



VELLUM
INTELLIGENCE

DSA Enforcement Monitor

15–27 March 2026

PREPARED FOR

Public sample

DATE OF ISSUE

27 March 2026

CLASSIFICATION

Sample



DSA Enforcement Brief

SCOPE / COVERAGE

2026-03-15 to 2026-03-27

DATE

2026-03-27

CLASSIFICATION

Vellum Intelligence — Sample

BOTTOM LINE

The period 15–27 March 2026 produced the densest cluster of DSA enforcement activity since the regulation's full application began. On 26 March alone the Commission opened formal proceedings against Snapchat and issued preliminary breach findings against four adult content platforms — all centred on minors protection obligations. Taken together with the pre-window TikTok addictive design preliminary findings (6 February) and Shein formal proceedings (17 February), the enforcement pattern now clearly favours systemic-risk and minors-safety as the dominant supervisory priority. Platforms with age assurance, recommender system, or minor-safety obligations should treat the current enforcement trajectory as a live compliance signal, not a background risk.

WHAT CHANGED SINCE LAST BRIEF

New this period:

- Commission opened formal proceedings against Snapchat under DSA Articles 34–35 for suspected failures in age assurance, minors safety, grooming risk, and illegal goods access (26 March 2026), absorbing a prior Dutch DSC investigation.
- Commission issued preliminary findings that Pornhub, Stripchat, XNXX, and XVideos are in breach of DSA systemic-risk and age assurance obligations for failing to prevent minor access to adult content (26 March 2026).
- IMCO Committee held an exchange of views with AliExpress representatives on the ongoing DSA investigation into illegal goods, recommender system transparency, and product safety (23 March 2026).
- IMCO hosted US Congressman Jamie Raskin on 24 March 2026 to discuss US political attacks on the DSA, signalling active Parliamentary defence of the EU digital framework against transatlantic pressure.

Materially changed:

- The Commission's DSA enforcement posture has materially escalated: two major Commission enforcement steps were issued in the 15–27 March window, both on 26 March and both focused on minors safety. This was one of the highest-density minors-safety enforcement moments since DSA full application to VLOPs began.

Still open / unchanged:

- Commission preliminary findings against TikTok for addictive design (Articles 34–35, 6 February 2026): TikTok is in the right-of-defence phase; no non-compliance decision yet.
- Commission formal proceedings against Shein (17 February 2026): three-strand investigation into illegal content, dark patterns, and recommender system transparency — still open, no findings issued.



- Commission proceedings against X/Grok for systemic risk related to non-consensual synthetic imagery (26 January 2026): investigation ongoing; Virkkunen confirmed status in Parliamentary written answers published within the coverage window (18–19 March 2026).
- X's appeal of its €120 million DSA non-compliance fine (December 2025, first-ever DSA fine) is ongoing before the EU courts.
- Berlin court order requiring X to provide researcher data access to Democracy Reporting International (DRI) for Hungarian election monitoring: February 2026 ruling in DRI's favour, compliance status not confirmed within coverage window.

EXECUTIVE SUMMARY

The coverage period was defined by a concentrated burst of Commission enforcement action under the DSA's systemic-risk and minors-protection obligations. On 26 March, the Commission opened formal proceedings against Snapchat across five areas including age assurance, grooming risk, and illegal goods — simultaneously absorbing an earlier Dutch DSC investigation. On the same day, it issued preliminary breach findings against four adult content platforms (Pornhub, Stripchat, XNXX, XVideos) for inadequate age assurance and deficient systemic-risk assessments, signalling that self-declaration mechanisms will not satisfy Articles 34–35 for platforms with high-risk minor exposure. These developments accelerate an already active enforcement docket: TikTok's addictive design preliminary findings (February) and Shein's formal proceedings (February) remain open, and the X/Grok systemic-risk investigation continues. The IMCO Committee's engagement with AliExpress (23 March) and its session with a US Democrat defending the DSA against Republican attacks (24 March) confirm that Parliamentary scrutiny of both platform compliance and transatlantic regulatory pressure is intensifying.

CLIENT EXPOSURE [SAMPLE - GENERIC]

RELEVANCE
HIGH

The current enforcement cycle directly implicates the DSA's systemic-risk framework (Articles 34–35) and minors-protection obligations as the Commission's primary supervisory priorities. Any VLOP or VLOSE with a user base that includes minors, recommender systems, age assurance mechanisms, or user-generated content faces a materially elevated enforcement risk profile.

Direct exposure: VLOPs and VLOSEs with recommender systems, age assurance obligations, or content accessible to minors are directly in scope of the enforcement trajectory confirmed this period. Platforms providing user-generated content, social features, or product search with algorithmic ranking are directly implicated by the AliExpress, TikTok, and Shein proceedings across Articles 27, 34, 35, and 38. Generative AI features integrated into VLOP services are directly in scope of the X/Grok systemic-risk proceedings.

Indirect exposure: Technology suppliers to VLOPs — including age verification infrastructure providers, recommender system vendors, and content moderation tooling companies — face indirect compliance pressure as platforms move to address Commission findings. Platforms currently not designated as VLOPs may face NCA-level scrutiny that mirrors Commission posture if national DSCs align their supervisory priorities accordingly.

Immediate action need: YES

Immediate actions:

- Audit age assurance mechanisms against the Commission's stated standard: self-declaration alone does not satisfy Articles 34–35 for platforms with material minor-user populations. Any platform relying solely on self-declaration should treat it as a compliance gap pending formal findings.



- Review systemic-risk assessments (Article 34 annual cycle) to confirm they address all active Commission enforcement themes: addictive design features, recommender system harms, age-related access risks, and content accessible to minors. Assessments that are generic, business-centric, or that underweight societal harms are the explicit basis for the preliminary findings against the adult platforms and TikTok.
- Review recommender system transparency documentation (Article 27/38) against the Shein and TikTok proceedings to confirm that both the Commission and users can verify non-profiling alternatives exist and function.
- For platforms with integrated generative AI features: assess whether the systemic-risk framework adequately covers AI-generated content risks, including synthetic imagery. The X/Grok proceedings set the precedent that AI feature integration is within VLOP systemic-risk scope.
- For platforms under active investigation or with recent audits: confirm that independent audit reports (Article 37) have been submitted and are compliant. The Commission is referencing audit and risk assessment quality directly in its preliminary findings.

KEY DEVELOPMENTS

1. The Commission opened formal proceedings against Snap Inc

STATUS	CONFIDENCE	DATE	ACTOR
[formal proceedings opened — five-area investigation]	[HIGH CONFIDENCE]	26 March 2026	European Commission

The Commission opened formal proceedings against Snap Inc. under DSA Articles 34–35 (systemic risk) to investigate whether Snapchat is ensuring a high level of safety, privacy, and security for children. The investigation covers five areas: (1) age assurance — adequacy of self-declaration as an age gate for under-13s and under-17s; (2) grooming and recruitment of minors for criminal activities; (3) access to illegal goods (drugs, illicit vapes, alcohol); (4) a specific tool for reporting under-13 users allegedly unavailable in the app; and (5) an unnamed fifth area not disclosed in public documents. The Commission simultaneously absorbed the parallel Dutch DSC (ACM) investigation launched 9 September 2025 into vape sales to minors on Snapchat. [S01][S02][S03]

Current legal position: Formal proceedings are now open. Formal proceedings empower the Commission to adopt interim measures, issue a non-compliance decision, and accept platform commitments. No finding of breach has been made — this is the investigation stage. Snap has publicly stated it will cooperate with the investigation.

Likely landing zone: *[Assessment] The five-area scope and the absorption of the Dutch DSC investigation signal that the Commission assessed sufficient evidence to proceed to formal proceedings rather than issue a preliminary RFI or await DSC-level resolution. The most probable enforcement trajectory is: a period of investigation and document review, followed by interim measures or preliminary findings if Snap does not proactively remediate. The self-declaration age assurance point is analytically the most significant — the Commission has already signalled in the adult platforms case (D2) that self-declaration is insufficient, and that position is now active across two separate proceedings. The fifth undisclosed investigation area may relate to transparency reporting or recommender systems, based on prior Commission enforcement patterns.*

Why it matters now: *The Snapchat proceedings confirm that the Commission is applying a consistent age-assurance standard: self-declaration does not satisfy the systemic-risk and minor-safety obligations under Articles 34–35. Any VLOP or VLOSE with a user base that materially includes minors and relies on*



self-declaration as its primary age gate should treat this as a direct enforcement signal. The absorption of the Dutch DSC investigation also demonstrates the Commission's willingness to centralise enforcement where national DSC actions are active.

Assessment: *This proceeding is analytically significant beyond its immediate subject. The Commission is now running simultaneous formal proceedings against Snapchat and preliminary findings against four adult platforms — all on age assurance and minors safety — in the same week. That is not coincidence; it is a deliberate enforcement sequencing. The practical implication is that the Commission has established a working theory of what adequate age assurance requires (privacy-preserving technical verification, not behavioural inference or self-declaration) and is applying it consistently across very different platform types. Snapchat's position is complicated by the demographic reality of its user base, which skews younger than most comparable platforms, and by the fact that its existing safeguards (mutual-friend requirements, teen-mode defaults) have been publicly characterised as insufficient in preliminary press materials. The investigation will likely produce either a negotiated commitment package or preliminary findings within six to twelve months.*

Evidence: Confirmed by Commission official press release and Commission digital strategy page (reliability A). Corroborated by multiple secondary sources. The fifth investigation area is not publicly disclosed — noted as a confirmed unknown.

2. The Commission issued preliminary findings that Pornhub, Stripchat, XNXX, and XVideos are in breach of DSA Articles 34–35 for failing to protect minors from accessing pornographic content

STATUS	CONFIDENCE	DATE	ACTOR
[preliminary findings of breach — right of defence phase]	[HIGH CONFIDENCE]	26 March 2026	European Commission

The Commission issued preliminary findings that Pornhub, Stripchat, XNXX, and XVideos are in breach of DSA Articles 34–35 for failing to protect minors from accessing pornographic content. The findings, based on a ten-month investigation launched May 2025, conclude that: (1) all four platforms allow minor access via self-declaration (a single click confirming age-18); (2) risk assessments were inadequate — disproportionately emphasising business-centric concerns such as reputational damage rather than societal risks to minors; (3) Stripchat, XVideos, and XNXX misrepresented or failed to consider meetings with civil society organisations specialising in children's rights and age verification in their risk assessments. The Commission's position is that privacy-preserving age verification measures are required. Platforms now have the right to access Commission investigation files and respond in writing. Confirmed breaches can attract fines up to 6% of global annual turnover.

[S04][S05][S06][S07]

Current legal position: Preliminary findings issued — not a final decision. The four platforms retain the right of defence: they may review evidence, respond in writing, and take remedial measures. If the Commission confirms its findings and issues a non-compliance decision, fines up to 6% of global annual turnover apply. This is the same procedural stage that preceded the first DSA fine against X (December 2025).

Likely landing zone: *[Assessment] The preliminary findings are substantively strong — the Commission's self-declaration position is explicit and leaves limited room for platforms to argue sufficiency of existing measures. The most probable outcome is either a negotiated commitment package (with binding age-verification implementation commitments) or a non-compliance decision with a fine. The precedent from X suggests the Commission is willing to proceed to a fine where platforms do not remediate. Stripchat, Pornhub, XNXX, and XVideos are smaller in terms of EU-facing revenue than X, and their practical leverage in negotiations is correspondingly lower. A non-compliance decision within 12–18 months appears the more probable outcome absent proactive remediation.*



Why it matters now: *The Commission has now stated explicitly that self-declaration age gates do not satisfy DSA systemic-risk obligations for platforms where minor access creates serious harm risk. This is not a sector-specific finding — it is a cross-platform standard now applied in formal proceedings and preliminary findings simultaneously. Any platform that relies on user self-declaration as its primary age assurance mechanism, regardless of sector, should treat this as a binding compliance signal.*

Assessment: *These preliminary findings establish the Commission's working theory of Article 34–35 compliance for high-risk platforms: risk assessments must be genuinely societal-harm-focused, methodologically objective, and reflected in technical mitigation measures proportionate to the risk. The explicit criticism of business-centric risk assessments is significant beyond the adult content sector — the same framing appeared in the TikTok addictive design preliminary findings. The Commission is developing a consistent evidentiary standard for what an adequate DSA risk assessment looks like, and systematically rejecting assessments that map risk to commercial exposure rather than user harm. Platforms across all VLOP categories should review their Article 34 risk assessment documentation against this emerging standard.*

Evidence: Confirmed by Commission press release and Commission digital strategy page (reliability A). Corroborated by Biometric Update, Politico, Le Monde, and CADE project summary (reliability B/C). The investigation was launched May 2025 — this development falls clearly within the coverage window as the preliminary findings date is 26 March 2026.

3. The IMCO Committee held a structured exchange of views with AliExpress (represented by Alibaba Group VP Eric Pelletier) on 23 March 2026, focusing on the systemic sale of unsafe and illegal goods on the platform

STATUS	CONFIDENCE	DATE	ACTOR
[parliamentary scrutiny — Commission DSA investigation ongoing since March 2024]	[HIGH CONFIDENCE]	23 March 2026	European Parliament, IMCO Committee / AliExpress (Alibaba Group)

The IMCO Committee held a structured exchange of views with AliExpress (represented by Alibaba Group VP Eric Pelletier) on 23 March 2026, focusing on the systemic sale of unsafe and illegal goods on the platform. The exchange follows IMCO's designation of e-commerce compliance as a standing agenda item. AliExpress acknowledged ongoing challenges and cited an independent audit finding 'substantial improvements' in 92% of assessed areas, but confirmed that illegal listing reappearance and seller non-compliance remain unresolved. MEPs pressed on recommender system amplification of unsafe goods. The Commission's formal DSA investigation against AliExpress, opened March 2024, focuses on systemic-risk obligations relating to illegal products.

[S08][S09]

Current legal position: The Commission opened formal DSA proceedings against AliExpress in March 2024. On 18 June 2025, it accepted binding commitments from AliExpress and also issued preliminary findings on certain illegal-product risks. The 23 March 2026 IMCO exchange is parliamentary scrutiny and does not itself alter the Commission's formal enforcement posture.

Likely landing zone: *[Assessment] AliExpress is no longer in a simple pre-findings investigative stage: the Commission accepted commitments and issued preliminary findings in June 2025. The March 2026 IMCO exchange instead matters as a political and supervisory signal that concerns about illegal and unsafe goods remain live despite those earlier Commission steps.*

Why it matters now: *The IMCO session confirms that the EU institutional environment for e-commerce DSA compliance extends beyond the Commission's investigation: Parliamentary committees are maintaining active scrutiny, making AliExpress's compliance position politically as well as legally exposed. For platforms with marketplace business models and recommender-driven product discovery, the IMCO focus on*



algorithmic amplification of illegal goods signals that recommender system transparency (Articles 27/38) is a live enforcement priority alongside systemic-risk obligations.

Assessment: *The AliExpress session is analytically valuable as a signal of the pace and character of the Commission's investigation. The fact that the Commission had already accepted commitments and issued preliminary findings by June 2025 means the March 2026 IMCO session should be read not as evidence of procedural delay, but as evidence that AliExpress remains under sustained political and supervisory pressure. The IMCO hearing, by surfacing AliExpress's own acknowledgement of ongoing non-compliance, creates public-record evidence that the platform has not resolved the issues at the centre of the investigation. This may affect the Commission's assessment of AliExpress's cooperative posture as it evaluates compliance with the commitments already made binding and the issues identified in the preliminary findings.*

Evidence: IMCO exchange confirmed by EU Perspectives report and IMCO newsletter (reliability A/B). AliExpress designation as VLOP and March 2024 proceedings opening confirmed by multiple secondary sources. No Commission primary source for the IMCO session outcome is available — the hearing was not accompanied by a Commission press release.

4. Executive Vice-President Virkkunen published written answers to Parliamentary questions E-000114/2026 and E-000099/2026 on 18–19 March 2026, confirming that the Commission opened new DSA proceedings against X on 26 January 2026 to investigate systemic risks associated with the integration of the Grok AI assistant into the X platform

STATUS	CONFIDENCE	DATE	ACTOR
[active proceedings confirmed — Parliamentary question answers published]	[HIGH CONFIDENCE]	18–19 March 2026	European Commission (EVP Virkkunen), European Parliament

Executive Vice-President Virkkunen published written answers to Parliamentary questions E-000114/2026 and E-000099/2026 on 18–19 March 2026, confirming that the Commission opened new DSA proceedings against X on 26 January 2026 to investigate systemic risks associated with the integration of the Grok AI assistant into the X platform. The investigation focuses on whether X properly assessed and mitigated risks related to: non-consensual synthetic explicit imagery (including material that may constitute CSAM), gender-based violence, and the physical and mental well-being of users. Virkkunen confirmed that if X is found to breach the DSA, fines up to 6% of worldwide annual turnover may be imposed.

[S10][S11][S03]

Current legal position: Formal proceedings against X for Grok systemic risks are open (since 26 January 2026). This is a separate and distinct proceeding from the December 2025 non-compliance fine against X for ad transparency failures. X is simultaneously: (1) subject to ongoing proceedings on Grok systemic risks; (2) appealing its €120 million DSA fine; and (3) the subject of a Berlin court order to provide researcher data access. The January 2026 proceedings are at the investigation stage — no preliminary findings have been issued.

Likely landing zone: *[Assessment] The X/Grok investigation is analytically significant as the first formal DSA proceeding targeting AI feature integration within a VLOP. The systemic-risk framing — requiring X to have assessed and mitigated risks before deploying Grok features — sets a precedent for how the Commission approaches AI capability additions to VLOPs generally. Given X's prior non-compliance record and ongoing adversarial posture toward EU regulation, a negotiated commitment package appears less probable than for other platforms. Preliminary findings are assessed as likely within the next six to twelve months.*

Why it matters now: *These Parliamentary answers are within the coverage window and confirm the active status of the X/Grok proceedings for compliance planning purposes. More broadly, the proceedings establish that adding AI generative capabilities to a VLOP triggers DSA systemic-risk obligations — platforms must assess and mitigate risks before deployment, not reactively. Any VLOP integrating or planning to integrate generative AI features should treat this as a binding compliance signal.*



Assessment: *The X/Grok case is the Commission's most significant expansion of DSA systemic-risk doctrine since the regulation's full application to VLOPs began. The investigation is not about content moderation failure after the fact — it is about whether X adequately assessed systemic risks before integrating Grok into its platform. This pre-deployment risk assessment requirement, applied to AI feature integration, extends DSA Articles 34–35 into product development decision-making. The implications extend beyond X: any VLOP that has integrated or is integrating generative AI tools faces the same obligation to conduct and document a systemic-risk assessment for that feature. The investigation is also significant because it treats AI-generated CSAM-adjacent content as a DSA systemic-risk matter, not merely a content removal obligation — meaning platform architecture and mitigation design are in scope, not just notification-and-action compliance.*

Evidence: Confirmed by EP official published written answer documents (reliability A). Virkkunen answers to E-000114/2026 (18 March) and E-000099/2026 (9 March) and related questions corroborated by Policy Insider analysis (reliability B).

⚡ PRE-WINDOW — OPERATIVE ELEMENT IN THIS PERIOD

5. The Commission issued preliminary findings on 6 February 2026 that TikTok's addictive design features breach DSA Articles 34–35

STATUS	CONFIDENCE	DATE	ACTOR
[preliminary findings issued — right of defence phase, non-compliance decision pending]	[HIGH CONFIDENCE]	6 February 2026	European Commission

The Commission issued preliminary findings on 6 February 2026 that TikTok's addictive design features breach DSA Articles 34–35. The findings identify specific platform features as creating systemic risk to users' physical and mental well-being: infinite scroll, autoplay, highly personalised recommender systems, and persistent push notifications. The Commission concluded that TikTok's risk assessment methodology was inadequate — it failed to employ objective and thorough methodologies, and even where TikTok had adopted user-side tools (screen-time limits, time-management prompts), the Commission found these insufficient where the risk is embedded in the service's fundamental design architecture. TikTok settled related US social media addiction litigation before trial during the same period.

[S12][S13][S14]

Current legal position: Preliminary findings are issued. TikTok is in the right-of-defence phase: it may review evidence, respond to Commission findings, and implement remedial measures. If findings are confirmed, a non-compliance decision and fine of up to 6% of global annual turnover may follow. This is the second set of TikTok preliminary findings — the first (October 2025) concerned transparency obligations.

Likely landing zone: *[Assessment] TikTok's addictive design case is analytically distinct from its transparency case: the Commission is challenging core product architecture, not disclosure compliance. This makes negotiated commitments structurally more complex — TikTok would need to commit to design changes affecting its engagement model. Given that TikTok has demonstrated some willingness to implement safeguards (minor-mode, screen-time defaults), a negotiated path involving binding design commitments with audit oversight appears probable. A full non-compliance decision on addictive design would set a landmark DSA precedent affecting the entire VLOP ecosystem.*

Why it matters now: *The preliminary findings are operative for compliance planning within this coverage window because TikTok has not remediated and no commitment package has been announced. The Commission's standard — that generic user-side tools do not mitigate risk where the risk is embedded in design — directly affects any VLOP whose engagement model relies on infinite scroll, autoplay, or algorithmic feed personalisation. This is not limited to social media platforms; any VLOP with a content discovery surface must assess whether its design architecture creates comparable systemic risks.*

Assessment: *The TikTok addictive design case is the most analytically consequential pending DSA enforcement matter for the broader VLOP ecosystem. The Commission has moved from challenging what*



platforms say about risk (transparency) to challenging how platforms are designed (architecture). The standard being developed — that risk assessment must be methodologically objective, societal-harm-focused, and reflected in proportionate technical mitigation at the design level — is now being applied consistently across TikTok, the adult platforms, Shein, and Snapchat. This convergence is not coincidental; it reflects a deliberate supervisory theory that DSA Articles 34–35 require structural mitigation of design-embedded risks, not just reactive content moderation or user-facing informational tools.

Evidence: Commission press release of 6 February 2026 is the primary source (reliability A); confirmed by DSA Observatory and Digital Policy Alert analysis (reliability B). This development predates the coverage window but its right-of-defence status and enforcement implications are active and unresolved within the window.

DECISION POINTS — NEXT 30 / 60 / 90 DAYS

WINDOW	EVENT	WHY IT MATTERS	OWNER
Next 30 days	TikTok right-of-defence response: TikTok's written response to Commission preliminary findings on addictive design is expected. If TikTok proposes binding commitments, the Commission may suspend the formal procedure. If not, a non-compliance decision can follow.	A TikTok commitment package on addictive design would set the first DSA standard for design-level systemic-risk mitigation — directly binding on TikTok and influential for all other VLOPs with comparable features. A non-compliance decision would set a precedent that could expose any VLOP with infinite scroll/autoplay to enforcement.	Legal / Policy / Product
Next 60 days	Snapchat proceedings: Commission may issue interim measures or request additional information. Snap's stated intention to cooperate may accelerate to a negotiated commitment package.	If the Commission accepts commitments from Snap on age assurance, those commitments will define the practical compliance standard for minor-safety age gates across the VLOP category. If proceedings escalate to interim measures, it would be the Commission's first use of DSA interim measures powers.	Legal / Policy / Product
Next 60 days	Adult platforms right-of-defence: Pornhub, Stripchat, XNXX, and XVideos must respond to Commission preliminary findings. Platforms that implement privacy-preserving age verification prior to a non-compliance decision may avoid a fine.	The Commission's stated position — that privacy-preserving age verification is required — will either be reinforced (if platforms comply) or tested (if platforms contest). Either outcome establishes the operational standard for Article 34–35 compliance for high-risk minor-safety platforms.	Legal / Compliance
Next 90 days	AliExpress: following the Commission's 18 June 2025 decision accepting binding commitments and issuing preliminary findings, the next key	The AliExpress case is already helping to establish the DSA enforcement standard for marketplace platforms with high-volume third-party seller	Legal / Policy



	question is whether the Commission signals further enforcement, compliance concerns, or follow-up action if illegal and unsafe goods risks persist.	models, and any further Commission follow-up would sharpen that standard further for platforms operating marketplaces with user-generated product listings.	
Next 90 days	X/Grok investigation progress: Commission has confirmed proceedings since 26 January 2026; six months into the investigation, preliminary findings or interim measures are within the enforcement timeline.	The first formal DSA enforcement outcome against AI feature integration in a VLOP will set the systemic-risk assessment standard for all VLOPs deploying generative AI capabilities. The outcome is directly relevant to any VLOP that has added or is planning to add AI-generated content or conversational AI features.	Legal / Policy / Product

ANALYTICAL CAVEATS

D5 (TikTok addictive design preliminary findings, 6 February 2026) predates the coverage window and is classified as pre_window_live. The right-of-defence period is active and unresolved within the window — its enforcement implications are live compliance matters.

The X fine figure is cited as €120 million in multiple sources referencing X's filed appeal, and as €40 million in some secondary sources. The €120 million figure is used here as it is consistently supported by sources referencing the appeal proceedings. The exact figure is not independently confirmed from a Commission press release primary source within the coverage window.

AliExpress: no Commission primary source is available for the content of the 23 March IMCO session outcome. The EU Perspectives report and IMCO newsletter are used as the primary sources for this development. The Alibaba representative's statements are reported speech, not primary documentation.

The fifth investigation area in the Snapchat proceedings has not been publicly disclosed by the Commission. Its characterisation as possibly relating to transparency or recommender systems is analytical inference based on prior enforcement patterns.

The Berlin court order requiring X to provide researcher data access to DRI is noted in the 'still open/unchanged' section. Compliance status as of 27 March 2026 has not been confirmed from primary sources and is therefore not included as a key development.

SOURCE RATING LEGEND

[A] Primary — official document, court record, institutional press release, legislative text, regulatory decision

[B] Secondary credible — established news outlet, reputable think tank, law firm alert, verified civil society organisation

[C] Secondary unverified — single journalist or blog, unconfirmed reporting, informal channel, anonymously sourced

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