

An aerial photograph of Zurich, Switzerland, showing the city's layout with the Limmat river, various buildings, and green spaces. The ETH Zurich campus is prominently featured in the center-right, with its large domed building and surrounding structures. A yellow construction crane is visible in the lower right area of the image.

Moderating Digital Platforms

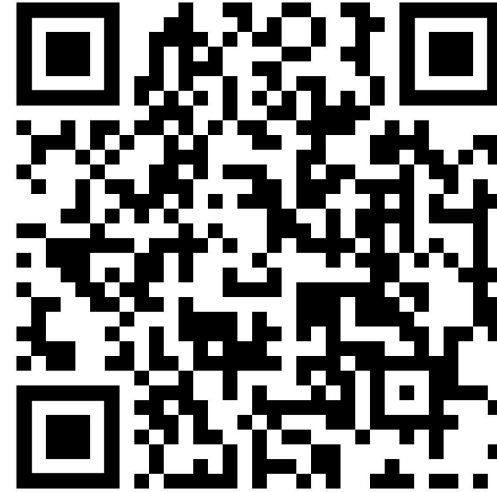
Week 5: Brief Introduction to the DSA

Raquel De Haro & Luka Nenadic

14/10/2025, Zurich

Agenda

1. Admin
2. Introduction to the DSA and ODS Bodies
3. Presentation by Niklas Eder
4. Group Work (if time permits)



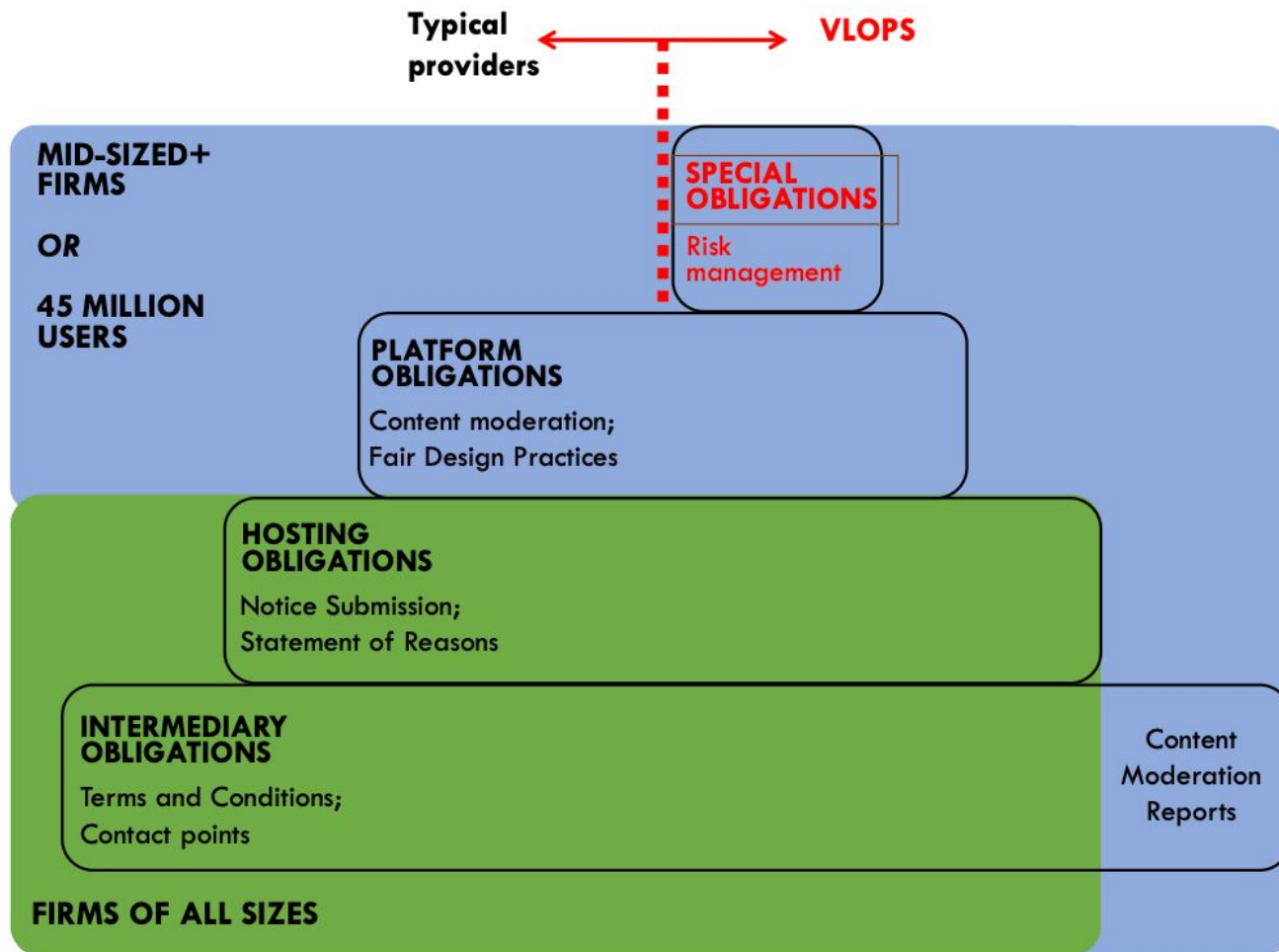
GitHub Repository

Admin

- *Extended deadlines* for group creation and preliminary task:
 - **By 17.10.25:** Create your *groups of 3-4 people* & fill in your names [here](#).
 - **By 31.10.25:** Upload a brief outline (max. 1 page) explaining your chosen platform (What type of platform is it? Who is it intended for? What are its main features?) and the general policy direction you plan to implement (e.g. 'No Adult Content Allowed').

Introduction to the Digital Services Act (DSA):

- Effective August 25, 2023, for VLOPs and VLOSEs.
- Effective for all online platforms on February 17, 2024.
- Extraterritorial effect: applicable to all online intermediaries providing services in the single market (EU).
- Imposes **specific transparency and content moderation obligations** upon VLOPs and VLOSEs (>45m monthly users in EU) based on identified 'systemic risks'.
- Sanctions of up to 6% of the annual global turnover in the previous year.
 - In case of repeated infringements = potential temporary restriction to the service.





Porn hub

XVIDEOS

XNXX.COM



STRIPCHAT



SHEIN



facebook



zalando

Google



Google Play

Google



Google Search

I'm Feeling Lucky



WIKIPEDIA



amazon

‘Systemic Risks Under the DSA’:

Article 34

Risk assessment

1. Providers of very large online platforms and of very large online search engines shall diligently identify, analyse and assess any systemic risks in the Union stemming from the design or functioning of their service and its related systems, including algorithmic systems, or from the use made of their services.

They shall carry out the risk assessments by the date of application referred to in Article 33(6), second subparagraph, and at least once every year thereafter, and in any event prior to deploying functionalities that are likely to have a critical impact on the risks identified pursuant to this Article. This risk assessment shall be specific to their services and proportionate to the systemic risks, taking into consideration their severity and probability, and shall include the following systemic risks:

- (a) the dissemination of illegal content through their services;
- (b) any actual or foreseeable negative effects for the exercise of fundamental rights, in particular the fundamental rights to human dignity enshrined in Article 1 of the Charter, to respect for private and family life enshrined in Article 7 of the Charter, to the protection of personal data enshrined in Article 8 of the Charter, to freedom of expression and information, including the freedom and pluralism of the media, enshrined in Article 11 of the Charter, to non-discrimination enshrined in Article 21 of the Charter, to respect for the rights of the child enshrined in Article 24 of the Charter and to a high-level of consumer protection enshrined in Article 38 of the Charter;
- (c) any actual or foreseeable negative effects on civic discourse and electoral processes, and public security;
- (d) any actual or foreseeable negative effects in relation to gender-based violence, the protection of public health and minors and serious negative consequences to the person’s physical and mental well-being.

Main obligations for ALL providers under the DSA:

- Have an electronic point of contact in the EU (not solely rely on automated tools).
- Legal representatives in the EU.
- Terms and Conditions shall include any restrictions on their services: clear, plain, intelligible, user-friendly and unambiguous language.
- Transparency Reports → once a year (every 6 months for VLOPS/VLOSES).

Additional obligations for providers of HOSTING services:

! Remember: all online platforms are hosting services, but not all hosting services are online platforms.

- **Notice & Action mechanisms** → allow any individual or entity to notify any illegal content.
- **Statement of Reasons** → clear and specific explanation for any restrictions imposed to recipients because their content is deemed illegal or violates the platform's T&C.
- **Inform authorities** in case of suspicious criminal offences involving a threat to the life or safety of a person.

Additional obligations for online platforms (micro & small enterprises excluded):

- Have an **internal complaint-handling system** (electronic & free of charge).
 - [Out-of-court Dispute Settlement](#) (Art. 21) → see Niklas Eder's talk.
 - [Trusted Flaggers](#) → their notices are given priority.
 - **Protection measures against misuse** → i.e. suspending recipients that recurrently provide illegal content.
 - **Transparency Reporting** → publish their AMAR (average monthly active recipients) every 6 months.
 - Publish their Statement of Reasons to the [DSA Transparency Database](#).
 - **Not use deceptive or manipulative designs.**
 - Clear information re. **advertisements** & NO profiling using special categories of personal data.
 - **Transparency of recommender systems** → explain main parameters & options to modify them in T&C.
 - **Online protection of minors** → NO profiling of minors.
- + Other obligations for distant contracts with traders.

Statements of Reasons: Advanced Search

With the form below you can now specify many more filters on the statements of reasons. To submit feedback on the content of this page and to propose additional features, please visit the [link](#) to the feedback form.

Search and Filtering

Platform

Ground for Decision

Visibility restriction of specific items of information provided by the recipient of the service

Monetary payments suspension, termination or other restriction

Monetary payments suspension, termination or other restriction

Monetary payments suspension, termination or other restriction

Type of Account

Category

Statement of reason details: e44e27ae-ec15-4027-b2af-e3d482e94eff

Platform name	Google Shopping
Received	2024-05-26 23:59:24 UTC
Visibility restriction of specific items of information provided by the recipient of the service	Disabling access to content
Facts and circumstances relied on in taking the decision	When reviewing content or accounts to determine whether they are illegal or violate our policies, we take various information into consideration when making a decision, including product data, website quality, merchant information, account information (e.g., past history of policy violations), and other information provided through reporting mechanisms (where applicable) and own-initiative reviews.
Ground for Decision	Content incompatible with terms and conditions
Reference to contractual ground	Restricted adult content
Explanation of why the content is considered as incompatible on that ground	Google identified that some of your products contain adult-oriented content
Is the content considered as illegal?	No
Territorial scope of the decision	European Economic Area
Content Type	Product

Additional obligations for VLOPS & VLOSES to manage systemic risks:

- Conduct risk assessments every year (including the risks from the design and functioning of their systems, including algorithms).
- Mitigation measures of the risks identified (i.e., adapting T&C, improving interfaces, etc.).
- Crisis response mechanism (after a decision of the Commission).
- Conduct yearly independent audits.
- Recommender systems → provide, at least, one option not based on profiling.
- **Online advertisement transparency database.**
- Data Access → ‘vetted researchers’ & access to publicly available information.
- Compliance Officer
- Transparency Reports every 6 months.

In preparation

Call for evidence

Feedback period

16 September 2025 - 14 October 2025

Feedback: Open

Upcoming

Commission adoption

Planned for

Fourth quarter 2025

Feedback: Upcoming

About this initiative

Summary

The digital package will set out the Commission’s simplification agenda for the years to come. Based on feedback from 3 public consultations, it will include a digital omnibus with a first set of measures to quickly reduce the burden on businesses.

These measures focus on:

- data legislation, including rules on cookies and other tracking technologies
- cybersecurity incident reporting
- targeted adjustments to the Artificial Intelligence Act to ensure the optimal application of the rules.

Topic

Digital economy and society

Type of act

Proposal for a regulation

Category

Commission Work Programme, REFIT

Call for evidence