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COMMUNICATION FROM THE COMMISSION

Commission guidelines on the implementation of the declaration functionality for media service providers pursuant to Article 18 (1) of Regulation (EU) 2024/1083 (European Media Freedom Act)

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1. INTRODUCTION

1. The European Media Freedom Act (Regulation (EU) 2024/1083¹, hereafter ‘the EMFA’) provides in Article 18 a set of safeguards for media service providers. These safeguards relate to the moderation of media service providers’ content by providers of very large online platforms (hereinafter ‘providers of VLOPs’)², when such moderation is based on the latter’s relevant terms and conditions. To benefit from these safeguards, media service providers need to declare that they fulfil a number of elements, as listed in Article 18(1), first subparagraph, points (a) to (g), of the EMFA. To facilitate this, Article 18(1) of the EMFA requires providers of VLOPs to set up a functionality enabling media service providers to submit this declaration.
2. Pursuant to Article 18(9) of the EMFA, the Commission is tasked with issuing guidelines to facilitate the effective implementation of the functionality referred to in Article 18(1). Recital 53 of the EMFA further indicates that the guidelines should contribute to minimising the risk of potential abuse of that functionality, in particular by media service providers that systematically engage in disinformation, information manipulation and interference, including those controlled by certain third countries, taking into account the criteria to be developed by the European Board for Media Services regarding media service providers from outside the Union. It clarifies that the guidelines may include arrangements relating to the involvement of recognised civil society organisations, including fact-checking organisations, in reviewing declarations or to the consultation of national regulatory authorities or bodies or co-regulatory or self-regulatory bodies. For instance, such involvement could entail, the possibility for those organisations to flag to providers of VLOPs any potential issues regarding compliance by media service providers with the relevant elements for the declaration.

¹ Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act) OJ L, 2024/1083, 17.4.2024.

² Online platforms with an average of at least 45 million monthly active users in the EU, as designated by the Commission in accordance with Article 33(4) of the Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) OJ L 277, 27.10.2022, p. 1.

3. These guidelines aim to facilitate the application of the rules by laying down the essential design and operating features that the declaration functionality should have. Those features should contribute to ensuring that the declaration functionality is easy to find, easy to use and easy to access for media service providers, while giving providers of VLOPs the flexibility needed to adapt the features to the specific characteristics of their services and business models.
4. In preparing these guidelines, the Commission carried out a targeted consultation involving relevant stakeholders, including representatives of providers of VLOPs, media service providers, civil society organisations and fact-checking organisations, and regulatory authorities.
5. These guidelines reflect the Commission's understanding of Article 18 of the EMFA. Only the Court of Justice of the European Union can provide a final and authoritative interpretation of EU law.
6. Section 2 of these guidelines sets out their scope and purpose. Section 3 sets out the minimum general features that the declaration functionality should have in the view of the Commission. Section 4 provides guidance on the elements to be declared pursuant to Article 18(1), first subparagraph, points (a) to (g), of the EMFA that could support both media service providers and providers of VLOPs in dealing with the submission of a declaration. In Section 5, the Commission details other aspects related to the handling of declarations. Section 6 sets out arrangements for providers of VLOPs to consult regulatory authorities or bodies or co-regulatory or self-regulatory mechanisms where they have 'reasonable doubt' regarding media service providers' compliance with Article 18(1), first subparagraph, point (d), of the EMFA. Section 7 sets out the Commission's guidance for the general arrangements for involving civil society organisations, including fact-checking organisations, in reviewing the declarations.

2. SCOPE OF THE GUIDELINES

7. Pursuant to Article 18(1) of the EMFA, providers of VLOPs are required to make the declaration functionality available to media service providers that are recipients of their services. Recital 53 of the EMFA further clarifies that the providers of VLOPs that should put in place a declaration functionality are those that provide access to media content.
8. To clarify the addressees and the scope of the obligations in Article 18(1), the Commission takes the view that all the elements of the definition of 'media service' in the EMFA should be taken into account. Notably, pursuant to Article 2, point (1), of the EMFA, a media service is a service where

the principal purpose of the service or a dissociable section thereof consists in providing programmes or press publications, under the editorial responsibility of a media service provider, to the general public, by any means, in order to inform, entertain or educate. Article 2, point (1), of the EMFA should also be read in conjunction with the definition of ‘media service provider’ in Article 2, point (2), which states that such a provider should be understood as ‘a natural or legal person whose professional activity is to provide a media service ...’. Recital 9 of the EMFA further highlights the professional character of the activity as a determining factor to be taken into account for identifying legal or natural persons providing a media service. Recital 9 of the EMFA also acknowledges that media service providers can operate in different forms in the internal market and indicates that the definition of media service provider should be understood as covering a wide spectrum of professional media actors, including freelancers.

9. As explained in recital 50 of the EMFA, the objective of Article 18 of the EMFA is to uphold media freedom and pluralism in the digital environment by minimising the impact of content moderation decisions on the editorial integrity of media service providers and on the circulation of information that is trustworthy and produced in line with editorial and professional standards. Article 18 of the EMFA aims to protect professional journalistic activities of media service providers who exercise editorial responsibility over their programmes or press publications, covering in particular matters of public interest, societal issues or cultural phenomena that ultimately contribute to public discourse and democratic debate³.

10. Therefore, the requirement to put in place the functionality under Article 18(1) of the EMFA should, in line with recital 53 of the EMFA, cover providers of VLOPs providing access to media content, namely those storing and disseminating to the public information which includes programmes or press publications produced by media service providers in line with editorial and professional standards, insofar as it would be disproportionate or irrelevant for the objective of the provision to cover other providers of VLOPs such as online marketplaces or platforms providing adult content.

3. GENERAL FEATURES OF THE DECLARATION FUNCTIONALITY

³ These guidelines should be without prejudice to the rules applicable to content provided by media service providers which may constitute advertising, including political advertising, or commercial communication as defined by other EU legislative acts, such as the Digital Services Act, Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive), as amended by Directive (EU) 2018/1808 OJ L 095 15.4.2010, p. 1 and Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising OJ L, 2024/900, 20.3.2024.

11. The purpose of this section is to set out guidance on the implementation of the declaration functionality. The aim is to ensure, to the greatest extent possible, that the functionality is implemented in a consistent and effective manner by providers of VLOPs, without prejudice to the different business models and specific characteristics of each provider.
12. The functionality that providers of VLOPs are required to put in place under Article 18(1) of the EMFA is a key precondition for media service providers to benefit from the safeguards against unwarranted moderation decisions related to content considered incompatible with the terms and conditions of the VLOPs.
13. The functionality should form an integral part of the infrastructure of providers of VLOPs. It should consist of a dedicated and prominent feature on their interface, so that media service providers can easily find and access it, e.g. through their accounts on the platform.
14. The functionality should be designed as a standardised questionnaire that should be available in all the official languages of each Member State where providers of VLOPs offer their services. In particular, the questionnaire should consist of a pre-compiled checkbox list that media service providers can fill in to declare that they fulfil the specific elements set out in Article 18(1), first subparagraph, points (a) to (e), of the EMFA. The questionnaire should enable service providers to provide the information referred to in Article 18(1), first subparagraph, points (f) and (g), for instance via an entry box or an attachment section.
15. Providers of VLOPs should ensure that the functionality includes a feature enabling media service providers to declare all the accounts they operate with on a given platform in a single submission. This would make the declaration less burdensome for those media service providers that operate multiple accounts on a given platform as they would not be required to undertake distinct and individual declarations for each underlying account they operate.
16. To prevent the submission of declarations automatically completed by bots or other automated software, providers of VLOPs should ensure that the functionality includes a feature allowing media service providers to datemark and electronically sign their declaration as well as to authenticate and verify them through Completely Automated Public Turing test to tell Computers and Humans Apart (CAPTCHA) or similar protocols designed to differentiate between human users and automated software.
17. The functionality should also include an optional feature allowing media service providers to upload any information related to the fulfilment of the elements declared pursuant to Article 18(1) of the

EMFA that they deem relevant to support their declarations. In this respect, media service providers should have the possibility to indicate whether this further supporting information could be made publicly available. In any event, the possibility to make use of this optional feature to provide further supporting information should remain strictly subject to media service providers' sole discretion. As a result, the absence of additional supporting documents should not render the declaration incomplete or constitute grounds for its rejection.

18. The functionality operated by providers of VLOPs should allow sending an automated message acknowledging receipt of the declaration to the media service provider concerned once a declaration has been submitted. This message should also contain the contact details of the provider of the VLOP, including an email address that the media service provider can use to communicate directly and quickly, as required by Article 18(3) of the EMFA.
19. It should be possible for media service providers to monitor and manage the status of their declarations through their accounts on the platform and to update, amend or withdraw their declarations at any time. Updating or amending a declaration that has already been accepted should not be more burdensome than submitting the initial declaration nor should require a new submission.
20. Providers of VLOPs should make the declarations received publicly available in an easily accessible and machine-readable format. The same should apply to any further supporting information as referred to above in paragraph 17, in line with the requirement under Article 18(2) of the EMFA.
21. To raise awareness about the declaration functionality and facilitate its use, the Commission encourages providers of VLOPs to actively promote it to recipients of their services. This could be done by, for example, including the functionality in their terms and conditions as well as providing a general explanation of how to submit a declaration once the functionality is in place or setting up a dedicated contact point in this respect.

4. INDIVIDUAL ELEMENTS OF THE DECLARATION

22. The following subsections give guidance on certain aspects related to the individual elements that are listed in Article 18(1), first subparagraph, points (a) to (g) and that should be included in a declaration submitted by a media service provider.

4.1. ELEMENTS RELATED TO ARTICLE 18(1) FIRST SUBPARAGRAPH, POINTS (A) (B) AND (F)

23. According to Article 18(1), first subparagraph, points (a), (b) and (f) of the EMFA, the functionality shall allow media service providers to declare that they are media service providers and that they comply with Article 6(1) of the EMFA, as well as provide their legal name and contact details, including an email address, which should preferably be a dedicated mailbox to enable a stable channel of communication, which the provider of the VLOP can use to communicate with them quickly and directly.
24. For the purpose of handling declarations and facilitating the identification of media service providers, providers of VLOPs may consult publicly available EU-wide or national databases for up-to-date and comprehensive information on media service providers and their ownership. Such databases include the Euromedia Ownership Monitor⁴ or the national media ownership databases set up pursuant to Article 6(2) of the EMFA. The European Board for Media Services (hereafter ‘the Board’) could facilitate contacts between providers of VLOPs and the respective national authorities in charge of national databases.
25. Providers of VLOPs could also consult MAVISE⁵, a centralised, free-access database managed by the European Audiovisual Observatory. MAVISE provides information on the country of jurisdiction of audiovisual media service providers available in the European Economic Area, pursuant to the Audiovisual Media Services Directive.
26. In this context, as part of the optional feature described in paragraph 17 above, media service providers could include a direct link to the databases referred to in paragraphs 24 and 25 above and to the website containing the information required under Article 6(1) of the EMFA.

4.2. ELEMENTS RELATED TO ARTICLE 18(1) FIRST SUBPARAGRAPH, POINT (C)

27. In accordance with Article 18(1), first subparagraph, point (c), of the EMFA, the functionality shall allow media service providers to declare that they are editorially independent from Member States, political parties, third countries and entities controlled or financed by third countries.

⁴ [EurOMo \(Euromedia Ownership Monitor\)](#).

⁵ [MAVISE database](#).

28. As part of the optional feature described in paragraph 17 above, media service providers could upload relevant information, such as the internal measures, policies or procedures that they have put in place to uphold and foster their editorial independence. To this end, media service providers could seek inspiration from the Commission's Recommendation on internal safeguards for editorial independence and ownership transparency in the media sector, which includes a non-exhaustive and non-cumulative catalogue of voluntary measures aimed at safeguarding the independence and integrity of editorial decisions⁶.
29. The optional feature described in paragraph 17 above could also enable media service providers to indicate that they are not subject to any restrictive measures currently imposed by the European Union on the grounds of, inter alia, their lack of editorial independence⁷.

4.3. ELEMENTS RELATED TO ARTICLES 18(1), FIRST SUBPARAGRAPH, POINTS (D) AND (G)

30. In accordance with Article 18(1), first subparagraph, point (d), of the EMFA, the functionality shall allow media service providers to declare (i) that they are subject to regulatory requirements for the exercise of editorial responsibility in one or more Member States and to oversight by a competent national regulatory authority or body or (ii) that they adhere to a co-regulatory or self-regulatory mechanism governing editorial standards that is widely recognised by and accepted in the relevant media sector in one or more Member States.
31. These elements are alternative and not cumulative. Therefore, a media service provider which declares that it is subject to regulatory requirements for the exercise of editorial responsibility and oversight by a competent national regulatory authority or body would not need to also declare that it adheres to a co-regulatory or self-regulatory mechanism governing editorial standards that is widely recognised by and accepted in the relevant media sector in one or more Member States and vice-versa.
32. As part of the optional feature described in paragraph 17 above, media service providers could provide evidence in support of their declaration pursuant to Article 18(1), first subparagraph,

⁶ Commission Recommendation (EU) 2022/1634 of 16 September 2022 on internal safeguards for editorial independence and ownership transparency in the media sector.

⁷ An up-to-date list of restrictive measures currently imposed by the European Union can be found on the following website: <https://data.europa.eu/apps/eusanctionstracker/>.

point (d)⁸. Media service providers are also encouraged to upload supporting information about the co-regulatory or self-regulatory mechanism governing editorial standards that they adhere to⁹.

33. The Commission acknowledges that the level of development of co-regulatory or self-regulatory mechanisms may differ across Member States. In this regard, the Commission is of the view that the Board, as part of its general task of promoting the consistent and effective application of the EMFA, could foster and facilitate the development of effective, coherent and coordinated national co-regulatory or self-regulatory initiatives, including in the context of the structured dialogue under Article 19 of the EMFA.
34. For the purposes of Article 18 of the EMFA, co-regulatory or self-regulatory mechanisms are meant to guarantee effective governance of editorial standards, in full independence from state, political and commercial interests, and conduct their activities transparently, and are often entrusted with overseeing compliance in line with relevant ethical and professional standards
35. Examples of such co-regulatory or self-regulatory mechanisms include national media and press councils, as well as professional orders or associations overseeing the journalistic profession and which govern editorial standards.
36. In accordance with Article 18(1), first subparagraph, point (g), of the EMFA, the functionality shall allow media service providers to provide the contact details, including names, email addresses or telephone numbers, of relevant contact points of the relevant national regulatory authorities or bodies or representatives of the co-regulatory or self-regulatory mechanisms referred to in Article 18(1) first subparagraph, point (d), of the EMFA. In this regard, the Board is encouraged to assist media service providers and providers of VLOPs by providing an up-to-date list of the relevant national regulatory authorities or bodies and by gathering information on the relevant co-regulatory and self-regulatory mechanisms operating in the Member States.

4.4. ELEMENTS RELATED TO THE CONDITION UNDER ARTICLE 18(1), FIRST SUBPARAGRAPH, POINT (E)

37. The guidance provided below on how to apply Article 18(1), first subparagraph, point (e), of the EMFA is without prejudice to Article 50 of the Artificial Intelligence Act (Regulation (EU)

⁸ Examples may include certificates or relevant documentation from the press, media or ethics council established in one of the Member States or providing the link to the website of the council in question.

⁹ Examples include the measures taken by the mechanism in question to ensure compliance with its standards or the procedures for resolution and follow-up of complaints about non-compliance.

2024/1689) and to any guidelines or codes of practice issued pursuant to Article 50(7) and Article 96(1), first subparagraph, point (d), of that Regulation¹⁰.

38. In accordance with Article 18(1), first subparagraph, point (e), of the EMFA, the functionality shall allow media service providers to declare that they do not provide content generated by artificial intelligence systems without subjecting it to human review or editorial control.
39. As part of the optional feature described in paragraph 17 above, media service providers could share information on their practices with regard to human review or editorial control of content generated by artificial intelligence systems.
40. For instance, that information could relate to specific functions or roles within a media service provider's organisation that are entrusted with editorially reviewing content generated by artificial intelligence systems, or with taking editorial responsibility for such content.
41. In any event, the Commission recalls that the protection afforded by Article 18 of the EMFA with respect to content moderation by providers of VLOPs resulting in the suspension of the provision of their online intermediation services in relation to content provided by a media service provider extends to all content provided by media service providers, including that generated or manipulated by artificial intelligence systems, provided that media service providers subject such content to human review or editorial control as indicated by them in their declarations.

5. OTHER ASPECTS RELATING TO THE HANDLING OF DECLARATIONS

42. To ensure the handling of the submitted declarations within a reasonable time frame and without undue delays, as required by the last sentence of Article 18(3) of the EMFA, providers of VLOPs should process declarations individually and continuously as they are received. In particular, they should not limit the submission and processing of declarations to specific time periods.
43. The decision to accept, reject or invalidate a declaration should be based solely on the elements declared pursuant to Article 18(1) of the EMFA. The decision to accept, reject or invalidate a

¹⁰ Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act) OJ L, 2024/1689, 12.7.2024.

declaration should not be based on whether the media service provider's content is or is not compatible with the terms and conditions of the provider of the VLOP.

44. Providers of VLOPs may invalidate a declaration that has previously been accepted only if the media service provider concerned no longer fulfils one or more of the elements declared pursuant to Article 18(1), first subparagraph, points (a) to (e), of the EMFA.
45. To make it easier to identify potential compliance issues with regard to declarations, failure by a media service provider to fulfil one or more of the elements declared pursuant to Article 18(1) of the EMFA may be notified to providers of VLOP by the competent national regulatory authority or body or by the co-regulatory or self-regulatory mechanism. It may also be flagged by civil society organisations, including fact-checking organisations, such as those referred to in paragraph 57, in line with recital 53 of the EMFA.
46. Where failure to fulfil one or more of the elements declared pursuant to Article 18(1) of the EMFA has been flagged by civil society organisations, including fact-checking organisations, such as those referred to in paragraph 57, providers of VLOPs should seek confirmation on the matter from the competent national regulatory authority or body or the relevant co-regulatory or self-regulatory mechanism.
47. In this context, providers of VLOPs should ensure the availability of a human point of contact for the purposes of exchanges with media service providers, with competent national regulatory authorities or bodies or the relevant co-regulatory or self-regulatory mechanisms, and with civil society organisations, including fact-checking organisations, such as those referred to in paragraph 57.
48. If a declaration is rejected or invalidated, providers of VLOPs should inform the media service provider concerned of their decision without undue delay. When informing the media service provider concerned, providers of VLOPs should indicate their reasons for rejecting or invalidating the declaration and should refer to the remedies available to media service providers under Article 18(7) of the EMFA.

6. CONSULTATION OF NATIONAL REGULATORY AUTHORITIES OR BODIES OR CO-REGULATORY OR SELF-REGULATORY MECHANISMS IN CASE OF REASONABLE DOUBT

49. According to the last subparagraph of Article 18(1) of the EMFA, where there is a reasonable doubt as to whether the media service provider complies with what it declared under Article 18(1), first subparagraph, point (d) of the EMFA, i.e. that it is subject to regulatory requirements for the exercise of editorial responsibility in one or more Member States and to oversight by a competent national regulatory authority or body or whether it adheres to a co-regulatory or self-regulatory mechanism governing editorial standards that is widely recognised by and accepted in the relevant media sector in one or more Member States, providers of VLOPs should seek confirmation on the matter from the relevant national regulatory authority or body or the relevant co-regulatory or self-regulatory mechanism.
50. Recital 53 of the EMFA explains that contacting the national regulatory authority or body or the co-regulatory or self-regulatory mechanism would enable the provider of the VLOP to confirm whether the media service provider is subject to regulatory requirements or adheres to co-regulatory or self-regulatory mechanisms. That recital indicates that, where relevant, providers of VLOPs could rely on the available information regarding adherence to the relevant requirements and mechanisms, such as standards developed by the industry or other relevant codes of conduct.
51. In this context, ‘reasonable doubt’ would arise where providers of VLOPs cannot ascertain from the information submitted by the media service provider in its declaration whether that media service provider is subject to regulatory requirements or adheres to co-regulatory or self-regulatory requirements. This would be the case, for example, where information about membership of press councils is not publicly available or a media service provider does not appear in publicly available registries of the competent national regulatory authority or body that was indicated in the declaration.
52. If a competent national regulatory authority or body is consulted under Article 18(1), last subparagraph, of the EMFA, it should confirm whether the media service provider concerned is subject to regulatory requirements for the exercise of editorial responsibility and to its oversight. For the purposes of that confirmation, the competent national regulatory authority or body could take into account: (i) the national rules applicable to the media service provider; (ii) the criteria on the basis of which the media service provider falls under its jurisdiction and regulatory remit; (iii) the available national registries or lists that include the media service provider; and (iv) the relevant provisions setting out the regulatory powers that it can exercise over the media service provider.
53. For the purposes of the confirmation referred to in Article 18(1), last subparagraph, of the EMFA, a co-regulatory or self-regulatory mechanism that is widely recognised by and accepted in the media

sector in one or more Member States could take into account information relating to the adherence of the media service provider to the relevant editorial standards.

54. This information could include whether the media service provider is a member of the mechanism or is covered by it, or whether it is part of codes of conduct or other instruments setting out the applicable editorial standards
55. Where a competent national regulatory authority or body or a co-regulatory or self-regulatory mechanism has been consulted by a provider of a VLOP and has confirmed that a media service provider is subject to regulatory requirements or adheres to co-regulatory or self-regulatory requirements, the declaration should be accepted immediately, provided that all the other elements listed in Article 18(1) of the EMFA have also been fulfilled.

7. INVOLVEMENT OF CIVIL SOCIETY ORGANISATIONS AND FACT-CHECKING ORGANISATIONS

56. Civil society organisations and fact-checking organisations can play an important role in combating disinformation and foreign information manipulation and interference. They can help assess and verify online content and help ensure that the public has access to accurate, reliable and trustworthy information.
57. In line with recital 53 of the EMFA, the Commission encourages providers of VLOPs, in order to minimise the risk of potential abuse of the functionality, to work together with civil society organisations that have relevant expertise and knowledge in the media field, and adhere to methodology, ethics and transparency standards. Such organisations could include: (i) civil society organisations active at EU or national level in the field of media freedom and media pluralism; (ii) media literacy organisations; and (iii) fact-checking organisations such as those that are part of the European Digital Media Observatory (EDMO)¹¹ or the European Fact-Checking Standards Network (EFCSN)¹².
58. Providers of VLOPs should consider putting in place dedicated channels for consulting and sharing information with relevant organisations, such as those referred to in the previous paragraph. In this

¹¹ [EDMO | European Digital Media Observatory](#).

¹² [EFCSN | European Fact-Checking Standards Network Project – European Fact-Checking Standards Network Project](#).

respect, providers of VLOPs could designate specific and dedicated contact points to enable such organisations to flag any issues they identify when reviewing the publicly available declarations.

59. To that end, providers of VLOPs should consider ensuring that feedback mechanisms are in place for appropriate follow-up with relevant organisations, such as those referred to in paragraph 57. This would include, as a minimum, sending them confirmation that their flagging has been received and informing them of the follow-up to such flagging.
60. Cooperation between providers of VLOPs and relevant organisations, such as those referred to in paragraph 57, would need to be transparent. To that end, providers of VLOPs could provide a publicly available list of the organisations with which they collaborate.
61. The Commission also encourages relevant organisations, such as those referred to in paragraph 57, to act as intermediaries between providers of VLOPs and individuals, academics, researchers and other stakeholders who might identify issues with a media service provider's compliance with the elements declared pursuant to Article 18(1) of the EMFA that may merit further consideration. In such cases, relevant organisations, such as those referred to in paragraph 57, should use the available channels for consultation and information sharing, as foreseen in this Section, to bring the matter to the attention of providers of VLOPs.
62. The Commission considers that the Board should contribute to identifying the most relevant organisations that could work with providers of VLOPs. This could be done in the context of the structured dialogue between providers of VLOPs, representatives of media service providers and representatives of civil society referred to in Article 19(1) of the EMFA.

8. CONCLUSIONS

63. The Commission is fully committed to ensuring that Article 18 of the EMFA is effectively applied. The aim of these guidelines is to facilitate the roll-out of the declaration functionality referred to in Article 18(1) of the EMFA, to the benefit of all relevant stakeholders.
64. The Commission will monitor the implementation of these guidelines, including by taking into account any related developments and experiences, as discussed in the context of the structured dialogues referred to in Article 19(1) of the EMFA, and revise them as necessary.