



Council of the European Union  
General Secretariat

**Brussels, 23 September 2025**

**WK 12175/2025 INIT**

**LIMITE**

**TELECOM**

*This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.*

**MEETING DOCUMENT**

---

From: General Secretariat of the Council  
To: Working Party on Telecommunications and Information Society

---

Subject: Article 91 DSA Report - Presentation (TELECOM WP 23/9)

---

Delegations will find attached the presentation "Article 91 DSA Report".

---

WK 12175/2025 INIT

# Article 91 DSA Report

Update on state of play

# Context – Article 91(1) DSA

- **Legal obligation** introduced to **provide clarity** on the interplay of the horizontal nature of the DSA with sector specific laws
- **Evaluate and report** to the European Parliament, the Council and the European Economic and Social Committee on
  - (a) the **application of Article 33** of the DSA (threshold and process for designation), including the scope of providers, and
  - (b) the way that the **DSA interacts with other legal acts**, in particular those listed in Article 4(2) and (3).
- **By 17 November 2025**
- Aligned with the **Digital Simplification package**

# Illustrative list of legal acts under assessment

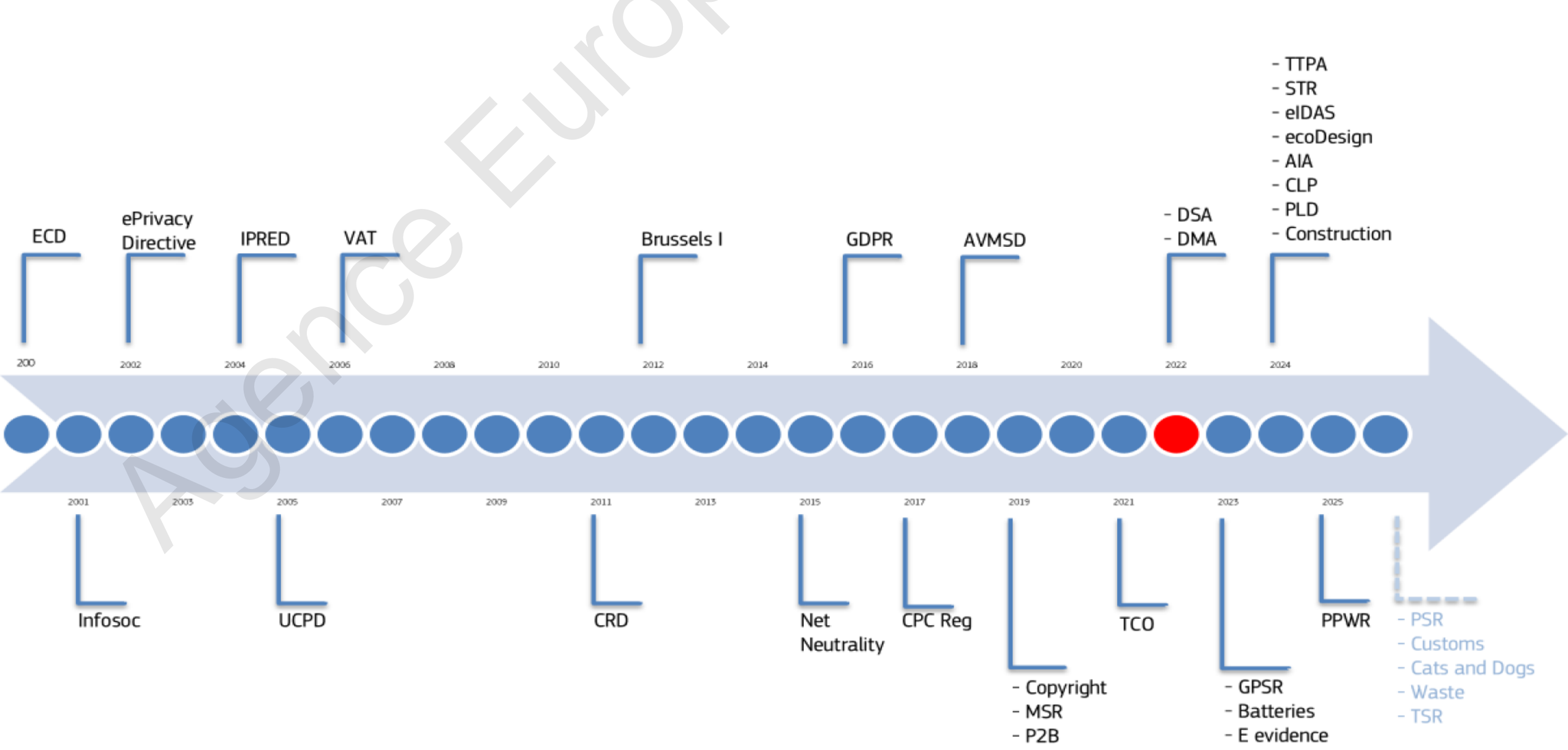
AVMSD	EMFA	Political Advertising	Infosoc Directive	IPRED	DSMCD	CPC Regulation	UCPD	CRD
UCTD	eIDAS2	AIA	Data Regulation	DMA	Data Governance Act	e-Commerce Directive	P2B	Market Surveillance Regulation
GPSR	Short term rental data Regulation	Marketing of Construction Products Regulation	Product Liability Directive	Toy Safety Regulation	Forced Labour Products	Geographical indications	Terrorist Content Online	Explosive precursors
Drugs precursors	Civil and criminal jurisdiction	e-Evidence Package	NIS2	Violence against Women Directive	GDPR	e-Privacy Directive	Ecodesign Regulation	Fluorinated Greenhouse gases and Ozone Layer
Classification, Labelling and Packaging Substances Regulation	Waste Framework Directive revision	Batteries Regulation	Detergents Regulation revision	Packaging and Packaging Waste Regulation	Net neutrality Regulation	VAT Directive	Trade secrets Directive	Deforestation and Forest degradation

(Welfare of cats and dogs Regulation)

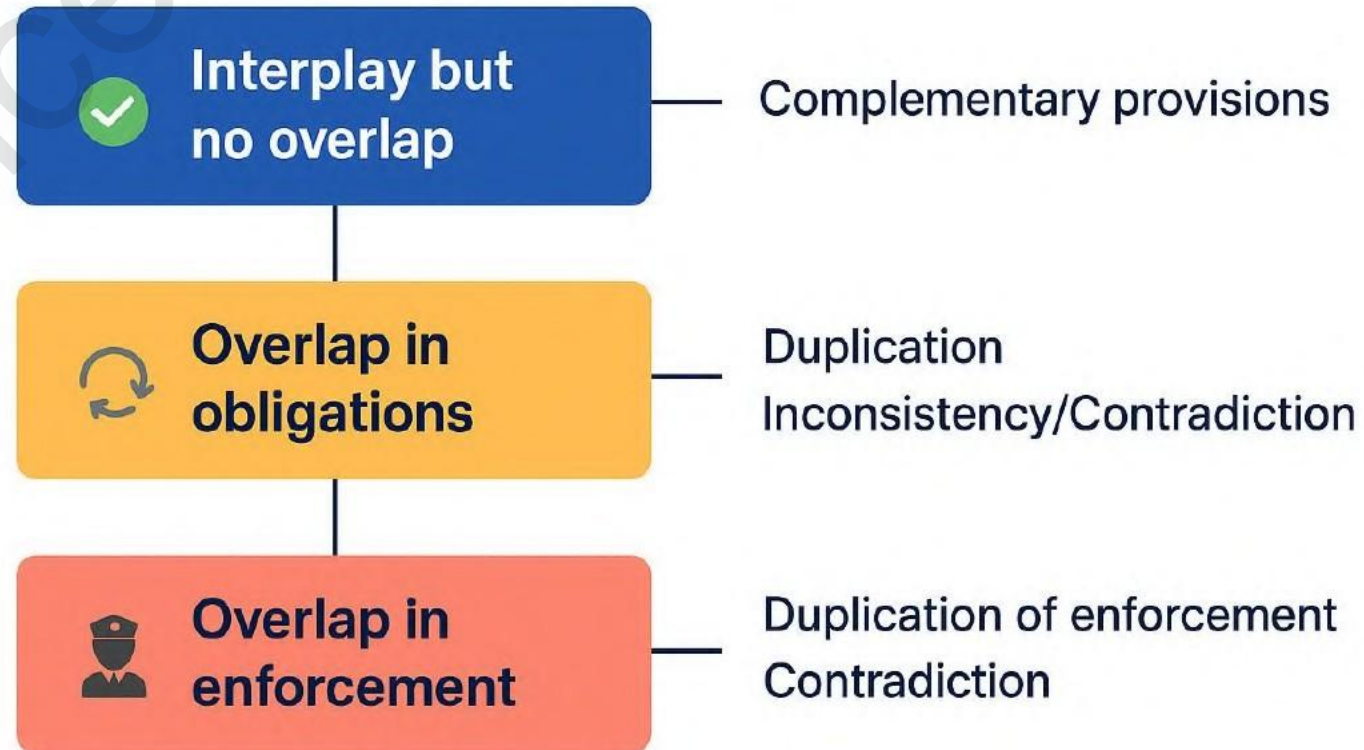
(PSR)

(EU Customs Code revision)

(CSAM Regulation)



# Interplay & Overlap of Rules



# Potential scenarios

Instrument perfectly complementary to the DSA,  
including recent “plug-ins”

Identified space for **simplification / efficiency gains** (and reduction of compliance costs)

Remaining uncertainties