



Autorité
luxembourgeoise
indépendante de
l'audiovisuel



Annual Report 2022

Since 2013, the Luxembourg Authority for Audiovisual Media (Autorité luxembourgeoise indépendante de l'audiovisuel, ALIA) monitors the proper application of regulatory texts in relation to audiovisual media services under Luxembourg jurisdiction. Today, its monitoring missions cover conventional television, on-demand services, video sharing platforms as well as national, regional and local radio stations.

ALIA also monitors and evaluates the classification of films carried out by cinema operators and is responsible for keeping and making available to the public all relevant information on which political opinion polls are based. Moreover, the Authority develops guidelines for media campaigns prior to elections. Finally, the institution is mandated by law to promote media literacy for citizens of all ages and in all sectors of society.

ALIA's three bodies are the Board of Directors, the Management and the Consultative Assembly.

For further information:

Autorité luxembourgeoise indépendante de l'audiovisuel
(Independent audiovisual authority of Luxembourg)

18, rue Erasme
L-1468 Luxembourg

www.alia.lu

T +352 247 – 70 105
M info@alia.etat.lu



Design: **101**

Table of contents

01	Preface by the President	4
	Containers and contents: convergences	
02	A word from the director	7
	Resilience alone will not be enough for the renowned demands of the media place	
03	ALIA and vloggers – competences of ALIA and rules vloggers have to comply with	10
04	Accessibility of audiovisual media services in Luxembourg	16
05	Media education	22
06	Review of monitoring and regulation of electronic media services	30
	■ Programme monitoring	33
	▼ Protection of minors	33
	▼ Commercial communications	33
	▼ Other topics	34
	■ Regulatory missions	36
	▼ Decisions	36
	▼ Advisory opinions	37
	■ Statistics	40
	■ Advisory committee	41
	■ Summary of the year 2022	42
07	European affairs and international relations	46
08	Financial resources	53
09	Annexes	57
	■ Annex 1	58
	▼ Composition of ALIA bodies	58
	■ Annex 2	59
	▼ New legislation	59
	■ Annex 3	61
	▼ Services subject to ALIA's supervision	61
10	Abbreviations	81





01
Preface by
the President

Containers
and contents:
convergences

Preface by the President



Containers and contents: convergences

A short research on the etymology of the term “media” tells us that it is a contraction of the original English terms “mass media”, designating all means of communication designed for mass dissemination of information. This brief definition leads me to consider the evolution in a modern world of the means of communication (containers) through which information (content) is distributed. Let us clarify, however, from the outset that the term “information” should not be understood in the restrictive sense of keeping the recipients of the communication informed of what is happening in the country and in the world, but in a broader sense of designating everything that makes it possible to inform, educate and distract recipients.

As for the means of communication, it is now obvious that the classic perception of media as encompassing only linear television, radio and printed press must be discarded. At the end of the 20th century, the use of linear television was completed by on-demand television (video-on-demand or VOD). VOD provided a new offer to viewers, but without really revolutionising the media market.

The evolution of technology since the 2000s, with the possibilities offered by the Internet, as well as the development and improvement of production tools and their reduction in size, have, on the other hand, completely shaken up this market. Where it was necessary to have heavy infrastructure and logistics in terms of means of production and dissemination, nowadays it only takes limited investments in equipment and a simple access to the Internet to open up to the whole world.

This resulted in the appearance of many new forms of communication modes: online print media, video-sharing platforms (VSP), social networks, information websites, bloggers, vloggers and other influencers to mention only the most obvious. All these forms being present on the Internet, it cannot be denied that they are intended for mass dissemination of information.

However, democratisation of access to mass dissemination of information also affects the nature of the disseminated information. If classic media, due to their organisational structure, generally respond to an editorial

logic ensuring the economic survival of the publisher and allowing to identify people having editorial responsibility, these elements are increasingly blurred in the new forms of information dissemination. It becomes increasingly difficult to monitor and regulate these contents.

Nevertheless, such monitoring and regulation is necessary. The reasons that motivated the constraints imposed on media in terms of content are justified for all forms of dissemination. The privilege of being the bearer of freedom of expression and freedom of press is naturally restricted by the prohibition of disseminating content contrary to certain fundamental concepts such as discrimination, incitement to hatred or support for terrorism, and is accompanied by the need to give a right of reply to anyone targeted by a publication. Such freedom is governed by certain restrictions in terms of advertising, in particular with regard to products from the world of medicine and tobacco industry. With the possibility of reaching a large audience come, especially for media financed by public money, obligations in terms of completeness and sincerity of



With the possibility of reaching a large audience come, especially for media financed by public money, obligations in terms of completeness and sincerity of information as well as pluralism and diversity of presentation of political, philosophical and religious opinions.



information as well as pluralism and diversity of presentation of political, philosophical and religious opinions. No part of the population should be excluded from access to information, which implies obligations in terms of access for people with disabilities or the different communities existing in the dissemination space.

The examples are numerous, and whilst yet to varying degrees, there always is a service provider and the consumer of the service. To go into more detail, ALIA has chosen to highlight in this annual report two specific aspects, one addressing the obligations imposed, in the interest of all consumers, to the new form of communication that are vloggers, and the other dealing with the constraints imposed on all suppliers with regard to specific consumers that are people with disabilities.

These reflections ultimately lead to questioning the relevance of an old vision opposing classical media to

the new forms of mass dissemination of information. Is there an actual point in distinguishing between a printed newspaper and a written newspaper published on the Internet? Is it necessary to differentiate a written newspaper from a television or broadcast programme? Is it relevant to submit an affirmation to a different legal regime depending on whether it is available on a linear television service or through animated images broadcast via the Internet that are accessible at any time?

These elements, together with the requirement of technological neutrality, call for a thorough reflection on the conclusions to be drawn from the convergence that can be observed between containers and contents. The coming years will be interesting, both in terms of the regulator's activity on the market and in terms of the evolution of legislation at national and European level.

Thierry Hoscheit, President



Is it relevant to submit an affirmation to a different legal regime depending on whether it is available on a linear television service or through animated images broadcast via the Internet that are accessible at any time?





02

A word from the director

Resilience alone will
not be enough for the
renowned demands
of the media place

A word from the director



Resilience alone will not be enough for the renowned demands of the media place

If resilience is a psychological concept relating to the ability of a person, a group of people or an organisation to cope with, or even overcome, in a flexible and thoughtful way, distressing, difficult and stressful situations in the workplace, then ALIA, and the women and men who work there on a daily basis, have proven to be prime examples.

After submitting its detailed opinion on the bill of law at the end of 2021, in particular with a view to the 2023 and 2024 elections and the role it would have to play in this context, the Authority started the 2022 financial year with serenity after the year-end holidays, aware of the need to progress with the priority strategic orientations determined by the Board of Directors and the Management.

Unilateral exchanges and lack of perspective(s)

In its opinion on the aforementioned bill of law, the Authority expressed its willingness and its conviction that it is necessary to extend the scope of its mission beyond the media with a public service mission only, with the help of the existing teams and the use of external service providers. Although the opinion was widely circulated as soon as December 2021, the Authority's approach received very limited support or even feedback from the political community. Since some actors did not address the subject until just before the vote of the bill, it was too late at that moment for a debate to discuss the merits of the ideas and suggestions of the Authority.

I do not hide my disappointment and that of ALIA, which, at the beginning of the year 2022, would have welcomed a lively debate on the subject; alas, this did not happen. The Chamber of Deputies thus voted a law that gives the Authority a mission, without even discussing the merits of the subjects and proposals previously put forward. A missed opportunity to do better and be prepared for possible future EU requirements in this area. Too bad,

but when we are convinced that we have the best arguments, we act as a resilient team!

The same applies at the administrative level where, at the beginning of the year 2022, the Authority hoped to finalise its transition from a still growing organisation to that of an established authority in its own right in the months leading up to its 10th anniversary at the very beginning of 2024. To reach cruising speed, ALIA must be able to develop its current missions beyond basic intervention. In particular, it is urgent to tackle the challenges of the digital age and to integrate artificial intelligence into its work methods. With a view to extending its scope of action, the Authority submitted detailed arguments in support of its budget proposals to the General Inspectorate of Finance and the Savings and Rationalisation Commission. Moreover, the Court of Auditors confirmed an exemplary and diligent budget management since 2019.

However, the Authority was denied any additional financial resources during the budget discussions in the fall of 2022 without the reasons that led the political decision-makers not to consider the Authority's requests being disclosed.

“ ALIA must be able to develop its current missions beyond basic intervention. ”



“

Discrepancy between the entrusted missions on the one hand, and the financial and human resources on the other is obvious and persistent!

”

Make up for what is missing

Today, the administrative team of the public institution ALIA has a total of 13 employees and state officials, a close-knit team, but very minimalist! And the 13 members of this team today are in charge of its missions, serving the credibility of the country's media place and its own at the European level, as well as of its purely administrative functions with a budget of a global endowment, but with an obvious and persistent discrepancy between the entrusted missions on the one hand, and the financial and human resources on the other!

While I see no better opportunity here to thank all the members of staff for their commitment and loyalty to the Authority's orientations, I very well realise that the described inadequacy cannot be allowed to continue without the risk of jeopardising a regulation and its regulator holding strong powers and essential prerogatives, involved, recognised and appreciated for its competence, its knowledge of the challenges and opportunities of the sector and for a work methodology capable of mastering the major digital issues and the challenges of a strong, open and welcoming media place.

The Authority is resilient, both in its approach and in its demands. It clearly identified its phase of stability in its current evolution. With about twenty employees who can rely on a modern media law, ALIA would be able to leave its development phase behind once and for all.

I would like to include this “wishful thinking” into the best wishes that I am extending on this occasion not only to “my team”, but also to our political leaders, current and future elected officials in this election year of 2023!

Paul H. Lorenz, Director

“

With about twenty employees who can rely on a modern media law, ALIA would be able to leave its development phase behind once and for all.

”





03

ALIA and vloggers –
competences of ALIA
and rules vloggers have
to comply with

ALIA and vloggers – competences of ALIA and rules vloggers have to comply with



Prominent vloggers seem to be those who upload content to the world-famous VSPs such as YouTube, Twitch, Instagram or TikTok.



The growing community of vloggers in Luxembourg is characterised by its important diversity and dynamism. If there is no legal definition of the word “vlogger”, it is generally accepted that a vlogger is a person who creates and animates a vlog, i.e., a type of blog using video as a main tool, and who uploads the created content, in most cases, on a video-sharing platforms (VSP). Especially among young people, prominent vloggers seem to be those who upload content to the world-famous VSPs such as YouTube, Twitch, Instagram or TikTok.

Obligations to be complied with by VSPs and vloggers

VSPs that fall under the competence of ALIA must implement various measures to ensure that the commercial communications comply with the provisions of the law of July 27, 1991 on electronic media (article 28septies). The role of ALIA is then to check whether the measures implemented by VSP providers are appropriate to achieve the desired goal.

At European level, VSPs must in particular list the specifications for commercial communications in their general terms and conditions. However, VSP providers do not have to check whether all downloaded videos comply with these specifications. It is up to the vloggers uploading the content to the VSPs to specify on each video whether the latter contains commercial communications or not. If a user informs the VSP provider about a commercial communication that is mislabelled or not identified as such, the platform provider must report the actions taken following such request to this user.

It is important to emphasise that none of the world-famous VSPs, including those listed above, falls under the competence of ALIA, which does not mean, however, that ALIA will never be competent to monitor the services offered by vloggers on said platforms.



VSPs that fall under the competence of ALIA must implement various measures to ensure that the commercial communications comply with the provisions of the law.



When does the activity of a vlogger fall under the competence of ALIA?

The missions and competence of ALIA are defined in the amended law of July 27, 1991 on electronic media. ALIA is competent to monitor the content uploaded by vloggers when they meet all the conditions to be qualified as audiovisual media service providers. The vlogger's qualification as an audiovisual media service (AMS) provider is assessed on a case-by-case basis.

It is important to note that there are different kinds of AMS, all of which are defined in the law on electronic media. The qualification that most often applies to vloggers, both abroad and in Luxembourg, is that of on-demand AMS providers.

Rules that vloggers must comply with

The rules that vloggers must comply with depend on the qualification.

The qualification of vloggers as an on-demand AMS

A vlogger is considered to be an on-demand AMS when uploading several videos to a VSP, provided that the following cumulative conditions are met:

- » 1 The (vlogger's) channel is an economic service;
- » 2 The main objective of the channel is to provide programmes that inform, entertain or educate;
- » 3 The influencer holds editorial responsibility, including effective control over the selection of programmes and their organisation;
- » 4 The offer consists of a catalogue of programmes selected by the service provider;
- » 5 The target audience of the channel is the general public;
- » 6 The programmes are broadcast via electronic communications networks;
- » 7 The service is provided by the vlogger for the viewing of programmes chosen by the user and at the user's individual request.



A vlogger who fulfils all the (cumulative) conditions provided for by directive 2010/13/EU to be qualified as an on-demand AMS is subject to the provisions applicable to all AMS, which includes, in particular, the provisions on:

- ▶ the protection of minors;
- ▶ the prohibition of incitement to violence, hatred and terrorism;
- ▶ the promotion of European works;
- ▶ The accessibility of AMS (see chapter 3 on accessibility);
- ▶ media education;
- ▶ the qualitative requirements in terms of commercial communications;
- ▶ sponsorship;
- ▶ product placement.

It should be noted that the vlogger, as a Luxembourg AMS provider intending to provide an on-demand service, must inform the Minister in charge of media no later than twenty days before the launch of the service

Rules applicable to commercial content in the videos of vloggers who meet the conditions of an on-demand AMS

The law on electronic media defines an audiovisual commercial communication as "images, combined or not with sound, *designed to promote*, directly or indirectly, *goods, services or the image of a natural or legal person carrying out an economic activity*. These images accompany or are included in a programme *against payment or other consideration*, or for self-promotion purposes. More specifically audiovisual commercial communication takes the following forms: television advertising, sponsorship, teleshopping and product placement" (article 2, paragraph 2).

It is important to emphasise that the consideration received by vloggers is not always monetary, but can take different forms (e.g., goods, gifts, payment for trips, access to events, etc.).

The way vloggers include commercial communication in their videos is as varied and creative as the content they produce. Content uploaded by vloggers is often presented as completely disinterested personal experiences, which can be a problem insofar as, in reality, it is frequently a disguised commercial communication for which the vlogger receives a consideration. Sometimes advertising content is not labelled at all or labelled in a vague and unclear way making it impossible to identify it as such.

To correctly label advertising content in their videos, vloggers must be able to identify the different forms of commercial content. The main forms are "classic" advertising, sponsorship and product placement.



It is important to emphasise that the consideration received by vloggers is not always monetary, but can take different forms (e.g., goods, gifts, payment for trips, access to events, etc.)





Content uploaded by vloggers is often presented as completely disinterested personal experiences, which can be a problem insofar as, in reality, it is frequently a disguised commercial communication for which the vlogger receives a consideration.



1) Audiovisual commercial advertising: general rules

Article 27bis of the law of July 27, 1991 on electronic media sets out the requirements to be met by audiovisual commercial communications broadcast by AMS. This article provides, among other things, that commercial communications must be “*easily recognisable as such*” and that “*clandestine commercial communications are prohibited*”. Moreover, said article prohibits any form of commercial communication relating to tobacco products, to medication and medical treatments only available by prescription. It also specifies the restrictions imposed on commercial communications relating to alcoholic beverages and various measures for the protection of minors.

Article 4 of the amended grand-ducal regulation of April 5, 2001 laying down the rules applicable to commercial communications in audiovisual media services also provides additional criteria for commercial

communications on alcoholic beverages in the field of on-demand AMS. Thus, these communications may not be, for example, specifically addressed to minors or show minors consuming alcoholic beverages.

2) Sponsorship

The grand-ducal regulation of April 5, 2001 establishes the rules applicable to commercial communications, its scope extends on the one hand to television services and on-demand AMS and, on the other hand, to audiovisual commercial communications. With regard to sponsorship, the grand-ducal regulation stipulates, among other things, that spectators “*are clearly informed*” of the existence of a sponsorship agreement by means of an identification (logo, symbol, etc.). This identification requirement is completed by the fact that the content provided can by no means be influenced, in particular by the sponsor, “*in such a way as to undermine the responsibility and editorial independence of the*

audiovisual media service provider”. In addition, sponsored AMS cannot directly encourage the purchase or rental of goods or services and be sponsored by companies the main activity of which is the manufacture or sale of tobacco products.

3) Product placement

Product placement is regulated by article 5bis of the amended grand-ducal regulation of April 5, 2001 laying down the rules applicable to commercial communications in audiovisual media services. The rules on product placement are similar to those on sponsorship. In addition to the aforementioned sponsorship rules, programmes including product placement may not promote the product in an unjustified way. In addition, programmes may not include the placement of tobacco products and medication or medical treatments available only by prescription.





The law provides for sanctions in the event that commercial communications do not meet the requirements provided for by said law. Disciplinary sanctions may take the form of a reprimand or a fine. Although law provides for this possibility, ALIA prioritises an open dialogue with vloggers falling under its competence.



How to comply with the correct labelling of commercial content?

For the correct labelling of commercial content in vloggers' videos, Luxembourg texts provide rules for:

1) Commercial communications / "classic" advertising

If the purpose of the video published by the vlogger is to encourage viewers to buy a product or service and if they are the main element of the plot, it is a "classic" advertisement that must comply with the conditions of an audiovisual commercial communication. In this case, the labelling as an "ad" or "advertisement" must be visible throughout the entire video.

2) Sponsorship

Sponsorship is less "aggressive" than "classic" advertisements due to the fact that the sponsored AMS will not directly encourage the purchase or rental of goods or services. Sponsorship implies a financial or other contribution to the content production. Viewers must be informed of the existence of a sponsorship agreement. Sponsored pro-

grammes must be clearly identified as such by the sponsor's name, logo and/or other symbol, for example by means of a reference to its products or services or a distinctive sign, and this in a way adapted to the programme, at the start, at the end or during the programme.

3) Product placement

The decisive criterion that distinguishes sponsorship from product placement is the fact that in the latter case, the reference to a product is integrated into the programme's action. On the other hand, in case of a sponsorship, the products of a sponsor can be shown during a programme, without being integrated into the action or the plot of the programme.

In terms of labelling, the vlogger must inform viewers in an unambiguous way of the existence of a product placement by means of an appropriate identification, by displaying in a corner of the image the terms "product placement" at the beginning and at the end of the programme, as well as when a programme resumes after an advertisement break to avoid confusion on the part of the viewer.

What are the consequences for vloggers not complying with the obligations in terms of commercial communications?

Article 35sexies of the law on electronic media provides for sanctions in the event that commercial communications do not meet the requirements provided for by said law. Disciplinary sanctions may take the form of a reprimand or a fine. Although law provides for this possibility, ALIA prioritises an open dialogue with vloggers falling under its competence.

Regulation of influencers' commercial communications on VSP is a constantly evolving field. At present, the role of ALIA consists above all in advising and guiding the persons as to the steps to be followed to comply with the requirements provided for by the law on electronic media.





04

Accessibility of audiovisual media services in Luxembourg

Accessibility of audiovisual media services in Luxembourg

Access to information and communication technologies is a fundamental human right. People with disabilities have the same rights as everyone else, but unfortunately, they are still too often deprived of their rights due to a lack of information of the general public regarding the needs of such people. The results are a lack of appropriate measures that would allow them to access and exercise their rights.

Article 9 of the United Nations Convention on the Rights of Persons with Disabilities provides that *“To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.”*

In June 2022, the Independent Media Authority of Luxembourg reminded all audiovisual media service providers under Luxembourg jurisdiction of their obligation, in accordance with article 27 quarter of the amended law of July 27, 1991 on electronic media, to prepare action plans on the continuous and progressive improvement of their services for people with disabilities.

On the same occasion, ALIA asked them to fill out a questionnaire, among other things, about the measures already implemented by their service(s) to make it (them) accessible to people with disabilities and about the measures they intend to put in place in the next 3 years (see “Implemented measures” below).

“When considering the accessibility of audiovisual media services in Luxembourg, it is not possible to ignore the particular linguistic situation, characterised by the practice and official recognition of three languages: Luxembourgish, French and German.”

When considering the accessibility of audiovisual media services in Luxembourg, it is not possible to ignore the particular linguistic situation, characterised by the practice and official recognition of three languages: Luxembourgish, French and German. Multilingualism has been enshrined in Luxembourg law since the mid-1980s. The law of February 24, 1984 on the language regime

recognised Luxembourgish as a language in its own right and established it as a national language. In addition, Luxembourgish, French and German are the three administrative and judicial languages. In practice, the different languages (mainly Luxembourgish, French and German) are used side by side in public and daily life in the country.



“

Many people who speak Luxembourgish as well as people with intellectual or hearing disabilities have difficulties writing and reading in Luxembourgish. It is therefore particularly difficult for providers to decide on the language of the subtitles and the audio description.

”

The main radio stations and television channels aimed at a Luxembourgish audience focus their programmes on the Luxembourgish language, but they also broadcast some of their content in French, German and sometimes English. It is also not uncommon for the participants in a show or a programme to switch from one language to another by addressing different people. At present, there are no automatic subtitle generators for the Luxembourgish language, given, among other things, that Luxembourgish is still more of a spoken than a written language. Furthermore, many people who speak Luxembourgish as well as people with intellectual or hearing disabilities have difficulties writing

and reading in Luxembourgish. It is therefore particularly difficult for providers to decide on the language of the subtitles and the audio description. The latter is a form of storytelling used to provide information about the key visual elements of a media work for blind and visually impaired consumers. As for the sign language to be used, the law of 1984 on the language regime was amended in September 2018 and the German sign language was recognised as the one of the deaf community in Luxembourg.

The unavailability of automatic subtitle generators and the need to translate Luxembourgish content into French or German before

producing subtitles and organise sign language interpretation by an interpreter who does not speak Luxembourgish contribute to increase the costs of the most common accessibility measures. They therefore often appear as an excessive financial and human resource burden for local television services in a country of 643,000 inhabitants where audience shares are very low.

“

The most common accessibility measures are often very expensive. They therefore often appear as an excessive financial and human resource burden for local television services in a country of 643,000 inhabitants where audience shares are very low.

”



“

The knowledge that media service providers have of the needs of people with disabilities and the various measures that can significantly improve the accessibility of audiovisual media services for such people is often very limited.

”

More generally, the evaluation of the questionnaire showed that the knowledge that media service providers have of the needs of people with disabilities and the various measures that can significantly improve the accessibility of audiovisual media services for such people is often very limited. However, most of them are ready to offer solutions

over the next years. To contribute to the process aimed at ensuring that media services can be used and appreciated by the widest possible audience, ALIA plans, through targeted measures such as the compilation and communication of best practices, to increase the awareness of providers for the different needs and tools available. Such tools can

be, for example, audio description, cognitive accessibility, sign language interpretation, spoken subtitles and subtitles for the deaf and hearing impaired.

“

To contribute to the process aimed at ensuring that media services can be used and appreciated by the widest possible audience, ALIA plans, through targeted measures such as the compilation and communication of best practices, to increase the awareness of providers for the different needs and tools available.

”



Implemented measures

313 of the 382 services which ALIA asked to fill out a questionnaire on their accessibility to people with disabilities provided information on the measures they have already implemented and their plans to make their services accessible to everyone.

Of the 146 services that have implemented one or more measures:

- ▶ 56 provide sign language interpretation;
- ▶ 137 provide subtitles;
- ▶ 16 provide subtitles for the hearing impaired;
- ▶ 128 provide audio description;
- ▶ 3 provide other measures, such as, for example, closed captioning.

Regarding the different types of programmes for which accessibility measures were implemented, ALIA was able to collect data from 94 services.



The main types of programmes in which accessibility measures were implemented are the following:

- ▶ daily news programmes;
- ▶ important announcements, public announcements (for Covid-19);
- ▶ press briefings;
- ▶ electoral debates;
- ▶ community programmes (educational and religious);
- ▶ international and national movies and series;
- ▶ talk shows and debates;
- ▶ sporting events;
- ▶ documentary programmes;
- ▶ live broadcast;
- ▶ events.

During the pandemic and in the context of the government's announcements addressed to the general public, some providers became aware of the importance of making services accessible to everyone, including people with disabilities.

Various initiatives testify to the will and efforts of the authorities and the media to guarantee full accessibility to information. Sign language interpretation was provided, in particular, for all government briefings about Covid-19 on *BBC News*, and *RTL BELUX* made sure to provide sign language for each press conference of the Crisis Center and the National Security Council. In Luxembourg, *RTL TV Lëtzebuerg* provides sign language in government announcements and press conferences and 100% of its news programmes are subtitled. *Hidayat TV*, for example, reported that it broadcasts 70% of news programmes and public announcements with subtitles. Although efforts are being made to make information more accessible,

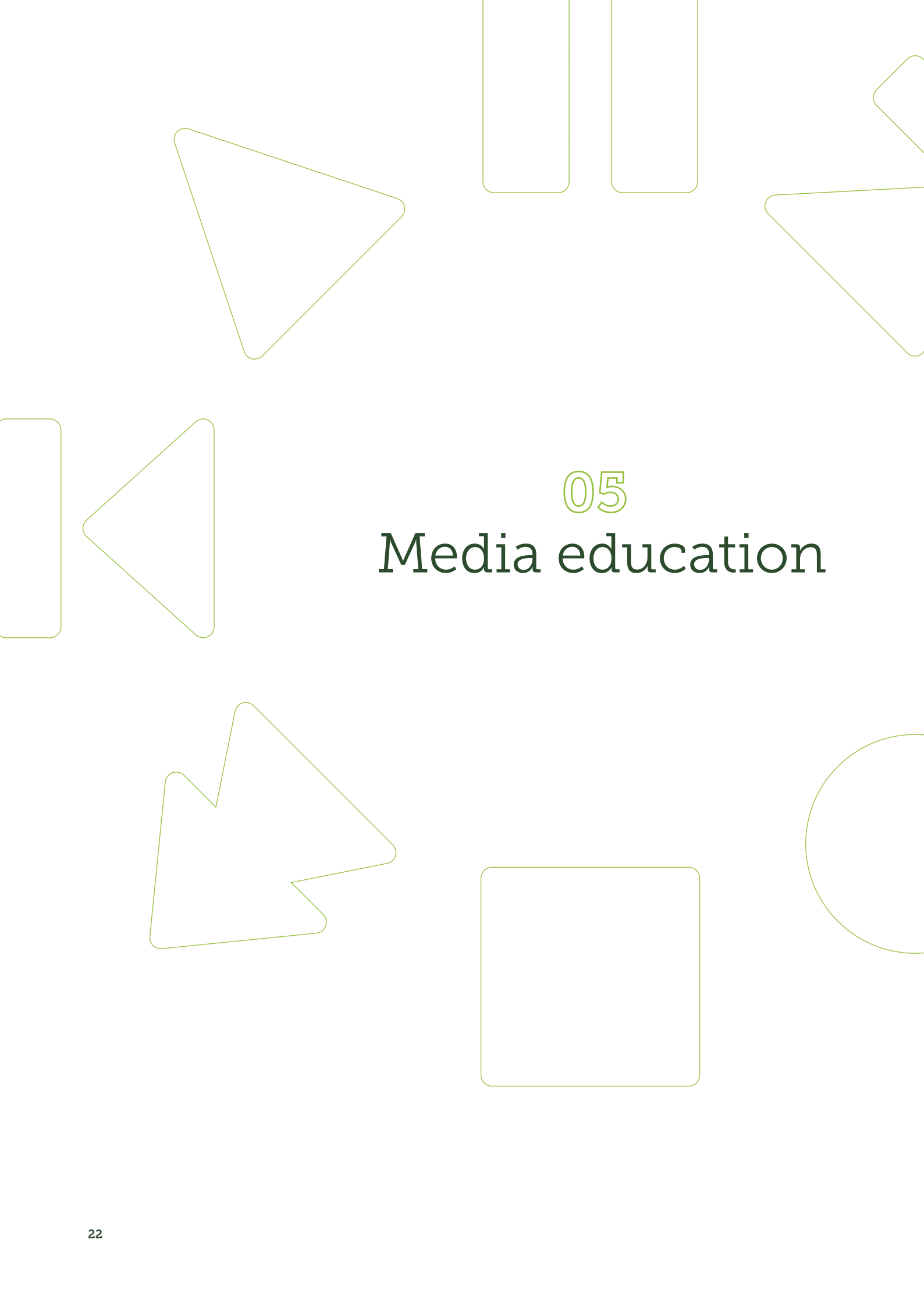
subtitling is still more commonly used for fictional content, such as movies and series. *RTL Belux*, for example, offers French subtitles for about 5,000 minutes of its fiction programmes. *Hidayat TV* offers the subtitling of 70% of its movies and series. *Talking Pictures TV* broadcasts 75% of its feature films and series with subtitles and 100% of children's television shows are subtitled. *Sky* strives to provide subtitles and audio description for as much content as possible on each channel, and for all types of programmes. The coverage of audio description on entertainment and cinema channels reaches about 30%, and on sports channels the average is about 13.5%.

Overall, it appears that audio description is not as commonly used as subtitles and that awareness of the need for a visual description is not the same as for subtitles.



During the pandemic and in the context of the government's announcements addressed to the general public, some providers became aware of the importance of making services accessible to everyone, including people with disabilities.





05

Media education

Media education

Legal context

The revised “Audiovisual Media Services” directive (AMS) introduces for the first time provisions relating to media literacy and thus strengthens its role at several levels:

- ▶ by obliging Member States to promote the development of skills related to media literacy and to take appropriate measures, as well as to report periodically to the European Commission on these actions;
- ▶ by requiring video-sharing platforms (VSP) to provide effective media education measures and tools and to make users aware of these measures and tools;
- ▶ by instructing national regulatory authorities to assess the appropriateness of the measures taken by VSP providers and to guide them in their efforts to comply with legal obligations;

- ▶ by entrusting the European Regulators Group for Audiovisual Media Services (ERGA) with the task of facilitating the exchange of experiences and good practices on the application of legal provisions on media education.

Regulation of VSP – principles of implementation

If the Authority has been entrusted with a general mission “to promote the development of media literacy for citizens of all ages in all sectors of society”, it also has a more specific mission in the field of the regulation of VSPs. The media education provisions that apply to VSPs oblige the providers of such platforms “to provide effective measures and tools for media education and to make users aware of these measures and tools”, and it is for the Authority to assess the appropriateness of the measures taken under article 28septies, paragraph 3.

Although they are part of the 10 protection measures that VSP providers are required to implement to limit the presence of harmful content uploaded to their platforms and disseminated via their services, the measures relating to media literacy differ from the other measures in two respects:

- ▶ they are not necessarily of technological type;
- ▶ they include very diverse educational programmes or activities, which can be available offline and outside the service, or even through third-party platforms.



If the Authority has been entrusted with a general mission “to promote the development of media literacy for citizens of all ages in all sectors of society”, it also has a more specific mission in the field of the regulation of VSPs.



This means that regulators in the field of media education must take into consideration and evaluate the adequacy of a wide range of different activities, that are available offline (e.g. training activities, the provision of educational resources, the organisation of awareness campaigns or events of various types by the platforms, alone or in collaboration with other stakeholders, the granting of funds to support projects of other stakeholders and/or for research purposes) and online, like technologies aimed at helping and informing users so that they can make informed, autonomous and responsible choices and have a positive and secure internet experience.

This includes more specifically:

- ▶ labelling systems (“labelling tools”) referring to the evaluations of independent information verifiers who identified certain content as false or misleading;

- ▶ notification or alert systems to encourage users, through behavioural incentives, to think about these contents before sharing them;
- ▶ “safe design” practices, for example when designing recommendation systems leading users to reliable information from official authorities, especially when it comes to topics of particular interest to the public and society or in case of crisis;
- ▶ tools allowing users to manage their well-being online.

The definition of “measures and tools” leaves a wide margin for interpretation, and represents certain challenges for providers, who, as entities specialised in the provision of online broadcasting services and in technological solutions, generally have little expertise and experience in the implementation of media edu-

cation initiatives. This interpretation margin also complicates the task of the national regulatory authorities deciding on a case-by-case basis according to the criteria defined by law, namely, among other things, the size of the platform, the type of the predominant content on the platform, the harm it could cause and the characteristics of the persons to be protected.



Regulators in the field of media education must take into consideration and evaluate the adequacy of a wide range of different activities, that are available offline [...] and online, like technologies aimed at helping and informing users so that they can make informed, autonomous and responsible choices and have a positive and secure internet experience.



Faced with the double obligation imposed on suppliers, namely the provision of effective media education measures and tools on the one hand, and on the other hand, the awareness of users of the availability of the latter, the Authority will have to focus its evaluation on two complementary levels, referring to:

- ▶ the accessibility criteria of the proposed measures and tools as, for example, their ease of use, their visibility on the platform, the provider's effort to make them available in different languages in the Member States in which its services are offered, as well as the ease of understanding the information and instructions contained therein;
- ▶ the level of transparency available to users on the implementation modalities of these measures and tools as well as on their use regarding the clarity and extent of the information provided, allowing users to understand how the platform enforces the general requirements and community directives and thus encouraging the latter to greater responsibility vis-à-vis its users.

To ensure the proper application of the measures and criteria established by law and to avoid imposing a disproportionate burden on VSPs, the Authority focused its efforts, during the first year of the regulation of VSP services, on organising consultation meetings with VSPs in Luxembourg, exchanging views with its counterparts from other European Union countries in the work groups established for this purpose and aligning its evaluation criteria with international standards.

ERGA Action Group on Media Literacy

In the context of the first action group that ERGA dedicated to media literacy, the Authority participated in an extensive consultation process, which led to the development of a toolkit ("Media Literacy Toolbox for Video-sharing Platforms"), based on six key principles, namely transparency, multi-stakeholder aspect, focus on the user/citizen, scope, evaluation and localisation. This toolkit is intended to guide VSP providers and regulatory authorities in the implementation and exercise of their obligations in terms of media education within the frame of the AMS directive. The final report prepared by the action group also contains, in the annex,

a list of best practices in media literacy of the various Member States, as well as an explanation of how these initiatives comply with the six key principles. These examples are intended to serve as a reference for VSP providers and other stakeholders in the development and implementation of their initiatives. If the toolkit developed by the action group constitutes a first proposal for a uniform set of criteria, it is now a matter of making it known to VSP providers.



ERGA Media and Information Literacy Taskforce (EMIL)

The “EMIL” taskforce, which brings together experts and practitioners in media education from different sectors, allowed regulators to discuss the provisions of the AMS directive on media education in a broader context. It also facilitated the task of collecting and supplementing existing information on the activities of online platforms in the field of media literacy as well as information on national approaches to the interpretation of provisions relating to media literacy, and it promoted the exchange of best practices in the development and implementation of media literacy activities in general.

Reinforced code of good practices against disinformation (CoP)

The Reinforced code of good practices against disinformation (CoP) offers a comprehensive self-regulatory framework and is a relevant reference tool for regulators. Commitment 17 of the Code, which obliges the 30 or so signatory platforms to promote media literacy, is of particular importance. The evaluations of the first reports the platforms must submit every six months on the measures implemented will provide important information that will help regulators to apply the provisions of the AMS directive.

First evaluations of the measures implemented by VSPs

The only VSP provider that has currently registered its services in Luxembourg - ten services in total - is a provider offering exclusively pornographic content that is likely to harm the physical, mental or moral development of minors. At the Authority's formal request, the supplier submitted a report in December 2022 on the implementation of the measures provided for in article 28septies of the law on electronic media.



Report from the Member States to the Commission on measures to promote and develop media literacy skills

As part of the first report to the European Commission on measures to promote and develop skills in media literacy, which covers the period from September 2020 to October 2022, Member States are asked to provide complete information on the measures taken to implement the requirements relating to media literacy imposed by the AMS directive, both in the audiovisual sector and at the level of general policy.

In addition to legislative and organisational measures, the information also relates to public funds and other financing mechanisms to promote media literacy, the measures and evaluation methods, as well as any type of commitment or awareness-raising action carried out at national level, in particular:

- ▶ the presence of media literacy in the curricula of educational institutions at all levels (fundamental, secondary, university or other) in the context of formal education and lifelong learning, paying attention, inter alia, to training offers for teachers as part of their initial training and/or their continuing professional education;
- ▶ all activities carried out by non-governmental actors;
- ▶ references to relevant media literacy resources made available to the public (e.g., specialised web portals).

To guarantee the topicality and completeness of the information, the Authority and the Media, Connectivity and Digital Policy Department (SMC) jointly sent a request for information to the ministries responsible for institutions offering educational

services to population groups or participating in the development of national strategies or action plans, one of the strategic axes which is aimed at the development of media education skills.

The information that the Authority will receive will allow to provide detailed answers to the information requested as part of the report to the Commission as well as to establish communication between ALIA and all the institutions concerned allowing a concerted reply to other requests of this type in the future.



Member States are asked to provide complete information on the measures taken to implement the requirements relating to media literacy imposed by the AMS directive, both in the audiovisual sector and at the level of general policy.





Having supported the creation of the Belgian-Luxembourg branch EDMO BELUX, ALIA sought to establish regular exchanges with the centre, in particular on its activities in the field of media education.



European Digital Media Observatory (EDMO)

The European Digital Media Observatory (EDMO), which started its activities in June 2020, is a multidisciplinary network bringing together fact-checkers, researchers and experts in media education. It now serves as a reference for the implementation, monitoring and evaluation of data and policies related to disinformation and media literacy. With the establishment of national and regional centres covering the entire EU (so-called “EDMO local hubs”), EDMO manages a coordinated network of experts with the mission to advise public authorities, governments and the European Commission, in particular with regard to compliance with the CoP by social media platforms, but also the Member States in the implementation of the provisions relating to media literacy introduced by the AMS directive. For them to be able to rely on EDMO’s expertise, the Commission encourages national regulatory authorities to partner with EDMO and its national and regional branches, to consult them in the exercise of their functions or, as provided in the guidelines on the

scope of Member States’ reports, “to study the possibility of setting up structured means of communication with the national branches of the European Digital Media Observatory (EDMO)”.

Having supported the creation of the Belgian-Luxembourg branch EDMO BELUX, ALIA sought to establish regular exchanges with the centre, in particular on its activities in the field of media education. In this context, the Authority collaborated with Média Animation, the media education resource centre of the French Community of Belgium, which also carries out media education activities for Luxembourg, on the collection of educational resources relating to disinformation available in Luxembourg. This collection will give an overview that will allow those responsible to select the most relevant materials and adapt or develop them according to the realities of other communities.

To strengthen the exchange of information, the Authority collaborated with EDMO as part of its efforts to map the landscape of media education in Europe by contributing to the creation of the national pro-

file for Luxembourg. It contains information on the status of media education in Luxembourg, national strategies aimed at the promotion and development of skills related to media education, its presence in national curricula, its role outside formal education, an overview of the main actors in the field as well as the media education activities of the Belgian-Luxembourg centre EDMO BELUX.



The Authority collaborated with EDMO as part of its efforts to map the landscape of media education in Europe by contributing to the creation of the national profile for Luxembourg.



Citizenship education day

As part of the citizenship education day, organised annually by the Zentrum für politische Bildung (ZpB), the Authority joined forces with the centre to organise an exchange between the actors of media education on the subject “Media education against fake news?”. The participants, including the National Agency for Youth Information (Agence Nationale pour l'Information des Jeunes - ANIJ), BEE SECURE, Graffiti - d'Jugendsendungen um Radio ARA, Klaro - Centre officiel du langage facile au Luxembourg, Erwuessebildung, RESPECT.LU – Centre contre la Radicalisation Luxembourg, RTL/EDMO BELUX, SCRIPT and the National Youth Service (Service National de la Jeunesse - SNJ), presented their activities in the field and discussed different approaches to address the subject of disinformation.

“Media & Me - Backstage bei Medienberufen”

For the sixth edition of the cross-border media project “Media & Me”, which ALIA supported for two years as a financial contributor before participating as an active partner, the Authority welcomed in June 2022 a group of 15 young people from the Greater Region, aged between 15 and 26, so they could discover the missions of a national regulatory authority in the media ecosystem. After an introduction to the legal aspects of the Authority's work, the young people had the opportunity to analyse examples of audiovisual material reported to the Authority. During practical workshops, they discussed together the grievances raised by the complainants, potential violations of the rules or possible failures of the supplier, as well as considerations that could have guided the Board of Directors in its decision-making.

Pan European Game Information (PEGI)

As a member since 2014, the Authority participated in December 2022 in the annual meeting of the Council of Pan European Game Information (PEGI), which took place this time in Amsterdam. Discussions focused on current phenomena in the gaming industry such as in-app purchases, “loot boxes” (virtual objects, usually presented in the form of boxes), the MetaVerse and the approaches of different countries to deal with them. In the context of a more restrictive regulatory framework with the entry into force of the “Digital Services Act” (DSA) and other large-scale policies for the protection of minors, consumer protection and commercial law, PEGI presented draft projects aimed at amending its Code of Conduct, which were discussed by the PEGI Board.





06

Review of monitoring and regulation of electronic media services

Review of monitoring and regulation of electronic media services



As the supervisory body for programmes, the Authority handles complaints from listeners and viewers and complaint files submitted by foreign authorities relating to services under its supervision. In addition, it can deal with various issues such as the protection of minors, human dignity, commercial communications or even political opinion polls.



ALIA is in charge of monitoring the application of regulatory and legislative texts, both national and European, by audiovisual media service providers (AMS) insofar as the content of their programmes is concerned.

As the supervisory body for programmes, the Authority handles complaints from listeners and viewers and complaint files submitted by foreign authorities relating to services under its supervision. In addition, it can deal with various issues such

as the protection of minors, human dignity, commercial communications or even political opinion polls. In the monitoring field, it always intervenes a posteriori. Its task in this field is aimed at linear services (conventional television), non-linear services (video on demand, VOD), national, regional and local radios, the classification of cinematographic works and video-sharing platforms (VSPs), the latter only with regard to the assessment of the appropriateness of the measures taken by VSPs pursuant to article 28septies, paragraph 3.

Measures are, among other things, aimed at protecting minors from programmes and videos available on VSPs.

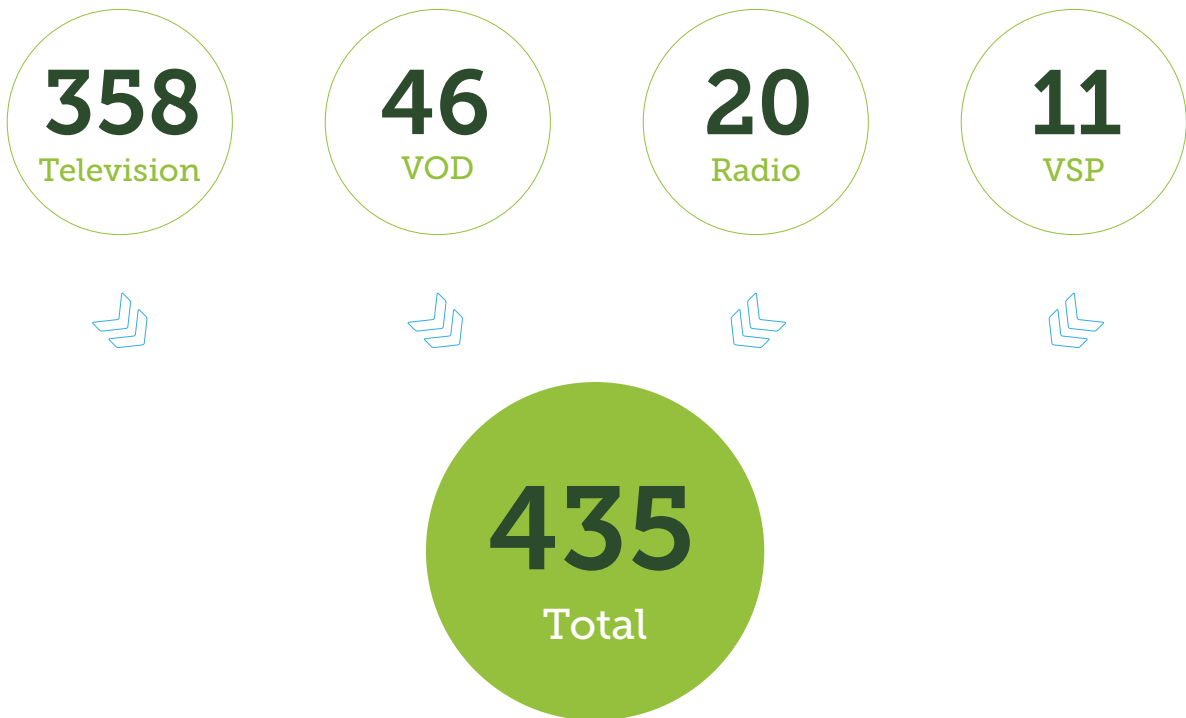
As the regulator of SMAs, ALIA also takes decisions and gives opinions on any issues or bill of law related to its missions. The Authority decides in particular on requests for the granting and renewal of concessions and permissions for broadcasting services, or even on requests for the modification of the specifications of concessions and permissions. .



As the regulator of SMAs, ALIA also takes decisions and gives opinions on any issues or bill of law related to its missions.



Number of audiovisual media services, radio and VSP



» 61 new registrations / concessions

» 26 broadcast stops





The issue of the protection of minors remains a major concern of the Authority. Thus, ALIA analysed several complaints following the broadcast of programme elements that the complainants considered not to be appropriate for the young public.



Programme monitoring

In 2022, the Authority issued 6 decisions as part of its programme monitoring mission.

Protection of minors

The issue of the protection of minors remains a major concern of the Authority. Thus, ALIA analysed several complaints following the broadcast of programme elements that the complainants considered not to be appropriate for the young public.

Content classification in the different age categories by providers

In a decision against the television service *.dok den oppene Kanal*, the Authority decided on the age classification of a music video clip broadcast by the provider. An individual filed a complaint with ALIA alleging that the television service violated the regulations on the protection of minors by broadcasting the music video at an early hour.

As part of the investigation, the Director sought the opinion of ALIA's Advisory committee that must be consulted in the context of any complaint or investigation upon ALIA's own initiative relating to the protection of minors. The latter retained that a clip of this type should be accompanied

by adequate signage. Given the vulgar, even aggressive, words and violent images, the director considered that the programme should have been classified in the age category III (not recommended for children under 12 years old) and not in the category I (general public). The Board of Directors of the Authority partly followed the conclusions of the investigation and thus held that the content of the clip is not appropriate for distribution "to the general public" and that it is not recommended for minors under 10 years of age. The Board decided to impose a monetary penalty of 500.- Euro to the S.A. *.dok* (decision n° 8/2022).

Commercial communications Clear, important and serious violation of good morals

The Serbian media regulatory authority sent a complaint file to ALIA relating to the broadcast of an advertising spot for the online sports betting service *BetOle*. The commercial in question featured an actor wearing successively an SS uniform and a military helmet of the national socialist ideology organisation.

Pursuant to the investigation, the director of ALIA held that by broadcasting this commercial, the supplier clearly failed to comply with the obligation of "good morals". The Advisory committee, for its part, concluded

that this was not an act of incitement to hatred as such, but it recommended warning the supplier about the use of prohibited badges and recalled the importance of respect for fundamental and human rights.

In the same line as the director, the Board of Directors of ALIA held that the supplier manifestly ignored in an important and serious way its obligation to comply with good morals included in the specifications of the service *SportKlub 1*. The Board noted in its decision that "*a de-demonization of Nazi ideology by staging jokes on such a serious subject testifies, in the eyes of the Board, to a highly reprehensible lack of sensitivity on the part of its author*". Therefore, the Board decided to impose a fine of 1 500.- Euro against the supplier (decision n° 4/2022).



Undisclosed sponsorship

In a case against the supplier *.dok*, the Authority was seized with a complaint that a sponsored show “Automotoshow - by Carlo Miller” was not reported as such. During an interview with ALIA, the supplier stated, with supporting documents, that the car presented in the show was made available for a test show and that it was collected and subsequently returned to the dealer. The supplier also clarified that there was no economic, contractual or partnership link between the parties. Based on these elements, the Board held that there was no sponsorship or other form of commercial communication that had not been disclosed in an appropriate way (decision n° 1/2022).

Clandestine commercial communications

The Authority carried out an investigation on its own initiative against Post Telecom S.A., provider of the service *Théid & Co* available on the VOD platform of POST TV. In one of the episodes of the show, the actor uses a bottle of beer of the brand “Corona” to make a comparison with the vaccine against the COVID-19 virus. Moreover, in other episodes,

the “Post” brand and logo are omnipresent. The director of ALIA was of the opinion that the supplier had violated the rules on commercial communications, insofar as the presentation of the beer bottle was excessive and the display of the logo and the brand “Post” was, for its part, not only excessive, but also repetitive.

Regarding the visual presentation of the brand “Corona”, the Board of Directors decided that the supplier had not violated the rules on commercial communications insofar as, on the one hand, the objective of the display was not to encourage the purchase of the product and, on the other hand, the appearance of the brand did not seem disproportionate.

Regarding the visual presentation of the brand “Post”, the Board retained the qualification of self-promotion within the meaning of article 2, paragraphs 2 and 12 of the law on electronic media. As regards the clandestine type of the commercial communications, the Board considered that the advertising intention on the part of the supplier was proven since the presence of the brand was repetitive, excessive and had a promotional character. However,

the advertising messages were not identified as such; therefore, the Board decided that the supplier had manifestly, importantly and seriously violated the rules on clandestine commercial communications and pronounced a blame against the supplier (decision n° 7/2022).

Other topics

Application of the law of the forum – pre-election contents

In a decision of April 25, 2022, the Authority ruled on “pre-election content” transmitted by the service provider *Nova S*. The Serbian regulator submitted a complaint file to the Board of Directors alleging that the content broadcast was incompatible with the Serbian regulations on the respect of pre-election silence.

The Board noted that, to the extent that the service *Nova S* falls within the competence of ALIA, Luxembourg rules are applicable to the broadcasting of these programmes. It turned out that the issue raised by the Serbian regulator is not the subject of any rules that the supplier may have to apply in accordance with Luxembourg law. The complaint was therefore inadmissible and the case was closed (decision n° 6/2022).



Principle of non-discrimination

The Authority carried out an investigation on its own initiative against Post Telecom S.A., provider of the service *Théid & Co* available on the VOD platform of *POST TV*. In his analysis, the director notes that the character “Schlappeking” had a pronunciation defect, called lisping, which would ridicule people with a speech impediment. A second character called “Pöjemöpp” was presented as a homosexual person with very effeminate features. In this case, the director considered that the supplier had violated the current rules on non-discrimination.

The Board of Directors concluded that, in the end, it was not competent to decide on the complaint regarding an alleged violation of the principle of non-discrimination, insofar as the principle of non-discrimination mentioned in article 1 of the law on electronic media is not covered by paragraph 3 of article 35sexies of said law, which lists the provisions of the law on the basis of which the Authority can pronounce a disciplinary sanction (decision n° 7/2022).

The principle of respect of human dignity and the prohibition of incitement to hatred

The Serbian media regulatory authority submitted a complaint file to ALIA regarding the show “Good, bad, evil”, a show with humorous/satirical content in the form of open discussion between the guests, broadcast by the service provider *NOVA S*. The Serbian regulator alleged that the programme element contained hate speech against the Serbian president and other high-ranking Serbian politicians.

The ALIA Advisory committee considered that the comments made during the broadcast could not be qualified as incitement to hatred, discriminatory or as undermining the dignity of these politicians. The director noted that “(...) *the words conveyed by the presenters are unflattering and not devoid of personal judgments, (...)*”, but he added that “*politicians would be subject to a high degree of tolerance with regard to open criticism*”. He therefore concluded that none of the provisions relating to the prohibition of

incitement to hatred or respect of human dignity had been violated.

The Board of Directors, meanwhile, urged the supplier to avoid the dissemination of expressions that are “*seriously and gratuitously offensive*”. However, it decided to dismiss the case insofar as the offending programme element did not allow to retain a characterised ignorance of human dignity or prohibition of incitement to hatred (decision n° 11/2022).



Regulatory missions

Decisions Specifications

In addition to monitoring compliance with the specifications by suppliers who have a Luxembourg concession or permission, ALIA must be informed in advance of any modification of the data on the basis of which permission for a local or broadcast network radio service was issued. Such modification of data may not be effective regarding the permission without the prior and express consent of the Authority.

Non-compliance with the specifications

The Board of Directors of ALIA carried out an investigation on its own initiative against the public limited company *Radiolux*, provider of the service *L'Essentiel Radio*, regarding a potential violation of the radio specifications.

In this case, the Authority had been warned that share sales between the shareholders of the limited company had taken place at the beginning of 2022. It turned out that during the procedure there were also changes with *Radiolux* both at

the level of the composition of the board of directors and at the level of the people in charge of day-to-day management. However, these changes had not been the subject of a request for prior authorisation from the Authority, while article 18 of the specifications clearly states that “*any modification of data based on which the permission was granted, in particular with regard to the composition of the management and management bodies, the distribution of the shares of the beneficiary company [...] cannot have any effect with respect to the permission without the prior express consent of the Authority*”. As a consequence of the obvious, important and serious violation of a provision of the specifications of *L'Essentiel Radio*, the Board decided to impose a fine of 1,000.- Euro against the S.A. *Radiolux* (decision n° 16/2022).

Modification of specifications

The Authority decided to grant eight requests for the modification of specifications.

The applications were submitted by the *Société Européenne de Communication Sociale* s.à r.l., a.s.b.l. *Association pour la création et l'exploitation d'émissions*

radiophoniques par antenne et par câbles, a.s.b.l. *Country Radio Gilsdorf*, a.s.b.l. *Centre d'accueil universel*, a.s.b.l. *Radio locale Réiserbann-Beetebuerg* as well as S.A. *Radiolux*.

These were changes at the level of the registered office, the corporate bodies, the name, the programme schedule, the auditor, the airtime, the composition of the board of directors and the daily management of the various companies and associations.



ALIA must be informed in advance of any modification of the data on the basis of which permission for a local or broadcast network radio service was issued.



Failure to pay the fixed annual monitoring fee

In November 2021, the Authority's Board of Directors decided to instruct the director to open an investigation against the service *A1 TV* for non-payment of the fixed annual monitoring fee. In accordance with article 1 of the modified grand-ducal regulation of February 2, 2015 fixing the amount and the payment methods of the fees to be collected by ALIA in monitoring matters, “*the audiovisual media service provider established in Luxembourg whose service is subject to the monitoring of the Autorité luxembourgeoise indépendante de l’audiovisuel [...] must pay a fixed annual fee in the amount of 2,000 [...] Euro*”. Said fee is due for each service registered in accordance with the law on electronic media. The registration of the service *A1 TV* was actually made with the Media and Communications Department (Service des Médias et des Communications - SMC) on April 21st, 2021 by *Future Media Network Ltd*.

After numerous warnings and knowing that the failure to pay the monitoring fee constitutes a violation that is subject sanctions, the Board concluded that “*by broadcasting the A1 TV programme without paying*

the monitoring fee due for the year 2021, the service provider clearly, importantly and seriously violated the provisions” of the law on electronic media. Therefore, the company *Future Media Network Ltd* was ordered to pay a fine of 1,500.- Euro (decision n° 2/2022).

Lack of registration of an on-demand audiovisual media service

The Authority found that *BasTV* broadcast audiovisual content via the website *bastv.lu*. In this context, the director sent a letter to the editorial manager informing him that the proposed service fulfilled the conditions to be qualified as an on-demand audiovisual media service within the meaning of the law on electronic media. During an interview, the director reminded the editorial manager that the service was subject to the obligation to be registered in accordance with the law on electronic media.

A few months after the interview, the service had still not been registered. The Board concluded that there was a clear, important and serious violation of the provisions of the law on electronic media and issued a reprimand against the service provider (decision n° 5/2022).

Advisory opinions

In 2022, the Authority issued 53 advisory opinions on various topics. Most of the opinions related to requests for the granting and renewal of concessions or permissions for audiovisual media services. In addition, the Authority may give its opinion on any other issue related to the regulation of audiovisual media services should it deem necessary.



Most of the opinions related to requests for the granting and renewal of concessions or permissions for audiovisual media services. In addition, the Authority may give its opinion on any other issue related to the regulation of audiovisual media services should it deem necessary.



Draft modification of the amended grand-ducal regulation of February 2, 2015 fixing the amount and payment methods of fees to be collected by ALIA

In its opinion the Authority draw the attention of the authors of the draft to the fact that the new wording of article 1 would lead to exempting all service providers established outside Luxembourg from paying the fee. In doing so, the draft grand-ducal regulation departs from the text of the law, which establishes the scope of competence of the Authority on audiovisual or sound media services that fall under the competence of the Luxembourg authorities in application of the amended law of July 27, 1991 on electronic media and which makes no reference to the need for SMAs to be established in Luxembourg.

Moreover, in its opinion, the Authority welcomed the extension of the obligation to pay the fees to VSP services and supported the draft grand-ducal regulation in that it proposes to exempt from the payment of the fee all providers offering non-commercial services, and in particular natural persons or entities not working in a

commercial capacity or even those providing distribution on an exceptional or occasional basis.

Bill of law establishing the public institution "média de service public 100,7" and amending the amended law of 27 July 1991 on electronic media

In line with its opinion n° 1/2021 the Authority emphasises the importance of a clear and precise delimitation of the missions of the various actors (board of directors and director general). In this case, the Authority fears "*an unjustified interference by the Board of directors in the daily activity of the radio*", if accepting an extensive reading of the draft suggesting that the board of directors has the power to decide on the details of the programme schedule.

According to ALIA, the scope of approval by the board of directors should be limited to a general or strategic orientation of the programmes; this would grant the management and the editor-in-chief a certain margin in their tasks (decision n° 3/2022).

The deployment of DAB+ in Luxembourg

The deployment of DAB+ remains a topical issue in Luxembourg on which ALIA was called upon to issue an opinion. ALIA expresses its doubts about the diversification of the offer highlighted by the draft grand-ducal regulation and reiterates the elements already developed in its opinion n° 7/2021 noting that it advocates an "all or nothing" policy.

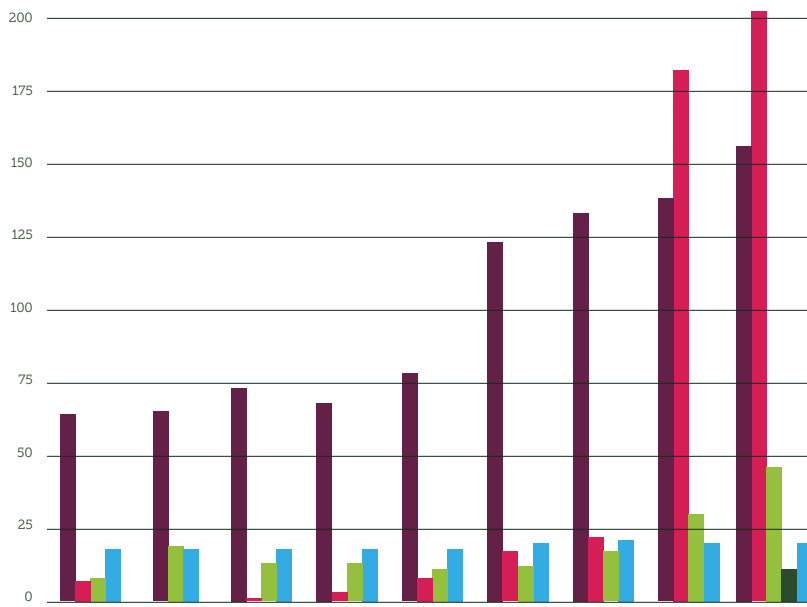
In this sense, ALIA wants the available resources to be fully used "*through the commissioning of the two multiplexes that are available or else skip the DAB + step to start a study on the deployment of 5G as soon as possible*". The Authority fears that the commissioning of a single multiplex will lead to the consequence that only part of the existing radio offers will be available on DAB + to the detriment of local radios. It adds furthermore that "*the order of priority established in the aforementioned law will not guarantee a fair treatment of all the services potentially in contention*", thus endangering the plurality of the media (opinion n° 5/2022).

All opinions and decisions rendered by the ALIA are available on the website

www.alia.lu



Evolution of the number of services monitored by ALIA since 2014



	2014	2015	2016	2017	2018	2019	2020	2021	2022
Luxembourg television services	64	65	73	68	78	123	133	138	156
Services falling within the competence of Luxembourg through the use of a Luxembourg uplink or a Luxembourg satellite*	7	0	1	3	8	17	22	182	202
On-demand audiovisual media services	8	19	13	13	11	12	17	30	46
Video sharing platform service (VSP)**	0	0	0	0	0	0	0	0	11
Radio services	18	18	18	18	18	20	21	20	20

The sharp increase in the number of services under Luxembourg's jurisdiction is due to the withdrawal of the United Kingdom from the European Union. The United Kingdom's exit from the European Economic Area had the consequence of making the Grand Duchy of Luxembourg competent for all audiovisual media service providers using a Luxembourg uplink or a Luxembourg satellite, which were then

established in the United Kingdom. Indeed, in accordance with article 23quater of the amended law of July 27, 1991 on electronic media, audiovisual media services transmitted by a provider who is not established in a Member State of the European Economic Area, but who uses a Luxembourg uplink or a Luxembourg satellite, is deemed to fall under the jurisdiction of the Grand Duchy of Luxembourg.

The increase in the number of VSP providers is explained by the adoption of directive (EU) 2018/1808. This directive amended and updated the directive on audiovisual media services by extending certain rules to video sharing platforms. The law of February 26, 2021 amending the amended law of July 27, 1991 on electronic media and transposing directive (EU) 2018/1808 entered into force on March 12, 2021.



Statistics

Decisions



Details of decisions

	Decisions rendered following one or several complaints	Decisions rendered following an investigation upon the initiative of the Authority	Decisions rendered as a result of a request	Decisions rendered as a result of an ex gratia appeal
Supervision	5	1	/	/
Regulation	/	3	8	/

Advisory opinions



Details of complaints¹

Complaint topics	Complaints received in 2022	Complaints processed in 2022	Decisions based on complaints postponed to 2022
Complaint topics	1	2	2
Commercial communications	1	2	2
Protection of minors	2	1	/
Human dignity	/	1	1
Other	1	1	/

¹ The difference between the complaints processed and the complaints received is due to the fact that most of the cases handled by ALIA in 2022 related to complaints received in 2021 or in previous years. It should be noted that a single decision can deal with several complaints. It should also be noted that a single complaint can concern several subjects.



Advisory committee

When investigating a complaint or acting upon its own initiative regarding the protection of minors as well as incitement to hatred based on race, sex, opinion, religion or nationality,

the Advisory committee must be consulted both for radio and television services and for cinematographic works. By decision of the Authority's Board of Directors, the committee may also be consulted in the context of its other functions.

In the year 2022, the advisory body had 7 plenary meetings discussing 3 opinions in the field of the protection of minors and incitement to violence or hatred based on race, sex, opinion, religion or nationality.

Sanctions imposed in 2022



» 2

Reprimands

» /

Reprimands with mandatory reading of a statement on air

» 4

Fines



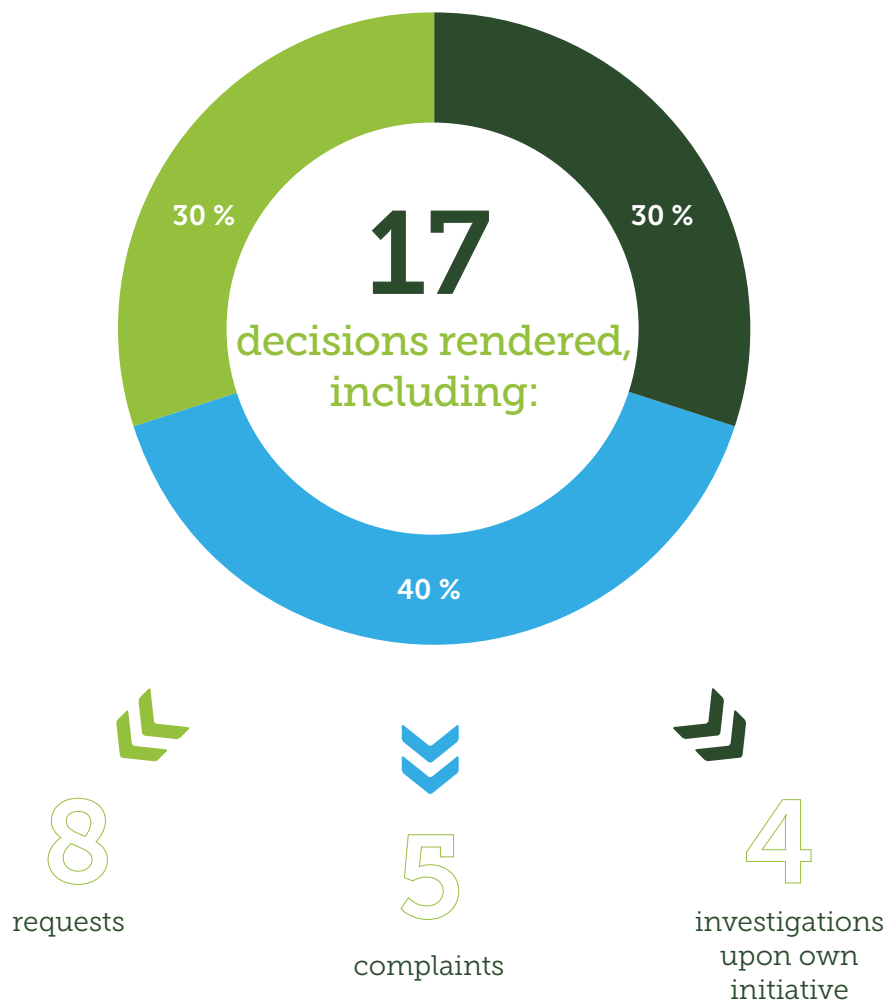
Summary of the year 2022

1. Décisions

1	10/01/2022	Automotoshow – by Carlo Miller	.dok	Complaint 2020	Commercial communications	TV	Supervision
2	24/01/2022	Future Media Networks Ltd	A1 TV	Investigation upon own initiative 2021	Miscellaneous (fee payment)	TV	Regulation
3	28/02/2022	Radio Latina		Request 2022	Specifications	Radio	Regulation
4	14/03/2022	BetOle	SportKlub 1 (version serbe)	Complaint 2021	Commercial communications Incitement to hatred Discrimination	TV	Supervision
5	14/03/2022	BasTV	BasTV	Investigation upon own initiative 2021	Miscellaneous (no registration)	VOD	Regulation
6	25/04/2022	Inter nos	Nova S	Complaint 2022	Miscellaneous (pre-election content)	TV	Supervision
7	16/05/2022	Théid&co	VOD POST TV	Investigation upon own initiative 2021	Commercial communications	VOD	Supervision
8	11/07/2022	40 Gvang Secteur BR2 ft. Ljay (émission "Tonrausch local music videos")	.dok	Complaint 2022	Protection of minors	TV	Supervision
9	19/09/2022	Radio Lora		Request 2022	Specifications	Radio	Regulation
10	10/10/2022	Country Radio Gilsdorf		Request 2022	Specifications	Radio	Regulation
11	24/10/2022	Good, bad, evil	Nova S	Complaint 2022	Human dignity Incitement to hatred	TV	Supervision
12	14/11/2022	Radio Latina		Request 2022	Specifications	Radio	Regulation
13	30/11/2022	Radio Latina		Request 2022	Specifications	Radio	Regulation
14	30/11/2022	Radio Positiva		Request 2022	Specifications	Radio	Regulation
15	12/12/2022	Radio LRB		Request 2022	Specifications	Radio	Regulation
16	12/12/2022	L'Essentiel Radio		Investigation upon own initiative 2022	Miscellaneous (change in shareholding)	Radio	Regulation
17	12/12/2022	L'Essentiel Radio		Request 2022	Specifications	Radio	Regulation



2. Statistics (as of 10/20/2022):



Type of service:



3. Opinions

1	21/02/2022	Draft grand-ducal regulation amending the amended grand-ducal regulation of February 2, 2015 fixing the amount and payment methods of fees to be collected by the Autorité luxembourgeoise indépendante de l'audiovisuel in terms of supervision of audiovisual and sound media services
2	25/04/2022	Request by the S.à r.l. Canal+ Luxembourg for the granting of four concessions for Luxembourg satellite television services
3	16/05/2022	Bill of law establishing the public institution “média de service public 100,7” and amending the amended law of 27 July 1991 on electronic media
4	27/06/2022	Transfer of twelve concessions to the company RTL Nederland Media Services S.A. & Cie S.C.S. for the continuation of broadcasting Luxembourg services
5	27/06/2022	Draft grand-ducal regulation <ol style="list-style-type: none"> 1. on the modalities for determining the network operator and the modalities for granting authorisation to broadcast in digital multiplex; 2. determining the modalities for granting permissions for audio radio services broadcast in digital multiplex as well as the general rules governing these permissions and the specifications attached to them; and 3. amending the amended grand-ducal regulation of July 28, 2014 establishing the list of Luxembourg broadcasting frequencies referred to in article 4 of the amended law of July 27, 1991 on the electronic media
6	27/06/2022	Request by the S.à r.l. Canal+ Luxembourg for the granting of four concessions for Luxembourg satellite television services
7	11/07/2022	Transfer of twelve concessions to the company RTL Nederland Media Services S.A. & Cie S.C.S. for the continuation of broadcasting Luxembourg services
8	11/07/2022	Requests for opinions concerning 1° 4 concessions to be granted to Canal+ Luxembourg s.à r.l. for “Canal+ Sport” and 2° 4 concessions to be granted to Canal+ Luxembourg s.à r.l. for “Canal+ Action”
9	11/07/2022	Request by S.à r.l. Network4 Media Group for the granting of a concession for the Luxembourg satellite television service “Match4”
10	10/10/2022	Request by the S.à r.l. Canal + Luxembourg for the granting of a concession for the Luxembourg satellite television services “Canal+ Sport 2”
11	24/10/2022	Request by the municipal administration of Diekirch for the granting of a concession for the Luxembourg television service “Diekirch Infokanal”



3. Opinions

12	24/10/2022	Request by the S.à r.l. MCS Group for the granting of a concession for the Luxembourg satellite television service “MCS Extrême”
13	24/10/2022	Request by the S.à r.l. Network4 Media Group for the granting of a concession for the Luxembourg television service “Max4”
14	24/10/2022	Renewal of the concession for the Luxembourg satellite service “Altice Studio” of the S.A. Altice Entertainment News & Sports
15	24/10/2022	Renewal of the concession for the Luxembourg satellite service “Skylink 7” (Czech and Slovak version) of the S.à r.l. Canal+ Luxembourg
16	24/10/2022	Renewal of the concession for the Luxembourg satellite service “.dok den oppene Kanal” from the S.A. DOK
17	24/10/2022	Renewal of the concession for the Luxembourg satellite service “Kanal 3” of the a.s.b.l. Luxembourg Movie Production
18	24/10/2022	Renewal of the concession for the Luxembourg satellite service “Nordlicht” of the a.s.b.l. Nordlicht TV
19	24/10/2022	Renewal of the concession for the Luxembourg satellite service “Euro D” of the S.A. Osmose Media
20	24/10/2022	Renewal of the concession for the Luxembourg satellite service “Uelzechtkanal” of the a.s.b.l. Uelzechtkanal
21-22	24/10/2022	Renewal of the concession for the Luxembourg satellite service “Golfchannel” / “Lucky Jack” (French version) of the S.A. Mediawan Lux
23-50	24/10/2022	Renewal of 28 concessions for Luxembourg services of the S.à r.l. United Media
51	14/11/2022	Request by the S.à r.l. United Media for the granting of two concessions for the Luxembourg television service “Nova Max”
52	14/11/2022	Request by the S.à r.l. United Media for the granting of two concessions for the Luxembourg television service “Nova Series”
53	19/11/2022	Granting of a concession to the municipal administration of Steinsel for a television service “Kanal 3”





07

European affairs and international relations

European affairs and international relations

ALIA is actively involved in European and international cooperation. Since its creation in 2014, it has been a member of several cooperation bodies, including:



ERGA

European Regulators Group for Audiovisual Media Services

The Authority also attends the meetings of the Contact Committee for the “Audiovisual Media Services” directive (AMS directive), which is chaired by the European Commission.

In 2022, ALIA continued to strengthen its participation in European regulatory bodies, in particular in ERGA. The Authority contributed to the reflection on the implementation of European legislation and put forward its position and its observations on the development of new legislative proposals. In addition, the Authority actively participated in the work of the other networks of regulators of which it is a member, such as EPRA and REFRAM, where ALIA participated in exchanges of views to strengthen cooperation between regulators at the international level.



EPRA

European Platform of Regulatory Authorities

European affairs

The evolution of the European legislative framework

2022 was a crucial year for the development of the European media framework. As the European Commission already announced in 2021, it presented a proposal for a regulation on media freedom (European Media Freedom Act, EMFA) to preserve media freedom and pluralism on the European media market. In addition, the legislative package on digital services, including in particular the Digital Services Act (DSA) and the Digital Markets Act (DMA), entered into force in 2022, introducing for the first time a set of common rules on the obligations of intermediaries throughout the single market, while guaranteeing a high level of protection for all users.



REFRAM

French-speaking network of media regulators

Finally, the regulation on transparency and targeting of political advertising, presented by the European Commission in November 2021, has been the subject of many debates, as has the AMS directive, the implementation of which continues to be the subject of discussions between European regulators, in particular since its revision in 2018.

European legislation on media freedom - Proposal for regulation and recommendation

Free media are an essential pillar of any democracy and are essential to a healthy market economy. On a global scale, the European Union remains a bastion of media freedom and is a reference figure as a democratic continent. However, we are observing increasingly worrying trends. In this context, in September



2022 the European Commission presented a draft European legislation on media freedom, to complement the existing measures relating to the audiovisual market, the EMFA. According to the legislative procedure, the Council began examining the Commission's proposal in September 2022, while in the European Parliament, the proposal entered a preparatory phase.

The EMFA constitutes a new set of rules aimed at protecting the freedom, pluralism and independence of the media as well as ensuring the proper functioning of the internal

media market in the EU. The proposed regulation emphasises the independence and sound financing of public service media and includes guarantees against political interference in editorial decisions and surveillance. It aims at transparency of media ownership and the attribution of public advertising and also provides for measures to protect the independence of editors. Finally, the regulation will create a new independent European Committee for media services, which will replace the Group of European regulators for audiovisual media services (ERGA). The Committee will promote the effective and coherent application of the EU legislative framework on media, in particular by assisting the Commission in preparing guidelines on regulatory issues regarding media. In addition, the Committee will coordinate national regulatory measures for non-European media that pose a risk to public safety, to prevent these media from circumventing the rules applicable in the EU. The Committee will also organise a structured dialogue between the very large online platforms and the media sector to promote access to diversified media offers. ALIA will represent Luxembourg on this Committee composed of national media authorities. Moreover, ALIA, like ERGA as a whole, closely followed the evolution of the legislative process and shared its opinion in the form of a position statement supporting the initiative, but at the

same time calling for the effective independence of the new Committee.

That said, the Committee must do more than assist the Commission and must be able to act on its own initiative as well as have the power to manage its own internal affairs independently. In the same vein and given that the effective independence of the Committee is linked to the operational organisation, ERGA requests a secretariat functioning separately from the Commission. Finally, it is crucial that the future council and all its members are equipped with adequate human and financial resources to carry out all their new tasks and correctly apply the new rules.

The legislative package on digital services

Announced as one of the priorities of the Von der Leyen Commission in 2019, the topic of the regulation of digital platforms continues to occupy the top of the European agenda in 2022. Following the publication of two new regulation proposals by the European Commission in 2020, the DSA and the DMA, inter-institutional negotiations, known as “trilogues”, started beginning of January 2022 and resulted in a political agreement in the first half of 2022. In this context, ERGA published its position paper on the DSA in March 2022, to which ALIA contributed by representing the interests of Luxembourg.



The EMFA constitutes a new set of rules aimed at protecting the freedom, pluralism and independence of the media as well as ensuring the proper functioning of the internal media market in the EU.





Implementing the modernisation of the current legal framework, these two legislations aim to create a safer and more open digital space in which the fundamental rights of users are protected and fair competition conditions for companies are met.



Implementing the modernisation of the current legal framework, these two legislations aim to create a safer and more open digital space in which the fundamental rights of users are protected and fair competition conditions for companies are met.

Recognising that online platforms have become integral parts of our daily lives, the DSA establishes rules to assign greater responsibility for how platforms moderate content, broadcast ads and use algorithmic processes. Under these new rules, users can report illegal content and have clear means to challenge the content moderation by the platforms. Given the particular impact of very large online platforms on our economy and our society, the DSA sets a higher standard of transparency and accountability regarding the way in which the providers of these platforms share information. Thus, platforms are required to assess the risks that their systems, with regard not only to illegal content and products but also systematic risks for the protection of public interests, fundamental rights, public health and public safety. They will have to develop appropriate risk management tools and measures to protect the integrity of their services against the use of manipulation techniques.

The DMA aims to ensure that the markets in which online platforms operate remain fair, competitive and accessible for innovative compa-

nies. In this perspective, the DMA introduces rules for platforms acting as “access controllers”. Specifically, these access controllers must ensure that end users can easily unsubscribe from the platform's services or uninstall the platform's pre-installed services, prevent the installation of default software, provide data on advertising performance and information on advertising pricing or allow developers to use alternative payment systems integrated into applications.

Audiovisual and media services

The AMS directive aims at the coordination, at the level of the European Union, of national legislation applicable to all audiovisual media, in this case traditional so-called linear television programmes, on-demand services and, since its revision in 2018, video sharing platforms (VSP). More specifically, the AMS directive specifies the rules relating to incitement to hatred, accessibility for disabled people, the principles of jurisdiction, the promotion and distribution of European works, commercial communications or the protection of minors.

While providers of VSPs are required to take appropriate measures to ensure compliance with any conditions provided for by the AMS directive, ALIA evaluates the relevance of the measures taken by examining the type of content, the harm it is likely to cause, the characteristics of the

category of persons to be protected, as well as the legitimate rights and interests at stake, including those of the providers of PSVs and those of the users who created the content or posted it online, and the interest of the general public.

As provided for by the directive, ALIA submitted two reports to the European Commission in 2022, one on the accessibility of audiovisual media services in Luxembourg and one on the promotion of European works. These two reports will provide an overview of the status quo in the EU as well as allow to assess the situation and to identify areas for improvement.

The DMA aims to ensure that the markets in which online platforms operate remain fair, competitive and accessible for innovative companies. In this perspective, the DMA introduces rules for platforms acting as “access controllers”.





The AMS directive aims at the coordination, at the level of the European Union, of national legislation applicable to all audiovisual media, in this case traditional so-called linear television programmes, on-demand services and, since its revision in 2018, video sharing platforms.



The proposal for a regulation on transparency and targeting of political advertisements

In 2021, the Commission presented a set of measures aimed at ensuring greater transparency in political advertising, given that online political campaigns are gaining in importance. The proposed regulation defines, for the first time at European level, the concept of political advertising, specifies provisions to promote transparency and the identification of these contents and delimits their targeting and amplification. This means that any political advertising will now have to be clearly identified as such and contain information about the people

behind the financing of an advertisement. Political targeting and amplification techniques must be prohibited if they use sensitive personal data without the express consent of the person concerned and must be explained publicly with an unprecedented level of detail. This initiative is aiming, among other things, at economic actors and political parties in the EU. Its objective is to disclose the source and purpose of advertising and to fight against disinformation. In 2022 ALIA followed the development of this draft text, both at national level and within the context of ERGA, and contributed to a joint declaration as well as a position paper insisting on strengthening the definitions of political advertising, the level of transparency and the delimitation of targeting and amplification techniques.

Cooperation within the EU: The Group of European regulators for audiovisual media services (ERGA)

Established by a decision of the European Commission in 2014, ERGA brings together the audiovisual regulatory authorities of the twenty-seven Member States of the European Union. Subscribing to the fundamental democratic, economic, social and cultural values, the group aims to strengthen closer cooperation between the authorities to promote a coherent and effective implementation of regulations in the

European Union. In 2022, ERGA was chaired by Karim Ibourki, president of the Higher Audiovisual Council (Conseil Supérieur de l'Audiovisuel - CSA) in charge of regulating the audiovisual media sector in the Fédération Wallonie-Bruxelles.

ERGA organised two plenary meetings in 2022, in which ALIA was represented by its president Thierry Hoscheit. In accordance with its annual work programme, ERGA also held numerous meetings of its work groups throughout the year. As a regular member, ALIA closely followed the work of these different groups and accompanied the development of reports and other joint publications of ERGA. The format of three thematic subgroups, combined with an action group from the previous year, was maintained in 2022.

More precisely, the work of the first group essentially focussed on the subject of the implementation of the framework of the AMS directive. Based on the work and guidance documents produced in 2021, in particular with regard to the new obligations of audiovisual media service providers and VSPs, including vloggers, ERGA members collaborated on the preparation of three reports. The first report focuses on monitoring compliance with the measures taken by the VSPs as a result of these new obligations and the assessment of the effectiveness of



these measures. In addition, there is a study of how algorithms or recommendation systems could promote the production and access to European works. And finally, a report focused on the identification of vloggers and the regulation of their commercial communication.

The mandate of the second work group was to monitor and contribute to discussions on the regulation of media and online content, to ensure that the role and competence of ERGA are taken into account. In this context, the group followed and contributed to the EU political discussions on the DSA and, as a new area of work, developed the position of ERGA in relation to the EMFA proposal.

Based on the orientations and the experience of the third work group of 2021, ERGA continued its work on disinformation, political advertising and other issues related to the Action Plan for European Democracy. To this end, the group published strategic notes and position papers to contribute to European debates in this field.

Finally, the action group closely monitored and supervised the application of the measures provided for in the Memorandum of Understanding, which creates a common framework for cooperation between the members of ERGA on cross-border affairs. In this regard,

a general report was compiled to assess which parts of the Memorandum of Understanding have worked well and which difficulties have arisen regarding its practical application.

Media literacy also continued to be a very important topic in the work of ERGA and was dealt with in a Liaison Group on Media Literacy, in which ALIA participated as a member in 2022. With several meetings during the year, the group's objective was to keep abreast of media literacy activities at EU level, to exchange with relevant stakeholders such as the Commission or to set up good practice initiatives.

International relations

Multilateral cooperation *European platform of regulatory authorities (EPRA)*

Created in Malta in 1995 EPRA is an informal discussion forum between audiovisual regulators in Europe on topics of common interest. It constitutes a network for the exchange of information and good practices and allows enhanced cooperation between its members, i.e., 55 regulatory authorities from 47 countries.

Within EPRA, ALIA took part in work meetings and events organised throughout the year. In 2022, EPRA's work focused on three complementary subjects.

During the first semester, the thematic focus was the accountability and protection of minors, a key regulatory concern in all jurisdictions, to ensure the protection of a vulnerable public by taking into account the rights of the child.

During the second semester, the subjects of de-/misinformation, plurality and trust dominated the work of EPRA to develop strategies aimed at combating disinformation and guaranteeing the plurality of media and the reliability of content.

The third subject, namely the regulatory authorities in a digital environment, was raised during an exchange on new work methods and the practical implications for the authorities of the (co-)regulation of online content.

These subjects were discussed in particular during two EPRA meetings in which ALIA participated in May in Antwerp (Belgium) and in October in Antalya (Turkey).

In addition, having joined in 2021 the round table "AI & Regulators" ("Artificial intelligence and Regulators") of EPRA, ALIA continued its collaboration at the meetings of this group to promote an in-depth exchange on the different experiences and initiatives in terms of automated digital tools between the regulators of the audiovisual sector.



Likewise, ALIA was part of the EPRA Media and Information Literacy Taskforce (EMIL), to encourage coordination and learning, to promote the creation of networks and partnerships and to give a voice to media education networks. Four meetings of the EMIL group, in which ALIA participated, took place in 2022 to discuss a wide range of topics, including disinformation, evaluation and the empowerment of children and young people. In addition, there were three workshops on video sharing platforms and regulation (“VSP & Regulation”) aimed at facilitating the exchange of good practices between EPRA members based on their experience in age restriction and hate speech.

REFRAM

ALIA is a member of REFRAM, created in Ouagadougou (Burkina Faso) in 2007 and composed of 31 media authorities from African, American and European countries with French in common. The network wants to contribute to the consolidation of the rule of law, democracy and human rights through cooperation and the exchange of good practices and information. In October 2022, Mr. Roch-Olivier Maistre (president of the French audiovisual and digital communication regulatory authority - Autorité de régulation de la communication audiovisuelle et numérique française - ARCOM) succeeded Mr. Nouri Lajmi (president of the Inde-

pendent Tunisian High Authority for audiovisual communication - Haute Autorité indépendante de la communication audiovisuelle tunisienne - HAICA) as president of REFRAM.

In 2022, ALIA participated in the annual meeting held in October 2022 in Paris. The session allowed regulators and platforms (including representatives of the giants Google, Twitter and Meta) to discuss the adoption of the DSA.

Recognising the importance of a thorough and regular dialogue on topics of common interest, REFRAM aims to establish and strengthen exchanges between its members and constitutes a space for debate and cooperation.

Bilateral exchanges / other events

Beyond its commitments within the framework of the networks of regulators, ALIA has invested in strengthening its international relations during the year 2022 through informal exchanges with European counterparts and a visit by the delegation of the “Landesmedienanstalt Saarland” in the premises of ALIA. In addition, the Authority participated in various conferences such as:

- ▶ the conference within the framework of the Czech Presidency “Opportunities (and limits) for media and copyright regulation and self-regulation” in Prague;
- ▶ the public conference “Safeguarding Freedom - Protecting Democracy”, organised by “Die Medienanstalten”, the German Federal Media Authority, in cooperation with the North Rhine-Westphalia Media Authority, which was held in Brussels;
- ▶ the conference “Tech to keep children safe online” organised by the European Parliament in Brussels.
- ▶ the annual conference on European media law organised by the Academy of European law (ERA) (online);





08
Financial
resources



Financial resources

The Authority receives an annual endowment from the state budget. ALIA also collects an annual fee from the audiovisual media services under its supervision.

The Authority must keep accounts in accordance with the principles applicable in commercial matters and is subject to the supervision of both a company auditor, appointed by its Board of Directors and approved by the Government Council, and the Court of Auditors.

The balance sheet and profit and loss account of the Authority for the year 2022 as audited by the auditor and submitted for approval by the Government Council at its meeting of April 21st, 2023 are as follows:

Balance sheet (financial year of 01/01/2022 to 31/12/2022)

Assets

A. Fixed assets	458.497,02
I. Intangible assets	8.759,21
II. Property, plant and equipment	449.737,81
1. Technical installations and machinery	329.785,33
2. Other installations, tools and furniture	119.952,48
B. Current assets	991.019,46
II. Debt	19.620,21
1. Receivables from sales and services	16.087,96
4. Other receivables	3.532,25
IV. Assets in banks, CCP, in cash	971.399,25
C. Accrual accounts	116.150,66
TOTAL ASSETS	1.565.667,14



LIABILITIES

A. Own capital	1.536.473,75
I. Deferred results	1.405.245,65
II. Result for the year	131.228,10
B. Provisions	6.000,00
1. Other provisions	6.000,00
C. Non-subordinated debt	23.193,39
1. Debts on purchases and services	10.376,93
2. Tax debts and social security debts	15.687,25
a) Tax liabilities	4.767,38
b) Social security liabilities	10.919,87
3. Other liabilities	-2.870,79
D. Accrual accounts	0,00
TOTAL LIABILITIES	1.565.667,14

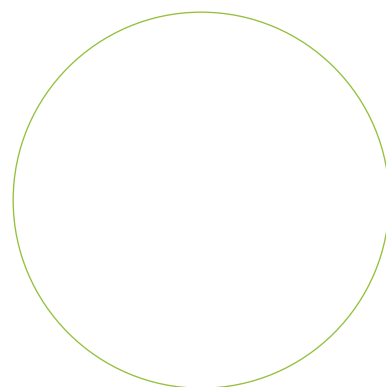
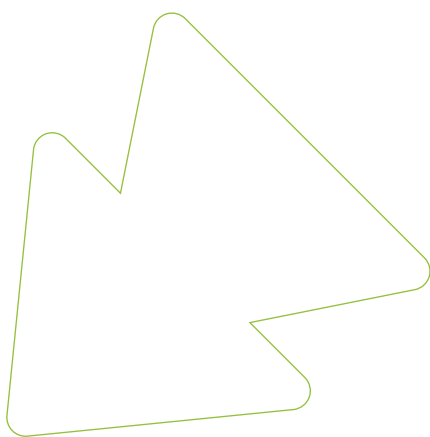
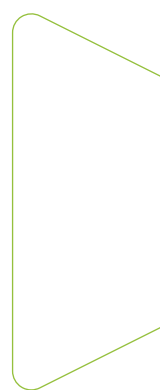
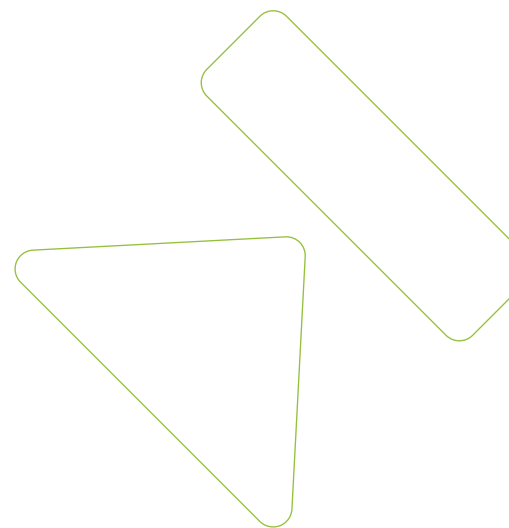
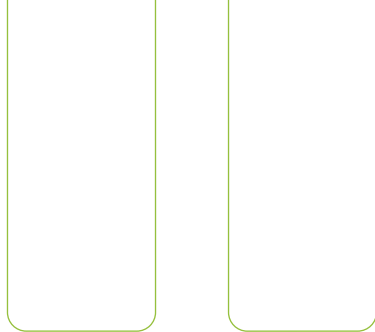
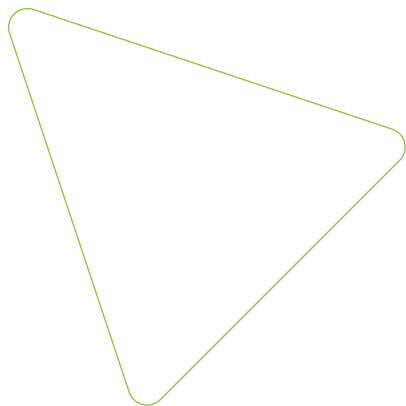


Profit and loss account (financial year of 01/01/2022 to 31/12/2022)

A. EXPENSES	
3. Consumption goods & raw materials and consumables	673.836,37
a) Other external expenses	673.836,37
4. Staff costs	1.181.595,34
a) Salaries and wages	1.123.996,76
b) Social security contributions covering wages and salaries	57.598,58
5. Value corrections	149.780,95
a) on establishment costs and tangible and intangible fixed assets	149.780,95
6. Other operating expenses	122.356,19
8. Interest and financial expenses	2.159,86
Result for the year	131.228,10
TOTAL EXPENSES	2.260.947,81
B. REVENUES	
1. Net turnover	780.500,00
2. Other operating income	1.480.456,81
TOTAL REVENUES	2.260.947,81



09
Annexes



Annexes

Annex 1

Composition of ALIA bodies

Composition of the Board of Directors on December 31, 2022

Thierry **HOSCHEIT**, President
 Valérie **DUPONG**, Marc **GLESENER**, Luc **WEITZEL**, Claude **WOLF**, members
 Carole **KICKERT**, secretary

Composition of the administrative team on December 31, 2022

Paul H. **LORENZ**, Director
 Samra **CINDRAK**, David **CORTEZZI**, Magali **GORYNIA**, Carole **KICKERT**, Saskia **MANN**, Catia **MONTEIRO**,
 Myriam **MOSSONG**, Diane **PRÜM**, Emmanuelle **WENER**, Nora **WENNER** et Sandy **ZOLLER**.

Composition of the Advisory Committee for the year 2022

The advisory body of ALIA has 24 members, delegated for a period of five years by the most representative national organisations of social and cultural life.

Organisation	Representative
CSV parliamentary group	Mara BILO
LSAP parliamentary group	Joël ZANGERLÉ
DP parliamentary group	Christine FIXMER
Dei Gréng parliamentary group	Abbes JACOBY
ADR political grouping	Michel LEMAIRE
Déi Lénk political grouping	Maurice MAGAR
Piraten political grouping	Stéphanie SCHINTGEN
Chamber of Commerce	Patrick ERNZER
Chamber of Agriculture	Léon WIETOR
Chamber of Trades and Crafts	Alain SCHREURS
Chamber of civil servants and public employees	Stéphanie OLINGER
Syvicol	Max LEMMER



Organisation	Representative
Syvicol	Laurent GRAAFF
Advisory Commission on Human Rights	Rh�ea ZIAD�
Ombudsman fir Kanner a Jugendlecher	Fernand SCHINTGEN
National Council of Women of Luxembourg	Laury MOLLING-BISENIUS
National Council for foreigners	Hendrika Maria GOSLINGS-KANTERS
Luxembourg consumers' union	Agn�s REDING
Medico-social league	Jean RODESCH
University of Luxembourg	Mark COLE
Union Grand-Duc Adolphe	Gilbert GIRSCH
Press council	Fernand WEIDES
Security made in L�tzebuerg	Jeff KAUFMANN
ICTLuxembourg	Nico BINSFELD

Annex 2

New legislation

In 2021, some adaptations were made to the legislative arsenal relating to ALIA's field of activity.

The law of July 22, 2022 amending 1° the amended electoral law of February 18, 2003; 2° the amended law of July 27, 1991 on electronic media created a legal basis for allocating two new tasks to the Authority: the organisation of the media election campaign and the

organisation of political information programmes. ALIA is called upon to publish a report on the progress for each election campaign.

The law of August 12, 2022 on the organisation of the public establishment "M dia de service public 100,7" and amending the amended law of July 27, 1991 on electronic media with the aim to strengthen Luxembourg's public service radio by adapting its legal framework to contemporary international stand-

ards. The law concerns ALIA in that its new article 16 provides that it is competent for monitoring the content of the programmes of Radio 100.7 in accordance with article 35, paragraph 2, letter g) of the amended law of July 27, 1991 on electronic media.

The **Grand-ducal regulation of September 14, 2022 on the organisation of the Media and communications department (Service des m dias et des communica-**



tions) created by article 29 of the law of July 27, 1991 on electronic media organises the Media, Connectivity and Digital Policy Department (Service des médias, de la connectivité et de la politique numérique - SMC) at the Ministry of Communications and Media. The latter now includes four directorates:

- ▶ The directorate “Administration and General Affairs”;
- ▶ The directorate “Media and Information Society”;
- ▶ The direction “Connectivity”;
- ▶ The directorate “Digital Policy”.

In its article 2.b), the regulation gives the SMC the mission of assisting the competent Minister in the definition and execution of the media policy, including permissions and concessions for radio and television programmes that do not fall under the competence of ALIA. The article also specifies that the SMC is responsible for monitoring relations with ALIA, the Press Council and the National Fund for Audiovisual production (Fonds national pour la production audiovisuelle).

The adoption of the **grand-ducal regulation of December 28, 2022 amending the grand-ducal regulation of February 2, 2015 on the**

amount and payment methods of fees to be collected by the Luxembourg Independent Audiovisual Authority in terms of supervision of audiovisual and sound media services occurred in the context of the military aggression of the Russian Federation against Ukraine and specifies that “*providers of audiovisual media services under the supervision of the National Council of Broadcasting and Television of Ukraine and falling under Luxembourg jurisdiction [...] are exempt from the fee*” to be collected by ALIA.



Annex 3

Services subject to ALIA's supervision

Status as of 31/12/2022

Name of the service	Name of the service provider	Category	System for the protection of minors
.dok den oppene kanal	DOK S.A. 5, rue des jardins L-7325 Heisdorf	Television	LU
2ten RTL (SD & HD)	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
92 News	Glaxy Broadcasting Network Ltd First Central 200, 6th Floor 2 Lakeside Drive, Park Royal London NW10 7FQ, UK	Television	LU
A1 TV	Future Media Network Ltd 76 High Road Ilford, Essex, IG1 1DL UK	Television	LU
Aastha	Vedic Broadcasting Network (UK) Ltd 40 Lambhill Street Glasgow, Scotland, G41 1AU UK	Television	LU
Adult Channel	MG Global Entertainment (Europe) Ltd The Junction, 4-10 Cowley Road Uxbridge, UB8 2XW UK	Television	IRL
Akaal TV	Akaal Channel Ltd 68-82 Soho Hill Hockley Birmingham B19 1AA UK	Television	LU
Alibi (SD + HD)	UKTV Media Ltd 10, Hammersmith Grove London W6 7AP UK	Television	IRL
Alibi +1			
Altice Studio	Altice Entertainment News & Sport S.A. 5, rue Eugène Ruppert L-2453 Luxembourg	Television	LU
Amazon EPG	Amazon Media EU S.à r.l. 38, avenue John F. Kennedy L-1855 Luxembourg	Television	LU
Apart TV	Apart TV S.à r.l. 28, rue du Kiem L-4976 Bettange-sur-Mess	Television	LU
Arena4	Network4 Media Group S.à r.l. 16a, avenue de la Liberté L-1930 Luxembourg	Television VOD	LU
Arise News (formerly Live 360)	Live Entertainment Ltd / Vision247 Ltd Chiswick Park 2nd Floor, Building 10 566 Chiswick High Road London, W4 5XS UK	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Ary Digital	New Vision TV Ltd AMC House 12 Cumberland Avenue London NW10 7QL UK	Television	LU
Ary World			
ATN Bangla	ATN Bangla UK Ltd 3/5 Hillstone Court Empson Street London E3 3LT UK	Television	LU
Ayozat TV (formerly Showcase)	Information TV Ltd 64 Newman Street London W1T3EF UK	Television	LU
B4U Movies	B4U Network (Europe) Ltd Transputec House 19, Heather Park Drive Wembley HA0 1SS UK	Television	LU
B4U Music			
Babenation	Square World Communications Ltd Wessex House Station Road Westbury Wiltshire, BA13 3JN UK	Television	LU
Babes & Brazzers	MG Global Entertainment (Europe) Ltd The Junction, 4-10 Cowley Road Uxbridge, UB8 2XW UK	Television	IRL
BasTV	M. Barend Winston Schagen 14a, Maison L-7433 Grevenknapp	VOD	LU
BBC Four (SD + HD)			
BBC News (SD)	British Broadcasting Corporation BBC Broadcasting House Portland Place London W1A 1AA UK	Television	IRL
BBC One (SD + HD)			
BBC Three (SD + HD)			
BBC Two (SD + HD)			
BBC World News	British Broadcasting Corporation BBC Broadcasting House Portland Place London W1A 1AA UK	Television	LU
Best Direct	Best Direct (International) Ltd Suites 17 & 18 Riverside House Lower Southend Road Wickford, Essex, SS11 8BB UK	Television	LU
Bissen TV	Administration communale de Bissen 1, Rue des Moulins L-7784 Bissen	VOD	LU
Blaze	A+E Networks EMEA (AETN UK) 1 Queen Charlotte Street Hammersmith London W6 9YN UK	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Bloomberg Television GB (<i>HD only</i>)	Bloomberg L.P. 3, Queen Victoria Street London EC4N 8BH UK	Television	LU
Bloomberg TV Europe (<i>SD only</i>)			
Brit Asia	Brit Asia TV 158 Broad Street Birmingham B15 1DT UK	Television	LU
Cameraboys.com	JWS Americas S.à r.l. & JWS International S.à r.l. 44, Avenue J.F. Kennedy L-1855 Luxembourg	VSP	LU
Canal+ Sport 2	Canal+ Luxembourg S.à r.l. 4, rue Albert Borschette L-1246 Luxembourg (trade name M7 Group, abbreviated M7)	Television	LU
Canal+ Sport 3			
Canal+ Sport 4			
Canal+ Sport 5			
Canal+ Sport 6			
Canal+ Sport 7			
Canal+ Sport Slovak video feed			
Canal+ Sport Czech video feed			
CBBC (<i>SD + HD</i>)			
Cbeebies (<i>SD + HD</i>)			
Challenge (<i>SD</i>)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
Chamber TV	Chambre des Députés 23, rue du Marché-aux-Herbes L-1728 Luxembourg	Television	LU
Channel 4	Channel Four Television Corporation 124-126 Horseferry Road Westminster London SW1P 2TX UK	Television	LU
Channel 4 (+1)			
Channel 44	City News Network (SMC) Pvt Ltd London Office 23 Oliver Business Park Oliver Road London NW10 7JB UK	Television	LU
CHS TV	CHS TV Ltd Prestige House 36, Clifford Road London E17 4JE UK	Television	LU
CI - Crime + Investigation (<i>SD + HD</i>)	A+E Networks EMEA (AETN UK) 1 Queen Charlotte Street Hammersmith London W6 9YN UK	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Cinemanía	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU
Club RTL	RTL Belux S.A. & Cie S.E.C.S. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
CNBC (SD + HD)	CNBC UK Ltd 10 Fleet Place London EC4M 7QS UK	Television	LU
CNN International	Cable News Network Inc One CNN Center Atlanta Georgia 30303 USA	Television	LU
Colors (SD + HD)	Viacom18 Media Private Ltd London Office c/o Indiacast UK Ltd Suite 2.11 Regus Building 79, College Road Harrow on Hill, HA1 1BD UK	Television	LU
Colors Cineplex			
Colors Gujarati			
Colors Rishtey			
Commune de Wiltz - Mediathèque	Administration communale de Wiltz 2, Grand-Rue L-9530 Wiltz	VOD	LU
Consdorf en vidéo	Administration communale de Consdorf 8, route d'Echternach L-6212 Consdorf	VOD	LU
Cool TV	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	HUN
Court TV	Scripps Media Inc 312 Walnut Street Suite 2800 Cincinnati, Ohio, 45202 USA	Television	LU
Craft Extra	Hochanda Global Ltd Nene House Nene Valley Business Park Oundle Peterborough, PE8 4HN UK	Television	LU
Create and Craft			
Crime District	Mediawan Lux. S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg (formerly AB Entertainment S.A.)	Television	LU
Dave (SD + HD)	UKTV Media Ltd 10, Hammersmith Grove London W6 7AP UK	Television	IRL
Dave (+1)			
Deen TV	Deen TV Ltd 534 Barking Road Plaistow London E13 8QE UK	Television	LU
Diekirch Infokanal	Administration communale de Diekirch 27, Avenue de la Gare L-9233 Diekirch	Television	LU
Dikrich TV	Administration communale de Diekirch 27, Avenue de la Gare L-9233 Diekirch	VOD	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Direct One	Canal+ Luxembourg S.à r.l. 4, rue Albert Borschette L-1246 Luxembourg (trade name M7 Group, abbreviated M7)	Television	LU
Direct Store TV (formerly <i>Psychic Today</i>)	Majestic TV Ltd 184 The Terrace The Dell Southampton, SO15 2BU UK	Television	LU
Drama (+1)	UKTV Media Ltd 10, Hammersmith Grove London W6 7AP UK	Television	IRL
Drama (SD)			
Dudelange Info TV	Administration communale de Dudelange Place de l'Hôtel de Ville B.P. 73 L-3401 Dudelange	Television	LU
Dudelange Info TV (<i>Diddeleng Info TV</i>)	Administration communale de Dudelange Place de l'Hôtel de Ville B.P. 73 L-3401 Dudelange	VOD	LU
Dünya TV	Dunya News Ltd Justin Plaza 2 341 London Road Mitcham, Surrey CR4 4BE UK	Television	LU
E! (SD + HD)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
E4 (+1)	Channel Four Television Corporation 124-126 Horseferry Road Westminster London SW1P 2TX UK	Television	LU
E4 (SD)			
E4 Extra			
Earthx TV	Earth Day Texas Inc 4311 Oak Lawn Avenue, Suite 250 Dallas – Texas 75219 USA	Television	LU
Eden (+1)	UKTV Media Ltd 10, Hammersmith Grove London W6 7AP UK	Television	IRL
Eden (SD)			
Eldo TV	Luxradio S.à r.l. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
Eman Channel	Eman Channel Ltd Unit 8 Murihead Quay Barking Birmingham IG11 7BG UK	Television	LU
Esch TV	Administration communale de Esch-sur-Alzette Place de l'Hôtel de Ville B.P. 145 L-4002 Esch-sur-Alzette	VOD Television	LU
Euro D	Osmose Media S.A. 177, rue de Luxembourg L-8077 Bertrange	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Explore	Mediawan Lux. S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg (formerly AB Entertainment S.A.)	VOD	LU
Film+	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	HUN
Film4	Network4 Media Group S.à r.l. 16a, avenue de la Liberté L-1930 Luxembourg	Television	LU
Focus Sat TV	Canal+ Luxembourg S.à r.l. 4, rue Albert Borschette L-1246 Luxembourg (trade name M7 Group, abbreviated M7)	Television	LU
FoodXP	Media Worldwide Ltd 2nd Floor, 2 Warner House Harrovia Business Village Bessborough Road Harrow HA1 3EX UK	Television	LU
Galaxy4	Network4 Media Group S.à r.l. 16a, avenue de la Liberté L-1930 Luxembourg	Television	LU
Galerie de vidéos Ville d'Echternach	Administration communale d'Echternach B.P. 22 L-6460 Echternach	VOD	LU
Galerie vidéo Ville de Differdange	Administration communale de Differdange 40, avenue Charlotte L-4530 Differdange	VOD	LU
Gemeng Kielen - Videothéik	Administration communale de Kehlen 15, Rue de Mamer L-8280 Kehlen	VOD	LU
Gemporia Craft	Primal Living Ltd (Gemporia Group) Eagle Road Studios Unit 2D, Eagle Road Redditch, Worcestershire B98 9HF UK	Television	LU
Gems TV	Gemporia Ltd Eagle Road Studios Unit 2D, Eagle Road Redditch, Worcestershire B98 9HF UK	Television	LU
Geo News Geo TV	Geo TV Ltd 1 Sun Street London EC2A 2EP UK	Television	LU
Get Lucky	Grandiose Ltd 184 The Terrace The Dell Southampton, SO15 2BU UK	Television	LU
Ginx eSports TV	Ginx TV Ltd Unit 8 Acorn Production Centre 105 Blundell Street London, N7 9BN UK	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Gold (<i>SD + HD</i>) Gold <i>+(1)</i>	UKTV Media Ltd 10, Hammersmith Grove London W6 7AP UK	Television	<i>IRL</i>
Golf Channel	Mediawan Lux. S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg (formerly AB Entertainment S.A.)	Television	<i>LU</i>
Hi impact TV	Solution Media and Infotech UK Ltd Unit 3 Merchant Evergate Business Park Ashford, Kent TN25 6SX UK	Television	<i>LU</i>
Hidayat TV	Hidayat Welfare Society Ltd 9 Birch Street Manchester, M12 5NT UK	Television	<i>LU</i>
High Street 2 High Street 3 High Street 4 High Street 5 High Street TV	HSTV Media Ltd Central House, Beckwith Knowle Otley Road, Harrogate North Yorkshire HG3 1UF UK	Television	<i>LU</i>
HUM Europe HUM Masala	HUM Network UK Ltd 38-P Alum Rock Road Birmingham, B8 1JA UK	Television	<i>LU</i>
Ideal Extra Ideal World	Ideal World Ltd Ideal House, Newark Road Peterborough Cambridgeshire, PE15WG UK	Television	<i>LU</i>
Imam Hussein 3	Imam Hussein Media Group Ltd Flat 26 Kenwood Ct.1 Elmwood Crescent London NW9 9AB UK	Television	<i>LU</i>
Insomnia	Mediawan Lux. S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg (formerly AB Entertainment S.A.)	VOD	<i>LU</i>
ION TV	ION TV Ltd 87 Plashet Road E13 0RA London UK	Television	<i>LU</i>
Iqra Bangla	Runners TV Ltd 109-119 Cherry Orchard Road Croydon, Surrey CR0 6BE UK	Television	<i>LU</i>
Iqra TV (<i>Iqra Urdu</i>)	Channel I UK Ltd 109-119 Cherry Orchard Road Croydon, Surrey CR0 6BE UK	Television	<i>LU</i>
Islam Channel Islam Channel Urdu	Islam Channel (Urdu) Ltd Media House 428-432 Ley Street Ilford, Essex, IG2 7BS UK	Television	<i>LU</i>



Name of the service	Name of the service provider	Category	System for the protection of minors
ITV3	ITV Broadcasting Ltd 2 Waterhouse Square, Holborn London EC1N 2AE UK	Television	LU
ITV4	ITV Broadcasting Ltd 2 Waterhouse Square, Holborn London EC1N 2AE UK	Television	LU
Jewellery Maker	Jewellery Maker Ltd (Gemporia Group) Eagle Road Studios Unit 2D, Eagle Road Redditch, Worcestershire B98 9HF UK	Television	LU
Joyourself.com	JWS Americas S.à r.l. & JWS International S.à r.l. 44, Avenue J.F. Kennedy L-1855 Luxembourg	VSP	LU
Kanal 3	Luxembourg Movie Production a.s.b.l. 5, rue des jardins L-7325 Heisdorf	Television	LU
Kanshi TV	Kanshi TV Ltd 1st floor, Harvills Industrial Estate Harvills Howthorn, Hill top GB-West Bromwich, B70 0ST UK	Television	LU
Kayl.TV	Administration communale de Kayl 4, rue de l'Hôtel de Ville L-3674 Kayl	VOD	LU
Kitchen Mania	Mediawan Lux. S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg (formerly AB Entertainment S.A.)	VOD	LU
KUK.lu	KulturKanal a.s.b.l. 15a, rue de la Gare L-7535 Mersch	VOD	LU
LFC TV - Liverpool FC	Liverpool Football Club TV 20, Chapel Street Liverpool, L3 9AG UK	Television	LU
LiR (Lov i Ribolov) (Croatian version)	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU
LiR (Lov i Ribolov) (Serbian version)			
LiR (Lov i Ribolov) (Slovenian version)			
LiveJasmin.com	JWS Americas S.à r.l. & JWS International S.à r.l. 44, Avenue J.F. Kennedy L-1855 Luxembourg	VSP	LU
Liveprivates.com			
Livesexasian.com			
Lord TV	Luxorr a.s.b.l. 7, rue Alcide de Gasperi L-1615 Luxembourg	Television	LU
LoveWorld	LoveWorld UK Unit 2, Standard Industrial Estate Henley Road London E16 UK	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Lsawards.com	JWS Americas S.à r.l. & JWS International S.à r.l. 44, Avenue J.F. Kennedy L-1855 Luxembourg	VSP	LU
Lucky Jack	Mediawan Lux. S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg (formerly AB Entertainment S.A.)	Television	LU
LUXE.TV Luxembourg (English version)	Opuntia S.A. 31, rue N.S. Pierret L-2335 Luxembourg	Television	LU
LUXE.TV Luxembourg (French version)			
m: SAT TV	Telekom Srbija Takovska 2 11000 Beograd Republic of Serbia	Television	LU
Madani Channel	Dawat-e-Islami UK Maudsley Street Bradford BD3 9LE UK	Television	LU
Match4	Network4 Media Group S.à r.l. 16a, avenue de la Liberté L-1930 Luxembourg	Television	LU
Maturescam.com	JWS Americas S.à r.l. & JWS International S.à r.l. 44, Avenue J.F. Kennedy L-1855 Luxembourg	VSP	LU
MATV (Channel)	MATV National Unit 2 & 3, Stanley House Orchard Close, Alperton Wembley HA0 4JB UK	Television	LU
MATV (Mamer)	Administration communale de Mamer B.P. 50 L-8201 Mamer	VOD	LU
MCS Extrême	MCS Group S.à r.l. 8D rue Collart L-8414 Steinfort Luxembourg	VOD	LU
Médiathèque vidéo Gemeng Berdorf	Administration communale de Berdorf 5, Rue de Consdorf L-6551 Berdorf	VOD	LU
Mersch Info TV	Administration communale de Mersch B.P. 93 L-7501 Mersch	VOD	LU
Miersch TV	Administration communale de Mersch B.P. 93 L-7501 Mersch	Television	LU
More4	Channel Four Television Corporation 124-126 Horseferry Road Westminster London SW1P 2TX UK	Television	LU
Movies 24	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
Movies 24 +			



Name of the service	Name of the service provider	Category	System for the protection of minors
MUTV (SD + HD)	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
Muzsika TV	MUTV Ltd Sir Matt Busby Way Old Trafford Manchester M16 0RA UK	Television	HUN
Mycams.com	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	VSP	LU
Mytrannycams.com	JWS Americas S.à r.l. & JWS International S.à r.l. 44, Avenue J.F. Kennedy L-1855 Luxembourg	VSP	LU
N1 (Bosnian version)	JWS Americas S.à r.l. & JWS International S.à r.l. 44, Avenue J.F. Kennedy L-1855 Luxembourg	Television	LU
N1 (Croatian version)			
N1 (Macedonian version)			
N1 (Montenegrin version)	Adria News S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU
N1 (Slovenian version)			
N1 (Serbian version)			
N1 BH			
N1 Croatia	Adria News S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	VOD	LU
N1 Serbia			
N1 Slovenia			
NDTV 24x7	New Delhi Television Ltd B-50 A, 2nd Floor, Archana Complex Greater Kailash – 1 New Delhi - 110048 India	Television	LU
Neo News	Up & Coming TV Ltd Grange Interlink Summerville Road Bradford, B07 1PX UK	Television	LU
NHK World - Japan	NHK (Japan Broadcasting Corporation) NHK Broadcasting Center Jinnan,2-2-1, Shibuya-ku Tokyo 150-8001 Japan	Television	LU
Noor TV	Mohiuddin Digital Television Ltd 14 Victoria Road Aston Birmingham, B6 5HA UK	Television	LU
Nordlicht	Nordlicht TV a.s.b.l. 22, route de Diekirch L-9381 Moestroff	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Nova S (<i>Croatian version</i>)	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU
Nova S (<i>Macedonian version</i>)			
Nova S (<i>Serbian version</i>)			
Nova Sport (<i>Croatian version</i>)			
Nova Sport (<i>Serbian version</i>)			
NTD TV Europe	New Tang Dynasty Television (Universal Communications Network Inc.) 229 West 28th Street, Suite 700 New York, NY 10001 USA	Television	LU
NTV	Int. Television Channel Europe Ltd Unit 17-18 4 Raven Road London, E18 1HB UK	Television	LU
Pétange Info TV	Administration communale de Pétange B.P. 23 L-4701 Pétange	VOD	LU
Pétange Info TV	Administration communale de Pétange B.P. 23 L-4701 Pétange	Television	LU
Pick TV (<i>+1 Ireland</i>)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
Pick TV (<i>SD</i>)			
Pikaboo (<i>Albanian version</i>)	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU
Pikaboo (<i>Bosnian version</i>)			
Pikaboo (<i>Croatian version</i>)			
Pikaboo (<i>Macedonian version</i>)			
Pikaboo (<i>Montenegrin version</i>)			
Pikaboo (<i>Serbian version</i>)			
Pikaboo (<i>Slovenian version</i>)			
Pitaara	Paul E Commerce Private Ltd 2nd Floor, Warner House Harrobian Business Village Bessborough Road Harrow, HA1 3EX UK	Television	LU
Plug RTL	RTL Belux S.A. & Cie S.E.C.S. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
Politics Punjab	Politics Punjab Broadcasting Ltd 143 Sandwell Road Birmingham, B21 8PD UK	Television	LU
Porndolive.lsl.com	JWS Americas S.à r.l. & JWS International S.à r.l. 44, Avenue J.F. Kennedy L-1855 Luxembourg	VSP	LU
Pornhdlive.com			



Name of the service	Name of the service provider	Category	System for the protection of minors
Post TV	Post Télécom S.A. 1, rue Emile Bian L-2996 Luxembourg	VOD	LU
PTC Punjabi	G Next Media UK Ltd 3.05 1, King Street London EC2V 8AU UK	Television	LU
PTV Global	Pakistan Television Corporation Ltd PTV Global Constitution Avenue, F-5/1 Islamabad 44000 Pakistan	Television	LU
QVC Beauty	QVC UK Building 8, Chiswick Park 566 Chiswick High Road London W4 3XU UK	Television	LU
QVC Extra			
QVC HD			
QVC Style			
Racing TV	RMG Operations Ltd Third Floor Gillingham House 38-44 Gillingham Street London SW1V 1HU UK	Television	LU
Republic Bharat	Worldview Media Network Ltd 2nd Floor, 2 Warner House Harrobian Business Village Bessborough Road Harrow HA1 3EX UK	Television	LU
Rocklab	Centre de Musiques Amplifiées 5, Avenue du Rock'n Roll L-4361 Esch-sur-Alzette	VOD	LU
RTL 4 (NL)	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	NL
RTL 5 (NL)			
RTL 7 (NL)			
RTL 8 (NL)			
RTL 9 (FR)	RTL 9 S.A. et Cie S.E.C.S. 43, Boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
RTL Crime	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	NL
RTL Gold	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	HUN
RTL Három (formerly RTL+)			
RTL Kettő (formerly RTL II)			
RTL Lounge	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	NL
RTL MOST (FOD + SVOD)	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	VOD	HUN



Name of the service	Name of the service provider	Category	System for the protection of minors
RTL Nieuws	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	VOD	NL
RTL Play (Belgium <i>rtlplay.be</i>)	RTL Belux S.A. & Cie S.E.C.S. 43, boulevard Pierre Frieden L-1543 Luxembourg	VOD	LU
RTL Play (Luxembourg <i>rtlplay.lu</i>)	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	VOD	LU
RTL Shopping	RTL Shopping S.A. et Cie S.E.C.S. 43, Boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
RTL Sport Live Arena	RTL Lëtzebuerg 43, Boulevard Pierre Frieden L-1543 Luxembourg	VOD	LU
RTL Télé Letzebuerg (SD & HD)	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
RTL Telekids	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	NL
RTL Tvi	RTL Belux S.A. & Cie S.E.C.S. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
RTL XL	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	VOD	NL
RTL Z	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	NL
RTL.be	RTL Belux S.A. & Cie S.E.C.S. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	LU
SAMAA TV	SAMAA TV 337 Forest Road London, E17 5JR UK	Television	LU
Sanskar	Sanskar Info TV UK Ltd 40, Lambhill Street Glasgow, Scotland G41 1AU UK	Television	LU
Schëtter - Médiathèque	Administration communale de Schuttrange 2, place de l'Eglise L-5367 Schuttrange	VOD	LU
SFR Play	Altice Entertainment News & Sport S.A. 5, rue Eugène Ruppert L-2453 Luxembourg	VOD	LU
Shanson TV	" Shanson TV " LLC Marshal Proshlyakov street, 30, Office 307 123458 Moscow Russian Federation	Television	LU
Siraj TV	Siraj TV Limited Kemp House 152-160 City Road London EC1V 2NX UK	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
SK Fight	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU
Sky Active			
Sky Arts (SD + HD)			
Sky Atlantic (+1)			
Sky Atlantic (SD + HD)			
Sky Barker Service (SD + HD)			
Sky Cinema Action + Adventure (SD + HD)			
Sky Cinema Animation (HD)			
Sky Cinema Comedy (SD + HD)			
Sky Cinema Crime & Thriller (SD + HD)			
Sky Cinema Drama (SD+ HD)			
Sky Cinema Family (SD + HD)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
Sky Cinema Greats (SD + HD)			
Sky Cinema Hits (HD)			
Sky Cinema Premiere (SD + HD)			
Sky Cinema Premiere +1			
Sky Cinema SciFi & Horror (HD)			
Sky Cinema Select (HD)			
Sky Comedy (SD +HD)			
Sky Crime (+1)			
Sky Crime (SD+HD)			
Sky Documentaries (SD + HD)			
Sky EPG			
Sky EPG Slate			
Sky History (SD + HD)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	LU
Sky History 2 (SD + HD)			
Sky Max (HD)			
Sky Nature (SD + HD)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
Sky News (SD + HD)			
Sky News International	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Sky Replay (SD)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
Sky Sci-Fi (+1)		Television	LU
Sky Sci-Fi (SD + HD)			
Sky Showcase (+1)			
Sky Showcase (SD + HD)			
Sky Sports Action (SD + HD) Temporary Name Change to Sky Sports NFL until February 2023			
Sky Sports Arena (SD + HD)			
Sky Sports Box Office (SD + HD)			
Sky Sports Cricket (SD + HD)			
Sky Sports F1 (SD + HD)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
Sky Sports Floating Pub			
Sky Sports Football (SD + HD)			
Sky Sports Golf (SD + HD)			
Sky Sports Main Event (SD + HD + UHD)			
Sky Sports Main Event Pub (HD)			
Sky Sports Mix (SD + HD)			
Sky Sports News (SD + HD)			
Sky Sports Premier League (SD + HD)			
SKY Sports Racing (HD)	Attheraces Ltd 14th Floor Millbank Tower 21-24 Millbank London SW1P 4QP UK	Television	LU
Sky Witness (+1)	SKY UK Ltd Grant Way Isleworth/Middlesex, TW7 5QD UK	Television	IRL
Sky Witness (SD +HD)			
Skylink 7 (English version)	Canal+ Luxembourg S.à r.l. 4, rue Albert Borschette L-1246 Luxembourg (trade name M7 Group, abbreviated M7)	Television	LU
Skylink 7 (Czech version)	Canal+ Luxembourg S.à r.l. 4, rue Albert Borschette L-1246 Luxembourg (trade name M7 Group, abbreviated M7)	Television	CZE
Skylink 7 (Slovak version)	Canal+ Luxembourg S.à r.l. 4, rue Albert Borschette L-1246 Luxembourg (trade name M7 Group, abbreviated M7)	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
Sony Entertainment Television	MSM Asia Ltd 166, College Road Harrow, HA1 1BH UK	Television	LU
Sony MAX			
Sony MAX 2			
Sony SAB			
Sooner Luxembourg (SVOD + TVOD)	UniversCiné Luxembourg S.à r.l. 238 C, Rue de Luxembourg L-8077 Bertrange	VOD	LU
Sorozat	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	HUN
Sport Klub Croatia	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	VOD	LU
Sport Klub Serbia			
Sport Klub Slovenia			
SportKlub 1 (Croatian version)	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU
SportKlub 1 (Serbian version)			
SportKlub 1 (Slovenian version)			
SportKlub 10 (Croatian version)			
SportKlub 10 (Serbian version)			
SportKlub 10 (Slovenian version)			
SportKlub 2 (Croatian version)			
SportKlub 2 (Serbian version)			
SportKlub 2 (Slovenian version)			
SportKlub 3 (Slovenian version)			
SportKlub 3 (Croatian version)			
SportKlub 3 (Serbian version)			
SportKlub 4 (Croatian version)			
SportKlub 4 (Slovenian version)			
SportKlub 4 (Serbian version)			
SportKlub 5 (Serbian version)			
SportKlub 5 (Croatian version)			
SportKlub 5 (Slovenian version)			
SportKlub 6 (Croatian version)			
SportKlub 6 (Serbian version)			
SportKlub 6 (Slovenian version)			



Name of the service	Name of the service provider	Category	System for the protection of minors			
SportKlub 7 (<i>Croatian version</i>)						
SportKlub 7 (<i>Serbian version</i>)						
SportKlub 7 (<i>Slovenian version</i>)						
SportKlub 8 (<i>Croatian version</i>)						
SportKlub 8 (<i>Serbian version</i>)						
SportKlub 8 (<i>Slovenian version</i>)						
SportKlub 9 (<i>Croatian version</i>)						
SportKlub 9 (<i>Serbian version</i>)						
SportKlub 9 (<i>Slovenian version</i>)						
SportKlub Esports (<i>Bosnian version</i>)						
SportKlub Esports (<i>Croatian version</i>)	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU			
SportKlub Esports (<i>Macedonian version</i>)						
SportKlub Esports (<i>Montenegrin version</i>)						
SportKlub Esports (<i>Serbian version</i>)						
SportKlub Esports (<i>Slovenian version</i>)						
SportKlub Golf (<i>Croatian version</i>)						
SportKlub Golf (<i>Serbian version</i>)						
SportKlub Golf (<i>Slovenian version</i>)						
SportKlub HD (<i>Croatian version</i>)						
SportKlub HD (<i>Serbian version</i>)						
SportKlub HD (<i>Slovenian version</i>)						
SportyStuff HD				Greyhound TV Ltd 5 Fleet Street London, EC4M 7RD UK	Television	LU
Spotlight TV				Keep It Country TV Ltd 2a Ardleigh Green Road Hornchurch, Essex, RM112LN UK	Television	LU
Stengefort News				Administration communale de Steinfort 4, Square Patton L-8443 Steinfort	VOD	LU
Story4 (<i>Hungarian version, targeting the Czech Republic and Slovakia</i>)	Network4 Media Group S.à r.l. 16a, avenue de la Liberté L-1930 Luxembourg	Television	LU			
Story4 (<i>Hungarian version, targeting Hungary</i>)						
Story4 (<i>Czech version</i>)						



Name of the service	Name of the service provider	Category	System for the protection of minors
Studio 66 3	965 TV Ltd 201 Haverstock Hill London NW3 4QG UK	Television	LU
Takbeer TV	Takbeer TV Ltd 17-21 Ombersley Road Balsall Heath Birmingham B12 8UT UK	Television	LU
Talking Pictures TV	Talking Pictures TV Ltd Highcroft Langley Road Kings Langley WD4 9JP UK	Television	LU
Tango TV (SVOD + TVOD)	Tango S.A. Boîte postale 32 L-8005 Bertrange	VOD	LU
TBN Ukraine	Russian Broadcasting Network, Inc. 2183 E. Village Road Holland - PA 18966-2932 USA	Television	LU
Teleshop 4			
Teleshop 5			
Teleshop 7	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	Television	NL
Teleshop 8			
Television X	MG Global Entertainment (Europe) Ltd The Junction, 4-10 Cowley Road Uxbridge, UB8 2XW UK	Television	IRL
Thane Direct	Thane Direct UK Thanet House 231-232 Strand London WC2R 1DA UK	Television	LU
The Craft Store (formerly Hochanda)	Hochanda Global Ltd Nene House Nene Valley Business Park Oundle, Peterborough, PE8 4HN UK	Television	LU
Théid&Co	Post Télécom S.A. 1, rue Emile Bian L-2996 Luxembourg	VOD	LU
TJC			
TJC Beauty	Shop TJC Ltd Surrey House Plane Tree Crescent Feltham, Middlesex TW13 7HF UK	Television	LU
Together TV	Together TV - The Community Channel 24 Neal Street London WC2H 9QW UK	Television	LU
TV One	Light Upon Light Media Ltd 208-212 Romford Road London, E7 9HY UK	Television	LU



Name of the service	Name of the service provider	Category	System for the protection of minors
TV Warehouse	TV Warehouse Ltd 6 Square Rigger Row, 1st floor London, SW11 3TZ UK	Television	LU
TV4	Network4 Media Group S.à r.l. 16a, avenue de la Liberté L-1930 Luxembourg	Television	LU
TVC News	TVC Communications 1 Continental Way Off CMD Road Ikosi-Ketu Lagos Nigeria	Television	LU
TVX 40+	MG Global Entertainment (Europe) Ltd The Junction, 4-10 Cowley Road Uxbridge, UB8 2XW UK	Television	IRL
Uelzechtkanal	Uelzechtkanal a.s.b.l. c/o Lycée de Garçons Esch 71, rue du Fossé L-4123 Esch-sur-Alzette	Television	LU
Ultra Nature	Mediawan Lux. S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg (formerly AB Entertainment S.A.)	Television	LU
Utsav Bharat	Star India Private Ltd London Office c/o STAR TV M/C 706	Television	LU
Utsav Gold (SD + HD)	3 Queen Caroline Street Hammersmith London W6 9PE UK		
Utsav Plus (SD + HD)			
Vavoom (Albanian version)	United Media S.à r.l. 6, rue Jean Monnet L-2180 Luxembourg	Television	LU
Vavoom (Bosnian version)			
Vavoom (Croatian version)			
Vavoom (Macedonian version)			
Vavoom (Serbian version)			
Vavoom (Slovenian version)			
Vavoom (Montenegrin version)			
Videoland	CLT-UFA S.A. 43, boulevard Pierre Frieden L-1543 Luxembourg	VOD	NL
Vox Africa	Vox Africa Ltd Battersea Studio 80 Silverthorne Road GB-London SW8 3HE UK	Television	LU
W (+1)	UKTV Media Ltd 10, Hammersmith Grove GB-London W6 7AP UK	Television	IRL
W (SD + HD)			



Name of the service	Name of the service provider	Category	System for the protection of minors
Xpanded TV	Visional Media Ltd 28-33 The Quadrant 135 Salusbury Road GB-London NW6 6RJ UK	Television	<i>LU</i>
XXX College XXX GirlGirl XXX Public Pickups	MG Global Entertainment (Europe) Ltd The Junction, 4-10 Cowley Road GB-Uxbridge, UB8 2XW UK	Television	<i>IRL</i>
Yesterday (+1) Yesterday SD	UKTV Media Ltd10, Hammersmith Grove GB-London W6 7AP UK	Television	<i>IRL</i>
Zee Cinema	ASIA TV Ltd (atl.esselgroup) 3rd Floor 14-15 Carlisle Street GB-London W1D 3BS UK	Television	<i>LU</i>
TOTAL			399





10
Abbreviations

Abbreviations

	English version	French version / translation
DMA	Digital Markets Act	<i>Règlement européen sur les marchés numériques</i>
DSA	Digital Services Act	<i>Règlement européen sur les services numériques</i>
EDMO	European Digital Media Observatory	<i>Observatoire européen des médias numériques</i>
EMFA	European Media Freedom Act	<i>Règlement européen sur la liberté des médias</i>
EMIL	EPRA Media and Information Literacy Taskforce	<i>Groupe de travail pour l'éducation aux médias et à l'information</i>
EPRA	European Regulators Group for Audiovisual Media Services	<i>Plateforme européenne des instances de régulation</i>
ERGA	European Platform of Regulatory Authorities	<i>Groupe des régulateurs européens des services de médias audiovisuels</i>
PEGI	Pan European Game Information	<i>Système d'évaluation européen des jeux vidéo</i>
REFRAM	French-speaking network of media regulators	<i>Réseau francophone des régulateurs de médias</i>
AMS	Audiovisual media service	<i>Service de médias audiovisuels</i>
SMC	Media, Connectivity and Digital Policy Department	<i>Service des médias, de la connectivité et de la politique numérique (auprès du ministère des Communications et des Médias)</i>
VOD	Video-on-demand	<i>Vidéo à la demande</i>
VSP	Video-sharing platform	<i>Plateforme de partage de vidéos</i>





Autorité
luxembourgeoise
indépendante de
l'audiovisuel

18, rue Erasme
L-1468 Luxembourg

www.alia.lu

T +352 247 - 70 105

M info@alia.etat.lu

