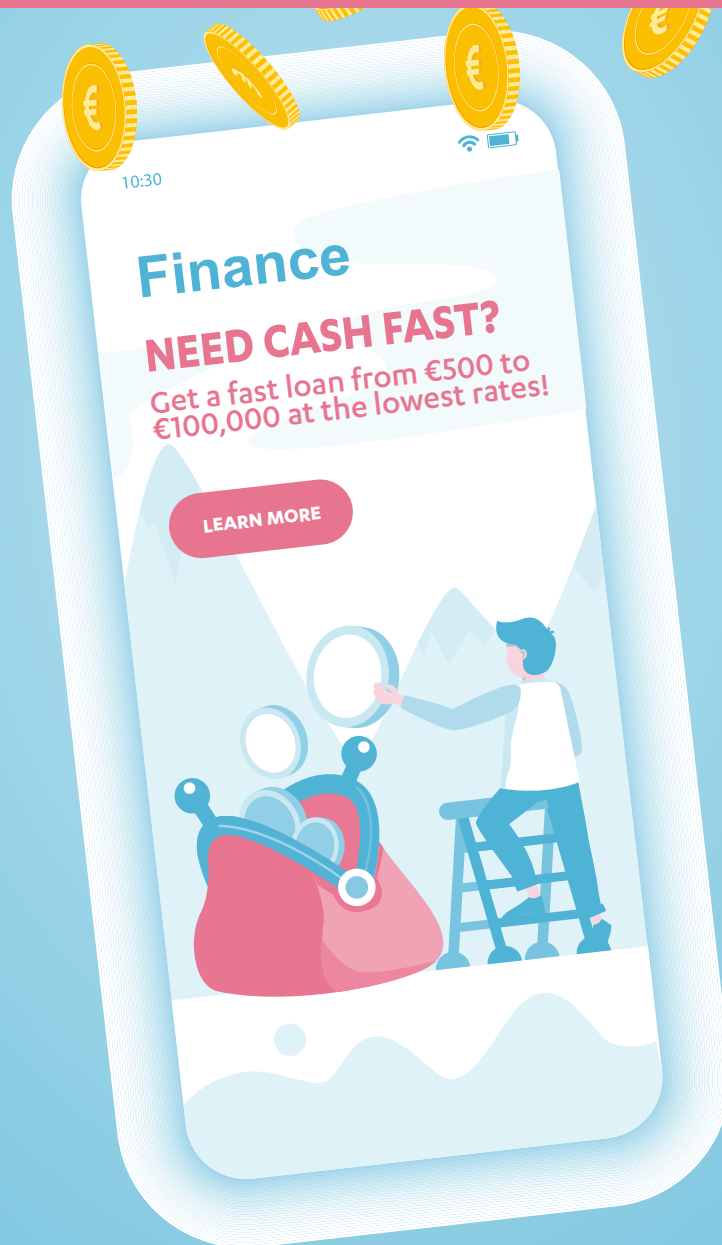


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The European Consumer Organisation (BEUC) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents more than 40 independent national consumer organisations from over 30 European countries. Together with our members, we inform EU policies to improve people's lives in a sustainable and fair economy and society.

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BEUC-X-2026
May 2026



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SUMMARY

What this complaint is about and why it matters for consumers

Consumers spend more time online and increasingly rely on digital payment services in their daily lives. As their digital presence grows, so do fraudulent practices, with online advertising emerging as a major vector for scams. Whether watching videos, following friends, scrolling or reading the news, consumers are routinely exposed to increasingly sophisticated fraud schemes, leading not only to financial harm – i.e. in 2024, consumers suffered financial losses up to EUR 4.2 billion – but also to a loss of trust in digital and financial markets.

Under the EU's Digital Services Act (DSA), online platforms are required to mitigate risks stemming from fraudulent contents by providing (among other things) transparency about the ads and advertisers on their interfaces, easy ways to report scams and by ensuring that scammers are removed from the platform.

Between December 2025 and March 2026, BEUC and 13 consumer organisations conducted large-scale evidence-gathering in 13 countries. The findings show that financial scams remain widespread on Meta, TikTok, and Google, and that platforms systematically fail to take effective corrective actions. In many cases, consumer groups found alarming discrepancies between what platforms claim to do and the reality of what is happening on their interfaces. Therefore, consumer organisations filed this complaint with the European Commission and the competent national authorities in May 2026 and highlighted breaches of Art. 16, 20, 23, 24, 25, 34, 35 and 39 DSA.

Our demands to the European Commission and competent national authorities

Consumer organisations call on the European Commission and national Digital Services Coordinators (DSCs) to:

- Launch, or where applicable accelerate,¹ investigations into Meta, TikTok, and Google's DSA compliance and the measures taken by these platforms to mitigate risks related to financial scams.
- Require Meta, TikTok, and Google to bring their practices into immediate compliance with the DSA.
- Impose fines and, where appropriate, periodic penalty payments in cases of continued non-compliance.
- Where platforms propose commitments to change their practices, ensure that interested third parties are given a meaningful opportunity to submit their views on those commitments.

Consumer groups participating in the action

Consumer groups participating in the evidence-gathering were Асоциация Активни потребители (Bulgaria), Arbeiterkammer (Austria), ASUFIN (Spain) and Federación de Consumidores y Usuarios – CECU (Spain), Consumentenbond (Netherlands), DECO (Portugal), Federacja Konsumentów (Poland), Forbrugerrådet Tænk (Denmark), Qendra Konsumatori shqiptar (Albania), Que Choisir Ensemble (France), Spoločnosť ochrany spotrebiteľov (S.O.S.) (Slovakia), Verbraucherzentrale Bundesverband – vzbv (Germany), Zveza Potrošnikov Slovenije – ZPS (Slovenia) and BEUC (for Belgium).

In addition, the following BEUC members support the action by filing a complaint at national level: ACR Malta (Malta), Asociația Pro Consumatori – APC (Romania), Consumatori Italiani per l'Europa (CIE) (Italy), dTest (Czech Republic), EKPIZO and KEPKA (Greece), Fédération romande des consommateurs (Switzerland), Fogysztóvédelmi Egyesületek Országos Szövetsége – FEOSZ (Hungary), Forbrukerrådet (Norway), Fundacja Konsumentów (Poland), Kypriakos Syndesmos Katanaloton (Cyprus), Neytendasamtökin - NS (Iceland), Organizacija na potrosuvacite na Makedonija – OPM (Macedonia), Sveriges Konsumenter (Sweden), Union Luxembourgeoise des Consommateurs – ULC (Luxembourg), Unija potrosaca Hrvatske (Croatia), and Vartotojų aljansas (Lithuania).

¹ This action supports and further substantiates the Commission's investigation launched into Meta and other VLOPs on similar grounds.

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THE TOXIC MIX: WHEN PAYMENT FRAUDS MEET THE PLATFORM ECONOMY

Financial frauds in digital transactions is a serious threat to consumers. As the economy becomes more interconnected and digitalised, fraud has evolved to include identity theft, payment fraud, or account takeover. In Europe, financial losses suffered by consumers reached **EUR 4.2 billion in 2024, representing a 17% increase** compared to the previous year.² In March 2025, the European Banking Authority (EBA) identified payment fraud as one of the most important issues affecting EU consumers.³ In 2025, a survey on digital payments conducted by consumer groups in 10 European countries revealed that 22% of adults and 18% of teens had been victims of frauds or security breaches in the last 5 years.⁴ In 2025, the Danish consumer organisation **Forbrugerrådet Tænk** highlighted that one in three Danish citizens had been victim of digital frauds and three in four had been exposed to fraud attempts.⁵ In 2025, the Austrian **Chamber of Labour (AK)** stressed that one in five respondents had experienced serious issues with online payment transfers, including misdirected transfers, fraud and phishing. Three out of four respondents **lost up to 600 EUR**, and 22% did not receive anything back.⁶ In France, **Que Choisir Ensemble** has similarly repeatedly raised concerns about payment frauds and the lack of effective redress.⁷

In parallel, online advertising has become a major

driver for payment frauds. It enables fraudsters to reach millions of consumers across Europe and beyond. A study conducted by the Austrian E-Commerce Trust Mark found that **54.7%** of respondents reported seeing fraudulent or suspicious ads on platforms such as Facebook, Instagram, and TikTok.⁸ **BEUC members have repeatedly highlighted this alarming trend.** In 2022, in the United Kingdom, **Which?** collected 6,300 investment ads from Meta's ad library and manually analysed 1,064 of these ads against a set of risk flags. Which? found that 484 ads promoted investment products or services, and 89 of them triggered three or more serious risk flags.⁹ Which? also researched why and how consumers are tricked into sending money to a fraudster (through so-called Authorised Push Payment (APP) scams). They found that scammers often create a sense of urgency and trust to manipulate their victims.¹⁰ In 2024, in the Netherlands, **Consumentenbond** filed a complaint with the European Commission against fraudulent fake online shops not delivering products after payments. Consumentenbond found that many of these fake online shops advertise their products on Facebook and Instagram.¹¹ In 2025, in Germany, **vzbv** highlighted that out of 60 reported ads on 13 different platforms (including Google, Facebook and Instagram), only 28 of them were removed, and 25 were not removed.¹² vzbv also investigated 650 fake-shop domains. 50% of these fraudulent websites were found

-
- 2 European Banking Authority, '2025 report on payment fraud' (December 2025), www.eba.europa.eu/sites/default/files/2025-12/1709846a-84d9-47cf-86a0-b155efb34d66/EBA%20and%20ECB%20Report%20on%20Payment%20Fraud.pdf, p 10 (accessed 13 April 2026).
 - 3 European Banking Authority, 'EBA Consumer Trends Report 2024/25', www.eba.europa.eu/sites/default/files/2025-03/514b651f-091b-42d3-b738-1fae79264044/Consumer%20Trends%20Report%202024-2025.pdf, p. 6 (accessed 13 April 2026).
 - 4 BEUC, 'FREE, EASY AND SECURE', www.beuc.eu/sites/default/files/publications/BEUC-X-2025-085_What_consumers_expect_from_the_digital_euro-copy.pdf, p 3 (accessed 14 April 2026).
 - 5 Forbrugerrådet Tænk, 'Hver tredje borger er blevet digitalt svindlet' (1 May 2025), <https://taenk.dk/presse/hver-tredje-borger-er-blevet-digitalt-svindlet> (accessed 14 April 2026).
 - 6 The Chamber of Labour, 'Digital zahlen: Bequem, einfach, riskant' (8 July 2025), www.arbeiterkammer.at/beratung/konsument/Geld/Bargeldloszahlen/Digital-zahlen-Bequem-einfach-riskant-.html (accessed 14 April 2026).
 - 7 Que Choisir Ensemble, 'L'UFC-Que Choisir dépose plainte contre 12 banques', www.quechoisir.org/action-ufc-que-choisir-refus-de-remboursement-des-fraudes-bancaires-l-ufc-que-choisir-depose-plainte-contre-12-banques-n101896/ (accessed 17 April 2026) (In 2022, the organisation filed complaints against 12 banks after analysing 4,300 reports of unjustified refusals to reimburse fraud victims).
 - 8 Österreichisches E-Commerce-Gütezeichen, 'Von betrügerischer Online-Werbung umgeben: Zumindest jede zweite Person in Österreich betroffen', www.guetezeichen.at/blog-detail/betruegerische-online-werbung-jeder-zweite-betroffen/ (accessed 31 March 2026).
 - 9 Which? 'Toward a future without fraud' (December 2022), www.which.co.uk/policy-and-insight/article/policy-and-insightarticle toward-a-future-without-fraud-asOAS4p6cVLo (accessed 13 April 2026).
 - 10 Which? 'The psychology of scams' (December 2022), <https://media.product.which.co.uk/prod/files/file/gm-c66f3d70-3928-4dee-bb8b-481405be2b5e-the-psychoology-of-scams-understanding-why-consumers-fall-for-app-scams.pdf> (accessed 13 April 2026).
 - 11 Consumentenbond, 'Nepshops: wel betaald, maar niets ontvangen' (24 September 2024), www.consumentenbond.nl/acties-claims/nieuws/2024/nepshops-betaald-maar-niets-ontvangen (14 April 2026). After examining 101 fake shops which had already been flagged by the Police, Consumentenbond found that 71% of the fake shops advertise on Facebook and Instagram (Meta). The ads had been viewed over 40 million times. Consumentenbond conducted a follow-up investigation in the same year, showing that 16 out of 30 fake shops had fraudulent ads on the Meta network.
 - 12 vzbv, 'Trusted flagger: Reports of illegal content are not being adequately processed by platforms' (06 March 2026), www.vzbv.de/en/trusted-flagger-reports-illegal-content-are-not-being-adequately-processed-platforms-0

to run ads on Google or Meta generating millions of impressions, with the top five alone accounting for at least 134 million ad impressions on Google platforms.¹³

Beyond the BEUC network, Europol has identified investment fraud as one of the most common and rapidly growing forms of online fraud. Europol has noted that criminal networks heavily rely on online advertisements on social media platforms and sponsored results on search engines to approach and deceive victims.¹⁴ In April 2026, **Fundación Maldita** identified 67,000 fraudulent ads published by 170 Facebook accounts holding the blue verification badge. While the blue checkmark on a Facebook profile is intended to signal authenticity, Fundación Maldita found that it can also strengthen credibility and visibility of scam ads.¹⁵ Similarly, in April 2025, **Reset Tech** investigated over 350,000 ads on Facebook and over 2,000 ads on Google about products advertised with unfounded medical claims. The ads included, among others, direct statements that the advertised

products could cure chronic diseases or manage life-threatening conditions.¹⁶ Given the increased digitalisation of both our economy and consumers' social life,¹⁷ the risk of financial fraud is expected to grow even further, making effective detection and prevention measures essential.

Reports have also revealed how online platforms might benefit from fraudulent ads. In December 2025, **Reuters** obtained confidential material which showed that about 10% of Meta's overall annual revenue (approx. EUR 15 billion) comes from running ads for scams and banned goods. This includes fraudulent e-commerce and investment schemes, loans, gambling, and sale of banned medical products. According to the report, many of the fraudulent ads came from marketers whose behaviour was suspicious enough to be flagged by Meta's internal warning systems. However, Meta seemed hesitant to crack down in ways that could harm its business interests.¹⁸

13 Vzbv, 'Jeder zweite Fakeshop schaltet Werbung auf Google oder Meta' (6 November 2025), <https://www.vzbv.de/pressemitteilungen/jeder-zweite-fakeshop-schaltet-werbung-auf-google-oder-meta> (accessed 21 April 2026).

14 Europol, 'The changing DNA of serious and organised crime' (2025), www.europol.europa.eu/cms/sites/default/files/documents/EU-SOCTA-2025.pdf, p. 43 (accessed 14 April 2026).

15 Fundación Maldita, 'Verified scams: how Meta's Blue Checkmark Legitimized 67,000 Fraudulent Ads' (8 April 2026), <https://fundacionmaldita.es/en/news/politicas-publicas/timos-verificados-como-el-tic-azul-de-meta-legitima-67-mil-anuncios-fraudulentos> (accessed 13 April 2026).

16 Reset Tech, 'Clickbait Cures: Unmasking the Deceptive Health Ad Infrastructure on Meta and Google', www.reset.tech/resources/clickbait-cures/ (accessed 15 April 2026).

17 According to a 2022 Eurobarometer survey, 5% of Europeans use information from social media and influencers to make financial decisions.

18 Reuters, 'Meta is earning a fortune on a deluge of fraudulent ads, documents show' (2 November 2025), www.reuters.com/investigations/meta-is-earning-fortune-deluge-fraudulent-ads-documents-show-2025-11-06/ (accessed 13 April 2026). The article continues that "a small advertiser would have to get flagged for promoting financial fraud at least eight times before Meta blocked it, a 2024 document states".



EVIDENCE-GATHERING

Scope

BEUC, together with 13 consumer groups representing in total 13 countries,¹⁹ conducted a large-scale evidence-gathering between December 2025 and March 2026 to identify, and then monitor, fraudulent financial ads circulating on **Meta, TikTok and Google** (hereafter, all together, **‘the platforms’**). The European Commission designated these platforms as Very Large Online Platforms (VLOPs) under the DSA²⁰ since millions of European consumers use them daily.²¹ The evidence-gathering focused on ads visible in Albania, Austria, Belgium, Bulgaria, Denmark, France, Germany, Poland, Portugal, Slovakia, Slovenia, Spain and The Netherlands.

In addition, the following BEUC members support the action by filing a complaint at national level: ACR Malta (Malta), Asociatia Pro Consumatori – APC (Romania), Consumatori Italiani per l’Europa (CIE) (Italy), dTest (Czech Republic), EKPIZO and KEPKA (Greece), Fédération romande des consommateurs (Switzerland), Fogyasztóvédelmi Egyesületek Országos Szövetsége – FEOSZ (Hungary), Forbrukerrådet (Norway), Fundacja Konsumentów (Poland), Kypriakos Syndesmos Katanaloton (Cyprus), Neytendasamtökin - NS (Iceland), Organizacija na potrosuvacite na Makedonija – OPM (Macedonia), Sveriges Konsumenter (Sweden), Union Luxembourgeoise des Consommateurs – ULC (Luxembourg), Unija potrosaca Hrvatske (Croatia), and Vartotojų aljansas (Lithuania).



19 Асоциация Активни потребители (Bulgaria), Arbeiterkammer (Austria), ASUFIN (Spain) and Federación de Consumidores y Usuarios – CECU (Spain), Consumentenbond (Netherlands), DECO (Portugal), Federacja Konsumentów (Poland), Forbrugerrådet Tænk (Denmark), Qendra Konsumatori shqiptar (Albania), Que Choisir Ensemble (France), Spoločnosť ochrany spotrebiteľov (S.O.S.) (Slovakia), Verbraucherzentrale Bundesverband – vzbv (Germany), Zveza Potrošnikov Slovenije – ZPS (Slovenia) and BEUC (for Belgium).

20 European Commission, ‘Supervision of the designated very large online platforms and search engines under DSA’, <https://digital-strategy.ec.europa.eu/en/policies/list-designated-vlops-and-vloses> (accessed 16 April 2026).

21 In 2025, Meta’s founder disclosed that Meta AI has 1 billion monthly active users and that Instagram has 3 billion monthly active users (here & here). In a recent report, Meta declared that in December 2025, around 3.58 billion different people worldwide used at least one of Meta’s platforms on an average day (i.e. Facebook, Instagram, WhatsApp etc.). The report also states that the ad impressions, i.e. the number of ads users see, increased by 12% when comparing the full year of 2025 to 2024 (here). In September 2025, TikTok announced that more than 200 million people across Europe used TikTok every month (here). In Google’s Monthly Active Recipients under the DSA Report from February 2024, Google Search had almost 806 million average monthly users, and YouTube 925 million average monthly users (here).

Methodology

The methodology followed a two-step process. First, we built a benchmark to assess the lawfulness of financial ads against EU rules and relevant national laws. We focused on ads that we considered likely to be blatantly illegal. Second, we tracked the contentious ads using the platforms' ad repositories and monitored contents displayed on their online interfaces.

Identifying fraudulent ads

We used several **red flags** to identify ads likely to be fraudulent, namely:



Does the ad refer to a financial services provider listed in the databases of the European Supervisory Authorities?

The European Supervisory Authorities (EBA, EIOPA and ESMA) provide online databases with public information about companies proposing financial services and products in the EU. When a company promoting financial services in the EU is not registered, it means that the provider is **not authorised** to conduct this activity.

Financial supervisors, both at the European and national level, warn against such credit offers on social media which are *de facto* fraud. Consumers are asked to pay certain fees (e.g. credit insurance) upfront to access the credit. Once all the upfront fees are paid, the lender disappears. As stated by the supervisory authorities, **unregulated credit offering on social media is likely to be fraudulent** in many cases. Where such offers do not fall into the category of fraud, they are likely to be illegal under consumer credit law due to high credit costs (see below).

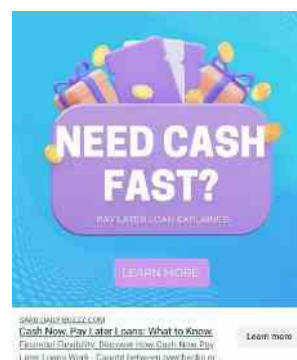


Consumer groups reported this ad to Google on 28 January 2026 as this provider is not registered in the EBA Register. Google replied on 19 February 2026 (22 days later) requesting the relevant URL. We received an automatic reply after indicating the URL.



Is the ad likely to breach EU Directive 2005/29 prohibiting unfair commercial practices (UCPD)?

Under Art. 5 UCPD, a practice is unfair if it goes against the requirements of professional diligence and materially distorts (or is likely to distort) the economic behaviour of the average consumer about the product. *Professional diligence* is defined as the standard of special skill and care that traders may reasonably be expected to exercise towards consumers, in line with honest market practices and/or the general principle of good faith in the trader's field of activity. Additionally, Art. 6(1) UCPD prohibits misleading actions, including practices that contain false information or are (likely) to deceive the average consumer, even where the information is factually correct, especially regarding the product's main characteristics, such as its availability, benefits or risks. Ads using wording like "need cash fast?" or "fast money without verification" are likely to be unfair commercial practices under the UCPD as **they convey an impression of quick gains and high returns while downplaying risks.**



Consumer groups reported this ad to Google on 28 January 2026 as this provider is not registered in the EBA Register. Google replied on 19 February 2026 (22 days later) requesting the relevant URL. We received an automatic reply after indicating the URL.

In 2023, in a complaint entitled “Hype or Harm? The great social media crypto con”, consumer groups alerted the European Commission and the Consumer Protection Cooperation (CPC) Network about social media companies allowing misleading advertisements for crypto assets to multiply on their platforms, both through advertisements and via influencers.²²



Is the ad likely to breach EU Directive 2008/48/EC, to be repealed by EU Directive 2023/2225 on credit agreements for consumers (CDD1 and CCD2)?

While CCD1 does not explicitly regulate payday loans (i.e., loans with a very high interest or upfront costs to access credit), the transposition into national law of the first Consumer Credit Directive (2008/48/EC) often led to the introduction of cost caps for consumer credits which has rendered payday loans illegal in many EU Member States.²³ CCD2, which had to be transposed into national law by November 2025 and will apply as from November 2026, obliges Member States to ensure that consumers cannot be charged with excessively high borrowing rates, annual percentage rates of charge or total costs of credit.

Art. 7 CCD2 requires that any advertising and marketing communications concerning credit agreements (such as loans) are **fair, clear and not misleading**. Wording in such advertising and marketing communications that may create **false expectations** for a consumer regarding the availability, the cost of credit or the total amount payable by the consumer are prohibited. This means that ads using phrases such as “fast loan”, “payday loan” or “loan approved within 3 minutes” are likely to be unfair and misleading under CCD2.

Art. 8 CCD2 foresees that each advertising must include a prominent warning saying “Caution! Borrowing money costs money.” In addition, Art. 8 CCD2 provides that Member States should prohibit advertising that (1) suggests that credit may improve consumers’ financial situation, (2) specifies that outstanding credit agreements or registered credit in databases have little or no influence on the assessment of a credit application, and (3) falsely suggests that credit leads to an increase in financial resources, constitutes a substitute for savings or can raise a consumer’s living standards. In addition, Member States can prohibit advertising for credit products which (among others) highlights the ease or speed with which credit can be obtained.²⁴

Consumer groups reported this ad to Meta on 11 February as it promoted a fast loan (“prêt rapide”), likely to breach CCD. Meta replied two days later saying that the ad had already been removed by the advertiser.

²² BEUC, ‘Hype or Harm? The great social media crypto con’ (8 June 2023), www.beuc.eu/enforcement/hype-or-harm-great-social-media-crypto-con (accessed 13 April 2026).

²³ European Commission (2021): Commission staff working document impact assessment report accompanying the proposal for a directive of the European Parliament and of the Council on consumer credits: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52021SC0170>, p. 13.

²⁴ This is for instance the case in France (www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000032226188).



Is the ad likely to breach EU Regulation 2023/1114 on Markets in Crypto-Assets (MiCA)?

Art. 7 MiCA states that any marketing communications about offering a crypto-asset to the public, other than an asset-referenced token or e-money token, or about admitting such a crypto-asset to trading, should be clearly identifiable, as well as fair, clear and not misleading. Every trader of crypto assets must publish a white paper with key information about the crypto asset which needs to clearly state that the crypto-asset may lose its value in part or in full (Art. 6 MiCA). Additionally, the information in the marketing communications needs to be fair, clear, not misleading and consistent with the information in the crypto-asset white paper (Art. 7), hence any type of ads targeting crypto-assets which are promoted as “safe” and “secure” are likely to violate MiCA.

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officialcryptoloans.com
www.officialcryptoloans.com/

get crypto loans - Explore Loans Invest Now

CryptoLend Provides a Secure and Transparent Platform for Loans and Investments Borrow against BTC, ETH, and more, or invest in our high-yield platform.

Consumer groups reported this ad to Google 14 January, as Google prohibits the advertisement of crypto loans, and because the ad may violate MiCA, as it is promoted as a “secure and transparent platform”. Google ignored the report.

Locating contentious ads

Via ads repositories

Ads repositories are digital libraries archiving ads displayed on platforms. Under Art. 39 DSA, Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) must ensure public access to their repositories to facilitate the supervision of illegal ads, manipulative practices and disinformation.

Platform	Link to the ad repository
Meta	www.facebook.com/ads/library/
TikTok	https://library.tiktok.com/ads/
Google	https://adstransparency.google.com

Ads repositories are structured differently for each platform and have their own search tools. On Meta and TikTok, the search for ads can be carried out via key words. On Google, one must search for advertisers or URLs of websites to find ads. Most of the contentious ads that consumer groups reported were identified through the platforms’ ad repositories. A smaller number of fraudulent contents were also identified directly on the platforms’ interfaces.²⁵

BEUC and its members analysed how the platforms dealt with fraudulent ads. First, we found ads related to financial services and products. When possible, we used filters or keyword searches like ‘investment’, ‘cryptocurrency’, ‘cash’, ‘revenue’, ‘loan’, ‘credit’, ‘payment’. Second, we used the platforms’ notice-and-action mechanisms to report the ads. We always indicated the reasons for reporting the contents. Third, we monitored platforms’ responses (time, confirmation of receipt, and possible decision to remove the flagged ads from their interfaces). Finally, where complaints were filed using platforms’ internal complaint-handling mechanisms, we also monitored the responses received as well as their outcomes.

Consumer groups reported ads either as:

- Individual users; *and/or*
- Consumer organisations; *and/or*
- Trusted flaggers. Trusted flaggers are entities designated under the DSA to identify and report illegal contents. Platforms are expected to handle request from trusted flaggers without undue delay.²⁶

²⁵ Consumer groups found examples of ads on TikTok that were not included in the ad repository. This can be problematic because these ads bypass requirements under the DSA on ad transparency.

²⁶ European Commission, ‘Trusted flaggers under the Digital Services Act (DSA)’ (31 March 2026), <https://digital-strategy.ec.europa.eu/en/policies/trusted-flaggers-under-dsa> (accessed 16 April 2026).

In doing so, we were able to monitor possible differences in responses when ads are reported from different sources. Finally, we also reviewed the platforms' internal advertising policies and procedures

to understand how to effectively flag fraudulent content, and to better understand the way platforms present their own responsibilities when it comes to fighting scams.

Limitations

We acknowledge several limitations to the evidence-gathering:

- First, the search was constrained by the functionalities available in each ad repository, which differ importantly between platforms.²⁷
- Second, we focused on ads that, according to our assessment, were blatantly against the law. We tried to avoid ads likely to fall into grey categories.²⁸
- Third, we selected specific keywords to detect financial ads. This approach may have resulted in some relevant fraudulent ads being overlooked.
- Fourth, we acknowledge that the number of ads collected for Google is lower than for the other two platforms. This is mainly due to limited resources during the evidence-gathering. This smaller volume is not an indication that the problems on Google's platforms are less severe. For instance, extensive evidence is not required to establish that Google's ad repository is severely flawed. Despite Google's repeated claims, we found several examples that we believe can represent the platform's lack of compliance with DSA requirements. This is why, despite the lower number of ads, we decided to include Google into the scope of the complaint. The European Commission and the competent authorities may fill in this gap by using their own investigative powers.
- Fifth, while we used the platforms' internal complaint-handling systems, we did not use the second step: the independent out-of-court dispute resolution mechanism as foreseen in Art. 21 DSA. While this may play an important role, this goes beyond the scope of this complaint and requires a separate study.²⁹

Results

The figures presented below provide a snapshot of reported ads and contents.³⁰ Additional examples of scams flagged by consumer groups can be found in the accompanying **Annex**.

In a nutshell, consumer groups found that:

- Meta rejected nearly 43% of the submitted ads.
- TikTok only removed 21% of the submitted ads. In 37% of the cases, TikTok claimed that the ad was removed before they could review it.
- Google removed 60% of the submitted ads.

	Total number of notices submitted against fraudulent ads	Total number of ads taken down by the platform after notices	Total number of notices rejected by the platform as not considered fraudulent	Total number of ads ignored by the platform	Total number of ads removed before review
Meta	503	146	216	90	51
TikTok	360	79	74	73	134
Google ³¹	30	18	7	5	0
Total	893	243	297	168	185

27 For example, on Google, the search functionality is limited to name-based searches and does not support additional criteria (e.g. ads content).

28 In a limited number of cases, ads could be subject to different legal interpretations, and the infringements were potentially less clear cut.

29 The European Commission recently commissioned a study aimed to assess out-of-court dispute settlement bodies under Article 21 of the DSA. European Commission, 'Study to assess Out-of-Court Dispute Settlement (ODS) bodies under Article 21 of the Regulation (EU) 2022/2065 (Digital Services Act)', <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/tender-details/3d85ae8d-9434-4f5f-a475-b3670136fb12-EXA?isExActMatch=true&status=31094503&order=DESC&pageNumber=1&pageSize=10&sortBy=startDate> (accessed 21 April 2026).

30 The numbers indicated in this table should be seen as indicative.

31 For an explanation of the lower number found on Google, please refer to the previous section.



LEGAL ASSESSMENT

Consumer groups take the view that Meta, TikTok and Google acting as VLOPs fail to address the circulation of financial fraudulent ads on their online interfaces and infringe Art. 16, 20, 23, 24, 25, 34, 35 and 39 DSA. In several cases, consumer groups found alarming discrepancies between what platforms claim to do and the reality of what is happening on their interfaces.

We also noticed substantial differences in treatments depending on whether reports were submitted as trusted flaggers, individual users or consumer organisations. Reports submitted by trusted flaggers appeared to be handled more diligently. For example, in the case of Meta, almost all ads reported by trusted flaggers were taken down. Differences were also noticeable in the quality of the reporting system and the overall user experience. TikTok acknowledged receipts of complaint and usually notified trusted flaggers about its decisions. However, we did not observe the same treatment for reports submitted by individuals and consumer organisations.

Failure to identify and mitigate systemic risks

What the law says

Under Art. 34 DSA, VLOPs must control systemic risks arising out from their services. In accordance with Art. 3(h) and 34(1)(a) DSA, those risks include the dissemination of any information that is not compliant with the EU's or a Member State's national law, irrespective of the precise subject matter or nature of that law. Article 34(1)(b) DSA also considers systemic risks any actual or possible harm on fundamental rights. This includes the right to a high-level of consumer protection as set out in the EU Charter of Fundamental Rights. The DSA requires platforms to identify those risks and to adopt effective mitigation measures (Art.35). Independent auditors must assess whether such measures are effective (Art. 37 DSA).

What the platforms say they do

Meta

According to its internal policies, Meta's overall process for content enforcement on Facebook and Instagram can be summarized as follows: *"remove, reduce and inform"*.³² Meta argues it removes contents violating its Community Standards 'as soon as [they] become aware of it'.³³ Meta's guidelines provide examples of unacceptable practices such as **loans with guarantee** or **near-guarantee of approval**, investment options where returns are guaranteed or **risk-free**, or **"get-rich-quick"** opportunities. In March 2026, Meta stressed again its commitment to fight frauds and announced the launch of new tools on Facebook, Messenger, and WhatsApp to monitor scams.³⁴

TikTok

TikTok claims to remove contents or accounts violating its internal rules before they are even shared. This

32 Meta Transparency Center, 'Taking Action', <https://transparency.meta.com/enforcement/taking-action/> (accessed 17 April 2026).

33 Meta Transparency Center, 'Community Standards', <https://transparency.meta.com/policies/community-standards/> (accessed 17 April 2026).

34 Meta, 'Fighting Scammers and Protecting People With New Technology and Partnerships', <https://about.fb.com/news/2026/03/fighting-scammers-protecting-people-with-new-technology-and-partnerships/> (accessed 17 April 2026). "In 2025, we removed over 159 million scam ads for violating our policies, and we also took down 10.9 million accounts on Facebook and Instagram associated with criminal scam centers."

includes financial scams, such as fake investment offers or ‘get-rich-quick’ schemes.³⁵ The platform says it reviews all uploaded contents through an automated process. In case of potential issues, a human content moderation team may intervene. If advertisers repeatedly violate the rules, TikTok first strikes their account with a warning, before deleting the account permanently.³⁶

Google

Google states that where the company ‘reasonably believe[s]’ that contents breach its policies or violate applicable laws, the platform may decide to take down some or all that content.³⁷ Google claims to either refuse ads or suspend advertisers when necessary, and advertisers can receive maximum 3 strikes with following penalties (putting the account on hold or suspending it).³⁸

What consumer groups have found

Meta

Meta’s review of fraudulent ads is insufficient. Regardless of what the platform claims, illegal contents remain widespread on its services. For example, in theory, Meta prohibits ads promoting payday loans.³⁹ However, consumer groups found **many examples of such ads which were in clear breach of EU law** and the platform’s terms and guidelines. The suspicious wording is plainly visible in the ad text, which raises questions as to why the platform’s sophisticated detection systems were **unable to flag such content.**

The situation does not change if users proactively report the ads. Meta only removed 146 ads out of the 503 submitted by consumer groups across Europe. 51 ads were already removed by the advertiser before Meta reviewed them. More than 300 fraudulent ads remain active on the platform.⁴⁰



Screenshot taken on 27 February 2026.

This situation seems to be well reflected in Meta’s compliance documents. In its *Systemic Risk Assessment Report* of September 2024, Meta did neither refer to “consumer”, “scam” nor “fraud” a single time. The same is to say for the platform’s *Independent Audit Report*, which also does not consider the problem of online frauds or propose any corrective measures.⁴¹

As highlighted before, recent reports revealed how Meta might profit from online scams circulating on its platform.⁴² According to Meta’s internal documents (also dated late 2024), the company planned to earn almost **10% of its overall annual revenue** from running advertising based on scams and banned goods.

35 TikTok, ‘Regulated Goods, Services, and Commercial Activities’, <https://www.tiktok.com/safety/en-GB/policies-and-engagement/regulated-commercial-activities?cgversion=2025H2update> (accessed 16 April 2026).

36 TikTok, ‘Enforcement’, <https://www.tiktok.com/safety/en-GB/policies-and-engagement/enforcement> (accessed 16 April 2026).

37 Google, ‘Terms of Service’, <https://policies.google.com/terms?hl=en-US> (accessed 16 April 2026). Country version: Belgium. Google also has, in its Ads Transparency Center, specific terms in addition to the general ones: ‘Ads Transparency Center Additional Terms of Service’, <https://adstransparency.google.com/terms?hl=en®ion=BE> (accessed 16 April 2026).

38 Google, ‘About enforcement procedures for repeat violations’, <https://support.google.com/adspolicy/answer/10922738?hl=en-GB&sjid=4046730006865326720-EU> (accessed 16 April 2026).

39 Meta Transparency Center, ‘Financial and Insurance Products and Services’, <https://transparency.meta.com/policies/ad-standards/restricted-goods-services/financial-services/>

40 Meta rejected 216 ads and ignored 90 ads, in total 306 ads.

41 Meta, ‘Regulatory and Other Transparency Reports’, <https://transparency.meta.com/reports/regulatory-transparency-reports/> (accessed 17 April 2026). Please see: “EU Digital Services Act: Audit Implementation Reports”, p7.

42 Reuters, ‘Meta tolerates rampant ad fraud from China to safeguard billions in revenue’. www.reuters.com/investigations/meta-tolerates-rampant-ad-fraud-china-safeguard-billions-revenue-2025-12-15/ (accessed 17 April 2026).

How could Meta be so precise about scams in its internal documents, but so oblivious about this issue in its public statements?

TikTok

Illegal ads are widespread on TikTok’s repository. TikTok prohibits ads promoting payday loans, but consumer groups found many ads on this topic in TikTok’s ad repository.⁴³ Our evidence showed that **around 40%** of the submitted notices were either rejected or simply ignored.⁴⁴

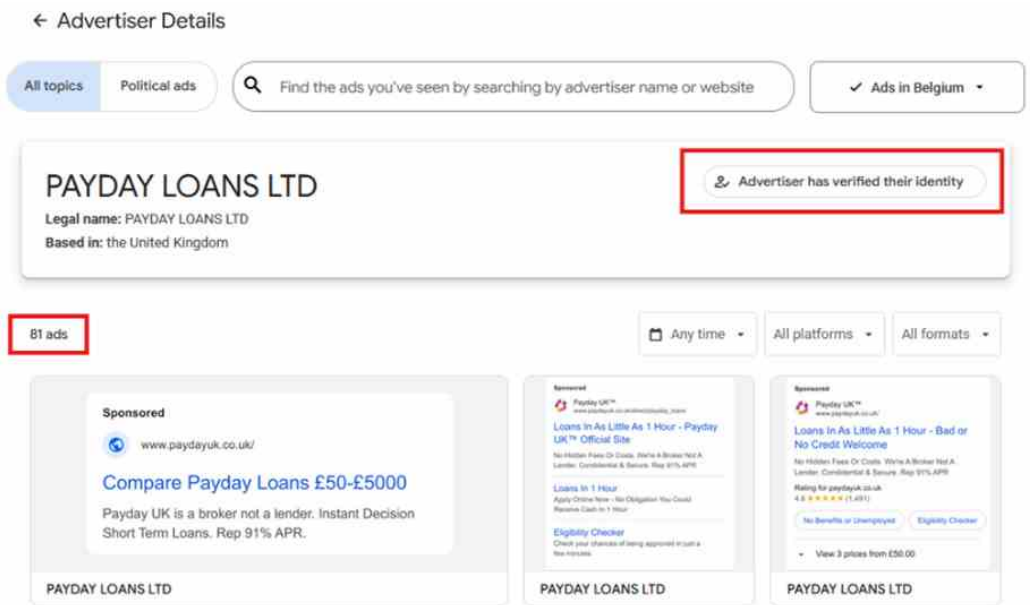
In its 2025 DSA Risk Assessment Report, TikTok did not consider the risk of fraudulent ads for a high level of consumer protection, and its DSA Audit Implementation Report did not address the company’s compliance with Art. 35(1) DSA to adopt effective mitigation measures.⁴⁵



Screenshot taken on 12 February 2026.

Google

Google’s efforts to address systemic risks appear limited. Consumer groups found 30 examples of fraudulent ads breaching EU rules and/or Google’s advertising policies. Google has a ‘verification programme’ in their ad library to show whether an advertiser has verified its identity.⁴⁶ However, both non-verified and verified advertisers can still publish and disseminate fraudulent ads. For example, consumer groups reported 4 ads against an advertiser called “PAYDAY LOANS LTD”. 3 of them were taken down, and 1 was ignored. The account appears still active today with 81 search results in Google’s ad library.



Screenshot taken on 14 April 2026.

43 TikTok Business Help Center, ‘Advertising policies – Financial Services’ (February 2026), <https://ads.tiktok.com/help/article/tiktok-ads-policy-financial-services#>. Screenshot taken 12 February 2026 in TikTok’s ad library (ad visible in Belgium).

44 Consumer groups reported 360 ads on TikTok. 74 ads were rejected, and 73 ads were ignored (147 ads in total).

45 www.tiktok.com/safety/en/transparency/dsa-transparency: DSA Risk Assessment Report - The only moment the assessment considers this risk is to say that TikTok implements “(v) controls which mitigate the risk that TikTok Shop can be used to market or sell content or sell content in a manner that undermines Fundamental Rights, in particular consumer protection rights.” (p. 79).

46 <https://support.google.com/adspolicy/answer/9703665?hl=en> (accessed 14 April 2026).

Failure to remove scammers from the platforms

What the law says

As part of the mitigating measures in the fight against illegal content, platforms should remove scammers from their services. Moreover, Art. 23 DSA requires online providers to suspend accounts frequently disseminating illegal contents. Under Article 24(1)(b) DSA, platforms must declare the number of accounts suspended in their transparency reports. In doing so, the DSA intends to verify how effective platforms are in fighting illegal contents and complying with the law.

What the platforms say they do

Meta

Meta claims to use automated and, in some cases, manual review to remove or block fraudsters. As Meta stresses, 'we also monitor and investigate advertiser behaviour, and may restrict advertiser accounts'. In Q3 2025, Meta declared it had removed nearly 698 million fake accounts from Facebook.⁴⁷

TikTok

TikTok claims to empower its community to stay vigilant against common industry-wide scams. According to its Community Guidelines, TikTok does not allow attempts to defraud or scam users. Yet to our knowledge, TikTok does not provide a clear methodology for blocking or removing scammers.⁴⁸

Google

Google says it relies on a combination of automated processes and human intervention to ensure that ads comply with its policies. Google stresses that it acts when contents violate its policies and can, for instance, block contentious ads and suspend accounts for repeated or egregious violations.⁴⁹

What consumer groups have found

Meta

The evidence shows that certain advertisers frequently upload scams. However, the likelihood that these accounts are blocked remains **low**. For example, consumer groups raised concerns about an advertiser named "Fast Loan" and reported four ads likely to breach the UCPD and the EU rules on credit agreements for consumers. Out of those four notifications, Meta removed one ad. Two were removed by the advertiser, and one report was ignored. Checking the ads a couple of weeks later, three out of those four ads had been removed by Meta for violating its advertising policies. **Yet the advertiser's account is still active on Facebook.** In its transparency reports, Meta declared zero suspensions against repeat offenders.⁵⁰



Screenshot taken on 3 February 2026 in Meta's ad library (ad visible in Belgium). Example of one of the four ads reported. Translation into English: "I'm heavily in debt and the bank has refused to lend me any money. How can I get a loan?"

47 Meta, 'Introduction to the Advertising Standards', <https://transparency.meta.com/en-gb/policies/ad-standards> (accessed 16 April 2026).

48 TikTok, 'Community Guidelines', www.tiktok.com/support/faq_detail?category=web_privacy_user_safety&id=7543604781873371654&lang=en-GB (accessed 16 April 2026).

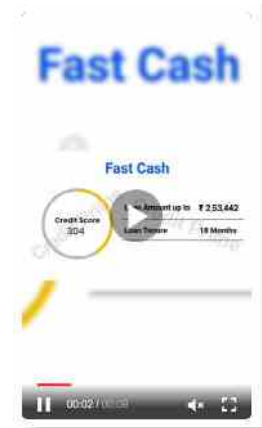
49 Google, 'Google Ads policies', <https://support.google.com/adspolicy/answer/6008942?hl=en> (accessed 16 April 2026).

50 Meta, 'Regulatory and Other Transparency Reports', <https://transparency.meta.com/reports/regulatory-transparency-reports/> (accessed 15 April 2026).

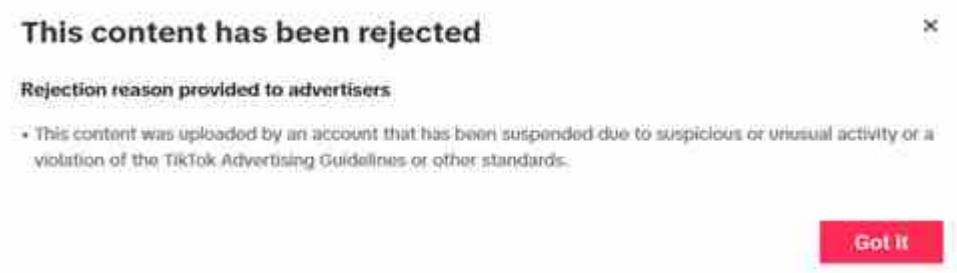
TikTok

Several advertisers frequently upload scams on TikTok and the likelihood that their accounts are suspended or removed is **low**.

For example, consumer groups reported nine ads published by an advertiser named “TRIPSOFT LIMITED”, which we believe were in breach of EU rules on credit agreements for consumers because they advertised “fast cash”. Out of those nine ads from TRIPSOFT LIMITED, only **one was removed** for violating TikTok’s advertising policies. After TikTok’s decision, the ad was not visible in TikTok’s ad library anymore due to being “*uploaded by an account that has been suspended due to suspicious or unusual activity.*” TikTok never considered the remaining eight ads.



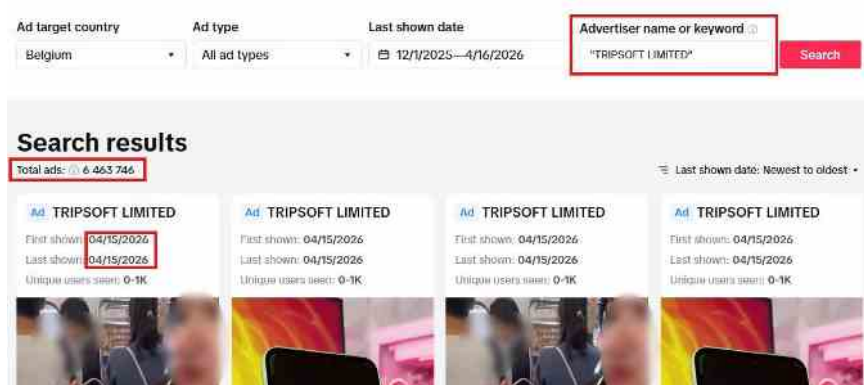
Screenshot taken on 24 February 2026.



Screenshot taken on 13 April 2026 in TikTok’s ad library (https://library.tiktok.com/ads/detail/?ad_id=1838049170510977).

Consumer groups interpreted the message above as TRIPSOFT LIMITED’s account on TikTok being fully suspended. A rather predictable conclusion, given the nature of the advertiser’s ads. However, after searching for the advertiser in the ad library, TRIPSOFT’s account **appears to be still active** to date.

Find ads on TikTok



Screenshot taken on 16 April 2026.

The platform’s communication appears misleading. While users are led to believe that the fraudulent account has been removed following their report, consistent with the cooperative tone advertised by the company, this is yet not reflected in practice, as the account remains active. According to TikTok’s transparency reports, the company has suspended zero repeat offenders to date.⁵¹

⁵¹ TikTok, ‘Digital Services Act Reporting’, www.tiktok.com/safety/en/transparency/dsa-transparency (accessed 17 April 2026).

Google

Consumer groups have observed similar results for Google. Whereas certain advertisers may frequently upload illegal ads, the likelihood that these accounts are ultimately suspended or blocked is low. Out of 20 reported advertisers, **only three advertisers accounts were removed.**⁵²

For example, consumer groups raised concern three times about an advertiser whose name alone should have been enough to alert the platform: “FASTLOANADVANCE LLC.” It comes as no surprise that this advertiser promotes fast loans without credit checks. Instead of acting swiftly and removing a blatantly illegal activity, Google quibbled and asked us to comment on self-explanatory violations. Worryingly, **this advertiser seems to be still active on Google today.**⁵³

In its transparency reports, Google declares that number of suspensions imposed on repeat offenders has been equal to zero to date.⁵⁴



Screenshot taken on 19 February 2026.

Ad repositories as failing tools

What the law says

Art. 39 DSA requires VLOPs to compile a repository listing all the ads shown on their services. The provision sets different requirements. Among others, the ad library must be publicly available, reliable, and provide information about content of the ads, name of the product, subject matter of the advertisement, advertiser, recipients. If the platform removes the ad, the repository must show the reasons behind the removal as required by Art. 17 (3)(a) to (e) DSA.⁵⁵

What the platforms say they do

Meta

Meta presents the Ad Library as a place where users can search for ads running across Meta Products (“You can use it to get information about the ads you see”). The company states that “anyone can explore the ad library, with or without a Facebook account. However, reporting ads and viewing adult content both require that you have an account and are logged in.”⁵⁶

TikTok

TikTok describes its ‘Commercial Content Library’ as a repository of ads running on TikTok, including ads

⁵² This number was calculated on 30 March 2026 and might have changed afterwards.

⁵³ Last checked on 13 April 2026.

⁵⁴ Google, ‘Fostering accountability through transparency’, <https://transparencyreport.google.com/?hl=en> (accessed 20 April 2026).

⁵⁵ The explanation must be “clear and specific”, state the facts and circumstances of the decision, and which specific provision or part of the contract the platform considers to be breached. When the ad is removed, the Statement of Reasons must be uploaded into a public database. These decisions are therefore available and can be studied to verify whether online platforms meet the transparency requirements under Art. 17 DSA.

⁵⁶ Meta, ‘Ad Library’, www.facebook.com/ads/library/ (accessed 15 April 2026).

that are not presently active or paused by the advertisers. The platform stresses that visitors do not need a TikTok account to access, search, or use the library. However, TikTok reserves the right to block the access to the library: “sometimes, we block access from a specific IP if we suspect spam or misuse. Try accessing the platform again in 24 hours.”⁵⁷

Google

Google argues that users should be able to make informed decisions about the ads and advertisers they see on its services. Accordingly, the platform “needs to provide more insight into who our advertisers are, where they are located and what ads they are showing. We include ads from verified advertisers that have appeared on Search, Play, Maps, Shopping and YouTube for 1 year from the date the ad was last shown. We also include ads from unverified advertisers that have been shown in Europe and Turkey.”⁵⁸

What consumer groups have found

Meta

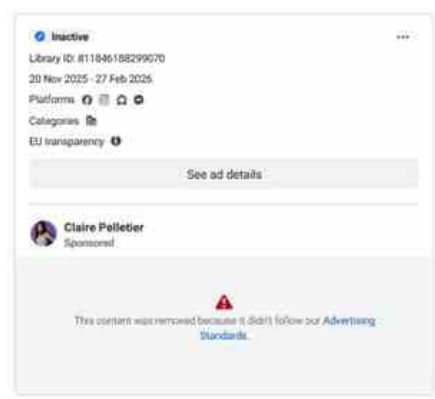
Consumer groups suspect several breaches of Art. 39 DSA. When users want to use Meta’s ad library, they must be logged in (through their Facebook or Instagram account). When non-logged users want to navigate the repository, the webpage first shows a first set of ads. However, when users scroll down, the page does not display any further ads. The library is therefore **not publicly available**. Moreover, the repository crashes frequently. If users make a search and click on the search button, the system always displays an error message (as shown below). The repository is therefore **also not technically reliable**.



Screenshot taken on 2 February 2026.
Translation: “An error has occurred :(”.

Meta’s ad library is **not fully accessible**. If users want to check it, they must perform a search based on key words (“crypto”, “easy loan” or “money”). This is problematic because the system assumes that users know the exact content to search for when trying to detect fraudulent ads. If scammers avoid using trivial words to “tag” their content, these ads will likely not show in the search results. Therefore, overall, the ad library remains **difficult to use and navigate**.

In addition, the library **misses some pieces of mandatory information**. This includes information about the advertisers, their place of establishment and whether the ad is available in a specific country. Where ads are removed, **Meta did not bring clear explanations** although this is required under Art. 39(3) DSA.⁵⁹ In the example below, we reported an ad, which was ultimately removed by Meta. However, in its decision, Meta only referred to a generic violation of its “Advertising Standards”, which is a very comprehensive set of rules. Such a generic reference does not meet the standard of precision required by the DSA for a valid motivation.



Screenshot taken on 16 April 2026 (<https://www.facebook.com/ads/library/?id=811846188299070>).

⁵⁷ TikTok, 'Ad Library', <https://library.tiktok.com/faq> (accessed 15 April 2026).

⁵⁸ Google, 'Ads Transparency Centre', <https://adstransparency.google.com/?region=BE> (accessed 15 April 2026).

⁵⁹ Meta’s Statement of Reasons never mentions which legal provision was breached and does not meet the transparency requirements set by Art. 17 DSA. All the Statement of Reasons are expressed via preformulated wording and lack precision. For example, in this Statement of reasons, the company claims that the content was removed for a violation of paragraph 3.2 of its Terms of Service. However, paragraph 3.2 is an extremely complex clause. A generic reference does not allow the user to understand what specific violation was committed.

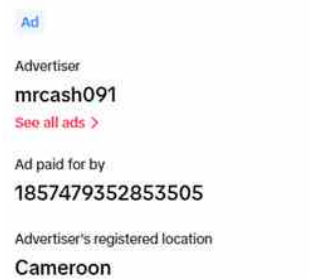
TikTok

TikTok's ad library displays only 12 ads at a time before prompting users to load more results. Loading more results is slow, and again only shows 12 additional ads. This makes it **time-consuming** and difficult to browse through a larger number of advertisements. Consequently, the library is also **not easily accessible**.

The mandatory information under Art. 39(2)(a) DSA about the ads is either **missing or unclear**. In many cases, users must watch a video to understand what the ad is about, and how the repository works. The information about the advertiser also does not appear to be accurate. For example, the advertiser's name is sometimes a simple **string of numbers**. Therefore, it **remains opaque** and fails to comply with Art. 39(2)(b) and (c) DSA.

TikTok may also infringe Art. 39(2)(g) DSA by not providing precise figures for the total number of recipients of the service reached in its ad library. It also often provides imprecise ranges such as '0-1.000' views. This is **unnecessarily vague** and makes it difficult to assess the **actual reach of those ads**.

Moreover, the information in case of removal (Art. 39(3) DSA) is also **incomplete and confusing**. Among other things, the library does not clarify the origin of the removal (user's notice under Art. 16 DSA or own volition investigation). It also omits the facts and the legal reasons behind the removals. The grounds for the decisions always rely on pre-formulated, vague and generic wording.⁶⁰



Screenshot taken on 9 April 2026 in TikTok's ad library.



Screenshot taken on 16 April 2026 (https://library.tiktok.com/ads/detail/?ad_id=1848009777093777). Example of how TikTok describes when an ad has been rejected in a specific Members State (Belgium in this case).

Google

Art. 39(1) DSA requires ad repositories to provide a multicriteria search feature, but Google's ad library only allows searching for an advertiser's name or website, not the content or type of the ad. In practice, this means that if users want to check ads about fast loans, they can only do so if that wording is included in the advertiser's name or website. Obviously, in many cases, fraudsters do not include their illicit activities directly in their name. This means that the search restrictions make the ad library unfit for purpose and in breach of Art. 39 DSA.

⁶⁰ The platform's State of Reasons, which is available in the European Commission's database (but not included in the ad repository, as it should), is just another stripped-down empty explanation lacking any meaningful elements. In case of fraud, the decision's ground is simply "Illegal Content", and the Legal ground relied on "Financial crime". Other than that, nothing else is available. This explanation is insubstantial and violates practically all the requirements set in Art. 17 DSA.

The information about advertisers is also **limited**. The library only shows their name and country, making it difficult to understand who the advertiser is. **All the other elements required by the law are missing**. Lastly, it is also difficult to understand in which Member States the ad is shown or restricted.



Screenshot taken 16 April 2026
(<https://adstransparency.google.com/advertiser/AR01747485269185003521?region=BE>).

Google also appear to breach Art. 39(3) DSA. When an ad is removed, **Google does not provide the mandatory information**, including the reasons for removing the ad.



Can't find ad

An ad with this ID was not found in your region.

Screenshot taken 16 April 2026 (<https://adstransparency.google.com/advertiser/AR03677594815538659329/creative/CRO2636362646974103553?region=BE>).

Flawed 'notice-and-action' mechanisms

What the law says

Art. 16 DSA regulates how users can report illegal contents on the platform through notice-and-action mechanisms. These mechanisms must be easy to access and user-friendly (Art. 16(1) DSA). Once a notice is submitted, online platforms must acknowledge receipt and process the case in a timely, diligent, fair and objective manner. Platforms must decide on every received notice and notify the decision to the interested party. They also need to explain how users can challenge the decision or seek redress.

What the platforms say they do

Meta

Meta emphasizes the added value of users' contribution for detecting and reporting illegal contents to "help improve the integrity and relevance of ads across our technologies."⁶¹ When users report an ad, Meta reviews it by relying on 'automated tools, and in some cases, a manual review'. If the platform detects a violation of its advertising policies, Meta says it will remove the ad.⁶²

⁶¹ Meta, 'Report an ad', www.facebook.com/business/help/162606073801742 (accessed 16 April 2026).

⁶² Meta, 'How can I give feedback about the ads I see on Facebook?', www.facebook.com/help/1440106149571479 (accessed 17 April 2026).

TikTok

In case an ad is reported, TikTok takes a two-step approach. First, the platform assesses the ad against its internal policies. In case of violation, the ad is removed. Second, if there is no violation of its policies, TikTok analyses the report to assess whether it goes against the law. If there is enough information and the content is indeed found to be illegal, TikTok usually blocks it in the country where it is illegal – or sometimes across the EEA region – or removes it entirely from its interface.⁶³

Google

Users can report ads by submitting a form to Google. On its support page, Google clarifies that its content and product policies apply globally, but the platform also considers local laws. For that reason, Google warns users that content is typically only removed (or access is restricted) in the country or region where the content is found to be illegal.⁶⁴

What consumer groups have found

Meta

Meta shifts the obligation to demonstrate the ad’s illegality onto users, by requiring them to identify which law they think the ad breaches, to provide evidence, documentation and even case law. However, under Art. 16, 34 and 35 DSA, the platform must help users report illegal contents. Once users submit “sufficiently precise and adequately substantiated notices,” it is on the platform to verify whether the content is illegal.

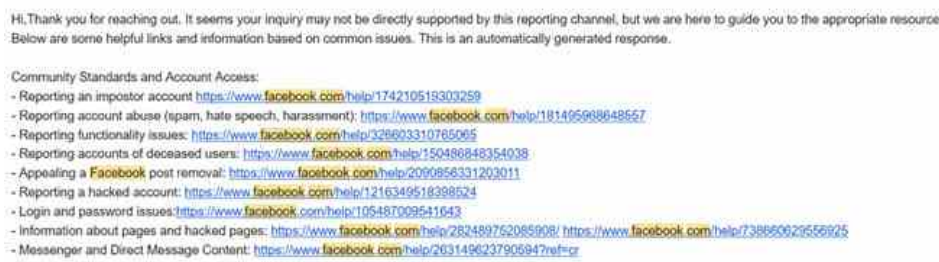
Meta’s reporting mechanism requires users to provide links to the content they want to report. However, our analysis has also revealed that if users provide the URL, **Meta always rejects the report**. Curiously, Meta only responds when users provide the ID of the ad instead of the URL. In other words, **the only way to obtain an answer from Meta is to do the opposite of what the platform requires**, hence giving users misleading information.



Screenshot taken on 8 April 2026. This is one section of the Meta’s reporting mechanism. It says, “please provide links (URLs)...”.

On several occasions, Meta ignored our reports and never replied. When the platform responded, it was always through automatic replies, which can be grouped into two broad categories.

First, Meta starts ‘conversations’ with users. On some occasions, the platform requests additional information even though the notice was sufficiently precise. **To our knowledge, if users reply, Meta stays silent and does not progress the case**. By doing so, the platform tries to bypass its DSA obligation to decide **on each report** (Art. 16 DSA).

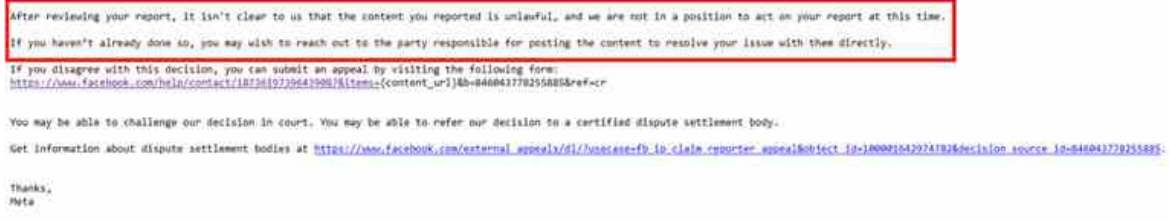


Screenshot taken on 20 February 2026.

63 TikTok, ‘Reporting Illegal Content’, www.tiktok.com/legal/page/global/reporting-illegal-content/en (accessed 15 April 2026).

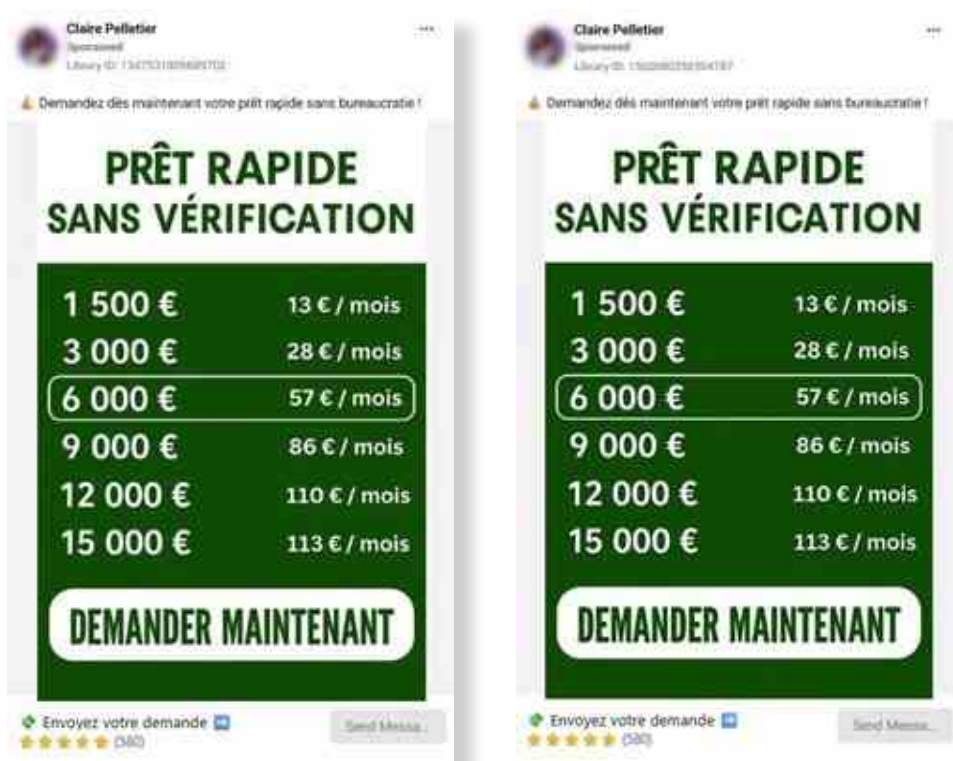
64 Google, ‘This tool will guide you through the process of reporting content that you believe warrants removal from Google’s services based on applicable laws’, <https://support.google.com/legal/answer/1117341?hl=en> (accessed 15 April 2026).

Second, when Meta adopted a decision on whether to take down a fraudulent ad, the responses obtained were vague and the rationale behind was never clearly explained. The platform even suggested to “reach out to the party responsible for posting the content to resolve your issue with them directly.” This breaches Art. 16 DSA as it lacks a motivation for the decision. Without this, it may be difficult for users to appeal the decision.



Screenshot taken on 13 February 2026.

In our investigation we also observed that **similar reports can lead to inconsistent outcomes**. For example, we submitted two separate reports to Meta about two ads promising “fast loans without verification”, using identical language and with different library ID numbers (see below). Meta rejected the removal request for the left ad and yet claimed that the removal request for the right ad was unclear about what law or legal right had been infringed. This discrepancy in the assessment is surprising as we used the exact same legal argumentation to substantiate both reports. In conclusion, the platform does not process removal requests in a “diligent, non-arbitrary and objective manner” (Art. 16(6) DSA).



Screenshots taken on 24 February 2026.

TikTok

When users want to report ads on TikTok, the platform requires them to justify the reports **using a maximum of 200 characters**.⁶⁵ This limit tends to be **arbitrary** and limits users' right to present their views.

When ads were reported, TikTok did **not confirm receipt**. In fact, on several occasions, **TikTok ignored our reports**. When the platform did react, it usually responded that the ad had been removed by the advertisers before its review. Out of 360 reported ads, TikTok replied 134 times claiming the ad was removed before review,

Similarly to Meta, when TikTok formally rejected a removal request, it never motivated its decisions, hence breaching Art. 16 DSA.

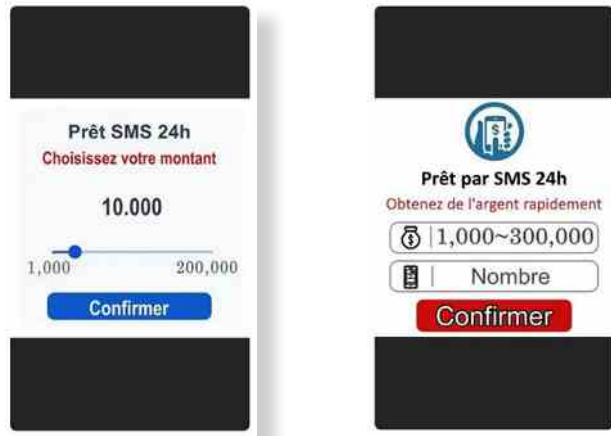
The platform generally claimed that there was insufficient evidence to progress the case. This is hardly true. The ads we reported were clearly fraudulent. In these cases, the evidence is how the ad appears and the language it uses. It also makes it more difficult for users to appeal the decision afterwards.

As we observed with Meta, TikTok also dealt with similar ads in an **inconsistent manner**. For example, we submitted separate reports for the two ads below. Both were similar in the message they conveyed. Only the ad on the right was removed, whereas the left one remained online. Even though we used the same legal argumentation for both ads, TikTok claimed the report for the left ad was not supported by sufficient evidence. This shows that the platform does not process removal requests in a diligent, non-arbitrary and objective manner as required by Art. 16(6) DSA.



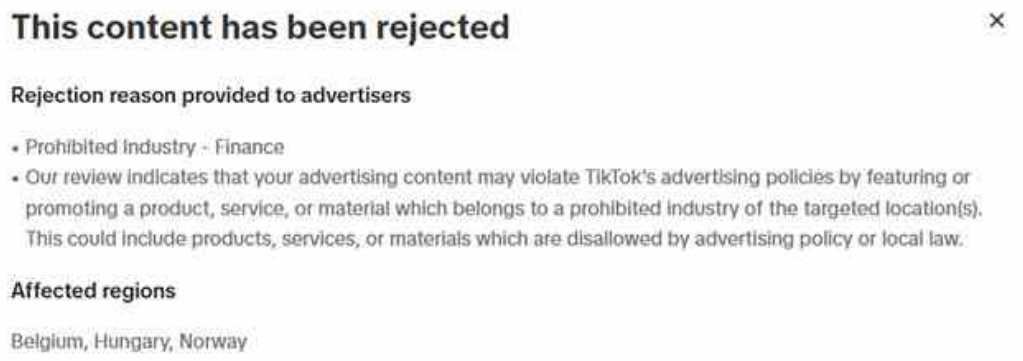
Screenshot taken on 31 March 2026.

⁶⁵ Screenshot taken 24 February 2026.



Screenshots taken on 17 February 2026

TikTok also appeared to apply different practices across Member States. For example, it removed ads in one country while still leaving them active in other Member States. For example, as the screenshot below shows, the contentious ad was removed in the “affected regions” only (namely Belgium, Hungary and Norway).



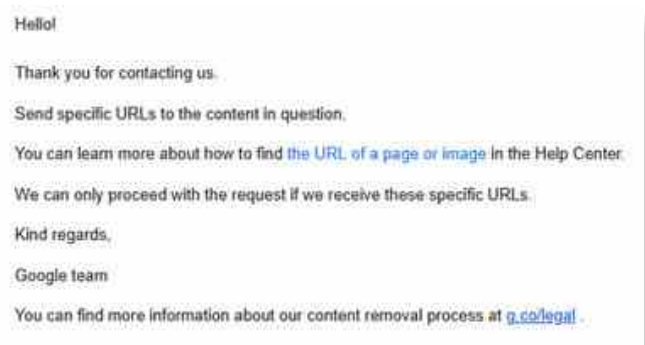
Screenshot taken on 15 April 2026. The ad is the following: https://library.tiktok.com/ads/detail/?ad_id=1856209707327649. It was reported by consumer groups 12 December 2025 and removed by TikTok straight away.

This inconsistency is problematic, since **contents considered illegal under EU rules should be prohibited in all Member States without distinction.**

Google

If a report highlights the illegality of an ad, Google sends a confirmation of receipt. However, when confirmations were sent, they neither indicated the report they related to nor provided specific information that would allow users to track progress.⁶⁶

During the reporting process, Google tried to start ‘conversations’ with users. For instance, the platform asked users for information, such as their place of residence, the applicable law or further details about the alleged infringements, even though this information **was already provided** in the original notice. **These unnecessary questions add no value and discourage users to complete the process.**



Screenshot taken on 16 April 2026. The message was originally sent in Swedish and automatically translated into English

⁶⁶ In other words, if we report 5 ads, we receive 5 confirmations of receipt – but we do not know which e-mail belongs to which report.



Screenshot taken on 16 April 2026. Reply from Google on 20 February 2026.

Similarly to Meta and TikTok, when Google rejected a removal request, it never motivated the decisions. In conclusion, the platform’s notice mechanism appears to be in breach of Art. 16 DSA, as it is difficult to access, remains arbitrary on many levels, incomplete, and ultimately does not serve its purpose.

Insufficient internal complaint-handling system

What the law says

Users submitting removal requests have a right to receive a decision from the platform for each request (Art. 16(6) DSA). If the request is rejected, the platform not only has to motivate its decision but must also inform users about the different redress options. This includes access to the platform’s internal complaint-handling system (Art. 20 DSA). Such a system should be easy to access, effective, timely, non-discriminatory, diligent and non-arbitrary. In addition, it should be able to reassess a previous decision and revert it (Art. 20(1) DSA).

What the platforms say they do

Meta

Meta stresses that it gives users the possibility to appeal decisions (to either remove the ad or reject the removal request) taken on reports about illegal or terms-breaching content.⁶⁷ To our knowledge, Meta does not describe how to reach the internal appeal, how the process is handled, and within which timeframe.

TikTok

TikTok says that when a video, audio, comment, or LIVE violates its policy, the platform removes the content and notifies the user who made the report of the reason. TikTok encourages “everyone to appeal moderation decisions they believe to have been made in error.”⁶⁸

Google

Google may restrict content or accounts when it believes users have violated the law or the platform’s policies. The platform may also decide not to act on a removal request. Whatever the decision, if users disagree, the platform says that “users may wish to first appeal Google’s decision using their internal appeals process if that option is available to users.”⁶⁹

⁶⁷ Meta, ‘Regulation (EU) 2022/2065 Digital Services Act Transparency Report for Facebook’ (25 October 2024), <https://transparency.meta.com/sr/dsa-transparency-report-sep2024-facebook>, p.15 (accessed 16 April 2026).

⁶⁸ TikTok, ‘Moderation and Appeals’, <https://www.tiktok.com/creator-academy/en/article/guidelines-moderation-status-and-appeals> (accessed 17 April 2026).

⁶⁹ Google, ‘European Union Digital Services Act Resolution Options’ <https://support.google.com/european-union-digital-services-act-redress-options/answer/13535501?hl=en> (accessed 16 April 2026).

What consumer groups have found

Meta

Consumer groups used Meta’s internal compliant-handling system nine times. Out of those, Meta removed two ads only. One complaint was ignored. For the remaining six, Meta rejected the appeals arguing that it could not verify whether the ads were lawful or not. Since all the internal appeals concerned clearly illegal ads, this shows the **low effectiveness** of its internal complaint-handling system.

To our knowledge, Meta’s internal complaint system is only available when Meta shares a link with users. This is problematic since, as we explained earlier, the platform often remains silent or avoids issuing formal decisions. **In these cases, there is no link that users can use.** Consequently, they have no access to the internal appeal mechanism. This is a violation of Art. 16 and 20 DSA.

When users have access to the internal compliant-handling system (which means that they received the link), Meta forces users to argue their appeal in a very limited and narrow text block. This makes it difficult to review the wording and makes the process difficult to access and arbitrary.



Screenshot taken on 31 March 2026.

As we showed previously, Meta never motivated its initial decisions. Without facts or legal assessment, users are left with almost nothing to challenge. Consequently, any appeal becomes little more than a mere repetition of the original submission.

Finally, the internal appeal system is **inconsistent and not effective**. Consider for instance the two ads below:



Screenshot on the left taken on 5 February 2026. Screenshot on the right taken on 11 February. Both ads were reported to Meta and Meta rejected both reports. After filing complaints to the internal complaint-handling system, Meta removed the ad to the left for violating Facebook Community Standards. The report for the ad to the right was again rejected.

We believe that both ads breach EU law and Meta’s Terms and Guidelines. They use deceptive language and are particularly appealing to vulnerable people in need of financial support. The ad to the left was removed after the appeal process, while the one to the right was not. This shows two problematic angles of Meta’s internal appeal system. First, it is arbitrary because it generates different outcomes for very similar situations. Second, it is not effective, because both ads should have been removed. Both aspects constitute a breach of Art. 20 DSA.

TikTok

To our knowledge, TikTok's internal complaint system is only available when TikTok shares a link with users. This is problematic because the platform often remains silent or avoids issuing formal decisions.⁷⁰ In such cases, users do not receive any link and therefore cannot access the internal appeal mechanism. This is a violation of Art. 16 and 20 DSA.⁷¹



Screenshot taken on 16 April 2026.

When users have access to the internal complaint-handling system, TikTok requires them to substantiate their claim by using 200 and 400 characters. Yet the appeal should be an effective way to challenge the initial decision. As already pointed out, when users received a decision, it was always in the form of an automated and standardised response without any motivation, facts or legal assessment. Similarly to Meta, appeals thus inevitably amounted to little more than a mere repetition of the original submission. In other limited instances, TikTok provided a link which did not bring users to the internal complaint process, but simply to a new notice submission under Art. 16 DSA.⁷²

If you still consider the content to be illegal, please submit a new [report](#) including clear and specific reasons explaining why you consider the content to be illegal.

Screenshot taken on 16 April 2026.

Google

Based on our research, Google does not allow users to access their internal complaint-handling system directly through its webpages. However, where Google rejected our initial notices, the platform did provide a link to its internal complaint-handling system.



Screenshot taken 20 April 2026.

The response above demonstrates the platform's poor handling of its internal complaint-handling system. Once again, the reply contained no reference to the content of the case. In fact, the decision mentioned "defamation", an issue which we did not raise in our report. In other words, Google's content moderation system was ultimately unable to identify the difference between consumer protection and defamation. This shows how ineffective and arbitrary the platform's internal complaint-handling system appears to be in practice.

⁷⁰ Almost half of all the notices submitted to TikTok by consumer groups were either ignored or the ads were removed before review.

⁷¹ BEUC submitted 60 notices of fraudulent ads to TikTok. TikTok rejected 11 of them and did not provide a link to their internal-complaint handling system in any of the cases.



BEUC The European
Consumer
Organisation

The Consumer Voice in Europe

