



Undue Influence(rs): How Platforms Must Step Up under the DSA to Protect Democracies

***Policy Recommendations for
VLOPs, VLOSEs,
and The European Commission***

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ABOUT THE PROJECT

The Civil Liberties Union for Europe (Liberties) supports effective enforcement of the *Digital Services Act* (DSA) and the *Transparency and Targeting of Political Advertising Regulation* (TTPA) through independent research and policy analysis.

In 2024, we conducted [election advertising monitoring in six EU Member States](#), identifying key trends and regulatory gaps in paid political communication across platforms. We also published a report exploring the obligations of Very Large Online Platforms and Search Engines under Articles 34 and 35 of the DSA, with a focus on risks to [civic discourse and electoral processes](#). Additionally, we assessed the [independence of Digital Services Coordinators](#) through a separate monitoring study published in early 2025.

This paper focuses on influencer-driven political content as an emerging challenge to transparency, platform accountability, and electoral integrity in the EU. It forms part of our broader work on strengthening fundamental rights and democratic safeguards in the digital public sphere.

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Executive Summary

As influencer-driven political communication becomes increasingly prevalent online, the lack of platform oversight and consistent transparency mechanisms poses a growing threat to democratic discourse. This policy brief focuses on how Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) have failed to meaningfully address the risks associated with monetised political speech by influencers under the Digital Services Act (DSA) and what measures they should introduce. The resulting lack of transparency presents a growing threat to electoral integrity and democratic accountability.

This paper calls on platforms to introduce practical mitigation measures that promote disclosure, support user awareness, and strengthen accountability. Recommendations include:

- Voluntary disclosure tools and mandatory labelling for influencer content paid for or coordinated with political actors;
- Algorithmic detection and user-facing prompts for large accounts publishing political content;
- More accessible and integrated political ad libraries with long-term data retention, improved searchability, and full funding chain disclosure;
- Election-period controls such as boosting restrictions, manual content reviews,

and rapid response channels for high-risk content;

- Better support for user comprehension through digital literacy tools and platform interface transparency.

We also urge the European Commission to take a more assertive role in ensuring DSA compliance, including clearer expectations for election-related risk mitigation and the publication of guidance on civic discourse beyond electoral periods. The Commission must make clear that, although its Guidelines are not formally binding, platforms are expected to align their practices with them where appropriate, and that while a one-size-fits-all approach is not required, complete disregard is unacceptable. It should also take enforcement action where platforms systematically fall short.

1. Introduction

On 25 April 2023, the European Commission designated the first set of Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) under the Digital Services Act (DSA). This designation opened a new chapter in European platform regulation, imposing enhanced obligations on platforms with significant reach based on their systemic influence over public discourse and information access.

The obligations under Articles 34 and 35 became applicable on 25 August 2023. VLOPs and VLOSEs were then required to conduct risk assessments, implement proportionate mitigation measures, and submit to external audits.¹ These requirements aim to shift platform governance toward a more proactive stance. The mandatory release of risk mitigation reports is meant to promote transparency and accountability, thereby creating a basis for public oversight.²

The Commission has repeatedly communicated its expectation that risk assessments will mature gradually through collaborative learning among platforms, regulators, researchers, and civil society. This paper contributes to that learning by examining a mostly overlooked source of risks: monetised political speech by influencers, particularly when it is undisclosed.

We believe that the issue of covertly monetised political speech by influencers must be addressed as a matter of urgency. The phenomenon is becoming increasingly prevalent, and in the absence of effective and proportionate platform policies, it poses a growing threat to democratic integrity, the fairness of elections, and, ultimately, the rule of law.

We recommend that the European Commission reinforce implementation of the DSA, including updates to the existing election-related guidelines. It should also clarify to platforms that, while these guidelines are not legally binding, platforms are expected to align their practices with them where appropriate. A

- 1 In what follows, we will use ‘platforms’ interchangeably with VLOPs and VLOSEs. The term ‘risk mitigation’ will be used as shorthand to refer to this entire process, including introducing and reporting about mitigation measures and follow-up actions taken in response to audit findings. “Commission” will always refer to the European Commission.
- 2 The first reports were published in November 2024. What we have learned from these initial publications is that many platforms appear to treat risk assessment as a box-ticking exercise rather than a substantive reflection on systemic risks. Stakeholder engagement has been minimal, and in most cases, civil society has had no meaningful role in the process. The absence of common standards or guidance has resulted in platforms presenting data and logic in different formats, making it difficult, if not impossible, for public interest organisations to carry out meaningful comparative analysis. It is also worth noting that while many of the reports published so far do not cover the 2024 European Parliament election period, initial indications suggest that most platforms have yet to meaningfully apply the Commission’s election-specific guidelines or incorporate them into their risk mitigation strategies.

one-size-fits-all approach is not required, but complete disregard is unacceptable. Any alternative mitigation measures adopted must be proportionate, effective, and evidence-based.

In line with this, we recommend that platforms systematically review their policies pertaining to influencers, strengthen their enforcement mechanisms, and, where applicable, introduce the measures proposed in this paper or present alternative solutions that demonstrably outperform them. Such alternatives should be supported by data, research, or experimental evidence.

Where platforms fail to do so, the Commission must be prepared to take enforcement action. In the current context of growing pressures on democratic institutions, enforcement is not a matter of principle alone, it is a democratic necessity.³

2. Who Are Influencers and How Is Their Speech Monetised?

For this paper, we define influencers as follows: An influencer is an online content creator who builds trust- and authenticity-based relationships with their audience, primarily on social media platforms.⁴

Influencers represent a diverse group of individuals producing content on a wide range of topics. Many build and maintain an audience as a source of income, while others may engage in this authenticity-driven form of communication to share their convictions or educate the public as an unpaid hobby or service. The key point, however, is that a financial interest is often involved, particularly in the case of high-reach influencers. At that level, remaining competitive frequently requires a degree of professionalisation, which may include hiring

3 It should be noted that the upcoming [Transparency and Targeting of Political Advertising Regulation](#) (TTPA) is expected to introduce specific obligations concerning political advertisements, including monetised political speech by influencers. However, the much needed interpretive guidance from the Commission is pending. Rather than attempting to anticipate this guidance, our analysis focuses on what the DSA framework should already address with regard to emerging risks. Significantly, in anticipation of the regulatory uncertainties surrounding the TTPA and the risk of potential fines, one of the major platforms, Google (which owns YouTube) has [announced](#) that it will ban political advertising in the EU. In [our view](#), this is an unfortunate development for several reasons. Notably, it may also incentivise a shift towards covertly monetised political content produced by influencers, making it even more difficult to identify, track, and regulate monetised political messaging effectively.

4 This definition is a broadened version of the definition used by [Michaelsen, F., Collini, L. et. al., 2022](#). This IMCO study excludes political influencers from its scope. In order to adjust the definition to the political sphere we removed “commercial intent” and “monetisation” from the definition, mainly to make space for what we later call Category 2 and Category 3 influencers.

production teams and adopting commercial strategies.

Within this broader landscape, political influencers form a distinct, although highly diverse, subgroup. For the purposes of this paper, we categorise them as follows:

- Category 1: Lifestyle or non-political content creators who occasionally address political topics.
- Category 2: Political commentators, public intellectuals, and media figures.
- Category 3: Politicians and political candidates.

Category 1 creators typically build their audience through lifestyle, entertainment, or general interest content. Occasionally, they may share political opinions, either out of civic conviction or because they are compensated in some form. Their revenue streams often include platform monetisation schemes and brand sponsorships for individual posts or bundles of content. Political actors may approach them through a variety of channels, including direct outreach, informal networks, and specialised influencer marketing agencies.

Category 2 includes political commentators, public intellectuals, podcasters, bloggers, and journalists who regularly address political issues online. While some are exclusively salaried by their primary employer, others monetise their content through platform-based monetisation tools. Some may also receive direct or indirect support from political organisations or actors.

Category 3 includes current or aspiring office-holders (1, 2, 3) who use digital platforms for campaigning or public engagement. While their primary objective may not be financial gain, some also monetise the content they publish on social media.

3. Undisclosed Monetised Political Speech: A Democratic Risk

Building on the academic analysis of commercial and political speech restrictions in Europe and in the US in the context of influencer communication by De Gregorio and Goanta, it is clear that political speech enjoys a particularly high level of protection in Europe. Freedom of expression is enshrined in both the European Convention on Human Rights and the Charter of Fundamental Rights of the European Union, as well as national constitutions. While both European and national frameworks allow for certain limitations on freedom of expression to balance it with other fundamental rights, political expression is afforded the strongest safeguards. According to the case law of the European Court of Human Rights (ECtHR), any restriction on political speech must meet strict conditions: it must be prescribed by law, pursue a legitimate aim, and be necessary in a democratic society. The ECtHR has consistently emphasised that political speech warrants the highest level of protection due to its central role in democratic societies, and that restrictions must be narrowly interpreted and convincingly justified (e.g. *Lingens v. Austria*). This approach leaves States with only a limited margin of

appreciation when restricting political expression, distinguishing it clearly from commercial speech, where a broader margin is allowed.

However, as De Gregorio and Goanta also note, the rise of the influencer market has blurred the traditional distinction between protected political speech and commercial expression. While many influencers may express genuine political views regardless of financial incentives, others are, sometimes clearly, sometimes subtly, communicating messages influenced by the prospect of monetary or comparable benefits. As a result, in this latter case, political speech is being transformed into a form of quasi-commercial speech, disguised as authentic personal political opinion.⁵

Covertly monetised political speech poses a significant risk to democratic integrity. When financial incentives are hidden or difficult to detect, audiences are unable to properly assess the credibility, intent, or coordination behind the messages they consume. This lack of transparency undermines informed political debate and creates fertile ground for manipulation.

The key risks include:

1. *Voter deception:*

- when political content appears to be an authentic personal opinion but is compensated, directly or indirectly, by a political campaign, party, or affiliated organisation.
- where creators present opinions as their own, unmotivated by personal financial gain, but dependency on revenue from a platform revenue-sharing scheme fundamentally shapes their messaging. In such cases, creators may be incentivised to align with political narratives that secure or preserve their income.

2. *Lack of accountability for political actors:*

- when paid influencer content remains undeclared, allowing political actors to circumvent campaign finance rules.
- when undeclared influencer content escapes inclusion in transparency tools, making it difficult or impossible for watchdogs and journalists to uncover contradictory messages or questionable targeting strategies.
- when covertly paid-for influencer content is used to disseminate political messaging

⁵ A similar issue exists in the context of commercial speech. When influencers promote products or services while presenting their message as personal or objective rather than commercial, it creates a transparency problem. Under the *Unfair Commercial Practices Directive* (UCPD), sponsored content must be clearly and prominently disclosed to ensure consumers are not misled. However, as the UCPD is a directive rather than a regulation, its transposition into national law has resulted in a fragmented enforcement landscape across the EU.

during campaign silence periods, thereby evading electoral rules.

3. *Amplification of disinformation:*

- as covert sponsorship is frequently associated with polarising, misleading, and coordinated messaging that exploits platform algorithms and evades scrutiny.

4. The EU Commission's Guidelines on Influencers

In April 2024, the European Commission published a dedicated set of guidelines to assist platforms in meeting their obligations under Articles 34(c) and 35 of the Digital Services Act, specifically concerning electoral processes.⁶ The document provides a framework for how platforms should address risks to democratic integrity, including those stemming from political advertising and influencer-driven content.

The Guidelines recognise the growing role of influencers in shaping public opinion and political discourse. To enhance transparency and safeguard electoral integrity, point 27.f outlines specific expectations for platforms regarding political content created or disseminated by influencers. In particular:

- “Provide a functionality to allow influencers to declare whether the content they provide is or contains political advertising, including the sponsor’s identity and, where applicable, the entity ultimately controlling the sponsor; the period during which the political advertisement is intended to be published, delivered or disseminated; the aggregated amounts and the aggregated value of other benefits received by the providers of political advertising services; display period, as well as meaningful information about the main parameters used to determine the recipient to whom the advertisement is presented.
- Ensure that other recipients of the service can identify in a clear, salient and unambiguous manner and in real time, including through prominent labelling, that the content provided is or contains political advertising, as described in the influencer’s declaration.”
- Section 27.e further recommends that platforms apply the definition of political advertising set out in the then forthcoming Transparency and Targeting of Political Advertising Regulation (TTPA), maintain a dedicated political ad repository, and, if political advertising is prohibited, enforce this policy through effective mechanisms.

6 Commission Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to Article 35(3) of Regulation (EU) 2022/2065 will be referred to as ‘Guidelines’.

Although these Guidelines are not legally binding, they reflect the Commission's interpretation of what constitutes good-faith compliance with systemic risk obligations under the DSA. Platforms that choose to depart from these expectations must be able to demonstrate that their alternative mitigation measures are (also) reasonable, proportionate and effective given the specificities of the platform.

The following section examines how major platforms have responded to these expectations and where their current self-regulatory measures fall short.

5. Platform Responses and Self-Regulation: Superficial and Inadequate

Despite growing regulatory attention and clear recommendations from the European Commission, major platforms have not meaningfully addressed the challenge of political influencer marketing. Crucially, they have failed to extend the transparency and accountability safeguards that apply to formal political advertising to influencer-driven political content. Instead, most platforms rely on superficial solutions, such as banning political ads by influencers altogether, that merely push these practices underground, where covert political influence campaigns may flourish unchecked.

Because no disclosure mechanisms exist for political content published organically, political sponsorship often remain hidden outside

formal advertising systems. Furthermore, platform bans on paid political content create strong incentives for non-disclosure: influencers risk platform penalties if they are transparent about political sponsorships. These fundamental gaps in platform policies undermine transparency efforts and allow covert political advertising to continue largely undetected.

The subsections below examine the policy approaches of key platforms, highlighting the persistent gaps and enforcement failures.

5.1 Meta (Facebook and Instagram)

Meta maintains public ad libraries and, within the EU, [requires verification for political advertisers](#). While it updated its [branded content policy](#) to permit political influencer partnerships, this applies only to the [United States](#). In contrast, within the EU, Meta prohibits the use of branded content tools by “current elected and appointed government officials, political candidates, political parties, and political committees”. That is, political actors are not (supposed to) get business partner authorisation for branded content. As a result, political content promoted by influencers in the EU remains outside formal disclosure systems unless it is distributed as a classic paid advertisement via [Meta's Ads Manager](#). It is unclear whether [boosted posts](#), posts that started as organic content but then their authors paid for extra visibility, are consistently shown in the Ad Library.

Meta offers a [Branded Content Library](#) and a separate [Ad Library](#). The Branded Content

Library allows users to search for posts by a business or creator only, while the Ad Library enables keyword-based searches for paid political ads as well. However, both tools present usability challenges. Their fragmented structure, limited search functionality, and inconsistent labelling make them difficult to navigate, even for trained researchers, and largely inaccessible for the average user.

5.2 TikTok

TikTok explicitly prohibits sponsored political influencer content. It also goes a step further by banning all forms of [paid political advertising](#) on its platform. However, the 2024 Romanian presidential elections demonstrated that paid political content still circulates on TikTok, and in significant numbers. TikTok has launched election centres and civic content labels as part of its transparency efforts, but these tools are not equipped to identify coordinated or monetised influencer activity, nor do they address the financial incentives behind such content. In the absence of a political ad library and given the poor accessibility of its [commercial ad library](#), violations of the platform's advertising ban remain largely invisible to the public.

In the absence of a political ad library (for the banned but detected political ads) and with a [user-unfriendly commercial ad library](#), attempts to circumvent the prohibition remain largely hidden from the public.

Thus, TikTok's formal ban on paid political content does not prevent covert influence operations, it merely drives them further underground.

5.3 YouTube

YouTube seems to enable all kinds of content creators, including political content creators, to monetise their work. For example, creators participating in the YouTube Partner Program receive a share of the revenue generated from ads displayed alongside their content. It is unclear whether YouTube's own BrandConnect platform, which facilitates partnerships between creators and advertisers, allows political advertisers to engage with influencers. What is known is that Google, YouTube's owner, requires [election ad verification](#) for political actors who want to advertise in paid political advertisements on its platforms.⁷

While YouTube presents itself as [promoting transparency](#) in paid content, its current tools offer limited utility. Its [ad libraries](#), including the political ad library, are challenging to navigate and suffer from data integrity issues. Their narrow definition of political advertisement very clearly diverges from that of the TTPA. [Searches](#) for paid product placements or sponsored videos yield little meaningful information for users or researchers attempting to trace political influence or financial relationships.

7 Importantly, YouTube has [announced](#) its intention to ban all forms of political advertising in the EU once the Transparency and Targeting of Political Advertising Regulation (TTPA) is fully in force as a pre-emptive response to anticipated compliance risks.

5.4 X (formerly Twitter)

X prohibits political advertising in the European Union. While it has lifted its global ban in certain countries, including the [United States](#) and the United Kingdom, its current policy does not list the EU among the jurisdictions where political content ads are permitted. In countries where political advertising is allowed, X requires identity verification and disclosure through its formal ad system. Influencers operating within the EU can still publish and promote political content without formally advertising. Instead of posting ads, they can attempt to [boost their post](#), hoping it won't be identified as banned content by algorithms.

X maintains an [Ads Repository](#) intended to provide transparency for advertising. The tool is extremely user-unfriendly. Searches are slow, require downloading CSV files, and lack intuitive filtering or browsing options. The format and functionality make it inaccessible to average users and difficult even for researchers or watchdog organisations to extract meaningful insights. As a result, the repository fails to provide effective transparency and does not meet the standards set by comparable platforms in terms of usability or public accountability.

5.5 Additional Observations

- Platform policies are often opaque and difficult to interpret, even for experienced researchers. This lack of transparency hampers the work of civil society organisations, watchdogs, and litigators, who are unable to monitor, explain, or enforce the rules effectively. Moreover, it is unrealistic to expect the average user to understand why certain content appears in their feed. Without targeted online literacy initiatives, it is unlikely that users, especially from vulnerable groups, are aware of the market incentives potentially influencing professional influencers talking about politics. Therefore, financial incentives and underlying interests generally remain opaque, leaving users unaware of who is funding the content they see and why.
- In December 2024, the European Commission [opened](#) formal proceedings against TikTok under the Digital Services Act, focusing on the platform's management of risks to elections and civic discourse. The investigation centres on two key areas: (i) the role of TikTok's recommender systems in facilitating coordinated inauthentic behaviour or automated manipulation, and (ii) the platform's policies on political advertisements and paid-for political content. However, Liberties' ongoing research indicates that it is not only TikTok where enforcement of the ban on monetised political influencer content is patchy. [Politico](#) found Instagram influencers working with the European Green Party. We double-checked their findings and discovered some of these influencers declared their content as branded content on Instagram (owned by Meta) and their content appears under the platform label as sponsored. Others published content with the hashtag "Paid by the European Green Party", but as a simple organic post. None of them can be found in the political section of the

Ad Library, where they should belong. It is unclear whether the posts were boosted, and it is also unclear how the European Greens (along with other parties) could qualify as ‘business’ in the branded content library despite the ban.⁸

- We found no trace indicating that any platforms currently provide the affordance to influencers to declare organic posts as political advertising when no money is exchanged with the platform itself. In the best-case scenario, politically sponsored posts are informally marked by hashtags, but such disclosures fall far short of the standards recommended in the European Commission’s Guidelines. Critically, such posts are not integrated into political or even general ad repositories, leaving political influencer campaigns largely beyond public scrutiny.

6. Possible Risk Mitigation Measures Under the DSA

6.1 Challenges in Current Implementation

As demonstrated in the previous section, major platforms have not aligned their practices

with the Commission’s 2024 Guidelines. As a reminder, these Guidelines recommend, among other things:

- A broad definition of political advertising, in line with the TTPA;
- Mechanisms enabling influencers to declare political partnerships;
- Real-time, prominent labelling of paid political content;
- Effective enforcement of advertising bans, where applicable.⁹

We believe that while these expectations reflect the baseline for good-faith risk mitigation on any platform where civic discussion and influencers are present, platforms that serve as primary sources of information or opinion exchange for users should be held to a higher standard. These platforms must do considerably more to address the risks associated with monetised political speech by influencers.

Although the Commission’s Guidelines do not explicitly say so, they are particularly well suited to what we have referred to as Category 1 influencers, those who primarily create lifestyle, entertainment, or general interest content, but occasionally publish posts paid for by political actors outside the platform’s

⁸ The research brief with our findings is expected to be published in June 2025.

⁹ It remains to be seen whether the risk assessments covering 2024 will offer meaningful justifications for these omissions. To be credible, such justifications should rely on data, testing, and demonstrable impact, not simply restate that the platform has selected an alternative approach.

infrastructure. In such cases, the platform may not know at the outset that a particular post was sponsored. To mitigate the risk of voter deception, platforms should, in line with the Guidelines, enable influencers to declare when a post was paid for and ensure such posts are available in political ad repositories.¹⁰

However, monetary incentives in political speech are not limited to direct, off-platform payments. As discussed earlier, political messaging may also be monetised in other ways, often involving Category 2 and Category 3 influencers. These may include:

- Platform-facilitated partnerships between creators and advertisers;
- Revenue-sharing mechanisms, such as ads embedded in influencer content;
- Donations and crowdfunding, often promoted in an influencer's bio or profile;
- Informal benefits such as visibility, access, or professional opportunities, which may translate, for example, into a larger follower base and increased revenue through platform mechanisms.

While the last category involves informal, often opaque exchanges that platforms cannot reasonably monitor, the first three types of monetisation are squarely within the platforms' capacity to detect and disclose.

6.2 Suggested Mitigation Measures

To address these risks, platforms should implement targeted mitigation measures addressing distinct risk categories under their DSA risk mitigation duties. It is important to emphasise that any attempt to regulate monetised political speech must be proportionate and protect legitimate expression. The challenge lies in balancing transparency with freedom of expression. However, in the absence of effective disclosure and enforcement, covert influence and the viral spread of covert disinformation will continue to erode the integrity of elections and public discourse.

Several of the measures suggested below should also be introduced by platforms that prohibit political advertising. Bans on formal political ads do not eliminate the risk posed by covert influencer content. Platforms cannot use these bans to evade transparency obligations. They must ensure that any attempts to suppress political influencer activity do not produce unintended democratic harm by pushing influence operations and disinformation campaigns further underground.

Voter deception

1. Voluntary disclosure mechanisms:

In line with the Commission's recommendations, influencers should have user-facing tools to declare when organic posts are paid

¹⁰ It remains to be seen whether influencers will declare such cooperations, but first they need to be made possible.

for or coordinated with political actors, even when the platform is not involved in the transaction. The same should apply to boosted posts,

2. *Mandatory labelling:*

Where platforms facilitate brand-influencer partnerships (e.g., BrandConnect or equivalent), labelling should be mandatory.

3. *Algorithmic detection:*

Platforms should deploy machine learning tools to identify political content from large accounts (e.g., over 100K followers), with built-in prompts for disclosure and labelling. It is important that such labels do not imply that the influencer in question is unreliable. Instead, they should provide click-to-open information on how influencer monetisation works and how income may depend on what is said and how it is said. These labels could help users to understand how political influencer content is monetised and the role financial incentives may play in shaping content.

4. *Digital literacy and interface transparency:*

Platforms should improve the interpretability of their systems by developing targeted digital literacy tools and in-platform explanations. These should help users understand why they are seeing specific influencer content. As required by the DSA, transparency mechanisms must be accessible and meaningful for average users, not just policy experts. Current implementations

often fall short of this standard, especially in the context of influencer-driven content.

Lack of accountability

Measures aligning with the TTPA and the Commission's Guidelines:

1. *Inclusion in ad libraries:*

All influencer-driven paid political content should appear in platform-level political ad repositories with all the relevant information. This should align with the Commission's 2024 Guidelines and anticipate future obligations under the Transparency and Targeting of Political Advertising Regulation (TTPA), which will require all political advertisements, including those published as organic posts, to be forwarded to the shared EU political ad repository.

2. *Disclosure of funding chains:*

In line with the forthcoming TTPA, platforms should disclose the ultimate sponsor of political content, including any political actor on whose behalf the content is funded. In addition, to enable effective oversight, platforms should make visible any intermediary agencies or networks involved in facilitating these partnerships.

3. *Archiving:*

Monetised influencer political content should remain accessible in ad libraries for a defined retention period of at least seven years, ideally longer, in line with the

upcoming TTPA. This extended period is essential for ensuring continuity and accountability across electoral cycles. Ad libraries should include downloadable metadata and maintain audit trails that uphold data integrity, enabling long-term oversight by watchdogs, journalists, election authorities, and researchers.

Additional measures to ensure genuine transparency and usability:

1. Searchability:

Platform-level repositories should continue to be maintained and actively improved. Platforms should enhance data integrity, and also usability and research value through cross-referencing features, integrated branded content tools, and advanced research functionalities. The ad libraries should be user-friendly and allow intuitive searches across all paid political content, regardless of whether it is a paid ad, boosted or organic content. The libraries should offer flexible search options, including keyword variants, synonyms, and filtering by influencer, sponsor, topic, platform, and geographic scope, mirroring modern search engine capabilities.

Amplification of disinformation¹¹

1. Boosting restrictions:

Platforms should limit or flag boosted political content around election periods, particularly when posted by high-reach accounts. Boosting should trigger review workflows or transparency prompts to reduce the spread of covert influence.

2. Human review during electoral periods:

Given the high stakes of elections, platforms should conduct manual reviews of flagged political content in pre-election windows. This includes influencer posts with high engagement or coordinated amplification patterns.

3. Geolocation of political advertisers:

Platforms should verify the identity and location of political advertisers and influencers using government-issued IDs and IP verification. This helps prevent cross-border manipulation and ensures legal accountability.

4. Real-time monitoring and escalation channels:

Platforms should establish election-period rapid response teams capable of escalating high-risk influencer activity, particularly content flagged by election authorities or trusted civil society monitors.

11 The first four recommendations draw on insights from the [Integrity Institute's excellent paper](#) on boosted content and elections in Moldova. We are grateful for their work, which provided valuable guidance for our analysis.

5. *Content labelling for coordinated messaging:*

When platforms detect coordinated messaging campaigns, particularly those using similar talking points or visuals across influencers, they should flag this coordination in a visible, non-punitive way to alert users.

7. **Recommendations to the Commission**

To ensure effective implementation of the DSA, the Commission should take a more assertive role in guiding and overseeing platform compliance.

We recommend that the Commission:

- Update the 2024 election-related Guidelines and issue dedicated guidance on mitigating risks to civic discourse beyond electoral periods, as healthy civic discourse is an ongoing and essential feature of democratic life;
- Make clear that voluntary guidelines reflect the Commission's interpretation of good-faith compliance under the DSA;
- Set firmer expectations for meaningful risk assessments and targeted mitigation strategies, including those addressing covertly monetised political content;
- Require that risk mitigation reports be sufficiently detailed and transparent to allow meaningful scrutiny by watchdogs, journalists, and regulators;

- Proactively engage in oversight and apply enforcement measures where platforms demonstrate insufficient effort or transparency, in coordination with national Digital Services Coordinators where risks fall primarily within Member State competences, such as in national elections.

The Commission's leadership is essential to protecting electoral integrity and ensuring that covert political influence is addressed systematically across the platform ecosystem.

CONTACT

Civil Liberties Union for Europe

The Civil Liberties Union for Europe (Liberties) is a Berlin-based civil liberties group with 22 member organisations across the EU campaigning on human and digital rights issues, including the rule of law, media freedom, SLAPPs, privacy, targeted political advertising, AI, and mass surveillance.

Transparency register number:
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