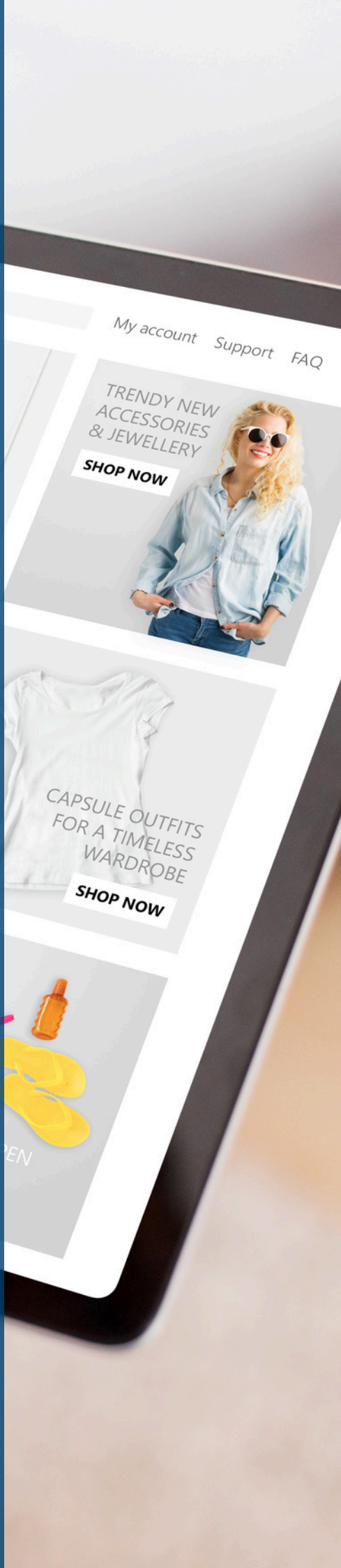
BEUC The European Consumer Organisation

REPORT

DIGITAL SERVICES ACT

Analysis of risk assessment reports by very large online marketplaces

November 2026



Why it matters to consumers

The most widely used e-commerce platforms by EU consumers are required to assess and reduce the real-life risks posed by their size and reach to their users under the Digital Services Act (DSA). However, BEUC's analysis shows a significant gap between what marketplaces identify as risks and what they claim to do to reduce these and the evidence of continued negative effects and dangerous products still present on these platforms. Based on this, BEUC has identified specific areas for improvement in these risk assessments to reduce the risks faced by consumers across the EU, such as features that stimulate addiction and the proliferation of illegal and unsafe products.

The European Consumer Organisation (BEUC) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents more than 40 independent national consumer organisations from over 30 European countries. Together with our members, we inform EU policies to improve people's lives in a sustainable and fair economy and society.

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INTRODUCTION

Under the Digital Services Act (DSA), providers of Very Large Online Platforms (VLOPs[1]) have to diligently identify, assess, and mitigate any systemic risks arising from the design, functioning, and use of their services. This includes addressing any potential negative effects on the exercise of the fundamental right to ensure a high level of consumer protection. This reflects the DSA's recognition that the scale and reach of VLOPs can generate risks that cannot be adequately addressed through the case-by-case enforcement of existing rules alone.

To create real accountability, these large companies have to publish at least once a year a report setting out their analysis of the risks posed by their platforms and what measures they are taking to mitigate them. Drafting and publishing comprehensive and detailed risk assessment reports is essential to ensuring transparency and enabling public scrutiny of platforms' compliance with their obligations.

Ahead of the publication of the next round of risk assessment reports in November 2026, the European Consumer Organisation (BEUC) analysed previous reports published by very large online marketplaces AliExpress, Amazon, SHEIN, Temu, and Meta platforms' Instagram and Facebook and compared them to the evidence collected by our members across Europe. This investigation shows the discrepancy between the VLOPs' claims on the effectiveness of their mitigation measures and the real-life risks consumers remain exposed to.

This exercise is particularly important as dominant tech companies have spent the first three years of the DSA's application pushing a narrative of compliance with the EU digital rulebook. However, this stands in stark contrast to the research produced by consumer organisations and digital rights groups, and the formal investigations carried out by the European Commission.

The findings and recommendations presented in this document are an executive summary of a larger study that we submitted confidentially to the European Commission on 2 November 2026. For the complete analysis, we also looked at the yearly independent compliance audit reports that VLOPs must undergo under the DSA.

METHODOLOGY

Between June and August 2026, BEUC analysed the risk assessments published by AliExpress, Amazon, SHEIN, Temu, and Meta platforms' Instagram and Facebook[2]. We used the reports published after their respective designation as a baseline to evaluate compliance and considered more recent reports to evaluate compliance trajectories over time. This review also builds on evidence published by BEUC member organisations assessing the relevance of the mitigation measures used by VLOPs to address systemic risks.

[1] VLOPs are platforms whose monthly active users surpass the 45 million thresholds in the EU.
[2] Zalando is not analysed in depth, as the analysis of other providers is prioritised due to preexisting concerns about their compliance with legislation relevant to the protection of consumers.

KEY FINDINGS

1. Risks of addictive features keep being overlooked or underestimated

As part of their risk assessment obligations, VLOPs must identify, assess and mitigate "actual or foreseeable negative effects (…) and serious negative consequences to the person's physical and mental well-being". In other words, VLOPs must also assess risks stemming from their online interface design that may stimulate behavioural addictions, as the DSA text prescribes[3][4]. However, our analysis has found that risk assessment reports of the very large online marketplaces tend to underassess risks linked to over-gamification, addiction and the impact on mental health.

The presence of addictive designs is not limited to social media: they are widely used in online marketplaces, video games, AI chatbots, and trading platforms. Common dark patterns used in online marketplaces include nagging (i.e., prompting consumers to finalise a purchase even when they wish to cancel it) and false scarcity (i.e., displaying false messages such as "Only few left in stock"). These are just some of the patterns amongst the 10 dark patterns identified by BEUC's French member Que Choisir Ensemble on Amazon's online website and app. Que Choisir Ensemble also uncovered 10 different types of dark patterns on AliExpress, seven on SHEIN, and 11 on Temu, which is found to be the online marketplace with the highest number of dark patterns in France[5].

Additionally, BEUC's German member vzbv showed in 2025 how several marketplaces go beyond classic deceptive techniques to deploy 'hyper-engaging' dark patterns, which combine gamification elements with FOMO ('*Fear Of Missing Out*') techniques and supposedly time-sensitive promotions[6].

Gamification elements such as wheels of fortune (AliExpress, Temu), in-app games with virtual currencies (AliExpress, SHEIN), pop-ups (Temu, SHEIN), and virtual surprise eggs (Temu) are features that easily attract and stimulate addiction in consumers, particularly vulnerable ones, such as children. Since the EU KIDS Act proposal by the European Commission in September 2026 excludes online marketplaces from its scope, it becomes even more important for DSA enforcement to focus on this aspect to improve the protection of minors online.

Infinite scrolling (AliExpress, Temu, SHEIN), excessive push notifications (Temu), and intrusive reward systems (Temu, SHEIN) that create time pressure and strong incentives to buy are also omnipresent on these services. Consumers are praised for adding items to their basket and encouraged to pay immediately after the final item is added. These are all dark patterns which can lead to addictive behaviour.

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[3] Regulation (EU) 2022/2065 Digital Services Act Article 34, 19 October 2022. Available at https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng#art_34

[4] Digital Services Act, Recital 83. Available at https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng#rct_83

[5] Que Choisir, Dark Patterns dans l'E-Commerce – les interfaces trompeuses sur les places de marché en ligne, 20 June 2024. Available at https://www.quechoisir.org/action-ufc-que-choisir-dark-patterns-sur-les-sites-d-e-commerce-l-ufc-que-choisir-appelle-les-autorites-a-sanctionner-les-interfaces-trompeuses-n125978/?dl=137778

[6] Vzbv, Manipulatives Design auf Online-Marktplätzen und Social-Media-Plattformen, 15 January 2025. Available at https://www.vzbv.de/sites/default/files/2025-01/vzbv_Dark-Patterns_Untersuchung.pdf

BEUC has already found in 2024 that Temu's manipulative design practices, including gamification and reward mechanisms, can exploit consumers' behavioural vulnerabilities and encourage excessive spending[7]. As a result, BEUC member organisations submitted complaints to the national Digital Services Coordinators (DSCs). BEUC highlighted a significant list of issues, including insufficient measures to protect consumers from unsafe content. Forced gamification was also one of the problematic practices identified by the Consumer Protection Cooperation (CPC) Network in its coordinated action against Temu in November 2024[8]. The action remains ongoing at the time of writing.

BEUC's research into SHEIN showed similar findings on the use of dark patterns to stimulate addiction and push overconsumption[9]. This research resulted in complaints[10] filed with the European Commission and European consumer protection authorities, together with 25 members from 21 countries.

Moreover, BEUC's research on influencer marketing highlighted how SHEIN and other fast fashion platforms benefit from influencer content to promote their products, engage consumers, and build trust and credibility, including among younger audiences[11]. Together, these practices can encourage excessive purchasing and over-consumption. This leads not only to financial harm to consumers but also exacerbates the environmental and societal impacts of the fast fashion industry.

Despite this overwhelming evidence, our analysis of risk assessment reports showed how very large online marketplaces tend to underassess risks linked to over-gamification. AliExpress[12,13], SHEIN[14], and Temu[15] all offer a very restrictive assessment of the risks related to behavioural addiction that come from addictive designs. Gamification is either assessed only from the lens of malicious entities (e.g., users who abuse mini-games to mass-claim rewards) or not present at all in risk assessment reports. As for Amazon, the assessment of risks related to behavioural addiction is totally absent from their reports between 2023 and 2025[16].

Even where risks of addiction to mental health are identified, such as by SHEIN and Temu, the platforms do not acknowledge the specific features that may cause addiction. In these cases, platforms significantly overestimate the effectiveness of the mitigation measures they deploy against these risks. This leads to low-risk categorisations that are disproven by the evidence found by consumer organisations.

[7] BEUC, Taming Temu: why the fast-growing online marketplace fails to comply with the EU Digital Services Act, May 2024. Available at https://www.beuc.eu/sites/default/files/publications/BEUC-X-2024-046_Temu_Why_the_fast-growing_online_marketplace_fails_to_comply_with_the_DSA.pdf

[8] EC, Commission and national authorities urge Temu to respect EU consumer protection laws, 8 November 2024. Available at https://ec.europa.eu/commission/presscorner/detail/en/ip_24_5707

[9] BEUC, Click to buy (more) - How fast fashion giant SHEIN uses dark patterns to push overconsumption, June 2025. Report available at https://www.beuc.eu/sites/default/files/publications/BEUC-X-2025-051_How_fast_fashion_giant_SHEIN_uses_dark_patterns.pdf

[10] BEUC, Consumer groups file complaint against SHEIN for dark patterns fuelling over-consumption, 5 June 2025. Press release available at https://www.beuc.eu/press-release/consumer-groups-file-complaint-against-shein-dark-patterns-fuelling-over-consumption

[11] BEUC, Influencer Marketing Unboxed, December 2025. Report available at https://www.beuc.eu/reports/influencer-marketing-unboxed-exposing-how-fast-fashion-and-food-sectors-hook-consumers

[12] AliExpress' 2024 risk assessment report, available at https://files.alicdn.com/tpsservice/3679fe26faf49a587280bd28a1c70020.pdf

[13] AliExpress' 2025 risk assessment report, available at https://files.alicdn.com/tpsservice/b1e5c47188c3d161d91de46033988a69.pdf

[14] SHEIN's 2025 risk assessment report, available at https://files-c.ltwebstatic.com/ccc/2025/12/19/17661349099679709.pdf

[15] Temu's 2025 risk assessment report, available at https://dl.kwcdn.com/legal-report/20195053bec/84b7b92528bcbfe57a0c1e438f58f99c.pdf

[16] Amazon's risk assessment reports, available at https://trustworthyshopping.aboutamazon.com/resources/digital-services-act-dsa

Overall, the reports overlook harms posed by gamification features and ignore hyper-engaging dark patterns that hook consumers into problematic use patterns. Consumer groups across Europe have alerted several times about the use of such practices and their effect on consumer behaviour, yet online marketplaces continuously fail to identify and address the risks.

2. Reports overestimate effectiveness of measures to prevent risks from illegal/harmful products

As part of the DSA risk assessment obligations, VLOPs also have to analyse the dissemination of illegal content on their platform[17]. For online marketplaces, this means risks related to the sale of illegal and unsafe products[18].

Our analysis found that platforms do recognize the risks related to illegal/unsafe products. However, the risk scores attributed by VLOPs are lower than one could reasonably expect, considering the vast amount of illegal and/or harmful products which can still be found on these platforms. Additionally, the mitigation measures listed lack precision, and evidence found by consumer organisations indicates a clear lack of their effectiveness.

BEUC member organisations continue to find evidence of illegal and/or harmful products to this day. In 2025, BEUC's Danish member Forbrugerrådet Tænk (FBRDK) found that shoes[19] and jackets[20] purchased on AliExpress, SHEIN, Temu, and Amazon contained harmful substances. In a cross-country test conducted in the same year, BEUC members from France (Que Choisir Ensemble[21]), Denmark (FBRDK[22]), and Germany (Stiftung Warentest[23]) found that 59 out of 81 baby toys, USB chargers, and jewellery products purchased randomly from SHEIN and Temu did not meet European safety standards. Toy Industries of Europe (TIE) found dangerous toys on AliExpress[24], and FBRDK found unsafe slime toys on SHEIN, Temu and Amazon[25].

[17] See note 3.
[18] Digital Services Act, Recital 80. Available at https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng#rct_80
[19] Forbrugerradet Taenk, Kemitest: Sko, 28 May 2025. Available at https://taenk.dk/test/kemitest-sko
[20] Forbrugerradet Taenk, Most waterproof jackets from Amazon, Shein and Temu contain harmful PFAS, 6 May 2025. Available at https://taenk.dk/kemi/visit-our-english-version/most-waterproof-jackets-amazon-shein-and-temu-contain-harmful-pfas
[21] Que Choisir,Temu, Shein – Petits prix, maxi-risques, 30 October 2025. Available at https://www.quechoisir.org/enquete-temu-shein-petits-prix-maxi-risques-n172256/
[22] Forbrugerradet Taenk, Undersøgelse finder igen usikre produkter på Temu og Shein, 30 October 2025. Available at https://taenk.dk/forbrugerliv/elektronik-og-digitale-tjenester/undersoegelse-finder-igen-usikre-produkter-paa-temu
[23] Stiftung Warentest, Gefähr-liche Schnäppchen (Temu and Shein), 30 October 2025. Available at https://www.test.de/Temu-und-Shein-Gefaehrliche-Schnaeppchen-6253491-0/
[24] In 2024, a pan-European assessment by Toy Industries of Europe (TIE), found that 80% of toys bought from third-party traders on online marketplaces fail EU safety standards and could be a danger to children. TIE, 17 October 2024. Available at https://assets.toyindustries.eu/resources/2024/TIE%20-%20list%20of%20unsafe%20toys%20bought%20%20-%2017%2010%202024%20-%20clarified%20version.pdf
[25] Forbrugerradet Taenk, Avoid Slime Toy Bought outside the EU, 1 November 2024. Available at https://taenk.dk/kemi/visit-our-english-version/avoid-slime-toy-bought-outside-eu

Investigations by BEUC's UK member Which? and Danish member FBRDK have also repeatedly exposed how unsafe electrical appliances[26], baby products[27,28] and misleadingly labelled ladders[29] can still be found on Amazon, despite the platform's claims of investments in product safety and blocking of 200 million products worldwide in 2022. In fact, for almost a decade, consumer organisations have been warning that Amazon lists dangerous products[30] and fails to take them down when requested, despite previous safety alerts and notifications.

Even in 2026, BEUC's French member Que Choisir Ensemble's study raises serious concerns about the safety of sunscreens sold on SHEIN, Temu, and AliExpress, with tested products providing inadequate sun protection or containing harmful ingredients[31].

All this evidence points to a tendency of VLOPs to underassess the risks associated with illegal/unsafe products and to overestimate the effectiveness of mitigation measures to prevent the sale and reappearance of unsafe products.

3. Lack of consultation with relevant stakeholders

The Digital Services Act specifies that VLOPs should involve representatives of their server's recipients to design their risk mitigation measures[32] and include information about such consultations in their risk assessments[33].

SHEIN and Amazon claim that several stakeholders were consulted for the purposes of elaborating their risk assessment report, including not-for-profit organisations and consumer groups. However, they systematically fail to disclose if and how providers consulted and engaged with external stakeholders. In comparison, AliExpress does not mention civil society organisations or consumer groups at all in its reports.

Despite European consumers being the most prominent recipients of their services, BEUC, as the Consumer Voice in Europe, was not consulted by any of these platforms specifically for the purpose of assessing systemic risks and design mitigation measures. This raises serious concerns about the extent to which providers meaningfully involve relevant stakeholders in their risk assessment and mitigation processes.

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[26] Which?, Illegal and potentially dangerous 'energy-saving' plugs still widely available, 12 May 2025. Available at https://www.which.co.uk/news/article/illegal-and-potentially-dangerous-energy-saving-plugs-still-widely-available-aRj6E8g6e7AX

[27] Which?, Baby swim floats sold on Amazon, eBay and Vinted may put children at risk of drowning, Which? Warns, 16 October 2026. Available at https://www.which.co.uk/policy-and-insight/article/baby-swim-floats-sold-on-amazon-ebay-and-vinted-may-put-children-at-risk-of-drowning-which-warns-aWdGm8e69v9B

[28] Which?, Baby products that risk serious injury or death for sale on online marketplaces, 8 July 2026. Available at https://www.which.co.uk/news/article/baby-products-that-risk-serious-injury-or-death-for-sale-on-online-marketplaces-aUMcL3b6PDRo

[29] Which?, Which? finds dozens of 'dangerous' ladders online after trader was seriously injured by fall from product bought on Amazon, 13 March 2026. Available at https://www.which.co.uk/policy-and-insight/article/which-finds-dozens-of-dangerous-ladders-online-after-trader-was-seriously-injured-by-fall-from-product-bought-on-amazon-a9TSP8P1zD3w

[30] Which?, Dangerous toys and killer car seats listed for sale at online marketplaces like Amazon and eBay, 20 November 2019. Available at https://www.which.co.uk/news/article/dangerous-toys-and-killer-car-seats-listed-for-sale-at-marketplaces-like-amazon-and-ebay-aAsQh3D3rPBM

[31] Que Choisir, Crèmes solaires - Le bilan désastreux des plateformes chinoises, 8 July 2026. Available at https://www.quechoisir.org/actualite-cremes-solaires-le-bilan-desastreux-des-plateformes-chinoises-n177286/

[32] Digital Services Act, Recital 90. Available at https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng#rct_90

[33] Digital Services Act, Article 42(4)(e). Available at https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng#art_42

4. Investigations lead to better compliance: the case of AliExpress

It is worth noting that AliExpress' 2025 risk assessment report presents an improvement in the assessment of risks, as they provide slightly more details compared to the previous version. While not sufficient, we note that this was the only example of a platform showing visible improvements among those analysed[34].

The European Commission engaged early on in regulatory dialogue with AliExpress by opening an investigation into its 2023 risk assessment report in March 2024[35]. We believe the small improvements between 2024 and 2025 are the result of this direct engagement, suggesting that effective DSA enforcement can incentivise VLOPs to improve the quality of their risk assessments and strengthen their compliance. And improved compliance means ensuring a higher level of consumer protection.

RECOMMENDATIONS FOR INVESTIGATIONS AND FUTURE RISK ASSESSMENT REPORTS

Recommendation: The European Commission should carefully examine very large online marketplaces' risk assessments and challenge any conclusions that underestimate the likelihood or severity of risks without sufficient evidence.

Concerning the 2026 round of risk assessment reports, we recommend that the Commission prioritise whether VLOPs bring convincing evidence to substantiate their risk assessment. Evidence-based analysis should help determine whether risks are likely to occur and how they are assessed and mitigated.

In many cases, VLOPs refer to multiple reports highlighting very low/low severity and/or probability of a given risk to justify the absence of mitigation measures. Here, the risks related to mental well-being and addiction posed by hyper-engaging dark patterns and other manipulative practices are a prime example. As we presented above, online marketplaces consistently overlook the harms posed by their gamification features, ignoring how these may hook consumers into problematic use patterns.

In other cases, such as the risk of illegal and unsafe products being sold on VLOPs' services, the evidence brought forward by consumer organisations clearly contradicts the claimed effectiveness of mitigation measures. Risk assessment reports should be grounded in reality. They should not be used as an exercise to claim compliance but rather as a tool to bring about greater levels of consumer protection in the EU.

[34] This assessment excludes SHEIN and Temu, as both platforms have only published their 2025 risk assessment report.
[35] EC, Commission decision initiating proceedings pursuant to Article 66(1) of Regulation (EU) 2022/2065, 14 March 2024. Available at https://ec.europa.eu/newsroom/dae/redirection/document/104859

Recommendation: The European Commission should make full use of its enforcement powers under the DSA to address shortcomings in risk assessments and ensure that identified breaches lead to concrete improvements in compliance.

As noted above, the only VLOP that shows visible improvements in its risk assessment reports over time is AliExpress, which was the first among the marketplaces analysed whose risk assessment report was investigated by the European Commission. Continued and consistent enforcement will be essential to ensure that these improvements expand to other platforms and translate into more effective mitigation of systemic risks and, ultimately, stronger consumer protection.

The Commission has made the safety of products sold online a priority in its DSA enforcement. On 28 May 2026, it issued a €200 million fine to Temu for failing to comply with its risk assessment obligations related to the platform's 2024 report.

Already in May 2024, BEUC member organisations submitted complaints to the competent national Digital Services Coordinators, highlighting several issues, including insufficient measures to protect consumers from unsafe content and manipulative practices[36]. Picking up on these complaints, the European Commission opened an investigation into Temu's compliance with its DSA obligations to assess and mitigate risks related to the sale of non-compliant products in the EU, the addictive design of its service, to disclose the main parameters used by its recommender systems, to provide a recommender system option not based on profiling, and to give researchers access to data[37].

The Commission found that Temu did not diligently assess the specific risks posed by its marketplace. Temu submitted an action plan that the Commission accepted on 26 October 2026[38]. Implementation of these corrective measures should be closely supervised to ensure that the non-compliance decision improves the VLOP's risk assessment practices and strengthens consumer protection.

Other parts of BEUC and its members' complaints remain ongoing, such as concerns related to addictive design features, recommender systems, and risk mitigation measures related to non-compliant products. BEUC calls on the European Commission to finalise these investigations shortly to ensure that Temu fully complies with EU rules and respects consumers' rights.

In February 2026, the European Commission also opened an investigation into the effectiveness of SHEIN's measures to mitigate the risk from the sale of illegal products and addictive designs, as well as the transparency of its recommender systems[39]. As referenced above, BEUC and its members have repeatedly exposed the widespread availability of illegal and harmful products on this platform and

[36] BEUC, Taming Temu: why the fast-growing online marketplace fails to comply with the EU Digital Services Act, May 2024. Available at https://www.beuc.eu/sites/default/files/publications/BEUC-X-2024-046_Temu_Why_the_fast-growing_online_marketplace_fails_to_comply_with_the_DSA.pdf

[37] EC, Commission opens formal proceedings against Temu under the Digital Services Act, 31 October 2024. Press release available at https://ec.europa.eu/commission/presscorner/detail/en/ip_24_5622. Decision available at https://ec.europa.eu/newsroom/dae/redirection/document/110873

[38] EC, Commission accepts Temu's corrective measures to terminate breach of the Digital Services Act, 26 October 2026. Press release available at https://digital-strategy.ec.europa.eu/en/news/commission-accepts-temus-corrective-measures-terminate-breach-digital-services-act

[39] EC, Commission launches investigation into Shein under the Digital Services Act, 17 February 2026. Press release available at https://ec.europa.eu/commission/presscorner/detail/en/ip_26_420

SHEIN's reliance on addictive designs to push overconsumption. We welcome this development and call on the Commission to conclude this investigation as soon as possible.

The European Commission should also devote more attention to the risk assessment reports published by Amazon and Meta. Amazon has not been the subject of any DSA investigation so far, but the analysis we privately submitted to the Commission revealed several shortcomings in how the online marketplace assessed the risks posed by its service and in the effectiveness of the mitigation measures put in place.

On the other hand, several investigations are currently ongoing against Meta, but none of them relate to Facebook Marketplace and Instagram Creator Marketplace. While two sets of preliminary findings issued in 2026 relate to Meta's failure to identify and mitigate risks[40,41], these focus solely on the protection of minors on its services.

Recommendation: Meta needs to take better consideration of Facebook and Instagram Marketplaces in their reports.

It is extremely concerning that Meta does not seem to consider the importance posed by either Facebook Marketplace or Instagram Creator Marketplace. Meta's risk assessments for Facebook[42] and Instagram[43] are largely identical. When it comes to their online marketplace services, the analysis barely goes beyond one page in both the 2024 and 2025 reports and is limited to assessing the risks of the sale of drugs and firearms as restricted goods and services[44].

Meta needs to take better consideration of Facebook Marketplace and Instagram Creator Marketplace in its future risk assessment reports. The analysis of illegal and unsafe products should extend beyond restricted goods like drugs and firearms. Additionally, the risks of fraud should take into account the lack of controls surrounding fake webshops, as exposed by BEUC's Dutch member Consumentenbond[45], and Meta's systemic failure to take effective action against financial scams on its services, as revealed by recent research by BEUC and 13 of its members[46].

[40] EC, Commission preliminarily finds Meta in breach of Digital Services Act for failing to prevent minors under 13 from using Instagram and Facebook, 29 April 2026. Available at https://ec.europa.eu/commission/presscorner/detail/en/ip_26_920

[41] EC, Commission preliminarily finds the addictive design of Instagram and Facebook in breach of the Digital Services Act, 10 July 2026. Available at https://ec.europa.eu/commission/presscorner/detail/en/ip_26_1579

[42] Facebook's 2024 risk assessment report, available at https://transparency.meta.com/sr/dsa-sra_results_report-2024-facebook; Facebook's 2025 risk assessment report, available at https://scontent-lhr11-1.xx.fbcdn.net/m1/v/t0.84174-6/AQMmfmydpjMZSw0-8oiW1Fz7kJdgaJvJO3jRPlDIKYe1bhR8ax5QuhzyAqIdw9lrWL7NsBw-nC8hIGFa-0LiWGZbRqwVcbnynPyxTwL5TQLTRjNLZwU3ibzCR2D_puw2Gh-8FPRizO94MpKCXtNl_IcAH6gEQFBDwjv-aVu2wA?_nc_gid=nrevXpZml2T_HpXCgfqV0Q&_nc_oc=AdoVfU3w1W-t2s5QmES2xKoLueSyfrm_3qpQz7j-F1MDf7ZGehl9TCSkiJLAcM9-Nr8&ccb=10-5&oh=00_AQS_PujRBaHLDRAWb56bfnkqxogcscaW3xA6szMSz7L5Kw&oe=6AFE131F&_nc_sid=68f2c3. Last consulted 17 November 2026.

[43] Instagram's 2024 risk assessment report, available at https://transparency.meta.com/sr/dsa-sra_results_report-2024-instagram; Instagram's 2025 risk assessment report, available at https://scontent-lhr11-1.xx.fbcdn.net/m1/v/t0.84174-6/AQP-MRAmNMaYnuVKTrfxrhx8sFBzp0B0E0kRIQR5g7nUdSjPTusydVYDvEz_omS_WHbGftjdknPAkzmwk_bJCW2RToJvwhpXz0tl0aBiPBAZvFh6Gvm1nLx_DuOzUPT6QV08jBREr4PaWIKcalhGmInJmcUCFEdtvsIgZZHbBw?_nc_gid=nrevXpZml2T_HpXCgfqV0Q&_nc_oc=AdpYYHZ47ELmszyZCCL7KRqk6LmAUsxPpq_dgeZaxNmTJFKelPz0j9b3TjtMQyx7evI&ccb=10-5&oh=00_AQQ0RCtLp8ce0VUakxkYp-eDZajb2XSHfK5AeK3a7mR02A&oe=6AFDE983&_nc_sid=68f2c3. Last consulted 17 November 2026.

[44] Section 6.2.2.16 in the 2024 reports and Section 5.2.2.17 in the 2025 reports for both Facebook and Instagram.

[45] Consumentenbond, Meta laks in aanpak advertenties voor nepwebshops, 24 September 2024. Available at https://www.consumentenbond.nl/nieuws/2024/meta-laks-in-aanpak-advertenties-voor-nepwebshops

[46] BEUC, Sponsored by Scammers, May 2026. Available at https://www.beuc.eu/sites/default/files/publications/BEUC-X-2026-043_Report_Sponsored_by_Scammers.pdf


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