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Our Ref 16.10.2026 No 6-2/3259-2

Response to letter regarding online fraud

Dear Minister Krzysztof Gawkowski,

Thank you for your letter.

Estonia recognizes that fraudulent advertising and other forms of online fraud are a growing challenge that undermines trust in the digital economy and harms citizens and businesses alike. Given the cross-border nature of these threats, a coordinated European response is essential. We therefore welcome Poland's initiative in bringing further attention to this issue on the European level.

Estonia considers it vital that online platforms meet their obligations to ensure transparent advertising systems and to respond effectively to reports of illegal activity. Given their reach and influence within the online advertising ecosystem, very large online platforms (VLOPs) under the Digital Services Act (DSA) bear particular responsibilities to assess and mitigate systemic risks related to the functioning of their services, including those linked to impersonation, fraud and coordinated malicious activity. As technologies continue to evolve, platforms must ensure that their risk mitigation measures remain robust and keep pace with emerging risks.

Effective implementation and enforcement of the DSA is crucial to achieving these objectives in practice. Estonia supports the European Commission making full use of its supervisory and enforcement powers to ensure platform compliance with DSA requirements, including in relation to online fraud and fraudulent advertising, and to initiate proceedings where necessary. Close cooperation between the European Commission, Digital Services Coordinators and other competent authorities remains key to consistent and efficient enforcement across the Union.

At the same time, Estonia notes that significant risks are not confined to designated VLOPs. Platforms such as Telegram have also been associated with risks related to illegal activity, including recruitment for criminal purposes. In light of publicly available information regarding its user base, Estonia considers it appropriate to further assess whether Telegram meets the thresholds for designation as a VLOP. Where the relevant criteria are met, the corresponding

DSA obligations should apply, including requirements related to the assessment and mitigation of systemic risks.

Estonia remains ready to engage constructively with Member States and the European Commission, including through the exchange of information, experience and good practices, and to contribute to practical and proportionate approaches to strengthening the European response to online fraud.

With best regards,

(signed digitally)

Liina Vahtras

Minister of Economic Affairs and Communications

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