



# Annual Activity Report pursuant to article 55 of the DSA

01 January 2024 – 31 December 2024

## EXECUTIVE SUMMARY

In 2024, the Luxembourg Competition Authority was designated as the national **Digital Services Coordinator (DSC)** under the Digital Services Act (DSA), laying the foundation for a robust and coordinated implementation of the regulation.

During the same year, the Authority received a total of **17 complaints** concerning alleged breaches of the DSA, including five referrals from other DSCs and three complaints forwarded to the Irish DSC. However, as the national implementing legislation for the DSA had not yet entered into force, the procedures and safeguards necessary for the Authority to exercise its enforcement powers were still pending establishment.

Throughout the year, the Authority focused on building **institutional preparedness** and fostering **cooperation** with relevant national and European stakeholders.

It played an active role in **outreach and coordination efforts**, convening workshops to align competent authorities and semi-public institutions in pursuit of a safer online environment. By bringing together key stakeholders, the Authority laid the foundation for enhanced collaboration and horizontal coordination. These initiatives contribute to the improved online protection for individuals and promote a **harmonised, streamlined approach** that offers legal certainty to online intermediary service providers — including online platforms — regarding their obligations under the DSA.

In parallel, the Authority engaged directly with intermediary service providers, including hosting services and online platforms. It issued **awareness letters** to entities potentially subject to DSA obligations, based on findings from a study commissioned by the Ministry of the Economy during the drafting of the national implementing legislation.

The Authority additionally enhanced **public awareness** by issuing guidelines and disseminating publications directed at users, online platforms, and, in particular, small and medium-sized enterprises.

At the European level, the Authority represented Luxembourg in numerous EU-level working groups and events convened through the **European Board for Digital Services**. It actively contributed to pan-European efforts related to data access, disinformation, and the protection of minors.

Accordingly, this formative year was characterised by **institutional capacity-building, regulatory convergence**, and **proactive stakeholder engagement**, ensuring the Authority's readiness to fully undertake its duties as a Digital Services Coordinator.

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# INTRODUCTION

The Digital Services Act (DSA) provides harmonised rules for a safe, predictable and trusted online environment when interacting with so-called 'intermediary services', which includes e.g. 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 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 Competition Authority of Luxembourg (Authority) is the DSC for Luxembourg.

The DSA has fully applied since 17 February 2024, with the exception of VLOPs and VLOSEs, who became subject to the DSA in August 2023.

Article 55 DSA requires every DSC to publish an annual report detailing its activities during the past year. The report must include information on complaints received under Article 53 and 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 should also include information on the actions taken in response to these orders, as communicated back to the DSCs.

The Authority shares its report with the European Commission and the European Board for Digital Services.

# COMPLAINTS (ARTICLE 53 DSA)

Article 53 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 assesses the complaint and, where appropriate, forwards 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 transfers the complaint to the appropriate relevant authority.

On 15 October, the Authority, together with the *Centre des technologies de l'information de l'État (CTIE)*, launched a new online assistant on the Luxembourg Government's secure platform allowing individuals and businesses to carry out administrative procedures "*MyGuichet.lu*".

This tool allows users of online platforms who consider that there has been a breach of the DSA to submit a [complaint to the Authority regarding](#) possible non-compliance.

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## COMPLAINTS IN 2024

In 2024, the Authority received 17 complaints for alleged breaches of the DSA. 12 complaints were directly lodged with the Authority. 5 were received from the German DSC (1), the Dutch DSC (3), and the Swedish DSC (1). The Authority transmitted 3 complaints to the Irish DSC.

- The complaints mainly related to the following topics:
- ✓ Potentially misleading and manipulative presentation of the service (dark patterns)
  - ✓ Content removal and user account blocking
  - ✓ Point of contact of the platform
  - ✓ Use of the mechanism for reporting illegal content established by the platform.

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)

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## COMPLAINTS THAT LED TO FORMAL INVESTIGATIONS IN 2024

In 2024, the Authority did not launch any formal investigation stemming from a complaint received under Article 53 of the DSA.

# ORDERS (ARTICLES 9 AND 10 DSA)

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 providers receive such an order, they must inform the issuing authority (or another specified authority) of 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 of the Member State of issuance. The DSC will then share this information with all other DSCs.

Article 10 DSA requires 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 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, the Authority did not receive any orders pursuant to Articles 9 and 10 DSA.

Total number of orders received	0
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## EFFECTS GIVEN TO THE ORDERS

In 2024, the Authority did not receive any orders pursuant to Articles 9 and 10 DSA.

# OUT-OF-COURT DISPUTE SETTLEMENT BODIES (ARTICLE 21 DSA)

Under the DSA, out-of-court dispute settlement (ODS) 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 problems and are also required to cooperate with the procedures of certified ODS bodies.

Upon request, DSCs certify ODS bodies located in their Member State if they meet the statutory requirements set out in Article 21 DSA. For example, the ODS bodies must be independent. In addition, they must have sufficient expertise, for example, in a certain type of illegal content. ODS bodies must handle disputes in at least one official EU language.

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## CERTIFICATION OF OUT-OF-COURT DISPUTE SETTLEMENT BODIES IN 2024

The Authority did not certify any ODS bodies in 2024.

Total number of ODS bodies certifications	0
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# TRUSTED FLAGGERS (ARTICLE 22 DSA)

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. DSCs oversee the application process, ensuring entities meet the criteria laid down in Article 22 DSA, such as independence from any online platform or specific expertise.

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## STATUS GRANTED TO TRUSTED FLAGGERS IN 2024

In 2024, the Authority received one application from an organisation requesting the award of the trusted flagger status. The Authority did not reject any trusted flagger application in 2024.

Total number of trusted flaggers status awarded	0
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# VETTED RESEARCHERS (ARTICLE 40 DSA)

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 VLOPs and VLOSEs. 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 VLOPs or VLOSEs can grant the status to a researcher when the researcher has demonstrated to meet the conditions laid down in Article 40 DSA.

VLOPs and VLOSEs are required to give researchers access to that data to the researchers that have been granted the status of vetted researchers.

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## STATUS GRANTED TO VETTED RESEARCHERS IN 2024

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

It will clarify the procedures leading to the sharing of data by VLOPs and VLOSEs with authorised researchers. It will also specify the conditions for providing such data and establish a DSA data access portal that will serve as a one-stop shop for researchers, data providers and coordinators for digital services. Consequently, no vetted researcher status has been granted in 2024 by the Authority.

Total number of vetted researchers status awarded	0
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# ENFORCEMENT, NATIONAL AND INTERNATIONAL ACTIVITIES

In 2024, 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.

## ENFORCEMENT ACTIVITIES AND INVESTIGATION POWERS USED IN 2024

In 2024, the Authority did not engage in formal enforcement activities.

## NATIONAL ACTIVITIES IN 2024

### STAKEHOLDER EVENTS

The Authority bears responsibility for ensuring effective coordination at the national level in all matters pertaining to the oversight and enforcement of the DSA. In parallel, a range of other national authorities are involved in the enforcement of other national and European legislation against illegal content – including, inter alia, data protection and consumer law, product safety regulations and audiovisual media provisions, and the criminal code.

With this in view, the Authority organised two collective brainstorming workshops bringing together various authorities, ministries and semi-public actors with the aim of determining future cooperation between stakeholders striving towards a safer online environment.

#### 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.



### 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

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### Minister for the Economy

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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.



### Minister for Consumer Protection

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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

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### Conference 'Digital Services Act and Digital Markets Act'

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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 on 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 AI-generated exposed fact-checkers to the risk of being manipulated themselves.



## Publications

### DSA Guide: new rules for digital actors

On 10 January, the Authority 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 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.

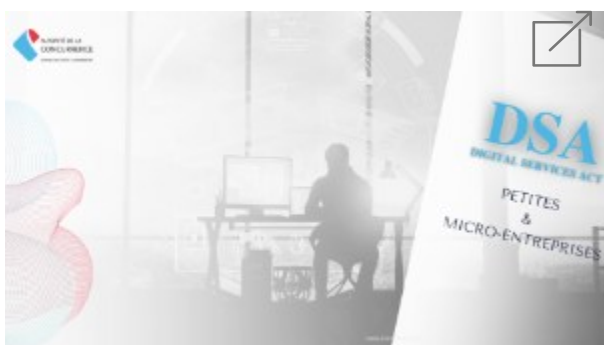


### DSA: guide for small and micro-enterprises

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-enterprises.



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## INTERNATIONAL ACTIVITIES

### COLLABORATION WITH OTHER AUTHORITIES

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Beyond the mutual transmission of complaints, the Authority has collaborated with other DSCs in several ways, such as responding to requests for information or bilateral exchanges with the competent authorities of other Member States on topics of shared interest.

### MONITORING AND SUPPORTING THE COMMISSION'S ACTIVITIES

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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 VLOPs, 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.



### ROUND TABLE ON ACCESS TO DATA BY AUTHORISED RESEARCHERS

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On 9 December 2024, the Authority participated in a technical round table organized by the European Commission, bringing together researchers, VLOPs, VLOSEs and other DSCs. The purpose of the meeting was to discuss the practical implementation of data access for accredited researchers in the context of the European Commission's preparation of the delegated act.

This initiative is in line with the DSA's objectives of ensuring the transparency and accountability of online platforms.

### WORKSHOP ON THE PROTECTION OF MINORS

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During a workshop organized by the European Commission on 4 October 2024, the Authority discussed with online platforms, representatives of various organisations, and other DSCs. The Authority duly took note of the challenges reported by the various actors in implementing the DSA.

In this regard, the Commission informed participants about the upcoming guidelines that will help online platforms to ensure a high level of privacy, safety, and security for minors in the digital environment.



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## 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 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 European Board for Digital Services held a total of 12 meetings.<sup>1</sup> 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.

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

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### 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 the civil society.

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

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### 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 Dutch DSC chair this working group. It met four times in 2024: on 18 September, 16 October, 13 November and 16 December.

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### 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 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 French DSC chair this working group. It met six times in 2024: on 19 September, 18 October, 14 November, 15 November, 6 December and 10 December.

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### 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 Slovak DSC chair this working group. It met four times in 2024: on 10 September, 14 October, 7 November and 18 November.

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

## WORKING GROUP 5 – CONSUMER PROTECTION AND ONLINE MARKETPLACES

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

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

## WORKING GROUP 6 – PROTECTION OF MINORS

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Working Group 6 looks at issues related to the protection of minors, especially Article 28 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 Irish DSC 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

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Working Group 7 provides for exchanges and discussions on cooperation with law enforcement authorities and on illegal content. This includes orders under Articles 9, 10 and 18 DSA.

The European Commission and the Austrian DSC 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

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Working Group 8 is responsible for discussions on commonly used IT systems, the maintenance and further development of AGORA (the secure information-sharing platform for DSCs and the European Commission) 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.

## CONTRIBUTION TO THE REPORT ON THE EUROPEAN ELECTIONS

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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 and took contributions from other national authorities into account.

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.



## CONCLUSION

In 2024, the Authority focused its efforts on **preparatory actions**: developing internal resources, establishing national cooperation channels, participating in EU-level initiatives and promoting public awareness of digital rights and obligations.

The Authority demonstrated **institutional dynamism** through strategic collaborations, educational tools and consistent engagement with European stakeholders.

The **adoption of the national implementation law** will further strengthen the Authority's activities by enabling it to conduct investigations and carry out enforcement actions. This will allow the Authority to contribute effectively to the objectives of the DSA and foster a safer, more transparent digital environment.





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