

(English version)

**Question for written answer E-002238/25
to the Commission
Christine Anderson (ESN)
(4 June 2025)**

Subject: Evaluation of Community Notes as a decentralised mitigation measure under the DSA — follow up to E-000853/2025

In its response to Question E-000853/2025 ⁽¹⁾, the Commission acknowledged that both centralised fact-checking and decentralised initiatives such as Community Notes are evaluated under the same standards of reasonableness, proportionality, effectiveness and respect for fundamental rights, including freedom of expression, as stipulated by the Digital Services Act ⁽²⁾ (DSA).

1. Can the Commission provide comparative data on the average response times of EU-supported centralised fact-checking entities versus decentralised systems like Community Notes in addressing misinformation?
2. Has it assessed the cost-effectiveness of decentralised approaches like Community Notes compared to traditional, EU-funded fact-checking mechanisms?
3. Can it clarify how it ensures that the evaluation of such decentralised initiatives adequately accounts for their scalability, responsiveness and potential to enhance democratic discourse without infringing on freedom of expression?

Submitted: 4.6.2025

**Answer given by Executive Vice-President Virkkunen on behalf of the European Commission
(24 July 2025)**

The Digital Services Act (DSA) ⁽¹⁾ requires as part of the enhanced due diligence obligations that providers of Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) diligently assess the systemic risks stemming for the design, functioning and use made of their services and related systems (including algorithmic systems) and put in place effective measures to mitigate the identified risks.

Such assessment must cover and be tailored to risks listed in the DSA, including the dissemination of illegal content, any actual or foreseeable negative effects on civic discourse and electoral processes, and effects on the exercise of fundamental rights.

This evaluation standard applies to both professional fact-checking and community-based initiatives such as community notes if the relevant provider of the VLOP or VLOSE has chosen to use such mitigation measures.

The cost-effectiveness of community-based initiatives, such as community notes, to address misinformation varies greatly, and depends on how the specific system is utilised on a particular service.

The obligation to put in place effective and tailored-made mitigation measures is applicable to providers VLOPs and VLOSEs. The Commission is competent to supervise the enforcement and compliance of the DSA by providers, therefore, it assesses whether the risk assessment has been diligently conducted and whether effective and tailored-made mitigation measures have been put in place by the relevant provider to tackle the identified risks in compliance with the DSA.

The Commission is aware that the effectiveness of Community Notes is subject to several ongoing research projects by third parties and is closely following the latest insights on this topic.

¹ https://www.europarl.europa.eu/doceo/document/E-10-2025-000853_EN.html.

² Regulation (EU) 2022/2065 of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), OJ L 277, 27.10.2022, p. 1., ELI: <http://data.europa.eu/eli/reg/2022/2065/oj>.

⁽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).