



AUTORITÉ DE LA
CONCURRENCE
GRAND-DUCHÉ DE LUXEMBOURG

ONLINE PLATFORMS

ANNUAL REPORT 2024

IV. ONLINE PLATFORMS

In 2024, the Authority once again saw its remit in the area of online platform regulation expand with its designation as Digital Services Coordinator.

Since 2021, the Authority has been responsible for ensuring compliance with Regulation (EU) 2019/1150 on relations between platforms and businesses ([Platform to Business - P2B](#))¹⁴. In this context, it defends the collective interests of business users of online platforms and search engines.

Since 2023, the Authority has been assisting the European Commission, where necessary, in ensuring compliance by digital market gatekeepers with Regulation (EU) 2022/1925 on digital markets ([Digital Markets Act - DMA](#))¹⁵.

The Authority has also devoted a large part of its 2023 and 2024 activity to reorganising itself to ensure the regulation of platforms for a safe online environment following the entry into force of Regulation (EU) 2022/2065 on digital services ([Digital Services Act - DSA](#)). In this context, it assumes the role of Digital Services Coordinator for Luxembourg.

As regards digital markets regulation, the Authority therefore supervises, coordinates and protects a large number of players, namely:



approximately 240 Luxembourg platforms concerned by the DSA¹⁶



business users of online platforms (P2B)



professionals and consumers vis-à-vis GAFAM (DMA)



Internet users and minors with regard to illegal content on the Internet (DSA)

ONLINE PLATFORMS DEPARTMENT

In order to carry out its new tasks in an efficient and coordinated manner, in particular with regard to the implementation of the DSA, the Authority continued to reorganise its teams to create a fully-fledged 'Digital Markets' department, renamed the 'Online Platforms' service at the end of 2024.

As at 31 December, the service consisted of a legal advisor responsible for the department, a lawyer specifically assigned to the DSA, and a digital analyst with a background in economics.

¹⁴ Law of 5 March 2021 on certain arrangements for implementing Regulation (EU) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services
<https://legilux.public.lu/eli/etat/leg/loi/2021/03/05/a185/consolide/20230101>

¹⁵ Law of 29 March 2023 for the implementation of the Digital Markets Act
<https://legilux.public.lu/eli/etat/leg/loi/2023/03/29/a181/loi>

¹⁶ Estimate of the Ministry of Economy (11 September 2023)
https://meco.gouvernement.lu/en/actualites/gouvernement%2Bfr%2Bactualites%2Btoutes_actualites%2Bcommuniqu%C3%A9s%2B2023%2B09-septembre%2B11-fayot-paquet-ue-espace-numerique.html

PLATFORM TO BUSINESS (P2B)

Providers of online platforms or search engines must comply with the obligations of the P2B Regulation vis-à-vis EU businesses using these platforms to sell their goods or services to EU consumers.

This Regulation aims to [create a fair, transparent and predictable business environment for companies using online platforms](#). Platforms play a crucial role for millions of businesses. Their position as intermediaries between businesses and consumers nevertheless entails a risk of harmful commercial practices, against which businesses do not always have recourse.

Providers of online platforms or search engines must therefore comply with certain obligations regarding their terms and conditions and commercial practices.

Businesses or users of business websites who consider that they have been harmed by a practice prohibited by law may bring an action for an injunction before the Authority.

DIGITAL MARKETS ACT (DMA)

Since 6 March, major internet platforms have been required to comply with the provisions of the Digital Markets Act (DMA).

The aim of this regulation is to [rebalance the relationship between large digital platforms and business users](#) in order to foster the development of small platforms and stimulate competition for the benefit of consumers.

The DMA thus establishes harmonised rules to prevent unfair behaviour by large online platforms acting as "gatekeepers" to digital markets. In addition to the competition rules that allow for ex post sanctions for abuse of dominant positions, the DMA sets out certain ex ante obligations that large digital platforms must comply with in order to ensure fair competition.

The European Commission is the only authority empowered to enforce the rules of the DMA and has extensive powers to investigate, monitor and enforce the rules set out in the DMA.

However, the Authority and other national competition authorities cooperate with the European Commission in a coordinated approach.

DIGITAL MARKETS ADVISORY COMMITTEE

Established on 13 January 2023, the [Digital Markets Advisory Committee](#) assists the Commission in the application of the [Digital Markets Act \(DMA\)](#).

Each Member State is represented by a delegation of experts from the competent national authorities.

In 2024, the Authority participated in the [5th meeting of the Committee on 1 February](#), the [6th meeting of the Committee on 20 March](#) and the 4-October meeting.

EXCHANGE PROGRAMME OF THE EUROPEAN COMPETITION NETWORK

As part of the European Competition Network (ECN) exchange programme, Philipp Noppeney, a lawyer in the Authority's Competition Department, spent three months within the European Commission's Directorate-General for Competition (DG COMP).

He was assigned to the unit responsible for implementing the Digital Markets Act (DMA). This exchange coincided with the date on which the obligations imposed by the DMA became applicable to the main undertakings designated as gatekeepers.

DIGITAL SERVICES ACT (DSA)

Applicable to certain digital players since 25 August 2023, the DSA has been fully in force since 17 February 2024.

It aims to [combat the dissemination of illegal or harmful content online](#). Hate speech, content of sexual abuse of minors, sale of counterfeit goods: what is illegal offline must also be illegal online.

Intermediary service providers (network infrastructure, hosting, online platforms or search engines, etc.) must therefore comply with obligations corresponding to their role, size and impact in the digital ecosystem.

In 2024, with the bill determining the modalities of implementation of the DSA still pending in the Chamber of Deputies, the Authority did not yet have the necessary powers to investigate, monitor and enforce the rules set out in the DSA.

However, it was already acting as Digital Services Coordinator in Luxembourg. A platform user who considered that there had been an infringement of the DSA Regulation could therefore already lodge a complaint with the Competition Authority.

The European Commission is responsible for ensuring compliance with the DSA by very large online platforms and very large online search engines.

IMPLEMENTATION OF THE DSA

The DSC's role

As the Digital Services Coordinator (DSC) for Luxembourg, the Authority oversees platforms for a safe online environment in line with the DSA.

It also receives and handles complaints from users of online platforms.

Online complaint handling tool

On 15 October, the Authority, together with the *Centre des technologies de l'information de l'État (CTIE)*, launched a new assistant on *MyGuichet.lu*.

This tool allows users of online platforms who believe that there has been a breach of the DSA to lodge a [complaint for non-compliance with the DSA](#).



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Statistics

Complaints

Total number of complaints received	17
Total number of complaints sent to other DSCs	3 (DSC IE)
Total number of complaints received from other DSCs	5 (1 DSC DE, 3 DSC NL, 1 DSC SE)

In 2024, the Competition Authority received 17 complaints for alleged breaches of the DSA.

12 of them were sent through the complaint form set up by the Authority, while 5 of them were transferred to the Authority by other European Digital Services Coordinators (DSCs).

Those five complaints came from the Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen (DSC DE, 1 complaint), the Autoriteit Consument en Markt (DSC NL, 3 complaints) and the Post-och telestyrelsen (DSC SE, 1 complaint).

In addition, pursuant to Article 53 of the DSA, the Authority forwarded 3 complaints to the Coimisiún na Meán (DSC IE, 3 complaints).

Some complaints received did not fall within the Authority's remits under the DSA. The behaviours reported by the complaints concerned the following areas:

- ✓ Misleading and manipulative presentation of the service (dark patterns),
- ✓ Non-compliant content removal or user account blocking;
- ✓ Lack of point of contact for the intermediary service provider;

- ✓ Lack of or problems in the use of the mechanism for reporting illegal content put in place by the intermediary service provider.

As the law implementing the DSA was adopted on 2 April 2025, these complaints did not lead to the opening of an investigation in 2024.

Orders

Total number of orders received	0
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Article 9 of the DSA defines the obligations of intermediary service providers when they receive a decision from national judicial or administrative authorities requiring them to take action against illegal content.

Firstly, when a provider receives such an order, it must inform the issuing authority (or any other authority specified in the order) of any action taken in response to the order. The provider shall also specify whether and when the requested measures have been taken. The article also sets out the conditions under which national authorities may take such decisions.

The authority that issued the order, or any other specified authority, must communicate the order and any information relating to its implementation to the digital services coordinator of the Member State of the authority that issued the order. The DSC then communicates this information to all other digital services coordinators.

Article 10 of the DSA requires intermediary service providers to inform the competent national judicial or administrative authority, or any other authority specified in the injunction, without delay upon receiving an order requesting them to provide specific information about the individual recipients of their services, of the receipt of the order and of its effect.

The article also sets out the conditions applicable to orders issued by national authorities. Like Article 9 of the DSA, Article 10 of the DSA also sets out the conditions applicable to orders issued by national authorities. The authority that issued the order (or any other designated authority) must also communicate the order and any information relating to its execution to the digital services coordinator of the Member State of the authority that issued the order. The digital services coordinator shall then communicate this information to all other digital services coordinators.

In 2024, the Authority did not receive any orders.

Certifications

Trusted Flaggers

Under Article 22 of the DSA, trusted flaggers are empowered to detect potentially illegal content and alert online platforms. They are experts in detecting certain types of illegal content online, such as hate speech or terrorist content, and in notifying online platforms of such content.

The notifications they submit must be treated as a priority by online platforms, as they are expected to be more accurate than those submitted by ordinary users. The digital services coordinator of the Member State where the applicant entity is established grants the status of trusted flagger. The DSC shall supervise the application process and ensure that entities fulfil the conditions set out in Article 22 of the DSA.

In 2024, the Authority received an application from an organisation requesting the award of the trusted flagger status.

Vetted Researchers

Vetted researchers are researchers who have the right to access non-public data for their research on very large online platforms and very large search engines that contribute to the detection, identification and understanding of systemic risks or measures to mitigate them. Some examples of systemic risks include the dissemination of illegal content, negative effects on the exercise of fundamental rights, civic discourse, electoral discourse, gender-based violence, and the protection of health, minors or well-being.

In order to obtain access to relevant data, the digital services coordinator of the Member State of establishment of a very large online platform or a very large specific search engine may grant the status of authorised researcher where the researcher has demonstrated that they meet the conditions laid down in Article 40(8) of the DSA.

The DSCs are currently awaiting the publication of a delegated act on access to data by the European Commission, expected in 2025.

It clarifies the procedures leading to the sharing of data by very large online platforms and very large search engines with authorised researchers. It also specifies the conditions for providing such data and establishes a DSA data access portal that will serve as a one-stop shop for researchers, data providers and coordinators for digital services. Consequently, no approved researcher status was granted in 2024.

Out-of-court dispute settlement bodies

Out-of-court dispute settlement bodies offer users the possibility of resolving disputes relating to content moderation with online platforms.

Online platforms must inform users of the possibility of recourse to an out-of-court dispute settlement body when they communicate their decision on content moderation to them.

Under Article 21 of the DSA, after examining a request submitted by a body, the Digital Services Coordinator for the establishment may certify that body if it meets the requirements set out in Article 21.

The Authority did not certify any out-of-court dispute settlement bodies in 2024.

NATIONAL COORDINATION ACTIVITIES

As the digital services coordinator for Luxembourg, the Authority is responsible for coordinating cooperation between the competent national authorities. As illegal content is defined by Luxembourg national law, numerous national laws and competent authorities are involved in the DSA.

With this in view, the Authority organised two collective brainstorming workshops bringing together several Luxembourg national authorities with the aim of determining future cooperation between stakeholders in the context of the application of the DSA.

First workshop

On 7 March, the Authority organised a workshop about ‘How can authorities work together to ensure optimal protection of citizens?’ within the framework of the DSA.

In cooperation with stakeholders, the Authority spent the whole morning working towards establishing an efficient ecosystem in Luxembourg, enabling users of digital services to effectively enforce their rights.



Second workshop

On 28 March, the Authority organised a second workshop about the implementation of the DSA – what resources, tools and means? within the framework of the DSA.

In cooperation with stakeholders, the Authority focused on identifying the flows imposed by the DSA in order to map the relevant actors.

This analytical work will ultimately lead to an efficient referral of users of digital services to the competent authority.



EUROPEAN COOPERATION

Collaboration with other authorities

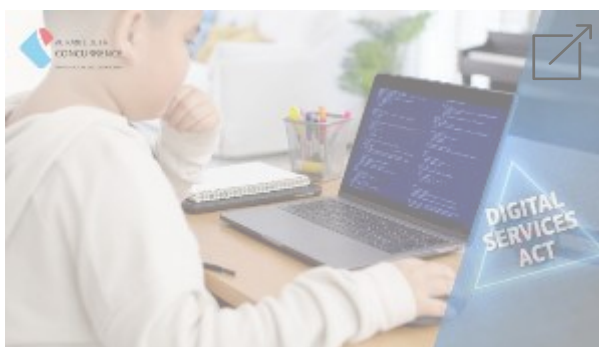
Beyond the mutual transmission of complaints, the Authority has collaborated with other digital services coordinators in several ways, such as responding to requests for information or bilateral exchanges with the competent authorities of other Member States on specific topics, such as trusted flaggers.

Monitoring and supporting the Commission's activities

In 2024, the Authority supported the activity of the European Commission in relation to the DSA by regularly sharing its communications on, inter alia, the designation of very large online platforms, the opening of formal procedures or public consultations under the DSA.

On 2 August, it thus shared, on its website and on its social networks, the call for contributions to [the Guidelines on the protection of minors online](#).

On 26 November, it also shared the consultation on [researchers' access to data from very large online platforms](#) to enable Luxembourg citizens to contribute to the efficiency of the DSA implementation work.



European Board for Digital Services

Provided for in Article 61 of the DSA, the European Board for Digital Services aims to contribute to a safe, predictable and reliable online environment that fosters innovation while ensuring the protection of fundamental rights.

Through the Board, the European Commission and the Digital Services Coordinators work together as a coherent team, taking a European approach to the implementation of the DSA.

The Board thus plays a key role in ensuring the consistent application of the DSA throughout the European Union, to the benefit of all European citizens, society and the economy. The Committee is the platform for discussion of all relevant issues and priorities concerning the application of the DSA. Close and trust-based cooperation and coordination, taking into account the specific impact of intermediary services in each Member State, is essential for effective and consistent application across the European Union. It is important that the Digital Services Coordinators participating in the Board actively contribute to this process.

The members of the Board shall support, advise and assist the European Commission and the other Digital Services Coordinators in their supervisory tasks. They shall exchange views and expertise, consult external experts where necessary and contribute to the analysis of emerging issues related to digital services in the internal market. Participation in the Committee therefore requires an active role in collaboration and joint work to ensure compliance with the DSA, taking into account the specific context of each Member State.

Contribution to the report on the European elections

On 29 July, the Board published a report according to which [no major incidents of disinformation disrupted the European elections](#).

The Authority contributed to the preparation of the report as the DSC for Luxembourg.

This report provides an overview of the measures taken by the European Commission and national DSCs to monitor compliance with the DSA, as well as the actions undertaken under the Code of Practice against Disinformation and by the European Digital Media Observatory (EDMO) in the context of the European elections.



As part of its remits, the Authority participates in the eight working groups set up within the European Board for Digital Services.

Working Group 1 – Horizontal and legal issues

[Working Group 1](#) focuses on interpreting definitions and determining the scope of application of digital services legislation. It also addresses various general legal issues, including fees charged by digital services coordinators. The group also participates in discussions on cooperation with civil society.

The European Commission and the DSC IT chair this working group. It met three times in 2024: on 16 September, 22 October and 27 November.

Working Group 2 – Working together

[Working Group 2](#) examines general working arrangements, including the Board's rules of procedure and cross-border cooperation between competent authorities. It is also responsible for preparing work on annual reports and the early detection of systemic risks, in particular on the handling of complaints and reports. In addition, it examines possibilities for strengthening the capacity of relevant stakeholders to implement the DSA.

The European Commission and the DSC NL chair this working group. It met four times in 2024: on 18 September, 16 October, 13 November and 16 December.

Working Group 3 – Content moderation and data access

[Working Group 3](#) analyses transparency processes and rules relating to trusted flaggers, out-of-court dispute settlement bodies and access to data under Article 40 of the DSA. It supports the Commission's work on developing guidance on these topics. In addition, the working group deals with issues related to intellectual property rights.

The European Commission and the DSC FR chair this working group. It met six times in 2024: on 19 September, 18 October, 14 November, 15 November, 6 December and 10 December.

Working Group 4 – Integrity of the Information Space

[Working Group 4](#) engages in exchanges and discussions on electoral processes, foreign information manipulation and interference, misinformation and disinformation, and other issues related to civic speech.

The European Commission and the DSC SK chair this working group. It met four times in 2024: on 10 September, 14 October, 7 November and 18 November.

Working Group 5 – Consumer protection and online marketplaces

[Working Group 5](#) deals with the interaction between digital services legislation and consumer protection legislation, in particular with regard to Articles 30 to 32 of the digital services legislation. This includes cooperation with consumer protection, customs, market surveillance and other competent authorities.

The European Commission and the DSC DE chair this working group. It met three times in 2024: on 12 September, 15 October and 27 November.

Working Group 6 – Protection of minors

[Working Group 6](#) looks at issues related to the protection of minors, especially Article 28 of the DSA and how it relates to adult content and media literacy. It also supports the Commission's guidelines under Article 28. The Age Verification Task Force has been integrated into this working group.

The European Commission and the DSC IE chair this working group. It met four times in 2024: on 19 September, 15 October, 13 November and 10 December.

Working Group 7 – Orders and criminal issues

[Working Group 7](#) provides for exchanges and discussions on cooperation with law enforcement authorities and on illegal content. This includes injunctions under Articles 9, 10 and 18 of the DSA.

The European Commission and the DSC AT chair this working group. It met four times in 2024: on 13 September, 30 October, 28 November and 13 December.

Working Group 8 – IT issues

[Working Group 8](#) is responsible for discussions on commonly used IT systems, the maintenance and further development of AGORA (the information-sharing platform for Digital Services coordinators) and discussions on future developments in communication and information technology.

The European Commission chairs this working group. It met on 17 September and 10 December.

European Board for Digital Services plenary meetings

In 2024, the [European Board for Digital Services](#) met 12 times: on 19 February, 15 March, 25 April, 28 May, 20 June, 12 July, 9 August, 25 September, 25 October, 19 November, 6 December and 12 December.

These meetings provided an essential platform to discuss the implementation and enforcement of the DSA across the European Union. The meetings allowed its members to engage in in-depth deliberations on various issues and priorities related to the digital services landscape. Each meeting played an important role in advancing the collective goals of ensuring a safe, transparent and innovative digital environment across the EU.

AWARENESS-RAISING ACTIVITIES

The Authority devotes a large part of its activity to raising awareness and informing businesses and consumers about the scope of its competences.

In this context, it regularly relays [relevant communications from the Commission or the EUCJ](#) to raise awareness of the provisions of the DSA among the public and platforms.

It has also participated in or organised various events and published various information pages or brochures specific to the regulation of digital markets.

Ministerial visits

Minister for the Economy

On 6 June, the Authority [welcomed the Minister of the Economy](#), SMEs, Energy and Tourism, Lex Delles, to present its various fields of activity.

After a visit to the premises and a meeting with the Authority's staff, the discussion focused on the new challenges ahead to contribute to the smooth functioning of the economy.

Far from being limited exclusively to competition law issues, the Authority has seen its range of competences broaden over time, adapting to legislation in the face of current economic challenges and realities, particularly those related to digital issues.



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Minister for Consumer Protection

On 18 October, the Authority [welcomed the Minister for Consumer Protection](#), Martine Hansen, to discuss the respective responsibilities and areas of cooperation between the Ministry and the Authority with a view to strengthening consumer protection.

The President of the Authority presented the various areas of competence of the Authority, in particular its tasks within the framework of the DSA.

The Minister emphasised her desire to expand existing cooperation. The Ministry and the Authority will soon draw up a cooperation agreement and have already planned various working meetings with the common aim of strengthening consumer protection.



Conferences

Conference "Digital Services Act and Digital Markets Act"

On 20 February, the Chamber of Commerce organised a conference on the theme '[Digital Services Act and Digital Markets Act: the new rules of the European Digital Services Package and its implementation in Luxembourg](#)'.

President Pierre Barthelmé and the "Digital Markets" department participated in order to raise awareness among companies of the obligations and opportunities arising from the new European regulations.

Around 300 participants accepted the invitation from Carlo Thelen, Director General of the Chamber of Commerce. During the introductory session, the President of the Authority Pierre Barthelmé gave an [overview of](#)



[the state of competition in the face of the digital challenge](#), analysing in detail the characteristics of digital markets, the evolution of the regulatory framework and the governance established at national level.

At the second round table, Romy Schaus, Head of the Authority's *Digital Markets* Department, outlined the measures taken by her department to prepare and assist companies in implementing the new regulation.

Disinfo Day and Networking Event

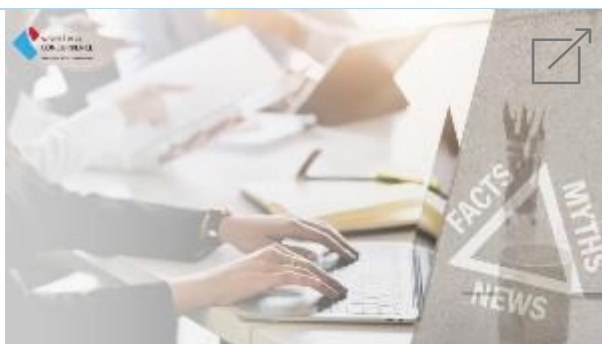
On 15 October, the Authority attended the [Disinfo Day and Networking Event](#) organised by REMEDIS and EDMO BELUX at RTL Luxembourg's premises.

This event brought together researchers, professionals, journalists and experts around the fight against disinformation in the digital age.

Participants discussed how artificial intelligence (AI) can be both a source of disinformation and misinformation and how generative AI is likely to amplify these problems.

They also discussed human and AI-based methods for detecting misinformation, as well as the emotional mechanisms behind its spread.

In addition, the event was an opportunity to review existing fact-checking tools, such as True Media, Vera.ai or Originality. Participants also noted that deepfake images, sounds and videos generated by AI-generated deepfake images, sounds and videos exposed fact-checkers to the risk of being manipulated themselves.



Publications

DSA Guide: new rules for digital actors

On 10 January, the Authority, designated *Digital Services Coordinator*, published on its website [practical information on the new rules applicable to digital actors](#) and a detailed downloadable guide to inform stakeholders about their respective obligations.

As of 17 February 2024, digital players had to comply with the rules laid down by the Digital Services Act (DSA).



DSA: new guide "Protecting your digital environment"

On 27 May, the Authority published its [guide 'Protecting your digital environment'](#) to help internet users easily identify disinformation and take action against potentially illegal content such as hate speech and deep fakes.

In a context where fake news and illegal content are spreading rapidly, especially during election periods, it was essential to support users in identifying and reporting such content.



On 30 September, the Authority published a [practical guide listing the obligations of each intermediary services provider](#) to best support small digital undertakings affected by the DSA.

The Regulation provides for certain reductions in the obligations to be complied with by small and micro-enterprises depending, in particular, on the type of intermediary services provided.

The Authority's Guide therefore lists the obligations to be complied with for each type of provider of intermediary services meeting the criteria of small or micro-enterprise.





2A, RUE D'ANVERS | L-1130 LUXEMBOURG

TÉL. (+352) 247 84737

INFO@CONCURRENCE.PUBLIC.LU | CONCURRENCE.LU