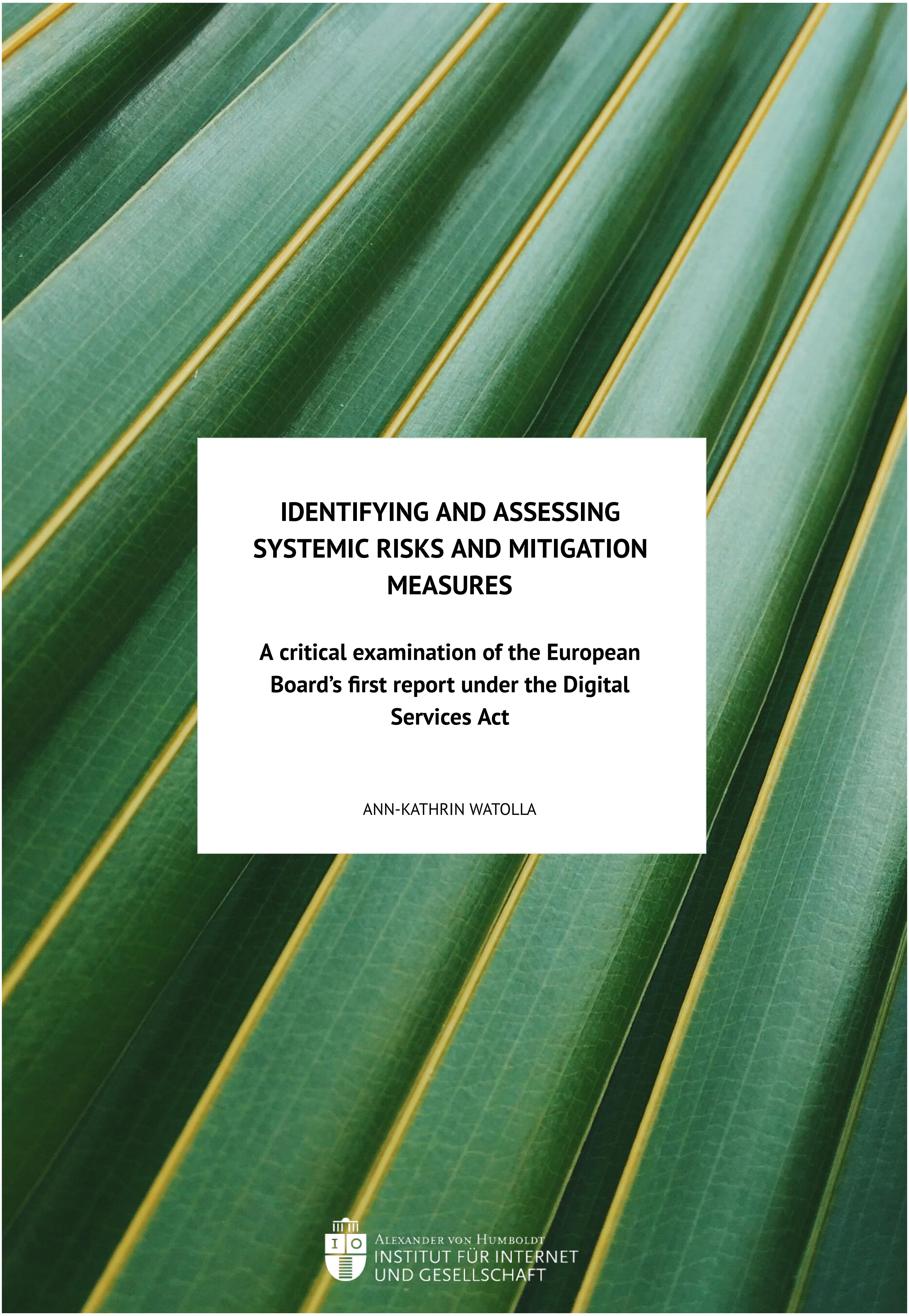

IDENTIFYING AND ASSESSING SYSTEMIC RISKS AND MITIGATION MEASURES

A critical examination of the European Board's first report under the Digital Services Act

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Identifying and assessing systemic risks and mitigation measures

A CRITICAL EXAMINATION OF THE EUROPEAN BOARD'S FIRST REPORT UNDER THE DIGITAL SERVICES ACT

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Berlin, April 2026

1 EXECUTIVE SUMMARY

The Digital Services Act (DSA) introduces a risk-based regulatory framework for very large online platforms (VLOPs) and search engines (VLOSEs) requiring them to identify, assess and mitigate systemic risks as well as to report on their efforts annually. In turn, the European Board for Digital Services must publish an annual overview of the most prominent and recurrent systemic risks, as well as the related mitigation practices. This paper critically examines the Board's first report, arguing that, in its current form, it largely remains a descriptive compilation of outputs and therefore fails to deliver on the risk-based approach set out in the DSA.

The critical examination begins with an assessment of the foundations of the Board's report. By focusing on how the report uses and documents its sources, it becomes apparent that there is no clear mapping between specific sources and particular claims. This asymmetry hinders transparency, making it difficult to understand how different types of evidence inform the report's findings.

The paper then moves on to the identification of systemic risks. While the DSA considers both actual and foreseeable negative effects, the Board limits its report to risks that have already materialised. This narrows the framework's intended anticipatory function. Drawing on risk assessments provided by social media platforms, the paper argues that including the assessment of systemic risks, rather than just their identification, would facilitate cross-platform comparisons. By failing to examine the prominence and recurrence of systemic risks across services or Member States, the Board is missing an opportunity to fulfil its mandate.

Regarding mitigation measures, the paper highlights that the report's catalogue of measures suggested by providers and CSOs does not evaluate their reasonableness, proportionality, or effectiveness. This neglects to identify 'best or even good practices', despite this being required by the DSA. Furthermore, the paper showcases how the report's disclaim of any assessment of whether platforms comply with their obligations limits its added value beyond synthesising information already made public by digital services, CSOs and academia.

The paper concludes that future versions of the Board's annual report should shift from summarising to examining to allow for more insights on systemic risks and their mitigation measures.

2 INTRODUCTION

In an effort to facilitate a “safe, predictable and trusted online environment” (Art. 1 (1)), the Digital Services Act (DSA) introduces new transparency guidelines and obligations for digital services. Those with more than 45 million active monthly users are required to fulfil additional obligations in identifying, assessing and mitigating systemic risks emerging on and from their services (Arts. 34 and 35), and must also make their processes for complying with the DSA publicly available[1]. The supervision and enforcement process overseen by the European Commission and the Member States’ Digital Services Coordinators (DSCs) aims to ensure accountability and public scrutiny. The DSCs collaborate within the European Board for Digital Services (the Board).

As part of this supervisory role, the European Commission requires the Board to publish an annual report identifying and assessing “the most prominent and recurrent systemic risks” (Art. 35 (2) (a)) and “best practices […] to mitigate the systemic risks identified” (Art. 35 (2) (b)). This forms part of a broader approach that empowers the European Commission to “issue guidelines on [the mitigation of risks] in relation to specific risks, in particular to present best practices and recommend possible measures, having due regard to the possible consequences of the measures on fundamental rights enshrined in the Charter of all parties involved” (Art. 35 (3)). In order to achieve this goal, however, the Board needs to critically examine the risk assessments provided by digital services and draw from the in-depth analyses conducted by academia and civil society organisations in order to advance the DSA’s risk-based approach to platform regulation further.

Therefore, the following sets out to scrutinise the report’s objectives of providing “an overview of the most prominent and recurrent risks […] and of certain risk mitigation practices” (2025, 1) based on insights from the first two rounds of risk assessment reports provided by digital services. In order to provide a concise review of the Board’s contribution to the DSA’s risk-based approach, this paper focuses on social media platforms given their distinctive role in today’s societies. This paper also highlights areas where the Board’s first edition of identifying systemic risks and their respective mitigation measures is lacking. The goal is therefore to propose potential courses of action to ensure that the risk-based approach protects the users and values of the European Union effectively.

[1] This includes annual risk assessment reports, quarterly transparency reports as well as ad-hoc reports prior to launching new functionalities.

3 Foundation of the Board’s report

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While multiple sources were used to prepare the report, a
clearer depiction of how these sources inform the
different parts of the report could provide guidance on
areas in need of further research.
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In order to “provide an overview of the most prominent and recurrent systemic risks […] and an overview of certain risk mitigation practices” (2025, 1), the Board’s report draws from a variety of sources. These range from information provided by the digital services themselves to publicly available analyses conducted by civil society organisations and academia (2025, 4-5). Examining the Board’s depiction of how the report was prepared reveals two key points. Firstly, the level of detail in the presentation of the sources varies greatly between the information provided by the digital services and the analyses provided by civil society organisations and academia. For the information provided by the digital services, the sources used are set out in detail, including risk assessment reports and a myriad of transparency outputs[2]. In this context, the report states how many digital services have been designated as VLOPs or VLOSEs at the time of publication, which points to the scope of information included in the report. This enhances readers’ understanding of the scope of systemic risks and the respective mitigation measures from the digital services’ perspective. However, with regard to the analyses by civil society organisations and academia, the report merely states that “the Board and the Commission relied on the best available information and scientific insights currently available […] due to their relevance and quality” (2025, 5). While the report’s annex clarifies that input contributing to the report came “either upon invitation or through spontaneous submissions” (2025, 42), it does not provide a clear depiction of the report’s bibliography aside from a brief overview of specific sources included in the report. Publishing this information would enhance transparency and shed light on possibly overlooked perspectives.

Secondly, the report does not specify how the various sources are specifically applied to the argumentation throughout. While it does cite sections of the digital services’ risk assessment reports, this is only to exemplify specific aspects like different risk areas (see p. 12). Apart from these instances, it remains unclear how exactly the sources inform the report. However, this is crucial to advancing the risk-based approach of the DSA by providing deeper insights into the processes digital services use to identify, assess and mitigate systemic risks. As an example, the

[2] These include DSA advertisement repositories, transparency reports and audit implementation reports.

report broadens the risk area of civic discourse, electoral processes and public security by explicitly incorporating public figures as well as crises and disasters. These additions are based on “[s]everal VLOPs and VLOSEs providers and CSOs [having] reported systemic risks related to the representation and treatment of public figures in online environments” (2025, 20) and “[p]roviders and CSOs [having] reported systemic risks linked to the viral dissemination of disinformation and misinformation during or following crises, whether natural or human made” (2025, 21). Disclosing which digital services have identified these risks, and on which digital services CSOs have identified them in their analyses, could provide insight into the relationship between these risks and the nature of the digital services on which they occur. Additionally, being able to trace the argument about crises and disasters to specific sources would clarify how they are differentiated from other risks, such as public security.

These two key points highlight how the transparency and traceability of the Board’s reports could be improved in the future. Given the purpose of the report and its role in enforcing and supervising compliance with the DSA, a more rigorous approach would strengthen the Board’s position and provide a valuable overview of the landscape of systemic risks. The Board’s concise annual overview of the identification and mitigation of systemic risks could reveal those areas in need of further research.

4 Prominent and recurrent systemic risks

When insights from risk assessment reports provided by social media platforms are connected with the board's overview of the most prominent and recurring risks, a lack of scrutiny of the platforms' approaches to identifying and assessing systemic risks is revealed.

One of the Board’s report’s two main objectives is to present “an overview of the most prominent and recurrent systemic risks that may stem from VLOPs and VLOSEs” (2025, 6). However, a glance at the table of contents reveals that the designated chapter (Chapter 3) is structured along the same four risk areas as the DSA (Art. 34), in the same order. This raises the question of whether the report actually identifies systemic risks within the platform ecosystem, let alone assesses their prominence and recurrence. An analysis of the first two rounds of risk assessment reports provided by social media platforms enables a critical examination of how systemic risks are identified and assessed in the Board’s report.

Before examining how these prominent and recurrent systemic risks are identified in the Board's report, it is important to consider the scope of risk assessments. While the DSA explicitly includes "any actual or foreseeable negative effects", the report not only clearly strays away from this scope, entirely neglecting the anticipation of foreseeable threats by stating that "it does not present an overview of risks that would have materialised" (2025, 6). Consequently, by omitting any foreseeable threats, the report only covers a fraction of what the DSA intends to include in the risk assessments.

Identifying systemic risks

When identifying systemic risks, the four risk areas prescribed in the DSA (Art. 34 (1)) are always the first point of reference. As mentioned above, the same applies to the Board's report, in which the entire chapter on systemic risks is structured around these areas. However, this depiction in the DSA is not intended to provide an exhaustive list, but rather to serve as guidance on which systemic risk areas need to be included in the annual risk assessment reports. Therefore, while the Board's approach mirrors that of the digital services, a more critical examination of how digital services approach the process of identifying systemic risks would have transformed this section of the report from a summary into an in-depth analysis. This is not only important because only very few digital services actually provide a definition of what they consider to be systemic risks - and if they do, they closely follow the wording used in the DSA (see for example Pinterest, 2024, 8). It is also important because examining the definition provided by X, for example, reveals a particular perception of platforms' role and responsibilities in combatting systemic risks:

> "X is situated in a multi-platform risk environment and bad actors can misuse the service in the same way they misuse other social media platforms. Many risks and harms that manifest on X appear as extensions of often already rapidly evolving offline risks. These risks interact in complex and novel ways across the online platform ecosystem. While our controls are constantly working to reduce harm, we recognise that bad actors may stay a step ahead, and our platform is not invulnerable to manipulation."
> — (2024, p. 7)

Upon closer inspection, it becomes apparent that, despite referencing the risks stemming from the design and functioning of their service as outlined in the DSA, the responsibility of "[ensuring] a safe, predictable and trusted online environment" (DSA, recital 3) is shifted from providers of digital services to bad faith actors. This is important because it suggests that digital services are not accountable, which undermines the purpose of the DSA. It also highlights the importance of examining in the Board's annual report the definitions of systemic risks provided by digital services. This is especially pertinent given the extensive discussion of the term's scope among civil society organisations and academia (see for example Broughton Micova & Calef, 2023).

Given the lack of consensus on how systemic risks are conceptualised and perceived, it is unsurprising that the risk assessment reports focus primarily on the aforementioned four risk areas. One notable exception is Meta (2024a; 2024b), which has added a new risk category called "Deceptive and Misleading" for both Facebook and Instagram. This category encompasses "behaviour and content that is designed to deceive, mislead, or defraud users usually for personal gain" (Meta, 2024a, p. 4). While one could argue that this category is deeply ingrained in the risk areas set out in the DSA, Meta's addition of this category may also indicate the extent of the issue on their platforms. Any additional identification of systemic risks beyond the provided categories is limited to a differentiation within the provided risk areas. When it comes to the dissemination of illegal content, platforms further differentiate between terrorist content (Google, 2024; Snapchat, 2024; TikTok, 2024; X, 2024), illegal hate speech (Meta, 2024b; LinkedIn, 2024; Snapchat, 2024; TikTok, 2024; X, 2024), child and sexual abuse material (CSAM) (Google, 2024; Snapchat, 2024; TikTok, 2024; X, 2024), and IP and copyright infringement (Google, 2024; Pinterest, 2024; TikTok, 2024; X, 2024). Snapchat (2024) and X (2024) further explicate the negative effects on the exercise of fundamental rights, including encouraging or assisting suicide, unlawful immigration and human trafficking, harassment, stalking, and abusive offences. While these differentiations are implicitly incorporated into the Board's report, the altered scope of the risk area "civic discourse, electoral processes and public security" (DSA, Art. 34(1)(c)), to include public figures as well as crises and disasters (2025, 18f.), remains unclear, as the report offers no explanation or argument for this change.

Assessing systemic risks

Given that the report aims to provide an overview of the most prominent and recurrent systemic risks, one might expect the assessment of these risks to form a central part of the Board's report. However, rather than providing in-depth insights into the dominance and recurrence of systemic risks across different types of digital service, the report merely summarises parts of the published risk assessment reports. It fails to consider which risks occur more frequently and how their prominence and recurrence may vary across the EU. This is surprising, given that the introduction to the chapter highlights that some systemic risks probably manifest differently across the EU while others are likely to be quite similar. This is also a requirement of the DSA (Art. 35(2)), yet these aspects are never mentioned again.

By failing to scrutinise the varying approaches to risk assessments provided by digital services, the report not only fails to live up to its aims, it also misses an opportunity to address this issue. Zooming in on social media platforms reveals that they mostly adhere to the DSA's provision to consider "the severity of the potential impact and the probability of all such systemic risks" (DSA, recital 79), though there are some nuances worth noting. Firstly, some risk assessment reports further differentiate the severity of a risk into different dimensions. For X, these include scope, scale, and remediability (2024, p. 9), whereas Google only considers scope and remediability (Google, 2024, p. 56). Similarly, Meta applies a severity rubric encompassing scope, the nature of the impact, and the impacted demographic (2024a, p. 90; 2024b, p. 88), while TikTok quantifies severity based on scope (i.e. the number of users or people affected in the EU), scale (ranging from individual to broader societal impacts), the nature of the potential impact (physical, psychological, etc.), and the impacted demographic (2024, p. 8). Furthermore, the severity of risk is assessed using different scales, ranging from none for Google (2024) to three levels on a Likert scale (Snapchat, 2024, p. 31), four levels (Pinterest, 2024), or five levels (LinkedIn, 2024, p. 67; Meta, 2024a, p. 90; Meta, 2024b, p. 88; TikTok, 2024, p. 8; X, 2024, p. 75). A similar picture emerges from the assessment of probability, though TikTok quantifies probability by assessing likelihood and historical volume (TikTok, 2024, p. 8), while Google takes into account likelihood and frequency (Google, 2024, p. 44). This further complicates cross-platform comparisons, as Meta (2024a, 2024b) and Snapchat (2024) equate probability and likelihood, basing their assessments on the latter. Once again, the scales used vary considerably, ranging from none for Google (2024) to a three-point Likert scale for Snapchat (2024, p. 30), a four-point scale for LinkedIn (2024, p. 67), TikTok (2024) and X (2024, p. 75). Additionally, assessments of systemic risk across platforms further include the inherent risk rating (i.e. the severity and probability of systemic risk before any mitigation measures are applied) and the residual risk rating (i.e. the severity and probability of systemic risk after mitigation measures have been applied).

Taking a closer look at these assessments reveals significant differences between the platforms. For instance, the systemic risk of disseminating illegal content is evaluated differently. Pinterest uses a four-level Likert scale to assess the probability as (2) possible and the severity as (3) significant. This results in a medium risk rating, and the effectiveness of controls leads to a low residual risk (2024, p. 18). Facebook's depiction of the assessment does not include a specific assessment of probability and severity, but rather an inherent risk level of tier 5 for CSAM, tier 2 for IP infringement and tier 4 for hate speech. Each of these moves to tier 2 as a residual risk (Meta, 2024a, p. 42). The risks related to illegal content appear to be lower for Instagram, with CSAM and hate speech being assessed at tier 4 and moving to a residual risk of tier 2, and IP infringement being assessed at tier 2 and moving to a residual risk of tier 1 (2024b, p. 41).

5 Mitigation measures

Providing an overview of the actual and potential risk mitigation measures described by digital services or suggested by CSOs can only be a first step in examining how effective these mitigation practices are and how they can be improved.

The report aims to provide an "overview of certain risk mitigation practices" (2025, p. 1). It does this by outlining the measures set out in the DSA (Art. 35(1) (a–k)), except for those related to protecting children's rights, which are incorporated into the others (Board, 2025, p. 31). The depicted risk mitigation measures compile summaries of outputs published by digital service providers and inputs provided by CSOs. However, these measures are simply listed, with no consideration given to their reasonability, proportionality or effectiveness, despite these being requirements set out in the DSA (Art. 35). As the risk assessment process includes evaluating the effectiveness of mitigation measures, it would be beneficial for the report to include these evaluations, providing an overview of the available mitigation measures and shedding light on their effectiveness in mitigating targeted risks.

This would require linking the depicted mitigation measures to the previously identified risk areas. However, the report neglects to mention the additional mitigation measure often implemented by social media platforms: the introduction of crisis protocols (LinkedIn, 2024; TikTok, 2024; X, 2024). This is despite the fact that the risks associated with “the viral dissemination of disinformation and misinformation during or following crises, whether natural or human-made” (2025, p. 21) are specifically highlighted. While these crisis protocols reinforce internal processes, they also provide a flexible structure that enables a quick response to global or local emergencies.

Even though the DSA requires it (Art. 35 (2)), the Board shies away from identifying the “best or necessarily even good practices” when listing mitigation measures. Furthermore, the report states that “nothing in this report should be interpreted as constituting an assessment or evaluation of compliance by designated VLOPs and VLOSEs” (2025, p. 31). This raises the question of whether these annual reports contribute anything more to our understanding of the landscape of systemic risks than a mere summary of the outputs provided by digital service providers, CSOs and academia.

6 CONCLUSION

A close examination of how systemic risks and mitigation measures are identified in the Board's initial annual report reveals that subsequent versions could benefit from a more in-depth analysis rather than a mere summary. This is also consistent with the idea that 'the accumulation of future editions will, over time, provide a long-term perspective on which systemic risks are the most prominent and recurrent from year to year' (2025, p. 41). A clearer focus on assessing systemic risks, rather than merely identifying them, would enable the Board to draw conclusions about the prominence and recurrence of systemic risks, which is the objective of the report. Furthermore, including an assessment of risks in the report would provide answers to the question of which mitigation measures are most reasonable, proportionate and effective for each risk. These measures may vary depending on the type of platform, a fact only hinted at in this first version. Differentiating between how systemic risks manifest on marketplaces and social media platforms, for example, would contribute to a better understanding of systemic risks and mitigation measures under Articles 34 and 35 of the DSA.

This paper therefore suggests several key improvements to the Board's annual report for future versions:

- clearer documentation and use of sources to increase transparency and traceability;
- Systematic scrutiny of how digital services conceptualise and scope systemic risks, providing a solid foundation for the DSA's risk-based approach,
- Comparison of risk assessments and evaluation of the effectiveness of mitigation measures to gain in-depth insights into the connection between systemic risks and their respective mitigation measures, paying attention to variations across EU member states and platform types.

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