

[IE] Irish media regulator determines that WhatsApp and Pinterest are "exposed to terrorist content"

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On 11 and 16 October 2025, *Comisiún na Meán* (the Commission), the Irish media regulator, made decisions determining that WhatsApp Ireland Ltd. (in respect of the service Channels) and Pinterest Europe Ltd. are "exposed to terrorist content".

The Commission is the Irish competent national authority under Regulation (EU) 2021/784 on addressing the dissemination of terrorist content online (the Terrorist Content Online Regulation). In this role, it is responsible for overseeing the implementation of specific measures required to be taken under Article 5 of the Terrorist Content Online Regulation by hosting service providers that have been deemed to be exposed to terrorist content.

Under Article 5 of the Terrorist Content Online Regulation, hosting service providers that are exposed to terrorist content are required to take certain specific measures to protect their services against the dissemination to the public of terrorist content; these may include mechanisms for users to flag terrorist content to the provider or technical or operational measures to expeditiously remove or disable access to terrorist content. The hosting service provider will be subject to these obligations where it has been deemed, by the competent national authority, to be "exposed to terrorist content" under Article 5(4) of the regulation.

In Ireland, the Commission has adopted a Decision Framework on hosting service provider exposure to terrorist content. Under this framework, the Commission will consider deciding that a hosting service provider is exposed to terrorist content where the provider has received two or more final removal orders during the previous year requiring the provider to remove or disable access to terrorist content. After receiving comments from the provider, the Commission will then make a decision as to whether the provider is or is not exposed to terrorist content.

In exercise of these powers, the Commission has now made decisions that WhatsApp Ireland Ltd. and Pinterest Europe Ltd. are "exposed to terrorist content". As a result, these entities will be obliged to take measures under Article 5 to protect their services against the dissemination to the public of terrorist content.

These decisions mark the third time that the Commission has decided that particular hosting service providers are exposed to terrorist content. On 13 November 2024, the Commission decided that TikTok Technology Ltd., Twitter International UC and Meta Platforms Ireland Ltd. (in respect of Instagram) were exposed to terrorist content. On 16 December 2024, the Commission decided that Meta Platforms Ireland Ltd. (in respect of Facebook) was exposed to terrorist content.

Regulation (EU) 2021/784 on addressing the dissemination of terrorist content online

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021R0784&qid=1762526090705>

Comisiún Na Meán, Notice of Decision that WhatsApp Ireland, in respect of the service Channels, is exposed to terrorist content

<https://www.cnam.ie/app/uploads/2025/10/Decision-Notice-WAIL-16SOct25-ENG.pdf>

Comisiún Na Meán, Notice of Decision that Pinterest Europe Ltd. is exposed to terrorist content

<https://www.cnam.ie/app/uploads/2025/09/Decision-Notice-Pinterest-11Sept25-Eng.pdf>

