

***FROM FIRST TO
SECOND ITERATION:
CIVIC DISCOURSE
AND ELECTORAL
PROCESSES IN DSA
RISK ASSESSMENT
AND MITIGATION
REPORTS***

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Executive summary

The second set of systemic risk assessment and mitigation reports published under Articles 34 and 35 of the *Digital Services Act* (DSA) in November 2025 **does not demonstrate substantive evolution** in how Very Large Online Platforms and Very Large Online Search Engines (VLOPSEs) conceptualise and **address risks to civic discourse and electoral processes**.

To assess progress between the first and second iterations, this report applies four analytical benchmarks: (1) Structural integration of design-related risks, (2) Breadth of civic discourse conceptualisation, (3) Assessability of mitigation effectiveness, and (4) Transparency of governance and stakeholder impact.

Across platforms, systemic risks continue to be framed primarily through a “**bad actor**” **paradigm** focused on disinformation, coordinated inauthentic behaviour, and foreign interference. Structural drivers of democratic harm, including engagement-based ranking, recommender system optimisation, monetisation incentives, and amplification logics, remain underexamined.

Civic discourse is predominantly treated as an **election-period integrity issue** rather than a continuous democratic infrastructure requiring structural safeguards. Broader risks to pluralism, marginalisation of minority voices, selective exposure, chilling effects, and lawful but harmful civic degradation receive limited analytical attention.

Mitigation measures are extensively listed, yet their **effectiveness remains largely unverifiable**. Baseline metrics, exposure diversity indicators, amplification rates, and counterfactual analysis are absent. Without measurable outcome indicators, proportionality and effectiveness under Article 35 cannot be independently evaluated. Recommender systems, although recognised as influencing factors under Article 34(2) DSA, remain the least assessable structural component of systemic risk.

Stakeholder engagement is frequently **referenced but not linked to demonstrable changes** in risk identification, severity scoring, or mitigation design. Governance structure is described in general terms, but not in enough detail to verify whether the relevant teams are sufficiently resourced to meet the foreseeable risks and challenges.

Overall, the second iteration **reflects a consolidation rather than a step in a learning process**. The enforcement approach, as currently implemented, risks consolidating a compliance-oriented model instead of incentivising redesign aligned with democratic resilience.

To address these shortcomings, this report recommends that platforms integrate structural design drivers into systemic risk analysis, broaden their understanding of civic discourse beyond election integrity, and disclose measurable indicators enabling independent verification of mitigation effectiveness. It further calls on the European Commission to clarify methodological expectations and use its supervisory powers where necessary, and on the European Board for Digital Services

to articulate clearer normative benchmarks in future reporting cycles.

Unless subsequent iterations incorporate measurable structural transparency and evaluative rigour, the **DSA's systemic risk framework will struggle to operate as an effective instrument of democratic risk governance.**

1. Introduction

The [Digital Services Act \(DSA\)](#) requires Very Large Online Platforms and Very Large Online Search Engines (VLOPSEs) to **identify, assess, and mitigate systemic risks** stemming from the design, functioning, and use of their services, including risks to civic discourse and electoral processes (Articles 34 and 35).

Following the publication of the first iteration of [risk assessment and mitigation reports](#) in November 2024, a second iteration was released one year later.¹ This development offers an important opportunity to evaluate how platforms conceptualise and address risks to democratic processes, as well as the extent to which **their approaches have evolved in response to regulatory scrutiny and civil society input.**

This report builds on our earlier analyses of the first published risk assessments (1, 2). In addition to reassessing the platforms and search engines analysed in our previous reports (Facebook,

Instagram, Google Search, YouTube, TikTok, and X), this report includes LinkedIn for the first time. Although frequently framed primarily as a professional networking service, LinkedIn has become an increasingly important space for political discourse, policy debate, advocacy, and mobilisation. Its growing function in shaping public narratives warrants closer scrutiny.

In what follows, we first summarise the main findings from our analysis of the first iteration of risk assessment and mitigation reports to establish a baseline against which developments in the second iteration can be assessed. We then reflect on the European Board for Digital Services' (hereinafter, the Board) assessment of the first iteration of reports to examine whether it establishes sufficiently clear standards and guidance for platforms. The report then presents our **cross-platform findings from the second iteration**, followed by platform-by-platform analyses. To enable structured evaluation, the analysis applies **four analytical benchmarks** derived directly from Articles 34 and 35 DSA: (1) Structural versus misuse framing of systemic risk, (2) Breadth of civic discourse conceptualisation, (3) Assessability and measurability of mitigation effectiveness, (4) Transparency of governance and stakeholder impact. The report concludes with **recommendations addressed to platforms, the European Commission, and the European Board for Digital Services.**

1 In some cases, the reports available for civil society scrutiny after November 2024 already constituted the second risk assessment reports produced by the platforms. In this report, however, the term "second iteration" is used to refer specifically to the set of reports made public in late 2025.

2. Findings from the first iteration of risk assessment reports

In last year's analysis, we identified several shortcomings that we believed warranted further action including, potentially, targeted guidance by the European Commission.

First, the reports varied significantly in **format, structure, and analytical logic**. While this diversity was initially understandable, given the absence of predefined guidance and the potential to help surface issues that a rigid template could have obscured, the lack of consistency ultimately limited comparability.

Most reports focused narrowly on **policy violations and intentional misuse** of services rather than addressing the broader platform-driven harms to the quality of democratic discourse.

With regard to **civic discourse** and electoral processes specifically, last year's analysis found that platforms' knowledge of these risks was often superficial and narrowly focused on elections, particularly disinformation. Many other dimensions identified in our prior [policy paper](#) *Identifying, Analysing, Assessing and Mitigating Potential Negative Effects On Civic Discourse And Electoral Processes* - such as political advertising, over-removal or shadow banning of political content, the role of influencers, inclusivity, incivility, echo chambers, polarisation, and conflict amplification - were largely overlooked. Additional issues, including organised campaigns targeting civil society, asymmetric amplification of political actors,

and misleading information about voting processes, were insufficiently addressed, leaving significant gaps in the overall risk analysis.

Another key concern related to the limited information provided on the **effectiveness of risk mitigation measures**. Although Article 35 of the DSA requires platforms to implement reasonable, proportionate, and effective mitigations, the reports offered little insight into how effectiveness was assessed, either in themselves or against alternatives, or into the measures' impact in practice. This lack of detail made it difficult to evaluate compliance and risked shifting the burden back to the Commission by requiring it to obtain information through requests for information under Article 67 of the DSA, consequently undermining the purpose of the reporting exercise. **Recommender systems** arose as another important gap. Despite their central role in shaping civic discourse through content selection and amplification, the reports provided only high-level descriptions of recommender systems, with minimal analysis of the risks they pose and the mitigation measures to address them. Expectations that the assessments would clarify how recommender systems influence civic discourse were largely unmet.

The analysis also found persistent gaps in **transparency regarding the teams** involved in risk assessment and mitigation. While platforms generally referenced relevant internal teams - often including those focused on civic integrity or elections - there was insufficient detail on team size, roles, responsibilities, and resourcing, making it difficult to assess whether these teams were sufficiently prepared to address the

identified risks. Similarly, **stakeholder consultation** was described broadly across reports, but evidence of substantive engagement with civil society remained limited. Consultations were often confined to a small number of multi-stakeholder workshops, with few instances of targeted or sustained engagement with civil society organisations working specifically on elections and civic discourse, even where such organisations had proactively sought involvement.

Overall, the **first iteration fared badly across all four benchmarks**. Structural drivers of risk were underexamined, civic discourse was narrowly conceptualised, mitigation effectiveness was largely unverifiable, and governance transparency and stakeholder involvement remained partial at best.

3. The Board report

The [first Article 35\(2\) DSA report by the European Board for Digital Services and the European Commission](#) (Board report), covering the first iteration of risk assessment reports, explicitly states that it is not intended to provide guidance on compliance with Articles 34 or 35 DSA, nor to constitute an assessment or evaluation of whether designated VLOPs and VLOSEs comply with those provisions or with the DSA more broadly. That is, it **deliberately refrains from articulating any normative expectations**, compliance benchmarks, or evaluative standards against which platform practices could be assessed. Instead, it provides an **overview of the most prominent and recurrent systemic risks** identified

by platforms themselves, researchers, and civil society organisations, and **summarises the mitigation practices currently in use**.

In relation to mitigation, this first edition focuses on cataloguing existing practices rather than assessing their effectiveness or adequacy. At the same time, the way platform and civil society contributions are presented collectively constructs an implicit narrative that closely aligns with platforms' own risk narratives, in which **systemic harms are ascribed primarily to bad actors**, while platform design choices are treated as largely neutral and vulnerable primarily to misuse.

This **framing** is especially evident in the section on civic discourse, electoral processes, and public security (pp. 18–23). There, risks are discussed predominantly in relation to disinformation, foreign information manipulation and interference, coordinated inauthentic behaviour, impersonation, and deepfakes. Although the report does not hide that some systemic risks may relate to platform design and amplification dynamics, the **analytical emphasis remains on harmful behaviour** rather than on platforms' responsibility for design choices that shape visibility, attention, and the quality of civic discourse.

While the cautious, descriptive approach is presented in the Board report as appropriate for the time being, stating that future editions may aim to identify evolving best practices in systemic risk mitigation, the presentation leaves, at best, the report's **function and added value unclear**. At worst, by explicitly refraining from articulating compliance benchmarks

or evaluative standards, it may also be read as **signalling a degree of regulatory patience**. In the absence of clearer normative expectations, platforms may interpret this posture as indicating that incremental procedural refinement is sufficient, rather than substantive structural improvement.

4. Methodology

To assess whether the second iteration reflects substantive progress, we evaluate each platform report along four interrelated benchmarks.

(1) Structural integration of design-related risks: This benchmark examines whether the platform meaningfully analyses how its own design choices contribute to systemic risks.

Key evaluation questions:

- Does the report assess recommender systems, ranking criteria, engagement optimisation, and amplification mechanisms as potential primary sources of systemic risk?
- Are monetisation structures or creator incentives examined as potential drivers of civic harm?
- Does the report consider how algorithmic design affects the visibility, reach, and exposure diversity of civic or political content?
- Are structural trade-offs (e.g. engagement versus discourse quality) explicitly acknowledged?

- Are design-related risks supported by empirical findings, rather than described only at a high level?

(2) Breadth of Civic Discourse Analysis: This benchmark assesses how comprehensively civic discourse is conceptualised.

Key evaluation questions:

- Is civic discourse treated as a continuous democratic infrastructure, or primarily as an election-period disinformation management field?
- Does the report address risks to pluralism, inclusivity, marginalisation of minority voices, and chilling effects?
- Are lawful but harmful dynamics (e.g. polarisation, selective exposure, asymmetric amplification) analysed?
- Does the platform examine over-enforcement, shadow banning, or enforcement errors affecting political actors or civil society?
- Are election risks embedded in broader discourse dynamics rather than treated as isolated events?

(3) Assessability of Mitigation Effectiveness: This benchmark examines whether mitigation measures can be independently evaluated.

Key evaluation questions:

- Are mitigation measures linked to clearly defined risk indicators?
- Are baseline metrics disclosed?
- Are measurable outcome indicators provided (e.g. exposure diversity, amplification rates, enforcement error rates)?
- Is counterfactual reasoning presented (why this mitigation rather than alternatives)?
- Are year-over-year changes explained through data rather than methodological refinements alone?

(4) Governance & Stakeholder Impact Transparency: This benchmark assesses whether internal structures and stakeholder processes are sufficiently transparent to evaluate accountability.

Key evaluation questions:

- Are the internal teams responsible for risk assessment identified with clarity regarding roles, expertise, and EU-specific resourcing?
- Is the independence of compliance functions described?
- Are stakeholder engagement processes documented beyond listing participation in events?
- Is there traceable evidence that stakeholder input influenced risk identification, severity scoring, or mitigation design?

5. Findings from the second iteration of risk assessment reports

5.1 Structural versus misuse framing

In the second iteration of reports, **systemic risks are** mainly attributed to “**bad actors**” across platforms. Design choices, engagement optimisation, and monetisation incentives are acknowledged in abstract terms but rarely examined as the main drivers of harm. Structural amplification mechanisms are treated as neutral infrastructures vulnerable to misuse rather than as risk-generating systems. This externalisation narrows accountability.

5.2 Conception of civic discourse

Civic discourse stays narrowly framed. Election integrity and disinformation dominate the analysis. Broader risks, such as risks to pluralism, the marginalisation of minority voices, selective exposure, chilling effects, asymmetrical amplification, and lawful but harmful civic degradation, are largely absent or marginal. A well-protected democratic civic discourse is not conceptualised as a background condition for the integrity of the electoral processes.

5.3 Mitigation effectiveness

Mitigation measures are extensively catalogued. However, **platforms do not disclose** their baseline metrics, do not present counterfactual analysis and provide no measurable outcome indicators. Without such **data**, proportionality

and effectiveness under Article 35 cannot be independently evaluated. Importantly, their recommender systems are described but not sufficiently evaluated. As indicated above, in the reports, design choices are predominantly treated as neutral infrastructure that hostile agents may misuse. Exposure diversity metrics, amplification rates for civic content, or polarisation **indicators are absent**. This leaves one of the central structural vectors insufficiently scrutinised.

5.4 Governance and stakeholder engagement

Platforms describe cross-functional teams and stakeholder engagement. However, they **do not quantify** EU-specific resourcing, do not disclose expertise distribution, and **provide no traceable evidence** that stakeholder input altered mitigation design. Thereby, engagement remains procedural rather than demonstrably substantive.

6. Platform-specific observations

Meta (Facebook & Instagram)

Meta continues to frame civic and electoral risks primarily in adversarial terms. While it formally acknowledges recommender systems as influencing factors under Article 34(2), structural analysis stays high-level and descriptive. Amplification dynamics are not empirically examined. The near-identical nature of Facebook and Instagram reports elicits concerns about service-specific due diligence. Instagram’s influencer-driven political dynamics and youth concentration are not meaningfully addressed. Mitigation measures are described extensively but remain disconnected from measurable outcome data. No exposure diversity metrics or amplification indicators are disclosed. Stakeholder engagement is frequently referenced but not linked to identifiable changes in mitigation design.

Benchmark	Assessment ²
Structural Integration	Weak
Civic Discourse Breadth	Weak
Mitigation Assessability	Very Weak
Governance & Stakeholder Transparency	Weak

² Benchmarks were evaluated on the following scale: Very weak=1 Weak=2, Limited=3, Strong=4, Very strong=5.

Google (Google Search & YouTube)

Google’s reporting logic remains heavily anchored in a misuse narrative. Recommender systems are acknowledged primarily to assert that they function safely. Search remains narrowly focused on election-related disinformation and on surfacing credible sources. Broader questions about amplification diversity, lawful yet harmful content dynamics, or systemic

information shaping remain unaddressed. YouTube recognises a wider set of civic risks, including voter suppression and harassment, yet analysis stays descriptive. Mitigation effectiveness is not externally assessable. Governance transparency is moderate compared to peers, with some visibility into internal teams, but without quantitative resourcing disclosure.

Benchmark	Assessment
Structural Integration	Weak
Civic Discourse Breadth	Limited
Mitigation Assessability	Weak
Governance & Stakeholder Transparency	Limited

LinkedIn

LinkedIn represents a partial departure from pure misuse framing. It explicitly considers whether platform design may worsen harm and gives a clearer description of feed logic. However, this analysis largely concludes that LinkedIn’s professional orientation mitigates

systemic risk. Civic discourse is not treated as a primary risk category, despite its growing political use. Mitigation effectiveness continues largely declarative. Stakeholder engagement is comparatively well-described, though impact traceability is limited.

Benchmark	Assessment
Structural Integration	Limited
Civic Discourse Breadth	Weak
Mitigation Assessability	Weak
Governance & Stakeholder Transparency	Limited

TikTok

TikTok provides a clearer description of recommender systems and acknowledges the risks of rapid amplification. However, no negative findings are disclosed, and no empirical study is provided. Civic discourse largely remains

confined to disinformation and election integrity. Influencer-driven political campaigning risks are underdeveloped. Stakeholder engagement is referenced but does not translate into visible analytical expansion.

Benchmark	Assessment
Structural Integration	Limited
Civic Discourse Breadth	Weak
Mitigation Assessability	Weak
Governance & Stakeholder Transparency	Weak

X

X's report is very well-structured and accessible. It explicitly acknowledges chilling effects and selective exposure risks more clearly than its peers, and generally, a broader set of risks. However, structural drivers remain secondary to misuse framing. Harms are often individualised rather than treated as systemic

democratic degradation. Mitigation effectiveness cannot be independently evaluated due to the absence of disclosed metrics. Governance structures are listed, but not quantified; stakeholder engagement is referenced but not sufficiently described.

Benchmark	Assessment
Structural Integration	Limited
Civic Discourse Breadth	Limited
Mitigation Assessability	Weak
Governance & Stakeholder Transparency	Weak

7. Recommendations

Recommendations to platforms

Platforms should:

- Evaluate engagement optimisation and amplification logics as primary structural risk drivers.
- Broaden civic discourse analysis beyond election integrity and disinformation.
- Disclose measurable effectiveness indicators, including exposure diversity metrics and amplification data.
- Provide counterfactual reasoning when selecting mitigation measures.
- Demonstrate traceable stakeholder impact on risk scoring and mitigation design.

Recommendations to the European Commission

The Commission should:

- Clarify methodological expectations and develop core indicators or minimum transparency requirements for effectiveness assessment.
- Use Article 67 powers strategically where reports lack evaluative data.
- Prioritise scrutiny of recommender systems as structural risk vectors.

Recommendations to the European Board for Digital Services

The Board should:

- Move beyond descriptive aggregation and articulate normative benchmarks.
- Address structural risk drivers explicitly in future Article 35(2) reports.
- Provide guidance on effectiveness measurement and on the quality of stakeholder engagement.

8. Conclusion

The second iteration demonstrates **limited substantive transformation**. Systemic risks continue to be externalised. Civic discourse stays narrowly conceived. Mitigation effectiveness is largely unverifiable. The current reporting model risks becoming a compliance ritual rather than what the DSA foresaw, a mechanism for democratic risk governance.

Contact

Civil Liberties Union for Europe

The Civil Liberties Union for Europe (Liberties) is a Berlin-based civil liberties group with 24 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.

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European Partnership for Democracy

The European Partnership for Democracy (EPD) is a network of democracy support organisations with a global remit to support democracy. Headquartered in Brussels, EPD's mission is to support democracy in Europe and around the world through the collective knowledge and capacities of European democracy support organisations.

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