EU DSA (Regulation (EU) 2022/2065) Annual Transparency Report for Mozilla

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Introduction

Mozilla is a trusted provider of open-source tools and platforms designed to empower individuals, foster collaboration, and champion privacy and security online. Mozilla's vision is to create a healthier internet that benefits everyone. Its mission is to ensure the internet remains a global public resource, open and accessible to all. As part of that mission, Mozilla is committed to maintaining the safety, integrity, and transparency of its platforms and services for its users, the broader public, and regulators.

This report is published by Mozilla Corporation ("Mozilla") in relation to its online platforms, in compliance with the transparency reporting requirements under Articles 15 and 24 of the European Union's Digital Services Act (Regulation (EU) 2022/2065) ("DSA"). Mozilla is deeply committed to providing transparency to its users, regulators, and the public. This commitment extends to ensuring clarity in how we moderate content, comply with legal orders, and safeguard the integrity of our platforms.

For the purposes of DSA, Mozilla is established in the Netherlands, and is regulated by the Dutch Autoriteit Consument & Markt (ACM). In 2024, Mozilla hosted two platforms that were subject to DSA: the [Firefox Add-ons Marketplace](#) (which hosts Firefox extensions created by third party developers), and [Mozilla.social](#) (a federated social network which was discontinued in December 2024). Data from both products are included in this report.

Mozilla also offers community bulletin boards and customer support fora (such as https://connect.mozilla.org/ and https://bugzilla.mozilla.org/home) that host user-generated content which is moderated by Mozilla. However, those fora are incidental to Mozilla's other products and are not part of our core services, and are therefore not subject to DSA.

Mozilla has traditionally published [semi-annual Transparency reports](#) that included information about its advertising campaigns and public policy work. This report is focused specifically on the information required by the DSA, including (1) content policies and moderation actions and practices on applicable user-generated content platforms; (2) legal demands for user information or content removal; and (3) intellectual property-related complaints and removals in Mozilla products.

Mozilla's Content Moderation Practices

Content shared anywhere in the Mozilla Community must comply with the [Acceptable Use Policies](). In addition, content shared in [Add-ons Marketplace]() is subject to the [Firefox Add-on Policies]().

Use of Automated Tools and Accuracy Metrics

All moderation of content within Mozilla products is performed by humans. We use automated tools to flag high-risk content in limited cases, but we do not take action on that content until a moderator has reviewed it.

All of our content review is conducted by humans: from (1) our moderation vendor's staff, (2) the Add-ons product team, (3) our Trust & Safety Team, or (4) our Legal Team.

For Add-ons Marketplace, we review content in various circumstances. First, we perform a holistic review of certain add-ons when they are submitted to the marketplace to ensure that they are complying with the Firefox Add-On Policies. Our review in these cases consists of scrutinizing the add-on's codebase and features, testing the add-on itself, and/or checking the add-on listing. Second, where we have not previously confirmed that an add-on complies with a specific policy, we may review that add-on in response to a user or third party report—if that report contains sufficient information for us to understand the nature and basis of the alleged violation. Third, our system may automatically flag an add-on for review when certain criteria indicate that it presents a high risk of a violation (for example, where we have received multiple nonspecific reports about the add-on, or where the developer was submitting an add-on for the first time). Because our automated systems only serve to flag high-risk content and all moderation decisions are made by human reviewers, we do not have specific accuracy metrics for the automated tools.

When Mozilla.social was active, we reviewed content in response to reports from users and third parties. Mozilla.social did not leverage automation to flag high risk content or take action on content.

Complaints Received Through Mozilla's Complaint-Handling System

Mozilla interprets this category as including only those complaints that respond to a final moderation action on a specific piece of content. Mozilla's Add-ons Marketplace sees very few complaints in this category, because its process—which (typically) involves a substantive back-and-forth with developers who violate its policies—is designed to facilitate compliance, and provide opportunities for developers to correct violations.

When Mozilla determines that content on the Add-ons Marketplace violates one of the Firefox Add-on Policies, it informs the developer who created the add-on, and generally provides a grace period for the violation to be corrected (except in cases where the violation is egregious). If the violation is addressed in the given time frame, no further action will be taken against the add-on, and there is no opportunity or need for the developer to appeal. Mozilla therefore does not process these kinds of informal exchanges through its appeals system. If the violation is not addressed, the add-on is blocked on the

Add-Ons Marketplace, and is not available for download. Only a response to these actions—where the developer pushes back on the decision without resolving the violation itself—would be counted as an appeal.

Other kinds of Add-ons Marketplace policy violations or moderation-related appeals are reviewed by individual moderators. We are currently building a new complaints-handling system, and have paused the processing of add-on-related appeals until that system is developed.

When the product was live, Mozilla.social's appeals were assessed by members of Mozilla's Trust & Safety Team (though no appeals were received during this reporting period). In some cases, these appeals may be escalated to specific members of the Trust & Safety, Add-ons, or Legal teams.

Moderation decisions for either platform may be reversed when a reviewer found or finds that (1) the prior decision was unsupported by evidence, (2) a secondary review indicates that, in fact, the content actioned was not illegal and/or did not violate Mozilla's policies, or (3) the appealing user's conduct may have violated the law or Mozilla's policies, but did not justify Mozilla's enforcement response.

Training and Support for Content Moderators

Our Trust & Safety Team is responsible for updating and maintaining our Acceptable Use Policy and developing training materials and guidelines for our moderator and product teams. The Add-ons Team is responsible for updating and maintaining the Firefox Add-on Policies, and for working with our Trust & Safety team to ensure that training materials related to those policies are kept up-to-date.

We maintain internal implementation guidelines and policy decision trees, which our moderators are expected to review and adhere to. Moderators are first trained on sample report data, and individual moderators must meet a minimum accuracy threshold before moderating production reports. Moderators have ongoing access to Trust & Safety team members via Slack and can escalate questions and share information in real time, as issues arise. The Add-ons, Trust & Safety, and Legal Teams discuss moderation practices and escalations regularly and refine guidelines as needed.

Mozilla tracks the number of appeals associated with each policy, as well as the performance of each individual moderator. Where reversals are common, additional policy training may be provided to moderators, or policy language may be revised to increase clarity.

Government Orders and Legal Notices

Mozilla accepts valid legal orders for content removal and user information via email at legalrequest@mozilla.com. Mozilla requires a valid Legal Process—such as a warrant, court order, MLAT request, or letter rogatory—before it will disclose individual user data to a government agency or representative, and interprets legal requests narrowly.

The majority of the government requests that Mozilla receives are from law enforcement agencies in the United States. In 2024, Mozilla received seven requests directly from EU government agencies.

Additional information about those requests and Mozilla's responses are included in section 1.1 of this report.

Section 1: Article 9 and 10 Orders from Member States' authorities

Article 15(1), point (a)

1.1 Number of notices received from EU Member States

Table 1: Number of notices received from EU Member States, by type of alleged illegal content

Member State		Type of notice	Type of alleged illegal content
Austria	1	Order to provide information	Fraud
France	1	Order to provide information	Fraud
Germany	4	Order to provide information	Blackmail
		Order to provide information	Fraud
		Order to provide information	Fraud
		Order to provide information	Hate crime
Poland	1	Order to provide information	Terrorism
Total notices	**7**		

1.2 Median time to inform the authority of receipt of an Authority Order

Mozilla does not provide a separate confirmation of receipt. It informs the issuing authority that it received an order by responding to that same order.

Mozilla's median response time was 11 calendar days.

1.3 Median time to give effect to the order

Mozilla's median response time was 11 calendar days. Some responses took far longer than this, while others took less than a week.

Section 2: Notices received through notice and action mechanisms
Article 15(1), point (b)

2.1 Number of notices submitted in accordance with Article 16, categorized by type of alleged illegal content

Mozilla.social

Mozilla did not receive any requests regarding content on Mozilla.social that fell within scope of Article 16.

Add-ons Marketplace

Between 2/17/2024—12/31/2024, we received a total of 7,530 Article 16 reports. These reports covered all types of content on the Add-ons Marketplace: including add-on listings, users, collections, and ratings.

Table 2: Number of Article 16 notices submitted, by type of alleged illegal content

Type of reported illegality	Number of Article 16 notices
Animal welfare	35
Consumer information infringements	431
Data protection and privacy violations	438
Illegal or harmful speech	50
Intellectual property infringements[1]	115
Negative effects on civic discourse or elections	22
Non-consensual behavior	111
Pornography or sexualized content	44
Protection of minors	20
Risk for public security	77
Scams or fraud	4,674
Self-harm	24
Unsafe, non-compliant, or prohibited products	76
Violence	22

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[1] The "intellectual property infringements" category includes user reports of copyright or trademark infringement that were emailed to dmcanotice@mozilla.com, as well as those reports submitted through our copyright and trademark infringement reporting form.

Other*	1,391
Total Article 16 notices	**7,530**

*Reports in the "Other" category (totaling 1,391 reports) included 1,170 uncategorized Article 16 reports (filed using our former reporting form), and 221 Article 16 reports that were filed using the current form, where the "Other" category was deliberately selected.

2.2 Number of Article 16 notices submitted by Trusted Flaggers
Mozilla did not receive any Article 16 from Trusted Flaggers during the reporting period.

2.3 Number of Article 16 notices processed by automated means
All reports, including Article 16 notices are processed manually, by individual members of our Moderation, Product, or Trust & Safety Teams. Mozilla does not use automated processing for content moderation.

Section 3: Content moderation engaged in at Mozilla's own initiative
Article 15(1), point (c)

Content moderation engaged in at Mozilla's own initiative includes moderation actions against content not associated with at least one Article 16 notice, for both Mozilla.social and the Add-ons Marketplace. See **Section 2: Notices received through notice and action mechanisms** for more information about moderation activity on content associated with Article 16 reports.

3.1 Number of user reports received, categorized by report reason

Mozilla.social

Table 5: Number of Mozilla.social user reports received, by reason

Report category		Count
Other		112
Spam		633
Violation	Child sexual abuse	4
	Fraud or counterfeit goods	2
	Illegal goods and services	4
	Impersonation	10
	Harassment	27

	Hate speech	20
	Misinformation	7
	Privacy violation	5
	Self-harm	7
	Sexual content	12
	Violent content	21
Total reports		**864**

Add-ons Marketplace

Reports in categories C–F are enqueued for human review. Of these, reports in Category E ("It violates the law or contains content that violates the law") are considered Article 16 notices, as discussed in **Section 2.**

Mozilla implemented a new reporting process in 2024. Users who have not updated Firefox since December 2023 continued to see our former reporting system, and their reports can not be seen by our moderators due to technical limitations. We expect to resolve this limitation in 2025, but until that point, these reports will remain unresolved.

Reports in categories A–B are not enqueued for human review, and are instead used in aggregate as one potential signal for determining queue prioritization, as discussed in **Section 1: Use of Automated Tools and Accuracy Metrics.**

Table 6: Number of Add-ons Marketplace user reports received, by reason

Report category		Report volume
A	It doesn't work, breaks websites, or slows down Firefox	69,366
B	It's spam	17,575
C	It violates Mozilla's Add-on Policies	10,856
D	It contains hateful, violent, deceptive, or other inappropriate content	4,196
E	It violates the law or contains content that violates the law	7,530
F	Something else	21,701
Total reports		**131,224**

3.2 Number of actions taken at Mozilla's own initiative, categorized by type of violation

Mozilla.social

Table 7: Number of Mozilla.social actions taken at Mozilla's own initiative, by type of violation

Violation type	Actions taken
Copyright	13
Harassment	4
Hate speech	3
Sexual content	1
Spam	672
Violent content	3
Total actions	**696**

3.3 Number of actions taken at Mozilla's own initiative, categorized by type of restriction applied

Mozilla.social

Table 9: Number of Mozilla.social actions taken at Mozilla's own initiative, by type of restriction applied

Violation type	Actions taken
Delete status	38
Disable account	672
Suspend account	8
Total actions taken	**718**

During this reporting period, we made significant improvements to our content moderation systems, impacting data management processes and procedures. We have temporarily omitted the following information while we verify data accuracy, quality, and completeness:

- Number of Add-ons Marketplace actions taken on content associated with Article 16 notices, categorized by type of violation
- Number of Add-ons Marketplace actions taken on content associated with Article 16 notices, categorized by type of restriction applied
- Median time to take action on content associated with Article 16 notices
- Number of Add-ons Marketplace actions taken at Mozilla's own initiative, by type of violation
- Number of Add-ons Marketplace actions taken at Mozilla's own initiative, by type of restriction applied

An updated report will be published on or before **March 1, 2025.**