

Report

on ANCOM's activity as digital services coordinator in the context of the 2025 presidential elections



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Executive summary	1
1. Introduction.....	3
2. Activities undertaken	4
3. The role of the relevant authorities in combating illegal content online in the electoral context	8
4. Public communication	9
5. Conclusions	10

Executive summary

As the national digital services coordinator, designated by Law no. 50/2024, the National Authority for Management and Regulation in Communications (*ANCOM* or *the Authority*) played a key role in the application of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a single market for digital services and amending Directive 2000/31/EC (Digital Services Act) in the context of the May 2025 presidential elections.

Main objectives

- Facilitating communication between national authorities and very large online platforms (VLOPs) & very large online search engines (VLOSEs);
- Supporting the electoral process through digital tools and interinstitutional cooperation;
- Raising awareness and information among political actors and all stakeholders involved in the electoral process, as well as citizens and civil society, on the application of the Digital Services Act in electoral context.

Key activities

- Mapping of *the relevant authorities* in the electoral context and their responsibilities;
- Facilitation of communication between national authorities and VLOPs & VLOSEs relevant to our country;
- Official information of VLOPs and VLOSEs with national relevance regarding the date of the elections, the duration of the electoral campaign, the electoral silence period, the applicable legal provisions governing the electoral process, as well as a set of key indicators relevant in electoral context, to be duly taken into account by the very large online platforms concerned;
- Organisation, with the support of the European Commission, of a pre-electoral roundtable with the participation of VLOPs and VLOSEs nationally relevant, the relevant national authorities, the civil society organisations, as well as academia, with the aim of understanding the role of entities involved in electoral context, as well as discussing the practical risk mitigation measures adopted by VLOPs and VLOSEs to ensure compliance with *the Commission's Guidelines to providers of very large online platforms and very large online search engines on mitigating systemic risks to electoral processes pursuant to Article 35(3) of Regulation (EU) 2022/2065* and adjustment to Romania-specific aspects in relation to presidential elections;
- Organisation of a table-top exercise with the participation of the European Commission, a representative of the Irish Digital Services Coordinator, nationally relevant VLOPs and VLOSEs, civil society organisations, academia and relevant national authorities, with the aim of testing response capacities and information exchange mechanisms, by simulating hypothetical scenarios in the electoral context;
- Organisation of bilateral meetings with platforms/relevant national authorities/civil society organisations;
- Publication of information on the application of the Digital Services Act in the electoral context (press releases, social media posts, etc.);
- Raising of awareness on the guidelines developed by the European Commission applicable in the electoral context:
 - ✓ *Commission Guidelines for very large online platform providers 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*¹;
 - ✓ *Code of conduct on disinformation*²;

¹ [Communication from the Commission – 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](#).

² [The Code of Conduct on Disinformation | Shaping Europe's digital future](#), but also at <https://disinfocode.eu/the-code>.

✓ *Code of Practice on Countering Illegal Hate Speech Online*³.

- Organisation of a meeting, together with the AEP, with the representatives of the candidates to the President of Romania;
- Development of a digital tool for coordinated and effective reporting of illegal content or content that violates the terms and conditions of the platforms;
- Ensuring, with the support of the European Commission, of the activation, before the elections, of the rapid response system provided for in *the Code of Conduct on Disinformation* and understanding the role of the entities participating in it (VLOPs and VLOSEs signatories, EDMO, relevant civil society organisations and fact-checking entities, etc.);
- Participation in the inter-institutional task-force set up by the Prime Minister's Chancellery, within which a series of measures aimed at strengthening coordination between public authorities in the electoral context were discussed.

³ [The Code of conduct on countering illegal hate speech online + | Shaping Europe's digital future](#)

1. Introduction

This report presents the relevant steps taken by ANCOM for the implementation of the Digital Services Act and Law no. 50/2024⁴, in the context of the 2025 presidential elections in Romania.

The role of ANCOM – the digital services coordinator in the context of the Digital Services Act – is to ensure compliance with obligations therein by the *intermediary service providers in Romania*⁵, in terms of ensuring that the organisation and actions of the online platforms in Romania are compliant with the requirements of the Digital Services Act, as well as to provide assistance (constant and consistent support) to any stakeholders – service recipients, public authorities or institutions, civil society, other stakeholders – in understanding the concepts and mechanisms of the Digital Services Act and to formulate recommendations (through direct bilateral communications, multi-party roundtables, letters, presentations, communications, etc.).

The Digital Services Act does not define what is considered illegal content, this should be comprised in the national legislation in each field of activity (e.g. electoral field, consumer protection field, audiovisual field, personal data protection field, public order and safety, etc.). Therefore, the responsibility for taking the necessary measures to combat online illegal content lies with the Romanian state authorities and institutions in the areas of activity they manage (*relevant authorities within the meaning of Law no. 50/2024*),⁶ and not with the digital services coordinator.

Very large online platforms and very large search engines (e.g. Meta, TikTok, Google, X, etc.), respectively those that have an average monthly number of active recipients of services in the European Union greater than or equal to 45 million, are under the direct and exclusive supervision of the European Commission, according to art. 56 para. (2) of the Digital Services Act, with regard to the obligations of Chapter III Section 5 (Articles 33 to 43) of the same European legislative act. For the other responsibilities incumbent on large platforms/very large search engines according to the Regulation, the competence to supervise their fulfilment is shared between the European Commission and the digital services coordinator of the country where the platform or search engine has its headquarters or the designated legal representative, in the case of those relevant to our country being the Coimisiun na Mean (CnaM - digital services coordinator of Ireland).

The Digital Services Act is not a panacea for solving all aspects related to digital services at the level of a society, and effective cooperation at national level can only be ensured by all actors involved acting in good faith.

⁴ Law no. 50 of 18 March 2024 on the establishment of measures for the application of Regulation (EU) 2022/2.065 of the European Parliament and of the Council of 19 October 2022 on a single market for digital services and amending Directive 2000/31/EC (Digital Services Act), as well as amending and supplementing Law no. 365/2002 on e-commerce.

⁵ Art. 4 para. (1) letter d) of Law no. 50/2024.

⁶ Art. 4 para. (1) letter a) of Law no. 50/2024.

2. Activities undertaken

Understanding its role in the context of the Digital Services Act, the Authority acted pro-actively to support the creation of the necessary framework for the conduct in good conditions of the 2025 presidential elections.

In exercising our role, we have in particular considered the activities in the *Elections Toolbox for Digital Services Coordinators*⁷ developed by the European Board for Digital Services⁸ and the European Commission and adopted in February 2025. This document was intended to support Member States' Digital Services Coordinators in their contribution to protecting the integrity of electoral processes, by indicating activities that could be carried out by them in the electoral context in compliance with the national rules in force that establish different responsibilities for other national authorities.

At the same time, in the context of the *Commission's 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*, ANCOM aimed to facilitate the communication of the relevant authorities with representatives of very large online platforms or very large search engines relevant to the national territory, but also with other stakeholders, such as representatives of civil society, journalists or other professional organizations.

As early as January 2025, an important step made by ANCOM in support of relevant national authorities was to facilitate the creation of reporting channels to VLOPs and VLOSEs with national relevance.

Within **the framework of institutional cooperation** for the preparation of elections, we can recall:

- 07.02.2025 – Hybrid seminar with NGOs and authorities (AEP) at ANCOM headquarters
Purpose: Developing cooperation in the context of the DSA and preparing for presidential elections.
- 03.03.2025 – Round table (hybrid)
Goal: understand the roles of the actors involved in the elections.
- 04.03.2025 – Multilateral meeting with one of the very large online platforms and national authorities
Purpose: understand the reporting process.
- 01.04.2025 – Seminar with the representatives of the candidates to the President of Romania
Purpose: presentation of the DSA and the role of ANCOM.
- 03.04.2025 – Multilateral meeting with national authorities
Purpose: present the application link radar.ancom.ro.

Within **the dialogue with the very large online platforms (VLOPs)** we can mention bilateral meetings with some online platforms relevant to our country, in which we touched upon aspects such as:

- ✓ *establishing communication channels, preparing the round table and the table-top exercise;*
- ✓ *establishing direct communication channels and discussing relevant issues from the perspective of the Digital Services Act in the electoral context;*
- ✓ *technical and legal issues regarding illegal content;*

⁷ [DSA Elections Toolkit for Digital Services Coordinators | Shaping Europe's digital future](#)

⁸ The European Digital Services Board is an independent advisory group established under Article 61 of the Digital Services Act

- ✓ *raising awareness on the electoral silence period and reactions to the requests of the BEC;*
- ✓ *discussing suspicions of inauthentic behaviours.*

In preparation for the elections, ANCOM organized, on 27.03.2025, an exercise aimed at testing the response capacity in electoral context and understanding the role of the relevant national authorities.

As part of the activities regarding the **information of the public and the press**, we can mention:

- 03.03.2025 – Seminar with press representatives at ANCOM headquarters

Purpose: information on the role of ANCOM and of the other authorities in the electoral context.

- 31.03.2025 – Letter to advertisers

Purpose: prevent disinformation and non-compliant political advertising.

The Authority also communicated with the civil society active in the electoral field.

In addition to the activities mentioned above, we also mention the following:

In February 2025, ANCOM sent a letter to the two Chambers of the Romanian Parliament containing explanations on the relevance of the Regulation on digital services in the electoral context, the role of online platforms and online search engines in shaping public opinion and voter behaviour, the phenomena⁹ involving online platforms and online search engines that pose increased risks to the integrity of elections, as well as the systemic risks to electoral processes that may manifest themselves.

ANCOM presented in summary and attached to the letter the three¹⁰ documents relevant in electoral context, documents that should become a benchmark for participants holding different roles in the electoral context and recommended their dissemination to the members of the Parliament. At the same time, the Authority formulated a series of concrete recommendations for political actors:

- Transparency of online campaigns and compliance with the rules on online political advertising: All election materials distributed on digital platforms must be clearly labelled and comply with the terms of use of the platforms;
- Collaboration with digital platforms: Political actors are encouraged to maintain an open dialogue with digital service providers to report irregularities and better understand their policies on electoral content;
- Education of campaign teams: It is recommended to train campaign staff on the responsible use of digital platforms, on recognising and combating disinformation and information manipulation, and on recognising and combating hate speech;
- Ensuring responsible public discourse – Avoiding the promotion of messages that can contribute to polarization and hatred in society;
- Working with authorities and digital platforms – Timely reporting of illegal content and supporting efforts to prevent the spread, amplification and normalisation of illegal hate speech online;
- Awareness - dissemination and appropriation of documents and rules of conduct by all participants with different roles in the electoral context will contribute to ensuring a fair electoral process, protecting the integrity of public debate and maintaining citizens' trust in democracy.

⁹ the proliferation of illegal hate speech online, threats related to foreign information manipulation and interference ('FIMI'), the wider phenomenon of disinformation, the spread of extremist (violent) content for the purpose of radicalisation, as well as the spread of content generated by new technologies.

¹⁰ European Commission Guidelines for Very Large Online Platform Providers 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; Code of Conduct on Disinformation; Code of Practice on Countering Illegal Hate Speech Online+.

Also in February 2025, in the same context of the organization of the elections, but also in the context of the disinformation phenomenon that was taking shape around this electoral event, ANCOM asked the European Commission to activate the Rapid Response System (RRS), provided for in *the Code of Conduct on Disinformation*¹¹, for the 2025 presidential elections. We emphasize, however, that public authorities are not part of the RRS.

Between January and February 2025, ANCOM representatives were part of the working group set up by the Permanent Electoral Authority for the development of a methodology for the implementation of the provisions of the Government Emergency Ordinance no. 1/2025 on political advertising.

In March 2025, ANCOM sent official letters to some of the major online platforms relevant to our country¹², with information regarding: the date of the elections, the duration of the electoral campaign, the period of electoral silence, information on the applicable legislative provisions, but also a series of indicators that were considered relevant by ANCOM in the electoral context and that had to be taken into account, in its view, by the very large relevant online platforms.

During the entire period of the electoral process for the presidential elections (March 17 – May 24), taking into account the provisions of art. 2 para. (2) of the Government Emergency Ordinance no. 1/2025, ANCOM has appointed representatives within the auxiliary technical staff of the Central Electoral Bureau.

ANCOM has facilitated the use by the relevant national authorities in electoral context of digital tools¹³ designed to support their activity or rapid communication between the actors involved in the process.

ANCOM, in its capacity as digital services coordinator in Romania, has constantly cooperated with the European Commission and with the coordinators of digital services in other Member States, providing objective responses to requests for information submitted within the system established under art. 85 of the Digital Services Act. ANCOM has submitted to the European Commission all communications carried out in relation to some of the major online platforms.

On another line of activity and in consideration of the role of coordinator of digital services established by Law no. 50/2024, ANCOM pursued permanent dialogue with the other state authorities, including those involved in the electoral process – BEC, AEP, CNA, MAI, MAE. The dialogue continued in a small working group between representatives of ANCOM, AEP, DNSC and the Ministry of Internal Affairs, a group that organized working meetings whenever necessary (sometimes daily) in order to analyse the issues reported to the BEC through complaints addressed to it and which, however, were not within its competence.

One of the activities carried out within ANCOM in the electoral context, but in connection with the application of the provisions of the Digital Services Act, concerns the resolution of complaints alleging violation of the European legislative act.

Since the beginning of the electoral campaign, ANCOM has received a series of petitions with an electoral component, through which the petitioners complained about alleged violations of the Digital Services Act. It should be noted that 12 of them were received from candidates, their representatives or political parties. A timely response was provided to each of them.

Where the complaints submitted to ANCOM concerned *illegal content* present on very large online platforms and requests for the removal of that illegal content, ANCOM redirected the complaints to the Central Electoral Bureau, in accordance with the powers established by art. 17 of Government Emergency Ordinance no. 1/2025. At the same time, ANCOM sent the petitioners replies with detailed explanations regarding the limits of its competences in the field of digital services, as well as

⁷ <https://disinfocode.eu/>

¹² Google, LinkedIn, Meta, Microsoft, Snapchat, TikTok, X (formerly Twitter)

¹³ For example: *Linkradar*, *NextCloud*.

descriptions of the mechanisms established by the Digital Services Regulation, potentially applicable in the situations described by them.

In the case of complaints concerning suspicions of inauthentic use or automated exploitation of the services of very large online platforms, ANCOM has generally acted as follows:

- where there were uncertainties or considered that the petitioners could have additional information, ANCOM asked them for data and possible evidence regarding the conduct of very large online platforms;
- ANCOM asked the providers of very online platforms for points of view on the reported situations or, as the case may be, to start internal investigations and ensured that there are direct reporting channels between the candidates or their representatives and the very large online platforms relevant in Romania;
- ANCOM informed the European Commission at each stage;
- ANCOM was in contact with the providers of the very large online platforms involved to find out the latest available information on the reported situations;
- when it had concrete data from the providers of the very large online platforms, ANCOM promptly informed the petitioners.

It should be noted that, in certain situations, as a result of the information available in the public space, ANCOM started discussions with the providers of the very large online platforms before receiving complaints concerning the same subject.

3. The role of the relevant authorities in combating illegal content online in the electoral context

As we have already shown above in this report, ANCOM's role as coordinator of digital services at national level does not include activities such as identifying the content provider, removing illegal content that may be present in the online environment or qualifying that information as illegal content, these duties being the prerogative of the relevant authorities, i.e. public authorities and institutions or judicial authorities.

This clarification remains applicable also in the electoral context, a context in which there is the possibility of amplifying certain messages and behaviours in the online environment, these authorities and institutions being complemented, during the 2025 presidential elections, by the Central Electoral Bureau and its subordinated units according to the law.

4. Public communication

In the context of the May 2025 presidential elections and beyond, in its capacity as coordinator for digital services in Romania, one of ANCOM's priorities was to inform both political actors and parties involved in this process, as well as citizens and civil society about the application of the Regulation.

Thus, between February 1 and May 18, 2025, the Authority used all the communication channels at its disposal to disseminate information on this subject, as follows:

a) Relationship with the mass-media:

- Sending out of 20 press releases (can be accessed here - https://www.ancom.ro/comunicate-de-presa-dsa_7526)
- Organization of a dedicated seminar for the media representatives
- interviews and clarifications given to national and international media

b) Online campaign

According to the online campaign that ANCOM planned to run by the end of 2025, between April and May, the Authority promoted 4 sets of messages, 2 of which focused exclusively on the phenomenon of disinformation.

The 4 messages were promoted as follows:

- Facebook and LinkedIn Sponsored Video Posts (4 video posts)
- Facebook Ads – 4 sets
- Youtube Ads (Google Ads) – 4 sets
- Google Display Network (banners) – 4 sets (17 formats/set)

c) Posts on Facebook, LinkedIn, X, YouTube:

- 28 posts on Facebook
- 22 posts on LinkedIn
- 7 posts on X
- 4 videos published on YouTube

Also, as a result of the information provided within *the Interinstitutional Working Group for the implementation of the Plan for the implementation of the National Strategy for Strategic Communication and Combating Disinformation*, ANCOM redistributed on its own social media channels the denials issued by other public authorities regarding various false information that appeared in the public space, contributing significantly to the effort to combat disinformation.

At the same time, ANCOM representatives participated in a multitude of public events (conferences, seminars, debates, etc.), organized by various public or private entities (NGOs, education institutions, ministries) to inform stakeholders about the provisions of the Digital Services Act in the electoral context.

ANCOM's website has been constantly updated with relevant information, and the section dedicated to end-users (<https://infocentru.ancom.ro/en/>) has been enriched with a page dedicated to the phenomenon of disinformation.

5. Conclusions

From a legal standpoint, the Digital Services Act does not assign an express role to digital services coordinators in the electoral context. However, a series of provisions¹⁴ of the Regulation may be relevant for protecting the integrity of the electoral process, such as those regarding the transparency of online advertising, the mitigation of systemic risks generated by the use of digital platforms in electoral contexts, the risks associated with the dissemination of illegal or manipulative content that may affect the proper conduct of elections, voluntary codes of conduct.

At the same time, the activities carried out by ANCOM, as presented in this report, took into account *the European Commission's Guidelines for very large online platform providers 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*¹⁵ and the *Elections Toolbox for digital services coordinators*¹⁶.

As a result of the activities carried out, our institution is able to formulate the following recommendations:

1. Improve inter-institutional communication and responsiveness in situations of common interest;
2. Adopt concrete measures to support all *relevant authorities*, in particular those considered essential in relevant areas, in accelerating the digitalisation process, so that they can use advanced technical solutions, developed in an integrated manner, which automate several repetitive administrative processes in certain contexts in order to manage a large volume of data and achieve increased operational efficiency, reduction of resource consumption, traceability, accessibility and transparency;
3. Adapting national legislation, including in the context of European legislation adopted in recent years (e.g. Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising, Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 300/2008, (EU) No 167/2013, (EU) No 2024/2008). 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act));
4. Providing training for staff in the relevant national authorities to acquire skills to take action against illegal content in the areas they manage according to the law;
5. Stepping up communication efforts on the specific roles of the European Commission, Digital Services Coordinators, relevant authorities and civil society in the context of the Digital Services Act, for a better understanding by all parties involved of the mechanisms established by the Digital Services Act.
6. Developing societal resilience to disinformation and manipulative content, by raising awareness of the negative effects of disinformation, foreign interference and information manipulation actions, by promoting public policy approaches aimed at strengthening this resilience, in particular in the areas of media literacy, digital literacy, youth, the role of arts and culture, and by facilitating the development of coherent and integrated national strategies. Efforts to reduce citizens' susceptibility to disinformation must include training programmes to help the public distinguish between real and false information, identify sources of trust and strengthen their critical thinking. It is also necessary to support the independent press, without omitting other mechanisms referred to in the existing toolkit in the second report¹⁷ of the European External Action Service.

¹⁴ Articles 9, 10, 16, 22, 26, 34, 35, 42 and 45 of the Digital Services Act

¹⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52024XC03014&qid=1714466886277>

¹⁶ <https://digital-strategy.ec.europa.eu/en/library/dsa-elections-toolkit-digital-services-coordinators>

¹⁷ [EEAS-2nd-Report on FIMI Threats-January-2024_0.pdf](#).



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