

ANNUAL ACTIVITY REPORT

PURSUANT TO
ARTICLE 55 OF THE
DIGITAL SERVICES ACT

01 JANUARY 2024 –
31 DECEMBER 2024



CROATIAN REGULATORY AUTHORITY
FOR NETWORK INDUSTRIES

ANNUAL ACTIVITY REPORT

Pursuant to Article 55 of the Digital Services Act

01 January 2024 – 31 December 2024



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1. Introduction

General introduction DSA

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 Service Coordinators (DSCs), other national regulators designated as competent authorities in their Member States and for VLOPs and VLOSEs by the European Commission.

The DSA has fully applied since 17 February 2024.

The Croatian Regulatory Authority for Network Industries (HAKOM) serves as the Digital Services Coordinator for Croatia. HAKOM has held this role since 15 February 2024, following its appointment by a Decision of the Government of the Republic of Croatia (Official Gazette No. 19/2024)¹. It should be noted that, at the time of writing this report, the aforementioned Decision has been repealed, and HAKOM continues to perform the role pursuant to the Act on the Implementation of Regulation (EU) 2022/2065 (Official Gazette No. 67/2025)², which entered into force on 17 April 2025.

Background information

Article 55 of the DSA requires every DSC to prepare and publish an annual report detailing its activities during the past year. The report must include information on complaints received under Article 53 of the DSA 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 DSC will also share its Annual Activity report with the European Commission and the European Board for Digital Services.

¹ https://narodne-novine.nn.hr/clanci/sluzbeni/2024_02_19_306.html

² https://narodne-novine.nn.hr/clanci/sluzbeni/2025_04_67_857.html

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

As the competent authorities responsible for supervision and enforcement under the DSA were formally designated in 2025 in Croatia, after the reporting period, this report does not include information from these authorities. Such information will be included in subsequent annual reports following the commencement of their operational activities.

2. Complaints (Article 53 of the DSA)

Introduction

Article 53 of the 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 will assess the complaint and, where appropriate, forward it to the DSC in the Member State where the provider of the intermediary services is established, possibly accompanied by an opinion. If the complaint falls under the responsibility of another competent authority within the same Member State, the DSC will transfer the complaint to the appropriate relevant authority.

Complaints in 2024

During 2024, HAKOM received four complaints at the national level (removal of advertisements, account suspension, illegal content, and o online interface organisation). One complaint was submitted against a Croatian platform. The remaining three concerned Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs), but were not forwarded to the respective Digital Services Coordinators of establishment. In these cases, the issues were either resolved directly by the complainants with the platforms concerned, or the conditions for referral were not met — for instance, where the complainants had not contacted the platforms prior to lodging the complaint. HAKOM did not receive any complaints from other DSCs.

Complaints that led to formal investigations in 2024

In 2024, HAKOM did not initiate any formal investigation based on complaints received under Article 53 of the Digital Services Act (DSA).

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

Introduction

Article 9 of the DSA outlines the obligations of providers of intermediary services when they receive an order from national judicial or administrative authorities to act against illegal content. First, when a provider receives such an order, they must inform the issuing authority (or another specified authority) about any effect given to the order, specifying if and when effect was given to the order. The article also sets conditions for the orders issued by national authorities.

The issuing authority, or another specified authority if this is stated in the order, must share the order and any information about its implementation with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

Article 10 of the DSA obliges providers of intermediary services to promptly inform the relevant national judicial or administrative authority, or any other authority specified in the order, upon receiving an order to provide specific information about individual recipients of their services. Similarly to Article 9 DSA, Art 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.

Effects given to the orders

In 2024, HAKOM did not receive any orders pursuant to Articles 9 or 10 of the Digital Services Act (DSA), as the competent authorities empowered to issue such orders had not yet been designated.

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

Introduction

Under the DSA, out-of-court dispute settlement bodies offer an additional opportunity for users to resolve content moderation disputes with online platforms. Online platforms must inform users of this option for resolving problems and are also required to cooperate with the procedures of certified dispute settlement bodies. Upon request, DSCs certify dispute settlement bodies located in their Member State if they meet the statutory requirements set out in Article 21 of the DSA. For example, the dispute settlement bodies must be independent. In addition, they must have sufficient expertise, for example, in a certain type of illegal content. Dispute settlement bodies must handle disputes in at least one official EU language.

Certification of out-of-court dispute settlement bodies in 2024

In 2024, HAKOM did not certify any out-of-court dispute settlement bodies, as the national legislation enabling such certification had not yet been adopted. Furthermore, no potential out-of-court dispute settlement bodies expressed interest or contacted HAKOM during the reporting period.

5. Trusted Flaggers (Article 22 of the DSA)**Introduction**

Under the DSA, trusted flaggers are responsible for detecting potentially illegal content and alert online platforms. They are experts at detecting certain types of illegal content online, such as hate speech, terrorist content, counterfeit products or child sexual abuse material, 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 of the DSA, such as independence from any online platform or specific expertise. Pursuant to Article 22(8) of the DSA, the European Commission, following consultation with the European Board for Digital Services, shall, where necessary, issue guidelines to assist providers of online platforms and Digital Services Coordinators in applying the criteria for the designation of trusted flaggers. These guidelines are currently under preparation, with adoption anticipated in December 2025.

Trusted Flaggers in 2024

In 2024, HAKOM did not certify any trusted flaggers, as there was no legal basis for such certification during the reporting period. As outlined in earlier sections of this report, the Act on the Implementation of the Digital Services Act was adopted in 2025 and provides for the adoption of a by-law specifying the criteria and procedure for granting, suspending, or revoking the status of a trusted flagger. HAKOM is currently in the process of drafting this by-law and aims to take into account, to the greatest extent possible, the guidelines of the European Commission, which are also in their final stage of preparation. In the meantime, HAKOM was contacted by one potential trusted flagger, with whom an initial meeting was held; regular communication with this entity is ongoing.

6. Vetted researchers (Article 40 of the DSA)

Introduction

Vetted researchers are researchers that have the right to access non-public data for their research on systemic risks or measures to mitigate them at the Very Large Online Platforms and Search Engines. Systemic risks are risks that can inflict serious harm to society or the economy at large, for example the widespread dissemination of illegal content or election interference. In order to gain access to relevant data, the DSC of the Member State of establishment of the specific Very Large Online Platform or Search Engines can grant the status to a researcher when the researcher has demonstrated to meet the conditions laid down in Article 40 of the DSA. Very large online platforms and search engines are required to give researchers access to that data to the researchers that have been granted the status of vetted researcher.

Status granted to vetted researchers in 2024

Pending the entry into force of the Delegated Act provided for in Article 40(13) of the DSA, and considering that no Very Large Online Platforms (VLOPs) or Very Large Online Search Engines (VLOSEs) are established in Croatia, HAKOM has not granted the status of vetted researcher to any entity, nor did it carry out any activities related to the granting of data access to vetted researchers. Nevertheless, HAKOM held preliminary discussions on this topic with academic representatives and civil society organisations expressing interest in potential future research cooperation under the DSA framework.

7. Enforcement and (inter)national activities

Introduction

In 2024, HAKOM engaged in a variety of national and international activities — both formal and informal—aimed at fostering compliance, enhancing cooperation among stakeholders, and ensuring the effective implementation of the DSA. These activities complemented enforcement efforts and contributed to raising awareness, building capacity, and promoting transparency in the digital ecosystem, as described in more detail below.

Enforcement activities in 2024

- HAKOM started processing onboarding applications for the DSA Transparency Database.
- HAKOM started processing received complaints.
- HAKOM actively contributed to safeguarding the integrity of the presidential elections held in December 2024/January 2025 through coordination with platforms and civil society organisations. A report on this activity is included under the section titled *Protection of Electoral Integrity*.

National Activities

At the national level, HAKOM participated in a wide range of stakeholder engagements, consultations, and thematic events focused on supporting the DSA's implementation and promoting safe and accountable digital services. Key areas of activity included:

- Addressing disinformation and hate speech through expert discussions, roundtables, and panel events;
- Participation in inter-agency and parliamentary meetings dealing with issues such as media literacy, gender equality, and user safety;
- Communication with the general public through media appearances, interviews, and participation in public dialogue on platform accountability and fact-checking culture;
- Co-organization of the event *“(R)evolution of Digital Services: How European Rules Are Shaping the (Online) World”*, in cooperation with the European Commission Representation in Croatia, focusing on the impact of the Digital Services Act on the Croatian, European, and global digital markets.

In addition, HAKOM published educational resources including the Keys to a Safer Internet brochure, which was distributed to all fifth-grade pupils in Croatia as part of its outreach to young internet users.

International Activities

At the EU and international level, HAKOM actively contributed to the implementation and coordinated enforcement of the DSA through participation in numerous expert workshops, stakeholder consultations and high-level regulatory forums.

Key areas of engagement included:

- Cooperation with the European Commission and other Digital Services Coordinators on onboarding processes, transparency obligations, and systemic risk assessments related to very large online platforms (VLOPs);
- Participation in stakeholder consultations on the development of DSA guidelines, notably those concerning the protection of minors and data access for research purposes;
- Attendance at cross-sectoral events addressing broader regulatory challenges, including cybersecurity, digital platform accountability, and the evolving role of national regulators in the digital era;
- Contribution to international capacity-building efforts through forums such as BEREC³, IRG⁴, and expert events organised under the Hungarian Presidency of the Council of the EU;

³ The Body of European Regulators for Electronic Communications, <https://www.berec.europa.eu/en>

⁴ The Independent Regulators Group, <https://www.irg.eu/>

- Participation in the Safer Internet Forum⁵, contributing to discussions on the protection of children and young people in the digital environment;
- Participation in specialised training on the implementation of the DSA, organised by the European Commission;
- Participation in a specialized training on the Digital Services Act, organized by Cullen International, aimed at strengthening institutional knowledge and practical understanding of the new regulatory framework.

Electoral Integrity Activities in 2024

In 2024, HAKOM undertook a series of preventive and supervisory activities to support the integrity of both the European Parliament and presidential elections in the digital environment.

At the **national level**, HAKOM was appointed a permanent member of the National Cooperation Network, established to enhance coordination among key stakeholders during electoral processes. In this capacity, HAKOM participated in a coordination meeting on 14 March 2024, organised by the Ministry of Justice and Public Administration⁶. Topics included the protection of electoral infrastructure, countering cyber and hybrid threats, and mitigating disinformation.

During both elections, HAKOM maintained communication protocols with platforms, civil society organisations, and national authorities. In cooperation with the State Electoral Commission (DIP), measures were implemented to prioritise official information in search results, regulate political advertising, and ensure timely responses to reported content.

HAKOM ensured operational readiness during the election periods and acted on several notifications regarding potentially unlawful or harmful content. No systemic risks were identified, and the platforms responded in line with their obligations under the DSA.

At the **EU level**, HAKOM actively contributed to the European Board for Digital Services, participating in working groups on electoral integrity and the Commission's ad hoc election task force. These efforts enabled the exchange of national insights and supported coordinated EU-wide responses.

Further details on election-related activities are provided in **Annex I** to this report.

⁵ <https://digital-strategy.ec.europa.eu/en/events/safer-internet-forum-2024>

⁶ Since June 2024 – Ministry of Justice, Public Administration and Digital Transformation

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 meetings⁷. 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.

HAKOM attended all Board meetings. In addition, experts of HAKOM have participated in all Working Groups⁸ that have been established under the Board:

- Working Group 1 – Horizontal and legal issues
- Working Group 2 – Working together
- Working Group 3 – Content moderation and data access
- Working Group 4 – Integrity of the information space
- Working Group 5 – Consumers and online marketplaces

⁷ <https://digital-strategy.ec.europa.eu/en/policies/dsa-board> - European Board for Digital Services

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

- Working Group 6 – Protection of minors
- Working Group 7 – Orders and criminal issues
- Working Group 8 – IT Issues

Annex I – Report on Activities Related to the European Parliament and Presidential Elections

Introduction

In 2024, Croatia held elections for the European Parliament (June) and the President of the Republic (December 2024 – January 2025). As the designated Digital Services Coordinator (DSC), HAKOM engaged in a range of coordinated activities in line with the Digital Services Act (DSA) to help preserve the integrity of these democratic processes in the digital environment.

Institutional Coordination

Prior to the elections, HAKOM was appointed a permanent member of the **National Cooperation Network**, a coordination mechanism established by the Ministry of Justice and Public Administration. The Network gathers key institutions involved in electoral oversight, cybersecurity, and public communication.

On 14 March 2024, HAKOM participated in a meeting of the Network, where the following topics were discussed:

- Exchange of experiences among network members,
- Technical and organisational measures to manage electoral security risks,
- Protection of electoral infrastructure and resilience to hybrid and cyber threats,
- Measures to counter disinformation and fake news.

European Parliament Elections (June 2024)

HAKOM ensured the operational readiness of its team in coordination with the State Electoral Commission (SEC) and the Ministry of Justice, Public Administration and Digital Transformation. It maintained open lines of communication with online platforms and acted on received notifications related to potentially illegal content.

At the **EU level**, HAKOM:

- Participated in the Commission's ad hoc election group (March–June 2024),
- Took part in Working Group 4 on Information Integrity under the European Board for Digital Services,
- Contributed national insights to the Board's *Report on the European Elections – Digital Services Act and Code of Practice on Disinformation*⁹, by regularly providing information on the national context and measures implemented in Croatia.
- In September 2024, HAKOM also participated in the FOCUS Group organised by Democracy Reporting International, aimed at facilitating the exchange of experiences among EU Member States and non-governmental organisations.

⁹ <https://digital-strategy.ec.europa.eu/en/library/european-board-digital-services-publishes-post-election-report-eu-elections>

No major incidents or systemic risks were identified during this electoral cycle.

Presidential Elections (December 2024 – January 2025)

In coordination with the European Commission, State Electoral Commission (SEC), civil society, and platforms (including VLOPs), HAKOM undertook a set of preventive measures to address potential digital risks to the presidential elections.

Preparatory activities included:

- A high-level roundtable held on 11 November 2024, with representatives of the Commission, platforms, SEC, and civil society (GONG, Faktograf),
- Bilateral consultations with platforms to establish communication protocols and content moderation mechanisms,
- Agreements with platforms to prioritise verified electoral information and restrict political advertising during electoral silence periods,
- Contacting presidential candidates to inform them about the possibilities of additional protection of their social media accounts against potential abuse, manipulation and disinformation, with platforms committing to devote increased attention to these accounts.

During the election period:

- HAKOM processed six alerts: four from civil society (GONG), one from SEC, and one from an individual citizen. Reports were mostly addressed directly to the platforms, while HAKOM, in its coordinating role, was informed of them in order to ensure oversight of the actions taken and timely monitoring of the situation.
- All complaints were addressed by platforms in a timely and adequate manner,
- No systemic risks or coordinated disinformation campaigns were identified; however, media reports pointed to the use of a network of fake profiles by one presidential candidate. Although assessed as an isolated case, the incident further demonstrated the importance of continuous monitoring and reinforced cooperation among digital actors, competent authorities, and civil society organisations.
- During the campaign period, the Centre for Information Resilience (CIR) published a report alleging potential pro-Russian digital influence on the electoral process in Croatia. Independent assessments carried out by online platforms, however, did not corroborate the claims put forward in the report. Furthermore, domestic civil society organisations publicly criticised the report for methodological shortcomings and a range of internal inconsistencies, raising concerns regarding its objectivity and credibility. HAKOM closely monitored these developments and took into account both public reactions and platform responses within the broader framework of electoral risk assessment under the Digital Services Act.

- HAKOM also monitored media and stakeholder reports concerning the use of generative AI tools but identified no significant use during this cycle.

Conclusion

The 2024/2025 presidential elections were conducted in the digital environment without any major incidents or security threats. Online platforms acted fully in accordance with the provisions of the Digital Services Act. Systematic planning, established communication mechanisms, and coordination among all stakeholders – including HAKOM, the State Electoral Commission (SEC), platforms, and civil society organisations – contributed to the transparency, credibility, and resilience of the electoral process against digital threats.

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ZAGREB, AUGUST 2025.