

Date: 27 August 2025

To Bits of Freedom,

AI Forensics is a European non-profit that conducts independent technical investigations to uncover and expose the harms caused by major technology platforms' algorithms. We have a strong focus on recommender systems, which remain the most influential curators of online content.

We primarily focus on election integrity monitoring due to the immediate impact on democracy and fundamental rights. Moreover, electoral processes are central in the Digital Services Act (DSA) and the EU AI Act, allowing us to disseminate our findings in support of our policy and advocacy efforts.

We have ample experience researching Meta's platforms. Most notably, our research revealing Meta's systemic failure to moderate political ads, allowing pro-Russian propaganda to reach millions, lead to the EU Commission launching investigation proceedings into Meta's breaches on political advertising, marking a significant test of the Digital Services Act's effectiveness against foreign influence operations.

In addition, our research has shown how AI-generated content floods Instagram by gaming the algorithm through visual plausibility and viral potential; and how Meta approved 46k+ fraudulent health advertisements and displayed them 292M+ times to European users since 2023, demonstrating Meta's failure to implement effective risk mitigation measures despite DSA obligations.

We consider the requirement for providers of very large online platforms to offer one option for each of their recommender systems which is not based on profiling, crucial for establishing online spaces in which users have control over their information environment, especially in politically sensitive times.

We are therefore in full support of Bits of Freedom bringing legal action against Meta for violating Articles 38, 27(3) and 25 of Regulation (EU) 2022/2065.

Kind regards,

Marc Faddoul
AI Forensics, Director

