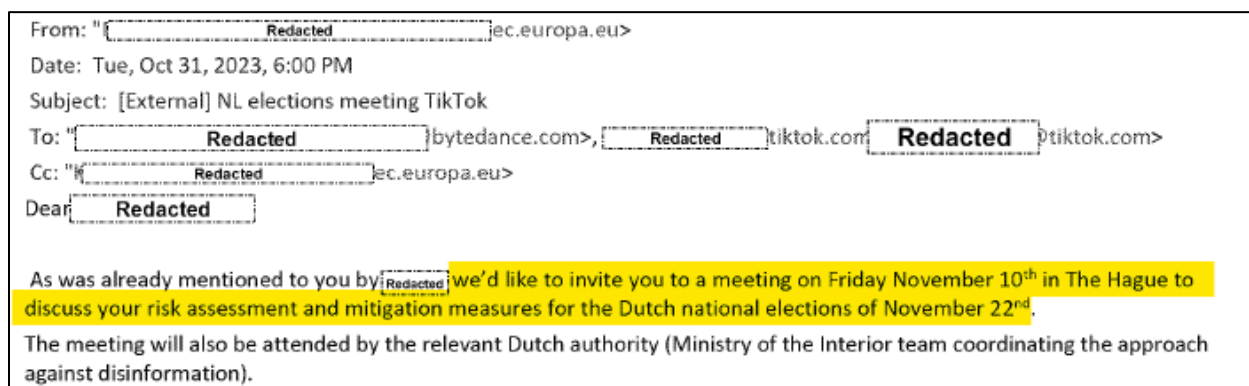


1. The Netherlands (2023 and 2025)

The Netherlands had parliamentary elections in 2023 and 2025. Both times, the European Commission encouraged platforms to censor additional content. Ahead of the 2023 Dutch election, the European Commission hosted a meeting with TikTok “to discuss [its] risk assessment and mitigation measures for the Dutch national elections,” including “measures to mitigate the risk of mis/disinformation for these particular elections.”⁴²⁹ This meeting offered the European Commission a forum to put censorship pressure on the platform. Before this election, the European Commission also made the Dutch Interior Ministry a “trusted flagger” entitled to make priority censorship requests under the DSA.⁴³⁰ This is an obvious conflict of interest: ahead of an election where Dutch voters could have voted the Interior Ministry’s leadership out of power, the European Commission specifically empowered the Interior Ministry to make special censorship demands.



The European Commission summoned TikTok to a meeting about its censorship measures ahead of the 2023 Dutch election.

The Dutch competition regulator, the Authority for Consumers and Markets (ACM), held a similar meeting ahead of the 2025 Dutch parliamentary election. Six weeks before Election Day, ACM held a “roundtable on elections in the context of the Digital Services Act” with European Commission regulators, companies including Alphabet, Meta, Microsoft, TikTok, and X, and censorious NGOs.⁴³¹ ACM and the European Commission asked platforms about “how content is prioritized” in algorithms, existing steps to censor “harmful content,” and “what structural improvements”—meaning additional censorship measures—were “needed before the elections[.]”⁴³² ACM and the European Commission clearly expected platforms to take significant censorship steps ahead of the election.

⁴²⁹ Emails between TikTok staff and European Commission staff (Nov. 6, 2023), *see* Ex. 230.

⁴³⁰ *Non-Paper: TikTok's approach to election preparedness across the EU* (Nov. 8, 2023), *see* Ex. 231; *see* Digital Services Act, *supra* note 26, Art. 22.

⁴³¹ Agenda for *Roundtable on Elections in the Context of the Digital Services Act* (Sep. 15, 2025), *see* Ex. 277; Email from Dutch regulators to platforms (Sep. 3, 2025), *see* Ex. 276.

⁴³² Agenda for *Roundtable on Elections in the Context of the Digital Services Act* (Sep. 15, 2025), *see* Ex. 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

The European Commission and Dutch authorities pressured platforms to take additional censorship steps ahead of the 2025 Dutch election.

2. European Parliament (2024)

Elections for the European Parliament, the legislature of the European Union, took place from June 6 to 9, 2024. In this case, the European Commission’s pre-election censorship campaign was particularly problematic because of an inherent conflict of interest: the European Parliament elects the President of the European Commission and confirms the European Commissioners.