

Exhibit 277



Roundtable on Elections in the Context of the Digital Services Act - September 15, 2022

Part I: online platforms and government bodies only		
Time	Themes	Subjects
12:30 – 13:00	Walk-in	Sandwiches will be available for participants who may not have the opportunity to have lunch beforehand.
13:00 – 13:05	Welcome by David Korteweg (ACM)	<ul style="list-style-type: none"> - Agenda - Houserules
13:05 – 13:25	Presentation by the European Commission	<ul style="list-style-type: none"> - The role of the DSA in the electoral process - Election Guidelines - Code of Practice on Disinformation - TTPA
13:25 – 14:00	Overview of Dutch context	<ul style="list-style-type: none"> - Landscape of Dutch election process and (government) actors – <i>Ministry of the Interior and Kingdom Relations</i> - TTPA – <i>Dutch Data Protection Authority & Dutch Media Authority</i>
14:00 – 14:15	Measures for politicians/political parties	<ul style="list-style-type: none"> - Threats against politicians - Contact point/action perspective for political parties/politicians - AI generated information about candidates and political parties
14:15 – 14:30	Break	
Part II: online platforms, government bodies, civil society, academics		
14:30 – 14:35	Opening by Manon Leijten (Board Member of the ACM)	
14:35 – 15:05	Synthetic content: political issues and election information	<ul style="list-style-type: none"> - <i>Introduction by external speaker</i> - Synthetic content about political issues - Chatbots/AI: responses about parties, politicians and elections
15:05 – 15:35	Recommender systems	<ul style="list-style-type: none"> - <i>Introduction by external speaker</i> - How content is prioritized - System abuse
15:35 – 16:05	Access to publicly available data for researchers	<ul style="list-style-type: none"> - <i>Introduction by external speaker</i> - Access pursuant to Art. 40(12) DSA: experiences and obstacles
16:05 – 16:20	Break	
16:20 – 16:50	Virality	<ul style="list-style-type: none"> - <i>Introduction by external speaker</i> - Timely detection and intervention of harmful content - Cross-platform distribution
16:50 – 17:20	Open discussion	<ul style="list-style-type: none"> - What structural improvements are needed before the elections? - What is needed from the ACM/DSCs? - Collaboration between researchers and platforms
17:20	Networking drinks	

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SUMMARY

On September 15, the Netherlands Authority for Consumers and Markets (ACM) organized a roundtable discussion on the responsibilities of online platforms under the European Digital Services Act (DSA) during elections. During the meeting, major online platforms, civil society organizations, researchers, and relevant authorities discussed this topic. The goal of the meeting was to exchange knowledge about the relevant legislation, each party's role, and the experiences of academic experts. The roundtable discussion is part of a standard roadmap developed at the European level. Apart from the ACM and invited VLOPs and VLOSEs, attendees included the European Commission, the Dutch government, civil society organizations and academia.

Meeting summary

The meeting focused on four issues:

- deepfakes created on platforms like Instagram, X and Tiktok
- promotion of hatespeech and misinformation (incl harassment of politicians/journalists)
- fact-checking and community notes lack of effectiveness in virality
- Slowness in content removal rate when requested to do so

The EU Commission briefing on the Digital Services Act (DSA) and elections focused on how the DSA helps safeguard electoral integrity by requiring platforms to mitigate systemic risks like disinformation and threats to civil discourse. Over the past two years, the Commission has developed guidelines and an Election Toolkit to support compliance, especially for Very Large Online Platforms (VLOPs). National authorities retain control over elections, but collaboration is key—fact-checkers and EDMO hubs play a role in rapid response systems, while a new political advertising transparency regulation (effective October 10th, but EU guidelines not in place yet) will require sponsor disclosure without regulating ad-content. Discussions also covered harassment of journalists and politicians, the impact of AI-generated content and deepfakes, challenges in accessing platform data for research, and the limited effectiveness of current tools like fact-checking and community notes in curbing viral misinformation. Finally, an interesting mention was made on the interlink between the ‘Dutchification of politics’ (the Dutch political system can lead to political fragmentation, electoral volatility and the rise of niche parties. In the 2023 elections 26 parties participated, of which 15 parties ended up in parliament) and the expected increased use of AI chatbots to differ between a variety of political parties on the left, or right end of the spectrum.

ACM published a high-level summary of the Roundtable on their website: [Verslag rondetafelgesprek over verantwoordelijkheden online platforms in verkiezingstijd | ACM](#)

FURTHER DETAILED NOTES

EU commission intro on DSA

- **Focus:** How the DSA interacts with elections, systemic risk mitigation, and civil discourse.
- **Key Tools:**
 - **Election Toolkit:** Developed by the Commission and Digital Services Board to guide relevant actors.
 - **Rapid Response System:** Enables fact-checkers to flag harmful content to platforms.
 - **EDMO:** Network of fact-checkers across EU (e.g., NL hub).

Political Advertising Regulation

- **New Regulation:** Enters into force on **Oct 10**.
- **Goals:** Transparency in political ads (e.g., sponsor details), resilience of political systems. On prior elections they were in touch with SOME platforms to ask them to review message -- election flagger status.
- **Scope:** Online and offline ads; does **not** regulate ad content.
- **Transparency Labels:** Required since **July 9**.

NL Dutch National Context

- **Ministry of Interior:** Legal framework, voting process, and election interference.
- **Election Flagger:** Informal status used to request content review from platforms.
- **Dutch Media Authority:** Monitoring and notification role.
- **Dutch Data Protection Authority:** Supervises GDPR and recommender system transparency.

Harassment & Threats to Politicians and Journalists

- **Findings:**
 - 80% of female journalists received threats; 25% reported mental health impact.
 - 53% of female politicians experienced harassment.
- **Questions Raised:**
 - Do these groups need special escalation channels?
 - Can these be shared with candidates?

AI-Generated Content & Deepfakes

- **Valentina Golunova (Univ. Maastricht):**
 - Deepfakes can violate GDPR and electoral integrity.
 - Governed by EU law, national law, and platform policies.
 - DSA Articles: 9, 16, 22, 34–37; AI Act: Article 50(2)(4) (labeling by Aug 2026).
- **Platform Examples:**
 - **X:** Prohibits deepfakes but doesn't remove them.
 - **Meta:** Oversight board recommends removal, not enforced.
 - **TikTok:** Deepfakes not labeled.

Recommender Systems & Content Moderation

- **Concerns:**

- Promotion of harmful content (e.g., fascism, stereotypes).
- Lack of user control over feed (e.g., chronological order).
- **Speakers:** Bits of Freedom, Post X Society, TikTok, Univ. of Amsterdam.
- **Need for Collaboration:** CSOs, academia, and governments must work together.

Data Access for Researchers

- **Article 40(12):** Access to public data.
- **Article 40(4):** Future access to non-public data.
- **Challenges:** Platform approval rates low; Meta’s CrowdTangle shutdown impact.
- **Outlook:** Need for timely, accurate, and useful data access.

Virality & Misinformation

- **Univ. Amsterdam:**
 - Fact-checkers vs. Community Notes: Both ineffective at reducing virality.
 - Community Notes: Only 10% published; not active in EU.
 - Wikimedia: Believes in user self-regulation.

Monitoring & Enforcement

- **INACH CSO:**
 - Tracks platform response to harmful content.
 - Compares removal rates between regular users and trusted partners.
 - Ongoing monitoring since 2016.

Open Questions & Challenges

- Experience with DSA Transparency Database.
- Role of platforms in countering hate speech and threats.
- Journalist protection and cybersecurity training.
- Timing and readiness for deepfake interventions.

Participants:

Alphabet
Autoriteit Persoonsgegevens (Dutch Data Protection Authority)
Bits of Freedom
Coimisiún na Meán (Ireland’s media regulator)
Council of State (Raad van State)
DG CNECT and DG JUST (European Commission)
Discord
Dutch Media Authority (Commissariat van de Media)
INACH
Institute for Information Law (IVIR) (UvA)
Justice for prosperity
LinkedIn
Maastricht University
Media Studies (University of Amsterdam)
Meta
Microsoft
Ministry of the Interior and Kingdom Relations
Nieuwscheckers
Post X Society / Democratie Monitor
Radboud University
Shapchat
Tiktok
Wikimedia Foundation
Wikimedia Nederland
X