

EN

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Answer given by Executive Vice-President Virkkunen
on behalf of the European Commission
(1.10.2026)

The designation of ChatGPT as a very large online search engine (VLOSE) does not include features which do not, on their own, based on their technical functionalities, fall within the definition of an online search engine within the meaning of the Digital Services Act (DSA)¹.

On 21 April 2026, the provider of ChatGPT indicated that ‘ChatGPT search had approximately 159.1 million average monthly active recipients in the European Union’, without specifying the methodology used to calculate the number of average monthly active recipients (AMAR) of the online search feature of ChatGPT in the EU. On that basis and without prejudice to any subsequent position that the Commission may take on the methodology applied or in relation to the calculation of AMAR for other purposes, it appears that the number of AMAR of that service in the EU in the period preceding its publication exceeded the threshold laid down in Article 33(1) DSA.

As indicated above, the Commission designated ChatGPT as a VLOSE noting that the designation decision does not cover features which do not, on their own, based on their technical functionalities, qualify as an online search engine.

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), available at <https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>.