



Coimisiún
na Meán

Information Note re the decision to certify Impress Dispute Resolutions as an Out-of-Court Dispute Settlement Body pursuant to Article 21 of the Digital Services Act

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Introduction

On 14 May 2026, Coimisiún na Meán (“An Coimisiún”) certified [Impress Dispute Resolutions Limited](#) (“IDR” or “the Applicant”) as an Out-of-Court Dispute Settlement (“ODS”) body pursuant to Article 21 of the Digital Services Act (“DSA”). This note provides information about the key aspects of the application and the information that An Coimisiún focused on during the assessment process to arrive at its decision.

Article 21 of the DSA entitles recipients of an online platform service to select a certified ODS body to resolve disputes relating to certain decisions of online platforms taken in response to a notice or on:

- a. whether or not to remove or disable access to or restrict visibility of information uploaded to the online platform;
- b. whether or not to suspend or terminate the provision of the service, in whole or in part, to the service recipients;
- c. whether or not to suspend or terminate the service recipients’ account;
- d. whether or not to suspend, terminate or otherwise restrict the ability to monetise information provided by the service recipients.

This includes decisions relating to complaints that have not been resolved by means of the internal complaint-handling system of an online platform.

The decisions of ODS bodies are not binding.

An Coimisiún has the power to certify an applicant as an ODS body, where the applicant meets the following conditions:

- a. Impartiality and independence, including financial independence, in relation to providers of online platforms and recipients of the service.
- b. Expertise in relation to areas of illegal content, or in relation to the application and enforcement of terms and conditions of online platforms.
- c. Remuneration, which requires that ODS body members are remunerated in a way that is not linked to the outcome of the procedure.
- d. Accessibility, which requires that the ODS settlement is easily accessible, through electronic communications technology and provides for the possibility to initiate the dispute settlement and to submit the requisite supporting documents online.
- e. Swift, efficient and cost-effective dispute settlement, which requires that the ODS body can settle disputes in a swift, efficient, and cost-effective manner and in at least one of the official languages of the institutions of the Union.
- f. Clear and fair rules, which requires that the ODS settlement takes place in accordance with clear and fair rules of procedure that are easily and publicly accessible.

Further information about the obligations of ODS bodies and online platforms related to the out-of-court dispute settlement process can be found in [Article 21 of the DSA](#) and in the [FAQ Document](#) published by An Coimisiún.

Information about Impress Dispute Resolutions

The Applicant is a private company limited by shares, registered in Ireland, with the company registration number 757060. The Applicant has a single shareholder, the UK entity Impress CIC which operates as an independent monitor of the media. Impress CIC allocated a part of its fixed annual grant (a multi-year funding agreement) provided by the Independent Press Regulation Trust to cross-fund the creation of IDR.

The Applicant was certified as an ODS body on 14 May 2026, for a period of five years. The area of expertise in respect of which the certification was granted is the resolution of disputes regarding illegal content published on content sharing and social media platforms.

IDR is certified to issue decisions and conduct communications in English and to accept disputes where any underlying content or the communications of the online platform are in English. IDR intends to assess the disputes it receives by reference to Irish legal standards. It will issue decisions in accordance with Irish law.

In the application, IDR did not specify individual platforms which it intends to “onboard” to its ODS body process. In accordance with the requirements of the ODS body certification process, IDR identified the general category of online platforms with which it will engage in its capacity as an ODS body.

Assessment of application

The application submitted by IDR was assessed to determine whether the Applicant met the conditions to be certified as an ODS body. The assessment was conducted in accordance with the guidelines set out in An Coimisiún’s “*Article 21 Out-of-Court Dispute Settlement Guidance Document*” (the “Guide”) and was underpinned by a robust internal assessment framework developed to support the review of applications. The Guide can be accessed [here](#). The Guide is informed by Irish and European legislation, consultation, data-gathering and independent research. The Guide informs interested bodies of An Coimisiún’s assessment and decision-making process undertaken to determine whether the applicant meets the certification conditions. Together, the Guide and the assessment framework support evidence-based, transparent, consistent, and proportionate decision-making by An Coimisiún in the exercise of its statutory functions regarding Article 21. Confidential and commercially sensitive information was received as part of the Application and managed in accordance with the requirements of the Guide and An Coimisiún’s statutory obligations. As part of its assessment of the cost effectiveness of the proposed process, An Coimisiún commissioned an external review of the proposed fees, relative to IDR’s costs.

The following sections provide an outline of the key aspects of the application and the information that An Coimisiún focused on during the assessment process to arrive at its decision to certify IDR as an ODS Body.

Impartiality and Independence

This condition requires an applicant to demonstrate that it is sufficiently impartial and independent, including financially independent, of providers of online platforms and of online platform users. The Guide interprets this condition by reference to organisational independence, financial independence and the independence of the specific individuals within the proposed ODS body charged with resolving disputes.

In respect of organisational independence, the assessment focused on company ownership, and operational management. Based on the information submitted, An Coimisiún was satisfied that company ownership is sufficiently independent and IDR has put in place relevant measures, including the implementation of a Code

of Conduct, to protect organisational independence, impartiality and to avoid potential conflicts of interest on the part of its management and staff.

In respect of financial independence, the assessment focused on estimated set-up and core funding costs and the funding model. The estimated income and expenditure, and the underpinning assumptions, were considered to be reasonable. Based on the analysis conducted in respect of estimated income and expenditure, An Coimisiún was satisfied that the Applicant has sufficient seed funding and would become financially independent in the indicated time period. The service will be provided for free to users. The proposed fees for online platforms were explained, and appropriate justification was provided to demonstrate that those fees did not exceed the estimated costs to be incurred by IDR. IDR is required to notify An Coimisiún of any changes in fees. An Coimisiún will monitor any such changes to ensure that the fees remain appropriate and reflective of the costs incurred to discharge the ODS process.

In respect of independence of individuals charged with resolving disputes (“case decision maker(s)”), the assessment focused on recruitment, provisions in the employment contracts (e.g., remuneration, termination of contract), decision-making process followed by case decision makers, potential conflict of interest and reporting lines.

Based on the information submitted, An Coimisiún was satisfied that there are sufficient procedures in place to safeguard the independence of case decision makers. Case decision makers will consist of qualified arbitrators, recruited to a panel by IDR and appointed to each case by the Chartered Institute of Arbitrators. The case decision makers and case administrators will be bound by contracts and the Code of Conduct which set out expectations with regard to independence, absence of conflict of interest and bias.

Expertise

This condition requires that the ODS has the necessary expertise in relation to the issues arising in one or more particular areas of illegal content, or in relation to the application and enforcement of terms and conditions of one or more types of online platforms.

To determine whether the Applicant met the requirements of this condition, the assessment focused on the prior institutional knowledge that IDR had in providing dispute settlement services and the expertise, qualification or certification requirements set for senior managers and director-equivalent roles, overseeing the ODS process, and case decision makers’ expertise, qualifications, certifications and training related to the specified areas of expertise.

Based on the information provided, An Coimisiún considered that the knowledge and expertise of IDR’s senior management in alternative dispute resolution, media law and regulation were suitable and relevant. The expertise expectations set for the case decision makers (arbitrators), which included relevant legal expertise and specialised knowledge (including legal standards, online content moderation and the DSA) were regarded to be appropriate. IDR confirmed its intention for all case decision makers to be qualified arbitrators with a minimum of 7 years post-qualification experience. Both case decision makers and case administrators will also undergo internal training, covering topics such as the DSA, EU human rights frameworks and relevant Irish legislation.

Remuneration

This condition requires that the members of an ODS body are remunerated in a way that is not linked to the outcome of the procedure.



The assessment focused on IDR's remuneration policy, employment contract and remuneration conditions, such as salary.

Based on the information provided, An Coimisiún was satisfied that the remuneration is not contingent on the outcome of the disputes. There were no conditions in the employment contract, or otherwise, to suggest that the outcome of those disputes was linked to financial incentives or penalties.

Accessibility of the ODS process

This condition requires the ODS body to offer an ODS process that is easily accessible, through electronic communications technology.

The assessment focused on the process and functionality to ensure the dispute settlement procedure is easily accessible and transparent, the proposed electronic communications technology used to initiate the dispute settlement and the online interface with the user of the ODS process.

Having reviewed the information submitted, An Coimisiún considered that IDR's proposed procedures and technical solution are easily accessible and transparent, allowing the service recipient to submit all the requisite information and engage with the ODS body as necessary up to the case completion. A case management system will be used to log and track disputes. Case administrators will be assigned to each case to provide support and facilitate communications.

Swift, efficient and cost-effective ODS process

This condition requires that the ODS body demonstrates its capability to settle disputes in a swift, efficient and cost-effective manner and in at least one of the official languages of the institutions of the EU.

The assessment regarding this condition focused on:

- the dispute settlement procedure,
- approach to case selection and triaging,
- case management and escalation,
- dispute volume projections and turnaround time,
- fee model, and
- language in which the Applicant is capable of settling disputes.

In respect of the projected number of disputes, the metrics used by the Applicant to estimate the number of disputes, such as the DSA Transparency Reports and the available data shared by the existing certified ODS bodies, were considered to be adequate and reliable. The Applicant submitted sufficient information to demonstrate its ability to handle the estimated number of disputes, including staffing numbers, detailed dispute settlement procedure and additional operational measures.

Regarding the dispute settlement procedure, An Coimisiún was satisfied that the architecture of the dispute settlement procedure, together with the technological solution to be used by online platform users, were sufficient to ensure a swift and efficient ODS process. The Applicant's description of the process flow of the dispute settlement procedure from the point of submission to the point of issuance of decisions to both parties appeared to be sufficiently streamlined and clear. IDR's proposal to resolve illegal content disputes by reference to Irish legal standards was considered appropriate in light of the fact that both parties to a dispute

(platform and user) will be given an option to withdraw if the dispute originates from a different EU jurisdiction, and relevant evidence is provided. IDR's proposal to introduce a monthly volume cap to match its actual capacity and enable it to provide quality service and decisions was regarded as reasonable.

In respect of the cost-efficiency of the fees proposed by IDR, An Coimisiún considered that the fee model was sufficiently transparent and clearly explained. The cost-effectiveness analysis conducted indicated that the fees charged to online platforms were clearly linked to the costs incurred to process disputes and did not exceed those costs. The fee schedule proposed by IDR, listing common case outcomes and associated costs, was considered reasonable and comparable to the fees set by other ODS bodies. An Coimisiún was satisfied that IDR would provide the necessary transparency to online platforms in respect of the fees charged. There will be no fees charged to online users.

In relation to the languages, IDR provided sufficient information to demonstrate that it can settle disputes in English. Its case administrators and case decision makers will be native English speakers.

Fair and clear rules of procedure

This condition requires the Applicant to carry out the ODS process according to clear and fair rules of procedure, and that those rules are easily and publicly accessible, and compliant with applicable laws.

In respect of the fair and clear rules of procedure, the assessment focused on:

- the aspects of procedure covered in the Rules of Procedure document, including the good faith obligations for platforms and service recipients and the obligation for the ODS body to issue a reasoned decision;
- the normative decision-making framework (standards and norms governing ODS body's decision-making on disputes), which should adhere to fundamental rights standards.

The Rules of Procedure provided by IDR as part of its Application follow the requirements outlined in the Guide for this condition, covering rules of engagement, dispute admissibility requirements, dispute process, conditions for case decision maker appointment, potential outcomes of disputes, time estimates, independence and impartiality, and user's legal rights. IDR has confirmed its intention to publish its Rules of Procedure on the IDR website once the ODS body is fully operational in August 2026.

Based on the information submitted, An Coimisiún was satisfied that the normative framework which will be utilised by IDR is designed to take fundamental rights standards into consideration.

