



Coimisiún
na Meán

Annual Activity Report

Pursuant to art. 55 of the Digital Services Act

1 January to 31 December 2025



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Introduction

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 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 assess and mitigate systemic risks stemming from their services and

The DSA is enforced by the national Digital Services Coordinators (DSCs), other national regulators designated as competent authorities in their Member States, and for VLOPS and VLOSES by the European Commission. Coimisiún na Meán (An Coimisiún) was designated as the DSC in Ireland in February 2024. The Competition and Consumer Protection Commission (CCPC) has been designated, pursuant to Article 49, as the competent authority for the purpose of Articles 30, 31 and 32 of the DSA, which relate to online marketplaces.

An Coimisiún is publishing this activity report pursuant to Article 55 of the DSA, which requires every DSC to prepare and publish an annual report detailing its activities during the previous year. The report includes information on complaints received under Article 53, as well as 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 also includes information on the actions taken in response to these orders, as communicated back to the DSCs.

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. This report incorporates all relevant information and data as provided by the CCPC, who is the competent authority in respect of Articles 30, 31 and 32.

An Coimisiún will share this report with the European Commission and the European Board of Digital Services.



Complaints (Article 53 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 a different authority within the same Member State, the DSC will transfer the complaint to the appropriate relevant authority.

Complaints in 2025

In 2025, An Coimisiún received 855 DSA related complaints. An Coimisiún transmitted 6 complaints to Autoriteit Consument en Markt (ACM) as DSC for Netherlands, 1 complaint to Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen (BNetzA) as DSC for Germany, and 1 complaint to the Post-och telestyrelsen as DSC for Sweden. An Coimisiún also transmitted 2 complaints that concerned Articles 30 and 31 of the DSA to the CCPC.

Activities of the Competition and Consumer Protection Commission (CCPC)

During the reporting period, the Competition and Consumer Protection Commission (CCPC), in its capacity as a competent authority under the DSA, contributed to the supervision and enforcement framework coordinated by An Coimisiún.

The CCPC also received one regulatory communication (message) via Agora from France concerning alleged breaches of Article 30 of the DSA. In response, the CCPC engaged directly with the French DSC, ARCOM (Autorité de régulation de la communication audiovisuelle et numérique), and the French competent authority DGCCRF (Direction générale de la concurrence, de la consommation et de la répression des fraudes). The CCPC is actively working to resolve the issues identified.

- As part of its proactive compliance activities, the CCPC undertook a focused screening exercise (sweep) to assess compliance with the obligations set out in Article 30 of the DSA. Further details on this sweep will be published on the CCPC website.
- The CCPC actively participated at EU level, including as a member of Working Group 5 (WG5) of the European Board for Digital Services – ‘Consumers and online marketplaces’. Additionally, the CCPC is an active member of WG5 Workstream 1 ‘Mapping of national authorities’ and Workstream 2 ‘Online scams and fraud’.
- The CCPC participated in ongoing meetings with the European Commission and An Coimisiún in relation to the supervision and enforcement of the DSA.
- The CCPC also attended joint regulatory meetings with An Coimisiún, the European Commission and very large online platforms (VLOPs) established in Ireland, supporting coordinated regulatory engagement at national and EU level.

Further information on the CCPC’s activities in its role as a competent authority under the DSA is published in the CCPC’s own annual reports. Please check the CCPC website for more information.



Complaints that led to formal investigations in 2025

An Coimisiún's Investigations Team commenced a formal investigation on 12 November 2025 into the provider of the X online platformX., under the EU DSA. The investigation will assess whether X has contravened Article 20 of the DSA.

The investigation arises from concerns held by An Coimisiún's Platform Supervision Team, regarding X's compliance with Article 20 of the DSA. These concerns are supplemented by information provided by an NGO, HateAid and a user complaint.

Orders (Articles 9 and 10 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 and also sets out obligations for DSCs. 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 received from the provider about its implementation, with the DSC in the Member State of the issuing authority. The DSC must then share this information with all other DSCs.

Article 10 DSA outlines the obligations of providers of intermediary services when they receive an order to provide specific information about individual recipients of the service. When they receive an order to provide information, providers of intermediary services must promptly inform the relevant national judicial or administrative authority, or any other authority specified in the order of its receipt and of the effect given to the order, specifying if and when effect was given to the order. Similarly to Article 9 DSA, Article 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 received from the provider about its implementation, with the DSC in the Member State of the issuing authority. The DSC must then share this information with all other DSCs.

In 2025, An Coimisiún did not receive information in relation to orders issued under Articles 9 and 10 or effects given to those orders.

An Coimisiún have been active participants of EBDS Working Group 7 inputting into the implementation of Articles 9 and 10. An Coimisiún have been actively raising awareness on Articles 9 and 10 of the Digital Services Act with a number of external stakeholders throughout the year and this campaign of information sharing and raising awareness continues.



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

Introduction

Out-of-court dispute settlement (ODS) bodies offer an 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.

Certification of out-of-court dispute settlement bodies in 2025

As of the date of this report, An Coimisiún has certified one ODS body, namely the Appeals Centre Europe ("ACE"). In 2025 An Coimisiún did not reject any ODS body applications and did not revoke any certifications pursuant to Article 21 of the DSA.

During 2025, An Coimisiún engaged regularly with the certified ODS body, ACE as well as other stakeholders involved in the implementation of the ODS process including VLOPS and VLOSES established in Ireland DSCs in other member states, the European Board for Digital Services and ODS bodies certified in other jurisdictions. The aim of these engagements was to work collaboratively to address some of the challenges arising from the practical implementation of Article 21.

During 2025, An Coimisiún held information sessions regarding the right to redress under the DSA, including the right to engage with the ODS process, with a broad range of key stakeholders including state agencies, peer regulators and NGOs.

An Coimisiún has published guidance and a FAQ document in respect of out-of-court dispute settlement bodies. The guidance can be accessed [here](#) and the FAQ document can be accessed [here](#).

Trusted Flaggers (Article 22 DSA)

Introduction

Under the DSA, providers of online platforms must have in place mechanisms to allow Trusted Flaggers submit notices about potentially illegal content, and such notices by Trusted Flaggers must be treated with priority by online platforms. 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 conditions laid down in Article 22 of the DSA; e.g they are experts at detecting certain types of illegal content online.. DSCs must communicate to the Commission and the European Board of Digital Services the names and contact details of to entities to which they have awarded status of Trusted Flagger, or of any Trusted Flaggers whose status they have suspended or revoked.

Status granted to Trusted Flaggers in 2025

In 2025, An Coimisiún awarded trusted flagger status to one entity, The Central Bank of Ireland, and published an [Information Note](#) regarding the decision to award the status to this entity. The Central Bank's designated area of expertise is financial scams and fraud, including the provision and/or offer of financial services without authorisation. The duration of the status is three years, commencing 2 April 2025 to 2 April 2028.



An Coimisiún has taken a proactive approach to raising awareness of the Trusted Flagger status by way of individual and collective information sessions with a wide range of stakeholders. In December 2025, An Coimisiún held a Trusted Flagger event which provided a forum for participants to gather and share insights and experience related to trusted flagger status, activities and challenges.

An Coimisiún has published guidance and a FAQ document in respect of Trusted Flaggers. The guidance can be accessed [here](#) and the FAQ document can be accessed [here](#).

Vetted Researchers (Article 40 DSA)

Introduction

Vetted Researchers are researchers that have been provided with access to data for their research on systemic risks or measures to mitigate them at the VLOPS and VLOSES. Examples of systemic risks are the dissemination of illegal content, negative effects for the exercise of fundamental rights, civic discourse, electoral processes, gender-based violence, protection of public health and minors or serious negative consequences to a person's physical health and mental well-being. In order to gain access to data, the DSC of the Member State of establishment of the specific VLOP or VLOSE can grant the status of vetted researcher when the researcher has demonstrated the conditions laid down in Article 40(8) DSA. VLOPS and VLOSES are required to give researchers access to data to the researchers that have been granted the status of vetted researcher.

The European Commission adopted a Delegated Act for vetted researcher access to data under Article 40 on 1st July 2025 outlining the rules granting access to data for vetted researchers and setting out which information Digital Services Coordinators (DSCs), VLOPs and VLOSEs must make public to facilitate vetted researchers' applications to access relevant datasets.

Status granted to vetted researchers in 2025

An Coimisiún has not yet granted the status of vetted researcher to any individual.

Enforcement

Introduction

In 2025, DSCs and other competent authorities engaged in a range of supervision and 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.

The supervision and enforcement of the DSA is carried out by the Platform Supervision and Investigations (PS&I) Unit within An Coimisiún. Supervision and Investigations are two distinct functions.

Supervision activities in 2025

In 2025, An Coimisiún actively engaged with regulated entities within its regulatory remit to ensure compliance with the DSA. An Coimisiún has adopted a risk-based approach to supervision, whereby it focuses its supervisory resources on entities which pose the greatest risks to online users, whilst maintaining supervisory presence across all intermediary service providers.



During 2025, An Coimisiún carried out a broad range of supervisory activities covering both VLOPS/VLOSES, and other intermediary service providers (ISPs) established in Ireland. The most notable supervisory activities include:

- Following the opening of a review in 2024 into the compliance of a number of online providers with Article 16 of the DSA, An Coimisiún has requested information from several of those based in Ireland - including VLOPS and VLOSES - to ensure that people have a right to report content that they suspect to be illegal, through an accessible and user-friendly reporting mechanism. This review has resulted in several actions in 2025, such as enhanced engagement, Requests for Information (RFIs), Supervisory concern letters, and also the opening of two investigations (into two VLOPs). Some providers have made significant changes to their reporting mechanisms for illegal content following engagement with An Coimisiún. An Coimisiún is currently assessing these changes for their effectiveness.
- Focusing on the European Commission's Article 28 Guidelines, and our Guidelines implementation strategy, with the protection of minors being a priority area for An Coimisiún:
- We have initiated a project to review and engage with platforms established in Ireland (excluding VLOPS and VLOSEs) on the implementation of the the Article 28 Guidelines. This will continue in 2026 and includes proactive compliance checks and intensified regulatory dialogue.
 - In collaboration with the European Commission and other DSCs, we commenced a coordinated action on pornographic platforms, with each DSC focusing on nationally established services. In 2025 this included the identification and jurisdictional mapping of relevant services established in Ireland, and initial outreach.
- Overseeing VLOPs and VLOSEs' preparations for the Irish Presidential election, in relation to their obligation to assess and mitigate systemic risks relating to electoral integrity. This involved an election roundtable with representatives from the regulated entities, other regulators, and civil society organisations. An Coimisiún also supported election roundtables in other Member States.
- In 2024, we commenced an ongoing program of ISP identification and categorisation of services for non-VLOP/VLOSE entities. We used this information to engage with approximately 400 services to seek compliance with basic obligations. In 2025, the Supervision team conducted four rounds of basic compliance assessments on all identified online platforms. These assessments considered the publication of AMARs, the availability of Single Point of Contact information, the transparency information on advertising, and the publication of Transparency Reports. Where compliance was not identified we engaged with online platforms to see improvements or to notify them of the obligations. This work will be expanded on in 2026. For this project, in 2025, 146 letters were sent to services related to basic compliance assessment initiatives and this work continues.
- Other supervisory activity was conducted in 2025 in accordance with our risk-based approach, focusing on priority providers and thematic areas of concern. This included enhanced engagement, sending out RFIs and supervisory concern letters, and other outreach activities.
- Reviewing the Risk Assessments and Audits submitted by VLOPS and VLOSES which outline how they identify and address risks as well as their compliance with the standard obligations and general implementation of the DSA. As in 2024, we also gathered information from other DSCs and authorities, from civil society and from users to understand where platforms may be falling short.
- Maintaining regular engagement with other national bodies, as is relevant to the performance of An Coimisiún's duties, in relation to the supervision of intermediary service providers under the DSA. This includes the CCPC, the Data Protection Commission, An Garda Síochána, the Electoral

Commission, the Department of Enterprise, Trade and Employment, the Department of Justice and the Central Bank of Ireland.

In 2025, An Coimisiún continued to collaborate closely with the European Commission and other DSCs, including in the context of the European Board for Digital Services, to informally share mutually beneficial information on emerging risks, supervisory practice and specific issues such as elections, protection of minors and difficulties for users related to reporting illegal content.

Enforcement activities and investigation powers used in 2025

In 2025 An Coimisiún commenced 3 investigations pursuant to Part 8B of the Broadcasting Act 2009, as amended. The investigations were commenced against VLOPS and VLOSES and concerned alleged contraventions of Article 16, 20 and 25 of the DSA.

In addition, in 2024 An Coimisiún received and accepted two requests for assistance under Article 66.3 of the DSA to assist the European Commission in its investigations. Continued assistance was provided by An Coimisiún to the European Commission in respect of both of these requests throughout 2025.

International and domestic 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 DSCs work together as a cohesive team, adopting a European approach to the supervision and 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 2025, the Board held a total of 8 [meetings](#), including 2 ad hoc meetings. These meetings served as a critical platform for discussing the ongoing implementation, supervision and enforcement of the 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.



An Coimisiún attended all Board meetings. In addition, experts of An Coimisiún have participated in all Working Groups that have been established under the Board, in particular:

- Continued as Vice-Chair of EBDS Working Group (WG) 6 related to Protection of Minors, where we have worked with the Chair to establish a coordinated action on pornographic platforms, provided detailed feedback on the Article 28 guidelines and worked with the Chair to agree an implementation strategy and propose deliverables for the Article 28 guidelines.
- Took over the Vice-chair role of WG8 on IT and Agora.
- Played a substantive role in WG3 to develop a harmonised approach among DSCs to assessing data access applications under Art 40(4) and have engaged intensively with other DSCs, researchers and The European Commission since the application process opened in October 2025.
- Led the establishment of a new workstream under WG3 to harmonise best practice for ODS certification, which will start in 2026.
- Played a substantive role in the development of complaints-handling best practice under WG2
- Led the establishment of a new workstream under WG1 to develop agreed compliance standards for Art. 16 Notice and Action Mechanisms, which will start in early 2026.
- Member of the WG4 drafters' group that developed the Elections Toolkit, published in Feb 2025.
- Worked with the EC and other DSCs to create a space for CSO engagement in the EBDS structures.

Other International and domestic activities in 2025

In addition to our active participation in the European Board for Digital Services, in 2025, An Coimisiún participated in several workshops organised by the European Commission, including a workshop of the Communications Network, DSC training, data access workshop and a risk assessments workshop. In 2025, An Coimisiún engaged extensively in DSA-focused international cooperation, contributing to discussions on enforcement, CSO engagement, systemic risks, elections, and researcher data access. Key engagements included speaking at the European Parliament IMCO Public Hearing on DSA implementation and enforcement and participation in the CERRE Digital Platforms Summit. An Coimisiún also contributed expertise at the IIEA event “DSA: One Year in Force”, a DSA Out-of-Court Dispute Resolution Conference, and the Centre for Democracy and Technology’s CSO Roundtable. An Coimisiún also supported implementation of the election guidelines and elections toolkit through exchange and sharing with other DSCs.

An Coimisiún strengthened bilateral and multilateral cooperation with regulators and governments. This included regular bilateral engagement with other DSCs and the European Commission as well as DSA-focused exchanges including with the French, Dutch and Danish government representatives. An Coimisiún also played a prominent role in global policy events where DSA themes were central—such as RightsCon, UNESCO/ASEAN conference on platform governance, Florence Forum of Digital Regulation and Hertie School/Columbia University workshops on researcher/regulator collaboration.

