

# Challenges of implementation of the regulation on political advertising

## KEY FINDINGS

The digitalisation of political campaigning has made transparency in political advertising essential for electoral integrity. The Regulation on the Targeting and Transparency of Political Advertising (TTPA) – the EU’s main regulatory response – introduces harmonised transparency obligations and limits on targeting and ad-delivery techniques.

A first challenge in implementing the Regulation concerns the definition of political advertising, especially the treatment of issue-based advertising. The breadth of the definition creates legal uncertainty and risks incentivising risk-avoidance strategies by major platforms and search engines.

A second challenge lies in the TTPA’s interaction with the Digital Services Act (DSA) and the Artificial Intelligence (AI) Act. While they are broadly complementary, overlaps in platform obligations and enforcement structures may create confusion and fragmented supervision. Further guidance is needed to ensure coherence across the EU digital rulebook.

A third challenge is the timely and effective establishment of the European repository for online political advertisements. The repository is central to public scrutiny and research, especially after some major platforms limited or discontinued political advertising archives in the EU. If implementation is delayed or incomplete, a significant transparency gap will remain.

A fourth challenge concerns supervision and enforcement. The TTPA relies on multiple competent authorities, while leaving Member States considerable discretion in institutional design and sanctions. Without strong coordination, implementation may become uneven across the Union.

A fifth challenge concerns the role of influencers. Although the TTPA applies to influencers, uncertainties remain regarding their classification and the obligations applicable to them. In the short term, guidance should facilitate compliance; in the longer term, a clearer framework may be needed.

The effective impact of the TTPA depends on whether the EU can implement it consistently, close emerging transparency gaps and avoid fragmented enforcement.



## Democracy and the digitalisation of political advertising<sup>1</sup>

These are challenging times for democracy in general, and for democracy in the European Union (EU) specifically. As President von der Leyen remarked in her 2025 State of the Union speech: “Our democracy is under attack. The rise in information manipulation and disinformation is dividing our societies. It is not only eroding trust in the truth – but also in democracy itself”.<sup>2</sup> Threats to democracy originate both from outside and from within the Union and are often interlinked. A particularly severe challenge comes from disinformation and Foreign Information Manipulation and Interference (FIMI). According to the survey of the World Economic Forum, business leaders rank them among the major short-term risks.<sup>3</sup> As the High Representative and Commission’s Vice-President Kaja Kallas noted in her introductory remarks to the 4<sup>th</sup> Report on FIMI Threats of the EEAS: “Today’s wars are not only fought with tanks and drones but with lies and algorithms too. The information space is a frontline in the fight for democracy”.<sup>4</sup>

The EU has not remained passive and, in the last decade or so, has developed a broad spectrum of tools of different nature – from legislation to soft law instruments and financial programmes – to enhance its capacity to respond to such challenges. Over time, the approach has developed from being mainly reactive to external threats, with a specific focus on the Eastern Neighbourhood, towards building the capabilities to proactively foresee and seek to anticipate crises. The Commission’s 2025 Foresight Report labels the latter approach “resilience 2.0”.<sup>5</sup> Already in 2020, in its European Democracy Action Plan (EDAP), the European Commission stressed that democracy should not be taken for granted, but it requires being “actively nurtured and defended”.<sup>6</sup> In the 2023 Defence of Democracy (DoD) package and, most recently, the European Democracy Shield (EDS), such an approach has been expanded and developed further.

Protecting democracy requires, by necessity, guaranteeing the integrity of elections. Even in the most established democratic systems, electoral institutions remain exposed to a multiplicity of threats, linked to both foreign interferences and domestic manipulation, particularly given the new challenges posed by the digital transformation. If the expansion of the online political sphere may also be conducive to a more inclusive idea of democracy – for instance, involving citizens who would otherwise remain distant from politics – it is established that the use of online tools also bears significant negative effects, from the polarisation of political positions to the spread of misinformation and disinformation and the over-representation of certain parties and policy positions through the platforms’ algorithms.

As digital platforms became a primary space for political debate and communication, the unregulated nature of the online – as opposed to the offline – environment poses increasing risks to democracy. In the ‘platform society’, the weakening of traditional gatekeepers has led to a paradigm shift: parties and candidates can directly engage with their (potential) supporters, with fewer regulatory constraints compared to traditional campaigning. Digital campaigns are heavily reliant on data, which allow political actors to design more sophisticated targeting of audiences compared to traditional media.<sup>7</sup> Micro-targeting enables parties to deliver a tailored message to each user or group of users. Ensuing significant democratic drawbacks are the over-simplification of political discourse, citizens’ objectification and the misuse of personal data.<sup>8</sup>

The 2025 Eurobarometer survey on Protecting and Promoting Democracy asked EU citizens about the importance (or lack thereof) of the measures to ensure the fairness of online electoral campaigns. A very large majority of them – about 85 percent – indicated that it is ‘(very) important’ to ensure the transparency of the origin and source of political messages, such as paid political advertising or the involvement of influencers in political campaigning. EU citizens regard it as an important issue across the 27 Member States – with slightly lower values for some Central and Eastern European countries – and across age and education cohorts – although somewhat less prominent for the oldest age groups. Citizens with tertiary education and those satisfied with the functioning of democracy are particularly concerned.<sup>9</sup>

In its digital rulebook, the EU has addressed the issue of online electoral communication and campaigning. In its 2018 Communication on securing free and fair elections already, the Commission presented several recommendations to safeguard the integrity of electoral processes, calling for extending conventional ('offline') electoral safeguards to digital media and platforms. Member States were encouraged to establish national election networks and appoint contact points to participate in the European Cooperation Network for Elections (ECNE).<sup>10</sup> The (self-regulatory) Code of Practice on Disinformation (CoP), also presented in September 2018, envisaged several commitments for its signatories, including on the transparency of political and issue-based advertising and the empowerment of researchers.

In December 2020, the European Commission published the EDAP to protect democratic integrity within the EU. Given the challenge represented by the digital transformation, the EDAP included an entire chapter on "Transparency of political advertising and communication" with a pledge to introduce dedicated legislation in 2021. The Commission stressed the importance of ensuring greater transparency in political advertising and connected commercial activities, so that citizens and stakeholders could clearly see the source and purpose of such advertising, both in the digital domain and in more traditional media.<sup>11</sup>

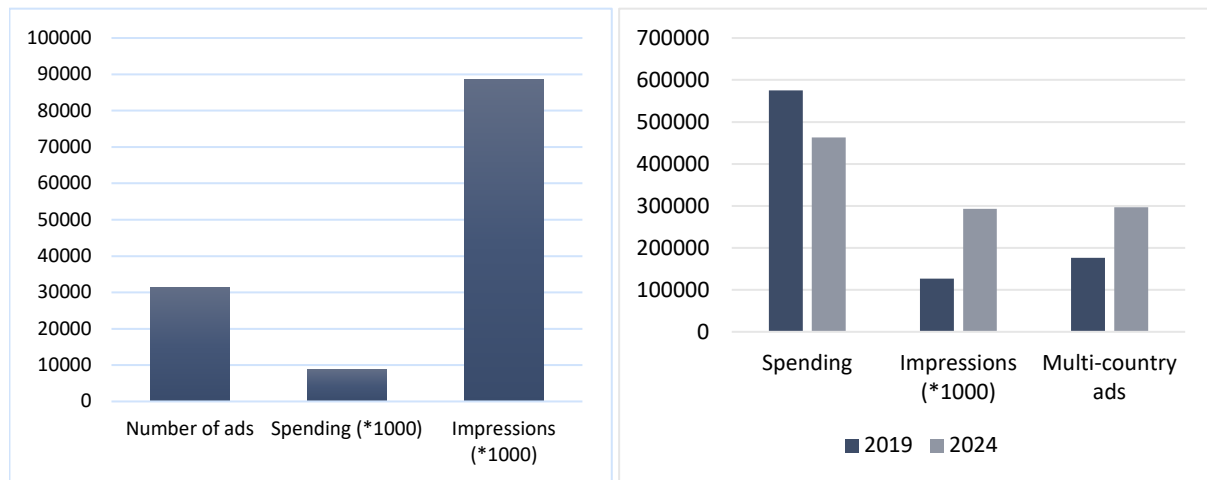
The centrepiece of the EU digital rulebook is the Digital Services Act (DSA), in force since 1 November 2022, which provides a single set of rules for all 'providers of intermediary services' in the EU single market. The DSA enhances the protection of citizens' fundamental rights online by requiring platforms to minimise the risks of exposing them to illegal or harmful content. The DSA places additional obligations on the largest providers of digital services – i.e. Very Large Online Platforms and Search Engines (VLOPs and VLOSEs) with at least 45 million monthly users in the EU – while exempting small and medium enterprises from some obligations. As for the transparency of advertising, the DSA requires it to be clearly labelled as such and include information on sponsors and targeting criteria. Additionally, it prohibits providers of online platforms from presenting advertisements to recipients based on profiling using special categories of personal data – including political opinions – as defined in Regulation 2016/679, the General Data Protection Regulation (GDPR). The Code of Practice on Disinformation was also strengthened in 2022, and it is now part of the DSA as a Code of Conduct on Disinformation.

Recognising the potential risks to electoral integrity and democracy stemming from the unlawful use of personal data, Regulation on verification procedure related to infringements of rules on the protection of personal data in the context of elections to the European Parliament (Regulation 2019/493) (Regulation 2019/493)<sup>12</sup> – now recast in Regulation on the statute and funding of European political parties and European political foundations (Regulation 2025/2445)<sup>13</sup> – introduced provisions to address situations in which European political parties or foundations take advantage of infringements of rules on the protection of personal data to influence the elections to the European Parliament (EP).

The 2024 EP elections confirmed the increasing importance of the online space for political campaigning. Looking at the political ads on Facebook and Instagram by political parties in the 27 EU Member States, they invested about €9 million to produce more than 30,000 ads. Such ads were visualised approximately 90 million times across the EU. Compared to the previous round of EP elections in 2019, parties increased their effort in online advertising, with more ads, a larger financial investment and more impressions in most Member States. Interestingly, political parties at the European level (i.e., Europarties), while investing slightly less resources in online advertising in 2024 compared to 2019, were much more visible online and across the 27 Member States.

## Digital advertising in the EP elections

Digital advertising by political parties in the Member States (2024) and by the Europarties (2019 and 2024 EP elections)



Data: Meta ads library. Note: values for spending and impressions for political parties are averaged across the 27 Member States.

Sources: *Left panel.* Authors' elaboration from Paulke, H. & S. Kruschinski, "Digital Political Advertising in European Parliament Elections: Spending and Reach of Social Media Advertisements by Political Parties in 27 EU countries", in M. Kaeding, M. Mueller & A. Hoppe (eds). *The 2024 European Parliament elections. A Turn to the Right in the Shadow of War*, 2025, pp. 253–70.

*Right panel.* Authors' elaboration from Piccio, D. R. & A. Seddone, "Seeking visibility at last? Europarties' digital advertising for the 2019 and the 2024 European Parliamentary elections", *Communications*, 2026, pp. 8–10, 15.

The objective of enhancing "transparency, accountability and integrity in the information space" is at the core of the Communication on the European Democracy Shield (EDS) released by the Commission in November 2025. The implementation and enforcement of the digital rulebook – particularly the DSA and the Artificial Intelligence (AI) Act, which requires labelling deep fakes and other AI-generated material on public matters – are regarded as "key priorities".<sup>14</sup> The Regulation on the Targeting and Transparency of Political Advertising (Regulation 2024/900) is mentioned in connection to the new "common research support framework" to be set up by the Commission to support researchers and academics through free access to data (i.e., repositories) and technologies (i.e., software).<sup>15</sup> In its Draft Report, the European Parliament's Special Committee on the European Democracy Shield (EUDS) also calls for the "full implementation" of key legislation in the digital space, calling for social media platforms to actively contribute to such efforts.<sup>16</sup>

### The Regulation on Political Advertising (TTPA): Key provisions

Delivering on commitments set forth in the EDAP, the Commission presented its proposal for the Regulation on the Targeting and Transparency of Political Advertising (hereinafter, TTPA or Regulation) as part of its November 2021 legislative package to strengthen democracy and safeguard the integrity of elections. Following extensive trilogue negotiations, the co-legislators reached an agreement in early November 2023. The TTPA came into force on 9 April 2024. Although most provisions became effective on 10 October 2025, the definitions laid down in Art. 3 and the rules concerning the non-discriminatory provision of cross-border political advertising (Art. 5(1)) have been in effect since the Regulation's entry into force, in time for the 2024 EP elections. The Guidelines to support the implementation of the Regulation (hereinafter, TTPA Guidelines) were published by the Commission on 8 October 2025.<sup>17</sup>

Building on the DSA, the TTPA establishes harmonised rules on transparency and due diligence obligations related to the provision of political advertising and related services (Chapter II), the use of targeting and ad-

delivery techniques (Chapter III) and supervision and enforcement (Chapter IV). The Regulation applies to political advertising that is typically provided for remuneration and distinguishes between the actors involved in the supply chain, each subject to different obligations. In this context, a *provider of political advertising services* is a natural or legal person engaging in the provision of political advertising services, excluding purely ancillary services and intermediary services without consideration for the specific message (Art. 3(5) and (6)).<sup>18</sup> A *political advertising publisher* is a provider of political advertising services that publishes, delivers or disseminates political advertising through any medium (Art. 3(13)), while the person at whose request or on whose behalf the political advertisement is prepared, placed, promoted, published, delivered or disseminated is the *sponsor* (Art. 3(10)). Obligations regarding targeting and ad-delivery techniques apply to *controllers* as defined in the GDPR and Regulation on the processing of personal data by the EU Institutions, Bodies and Agencies (Regulation 2018/1725).

### Main obligations for providers of political advertising services

- Non-discrimination. Art. 5(1) stipulates that providers of political advertising services must not discriminate against sponsors on their place of residence or establishment.<sup>19</sup> The principle of non-discrimination also applies to European political parties and political groups in the EP. Nonetheless, the TTPA provides for a ban on third-country sponsors in the EU before elections (see below).
- Identification of political advertising services. Providers of political services must request from sponsors a declaration on whether the requested advertising service constitutes a *political advertising service* and on whether they comply with the criteria regarding the ban on third-country sponsors (Art. 7(1)). Providers of political advertising services must ensure that the online interface is designed to facilitate compliance by sponsors, with the TTPA Guidelines (p. 32) outlining best practices.
- Record-keeping and transmission of information. Providers of political advertising services must retain specific pieces of information for a period of 7 years in a machine-readable format (Art. 9). Record-keeping obligations do not apply to micro-undertakings when the provision of services is marginal and ancillary to their activities (Art. 9(4)). However, as they still need to comply with other obligations under the Regulation, the Commission suggests they could, on a voluntary basis, keep records to the extent possible.<sup>20</sup> Such information – including updates – shall be communicated to political advertisement publishers so that they can comply with their respective obligations (Art. 10).
- Transmission of information. Providers of political advertising services must transmit any information requested by national competent authorities to verify compliance with obligations on record-keeping, labelling, transparency notices and periodic reporting. Art. 16 outlines detailed provisions to be followed, including stricter deadlines in the final month before an election or referendum. The TTPA Guidelines emphasise the requirement to appoint a 'contact point' for this purpose by highlighting best practices.<sup>21</sup> Furthermore, Art. 17 mandates that providers of political advertising must transmit "promptly and free of charge" any information they are required to maintain to requesting "interested entities", which include: (i) 'vetted researchers' as defined in the DSA; (ii) members of a civil society organisation whose statutory objectives are to protect and promote the public interest; (iii) political actors; (iv) recognised national or international electoral observers; and (v) journalists. Subsequent provisions specify deadlines, applicable fees or responses to requests that are unclear, excessive or involve information not in the provider's possession.

### Additional obligations for political advertising publishers

- Labelling and transparency notices. In addition to the obligations outlined above, pursuant to Art. 11 publishers of political advertising must ensure that each political advertisement is accompanied by a label containing detailed information about its nature, the sponsor, the election or regulatory process it relates to, any targeting and ad-delivery techniques and a transparency notice (or information on where it can be easily accessed). The information to be added to the transparency notice is laid down in Art.

12(1) and includes, among other elements, the source of the funds or other benefits received for the service and whether they originate within or outside the Union. Commission Implementing Regulation (EU) 2025/1410 outlines the format, template and specifications for labels and transparency notices.<sup>22</sup>

- European repository for online political ads. Political advertising publishers shall make all political advertisements they run, and the information included in transparency notices, available in a European repository established by the Commission.
- Periodic reporting. Political advertising publishers are also required to disclose information on the amounts or other benefits received in exchange for services provided, including on the use of targeting and ad-delivery techniques. This requirement does not apply to micro, small or medium-sized undertakings (Art. 14).
- Notification mechanism. Political advertising publishers shall establish a mechanism to notify content that is allegedly non-compliant with the Regulation.

### Obligations for sponsors

- Provision of information. Sponsors shall submit the declarations requested under Art. 7(1) and provide the information necessary to enable providers of political advertising services to comply with their obligations. Sponsors are responsible for the accuracy and truthfulness of the information provided and, when approached by providers of political advertising services in cases of manifestly erroneous information, they shall engage “without undue delay” (Art. 7(4)).

### Targeting and ad-delivery restrictions

Chapter III of the TTPA sets out specific requirements regarding targeting and ad-delivery techniques in the context of online political advertising, complementing the GDPR and Regulation (EU) 2018/1725.<sup>23</sup> Recital 74 explains its purpose by noting that the processing of personal data in relation to political messages not only has specific and detrimental effects on individuals’ fundamental rights and freedoms, but also negatively impacts the democratic process and increases the risk of information manipulation and foreign interference. Hence, Art. 18(1) establishes a series of principles for targeting or ad-delivery techniques, which are permitted when (a) the controller collects the personal data directly from the data subject – not from third parties (Recital 78); (b) the data subject has provided explicit and separate consent for political advertising purposes; *and* (c) these techniques do not involve profiling using special categories of data as defined in the GDPR and Regulation on the processing of personal data by the EU Institutions, Bodies and Agencies.<sup>24</sup> Additionally, as very young people “constitute a particularly vulnerable group [that] can be targeted specifically in order to manipulate the debate” (Recital 82), the use of these techniques is prohibited if they involve a data subject that the controller reasonably knows to be at least one year below the voting age (Art. 18(2)). The TTPA requires controllers to offer an ‘equivalent alternative’ for using the online service to data subjects that do not give their consent and should not seek consent again if it has already been refused (Art. 18(4)). This last point is closely linked to the requirement that controllers ensure individual decision-making is not influenced by ‘dark patterns’ (Recital 75).

Further transparency obligations related to targeting and ad-delivery techniques are introduced (Art. 19). These include adopting and publishing an internal policy on their use, maintaining relevant records, conducting an annual risk assessment and providing additional information to enable the individual concerned to understand the underlying logic and the main parameters used, including the potential recourse to AI systems. The European Data Protection Board (EDPB) is empowered to issue guidelines to assist relevant supervisory authorities in assessing compliance with the requirements of the Regulation (Art. 22(2)).<sup>25</sup> At the time of writing, the EDPB has launched preparatory work on these guidelines and organised a remote event on 27 March 2026 to collect stakeholders’ inputs.<sup>26</sup>

## Foreign interference and elections

Art. 5(2) introduces a ban on third-country sponsors in the three months prior to an election or referendum at the Union, national, regional or local level: political advertising services can only be provided to (i) Union citizens, (ii) third-country nationals permanently residing in the Union with the right to vote in that election or referendum under applicable law or (iii) a legal entity established in the Union that is not ultimately owned or controlled by a third-country national – excluding those in point (ii) – or by a legal person established in a third country. As noted in Recital 19, this provision is closely related to the securing of democracy – “which is of fundamental importance to the Union and its Member States” – and should serve as a “common minimum standard” without affecting the adoption of stricter national rules in accordance with EU law. Member States shall publish the dates of their elections and referendums and, where applicable, their electoral periods, while the Commission shall be responsible for establishing a publicly accessible EU portal that displays these dates and, where applicable, electoral periods (Art. 26). In this context, it is important to note that the term ‘election’ should be understood broadly, as it encompasses elections and referendums at all levels and elections to select the leadership of political parties (Recital 31). This provision entails significant consequences for the regulation of elections also within Member States.<sup>27</sup>

## Key implementation challenges

This section presents key and selected implementation challenges as identified by the main stakeholders.<sup>28</sup> It focuses on: i) the definition of political advertising; ii) the interaction between the TTPA and other digital regulations such as the DSA and the AI Act; iii) the establishment of a European repository; iv) the governance system for supervision and enforcement and v) the role of influencers.

### What political advertising is (not) and should (not) be

Art. 3(2) defines political advertising as:

*the preparation, placement, promotion, publication, delivery or dissemination, by any means, of a message.*

Such a definition covers all stages of the production process and all forms of political advertisement, both new and traditional. It explicitly refers to a ‘message’, indicating that content which cannot be classified as a message – the TTPA Guidelines (p. 12), for instance, mention the logo of a party on promotional merchandise – should not constitute advertising. Art. 3(2) further specifies that political advertising is:

*normally provided for remuneration or through in-house activities or as part of a political advertising campaign.*

Therefore, to be considered as political advertising, messages should belong to one of the three categories above. First, as for *remuneration*, the TTPA Guidelines (p. 14) make it clear that, in line with the general notion of remuneration under EU law, it has to be understood broadly, not only including monetary compensation, but also benefits in kind such as discounts, travel arrangements, accommodation, access to events or places that would otherwise be paid for. Volunteering for a political party, which does not entail remuneration, is therefore not considered political advertising. Second, *in-house services* are about those situations where entities such as political parties generate and distribute political advertising internally, without outsourcing activities. Third, *political advertising campaigns* are about contractual arrangements and payments covering all linked political advertisements together.

Art. 3(2) further specifies that messages are *by, for or on behalf of a political actor*, where the latter are political parties, both in the Member States and at the EU levels; candidates to elections at all levels, including leadership positions within political parties; members of EU institutions or domestic governments

at all levels; political campaigns organisations and any natural or legal person representing or acting on behalf of the above categories. The TTPA Guidelines – building on Recital 22 TTPA – specify that an analysis of the concrete situation is necessary to determine whether political advertising is being conducted directly 'by' a political actor or whether another entity is acting 'for' or 'on behalf' of a political actor in a particular case (i.e., contractual arrangements, mandates or instructions. Messages that are purely private or purely commercial in nature are not categorised as political advertising.

Furthermore, indent b) of Art. 3(2) also categorises as political advertising any message:

*which is liable and designed to influence the outcome of an election or referendum, voting behaviour or a legislative or regulatory process, at Union, national, regional or local level*

This is a key – and controversial – feature of the definition, as it extends political advertising to messages which are both liable and designed to influence voting outcomes or regulatory processes, at all levels. The TTPA Guidelines make it clear that the two conditions are cumulative (p. 17): if a message ends up influencing elections, but was not designed for that purpose, it should not count as political advertising. They also engage at length with those “practical elements” to be considered to correctly identify it, elaborating on the features listed in Art. 8(1). At the core of the identification process, it is the existence of a “clear and substantive link” between the message and its political nature, to be captured by means of a holistic analytical approach. It should be noted that the identification is made *ex ante* and not established *ex post* because of the impact of the message (i.e., the number of impressions on social media). Member States are not forbidden to provide additional guidance, particularly through dedicated websites (TTPA Guidelines, pp. 18-21 and particularly Table 1).

Finally, Art. 3(2) lists three instances where the TTPA does not apply. First, institutional messages from the EU or the Member States on the organisation of elections or referendums. Second, public communication merely providing official information to citizens. Third, the presentation of candidates in electoral processes, as regulated by national legislation and ensuring their equal treatment. Elsewhere, the Regulation makes it clear that it neither applies to political opinions expressed in a personal capacity (Art. 1(3)) nor to political content under the media’s editorial responsibility (Art. 1(2)). It does not cover the factual correctness of the content of political advertising (i.e., misinformation or disinformation).

Several stakeholders nailed the definition of political advertising as too broad and wide-ranging, particularly as it also includes issue-based advertising. Concern has been expressed on the interpretation of indent b) of Art. 3(2), as it may encompass a wide range of communication activities by civil society organisations, including civic discussions and advocacy campaigns. A broad interpretation of the definition may therefore end up – inadvertently or intentionally – hindering the work of civil society organisations.<sup>29</sup> In parallel, others have warned that issue-based commercial advertising may also be understood as political advertising (for instance, when a company supports a social cause close to its core values).<sup>30</sup> While the TTPA Guidelines make some concrete examples of cases of “purely commercial nature”, the criteria to classify issue-based advertising (both commercial and by civil society organisations) as political advertising according to the TTPA remain quite *ad hoc* and not straightforward to apply. It has been suggested that the compilation of a non-exhaustive national list of relevant topics to be understood as political ahead of each election or referendum may enhance a more consistent application of the Regulation.<sup>31</sup> On the other hand, the list may itself become easily politicised or be instrumentally used by political actors with governing responsibilities.

The strongest and most consequential criticism of the definition of political advertising according to the TTPA came from ‘Big Tech’ companies such as Meta and Google which, ultimately, led them to refuse to publish political advertising in the EU ahead of the entry into force of the Regulation on 10 October 2025. As Google argued, the TTPA:

*unfortunately introduces significant new operational challenges and legal uncertainties for political advertisers and platforms. For example, the TTPA defines political advertising so broadly that it could cover ads related to an extremely wide range of issues that would be difficult to reliably identify at scale.*<sup>32</sup>

While it has been questioned whether companies such as Google could not effectively mobilise the resources to reliably identify issue-based advertising as political advertising under the TTPA, the complexity of the Regulation led them opting for a risk-avoidance behaviour rather than engaging in case-by-case classification. Incidentally, Meta and Google definitions of political advertising were only partly aligned with the definition provided by the TTPA: in particular, Google restricted political advertising to narrowly defined EU election advertising and, while not excluding other political or issue-based advertising from its services, the latter were not subject to the same restrictions.<sup>33</sup>

### Interaction with the Digital Services Act

As part of the EU's broader digital rulebook, the TTPA interacts with – and complements – existing provisions enshrined in relevant Union legislation, most notably the DSA. In general terms, the TTPA establishes a regulatory framework applying to both online and offline advertising, which “provide[s] additional granularity” and is without prejudice to the horizontal rules laid down in the DSA (Recital 51 and Art. 2(3)(i) TTPA). The recent report issued by the Commission pursuant to Art. 91 DSA (hereinafter ‘Commission Report’) concludes that the TTPA and the DSA apply “concurrently, in a limited, coherent and complementary manner, only to intermediary services involved in the dissemination of political advertising” and highlights potential overlaps between the two texts.<sup>34</sup> Indeed, Art. 3(5) TTPA excludes from the definition of ‘political advertising service’ online intermediary services as defined in the DSA, which are provided *without consideration* (i.e., regular payment and/or benefits in kind) for the specific message. This is meant to exclude situations in which the provider of intermediary services enables the provision of political advertising services, but is not involved in the production chain thereof (TTPA Guidelines, p. 6). However, specific obligations may arise when these services are provided *with consideration* for the specific message.<sup>35</sup>

Against this backdrop, several provisions enshrined in the TTPA and the DSA stand out for their close interplay. In the ensuing analysis, appropriate reference will also be made to the Code of Conduct on Disinformation,<sup>36</sup> and to the Election Guidelines for Very Large Online Platforms and Search Engines (VLOPs and VLOSEs) that were issued in April 2024.<sup>37</sup> The DSA also provides for the elaboration of Codes of Conduct for online advertising pursuant to Article 46; however, at the time of writing, these have not yet been drawn up or released.<sup>38</sup>

### Systemic risks

First, as is widely recognised, a defining feature of the DSA can be identified in the obligation falling upon providers of VLOPs and VLOSEs to diligently identify, analyse and assess any systemic risks arising from the design and functioning of their service and its related systems, including algorithmic systems, or from the use of its service (Art. 34 DSA), as well as to put in place reasonable, proportionate and effective mitigation measures, tailored to the specific systemic risks identified (Art. 35 DSA). While the TTPA does not contain a similar obligation, Recital 46 of the same Regulation clarifies that political advertising publishers that are also VLOPs and VLOSEs *should* also consider any systemic risks posed by their political advertising services when fulfilling their obligations under Art. 34 and 35 DSA. Additional voluntary commitments regarding political advertising and demonetisation are included in the Code of Conduct on Disinformation (Commitments 1–13), which supports signatories to comply with relevant obligations under the DSA. Art. 45 DSA favours the development of such codes to address online issues, such as illegal content or systemic risks.

On this point, it is also relevant that the Election Guidelines – which should assist VLOPs and VLOSEs in fulfilling the aforesaid obligations under the DSA in an electoral context – address the risks posed by political advertising by recommending that they “[e]nsure that there are adequate policies and systems in place to prevent the misuse of advertising systems to disseminate misleading information, disinformation and FIMI with regards to electoral processes, including deceptive generative AI content”,<sup>39</sup> among other measures. In an answer to a parliamentary question, Commissioner McGrath has clarified that the TTPA does not ban political advertising and that “the Commission is monitoring the implications of the relevant companies’ decisions also in light of the Election Guidelines”.<sup>40</sup> In relation to this aspect, the Election Guidelines also recommend that providers of VLOPs and VLOSEs, when they do not allow political advertising on their services, “have efficient verification systems in place and take the necessary actions to ensure that the decision is appropriately enforced”.<sup>41</sup>

### Notice-and-action mechanisms

Second, the two Regulations interact closely regarding the provisions on the ‘notice and action mechanisms’ (Art. 16 DSA) and the mechanism for reporting potentially non-compliant content under the TTPA. More specifically, political advertising publishers are required to implement mechanisms that enable natural or legal persons to flag advertisements that may breach the Regulation (Art. 15 TTPA).<sup>42</sup> The rationale of this Article is clarified in Recital 69, which states that “[c]ivil society organisations, human rights and watchdog organisations, journalists and other interested entities have a crucial role to play in that regard”. The TTPA states that these mechanisms should allow the submission of “precise and substantiated notifications”, which must include specific elements laid down in Art. 15(3). In any case, the TTPA-related obligations concerning the mechanism should not be considered as triggering a requirement for publishers (including online platforms when acting as such) to engage in general monitoring. To support political advertising publishers in the application of Art. 15, the Commission is empowered to issue dedicated guidelines, which should support in particular “the preparation of suitable technical specifications for the mechanisms, adapted for audiovisual and printed media as well as online and offline advertising” (Recital 70 TTPA).

In this context, a key provision of the Regulation is enshrined in Recital 69, which stipulates that, where appropriate, political advertising services should be able to rely on existing mechanisms, most notably the ‘notice and action mechanisms’ provided for in the DSA when they also qualify as online hosting providers. This is where Art. 16 DSA comes into play, as it requires providers of hosting services to set up appropriate ‘notice and action mechanisms’ that allow individuals and other stakeholders to report alleged ‘illegal content’ as defined in Art. 3(h) DSA. Significantly, pursuant to Art. 8 DSA, providers of intermediary services are not required to monitor or “actively seek facts or circumstances indicating illegal activity” and a similar provision is included in Recital 55 TTPA regarding political content.

Against this backdrop, two cases stand out. On the one hand, providers of intermediary services may qualify as hosting service providers under the DSA but *not* as political advertising publishers under the TTPA. As a result, Art. 15 TTPA would not apply. However, as recalled by the Commission both in its TTPA Guidelines (p. 41) and in its Report pursuant to Art. 91 DSA (p. 140), providers of intermediary services may still be notified of alleged illegal political advertisements under the TTPA. As a result, they are required to process the notices received and decide upon them in a “timely, diligent, non-arbitrary and objective manner” (Art. 15(6) DSA) if they want to benefit from the liability exception pursuant to Art. 6 DSA.<sup>43</sup> On the other hand, providers of intermediary services might qualify as providers of hosting services under the DSA *and* as political advertising publishers under the TTPA. In such cases, obligations under both the TTPA and the DSA would apply if triggered, with both frameworks including relevant receipt confirmation and follow-up measures for notifications. Under the TTPA, political advertising publishers that are VLOPs or VLOSEs are required to examine and address the notification they receive and to inform the notifier of any follow-up actions taken “without undue delay” (Art. 15(5) TTPA). Conversely, publishers that are not VLOPs or VLOSEs

are only required to make “best efforts” to examine and address notifications and inform the notifier “at least upon request” of the relevant follow-up actions (Art. 15(6) TTPA). Tighter deadlines are set for the last month before an election or referendum (Art. 15(7) TTPA).

Within this general framework, it is important to note that, under Art. 12(2) TTPA, a mislabelled political advertisement does not automatically result in the discontinuation of the advertisement, as a “stepwise approach” would be used instead (TTPA Guidelines, p. 40) – political advertising publishers are required to make “best efforts” to correct or complete missing information, including by contacting the sponsor or providers of political advertising services. The adoption of such an approach is not foreseen in the case of the ‘notice and action mechanisms’ under Art. 16 DSA.<sup>44</sup> As stated in the TTPA Guidelines (p. 41), the notion of ‘best efforts’ “generally refers to sensible means and actions to achieve a specified objective” and “assumes acting in good faith and employing logical steps that could be reasonably expected to be undertaken in similar circumstances to achieve the desired outcome, without necessarily determining the result of the process”. While providing some concrete examples (e.g. implementing a clear protocol, training staff), the Commission finally concludes that the concrete understanding of the notion must ultimately be determined on a case-by-case basis, depending on the context and the available resources.

Should a follow-up measure to a notification impose any restrictions on the political advertisement, both Art. 15(9) TTPA and Art. 17 DSA would apply concurrently. Pursuant to the first provision, political advertising publishers would be required to inform the sponsors or providers of political advertising services of any follow-up measures taken after the notification, thereby adding to the obligation to inform notifiers as outlined above. Under Art. 17 DSA, providers of hosting services are instead mandated to issue a more detailed ‘statement of reasons’ to the recipient of the service, which shall include the mandatory information outlined in the same Article. A key aspect worth highlighting is that, while statements of reasons would appear in the Transparency database established under Art. 24 DSA, a similar requirement is not foreseen for notifications under the TTPA.

### Supervision and enforcement

Third, if both DSA- and TTPA-related obligations are triggered, the supervisory and enforcement mechanisms set out in the two legal texts will apply in parallel, entailing extensive cooperation between the relevant authorities at the national and Union level.<sup>45</sup> While oversight under the TTPA, including in relation to intermediary services, will be addressed in greater detail below, suffice it to say that implementation challenges may also arise in relation to the right to lodge a complaint with competent authorities regarding possible infringements of the Regulations and to receive follow-up information, as foreseen under Art. 24 TTPA and Art. 53 DSA. On this point, Recital 105 and Art. 24 TTPA confirm that the procedure envisaged under the TTPA is without prejudice to the procedure under Art. 53 DSA or any other procedure. However, both procedures may apply in case of complaints concerning political advertising content disseminated through intermediary platforms that constitute a publishing service and, in this case, there appears to be “no mechanism in the current DSA compliant system to resolve jurisdictional or procedural duplication”.<sup>46</sup> This is further complicated by the fact that, in principle, TTPA oversight of intermediary services remains at the national level, whereas DSA oversight of VLOPs and VLOSEs is entrusted to the Commission.

A further layer of complexity concerns the requirement to designate legal representatives for providers of political advertising services (Art. 21 TTPA) or providers of intermediary services (Art. 13 DSA) that do not have an establishment in the Union. The TTPA Guidelines recall the more extensive provisions enshrined in the TTPA framework compared to the DSA, including the requirement to establish a Union-wide portal linking online national registers of legal representatives managed by the Commission (para. 3.2.9). In this context, it may occur that both provisions apply concurrently;<sup>47</sup> however, potential inconsistencies may be resolved by implementing what is envisaged under Recital 89 TTPA, namely the designation of the same legal representative appointed under the GDPR or the DSA as legal representative under the TTPA.

Finally, overlaps between the two legal frameworks may also arise regarding the obligations related to the repositories for online advertising, which will be addressed in the relevant section below.

### Interaction with the Artificial Intelligence Act and further regulatory developments

The TTPA also interacts with relevant provisions of the AI Act. Pursuant to Art. 6(2) AI Act, read in conjunction with Annex III, point 8(b) of the same Regulation, AI systems intended to be used for influencing the outcome of an election or referendum or the voting behaviour of natural persons in the exercise of their vote are classified as *high-risk AI systems*. The classification does not extend to AI systems whose outputs are not directly exposed to individuals, such as tools used solely for the administrative, organisational or logistical management of political campaigns.<sup>48</sup> Recital 62 of the Act clarifies that this provision is aimed at addressing “the risks of undue external interference with the right to vote” and is without prejudice to the rules laid down in the TTPA. This clarification is significant because classifying an AI system as *high-risk* triggers the application of additional compliance requirements and obligations under Chapter III, Sections 2 and 3 of the AI Act. Additionally, the Act prohibits the use of biometric categorisation systems to assign natural persons to certain sensitive categories, including political orientation (Art. 5(1)(g) AI Act).

As regards oversight, the AI Act designates data protection supervisory authorities as market surveillance authorities for AI systems listed in Annex III, point 8. These authorities are empowered to initiate joint investigations with the Commission, with the support of the AI Office (Art. 74(8) and (11) AI Act). Where the EU Institutions, Bodies and Agencies (EUIBAs) – with the exception of the Court of Justice of the EU – fall within the scope of the Act, the European Data Protection Supervisor (EDPS) is designated as the market surveillance authority. This governance choice is particularly relevant in the context of political advertising, as the same national data protection supervisory authorities and the EDPS are also responsible for monitoring compliance with TTPA obligations related to targeting and ad-delivery techniques.

While the AI Act should fully apply as of 2 August 2026, the relevant regulatory framework is subject to revision in the context of the proposed ‘Digital Omnibus on AI’, which the Commission presented on 19 November 2025 as part of a broader ‘Digital package’.<sup>49</sup> Among the main provisional changes emerging from the ongoing interinstitutional negotiations, two developments are particularly noteworthy.

First, the Commission proposed amending the application of the rules for stand-alone high-risk AI systems listed in Annex III (see above) to occur six months after a Commission decision on the availability of adequate measures supporting compliance with Chapter III or, in the absence of such measures, on 2 December 2027. By contrast, both the EP and the Council favoured a fixed timeline on 2 December 2027. Second, the Commission’s proposal centralises oversight of AI systems that are constituted or integrated into VLOPs or VLOSEs to the AI Office, an approach that is substantially confirmed by the co-legislators. This is significant insofar as, while the oversight of VLOPs and VLOSEs would be set at the EU level, compliance with obligations for intermediary services, including VLOPs and VLOSEs, under the TTPA is mainly entrusted to Member States (see below). The final form of the EU governance mechanism in this area will significantly affect the EU’s capacity and effectiveness in supervising AI models, including in relation to political advertising, especially at a time when practices such as ‘LLM grooming’ have been flagged.<sup>50</sup>

### Towards a European repository for online political advertising

A distinctive feature of the TTPA is the creation of a ‘European repository’, which its Art. 13 defines as:

*a public repository for all online political advertisements published in the Union or directed to Union citizens or residents in the Union*

Ad repositories – or ad libraries – are essential tools to allow journalists, researchers and civil society at large to monitor political campaigning, as they provide information on political advertisements that are publicly made available online through application programming interfaces (APIs). The European repository – whose

detailed arrangements are set out in an implementing regulation – should include information enabling the identification of political advertising, its URL (when available), its language, and all the elements of the transparency notice.<sup>51</sup> The European repository is directly managed by the Commission, which shall ensure the publication of all information about political advertising and effective access to all interested individuals (Art. 13(1) and Recital 64).

Specific obligations are foreseen for political advertising publishers which are VLOPs and VLOSEs (Art. 13(2)). They must make each political advertisement, together with the information required under transparency notices, available *both* in the repositories required by the DSA *and* in the European repository from the moment of publication until the removal of the ad, and for seven years thereafter. Other online political advertising publishers are also required to make political ads with the required information available in the European repository no later than 72 hours after the first publication (Art. 13(4)).

As different ad repositories will co-exist under the new regulatory regime, an important issue that has been flagged by several stakeholders for the implementation phase is ensuring their comparability and interoperability.<sup>52</sup> The duplication of repositories is an issue which primarily affects large operators subject to obligations under both the DSA and the TTPA.<sup>53</sup> The Commission's proposal for a (recast) Regulation on the statute and funding of European political parties and European political foundations also included an *ad hoc* ads repository for all the political advertising material sponsored or directly published by the Europarties, to be managed by the Authority for European political parties and European political foundations (APPF), but the creation of such a repository was eventually removed from the final Regulation.<sup>54</sup> While this reduces the administrative burden for the Europarties to share information both with the APPF and the online platforms publishing their ads, it could be worth reconsidering the publication by the APPF of an annual report on their advertising activity, enhancing transparency over their use of financial resources.

Following the decision of Google and Meta to ban political advertising from their services (see above), which was accompanied by Google removing seven years of political advertising history from its Google Ad Archive in its Transparency Centre – where the EU no longer appears as a 'supported region'<sup>55</sup> – academics stressed the importance of a timely implementation of the European repository. The decision of major platforms to discontinue their historical archives and repositories in the EU, while the European repository has not been set up yet, arguably leaves in place a "significant transparency gap", which is in no way compensated by the self-reporting activities (when and where in place) by political parties and organisations.<sup>56</sup>

A major concern is about the possibility that large platforms would use their formal ad bans to avoid the regulatory constraints set by the TTPA and escape accountability and responsibility: as the campaign for the parliamentary elections in Hungary showed, political advertising still manages to appear 'under the radar' and get published on platforms before it is eventually identified as such.<sup>57</sup> If political advertising 'slips through' – notwithstanding the formal, self-imposed ban by platforms – the Commission should still demand that it is published on the European repository according to the TTPA.<sup>58</sup>

### Governance system for supervision and enforcement

The TTPA establishes a polycentric and multilevel supervisory framework that relies on several authorities to function. Data protection authorities are responsible for overseeing and enforcing obligations related to targeting and ad-delivery techniques (Art. 22(1)). These include the EDPS and the supervisory authorities designated under the GDPR, acting within their respective areas of competence.<sup>59</sup> For providers of online intermediary services, Art. 22(3) states that Member States must appoint national authorities responsible for supervising compliance with the relevant provisions outlined in Art. 7 to 17 and 21 of the Regulation. The authorities tasked with supervising under the DSA – including Digital Services Coordinators (DSCs) – may also be designated for this purpose, even if this is not a strict requirement. In any case, the DSC is tasked

with ensuring coordination at the national level in overseeing online intermediary services under the Regulation.<sup>60</sup> For all other matters outside data protection and online intermediary services, oversight is entrusted to competent authorities designated by Member States, which may differ from those recalled above (Art. 22(4)). In this context, Member States are free to appoint, for this purpose, the same regulatory authorities or bodies designated under the Audiovisual Media Services Directive (AVMSD); however, their choice may also fall on other authorities, including election or judicial authorities (Recital 92). In any case, they shall ensure “effective and structured cooperation and coordination” among all relevant national authorities to enforce the TTPA (Art. 22(7)).

Overall, this overview highlights that several national authorities are involved in the supervision and enforcement mechanism envisaged by the TTPA. Moreover, the Regulation grants Member States significant discretion in choosing competent authorities for matters outside data protection. In practice, this could result in Member States adopting different organisational practices in their governance mechanisms regarding supervision and enforcement under the TTPA. Additionally, the Regulation provides for the designation of ‘national contact points’ responsible for supporting and facilitating “effective cooperation between national competent authorities and the national contact points of Member States” (Art. 22(9)). Member States are required to publish the contact details of their national contact points; however, this requirement does not extend to other designated authorities, whose names and respective tasks shall be communicated to the Union-level ‘network of national contact points’ only *when relevant* (Art. 22(9)).

A defining feature of the TTPA governance mechanism is that, in principle, supervisory and enforcement actions take place mainly at the national level, with cross-border cooperation between competent authorities occurring as appropriate (Art. 23).<sup>61</sup> Regarding the enforcement mechanism under the GDPR, especially the multi-level coordination needed for cross-border cases, research has identified several shortcomings, including procedural complexity, inconsistent enforcement practices among Member States and institutional imbalances.<sup>62</sup> Significantly, this supervisory and enforcement model also applies to the oversight of TTPA-related obligations concerning online intermediary services. In particular, Recital 91 clarifies that cross-border cooperation between Digital Services Coordinators (DSCs) under the TTPA should be limited to national cooperation and should not involve escalation to the Union level. In other words, as the Commission has noted, all supervisory and enforcement actions regarding online intermediary services under the TTPA generally remain at the national level, with the Commission responsible only for assessing compliance with their obligations relating to the European repository for online political advertisements.<sup>63</sup> This stands in contrast with the provisions enshrined in the DSA framework, under which the Commission has exclusive supervisory and enforcement powers over Very Large Online Platforms and Search Engines (VLOPs and VLOSEs). As a result, it remains to be seen how supervision and enforcement powers will be exercised if VLOPs or VLOSEs are subject to both the DSA and TTPA obligations.

Against this backdrop, the institutional framework envisaged at the Union level under the Regulation introduces an additional layer of complexity. Pursuant to Art. 22(8), the TTPA provides for the establishment of a ‘Network of national contact points’, which shall meet at least twice a year on an ordinary basis to exchange information, share practices and promote structured cooperation between national contact points and the Commission on the application and enforcement of the Regulation, including on the preparation of guidelines for sponsors and providers of advertising services. Additionally, a comitology Committee was established to assist the Commission in adopting the implementing acts as foreseen under the Regulation (Art. 29).<sup>64</sup> An informal ‘Expert group of providers of political advertising services’ was also set up in November 2025 to provide the Commission with expertise and advice for implementing the Regulation.<sup>65</sup> The Expert Group has been criticised for its lack of inclusiveness as its members are selected exclusively from economic operators that provide political advertising services and their associations.<sup>66</sup>

### Implementing the TTPA in Ireland: An effective management of complexity

On 9 October 2025, the European Union (Political Advertising) Regulations 2025 (S.I. No. 474 of 2025) were adopted pursuant to section 3 of the European Communities Act 1972 to facilitate implementation of the TTPA in Ireland. Under the Regulations, An Coimisiún Toghcháin ('The Electoral Commission') is designated as the competent authority under Art. 22(3) and 22(4) TTPA (subject to the provisions mentioned below) and as Ireland's national point of contact. Coimisiún na Meán ('Media Commission') is instead designated as the competent authority to supervise compliance with the obligations enshrined in Art. 7 to 17 of specific entities, including providers of intermediary services. Finally, the Data Protection Commission is entrusted with overseeing compliance with the provisions on targeting and ad-delivery techniques under the TTPA. The Regulations provide for the conclusion of an agreement between the authorities to facilitate cooperation in the performance of their respective functions.

While Coimisiún na Meán is also appointed as Ireland's Digital Services Coordinator under the DSA, An Coimisiún Toghcháin is not part of the European cooperation network on elections (ECNE), contrary to what Recital 103 TTPA envisages – the Department of Housing is Ireland's ECNE member. However, it should be highlighted that the Electoral Commission's website features user-friendly 'Frequently Asked Questions (FAQs)' and 'Political Advertising Complaint Form' sections.

Among other provisions, the Regulations clarify that the amount of an administrative financial penalty shall not exceed the thresholds laid down in Art. 25(2) TTPA and provide for the imposition of periodic administrative financial penalty, "which shall not exceed a maximum of €1,000 for each day or part of a day on which the relevant infringement is continued" (Regulation 23(1)(b)).

Sources: [An Coimisiún Toghcháin](#); [electronic Irish Statute Book](#); [European Commission](#); [European Commission](#).

The new Network of national contact points integrates itself into an already heavily institutionalised environment comprising several other relevant bodies or mechanisms. The reference is, first and foremost, to the European cooperation network on elections (ECNE), which was launched in 2019 as a platform for sharing information and best practices on election-related matters. In this context, it is important to recall that, according to ECNE's Terms of Reference, 'measures to ensure transparency in online political advertising' are included in the non-exhaustive list of topics to be considered for its work.<sup>67</sup> TTPA-related implementation issues were explicitly addressed in several ECNE meetings that occurred in 2025.<sup>68</sup> To improve the workflow between the two networks, Recital 103 states that national contact points should, where possible, be ECNE Members. Additionally, pursuant to Art. 22(8), the Network shall also work in close cooperation with the European Board for Digital Services (EBDS), the European Board for Media Services (EBMS) and any other relevant body or network. In its Annual Work Plan (Q4/2025 to Q4/2026), the EBDS has clarified that it "will continue supporting the DSCs in the role given to them in that Regulation and contribute to the preparedness for crisis context",<sup>69</sup> while the Media Board has recently acknowledged that "[c]larifying the interlinks between these bodies and fostering practical exchanges on high-level issues in the future will be essential to ensure complementarity between frameworks, enhance legal clarity, and improve the overall effectiveness of enforcement".<sup>70</sup>

A final remark concerns the sanctions provisions under the TTPA. A notable shortcoming is that the task of laying down rules on sanctions or other measures applicable for infringements is essentially left to the Member States.<sup>71</sup> The Regulation only specifies the maximum amount – and not the minimum thresholds – of the financial penalties that may be imposed, which are set at either 6% of the annual income or budget of the sponsor or of the provider of political advertising services (whichever is the highest) or 6% of the annual worldwide turnover in the preceding year (Art. 25(2)). As a result, Member States may fail to impose sufficiently dissuasive sanctions for TTPA-related infringements and, consequently, they may not prevent

the spread of political advertising throughout the Union's digital environment.<sup>72</sup> In other words, a risk of 'forum-shopping' whereby providers choose to establish in jurisdictions with less strict sanctions for infringements cannot be ruled out *a priori*. In its input, the Media Board has suggested that "the EC's guidance should recommend that the Member States introduce minimum financial sanctions that are both dissuasive and proportionate".<sup>73</sup> However, the TTPA Guidelines do not address the matter.

### The role of influencers

Political influencers are increasingly shaping public discourse in the EU and elsewhere. The TTPA explicitly mentions influencers twice in Recital 1; while this generally confirms that influencers are covered by the Regulation, questions remain about the scope of the provisions specifically applicable to them. The TTPA Guidelines provide some clarification on this matter (para. 3.3.6), indicating that different obligations apply depending on the services they offer. More specifically, if influencers are merely involved in the preparatory stage of political advertising, only the obligations applicable to all political advertising providers would be relevant. If they are, instead, involved in the publication or dissemination of political advertising, the obligations relating to political advertising publishers would also apply. Notably, the TTPA Guidelines recall that, as set out in Recital 55, influencers may rely on the tools provided by providers of online platforms to comply with the Regulation, while retaining at the same time the ultimate responsibility as publishers. Considering such obligations, compliance with the TTPA may be facilitated through the 'Influencer Legal Hub',<sup>74</sup> already featuring content on advertising that may be easily updated with the new provisions.

Against this backdrop, it must also be acknowledged that minimising burdens for micro, small or medium-sized undertakings, as outlined in the TTPA and highlighted in the Guidelines (para. 3.4), may also apply to influencers who qualify as such. Art. 3 of Directive on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings (Directive 2013/34/EU) defines micro, small and medium-sized undertakings based on balance sheet, net turnover and average number of employees. However, it remains to be seen whether identifying minimising burdens for influencers solely on economic grounds appears to be fit for the digital age. Recent research has identified a non-exhaustive list of attributes extending beyond economic considerations that can indicate political influencers. Specifically, these include communication relationships, audience size, compensation, the definition of what constitutes political, formal political roles and autonomy/control.<sup>75</sup> On this point, the Recommendation on online safety and empowerment of users and content creators, adopted on 8 April 2026, by the Committee of Ministers of the Council of Europe, acknowledges that "[t]he particular role, professional standing or position in society of the content creator may entail specific and additional responsibilities, as well as corresponding accountability mechanisms".<sup>76</sup>

Among other minimising burdens, micro-undertakings and SMEs are exempted from providing periodic reporting on political advertising services, including the amounts invoiced or the benefits received (Art. 14(2)). Moreover, in the last month preceding an election or a referendum, micro and small undertakings are mandated to provide information requested by national competent authorities "without undue delay and *where possible* before the date of the election or referendum" (Art. 16(4), emphasis added). While these provisions rightly aim to reduce compliance costs for specific undertakings, their overall impact on the Regulation's effectiveness regarding (political) influencers remains to be fully assessed.

On a more general level, in a recent report focusing on influencers, the EBMS has acknowledged that "the regulation of vloggers and influencers presents a growing challenge for National Regulatory Authorities (NRAs), particularly in the context of the current audiovisual regulatory framework" and suggested that the establishment of a minimum and "future-proof definition" could help overcome national inconsistencies and legal uncertainties on the matter, while maintaining national specificities.<sup>77</sup> On this point, also in light of recent evidence regarding the 2024 Romanian elections, the EUDS Draft Report "[r]ecommends further examining the role of influencers, including nano- and micro-influencers, in shaping public discourse and

influencing elections” and “stresses [...] the need for robust standards on transparency and information integrity for online political creators, especially influencers operating in a grey area between commercial promotion and political messaging”.<sup>78</sup> While NRAs have already begun addressing the matter and the Council has provided a non-binding definition of ‘influencer’,<sup>79</sup> the forthcoming Digital Fairness Act (DFA) could further address the issue, as this Act is set to cover “preventing harmful practices by influencers”, among other topics.<sup>80</sup> In any case, it is paramount that any potential overlap or duplication with existing provisions is thoroughly addressed before any new legal text is added to the EU’s digital rulebook.

## Implementing and revising the digital rulebook to protect democracy

The implementation of the TTPA, following its entry into force on 10 October 2025, is still an ongoing process. For example, the institutionalisation of the national governance system for enforcement and supervision, a thorough assessment of the decision of Google and Meta to ban political advertising on their systems in the EU and the creation of a European repository for political advertisements are at present under-way. As more data becomes available from the Member States, a more systematic assessment of the implementation of the Regulation should be attempted. Based on institutional reports, policy studies and stakeholders’ recommendations, this briefing presented a preliminary analysis on the implementation of the TTPA focusing on five major challenges. For each of them, concrete implementation issues were identified and specific action points suggested.

Digital regulation is part and parcel of the EU’s strategic plan to protect democracy and develop a European Democracy Shield.<sup>81</sup> In this context, the thorough implementation and enforcement of the TTPA is a key step to enhance election integrity. The TTPA complements the existing EU digital rulebook – with further legislation expected in the second half of 2026 – while digital political advertising is becoming increasingly decisive for election outcomes. The EU should not backtrack on its digital governance model – resisting external pressure and the Big Tech corporations’ pressures to deregulate – but, equally, it should not be afraid to adapt the rules when they do not appear to be fit for purpose, either because of technological developments or of unintended consequences. In this regard, continuous dialogue with stakeholders – also through the Stakeholders’ platform to be launched within the European Centre for Democratic Resilience – and citizens’ feedback remain very important.

The table on page 18 provides a summary of key implementation challenges.

## Key implementation challenges, specific issues and action points

Challenges	Issues	Action points
What is (not) political advertising	Identification of issue-based advertising	Reassess pros/cons of the inclusion of issue-based advertising based on process and outcomes
Interaction with DSA and AI Act	Interaction between Art. 15 TTPA and Art. 16 DSA mechanisms Evolving governance for supervision and enforcement envisaged under the AI Act	Commission guidelines under Article 15(11) TTPA could further elaborate on applicable technical specifications regarding the mechanisms Ensure consistency and clarity in the future governance system
Towards a European repository	Self-imposed ban of political advertising by major platforms	Notwithstanding the ban, the Commission should ensure that when political advertising is published this is included in the European repository
Governance system for supervision and enforcement	Broad number and diversity of competent authorities and cooperation bodies envisaged in the TTPA and other Union legislation TTPA implementation ultimately relying on national authorities and risks of divergent interpretation of TTPA-related obligations No minimum thresholds for sanctions foreseen under the TTPA	Support the signing of administrative agreements to clarify methods of cooperation Within the 'Network of national contact points', promote consistency in the application of the TTPA, including on sanctions
The role of influencers	Facilitate compliance with obligations under the TTPA 'Minimising burdens' based on economic criteria Uncertainties in the legal framework applicable to influencers	Consider updating the 'Influencer Legal Hub' Reconsidering the legal framework applicable to influencers, including the development of a binding 'future-proof' definition

## ENDNOTES

- <sup>1</sup> The briefing has been authored by Prof. Dr. Edoardo Bressanelli, Associate Professor of Political Science, and Samuele Bernardi, Researcher, Sant'Anna School of Advanced Studies, Pisa (Italy). We are grateful to Dr. Matteo Monti for his comments.
- <sup>2</sup> European Commission, *2025 State of the Union Address by President von der Leyen*, Speech, Strasbourg, 10 September 2025. [https://ec.europa.eu/commission/presscorner/detail/en/SPEECH\\_25\\_2053](https://ec.europa.eu/commission/presscorner/detail/en/SPEECH_25_2053)
- <sup>3</sup> World Economic Forum, *The Global Risks Report 2026*. 21st edition, Cologny/Geneva, 2026, p. 9.
- <sup>4</sup> Kallas, K. *Foreward. 4th EEAS Report on Foreign Information Manipulation and Interference Threats*. March 2026, p. 2.
- <sup>5</sup> European Commission, *Foresight Report 2025. Resilience 2.0: Empowering the EU to thrive amid turbulence and uncertainty*, COM(2025) 484 final, Strasbourg, 9 September 2025, p. 5.
- <sup>6</sup> European Commission, *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Democracy Action Plan*, COM(2020) 790 final, Brussels, 3 December 2020, p. 1.
- <sup>7</sup> The importance of data – and data protection – emerged prominently in the public debate with the Cambridge Analytical scandal in 2018. This firm collected the personal data of about 87 million Facebook users without asking for their consent. Data were gathered to be exploited for political uses, reaching out voters with personalised messages through micro-targeting.
- <sup>8</sup> Fiore, E., Piccio, D. R. and A. Seddone. "Ruling the digital environment at last?" In V. Goglio & C. Biancalana (eds). *Mapping the Evolution of Platform Society. Multidisciplinary Insights from Social and Political Sciences*. Emerald, 2024, pp. 149-167.
- <sup>9</sup> Eurobarometer, *Protecting and Promoting Democracy*, November 2025, pp. 30-34. See question QC9: 'how important or not do you think the following measures are to ensure the fairness of election campaigns carried out online?'
- <sup>10</sup> European Commission, *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on securing free and fair European elections*, COM(2018) 637 final, Brussels, 12 September 2018.
- <sup>11</sup> European Commission, *European Democracy Action Plan*, cit. pp. 4-5.
- <sup>12</sup> Regulation amending Regulation (EU, Euratom) No 1141/2014 as regards a verification procedure related to infringements of rules on the protection of personal data in the context of elections to the European Parliament (Regulation 2019/493) <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019R0493>.
- <sup>13</sup> Regulation on the statute and funding of European political parties and European political foundations (Regulation 2025/2445) [https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=oj:L\\_202502445](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=oj:L_202502445).
- <sup>14</sup> European Commission and High Representative of the Union for Foreign Affairs and Security Policy, *Joint Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. European Democracy Shield: Empowering Strong and Resilient Democracies*. JOIN(2025) 791 final, Brussels, 12 November 2025, p. 5.
- <sup>15</sup> *Idem*, p. 8 and fn. 31. The Commission has issued the call for proposal for the establishment of this framework (DIGITAL-2026-BESTUSE-RSF-10) on 1 April 2026.
- <sup>16</sup> Special Committee on the European Democracy Shield, *Draft Report on the findings and recommendations of the Special Committee on the European Democracy Shield (2025/2069(INI))*, PE775.431v01-00, 18 December 2025, art. 14-16.
- <sup>17</sup> European Commission, *Communication from the Commission. Guidelines to support the implementation of Regulation (EU) 2024/900 on the transparency and targeting of political advertising*, C(2025) 6829 final, Brussels, 8 October 2025.
- <sup>18</sup> As clarified in the TTPA Guidelines (p. 8), "any direct impact on the process or outcome of political advertising or [are] provided by providers with no actual knowledge of their involvement in the political advertising production chain".
- <sup>19</sup> This is "except where the difference of treatment is justified and proportionate in accordance with Union law" (TTPA Guidelines, p. 29).
- <sup>20</sup> E.g. only paper records (TTPA Guidelines, p. 34).
- <sup>21</sup> This includes making the contact point easily accessible or providing details on the interface through which transparency notices are issued, especially when these are separate from the labels (TTPA Guidelines, p. 35).
- <sup>22</sup> Commission Implementing Regulation (EU) 2025/1410 of 9 July 2025 on the format, template and technical specifications of the labels and transparency notices of political advertisements in accordance with Articles 11 and 12 of Regulation (EU) 2024/900 of the European Parliament and of the Council, *Official Journal of the European Union*, L, 2025/1410, 16 July 2025.
- <sup>23</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC <https://eur-lex.europa.eu/eli/reg/2018/1725/oj>.
- <sup>24</sup> Recital 79 provides for a broad understanding of this requirement, as this also "encompasses using special categories of personal data evaluated from personal data which are not themselves special categories of data". In any case, these provisions should not be understood as banning communications by any political party, foundation, association or non-profit body to their members or former members, or communications related to their political activities, subject to certain conditions (Article 18(3)).
- <sup>25</sup> Recital 93 clarifies that these guidelines address the processing of special categories of personal data for the purpose of targeting or delivering political advertisements, including the conditions for obtaining consent for that purpose and the cooperation between the relevant supervisory authorities and other responsible authorities mentioned in the TTPA.
- <sup>26</sup> European Data Protection Board, "Stakeholder event on political advertising: agenda available now", 6 March 2026. [https://www.edpb.europa.eu/news/news/2026/stakeholder-event-political-advertising-agenda-available-now\\_en](https://www.edpb.europa.eu/news/news/2026/stakeholder-event-political-advertising-agenda-available-now_en). A dedicated discussion paper was circulated in advance to lay the groundwork for the discussion.
- <sup>27</sup> Monti, M., *Regolazione del discorso pubblico online e processi costituzionali di integrazione. Una comparazione UE USA*, Editoriale Scientifica, Napoli, p. 214.
- <sup>28</sup> The list of topics included in this briefing is based on a thorough review of the main positions expressed by institutional stakeholders, industry representatives, civil society organisations and academia. However, it does not pretend to be exhaustive. For instance, a topic that warrants closer attention relates to the provisions on labelling and transparency notices, most notably considering Commission Implementing Regulation (EU) 2025/1410, whose efficacy should be monitored. On this point, see also Code of Practice on Disinformation, Measure 6.3.

- <sup>29</sup> Eskens, S., “The role of the Regulation on the transparency and targeting of political advertising and European Media Freedom Act in the EU’s anti-disinformation strategy”, *Computer Law & Security Review*, 58, 2025, p. 5; Civil Liberties Union for Europe, *European Commission Discussion Points: Online Focus Group on Transparency and Targeting of Political Advertising*, 18 February 2025; Civicus Lens, “A Regulation Designed to Make Politics More Transparent Could End Up Silencing Civil Society Voices”, 20 September 2025.
- <sup>30</sup> See, e.g., the feedback by IAB Europe and EASA to the call for evidence to the Commission’s guidance on implementing EU rules on political advertising, ARES(2025)4324179, 25 June 2025.
- <sup>31</sup> European Board for Media Services, *Input into the call for evidence on guidance on implementing EU rules for political advertising*, 10 July 2025, p. 2.
- <sup>32</sup> Google, “An update on political advertising in the European Union”, 14 November 2024 <https://blog.google/company-news/inside-google/around-the-globe/google-europe/political-advertising-in-eu/>.
- <sup>33</sup> European Digital Media Observatory. *A Cross-Country Analysis of Electoral Advertising on Meta and Google during the EU 2024 Elections: Compliance, Transparency, and Targeting*. September 2025, pp. 7-8.
- <sup>34</sup> European Commission, *Commission Staff Working Document Accompanying the document Report from the Commission to the European Parliament, the Council and the European Economic and Social Committee on the application of Article 33 of Regulation (EU) 2022/2065 and the interaction of that Regulation with other legal acts*, SWD(2025) 368 final, Brussels, 17 November 2025, p. 137 and 139. This section builds on the analysis carried out by the Commission in this document. This interpretation is further confirmed by the TTPA Guidelines (p. 40).
- <sup>35</sup> In this case, it may also well occur that an ad technology provider is involved in the production chain and, as a result, both the ad technology provider and the provider of the publishing interface – which can be a website or a mobile app, for instance – are subject to obligations falling upon political advertising publishers under the TTPA (Recital 67 TTPA and TTPA Guidelines, pp. 9, 42 and 43).
- <sup>36</sup> *Code of Conduct on Disinformation*, Publications Office of the European Union, Luxembourg, 2025.
- <sup>37</sup> European 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*, *Official Journal of the European Union*, C, C/2024/3014, 26 April 2024.
- <sup>38</sup> The European Commission has launched a series of workshops “to discuss the potential benefits and implications” of such Codes. Cfr. European Commission, “European Commission Launches Workshops to Explore Voluntary Codes of Conduct for Online Advertising”, *News Article*, 11 February 2025.
- <sup>39</sup> European Commission, *Election Guidelines*, cit., para. 27(e)(iv).
- <sup>40</sup> European Parliament, *Answer given by Mr McGrath on behalf of the European Commission*, E-000158/2026(ASW), 27 March 2026.
- <sup>41</sup> European Commission, *Election Guidelines*, cit., para. 27(e)(iii).
- <sup>42</sup> If these mechanisms are not available, individuals should be able to report such political advertisements directly to the competent authorities (Recital 69 TTPA).
- <sup>43</sup> Pursuant to Article 15(4) DSA, to give rise to actual knowledge or awareness triggering the liability for the provider of hosting services, the illegality of the content should be identifiable without a detailed legal examination (e.g. via a decision of a competent national authority).
- <sup>44</sup> For further clarity, the TTPA Guidelines (p. 41) provide a concrete example illustrating the interaction between Article 15 TTPA and Article 16 DSA, in which the ‘notice and action mechanism’ is activated on a specific platform to remove an advertisement that was already taken down from another platform because it was deemed illegal by a competent authority.
- <sup>45</sup> European Commission, *Report*, cit., p. 142.
- <sup>46</sup> *Ibid.*, p. 141.
- <sup>47</sup> *Ibid.*
- <sup>48</sup> Some derogations are provided in Article 6(3) AI Act.
- <sup>49</sup> European Commission, *Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) 2024/1689 and (EU) 2018/1139 as regards the simplification of the implementation of harmonised rules on artificial intelligence (Digital Omnibus on AI)*, COM(2025) 836 final, Brussels, 19 November 2025.
- <sup>50</sup> ‘LLM grooming’ describes the act of intentionally spreading false claims online, aiming for these to be included in AI training data or indexed by chatbot-connected search engines. For a recent example, cfr. EDMO, *Weekly Pulse*, 1 April 2026.
- <sup>51</sup> See European Commission, *Implementing Regulation (EU) 2026/818 setting out detailed arrangements for the provision of a common data structure, standardised metadata, standardised authentication and common application programming interface for the European repository for online political advertisements in accordance with Regulation (EU) 2024/900*, 9 April 2026, Annex, paragraph I art. 3.
- <sup>52</sup> European Board for Media Services, *Input into the call for evidence*, pp. 2-3. *Who Targets Me, Input into the call for evidence on Political Advertising – detailed arrangements for the European repository for online political advertising*, ARES(2025)11556145, 23 December 2025.
- <sup>53</sup> In this context, it is relevant that the Commission has issued its first fine (of €120 million) under the DSA to X for failing to meet, *inter alia*, transparency and accessibility requirements to its ads repository.
- <sup>54</sup> For an overview of the field in the early phases of the regulatory process, see European Partnership for Democracy, *The case for universal transparency of political campaigns over ad libraries*, March 2022.
- <sup>55</sup> The Briefing, “Google just erased 7 years of our political history”, 28 September 2025, available at <https://www.thebriefing.ie/google-just-erased-7-years-of-our-political-history/> For the Google Ads Transparency Centre, see <https://adstransparency.google.com/political?region=IT&topic=political> (last accessed on 8 April 2026).
- <sup>56</sup> Votta, F., *What data reveals about Meta and Google’s political ad ban in the EU*. Tech Policy Press, 3 November 2025. Available at: <https://www.techpolicy.press/what-data-reveals-about-meta-and-googles-political-ad-ban-in-the-eu/>.
- <sup>57</sup> See, e.g., Civil Liberties Union for Europe, *Hungary’s Online Political Advertising Market in Transition*, 9 March 2026 and 3 November 2025; EDMO, *The Endgame for Hungary: Disinformation, AI, Prohibited Ads and Russian Interferences in the Election Campaign*, 1 April 2026; Resendiz-Eyler, J., *How Political Advertising is Adapting Ahead of Hungary’s 2026 Elections*, Liberties, 17 March 2026. Available at: <https://www.liberties.eu/en/stories/political-advertising-hungary-elections/45607>; Lakmusz, “Circumventing Meta’s ban with AI-generated campaign videos and super forecasting of Fidesz’s defeat”, 9 March 2026. Available at: <https://edmo.eu/publications/circumventing-metas-ban-with-ai-generated-campaign-videos-and-super-forecasting-of-fideszs-defeat/>.
- <sup>58</sup> *Ibid.*

- <sup>59</sup> Art. 22(1), Art. 58 of Regulation (EU) 2016/679 and Art. 58 of Regulation (EU) 2018/1725 shall apply *mutatis mutandis*.
- <sup>60</sup> The TTPA cross-references the application of relevant DSA provisions concerning the designation of national authorities and DSCs (Article 49 DSA), the powers granted to the DSCs (Article 51 DSA), as well as cross-border cooperation and joint investigations (Articles 58(1) to (4) and 60(1) DSA).
- <sup>61</sup> Specific obligations to provide information to the Network of national contact points in case of cross-border cooperation are set out in the Regulation.
- <sup>62</sup> Becker Castellaro, S., Lleshi, G. and Juliane Müller, *Navigating the European Union's Digital Regulatory Framework: Part 1. A Compact Overview of Its Impact on Electoral Processes*, International IDEA, Stockholm, 2025, p. 42.
- <sup>63</sup> European Commission, *Report, cit.*, p. 136.
- <sup>64</sup> European Commission, *Rules of Procedure for the Committee on the implementation of the Regulation on Transparency and Targeting of Political Advertising*, Ares(2024)84899091, 28 November 2024.
- <sup>65</sup> European Commission, *Informal Commission Expert Group. Expert Group of Providers of Political Advertising Services. Terms of Reference*, Ares(2025)9525862, 5 November 2025.
- <sup>66</sup> Civil Liberties Union for Europe, *Feedback on the draft Commission Implementing Regulation on the European repository for online political advertisements*, 23 January 2026, para. 3. Available at: [https://www.liberties.eu/f/\\_9mf4h](https://www.liberties.eu/f/_9mf4h).
- <sup>67</sup> *Terms of Reference. European cooperation network on elections*, p. 2.
- <sup>68</sup> In particular, the reference is here to the meetings that took place on 4 July 2025, 23 July 2025 and 29 September 2026. At the July 2025 meeting, the Commission proposed considering the establishment of a dedicated Working group on political campaigning. At the time of writing, no information is provided on the relevant [Commission webpage](#) regarding the setup of such a working group within ECNE.
- <sup>69</sup> European Board for Digital Services, *Annual Work Plan. Q4/2025 to Q4/2026*, p. 3.
- <sup>70</sup> European Board for Media Services, *Input into the call for evidence on guidance on implementing EU rules for political advertising*, 10 July 2025, p. 3.
- <sup>71</sup> Pursuant to Art. 25(6) and (7), the relevant provisions enshrined in Regulation (EU) 2016/679 and Regulation (EU) 2018/1725 apply to infringements of obligations regarding targeting and ad-delivery techniques.
- <sup>72</sup> Stegher, G., "La comunicazione politica nella digital era", in Califano, L., Fabrizzi, F. and Sartor, G. (eds.), *Disinformazione digitale. Modelli algoritmici e valori democratici*, FrancoAngeli, Milan, 2026, p. 259.
- <sup>73</sup> European Board for Media Services, *Input into the call for evidence, cit.*, p. 3.
- <sup>74</sup> European Commission, "Influencer Legal Hub". [https://commission.europa.eu/topics/consumers/consumer-rights-and-complaints/influencer-legal-hub\\_en](https://commission.europa.eu/topics/consumers/consumer-rights-and-complaints/influencer-legal-hub_en).
- <sup>75</sup> Dubois, E. and K. Domett, "Reconceptualising political influencers: An alternative means of definition and analysis", *New Media & Society*, 2025, pp. 8 ff. <https://doi.org/10.1177/14614448251395272>.
- <sup>76</sup> Recommendation of the Committee of Ministers to member States on online safety and empowerment of users and content creators (Adopted by the Committee of Ministers on 8 April 2026 at the 1556th meeting of the Ministers' Deputies), CM/Rec(2026)4, 8 April 2026, para. 31.
- <sup>77</sup> European Board for Media Services, *WS3 – The regulation of influencers*, 19 December 2025, p. 17. The Council provided a non-binding definition of influencer in its recent conclusions on support for influencers as online content creators, adopted in May 2024 (p. 13).
- <sup>78</sup> Special committee on the European Democracy Shield, *Draft Report, cit.*, Whereas M and N and para. 21.
- <sup>79</sup> Council conclusions on support for influencers as online content creators, *Official Journal of the European Union*, C, C/2024/3807, 23 July 2024, Annex. For the work undertaken by NRAs on influencers, see for instance AGCOM, *Modifiche alle Linee Guida di cui alla Delibera N. 7/24/CONS e approvazione del Codice di condotta rivolto agli influencer* [Guidelines and Code of Conduct for influencers], 197/25/CONS, 23 July 2025.
- <sup>80</sup> European Commission, *Call for Evidence for an Impact Assessment*, Ares(2025)5829481, 17 July 2025, p. 2.
- <sup>81</sup> See Bressanelli, E. *European Democracy Shield. Assessing the Commission's Communication*, Briefing, PE 780.253, December 2025.

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IUST/2026/B/EUDS/IC/006

Print      ISBN 978-92-848-3623-9 | doi:10.2861/8029089 | QA-01-26-113-EN-C  
PDF      ISBN 978-92-848-3622-2 | doi:10.2861/6855549 | QA-01-26-113-EN-N