



Coimisiún  
na Meán

# Annual Activity Report

Pursuant to art. 55 of the Digital Services Act

1 January to 31 December 2024



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# Introduction

The Digital Service Act (DSA) came into force for all platforms in February 2024, with the exception of Very Large Online Platforms (VLOPS) and Very Large Online Search Engines (VLOSES), who became subject to the DSA in August 2023. The 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 the privacy, safety and security of children, as well as preventing the spread of disinformation. VLOPS and VLOSES face additional scrutiny, such as the obligation to provide transparency on advertisements or the publication of their assessment of systemic risks.

The DSA is enforced by the national Digital Services Coordinators, 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.

Since the full implementation of the DSA, An Coimisiún has been building a DSA complaints team and processes and procedures in handling complaints. In February 2024, An Coimisiún began intake of complaints on a national level, as well as via the EU information sharing system, AGORA. An Coimisiún processes all complaints in line with its national legislation, the Broadcasting Act 2009, as amended (“the 2009 Act”). Under the 2009 Act, An Coimisiún must carry out a number of steps in relation to a complaint. This includes an initial assessment of the complaint, a further assessment of the complaint, and notification to both the complainant and intermediary service provider of its proposed action and final decision on the complaint. An Coimisiún also seeks representations from the intermediary service provider on its proposed action and considers those representations in advance of making a final decision. Given the number of intermediary service providers based in Ireland, complaint numbers are significant in our jurisdiction.

An Coimisiún has held numerous meetings with DSCs on complaint handling matters and is also working actively in the European Board for Digital Services to develop agreed complaint-handling procedures between DSCs.

## Complaints in 2024

In 2024, An Coimisiún received 322 complaints. An Coimisiún transmitted one complaint to the German DSC (Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen) and 12 complaints that concerned Articles 30 and 31 of the DSA to the CCPC. No complaints concerning Article 32 were received by An Coimisiún necessitating transmission to the CCPC.

In accordance with national legislation, the CCPC carried out an assessment of the 12 complaints. For each complaint, the CCPC issued a notification to the online marketplaces the subject of the complaint inviting it to make representations to the CCPC about the complaint. In deciding the action to take, the CCPC must consider the representations received.

## Complaints that led to formal investigations in 2024

In 2024, neither An Coimisiún nor the CCPC launched a formal investigation stemming from a complaint received under Article 53.



## Orders (Articles 9 and 10 DSA)

### Introduction

Article 9 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 DSA obliges providers of intermediary services 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 of its receipt and of the effect of the order. The article also sets conditions for the orders issued by national authorities. 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 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, An Coimisiún did not receive any orders pursuant to Article 9 and Article 10 of the DSA. Staff from An Coimisiún have been active participants of Working Group 7 inputting to the implementation of Articles 9 and 10.

### Effects given to the orders

In 2024, An Coimisiún did not receive information in relation to orders issued under Articles 9 and 10.

## 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 the possibility for redress through ODS when it issues its content moderation decision to the user. Under Article 21 of the DSA, upon review of an application by a body, the DSC of establishment may certify it if the body meets the requirements set out in Article 21.

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

In 2024, An Coimisiún certified one ODS body – the Appeals Centre Europe (ACE). ACE is an entity located in Ireland. The certification permits ACE to settle disputes relating to content moderation decisions of online platforms. ACE's certification is valid for five years. The official languages of the institutions of the EU in which the ACE is capable of settling disputes are English, French, German, Spanish, Italian and Dutch. ACE can review content that is the subject matter of a dispute in any language within the EU. ACE began work in November 2024, by accepting disputes in respect of TikTok, Facebook and YouTube.



Details on An Coimisiún's decision to certify ACE can be accessed [here](#). In 2024, An Coimisiún published guidance and a FAQ document in relation to the certification of ODS bodies pursuant to Article 21 of the DSA. The guidance and the FAQ document can be accessed [here](#).

In 2024, An Coimisiún did not reject any ODS body applications and did not revoke any certifications pursuant to Article 21 of the DSA.

## Trusted Flaggers (Article 22 DSA)

### Introduction

Under the DSA, Trusted Flaggers are empowered to detect 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 conditions laid down in Article 22 of the DSA.

### Status granted to Trusted Flaggers in 2024

In 2024, An Coimisiún did not award Trusted Flagger status to any entity, and did not reject any Trusted Flaggers applications. There were no revocations of Trusted Flagger status in 2024.

In 2024, An Coimisiún 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](#). During 2024, An Coimisiún engaged intensively with parties interested in the Trusted Flaggers status, by way of one-to-one meetings and an open-door information event held in September. The FAQ document was developed based on the feedback received during those engagements.

## Vetted Researchers (Article 40 DSA)

### Introduction

Vetted Researchers are researchers that have the right to access non-public data for their research of VLOPS and VLOSES that contributes to the detection, identification and understanding of systemic risks or measures to mitigate them. Examples of systemic risks are the dissemination of illegal content, negative effects for the exercise of fundamental rights, civic discourse, electoral discourse, gender-based violence, protection of health and minors or well-being. In order to gain access to relevant 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.



## Status granted to vetted researchers in 2024

DSCs are currently waiting for the publication of a Delegated Act from the European Commission, expected in 2025. Therefore, no vetted researchers were granted status in 2024. During 2024, An Coimisiún actively prepared for the implementation of the vetted researchers process. An Coimisiún made a public submission on the call for evidence for feedback relating to the draft Delegated Act. An Coimisiún also participated in a researcher/platform roundtable hosted by the European Commission. An Coimisiún has taken a role in the Memorandum of understanding (MoU) drafting sub-group under Working Group 3 of the European Board for Digital Services. This group aims to produce a MoU between DSCs to achieve harmonisation in procedures and approaches to application review across DSCs.

## Enforcement

### Introduction

In 2024, 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 2024

Since its designation, 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 2024, An Coimisiún carried out a broad range of supervisory activities covering both VLOPS/VLOSES, and other ISPs established in Ireland. The most notable supervisory activities include:

- Sending 18 official requests for information (RFIs) to platforms established in Ireland including VLOPS and VLOSES, as well as requesting information during our regular supervisory engagements, to examine compliance with Articles 12 and 16 of the DSA. An Coimisiún are now completing the information gathering phase and will engage with the platforms to ensure that their reporting mechanisms and point of contacts comply with the requirements of the DSA.
- Overseeing VLOPS and VLOSES' preparations for the local, European, and general elections, in relation to their obligation to assess and mitigate systemic risks relating to electoral integrity. Information integrity was a priority for 2024 and fed into this work. This involved two election roundtables with representatives from the regulated entities, other regulators, and civil society organisations. An Coimisiún also supported election roundtables in other Member States.
- 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. We also gathered information from other DSCs and authorities, from civil society and from users to understand where platforms may be falling short.



- Commencing an ongoing program of intermediary service provider 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, including points of contact for users, regulators, and transparency requirements.
- Developing an internal assessment questionnaire, applicable to all intermediary service providers, with a view to assessing compliance with specific obligations. This iterative tool has been and will continue to be updated to best reflect understanding of the DSA and any updated guidance. To date, this has led to engagement and compliance improvement with five ISPs, including national and international services. This work is ongoing with new assessments commencing each quarter.
- Establishing 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 especially around Art 18 DSA, the Electoral Commission, the Department of Enterprise, Trade and Employment, the Department of Justice and the Central Bank of Ireland.

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

## **Enforcement activities and investigation powers used in 2024**

An Coimisiún has received and accepted two requests for assistance under Article 66.3 of the DSA to assist the European Commission in its investigations.

# **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 2024, the Board held a total of 12 meetings.<sup>1</sup> 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<sup>2</sup>. in particular:

- An Coimisiún is Vice-Chair of the European Board for Digital Services Working Group 6 related to Protection of Minors, where we have assisted to coordinate DSC input into the forthcoming European Commission Guidelines on Article 28 DSA. We were a member of the Elections Toolkit editorial group under Working Group 4 and are a member of the drafters' group for the Data Access MoU under Working Group 3. An Coimisiún also participated in a number of workshops and roundtables organised by the European Commission, including a number of Elections roundtables and stress tests organised by the EC and DSCs in advance of European and national elections.
- An Coimisiún participated in the training on the DSA for accession countries organised by the European Commission, where we shared our experiences of managing complaints under the DSA and developing our approach to certifying Trusted Flaggers.
- An Coimisiún held regular bilateral meetings with DSCs on complaints and ad-hoc exchanges with DSCs on issues including data access, election preparedness, ODS certification, and monitoring techniques.

## International and domestic activities

In addition to our active participation in the European Board for Digital Services, in 2024, An Coimisiún invested significantly in international activities in the EU and beyond to promote awareness of the DSA and An Coimisiún's role in its enforcement, exchange learning and best practice with DSCs and other regulators, build linkages with relevant civil society, industry, and research stakeholders, and encourage regulatory coherence with other online safety regulators. The most notable activities were:

An Coimisiún participated in several DSA-related events organised by civil society and research stakeholders. These included:

- Centre for Democracy and Technology DSA Roundtable, on approaches to enforcement and Vetted Researcher data access.
- European Digital Media Observatory annual conference, on media literacy and vetted researcher data access
- Sciences Po-led workshop with leading US/EU academics on approaches to DSA enforcement
- Safer Internet Forum, on protection of minors online
- The European University Institute's launch of a DSA Taskforce, on emerging approach to DSA enforcement

An Coimisiún was a key speaker on DSA-related issues at notable industry, regulatory and civil society fora, including:

- Computers, Privacy, Data Protection Annual Conference, Brussels
- Centre for Countering Digital Hate Global Summit, Washington DC

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<sup>1</sup> <https://digital-strategy.ec.europa.eu/en/policies/dsa-board>

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



- Deloitte Digital Platforms Compliance Forum, London
- International Institution of Communications, Washington DC
- ISD Digital Policy Summit on vetted researcher data access and emerging regulatory practice
- International Association of Privacy Professionals Europe Data Protection Congress, Brussels
- European Interactive Digital Advertising Alliance Annual Summit, London

We rolled out two public awareness campaigns on user rights in relation to the DSA, one focusing on reporting and flagging mechanisms, and the second on children's rights.

In May 2024, we signed a Cooperation Agreement with the CCPC. This agreement establishes a framework of cooperation, information sharing and constructive communication between both parties to assist them in discharging their respective functions relating to the Digital Services Act. The agreement can be accessed [here](#).

The CCPC published on its [website](#), guidance outlining the provisions of Article 30, 31 and 32. The CCPC attended two meetings of the Working Group 5 of the European Board for Digital Services – Consumers and online marketplaces. Working Group 5 deals with the interplay between the Digital Services Act and the Consumer Protection legislation, in particular regarding Articles 30-32 of the DSA. This includes the cooperation with consumer protection, customs, market surveillance and other relevant authorities.

CCPC engaged with An Coimisiún with regard to competent authority-level access to AGORA and provided input into the Commission's survey "Agora Update for Competent Authorities Requirements" on priorities.

