

ANNUAL ACTIVITY REPORT

PURSUANT TO
ARTICLE 55 OF THE
DIGITAL SERVICES ACT

01 JANUARY 2025 –
31 DECEMBER 2025



CROATIAN REGULATORY AUTHORITY
FOR NETWORK INDUSTRIES

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1. Introduction

General introduction DSA¹

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 DSA has fully applied since 17 February 2024.

The Digital Services Coordinator of the Republic of Croatia is the **Croatian Regulatory Authority for Network Industries** (HAKOM). HAKOM initially performed the role of coordinator on the basis of a Decision of the Government of the Republic of Croatia (Official Gazette No. 19/24²), and, as of 17 April 2025, on the basis of the Act on the Implementation of Regulation (EU) 2022/2065 (Official Gazette No. 67/25; hereinafter: the Implementing Act), upon the entry into force of which the aforementioned Decision ceased to have effect.

The Implementing Act designates the **national authorities** competent to **issue orders** to act against illegal content (Article 9 DSA) and orders to provide information (Article 10 DSA), as follows:

- the **State Attorney’s Office** and the **Ministry of the Interior**, in respect of illegal content constituting a criminal offence or a misdemeanour;
- the **Croatian Personal Data Protection Agency**, in respect of illegal content constituting an infringement of the rules governing the protection of personal data;
- the **Customs Administration of the Ministry of Finance**, in respect of illegal content constituting an infringement of intellectual property rights;

¹ REGULATION (EU) 2022/2065 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act)

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R2065>

² https://narodne-novine.nn.hr/clanci/sluzbeni/2024_02_19_306.html

- the **State Inspectorate**, in respect of illegal content constituting an infringement of the rules falling within the remit of the inspections of the State Inspectorate, in accordance with the powers conferred by special legislation;
- the **Ministry of Health**, in respect of illegal content constituting an infringement in the fields of health, medicinal products, medical devices and biomedicine, in accordance with the powers conferred by special legislation;
- the **Agency for Electronic Media**, in respect of illegal content constituting an infringement in the field of electronic media, in accordance with the powers conferred by special legislation;
- other authorities, in accordance with the powers conferred on them by special legislation governing their remit.

Those national competent authorities, each acting within the scope of its statutory powers and remit, are competent not only to issue the above-mentioned orders, but also to enforce the provisions of the DSA relating to online interface design and organisation (Article 25), advertising on online platforms (Article 26), traceability of traders (Article 30), compliance by design (Article 31), and the right to information (Article 32). Enforcement activities are carried out through the exercise of the powers laid down in the relevant special legislation.

The Croatian Personal Data Protection Agency is the competent authority for the enforcement of Articles 27 (transparency of recommender systems) and 28 (online protection of minors) of the DSA.

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 this report with the European Commission and the European Board for Digital Services.

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.

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 2025

During 2025, HAKOM received **52 complaints** at national level, of which 7 were submitted against providers established in the Republic of Croatia, while the remaining 45 concerned very large online platforms (VLOPs) and very large online search engines (VLOSEs).

Following the preliminary assessment of the cases received, no circumstances were identified that would indicate an infringement of the obligations laid down in the Digital Services Act (DSA) by providers of intermediary services. Accordingly, none of the complaints lodged against national providers resulted in the opening of formal proceedings, and complaints concerning VLOPs/VLOSEs were not, in principle, transmitted to the Digital Services Coordinators of the Member States in which those providers are established. Exceptionally, **one complaint was transmitted to the competent Digital Services Coordinator** of the Kingdom of the Netherlands due to indications of a possible infringement of Articles 17 and 20 DSA.

In the majority of cases, it was found that the complaints essentially reflected dissatisfaction with an individual platform decision in a specific case (e.g. content removal, restriction of reach, or account suspension), without any elements indicating an infringement of the DSA being identified. For example, the user had not previously contacted the platform in order to challenge the decision, the platform had provided a statement of reasons for the content moderation action, or the available internal complaint-handling mechanisms had not been used. In a smaller number of cases, users had incorrectly considered their submissions to constitute complaints falling within the scope of the DSA (e.g. submissions relating to monetary transactions between a recipient of the service and a trader, or complaints directed against entities not subject to obligations under the DSA).

HAKOM did not receive any complaints from other Digital Services Coordinators concerning providers established in the Republic of Croatia.

Complaints that led to formal investigations in 2025

In 2025, HAKOM did not initiate any formal proceedings on the basis of complaints received pursuant to Article 53 DSA, as no circumstances were identified in the cases received that would indicate an infringement of obligations under the 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.

Orders in 2025

As already noted in the introduction to this report, the national authorities competent to issue orders to act against illegal content (Article 9 DSA) and orders to provide information (Article 10 DSA) were designated by Article 6 of the Implementing Act, which entered into force in April 2025.

During 2025, HAKOM, in the context of coordination at national level, maintained continuous cooperation with the national competent authorities, including through **several bilateral and multilateral meetings** at which the substance and formal requirements of orders under Articles 9 and 10 DSA, the practical challenges of their implementation, and the operational channels for the submission and follow-up of orders/notices used by individual very large online platforms and very large online search engines (VLOPs/VLOSEs) were discussed.

During the reporting period, the State Attorney's Office of the Republic of Croatia, the Croatian Personal Data Protection Agency, the Customs Administration of the Ministry of Finance, the Agency for Electronic Media and the Ministry of Health did not issue any orders under Articles 9 and 10 DSA.

The Ministry of the Interior, Criminal Police Directorate, submitted **two** orders to provide information under Article 10 DSA to Meta: (i) in relation to Facebook, concerning the misdemeanour referred to in Article 17 of the Minor Offences against Public Order and Peace Act, and (ii) in relation to WhatsApp, concerning the criminal offences of "Unauthorised Access" (Article 266(1) of the Criminal Code) and "Exploitation of Children for Pornography"

(Article 163(1) of the Criminal Code). Meta rejected both requests on the grounds that a request for mutual legal assistance needed to be submitted.

In 2025, the **State Inspectorate** submitted **four** orders under Articles 9 and 10 DSA. The Market Inspection submitted one order to act against illegal content advertised on Facebook, covering two Facebook profiles and relating to three advertisements that gave rise to infringements of the Trade Act, the Electronic Commerce Act and the Consumer Protection Act. The platform complied in full with the order, and the illegal content was removed. The Tourism Inspection submitted two orders under Article 9 DSA addressed to Booking.com and Airbnb.com for the removal of illegal content relating to the advertising of unregistered catering activities and the unregistered provision of accommodation services, respectively. Booking.com complied with the order and removed the advertisement concerned, whereas Airbnb.com had not complied with the order by the end of the reporting period. The Tourism Inspection also submitted one order to provide information under Article 10 DSA to Airbnb.com, requesting information on invoices issued in 2024 for the rental of property; by the end of the reporting period, the platform had not complied with the order.

Other actions and activities of the national competent authorities in 2025 not covered by orders under Articles 9 and 10 DSA, including complaints received, voluntary requests for the provision of data, and actions taken on the basis of other DSA provisions, are presented later in the report under the heading “Other activities of the national competent authorities in 2025”.

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 disputes and are also required to cooperate with the procedures of certified out-of-court 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 2025

In 2025, HAKOM did not certify any out-of-court dispute settlement bodies.

The Implementing Act provides for the adoption of an ordinance laying down the criteria and procedure for the certification of out-of-court dispute settlement bodies. Pursuant to Article 21 DSA, certification is carried out upon request; accordingly, the existence of a certified body in a given Member State depends on whether there are entities that apply for certification and satisfy the prescribed conditions. By the end of the reporting period, the ordinance had

not yet been adopted and, given that no applications for certification were received in 2025 and no interest was expressed by potential bodies in initiating the certification procedure, there was no need to conduct certification procedures during the reporting period. Preparatory activities for the adoption of the relevant secondary legislation continued as part of the regular implementation activities.

Irrespective of the above, pursuant to Article 21 DSA, users may refer their dispute to any out-of-court dispute settlement body certified in any Member State of the European Union, taking into account its area of expertise and the languages in which it operates. The European Commission publishes and updates the list³ of certified bodies and, according to the publicly available list as at 31 December 2025, a total of nine bodies had been certified in the EU. Where appropriate in light of the subject matter of the submission, HAKOM informed users of that possibility and referred them to the relevant list.

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 in the application of these criteria. These guidelines are currently under preparation, with adoption anticipated during 2026.

Trusted flaggers in 2025

During 2025, HAKOM did not award trusted flagger status, nor did it receive any formal application for the award of such status during the reporting period.

The Implementing Act provides for the adoption of an ordinance laying down the criteria and procedure for awarding, suspending or revoking trusted flagger status. Although the ordinance had not been adopted by the end of the reporting period, preparatory activities were carried out during 2025, including meetings with interested stakeholders and the drafting of the text. In preparing the draft, HAKOM sought to align the national approach as closely as possible with the approach at EU level, taking into account the above-mentioned European Commission guidelines (under preparation during 2025) and the best practices

³ <https://digital-strategy.ec.europa.eu/hr/policies/dsa-out-court-dispute-settlement>

discussed within the working groups of the European Board for Digital Services, in order to avoid the need to amend the ordinance immediately after its adoption. The draft ordinance is planned to be submitted for public consultation in March 2026.

At the same time, HAKOM carried out **information and awareness-raising activities** regarding the trusted flagger mechanism, including through presentations delivered to competent authorities and civil society organisations.

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 2025

In 2025, key developments took place with regard to the implementation of Article 40 DSA. The European Commission adopted Commission Delegated Regulation (EU) 2025/2050⁴ of 1 July 2025 supplementing Regulation (EU) 2022/2065 of the European Parliament and of the Council by laying down the technical conditions and procedures under which providers of very large online platforms and of very large online search engines are to share data with vetted researchers. In addition, the DSA data access portal⁵ was launched as a central point for the submission of applications and for operational communication concerning data access.

Under that framework, an application may be submitted either to the Digital Services Coordinator (DSC) of the Member State of establishment of the VLOP/VLOSE whose data is sought, or to the DSC of the Member State in which the research organisation with which the researcher is affiliated is established; the latter DSC carries out the initial assessment and forwards the application, together with its assessment, to the DSC of establishment, which takes the final decision.

HAKOM **informed the public**⁶ about those developments and about the application procedure, and **established a contact point** to support researchers from the Republic of Croatia in using the DSA Data Access Portal.

⁴ https://eur-lex.europa.eu/legal-content/HR/TXT/PDF/?uri=OJ:L_202502050

⁵ <https://data-access.dsa.ec.europa.eu/home>

⁶ <https://www.hakom.hr/hr/provjereni-istrazivaci-i-pristup-podacima/12313>

During 2025, HAKOM did not award vetted researcher status and did not conduct any procedures for granting data access in its capacity as the DSC of the Member State of establishment, as no VLOP/VLOSE is established in the Republic of Croatia.

Nevertheless, HAKOM **maintained regular contacts** and **exchanged relevant information** with representatives of the academic community and with civil society organisations that had expressed an interest in potential future cooperation in the area of research into systemic risks under the DSA.

7. Enforcement and (inter)national activities

Introduction

In 2025, HAKOM participated in a range of national and international activities — both formal and informal — aimed at fostering compliance, strengthening cooperation among stakeholders, and ensuring the effective implementation of the Digital Services Act (DSA). These activities complemented enforcement activities and contributed to raising awareness, building capacity, and promoting transparency in the digital ecosystem. They also included the day-to-day handling of queries, coordination activities, and the preparation of materials for work at national and EU level. In addition, during 2025, HAKOM responded to thematic questionnaires and requests for the provision of information received from competent authorities and the European Commission, and provided DSA-relevant data for the purposes of the annual reports of the Ombudsperson for Children and the Ombudsperson.

Enforcement activities in 2025

In 2025, HAKOM carried out the Digital Services Coordinator's implementation activities, encompassing the operational handling of submissions and the establishment of processes necessary for the implementation of the DSA at national level. This included the processing of applications for registration in the DSA Transparency Database, the receipt and handling of user complaints, and the preliminary assessment of allegations and available information in order to determine whether there were grounds to suspect an infringement of obligations under the DSA by providers of intermediary services, while directing complainants to the appropriate redress mechanisms where no infringement was identified or where the matter did not fall within the scope of the DSA.

At the same time, activities aimed at making implementation operational were also carried out (e.g. the establishment of tools and procedures, the preparation of guidance for obliged entities, coordination with national competent authorities, and communication protocols with relevant stakeholders). These activities are described in greater detail below in the chapters "National Activities" and "Other Activities of National Competent Authorities in 2025".

National Activities

Regulatory framework and implementation coordination

In 2025, HAKOM, in its capacity as the Digital Services Coordinator, **actively participated in the adoption of the Implementing Act**, including by providing expert opinions in the course of the legislative drafting process. In the context of its role as DSC, HAKOM also took part in **related legislative activities** concerning the preparation of the national implementation framework for the Regulation on the transparency and targeting of political advertising⁷, in particular as regards providers of intermediary services.

In order to ensure the effective performance of its tasks under the DSA, HAKOM established, in organisational terms, the **Digital Services Sector** in 2025. At the same time, preparatory and coordination activities were carried out with the authorities referred to in Article 6 of the Implementing Act through bilateral and multilateral meetings, as well as cooperation with other institutions. In the field of the protection of intellectual property rights, HAKOM secured formal participation in the **Coordination Committee for the Enforcement of Intellectual Property Rights** (KOPPPIV) and, through several meetings held within that framework, contributed to the coordination of action and the exchange of information relevant to combating infringements of intellectual property rights in the digital environment. In addition to its work within the institutional framework, HAKOM also engaged in informal operational formats with relevant stakeholders, including operators, aimed at combating digital piracy.

Depending on the area of competence and expertise concerned, HAKOM involved the national competent authorities in the relevant working groups of the European Board for Digital Services. In addition, HAKOM held **regular bilateral meetings with the Representation of the European Commission in the Republic of Croatia** for the purpose of exchanging information and coordinating activities relating to the implementation of the DSA.

Operational tools and support for providers (e-Provider DSA)

In 2025, HAKOM established and made operational the e-Provider DSA system, which serves as a database of providers of intermediary services and as a channel for the submission of notifications on the provision of intermediary services pursuant to the Implementing Act. Following the publication, on 29 July 2025, of information on the manner in which notifications were to be submitted, the statutory three-month period for submitting notifications began to run (until 29 October 2025), in respect of which HAKOM additionally informed and reminded obliged entities in advance of the expiry of the deadline. For the purposes of operational implementation, **user guidance and support** via a contact address (**helpdesk**) were provided, and the system enabled communication with providers and, where necessary, the exchange of relevant information with the European Commission and other competent authorities in accordance with the DSA and the Implementing Act. By the end of the

⁷ REGULATION (EU) 2024/900 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 March 2024 on the transparency and targeting of political advertising, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202400900

reporting period (31 December 2025), **70** providers of intermediary services had been recorded in the e-Provider DSA system.

In the context of implementation and support to obliged entities, HAKOM provided continuous operational and expert support to providers of intermediary services and, during 2025, responded to a total of **42 enquiries** concerning the application of the DSA and compliance with the obligations laid down in the Implementing Act.

In addition to communication with providers, HAKOM responded to **13 media queries**, including queries from specialised media concerning digital piracy. These queries covered a range of DSA-relevant topics, in particular the integrity of the information space (disinformation and suspected coordinated inauthentic behaviour), AI-generated content (e.g. deepfake recordings), and issues relating to the application of the DSA to individual service providers. HAKOM also participated in **one live media appearance** on the DSA and electoral integrity, and **published DSA-relevant information on its website** in a timely manner.

Protection of children and raising the level of digital safety

As in previous years, HAKOM undertook a number of activities in 2025 aimed at protecting children and raising the level of digital safety, including:

- the preparation and publication of the **brochure** "[Ključevi sigurnog interneta](#)" (Keys to a Safe Internet), which was distributed to fifth-grade pupils in primary schools throughout Croatia. The brochure contains practical and useful advice on online safety, privacy and personal data protection, appropriate conduct and the responsible use of social media, and forms part of HAKOM's programme for informing children and parents, which has been implemented since 2016 in cooperation with the Ministry of Science, Education and Youth;
- the development of the "Ključevi sigurnog interneta" **webinars**, covering five different thematic areas, including online safety, personal data protection, information on digital footprints and artificial intelligence, as well as information on the new rules of the digital world. These webinars were developed in cooperation with experts from different fields and constitute a useful tool for parents to raise awareness of the benefits and challenges of the digital environment, as well as for older users who may find it more difficult to navigate digital technologies; marking **Safer Internet Day** through the co-organisation of the conference "Potraga za boljim internetom" (In Search of a Better Internet) in cooperation with CARNET, the Centre for Safer Internet and the association "Suradnici u učenju";
- the continuous implementation, as part of the child online protection project, of **educational programmes** for primary school pupils and their parents, with the aim of providing the necessary information on responsible behaviour in the use of social media at the stage when children begin to use such services independently and without constant adult supervision;
- the establishment of the **Advisory Mechanism** for the Protection of Children in the Digital Environment, as a platform for the exchange of information and the launching of coordinated initiatives in the area of child protection in the digital environment through cooperation with civil society organisations, operators, competent public authorities and other institutions;

- the upgrade of the **Privacy Calculator** application, which enables users to assess potential risks to their privacy when using the internet and sharing personal data.

In addition, in 2025 HAKOM expressed interest in participating in the BIK⁸ Advisory Board.

Activities relating to public communication and outreach to users

During the reporting period, an initial discussion was also held with a digital content creator (influencer) to exchange views on possible future formats for informing users, with no specific communication activities being carried out in 2025.

Activities relating to electoral integrity in 2025

During 2025, HAKOM continued to carry out preventive and supervisory activities aimed at safeguarding the integrity of the second round of the **presidential elections** and the **local elections** in the digital environment, including coordination with the State Electoral Commission, platforms (including VLOPs/VLOSEs) and civil society organisations.

Ahead of the local elections held on 18 May 2025, HAKOM, in its capacity as DSC and in cooperation with the State Electoral Commission, organised a **round table** on 9 April 2025 on mitigating the risk of disinformation, with the participation of representatives of Google, Meta, TikTok and X, the European Commission, and civil society organisations (Gong⁹, Faktograf¹⁰ and ADMO¹¹). The discussion focused on identifying risks of information manipulation and on confirming and strengthening communication protocols and rapid-response mechanisms, including the use of direct communication channels in cases of suspected coordinated dissemination of disinformation.

During both electoral processes, HAKOM maintained communication protocols with platforms, civil society organisations and national authorities. In cooperation with the State Electoral Commission, measures were implemented to give prominence to official information in search results, regulate political advertising, and ensure a timely response to reported content.

During the electoral periods, HAKOM ensured operational readiness and handled several reports relating to potentially illegal or harmful content, including by **organising a 24/7 duty arrangement** during the election silence period and on election day. No systemic risks were identified, and the platforms acted in accordance with their obligations under the Digital Services Act (DSA).

⁸ *Better Internet for Kids*

⁹ <https://gong.hr/>

¹⁰ <https://faktograf.hr/>

¹¹ Adria Digital Media Observatory, <https://admohub.eu/hr/>

Other activities of national competent authorities in 2025

In addition to action taken by means of orders under Articles 9 and 10 DSA, certain national competent authorities reported other activities relevant to the implementation of the DSA and related action vis-à-vis service providers.

The Ministry of the Interior, Criminal Police Directorate, in the context of criminal investigations in the Republic of Croatia, sent **719 requests** to foreign online service providers for the disclosure of basic subscriber information concerning users. Those requests were based on voluntary cooperation between service providers and the police (outside the framework of orders under Article 10 DSA).

The Croatian Personal Data Protection Agency received **38 complaints** from data subjects relating to the blocking of Facebook and Instagram accounts (Meta) due to alleged non-compliance with the platforms' terms of service and, following its analysis, informed complainants of the possibility of using the out-of-court dispute settlement mechanisms provided for under the DSA, as well as of other available means of redress.

For the purpose of verifying product compliance with Regulation (EC) No 1223/2009 on cosmetic products, the **State Inspectorate**, Sanitary Inspection, sent **one** request to Amazon on the basis of **Article 32** DSA (right to information), concerning a product that did not contain information on the responsible person for the EU market. Upon receipt of the request, Amazon removed the product concerned from sale.

The Agency for Electronic Media continued its work on the project to establish a national network of **fact-checkers** as an important tool for reducing systemic risks and strengthening resilience to disinformation. Particular emphasis was placed on cases relating to the **protection of minors** and the **combating of hate speech** and incitement to hatred and violence. In cooperation with HAKOM and other stakeholders involved in implementation, it carried out activities relating to the establishment of a complaint-handling system, staff training, and the strengthening of users' media literacy, as well as the development of technical protocols for the exchange of information between HAKOM and the Agency for Electronic Media in cases where a complaint concerns audiovisual content.

International activities***Cooperation and coordination at EU and Member State level***

As part of cross-border cooperation, HAKOM maintained bilateral contacts with several other Digital Services Coordinators (e.g. Ireland, Czechia, Romania, Slovakia, Italy and Greece) and regularly exchanged information through the AGORA system, with a view to aligning approaches and sharing operational experience in the implementation of the DSA. A thematic workshop was also held with the Slovenian Digital Services Coordinator.

Cooperation with platforms and operational alignment of actions

During 2025, several bilateral meetings were held with very large online platforms (VLOPs), namely **Meta** and **TikTok**. In addition to topics related to electoral integrity, the discussions also covered operational channels for reporting and removing illegal content (for the purposes of competent authorities), as well as the challenges encountered by platforms in practice, in particular as regards content moderation and the linguistic and contextual specificities of individual Member States that may affect the effectiveness of the measures implemented.

Dialogue with civil society and the integrity of the information space

HAKOM continued its cooperation with civil society organisations through participation in and contributions to discussions on topics relating to disinformation, the protection of civic discourse, and the integrity of the information space. In that context, HAKOM representatives participated in the **DSA Civil Society Roundtable** in Brussels in November 2025, co-organised by the DSA Civil Society Coordination Group, and took an active part in the **DISINFO Lab 2025** event, including by giving a presentation on HAKOM's experience in its role as Digital Services Coordinator.

HAKOM shared with civil society organisations the invitation and information concerning the webinar organised by TikTok ("TikTok Research Tools (Research API)", intended for researchers and civil society organisations.

Participation in conferences, panels and expert discussions

HAKOM participated in a panel at the international conference of the **ADMO project** and in a panel organised by the Croatian Chamber of Economy as part of the round table "**Borba protiv piratstva u digitalnom dobu**" (Combating Piracy in the Digital Age). In the area of capacity-building and knowledge exchange, HAKOM representatives also took part in relevant training sessions and workshops at EU level, including the European Commission's week-long **training** on DSA enforcement, a **thematic workshop** on the guidelines on the protection of minors, and a **workshop** organised as part of an EU study on **online advertising**. In addition, HAKOM participated in expert discussions with relevant stakeholders in academic and professional settings on platform regulation and the implementation challenges of the DSA.

European Board for Digital Services

The European Board for Digital Services¹² (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.

¹² <https://digital-strategy.ec.europa.eu/hr/policies/dsa-board>

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 2025, the European Board for Digital Services held a total of 6 meetings and 3 ad hoc meetings. 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 participated in all **nine meetings of the Board**. In addition, HAKOM experts actively participated in all Working Groups¹³ established within the Board, attending a **total of 89 meetings**:

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

Where appropriate, HAKOM also involved representatives of the national competent authorities in the work of those Working Groups, namely: representatives of the State Electoral Commission in the work of Working Group 4; representatives of the State Inspectorate in the work of Working Group 5; representatives of the Ministry of Justice, Public Administration and Digital Transformation and the Agency for Electronic Media in the work of Working Group 6; and representatives of the Ministry of the Interior and the State Attorney's Office of the Republic of Croatia in the work of Working Group 7.

¹³ <https://digital-strategy.ec.europa.eu/hr/policies/dsa-board-working-groups>

8. Conclusions

During 2025, HAKOM, in its capacity as the Digital Services Coordinator, made significant progress in operationalising the implementation of the DSA at national level. The e-Provider DSA system was established for the submission of notifications on the provision of intermediary services, action was taken on user complaints received, and coordination mechanisms were developed and maintained with national competent authorities, the European Commission, other DSCs and relevant stakeholders. Cooperation in the field of intellectual property rights was further strengthened through activities within the Coordination Committee for the Enforcement of Intellectual Property Rights (KOPPPIV). Active participation in the work of the European Board for Digital Services and its Working Groups contributed to the alignment of practice, the exchange of experience, and the enhancement of cooperation and coordination with other Coordinators and the European Commission with a view to ensuring the consistent and effective implementation of the Regulation.

In 2026, HAKOM will prioritise activities aimed at the adoption and implementation of the secondary legislation provided for in the Implementing Act, following which the first awards of trusted flagger status are also expected. In addition to the existing established forms of cooperation and coordination, further activities will continue with a view to additional mapping of providers of intermediary services in order to achieve more comprehensive market coverage. Particular attention will be given to strengthening dialogue with civil society organisations on the implementation of the DSA. At the same time, a growing level of public interest in the DSA and users' rights is already evident: in the first two months of 2026, 26 complaints were received, representing around half of the total number of complaints received in 2025. That trend confirms the importance of continuing information and outreach activities directed at users and stakeholders.

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ZAGREB, MARCH 2026.