

Letter to European Commissioner Breton: Tackling harmful recommender systems

Dear Commissioner Breton,

Coimisiún na Meán's [proposal](#) to require social media video platforms to disable recommender systems based on intimately profiling people by default, is an important step toward realising the vision of the Digital Services Act (DSA). We **eighteen** civil society organisations urge you not to block it, and moreover, to recommend this as a risk mitigation measure under Article 35 of the DSA. This is an opportunity to once more prove European leadership.

Disabling profiling-based recommender systems by default has overwhelming support from civil society, the Irish public and cross-group MEPs. More than 60 diverse Irish civil society organisations endorsed a [submission](#) strongly backing this measure, as covered by [the Irish Examiner](#). We are united in our support for this Irish civil society initiative. 82% of Irish citizens are also in favour, as shown in a [national poll](#) across all ages, education, income, and regions of Ireland conducted independently by Ireland Thinks in January 2024. At the end of last year, a cross-party group of MEPs wrote a [letter](#) to the Commission to adopt the Ireland example across the European Union.

Our collective stance is based on overwhelming evidence of the harms caused by profiling-based recommender systems especially for most vulnerable groups such as children – Algorithmic recommender systems select emotive and extreme content and show it to people who they estimate are most likely to engage with it. These people then spend longer on the platform, which allows Big Tech corporations to sell ad space. Meta's own internal research disclosed that a significant 64% of extremist group joins were caused by their [toxic algorithms](#). Even more alarmingly, Amnesty International found that TikTok's algorithms [exposed multiple 13-year-old child accounts](#) to videos glorifying suicide in less than an hour of launching the account.

Platforms that originally promised to connect and empower people have become tools that are optimised to “engage, enrage and addict” them. As described above, **profiling-based recommender systems are one of the major areas where platform design decisions contribute to “systemic risks”, as defined in Article 34 of the DSA**, especially when it comes to “any actual or foreseeable negative effects” for the exercise of fundamental rights, to the protection of personal data, to respect for the rights of the child, on civic discourse and electoral processes, and public security, to gender-based violence, the protection of public health and minors and serious negative consequences to the person's physical and mental well-

being. By determining how users find information and how they interact with all types of commercial and noncommercial content, recommender systems are therefore a crucial design-layer of Very Large Online Platforms regulated by the DSA.

Therefore, we urge the European Commission not only to support Ireland's move, but to apply this across the European Union, and recommend disabling recommender systems based on profiling people by default on social media video platforms as a mitigation measure for Very Large Online Platforms, as outlined in article 35(1)(c) of the Digital Services Act.

Furthermore, we join the Irish civil society organisations in urging the Coimisiún na Meán and the European Commission to foster the development of rights-respecting alternative recommender systems. For example, experts have [pointed](#) to various alternatives including recommender-systems that are built on explicit user feedback rather than data profiling, as well as signals that optimise for outcomes other than engagement, such as quality content and plurality of viewpoint. Ultimately, the solution is not for platforms to provide only one alternative to the currently harmful defaults but rather to open up their networks to allow a marketplace of possible options offered by third parties, competing on a number of parameters including how rights respecting they are, thereby promoting much greater user choice.

We believe these actions are crucial steps towards mitigating against the inherent risks of profiling based recommender systems towards a rights-respecting and pluralistic information ecosystem. We look forward to your support and action on this matter.

Yours sincerely,

1. Amnesty International
2. Civil Liberties Union for Europe (Liberties)
3. Defend Democracy
4. Ekō
5. The Electronic Privacy Information Center (EPIC) Fair Vote UK
6. Federación de Consumidores y Usuarios CECU
7. Global Witness
8. Irish Council for Civil Liberties
9. LODelle
10. Panoptykon Foundation
11. People vs Big Tech
12. The Citizens
13. The Real Facebook Oversight Board
14. Xnet, Institute for Democratic Digitalisation

15. 5Rights Foundation
16. #jesuislà
17. Homo Digitalus

