



**EUROPEAN BOARD
FOR DIGITAL SERVICES**

The Secretariat



Annual activity report of Consumer Protection and Technical Regulatory Authority pursuant to Article 55 of the DSA

01 January 2024 – 31 December 2024

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1. Introduction

General introduction DSA

'The Digital Services Act ("DSA") provides harmonised rules for a safe, predictable and trusted online environment when interacting with so called 'intermediary services', which includes e.g. online platforms, hosting services or search engines. Examples of such harmonised rules are (1) additional transparency requirements on how online platforms moderate content, (2) citizens' access to out-of-court settlements and (3) rules for the status of trusted flaggers and transparency obligations for trusted flaggers. The DSA also aims at preventing illegal content online, protecting minors online as well as preventing the spread of disinformation. Providers of Very Large Online Platforms ("VLOPS") and Very Large Online Search Engines ("VLOSES") face additional scrutiny, such as the obligation to provide transparency on advertisements or the publication of their assessment on systemic risks.

The DSA is enforced by the national Digital Service Coordinators ("DSCs"), other national regulators designated as competent authorities in their Member States and for VLOPS and VLOSES by the European Commission. Consumer Protection and Technical Regulatory Authority is the Digital Service Coordinator for Estonia.

The DSA has fully applied since 17 February 2024. However, the Consumer Protection and Technical Regulatory Authority has been the appointed Digital Services Coordinator since 1 July 2024. From then on, the CPTRA received the appropriate competences to verify compliance with the requirements coming from the DSA.

Background information

'Article 55 of the DSA requires every DSC to prepare and publish an annual report detailing its activities during the past year. The report must include information on complaints received under Article 53 of the DSA and more specific information such as the number and types of orders to act against illegal content or orders to provide information that were issued by national judicial or administrative authorities in the relevant Member State, according to Articles 9 and 10 of the DSA. The report should also include information on the actions taken in response to these orders, as communicated back to the DSCs.

The DSC will also share this report with the European Commission and the European Board of Digital Services.

For Member States that have designated several competent authorities to be responsible for the supervision and enforcement of the DSA, the DSC is required to consolidate the activities of all competent authorities into one comprehensive annual activity report.

In Estonia, the Consumer Protection and Technical Regulatory Authority only competent authority for the supervision and enforcement of the DSA.

However, every national surveillance authority can act in the framework of DSA within their competences (e.g. issue removal orders to service providers).

2.Complaints (Article 53 of the DSA)

Introduction

Article 53 of the DSA establishes the right of recipients of intermediary services, or any mandated organisation or association acting on their behalf, to lodge a complaint against providers of these intermediary services alleging an infringement of the DSA. Complaints should be directed to the DSC in the Member State where the recipient of the service is located or established.

The DSC will assess the complaint and, where appropriate, forward it to the DSC in the Member State where the provider of the intermediary services is established, possibly accompanied by an opinion. If the complaint falls under the responsibility of another competent authority within the same Member State, the DSC will transfer the complaint to the appropriate relevant authority.

Complaints in 2024

In 2024, the Consumer Protection and Technical Regulatory Authority received 4 complaints. In addition to the complaints the Consumer Protection and Technical Regulatory Authority received 28 inquiries regard rights and obligations arising from the DSA.

- Categorisation of the complaints

>Number of complaints handled by the **DSC**

Authority	Number of complaints handled
Consumer Protection and Technical Regulatory Authority – DSC	4

Consumer Protection and Technical Regulation Authority has handled 4 complaints.

>Categorization of the **total number of transmitted complaints by specific receiving DSC**

DSC in other Member State	Number of complaints transmitted to this DSC
IE, Coimisiún na Meán	3

Within the accounted for timeframe, 3 complaints have been transmitted to the Estonian DSA.

Complaints that led to formal investigations in 2024

In 2024, no complaints have led to the opening of a formal investigation either by the Estonian Consumer Protection and Technical Regulatory Authority or any other national competent authority.

3.Orders (Article 9 and 10 of the DSA)

Introduction

Article 9 of the DSA outlines the obligations of providers of intermediary services when they receive an order from national judicial or administrative authorities to act against illegal content. First, when a provider receives such an order, they must inform the issuing authority (or another specified authority) about any effect given to the order, specifying if and when effect was given to the order. The article also sets conditions for the orders issued by national authorities.

The issuing authority, or another specified authority if this is stated in the order, must share the order and any information about its implementation with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

Article 10 of the DSA obliges providers of intermediary services are obligated to promptly inform the relevant national judicial or administrative authority, or any other authority specified in the order, upon receiving an order to provide specific information about individual recipients of their services. The article also sets conditions for the orders issued by national authorities. Similarly to Article 9 DSA, Art 10 DSA also sets conditions for the orders issued by national authorities. The issuing authority, or another specified authority if this is stated in the order, must also share the order and any information about its implementation with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

In 2024, Consumer Protection and Technical Regulatory Authority as a digital services coordinator did not receive any orders pursuant to Article 9 or pursuant to Article 10 of the DSA from other national authorities.

However, Consumer Protection and Technical Regulatory Authority as a national surveillance authority in implementation of EU sanctions issued one removal order to Telegram regarding providing access to 14 sanctioned media services.

There was a hearing done for TikTok, which solved the issue, therefore an order of removal was not necessary. Therefore in 2024 there was only 1 order of removal.

Effects given to the orders

Telegram responded to the removal order more than three months later confirming the 14 sanctioned media services have been geo-blocked in European Union.

4.Out-of-court dispute settlement bodies (Article 21 of the DSA)

Introduction

Under the DSA, out-of-court dispute settlement bodies offer an additional opportunity for users to resolve content moderation disputes with online platforms. Online platforms must inform users of this option for resolving problems and are also required to cooperate with the procedures of certified dispute settlement bodies. Upon request, DSCs certify dispute

settlement bodies located in their Member State if they meet the statutory requirements set out in Article 21 of the DSA. For example, the dispute settlement bodies must be independent. In addition, they must have sufficient expertise, for example, in a certain type of illegal content. Dispute settlement bodies must handle disputes in at least one official EU language.

Certification of out-of-court dispute settlement bodies in 2024

In 2024, the Consumer Protection and Technical Regulatory Authority did not certify any out-of-court dispute settlement bodies.

5. Trusted Flaggers (Article 22 of the DSA)

Introduction

Under the DSA, trusted flaggers are responsible for detecting potentially illegal content and alert online platforms. They are experts at detecting certain types of illegal content online, such as hate speech or terrorist content, and notifying it to the online platforms. The notices submitted by them must be treated with priority by online platforms as they are expected to be more accurate than notices submitted by an average user. The DSC of the Member State of establishment of the applicant entity awards the trusted flagger status. DSCs oversee the application process, ensuring entities meet the criteria laid down in Article 22 of the DSA, such as independence from any online platform or specific expertise. Pursuant to Article 22 (8) of the DSA, the Commission, after consulting the Board, shall, where necessary, issue guidelines to assist providers of online platforms and Digital Services Coordinators in the application of these criteria. The guidelines are scheduled to be adopted in Q2 2025.

In 2024, the Consumer Protection and Technical Regulatory Authority received one application for Trusted Flagger status. However, during the procedure, the applicant decided to withdraw its application. In 2024 the CPTRA reached out to multiple civil societies, introducing the opportunities the status possibly gives, however due to budget restrictions of the organisations, the opportunities are currently on hold.

6. Vetted researchers (Article 40 of the DSA)

Introduction

Vetted researchers are researchers that have the right to access non-public data for their research on systemic risks or measures to mitigate them at the Very Large Online Platforms and Search Engines. Systemic risks are risks that can inflict serious harm to society or the economy at large, for example the widespread dissemination of illegal content or election interference. In order to gain access to relevant data, the DSC of the Member State of establishment of the specific Very Large Online Platform or Search Engines can grant the status to a researcher when the researcher has demonstrated to meet the conditions laid down in Article 40 of the DSA. Very large online platforms and search engines are required to give researchers access to that data to the researchers that have been granted the status of vetted researcher.

Status granted to vetted researchers in 2024

In 2024, the Consumer Protection and Technical Regulatory Authority did not receive any applications from vetted researcher.

7. Enforcement and (inter)national activities

Introduction

In 2024, DSCs and other competent authorities engaged in a range of enforcement activities, complemented by various international and national initiatives, both formal and informal, aimed at fostering compliance, enhancing cooperation, and ensuring the effective implementation of the DSA.

Enforcement activities and investigation powers used in 2024

The CPTRA did not have any regulatory supervisory proceedings as a DSA or CA. However, there were proceedings as a national law enforcement agency, in advertising oversight, we focused on monitoring misleading ads that impersonated media service providers and used images of well-known public figures without permission. In 2024, Meta was notified of 60 such ads published on Facebook.

Additionally in July of 2024, there was an issue with Estonian Public Broadcasting article not opening on Facebook platform. The article contained information regarding Estonian Internal Security Service. The CPTRA was in close contact with Facebook, the European Commission and Irish DSC, the problem was solved within days.

National activities in 2024

In 2024 the CPTRA concluded a market analysis for Estonian enterprises, that fall under the DSA regulatory scope of application. Additionally, several guidelines were drafted and shared publicly via the official website containing information for hosting services, mere conduit services and digital platforms. The guidelines can be found here:



DSA meelespea
digiplatvormidele.pdf



DSA meelespea
pelgalt edastajale.pdf



DSA meelespea teabe
talletajatele.pdf

The information was also communicated to hosting and mere conduit services providers and digital platforms, to make them aware of any possible compliance requirements coming from the DSA.

In addition to providing information to service providers, the CPTRA also conducted an in-depth DSA training for all government agencies, including a training on drafting orders in line with DSA article 9 and 10, forwarding them to service providers and other subsequent activities.

International activities

European Board for Digital Services

The European Board for Digital Services (the "Board") aims to contribute to a safe, predictable, and trusted online environment that promotes innovation while safeguarding the protection of fundamental rights. Through the Board, the European Commission and the Digital Services Coordinators work together as a cohesive team, adopting a European approach to the enforcement of the DSA. The Board thus plays a vital role in ensuring the consistent application of the DSA across the European Union, benefiting all European citizens, society, and the economy.

The Board is the platform for discussing all relevant issues and priorities regarding the application of the DSA. Close, trustful cooperation and coordination, taking into account the specific impact of intermediary services in individual Member States, are essential for effective and coherent enforcement of the DSA throughout the European Union.

For DSCs participating in the Board, it is important to actively contribute to this process. Board members support, advise, and assist the European Commission and the other DSCs in their supervisory tasks. They provide each other with insights and expertise, consult external experts when necessary, and contribute to the analysis of emerging issues related to digital services within the internal market. Therefore, participation in the Board requires an active role in collaboration and working together to ensure DSA compliance, with attention to the specific context of each Member State.

In 2024, the European Board for Digital Services held a total of 12 meetings.¹ These meetings served as a critical platform for discussing the ongoing implementation and enforcement of the Digital Services Act (DSA) across the European Union. The meetings provided an opportunity for Board members to engage in in-depth deliberations on a variety of issues and priorities related to the digital services landscape. Each meeting played a significant role in advancing the collective goals of ensuring a safe, transparent, and innovative digital environment across the EU.

Consumer Protection and Technical Regulatory Authority attended all Board meetings. In addition, Consumer Protection and Technical Regulatory Authority has participated in

¹ <https://digital-strategy.ec.europa.eu/en/policies/dsa-board> - European Board for Digital Services

most of the eight Working Groups that have been established under the Board² and contributed as a drafter to the work of Working Group 4 regard developing Election Toolkit.

The CPTRA also concluded multiple meetings with DSC-s from other member states. For example, there was a meeting held with the Belgium DSC BIPT to discuss the matter of Telegram.

There was also a Baltic nations meeting held with Latvian and Lithuanian DSC-s, during which challenges related to the implementation of the Digital Services Act were shared and best practices were exchanged.

8. Conclusions

2024 was the first year for the Digital Services Act to be implemented, which mostly made it a year of integration into national law. As a small country, CPTRA did not receive many complaints, the number of complaints was 4 and number of inquiries 28. During the year the CPTRA made efforts to introduce and train national government agencies on implementing DSA. There was also significant groundwork and information sharing done to service providers, who must comply with the new regulations and need the guidance in implementing the Digital Services Act.

² <https://digital-strategy.ec.europa.eu/en/policies/dsa-board-working-groups>