











DSA REPORT CARD

FILE NAME: AI ACT 2021/0106(COD) AND THE DIGITAL SERVICES ACT

NOTE: *Current positions on the proposed AI Act risk severely undermining and contrasting with the DSA on several aspects such as on systemic risk mitigation and recommender systems*

SUBJECT	SCORE
BAN ON GENERAL MONITORING	
COUNTRY OF ORIGIN PRINCIPLE	
INTERMEDIARY LIABILITY REGIME	
TRANSPARENCY REPORTING OBLIGATIONS	
ADVERTISING, NOTICE AND ACTION MECHANISM, STATEMENT OF REASONS	
RECOMMENDER SYSTEMS	
SYSTEMIC RISK MITIGATION	
INTERNAL COMPLAINT-HANDLING SYSTEM	
OUT-OF-COURT DISPUTE SETTLEMENT	
DEFINITION OF VLOP	

LET THE DSA UNFOLD!

SUBJECT

MOTIVATION

TRANSPARENCY REPORTING OBLIGATION	THE INCLUSION OF RECOMMENDER SYSTEMS (AS PER BELOW) WOULD SUBJECT PROVIDERS OF ONLINE PLATFORMS TO OVERLAPPING TRANSPARENCY REPORTING OBLIGATIONS IN THE TWO PIECES OF LEGISLATION
RECOMMENDER SYSTEMS	BRINGING VLOP RECOMMENDER SYSTEMS INTO ANNEX III WOULD CREATE STRONG OVERLAP WITH RELEVANT EXISTING PROVISIONS UNDER THE DSA, INCLUDING THOSE ON MANDATED RISK ASSESSMENTS, RISKS FOR FUNDAMENTAL RIGHTS, TRANSPARENCY INFORMATION, USER INFORMATION ON TRAINING DATA AND TRANSPARENCY PROVISIONS ON CONTENT MODERATION.
SYSTEMIC RISK MITIGATION MEASURES	THE INCLUSION OF RECOMMENDER SYSTEMS (AS PER ABOVE) WOULD SUBJECT PROVIDERS OF ONLINE PLATFORMS TO OVERLAPPING TRANSPARENCY REPORTING OBLIGATIONS IN THE TWO PIECES OF LEGISLATION
INTERNAL COMPLAINT HANDLING	THE EP POSITION (NEW ARTICLE 84 A) OBLIGES DEPLOYERS TO PROVIDE FOR AN INTERNAL COMPLAINT-HANDLING SYSTEM

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