

# DSA Research Network's Circle of Friends | Recap of the 3<sup>rd</sup> meeting

**Tuesday, 4 November 2025 – 3-4:30 pm (CET)**

The third meeting of the Circle of Friends of the DSA Research Network built on the ongoing discussions within the community to further advance reflections on the early implementation phase of the Digital Services Act (DSA). With the evaluation of the DSA already on the horizon and political debates around platform regulation intensifying, the group focused on identifying early reform ideas, sharing current projects, and discussing the challenges emerging from enforcement practice. Topics such as the role of data access under Articles 40 and 44, the political pressure surrounding national Digital Services Coordinators, and the practical obstacles of audits and risk assessments provided important entry points for the conversation.

The following provides a summary of the meeting's discussion:

## 1. Introduction: The context of evaluation within the DSA

Participants discussed the importance of placing early implementation challenges on record before they become normalised or forgotten. The systematic collection of reform proposals was outlined:

- Many practical challenges surface during implementation, but fade from view by the time formal evaluations begin.
- Stakeholders often enter evaluation processes unprepared, reducing their influence on potential reforms.
- With the Commission's review timeline approaching quickly, the project aims to gather concrete, actionable reform ideas - not broad criticisms of the DSA or its overall objectives.

## 2. Updates from members of the Circle of Friends

Participants reported on ongoing research, new initiatives, and practical challenges across different DSA provisions.

### Article 21 and dispute settlement

- A new working group on Art. 21 out-of-court settlement bodies has been launched, facilitated by Jonny Shipp. Events are planned for mid-2026, alongside preparations for the next European Rights & Risks Stakeholder Engagement Forum.

#### **National enforcement and public expectations**

- The French Digital Services Coordinator (DSC) continues to expand its network-building efforts, including cooperation with public prosecution services.
- Public expectations in France remain high, with many assuming the DSA mandates direct content moderation interventions—putting political pressure on the DSC.
- [Arcom's 4th Research Day](#) on 13 November will include simultaneous French/English interpretation.

#### **Data access, transparency and systemic risks**

- New studies on systemic risk assessments, data access under Art. 40, and pathways towards Art. 44 were presented, including:
  - a full report on systemic risks (German) and an English summary,
  - research on TikTok ahead of the German federal election,
  - an updated [public data catalogue for Art. 40\(4\)](#).
- Civil society organisations note increasing awareness among users regarding their dispute settlement rights, alongside growing caseloads.

#### **Civil society cooperation and international attention**

- Preparations for the annual [DSA Civil Society Roundtable](#) on 21 November are underway, featuring workshops co-organised with a broad network of CSOs.
- U.S. organisations increasingly scrutinise the DSA—sometimes to highlight contradictions in global debates on free speech.

#### **Platform research and data access challenges**

- Researchers are preparing new data access requests to X in the context of the Hungarian elections, anticipating rejections and planning legal action.

- Multiple masked data access requests to major platforms (LinkedIn, Meta, TikTok, YouTube) have been denied, with escalations planned.
- Ongoing research includes investigations into Google AI overviews, “nudification apps,” and [explanations of Art. 40.12 processes](#).

#### **Building research networks**

- A recent Art. 44 Data Access Collaboratory meeting highlighted strong community interest in unlocking this instrument, particularly in light of transatlantic policy dynamics.

### **3. Update on the upcoming Amsterdam DSA conference**

The programme for the [DSA & Platform Regulation Conference 2026](#) was presented, noting strong submissions to the [call for papers](#). It was highlighted that the unprecedented political pressure, especially from the U.S., shapes the context in which DSA reform ideas will be received.

Additional updates included:

- A report on pathways to private enforcement of the DSA,
- ongoing work on the DSA Observatory,
- further details on the conference website and expected themes.

The group discussed how political realities may complicate the evaluation process and how research communities can respond.

### **4. Discussion: Early reform proposals and evaluation challenges**

The project’s three-level framework for potential reform proposals was outlined—substantive, procedural, and organisational—and the draft reform proposal database was presented.

Key points of discussion included:

#### **Digital Fairness Act (DFA) as a reform vehicle**

- Some see limited potential for addressing DSA issues via the DFA, especially in influencer marketing or recommender system transparency.

- Others expressed scepticism given the current deregulatory mood.

### **Risks of reopening the DSA**

- Participants debated whether proposing reforms risks triggering undesirable political changes.
- Suggestions included exploring improvements that do not require legislative amendments.

### **Concerns about unintended consequences**

- Some warned that opponents could use well-intentioned proposals to undermine fundamental rights protections.
- Comparisons with the GDPR evaluation process underscored uncertainty about the extent of stakeholders' influence.

### **Commission review timeline**

- Participants reported that consultations for the Art. 91 review are already underway, with calls for tenders issued earlier in the year.
- Concerns were raised that the DSA is still too new for meaningful evaluation, yet the Commission's internal timelines proceed regardless.

### **Auditing and risk assessments**

- Audit standards were identified as a major area requiring improvement: costly, burdensome, and currently unsatisfactory for platforms, audit firms, and researchers alike.
- Debate followed on the purpose of audits—whether they should document internal processes or make substantive judgements.
- Suggestions included auditor rotation and clearer expectations.

### **Civil society capacity and consultation fatigue**

- Participants highlighted the tension between contributing meaningfully to consultations and avoiding unsustainable workloads.
- Calls were made for clearer, more coordinated consultation mechanisms.

### **HIIG reform proposals**

- Presentation of a proposal from the Human in the Loop project (HIIG) on improving human–machine collaboration in content moderation, including an associated [code of conduct](#).
- Participants noted the relevance of these ideas in light of the possible future designation of generative AI systems as VLOSEs.

### **Regulatory complexity**

- Some participants stressed the importance of simplifying regulation where possible to avoid the perception of pushing for “overregulation.”

Discussions during the third meeting of the Circle of Friends underscored the growing relevance of early reform thinking as the DSA moves from initial implementation towards its first evaluation cycle. Participants highlighted persistent challenges in areas such as data access, risk assessments, and auditing, as well as the political pressures shaping national and European enforcement landscapes. Despite differing views on the scope and timing of potential reforms, there was broad agreement on the importance of strengthening collaborative networks, ensuring meaningful civil society participation, and developing concrete, actionable proposals that improve—rather than dilute—the DSA’s regulatory effectiveness.

The next meeting of the Circle of Friends will take place in April 2026, the exact date will be announced shortly.