of News Media" (ALMI) that in July 2020, replaced the national association of newspaper editors.

The press council determines since 2016 the representatives of the publishers by the number of press cards by publisher (cf règlement d'ordre intérieur of the press council). As a result of this procedure, big and small publishers (employing 85% of the professional journalists in Luxembourg) are represented in the press council. These publishers are then eligible to be a member of ALMI (www.almi.lu). It brings together the 12 publishers represented on the press council. A major "raison d'être" of ALMI is the international representation of Luxembourg (f.ex. WAN-IFRA).

The Medialux survey, conducted just before the October 2023 election, might provide at least some indication on the effectiveness of self-regulation. It revealed that 33.5% of the population "rather" or "fully" trust that journalists are independent from political pressure. In contrast, almost than one-third (30.5%) believes that journalists are "not at all" or "rather not" independent from such pressures, while 36% position themselves in the middle. Skepticism is particularly pronounced among radical voters (déi Lénk and ADR), as well as among non-voters and those who cast blank ballots.

Issues requiring particular scrutiny :

- **RTL's Ethics Committee.**

In accordance with the RTL Luxembourg Journalists' Charter, CLT-UFA has established an Ethics Committee. This committee comprises content managers (news and non-news) from RTL Luxembourg as well as one or more members of the editorial teams. The Ethics Committee ensures ongoing self-monitoring of content that may be considered critical by the editorial teams. The committee will meet regularly to examine content in relation to the specifications and the RTL Luxembourg Journalists' Charter. Any member of the editorial staff can approach the Ethics Committee in the course of their daily work. While it has no decision-making power, the committee is responsible for providing opinions. After each meeting, a report is sent to the CEO of RTL Luxembourg and to the government commissioner.

- **Professionalisation of journalist associations.**

The Press Council is a body that relies on the voluntary work of its members. Consequently, it cannot efficiently and proactively oversee and ensure adherence to professional standards. A greater professionalization of the Press Council appears to be necessary.

INTEGRITY OF POLITICAL INFORMATION DURING ELECTIONS

MEDIUM - LOW RISK

The Integrity of political information during election periods is only partially regulated through the law of June 29, 2023 amending the amended electoral law (see MPM 2023) that attributes to the independent national media authority ALIA the supervision of political campaigning during election periods on radio 100.7 and RTL, as well as the supervision of political news broadcasts outside the election period, which are

broadcast at the request of the government (in French: Tribunes Libres). ALIA guarantees a high degree of transparency by making available to the public on its website the various electoral arrangements, the plans for broadcasting electoral spots, the distribution of parties on the official round tables of the RTL Radio and Télé Lëtzebuerg services (for public service missions) set up during the 5 weeks of the European legislative campaign. The guidelines for the European elections on June 9 2024 have also been published on the ALIA website. While in 2023 some complaints were filed with ALIA regarding the local and national elections (see MPM 2024), no complaints were filed for the 2024 European elections.

Issues requiring particular scrutiny:

- **Extension of electoral supervision.**

The electoral supervision by ALIA of the official campaign on PSM is a progress, but it is not sufficient to guarantee the organization of fair elections. As pointed out by ALIA it should also cover the other media that are active in the campaign. It should supervise the private radio, the social media, as well as television channels that are not under its supervision. These are private media – such as .dok TV (now closed since december 2023), Apart TV, Uelzechtkanal, Nordlicht - and municipal channels– such as Dikrich TV, Esch TV, Petange, Mersch, Dudelange, Differdange, Berdorf, Mamer TV. .

- **Transparency in Political Advertising.**

While paid political advertisement are considered as commercial adds and must be “easily recognizable as such” according to article 27bis of the media law of 1991, there is a lack of transparency regarding spending and techniques used for political advertising in all the media formats (print, audio-visual and online). During the last elections, political parties agreed not to spend more than 100,000 euros per campaign. However, it was not possible to verify whether this gentleman agreement was respected. With regards to digital platforms, it remains to be seen whether the role of the Digital Services Coordinator (DSC), acting as the competition authority, will provide more data on this issue in the future as stated in the DSA

STATE REGULATION OF RESOURCES AND SUPPORT TO THE MEDIA SECTOR

MEDIUM - LOW RISK

The legislation provides fair and transparent rules on spectrum allocation. The Grand-Ducal regulation of 28 July 2014 which establishes the list of Luxembourg broadcasting frequencies referred to in article 4 of the amended law of 27 July 1991 on electronic media. This regulation defines the rules according to which frequency allocation concessions are granted. Additionally, the amended law of 30 May 2005 on the organisation of radio spectrum management encompasses various sectoral frequencies. In accordance with the law of 27 July 1991, the Authority (ALIA) oversees the authorisations for regional radio stations (with transmission networks) and local radio stations. Other frequency allocations - for national and international broadcasting, for both radio and television - are granted by the government through grand-ducal regulation after consultation with the Authority (ALIA). The general rule, as defined in Article 3(2), stipulates that whenever new frequencies become available, "concessions or authorisations shall be granted after publication of a public call".

The legislation also provides fair and transparent rules for direct subsidies for the written online and offline press (Law of 30 July 2021 on an aid scheme for professional journalism) and for the public service media radio 100.7 (Law of July 13, 2022, on the organization of the public establishment "Public service media 100.7"). The other funding mechanisms are organized through public conventions. In May 2022, the convention between the State and CLT-UFA and RTL was approved for a maximum amount of 15 million euros annually from 2024 to 2030. The convention provides a direct subsidy to RTL Lëtzebuerg to produce a public service TV and radio programs and, since 2022, to the online platform (see MPM 2024). As far as radio is concerned, the community radio station ARA benefits from a multi-year agreement (2021-2025) which grants it a support package of 1,200,000 euros, including 250,000 euros in 2024 and 250,000 euros in 2025.

Issues requiring particular scrutiny:

- **New frequency allocations via DAB+ technology.**

In July 2024, the Electronic Media Act 1991 was amended to include new frequency allocations via DAB+ technology. In November 2024, following a public call for applications, the Minister responsible for Radiocommunications and Radio Spectrum Management selected Broadcasting Center Europe (BCE) as the successful candidate for the license to operate DAB+ broadcasting and to establish and manage the first multiplex. At the same time, SMC is working on the concept for the second digital multiplex for local radio stations. In this context, the Minister Delegate to the Prime Minister, responsible for Media and Connectivity, Elisabeth Margue, met representatives of the Daachverband Lëtzebuenger Lokalradioën (DLLR) on 12 November 2024. The purpose of the meeting was to discuss the specific needs of local radio stations and the practical arrangements for their transition to the digital multiplex. Close scrutiny is needed on whether the attribution of these new broadcasting channels will contribute to reinforce the plurality of the radio.

- **Absence of legislation on the distribution of state advertising.**

The current legislation does not provide fair and transparent rules for the allocation of state advertising to media outlets, as required by the European Media Freedom Act (EMFA). The only available data comes from a response to a parliamentary question posed by Pirate Party MP Marc Goergen^[10]. These data outline the expenditures on official notices by various state ministries from 2014 to 2021 for the largest print media outlets. They reveal significant disparities in allocations among different media outlets, with total amounts varying year by year. Furthermore, there is a lack of data for several relevant media outlets, such as *L'essentiel*, RTL, and weekly newspapers like *Télécran* and *Revue*. The Ministry of State claims it does not have access to these data because they are not communicated to them.

INDEPENDENCE OF PUBLIC SERVICE MEDIA

VERY LOW RISK

The only public service media in Luxembourg is Radio 100.7, while RTL luxembourg is a private media outlet with public service missions. The independence of radio 100.7 vis-à-vis the government and any other political influence was reinforced and legally sanctioned by the adoption of the law of 2022 organizing the

public establishment "Public service media 100.7" ((Law of July 13, 2022, on the organization of the public establishment "Public service media 100.7")) and by the pluriannual convention signed in 2023 which ensures sufficient income until 2030 (Gouvernement du Grand-Duché de Luxembourg, 2023).

The independence of the editorial line is guaranteed in article 6 of the new law. Art.6 states among others that "Programs and content are developed with complete editorial independence" and that "the rules and principles governing compliance with the principle of independence and the day-to-day implementation of the public service mission are determined by an editorial statute approved by the Board of Directors on the joint proposal of the director and the editor-in-chief." A major improvement of the new law concerns the new procedure for appointing the board of directors. Among the nine members of the board, the six representing civil society are no longer chosen by the government, but by the members of the council itself. The new law specifies that the new members of the board are chosen from among personalities representative of social and cultural life and justifying the skills necessary for the effective exercise of their mandate (art.10(1)). And that the board may resort to a public call to fill an open position in the board (s.10(4)). The other three members – and the government commissioner who does not have the right to vote – represent the government and are chosen by it. The board hires and dismisses the director (art.8(3)1°) and hires and dismisses, on the proposal of the director, the employees occupying strategic positions of responsibility (such as the editor-in-chief) who are fixed by decision internal.

With regards to the financial autonomy, the pluriannual convention grants the radio a budget of nearly 79 million euros for the next seven years, providing greater predictability for its future. The budget, which is increased by more than 25% for 2024, should not only enable Radio 100.7 to provide public service broadcasting in Luxembourg under good conditions, but also to continue developing its online offering and remain at the forefront of technological innovation. Radio 100.7's commitments in this agreement include: addressing topics related to the natural and human environment and climate crisis challenges with complete editorial independence, developing new journalistic formats, particularly original long-form podcasts, creating a radio station dedicated to classical music, expanding audio content for children and young people, promoting gender balance in content, ensuring maximum online accessibility for people with sensory impairments.

Issues requiring particular scrutiny:

- **Call for Public Service Television.**

The artists' collective *Richtung 22*, which launched the RTL website to parody RTL and offer an alternative perspective on news media, emphasizes the need for a debate on creating a public service television channel. They argue that Luxembourg requires a genuine public television channel that prioritizes educating the population over commercial and sensationalist audience-driven choices, enabling citizens to be responsible and critical.

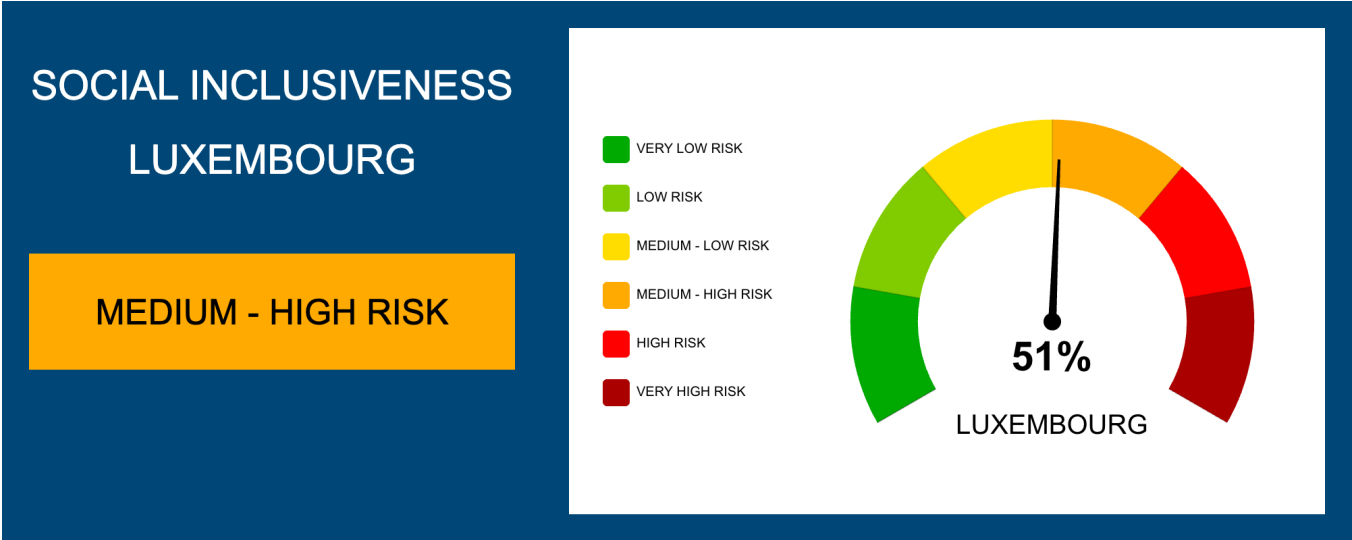
Recommendations for Political Independence

Recommendations to public service media, media with public service missions and government :

- To strengthen political independence in Luxembourg, more transparency is needed. Indeed, the public service media and media with a public service missions could be more transparent in order to improve public confidence. It should be noted that a first step towards reconnecting with the public has already been taken, since Radio 100,7, the public service broadcaster, is required to establish a listeners' council comprising members of the public. It must also implement an internal mechanism to handle public feedback on its programming and content. This agreement aligns with the EMFA's emphasis on the independence and stable funding of public service media. The multi-annual financing program results from negotiations between the radio (represented by its director and president) and the government, based on a project defined by the director. However, these negotiations could benefit from increased transparency. To improve transparency and align more closely with EMFA principles, the funding procedures should be based on transparent and objective criteria laid down in advance. This would ensure that Radio 100,7 has adequate, sustainable, and predictable financial resources corresponding to its public service remit while safeguarding its editorial independence.

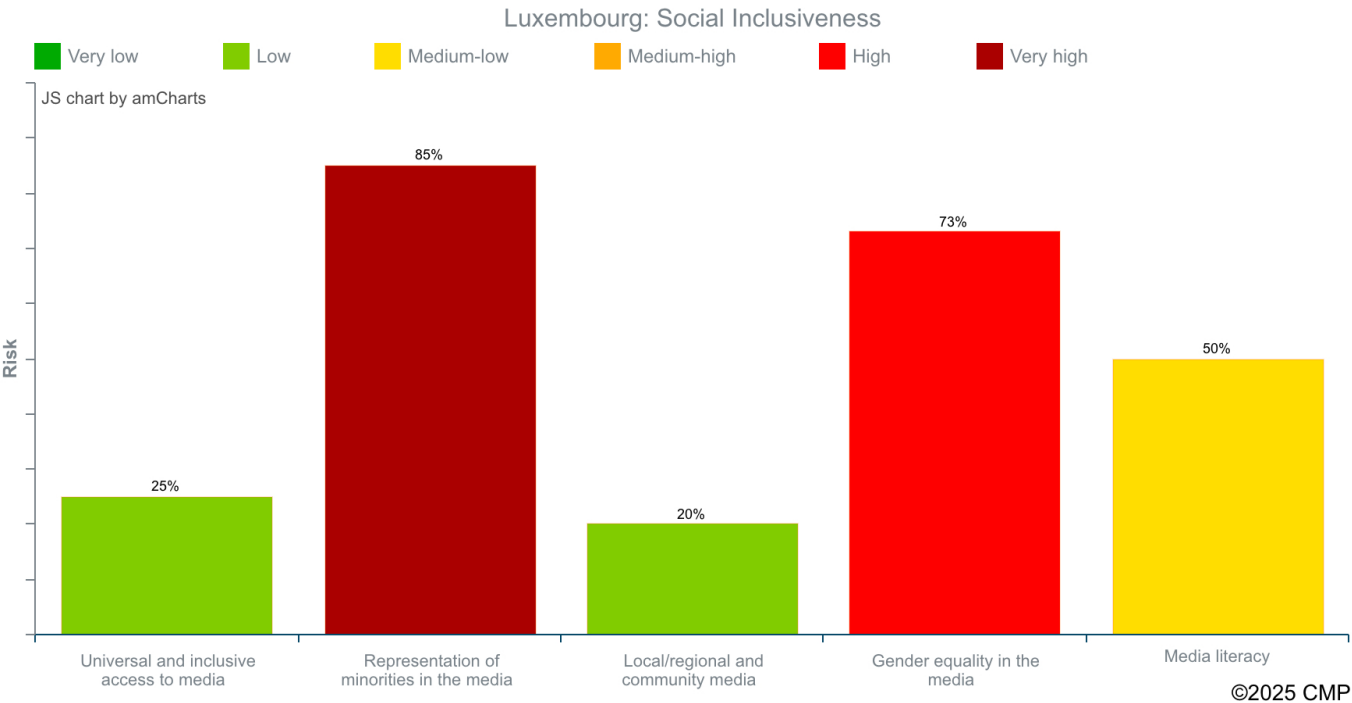
3.4. Social Inclusiveness

The Social Inclusiveness area focuses on the universal, inclusive and safe access to media, especially by specific groups in society: minorities, marginalised communities, local and regional communities, women and people with disabilities. It also examines media literacy environment, as a precondition to inclusiveness.



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Social inclusiveness constitutes a medium-high risk. The main indicators range from low risk to very high risk. **Universal and inclusive access to media** and **Local/regional and community media** are assessed as low risk. **Media literacy** presents a medium-low risk. **Gender equality in the media** is a high risk, while the **Representation of minorities** in the media is at very high risk.



UNIVERSAL AND INCLUSIVE ACCESS TO MEDIA

LOW RISK

Regulatory safeguards regarding net neutrality are implemented in Luxembourg in accordance with Regulation (EU) 2015/2120 laying down measures relating to open access to the internet (ILR, 2024). The Luxembourgish Institute for Regulation (ILR) is responsible for ensuring that operators comply with this regulation (*Ibidem*). The Body of European Regulators for Electronic Communications (BEREC) has published guidelines since 2016 to assist national regulators in implementing the EU regulation on open Internet access (ILR, 2016). The ‘open internet’ regulation is implemented in Luxembourg under the supervision of the ILR. This regulation has enabled Luxembourg users to access an open internet while guaranteeing freedom of innovation and user protection. There is no obligation (in law or in conventions) for universal coverage of public service media. Nevertheless, after receiving a second radio frequency in July 2017, the national public service radio (Radio 100.7) reached almost universal coverage. As far as internet coverage is concerned, 99% of the households have access to the Internet and 97% have a mobile broadband connection (Eurostat, 2023 ; DESI indicator, 2024).

Issues requiring particular scrutiny

- **Accessibility for People with Disabilities**

Existing measures to ensure access to services for people with disabilities are insufficient. Luxembourg has ratified the United Nations Convention on the Rights of Persons with Disabilities (Organisation des Nations Unies, 2006; Ministère de la famille, des solidarités et du vivre ensemble et de l'accueil, 2024), but there is no specific law implementing this convention to promote media accessibility for persons with disabilities. Instead, the government has implemented the agreement through various action plans, with the ongoing plan covering 2019–2024 (Ministère de la famille, 2020), and including limited, non-binding measures. The State encourages media outlets to make their services accessible by introducing features like audio transcription, sign language. The Independent Luxembourg Audiovisual Authority (ALIA) supports this effort as part of its missions (ALIA, 2023) . Additionally, the Law of 30 July 2021 requires publishers receiving financial support to report annually on measures taken to improve accessibility (Loi du 30 juillet 2021 relative à un régime d'aides en faveur du journalisme professionnel, 2021). The PSM 100.7 and RTL have limited obligations. For radio 100.7, the website should provide the greatest possible accessibility for people with sensory disabilities, according to the standards defined by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C). As regards to RTL, it is requested that it elaborates a continuous and progressive “action plan” to improve TV accessibility (Data public, convention CLT-UFA, 2024), . Globally, these measures are primarily voluntary and lack sufficient coordination, relying heavily on the goodwill of media outlets.

REPRESENTATION OF MINORITIES IN THE MEDIA

VERY HIGH RISK

There are no legally recognized minorities in Luxembourg but the linguistic situation is highly complex and unique, characterized by the use and recognition of three official languages (also referred to as administrative languages): French, German, and the national language, Luxembourgish, which was established by law in 1984 (Loi du 24 février 1984 sur le régime des langues, 1984). Many other languages

are spoken, in particular Portuguese (the largest foreign community) and English (essentially spoken by employees of financial institutions and international organizations). While there are several commercial radio channels targeting this multilingual public (e.g. L'essentiel for the French-speaking community, Radio Latina for the Portuguese-speaking community or Radio ARA for the French, English, Arabic and Italian-speaking communities), the PSM (i.e. Radio 100,7) and RTL - the main commercial radio and television company, that has public service missions - broadcast mainly in Luxembourgish. RTL as however, extended its online multilingual offer by creating an English Radio (RTL Today) and a French and English website (RTL infos and RTL Today).

Despite its reputation as a stable and well-integrated country, and despite numerous initiatives from civil society and the state to integrate and protect marginalized communities, these groups remain particularly vulnerable to hate speech.^[11] According to Eurostat, in 2023, Luxembourg recorded the second-highest rate of online hate speech related to "racial or ethnic origin" in the European Union, at 33% (Eurostat, 2023). In 2024, several cases of hate speech targeting vulnerable communities and political representatives were widely discussed in the media.

One likely reason for the spreading of hate speech online is that marginalized communities remain underrepresented in the mainstream media. Both private media outlets and public service media (PSM) in Luxembourg lack comprehensive diversity policies aimed at promoting the representation of marginalized communities. However, they are required to implement moderation mechanisms limiting hate speech for their online platforms. The effectiveness of these moderation efforts remains difficult to assess. Furthermore, there is insufficient data to evaluate the role of video service providers and instant messaging platforms in curbing the spread of hate speech within the country. All in all, existing efforts to limit the spread of hate speech and illegal content still need improvement. As observed by Bee Secure, this is particularly challenging because some content inevitably goes unnoticed, as well as content classified as "indirect hate speech" (Mediareform, 6/11/2024). Indirect hate speech refers to material that incites hate or violence against a group of people with specific characteristics (e.g., religion, age, gender, sexual orientation) but is not considered illegal under current laws.

Issues requiring particular scrutiny:

- **Radio 100.7's extension in the use of languages**

According to the convention on public service media, Radio 100.7 will, before December 31, 2025, conduct a study on the development of new audio services in a second language. This study will assess the need and demand for such services as well as determine the language to be used, if applicable (Gouvernement luxembourgeois, 2023). This initiative is relevant and, in theory, should help Radio 100.7 reach a broader audience. However, it remains to be seen how effective it will be in practice.

- **Issues with hate speech**

Apart TV's program *Riicht eraus* was reprimanded by ALIA (Luxembourg Independent Audiovisual Authority) for a January 2024 episode featuring comments about a debate aimed at banning begging in Luxembourg City. ALIA classified statements made by Simone Beissel (DP), deputy and alderwoman of Luxembourg City, and Astrid Lulling (CSV), former MEP, as incitement to hatred, particularly targeting the

marginalized Roma community (Javel, F., 2024). This incident highlights ongoing challenges in addressing hate speech and ensuring respectful representation within Luxembourg's media landscape. The topic of hate speech was also analyzed and discussed at the 4th conference on media reform titled "Anonymity, incitement to violence and hatred on the internet: how far does freedom of expression go?", organized in partnership with the Ministry of State, Department of Media, Connectivity and Digital Policy and the University of Luxembourg (Mediareform, 2025). The conference discussions concluded that online anonymity can encourage incitement to violence and hate speech, potentially threatening freedom of expression through the moderation of hateful and violent content. To address these challenges, it has been suggested that the Ministry of Media, Connectivity and Digital Policy, organizations such as Bee Secure, online social networking platforms, and stakeholders should work together to regulate or help regulate anonymity and hate/violent speech.

LOCAL/REGIONAL AND COMMUNITY MEDIA

LOW RISK

The amended 1991 Law on electronic media in Luxembourg recognizes the existence of a "local radio service" but does not specify its missions and obligations (Loi du 27 juillet 1991 sur les médias électroniques, 2022). These missions are detailed in the specifications included in concession contracts with the State. Due to Luxembourg's small size, there is no distinct local written press; instead, national written press integrates local and national information. Experts who participated in the MPM have observed a trend where national written and audiovisual media increasingly reduce their coverage of local news, largely due to financial constraints. As one expert observes (Anonymous, January 2025) : "Unfortunately, in recent years, local coverage in larger media outlets has been steadily declining. Editorial teams are often understaffed and unable to attend smaller local council meetings or cover similar community events." This decline poses serious challenges, as people in their communities increasingly feel unseen or unrepresented by the press, while local politicians may sometimes operate without the scrutiny of a critical media presence.

Another expert (Anonymous, January 2025) highlights that local news is primarily covered by print media. However, the new funding scheme disproportionately favors media outlets that focus exclusively on digital reporting, offering less support to those that combine online and print reporting. This imbalance further exacerbates the challenges faced by traditional outlets in maintaining robust local news coverage.

The local media offer does not cover all regions (Lukasik, 2024) and fails to fulfill the missions of professional journalism. Local TV channels, which lack legal recognition, are generally owned by municipalities and primarily serve as communication tools for local governments.^[12] Local radio stations, by law, operate as non-profit associations managed by passionate amateurs. Their main missions, as outlined in the 1991 law on electronic media, are to promote local life, culture, and creativity. The state and municipalities support regional and local media through a limited number of subsidies (Lukasik, 2024). However, the amount of these subsidies is not easily accessible—if accessible at all. Their annual accounts are filed with the Trade and Companies Register (RCS) but are not published. It is therefore not possible to assess the viability of the local media (Recueil Electronique des Sociétés et Associations, 2024).

Radio ARA, the only national electronic community media, plays an important function to give a voice to minorities and benefits from state support based on a convention running for 2021-2025 with funding of 1 200 000 euros spread over 5 years (Data public, 2021).

Issue requiring particular scrutiny :

- **Clarification about the role of community media**

To date, community media are not explicitly recognized in Luxembourg's Law (Loi du 27 juillet 1991 sur les médias électroniques, 2022). Radio ARA, the only community radio station in Luxembourg, is legally classified as a broadcast network radio service, similar to Essentiel Radio, Radio Latina, and Eldorado. However, its "community identity" is indirectly acknowledged through the convention concluded with the State of the Grand Duchy of Luxembourg for 2021–2025, where it is defined as a "citizens' radio" (*ibidem*). In contrast, written community media are supported under the scheme "Education to Media and Citizenship," established by the Law of 30 July 2021 on a support framework for professional journalism (Loi du 30 juillet 2021 relative à un régime d'aides en faveur du journalisme professionnel, 2021). In 2024, this scheme benefited the monthly publication, *Forum* (Data public, 2023). Considering that community media play an essential role in media education and in amplifying underrepresented voices in public discourse, it would be prudent to initiate a strategic debate on their definition, functioning, and role. This is particularly relevant in an era where information dissemination is increasingly dominated by foreign private social media platforms and generative AI technologies.

GENDER EQUALITY IN THE MEDIA

HIGH RISK

Luxembourg media landscape remains particularly weak when it comes to the presence of women in key positions. Radio 100.7 has no legal obligation concerning gender equality and no explicit gender equality policy has been formulated. The only obligation derives from the state pluriannual convention is that it should strive to promote balanced gender representation in its content (Gouvernement luxembourgeois, 2023). In detail there are no women represented on its executive board that is composed by one male director. There is however an almost equal representation in the PSM management board with 6 men and 5 women (Paperjam, 2025). Moreover, the absence of gender policy does not imply that in practice we observe problem of gender discrimination both in terms of collaborator and programming in the PSM. With regards to RTL Luxembourg, the management board (Clit- Ufa) is composed of 5 women out of 18 members^[14], and in the executive board of RTL group (which combines RTL television, radio and digital platform in Luxembourg) there is just 1 woman and 8 men.

Women account for 33% of editors-in-chief in the main news media. For the main television and radio, they are 3 men and 2 women as chief editors^[15]. And for newspapers, there are 13 men^[16] and 6 women^[17]. In total, only eight women hold the position of editor-in-chief across twenty-four media outlets^[13]. Written media which benefit from state support or through convention are required to indicate in their annual report, the ratio of men to women in the editorial office (Loi du 30 juillet 2021 relative à un régime d'aides en faveur du journalisme professionnel, 2021). We do not have data for the 19 local media; only two editors-in-chief of two local media are listed on the Press Council website (Conseil de presse, 2024), : Nordlicht TV and Radio ARA.

Issues requiring particular scrutiny :

- **Absence of data on the representation of women in news**

In November 2023, Alice Welter, a journalist at RTL.lu, created L'Effrontée, Luxembourg's "first feminist media outlet," on Instagram (Liégeois, L., 2024). This platform highlights inequalities experienced by women in Luxembourg and beyond. However, comprehensive data on women's representation in news and current affairs programs, particularly regarding proportionate and stereotype-free portrayal, is lacking. The creation of L'Effrontée has since gained significant traction, amassing over a thousand followers and establishing itself as a watchdog against sexist discourse in Luxembourg media. Welter notes that women are underrepresented among journalists and nearly absent when experts are consulted, especially in economics, politics, and sports. While L'Effrontée provides valuable insights, there is still a scarcity of recent, comprehensive data on gender representation in Luxembourg media. The most recent accessible data appears to be from the Global Media Monitoring Project 2020, highlighting the need for updated studies on this subject (Gouvernement, 2020).

- **Absence of data to compare gender ratio for experts in informative programs and articles**

This gap in information underscores the necessity to introduce permanent monitoring processes to assess progress in gender equality within Luxembourg's media landscape.

MEDIA LITERACY

MEDIUM - LOW RISK

Although media literacy policy is already well-established, thanks to several parallel initiatives involving various segments of the population, there is still room for improvement, particularly understanding journalistic information. Media literacy is included in the 2009 law on the organisation of primary and secondary education which stipulates that media education must be integrated at different levels of education (Loi du 6 février 2009 portant organisation de l'enseignement fondamental, 2009). It is compulsory in secondary education in the subject called digital sciences (from year 5 onwards) and there are numerous initiatives aimed at promoting certain aspects of media literacy both within and outside the formal education system.

The national Digital (4) Education strategy implemented in 2015 by the Ministry of Education, Children and Youth aimed to enable pupils to develop the skills necessary for the appropriate and responsible use of ICT and to promote innovative educational projects using digital technologies in schools. The Digital (4) Education strategy was then replaced in 2020 by the initiative 'Simply Digital' (Einfach Digital) that is structured around three flagship projects: i) General framework for media literacy and media skills (Medienkompass); ii) Coding in school education: Computer science will be taught as a new subject in the early years of secondary education; iii) Awareness campaign on the use of screens in the family: guidelines and advice for parents to promote a safe use of Internet.

Globally, there is a lack of specific measures in formal education that address media in the context of professional journalism and its functioning. According to the school guide

MedienKompass (Medienkompass, 2020), media education policy is primarily focused on tools and technology, with insufficient emphasis on professional news media. In the current strategy for media literacy, there are very few initiatives related to journalism within formal education. The most notable is the *Young Journalist Competition*, an annual event organized by the Ministry of Education, Children and Youth, the Press Council, and the Centre for Political Education (*Zentrum für politisch Bildung*, ZpB). The competition aims to promote media literacy and raise awareness about journalism among students in formal education, including those in primary, secondary, technical, and differentiated education. The same goes for Bee secure, which is a government initiative focusing on internet security and the reporting of illegal content.

In parallel that state incentivizes media actors to promote media literacy through legislative measures and conventions. Written media which benefit from state support (Loi du 30 juillet 2021 relative à un régime d'aides en faveur du journalisme professionnel, 2021) under the “maintaining pluralism” and “promotion of pluralism” schemes must report annually on actions taken to support media literacy, while written media benefiting from the support scheme “education to media and citizenship” are required to take concrete action contribute to the promotion of media literacy, which also include the benevolent participation of citizens in editorial activity. As part of its public service missions defined in its pluriannual convention with the state, RTL is invited to stimulate the expertise in the domain of the media in cooperation notably with the University of Luxembourg and school and industries that are active in the media. In this context, RTL has co-founded a Belgian-Luxembourg observatory to combat disinformation: EDMO BELUX (Edmo Belux, 2024). Its mission includes fact-checking, promoting media literacy, and conducting research in multiple languages. Members from Luxembourg’s universities and media organizations serve on its Advisory Board.

The Luxembourg Independent Authority for Audiovisual Media (ALIA) is asked to play a critical role in advancing media literacy across all sectors of society. Established under the amended law of July 27, 1991, ALIA’s mandate includes promoting media literacy for citizens of all ages (Loi du 27 juillet 1991 sur les médias électroniques, 2022).

Issues requiring particular scrutiny :

- **Strengthening Media Literacy**

It is essential to enhance media literacy by integrating professional media into educational initiatives, particularly in light of the blurred boundaries on social networks between professionally produced, high-quality information and user-generated content or influencer material (which can sometimes include disinformation). To achieve this, universities, research findings, and students must play a more active role in media literacy efforts. Media education should place greater emphasis on understanding how professional journalistic media operate and the ways in which information is presented. This is especially important given that, according to Eurostat (2023), only 40.29% of individuals in Luxembourg reported verifying the accuracy of information or content found on news sites or social networks within the past three months.

- **Insufficient media literacy initiatives targeting vulnerable groups**

Current initiatives focusing on young people (children and teenagers) often overlook university students. This group is also vulnerable, as they are at a critical stage of intellectual development during their young adult lives. An example to follow is the GoldenMe initiative, which organizes activities and workshops for the elderly (Golden me asbl, 2024).

Recommendations for Social Inclusiveness

Unlike other European countries and contrary to the recommendations of European Directive 2018/1808 on audiovisual media services, the University of Luxembourg does not offer dedicated media literacy courses in higher education. This gap creates a lack of continuity in media literacy education between secondary school and university levels in Luxembourg, hindering the ability to keep teaching practices current and aligned with other European countries. By introducing media literacy and journalism programs at the university level, Luxembourg could provide stronger support to primary and secondary education, train more qualified teachers and ensure continuity and sustainability of media literacy learning. Luxembourg currently lacks a dedicated center for media, information, and journalism education, as well as higher education programs specifically focused on these subjects to train teachers. This absence is particularly concerning given that disinformation is recognized as one of the most significant global threats.

Recommendations for government, journalists, the Press Council and University of Luxembourg :

- Establishing a media literacy and journalism department at the University of Luxembourg ;
- Creating partnerships between the university and media organizations ;
- Developing comprehensive media literacy curricula for all educational levels ;
- Implementing regular training programs for educators in media literacy.
- To ensure consistent and comprehensive accessibility improvements across all media platforms, an effective policy should introduce mandatory measures.
- Furthermore, an independent Accessibility Observatory should be established to audit accessibility efforts—not only those of public administrations (as currently planned) but also those undertaken by media outlets.

4. EMFA Observatory - Year 1 : Before the implementation

In this section, we are assessing the state of play of the EMFA before its entry into full force, based on specific themes monitored by the MPM questionnaire.

FUNDAMENTAL PROTECTION

Platforms' moderation of media content

Since February 17th 2024, online platforms have had to comply with the new DSA rules on content moderation. Available data, however, is not sufficient to provide a reliable assessment of content moderation practices of very large online platforms regarding media service providers. Further empirical research is necessary to determine whether content moderation mechanisms align with legal safeguards. In case of violations of freedom of expression and access to information that resulted from content moderation practices, user can currently submit a complaint to the Autorité de la Concurrence if the providers of online intermediary services fail to comply with any of their obligations under the DSA. Complaints can be submitted online via MyGuichet.lu, with or without authentication; or via the PDF complaint form to be sent by e-mail or post.

Surveillance of journalists and protection of sources

The protection of journalistic sources is explicitly recognised by 2004 and is generally enforced in practice. There were no cases in 2024 of violation of the protection of sources. The illegal monitoring of journalists or media service providers and their family members by State authorities is prevented by Law of 1 August 2018 “on the protection of individuals with regard to the processing of personal data in criminal matters and in matters of national security” transposing into national law of Directive (EU) 2016/680 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

National regulatory authorities

The tasks and responsibilities of the media authority are defined in detail in the law. Art. 35 of the 1991 Law on Electronic Media defines tasks, duties, and responsibilities.

Regarding the media authority decisions, there are appeal mechanisms in place. Art. 35 (4) of the Law on Electronic Media says that the service provider can make his case in writing and be heard (where he can be assisted or represented). Paragraph 6 of the same article holds that reversal on appeal is open before the Administrative Court against sanctions decided by the authority.

The information concerning the activities of ALIA are transparent through the website sections news, opinions, and decisions. However the human and technical resources are inadequate to perform correctly its functions.

The “Autorité de la concurrence” (competition authority) has been appointed a coordinating authority for monitoring the compliance of Luxembourg platforms with the European Digital Services Act (DSA).

MARKET PLURALITY

Transparency of media ownership

Existing legal requirements do not ensure the level of transparency of media ownership required by Article 6 EMFA. The national law contains specific provisions requiring the disclosure of ownership details in the media sector, but it's limited to print press. According to the Article 66 of the Law on Freedom of expression, only the identity of the following people must be disclosed: (1) people holding directly or indirectly more than 25 per cent of the legal capital of the legal person, (2) people composing the administrative and management bodies, as well as (3) people in charge of the management of the company. This information is to be published once a year, in the first edition or the first delivery. It is not clear to what extent these legal provisions are applicable to the online version of the print media. Concerning electronic media, the law on freedom of expression specifically indicates in article 69 that these provisions do not apply to electronic media regulated in the law of 1991 on electronic media. The Law on the Electronic Media, does not specifically set out ownership disclosure obligations but does allow the possibility that ownership information can be requested for all forms of electronic media that have a license via the "book of obligations" which is attached to each license or permit granted by Luxembourg.

Media market concentrations

There is no national regulation about concentration in the media sector, even for the digital media. There is no separate assessment of the impact of media market concentrations on media pluralism.

Editorial independence (economic)

Several auto-regulation measures are aiming at limiting commercial influence. Article 10 (d-1) of the internal regulations of the press council explicitly emphasises that a journalist is not authorised to carry out commercial activities or to be involved in the advertising sector. Article 11 of the code of ethics of the press council adds that the press must be independent of any commercial interest: advertising must be presented in such a way that it cannot be confused with editorial content; journalists undertake not to sign advertising articles; if the press makes investment recommendations, it must only provide recommendations that comply with the law; and journalists undertake not to use the financial information that is to be published for their own benefit. Furthermore, Article 6 of the Journalists' Code of Ethics states that the work of a journalist involves the rejection of all forms of venality and the pursuit of the sole objective of providing information and shaping public opinion. In addition, journalists and editors-in-chief must not accept any advantage or promise that could limit their independence and the expression of their own opinion. The press must not give in to any direct or indirect pressure or any promises in relation to its information. Finally, Article 10 (d-1) of the internal regulations of the press council emphasises the fact that a journalist is not authorised to carry out commercial activities or to be involved in the advertising sector.

POLITICAL INDEPENDENCE

Editorial independence (political)

The Code of Ethics drawn up by the Press Council covers the written, audiovisual and electronic press. All journalists must sign it and editors-in-chief must ensure that it is respected by their employees. The code does not clearly cover political independence, although Article 6 stipulates that journalists and editors-in-chief must not accept any advantage or promise that could limit their independence and the expression of their own opinion. This could also include political independence. Article 3 also stipulates that journalists and editors must respect the 'independence and dignity of the profession'. Article 6 mainly concerns independence from commercial interests. Being a journalist means rejecting all forms of venality and pursuing the sole objective of informing and shaping public opinion. The press must not give in to any pressure or promise, direct or indirect, concerning its information.

In Luxembourg, the press council has no external members, only editors-in-chief and journalists. With regard to internal codes aimed at preventing any political influence, each media organisation must publish its editorial line and ensure respect for pluralism. However, given the size of the Luxembourg media (for example, a medium such as the Letzebuurger Journal, which has a team of 13 employees), the establishment of an internal body within the newspaper itself is not very realistic. On the other hand, RTL, the dominant national audiovisual media, can afford it and has set up an Ethics Committee made up of content managers (news and non-news) from RTL Luxembourg as well as one or more members of the editorial teams. The Ethics Committee guarantees permanent self-regulation of content that may be deemed critical by the editorial teams. It will meet regularly to examine content in accordance with the specifications and the RTL Luxembourg Journalists' Charter.

State Advertising

The current legislation does not provide fair and transparent rules for the allocation of state advertising to media outlets, as required by the European Media Freedom Act (EMFA).

Independence of public service media

The only public service media in Luxembourg is Radio 100.7, while RTL Luxembourg is a private media outlet with public service missions. The independence of radio 100.7 from the government and any other political influence was reinforced and legally sanctioned by the adoption of the law of 2022 organizing the public establishment "Public service media 100.7" (see MPM 2023) and by the pluriannual convention signed in 2023 which ensures sufficient income until 2030. RTL Lëtzebuerg, under the 2024-2030 CLT-UFA agreement, is a private company with public service missions. The programmes and content of RTL, which has a public service remit must reflect pluralism of opinion and objectivity. RTL operates under the supervision of ALIA and a monitoring committee composed of members appointed by the government and one member appointed by parliament. The monitoring committee's role is to monitor compliance with the public service agreement signed with the State in June 2022, which runs from January 1, 2024, to December 31, 2030. This body should ensure that RTL Luxembourg fulfills its public service mission and remains independent of political influence. Additionally, an internal rule prohibits journalists engaged in partisan politics from continuing to work

for RTL. Even though the functions of the RTL Monitoring Commission are crucial for both the public and media accountability, its deliberations, decisions, and study reports are not publicly available for scrutiny.

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- [9] (https://img.100komma7.lu/uploads/media/default/0002/50/20221122-statut-redactionnel-100-7_4de2c3.pdf)
- [10] (https://img.100komma7.lu/uploads/media/default/0002/50/20221122-statut-redactionnel-100-7_4de2c3.pdf)
- [11] Several public and civil society organizations are active in monitoring the presence of hate speech in Luxembourg, among them: ASTI, Zentrum fir Politesch Bildung, Centre pour l'égalité de traitement, Musée de la résistance, Conférence Générale de la Jeunesse du Luxembourg, Agence nationale pour l'information des jeunes. Finally, BEE SECURE deals with the subject in the frame of various awareness raising actions.
- [12] The local television channel services are : Stengefort TV (channel of the municipality of Steinfort), Pétange Info TV, Nordlicht, Miersch TV, Esch TV, Dudelange TV, Dikrich TV, .dok den oppene kanal (former channel which operates a selection of programs from local channels, recently closed in December 2023) .
- [13] As Woxx is run by a cooperative with no clear hierarchy (previously, Richard Graf was clearly mentioned as director), we considered the weekly could not include it in this calculation.
- [14] According to the register of Commerce and Companies (RCS) in December 2024 the management boards of CLT-UFA group (RTL) these are: Bofferding Taina, Spautz Marc, Bauer Björn, Baum Gilles , Bouchon Samuel, Costadura Francesco, Fischer Andreas, Ghesquiere Siska, Goossens Christophe, Heggen ELMAR, Hoffmann Tom, Metz Véronique, Pauly Serge , Rabe Thomas , Sauvé Sven , Schiltz Jean-Louis , Vidus Gabriella, GALEs Marie-Andrée.
- [15] RTL luxembourg: Marteling Luc; RTL radio: Grotz Roy; Radio 100.7: Franck Jean-Claude; Eldorado : Cynthia Meris; Radio Latina : Manuela PEREIRA.
- [16] Luxemburger Wort : Arens Roland, Tageblatt : Back Armand, L'essentiel : Kerrou Saïd, Le Quotidien : Duraisin Laurent, Zeitung vum Lëtzebuerger Vollek : Ruckert Ali, Delano: Grunwald Aaron, The Luxembourg Chronicle : Thompson Geoffrey, Revue: Hamus Eric; d'Lëtzebuerger Land : Feist Peter; Reporter.lu: Bumb Christoph; paperjam.lu : Labro Thierry; Wort.lu : Arens Roland, Silicon Luxembourg s.à r.l. : Machuron Charles-Louis;
- [17] Lëtzebuerger Journal : Hansen Melody, Femmes magazine : Pietrangeli Maria, Télécran: Folscheid Martina, Luxembourg times : Schnuer Cordula, virgule.lu : Mouzon Melodie, Contacto : Matias Pereira

Filipa.

- [18] The Digital (4) Education strategy is built around five dimensions digital Citizen: 1) prepare students and future citizens to live in a world where technologies play an ever-increasing roll; 2) digital Peer: promote a secure and responsible use of ICT technologies; 3) digital learner: provide teachers and pupils with the necessary resources (learning tools, software, multimedia resources, etc.) to create appropriate learning situations; 4) digital worker: give young people the skills required to manipulate the basic technological tools (preferably in a 'cloud' environment) in their daily working lives in order to be creative and productive, 5) Digital Entrepreneur: provide space, the so-called 'Maker-space', where initiatives and activities can be organized that encourage young people to take a look at various technologies and to supply the digital economy with specialists.

7. MPM Methodology

The Media Pluralism Monitor (MPM) is a research tool that is designed to identify potential risks to media pluralism in the Member States of the European Union and in Candidate Countries. It consists of a questionnaire of 200 variables divided into four main thematic areas - Fundamental Protection, Market Plurality, Political Independence and Social Inclusiveness - and 20 indicators. (see Table 1).

Fundamental Protection	Market Plurality	Political Independence	Social Inclusiveness
Protection of freedom of expression	Transparency of media ownership	Political independence of the media	Universal reach of traditional media and access to the Internet
Protection of information integrity	Plurality of media providers	Editorial autonomy	Representation of minorities in the media
Protection of right to information	Plurality in digital markets	Integrity of political information during elections	Local/regional and community media
Journalistic profession, standards and protection	Media viability	State regulation of resources and support to the media sector	Gender equality in the media
Independence and effectiveness of the media authority	Editorial independence from commercial and owners' influence	Independence of PSM	Media Literacy

Table 1: Areas and Indicators of the Media Pluralism Monitor

The results for each thematic area and Indicator are presented on a scale from 0 to 100% and six-tier system: (1) Very low risk (Rounded score comprised between 0 % and 16% included), (2) Low risk (Rounded score comprised between 17% and 33% included), (3) Medium-low risk (Rounded score comprised between 34 % and 50% included), (4) Medium-high risk (Rounded score comprised between 51% and 66% included), (5) High risk (Rounded score comprised between 67% and 83% included), (6) Very high risk (Rounded score comprised between 84% and 100% included). With regard to the Indicators, scores of 0 are rated as 3%, while scores of 100 are rated as 97%, by default, in order to avoid an assessment that offers a total absence, or certainty, of risk.

To carry out the national data collection, the CMPF partners with experienced, independent national researchers (See Annexe I). These answer and score the variables contained in the questionnaire developed by the CMPF and author the narrative reports. The CMPF staff reviews the work of the national experts at each stage of the implementation of the MPM, including the data collection and the national report. Moreover, to ensure accurate and reliable findings, a group of national experts in each country reviewed the answers to particularly evaluative questions (see Annexe II for the list of experts). For a list of selected countries, the final country report was peer-reviewed by an independent country expert.

This narrative report has been produced on the basis of the implementation of the MPM that was carried out in 2024. The implementation was conducted in 27 EU Member States, as well as in Albania, Montenegro, The Republic of North Macedonia, Serbia and Turkey. This year a part of the MPM has also been implemented in Bosnia and Herzegovina and Moldova. This project, under a preparatory action of the European Parliament, was supported by a grant awarded by the European Commission to the Centre for

ANNEXE I. COUNTRY TEAM

First name	Last name	Position	Institution	MPM2025 CT Leader
<i>Raphael</i>	<i>Kies</i>	<i>Research Scientist</i>	<i>University of Luxembourg</i>	X
<i>Stephanie</i>	<i>Lukasik</i>	<i>Researcher</i>	<i>University of Luxembourg</i>	X

ANNEXE II. GROUP OF EXPERTS

The Group of Experts is composed of specialists with a substantial knowledge and experience in the field of media. The role of the Group of Experts was to review especially sensitive/subjective evaluations drafted by the Country Team in order to maximize the objectivity of the replies given, ensuring the accuracy of the final results.

First name	Last name	Position	Institution
<i>Luc</i>	<i>Caregari</i>	<i>Journalist</i>	<i>Reporter.lu</i>
<i>Christophe</i>	<i>Goossens</i>	<i>CEO</i>	<i>RTL Lëtzebuerg</i>
<i>Jean-Lou</i>	<i>Siweck</i>	<i>Director</i>	<i>Radio 100.7</i>
<i>Melody</i>	<i>Hansen</i>	<i>editor in chief</i>	<i>Letzebuerguer Journal</i>
<i>Misch</i>	<i>Pautsch</i>	<i>Journalist</i>	<i>Letzebuenger Journal</i>
<i>Peschel</i>	<i>Franziska</i>	<i>Journaliste</i>	<i>Radio ARA</i>
<i>Paul</i>	<i>Peckels</i>	<i>Chief executive officer</i>	<i>Mediahuis</i>
<i>Veronique</i>	<i>Faber</i>	<i>Chair</i>	<i>Board of Directors Radio 100.7</i>
<i>Christina</i>	<i>Schuerr</i>	<i>Advisor</i>	<i>Ministry of Consumer Protection</i>
<i>Maurizio</i>	<i>Maffei</i>	<i>small media publishers association</i>	<i>ALEMI</i>
<i>Cloos</i>	<i>Michelle</i>		<i>Editpress</i>

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