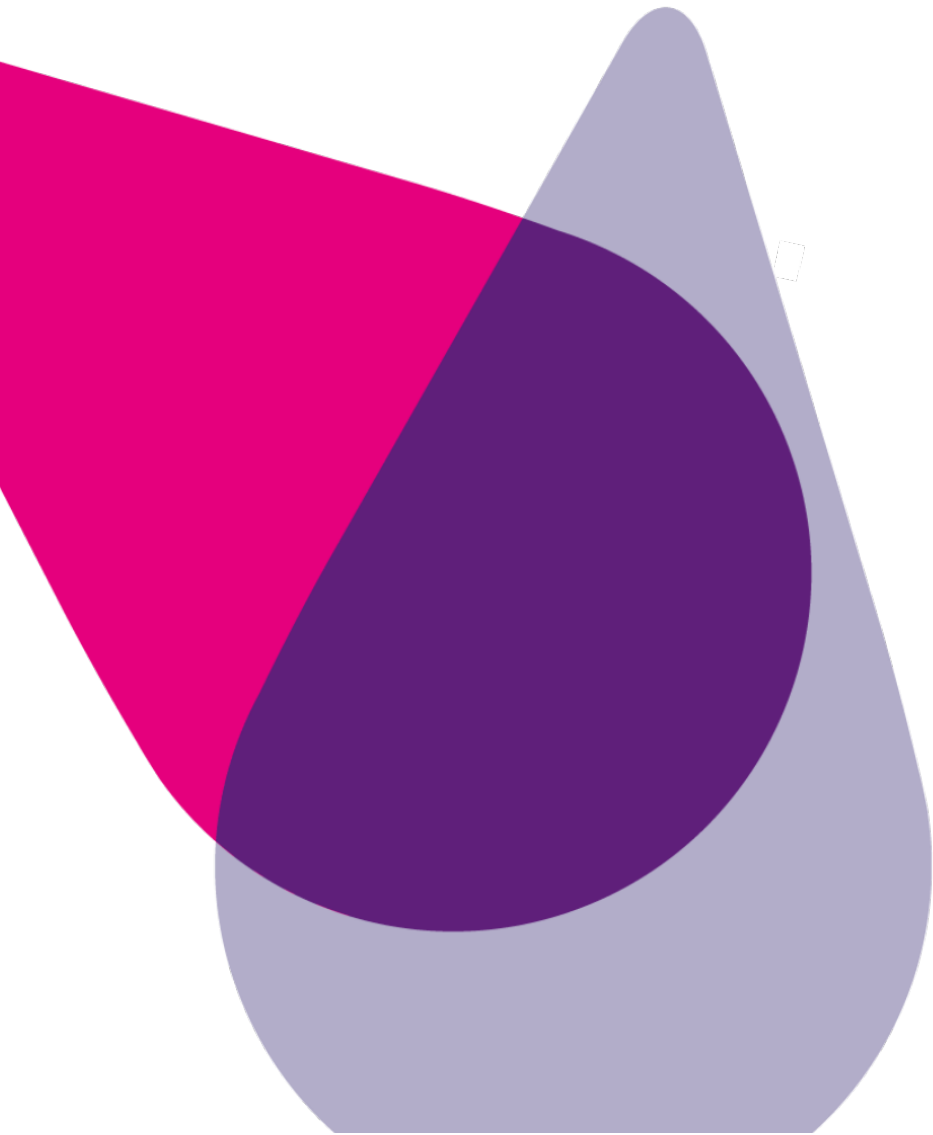


Authority for
Consumers & Markets



Digital Services Act

Annual activity report 2025



**Annual activity report of the Netherlands
Authority for Consumers and Markets (ACM)
pursuant to Article 55 of the Digital Service
Act (DSA)**

01 January 2025 – 31 December 2025

Executive summary

The DSA in practice: making the internet safer

Since February 2025, the Netherlands Authority for Consumers and Markets (ACM) has been fully authorized to enforce the Digital Services Act (DSA). This groundbreaking European regulation establishes the responsibilities for online platforms, hosting services, and search engines, and serves as the basis for a safe and trusted online environment. ACM is additionally the Digital Services Coordinator (DSC) for the Netherlands.

In 2025, the first concrete steps were taken towards a safe online environment. In those efforts, ACM focused on the protection of minors, taking action against webhosting services, and contributing to a trusted online environment, particularly during election campaigns.

In 2025, ACM launched an investigation into the sale of illegal products on Snapchat. This investigation has now become part of a wider investigation, in which ACM and the European Commission are working together. In addition, ACM launched a preliminary investigation into gaming platform Roblox.

Also in 2025, ACM ran public awareness campaigns to familiarize users with their online rights and options under the DSA. In addition, ACM actively held discussions with online platforms, researchers, and trusted flaggers. These actions have had an effect: the number of reports went up to 727 reports. Also, ACM launched the 'DSA check', an online tool that helps website and app owners easily determine whether, and if so which, DSA rules apply to them.

In the run-up to the Dutch general election in November 2025, ACM played an active role in strengthening a trusted digital environment. ACM actively informed Dutch MPs and MP candidates about the options for filing reports. Discussions were also held with various non-profit organizations and researchers.

Cooperation is the key to effective oversight. The creation of the DSA Chamber, which is part of the Digital Regulation Cooperation Platform, a collaboration between 12 national regulators sharing knowledge, but also the granting of the status of trusted flaggers to four organizations show how the DSA ecosystem is growing.

After an impactful first year of enforcing the DSA, ACM will work on the following in 2026:

Education

In the run-up to the Dutch municipal elections in March 2026, ACM actively informs sitting councillors and councillor candidates about the options for filing reports about harmful or illegal content. ACM will launch a second public awareness campaign aimed at minors.

Active oversight

The joint investigation with the European Commission into Snapchat will be continued and expanded. Following the preliminary investigation in 2025, ACM launches a further investigation into online gaming platform Roblox. Also, ACM expects to handle multiple requests for enforcement.

Coordination and cooperation

ACM further expands its role as active coordinator by working closely together with other regulators in the DSA Chamber. The same goes for ACM's participation in the European Board for Digital Services, for example, by co-chairing the Board's Working Group II.

Annual activity report of ACM pursuant to Article 55 of the DSA

01 January 2025 – 31 December 2025

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1. Introduction

1.1. General introduction of the DSA

The Digital Services Act (“DSA”) provides harmonized rules for a safe, predictable and trusted online environment when interacting with so-called ‘intermediary services’, which include e.g. online platforms, hosting services, or search engines. Examples of such harmonized rules are (1) additional transparency requirements on how online platforms moderate content, (2) citizens’ access to out-of-court dispute 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 Services Coordinators (“DSCs”), other national regulators designated as competent authorities in their Member States, and, for VLOPs and VLOSEs, by the European Commission. The Netherlands Authority for Consumers and Markets (ACM) is the Digital Service Coordinator for the Netherlands. The other competent authority to enforce the DSA is the Dutch Data Protection Authority (AP). Both organizations have been fully authorized to enforce the DSA since 4 February 2025.¹

1.2. Background information

Article 55 of the DSA requires every DSC to prepare and publish an annual report detailing its activities over the past year. The report must include information on complaints received under Article 53 of the DSA 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, in accordance with 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 for Digital Services.

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

In the Netherlands, the other competent authorities for enforcement of the DSA is the Dutch Data Protection Authority (AP). The AP is responsible for enforcement of

¹ [Bulletin of Acts and Decrees 2025, 21](#) (in Dutch)

Article 26, paragraph 3, Article 27, and Article 28, paragraph 2 of the DSA. This report incorporates all relevant information and data as provided by these other competent authorities, ensuring full compliance with the obligations of Article 55, paragraph 3 of the DSA. Chapter 2 contains information on complaints, and chapter 3 on orders. Chapter 4 sets out information on out-of-court dispute settlement bodies, chapter 5 on trusted flaggers, and chapter 6 on vetted researchers. Chapter 7 gives information on enforcement and activities (national and international). Chapter 8 contains the conclusions.

2. Complaints (Article 53 of the DSA)

2.1. Introduction

Article 53 of the DSA establishes the right of recipients of intermediary services, or any mandated organization or association acting on their behalf, to lodge a complaint against providers of such 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.

Already in 2024, ACM created and trained a dedicated complaint-handling team for this task.

2.2. Complaints in 2025

In 2025, ACM received a total of 727 complaints about possible violations of the DSA. This is a significant increase compared to the total of 256 complaints received in 2024.² The AP received a total of 33 complaints, all of which were forwarded to ACM. 316 of the 727 complaints were forwarded by ACM to the DSC in the Member State where the provider of the intermediary service is established.

For the 411 remaining complaints, the information received in these complaints has been carefully incorporated into ongoing investigations, various internal analyses, and further prioritization of oversight activities, ensuring meaningful contributions to well-informed decision-making, and the continuous refinement of oversight processes.

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

3.1. 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

² <https://www.acm.nl/nl/publicaties/acm-dsa-jaarverslag-2024>

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 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. Similarly to Article 9 of the DSA, Article 10 of the 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.

Together with other DSCs and relevant Dutch authorities, ACM is working towards a fully functional system for the receipt and further transfer of the orders pursuant to article 9, paragraph 3 and 4 and article 10, paragraph 3 and 4 of the DSA. In that context, ACM has received zero orders pursuant to Article 9 and zero orders pursuant to Article 10 of the DSA in 2025. ACM will continue working on a fully functional system in 2026.

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

4.1. 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 disputes and are also required to cooperate with the procedures of certified out-of-court dispute settlement bodies. Upon request, DSCs certify out-of-court 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 out-of-court dispute settlement bodies must be independent. In addition, they must have sufficient expertise, for example, in a certain type of illegal content. The out-of-court dispute settlement bodies must handle disputes in at least one official EU language.

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

In 2025, ACM certified zero out-of-court dispute settlement bodies because ACM did not receive any such requests.

5. Trusted flaggers (Article 22 of the DSA)

5.1. 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. The DSCs oversee the application process, ensuring the 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 the DSCs in the application of these criteria. The Commission is preparing such guidelines that will assist DSCs by streamlining the process of appointing trusted flaggers. The guidelines will also provide guidance on how online platforms should handle trusted flaggers that misuse their status and how their status can be revoked by DSCs. The "Have your say" public consultation is planned to be launched in the second quarter of 2026, with adoption planned before the end of 2026.³

5.2. Trusted Flaggers in 2025

In 2025, ACM received six applications to grant organizations the status of trusted flagger. One of these applications was withdrawn, and one of these applications was pending on the 31st of December 2025. There have been no rejections of any applications.

In 2025, ACM granted the organizations Stichting Brein, Meld Online Discriminatie (MOD), Stichting React and Offlimits the status of trusted flaggers. ACM considers that these organizations possess specific expertise and competence in identifying and reporting illegal content, are independent of online platform providers, and carry out their activities with the aim of making reports diligently, accurately, and objectively.

6. Vetted researchers (Article 40 of the DSA)

6.1. 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 Engine 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.

³ <https://digital-strategy.ec.europa.eu/en/policies/trusted-flaggers-under-dsa>

6.2. Status granted to vetted researchers in 2025

As a result of the entry into force of the Delegated Act provided for in Article 40(13) of the DSA on 29 October 2025, ACM has not (or not yet) granted anyone the status of vetted researcher.

7. Enforcement, national and international activities

7.1. Introduction

In 2025, 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.

7.2. Enforcement activities and investigation powers used in 2025

2025 was the first year in which ACM was fully designated as the DSC of the Netherlands. In that context, ACM opened its first formal investigations in the Netherlands.

Protecting minors is the subject of several investigations. In 2025, ACM launched an investigation into the online platform Snapchat in connection with the sale of vaping products to minors on the platform. The possible violation concerned Snapchat's policy regarding the protection of minors. In 2025, ACM also sent a request for information to online game platform Roblox, as part of a preliminary investigation into that platform's measures regarding the protection of minors. Consequently, a formal investigation into Roblox was announced (although only in 2026). ACM also focused on webhosting services in the fight against illegal online content. Webhosting services play a central role in the dissemination of information on the internet. The Netherlands has a large hosting sector, and ACM wants to include its role of DSC in its strategy for combating bad hosting practices. In 2025, ACM worked together with several other relevant national authorities on this topic. In 2026, ACM will continue its investigation into the compliance of web-hosting services with the DSA, e.g. whether hosting services respond quickly and effectively to reports of illegal content.

7.3. National activities in 2025

ACM carried out a range of activities regarding the DSA, which had, as their main focus, creating public awareness regarding the DSA, creating a partnership with other relevant authorities, and combating disinformation during national elections.

7.3.1. Creating public awareness

In 2025, ACM continued its efforts to raise awareness on the rights and obligations in the DSA. One of these initiatives was a public campaign on social media focusing on three key issues: illegal content, account restriction, and the lack of transparency

in paid advertising. ACM also launched the DSA check on its website.⁴ This online tool helps owners of websites and apps easily determine whether and, if so, which DSA rules apply to them.

7.3.2. Partnership between digital regulators

ACM works closely with other Dutch regulators in the context of digital regulation, and is part of the Digital Regulation Cooperation Platform (in Dutch: Samenwerkingsplatform Digitale Toezichthouder, or SDT). In the context of ACM's role as Digital Services Coordinator under the DSA, ACM initiated the 'DSA Chamber' (in Dutch: DSA Kamer) as part of the SDT in 2024. The DSA Chamber is a collaboration between 12 regulators within the context of the Digital Services Act (DSA). The purpose of the DSA Chamber is to share knowledge and experience of DSA oversight and enforcement. Cooperation is necessary for ensuring that oversight of the digital sector is effective and efficient. ACM, as the Digital Services Coordinator (DSC), chaired the four meetings that were held in 2025.⁵

7.3.3. ACM as Digital Services Coordinator during election campaigns

During the campaign for the Dutch general election in 2025, ACM fulfilled its role as Digital Service Coordinator in the Netherlands. ACM informed online platforms about their obligations regarding the DSA, and organized a meeting with several platforms, regulators, the European Commission, and civil-society organizations to discuss the application of the DSA during the campaign.⁶

7.4. International activities

7.4.1. 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 oversight tasks. They provide each other with insights and expertise, consult external experts when necessary, and contribute to the analysis of

⁴ <https://www.acm.nl/nl/digitale-economie/online-diensten-aanbieden/dsa-check>

⁵ <https://www.acm.nl/nl/over-de-acm/organisatie/samenwerkingen/nationale-samenwerking>

⁶ <https://www.acm.nl/nl/publicaties/acm-wijst-online-platforms-op-hun-verantwoordelijkheid-verkiezingstijd>

emerging issues related to digital services within the internal market. Therefore, participation in the Board requires an active role in collaboration, as well as working together to ensure DSA compliance, with attention to the specific context of each Member State.

In 2025, the European Board for Digital Services held a total of 6 meetings and 3 ad-hoc meetings.⁷ 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.

ACM attended all Board meetings. In addition, ACM experts participated in all eight Working Groups that have been established under the Board, including working group 1- Horizontal and legal issues, working group 2- Working together, working group 3 – Content moderation and data access, working group 4 – Integrity of the information space, working group 5- Consumers and online marketplaces, working group 6 – Protection of minors, working group 7- Orders and criminal issues, and working group 8 – It issues. Additionally, ACM was elected as Vice-Chair of working group 2. As Vice-Chair, ACM assisted the Chair of Working Group 2.⁸

8. Conclusions

In its oversight efforts, ACM wishes to ensure a safe and reliable online environment. The DSA provides harmonized rules for safe, predictable, and trusted online environments when interacting with so-called ‘intermediary services’, which include e.g. online platforms, hosting services, or search engines. The DSA is an important instrument for establishing the responsibilities of providers of intermediary services. The DSA has been fully in effect since 17 February 2024. Since 4 February 2025, ACM as well as the Dutch Data Protection Authority (AP) have been fully authorized as competent authority to enforce the DSA. In that context, both ACM and AP received a total of 727 complaints. Moreover, ACM carried out a range of activities regarding the DSA, mainly focusing on the protection of minors, creating public awareness of the DSA, and creating a partnership with other relevant authorities.

In 2026, ACM, together with other Dutch and European regulators, will continue its investigations into the measures that certain platforms take to protect the minors who use their services. ACM will also continue its assessment of the extent to which webhosting companies take their responsibility for contributing to a safe online environment by responding quickly and effectively to reports of illegal content.⁹

⁷ <https://digital-strategy.ec.europa.eu/en/policies/dsa-board>

⁸ <https://digital-strategy.ec.europa.eu/en/policies/dsa-board-working-groups>

⁹ <https://www.acm.nl/en/publications/focus-digital-economy-2026>