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Commission: ChatGPT, Reddit and Roblox Are Very Large Online Services

The European Commission has designated OpenAI's chatbot as a "very large" search engine — a first for generative AI — while Reddit and Roblox join the EU's list of very large platforms. All three now have until the end of November to comply with the DSA.

The European Commission on Monday designated ChatGPT, Reddit and Roblox as "very large" online services under the EU's Digital Services Act (DSA), pulling all three into the bloc's strictest tier of digital regulation for the first time.

ChatGPT has been classified as a Very Large Online Search Engine (VLOSE), the first time an AI chatbot has been placed in that category. Reddit and Roblox have been designated Very Large Online Platforms (VLOPs), the same tier that already covers Meta's Facebook and Instagram, TikTok, X and Amazon.

All three services had disclosed user numbers above the DSA's threshold of 45 million average monthly users in the EU — roughly one in ten people in the bloc. According to the Commission's own figures, ChatGPT's search function averaged 159.1 million monthly users in the EU over the six months to 31 March 2026; Reddit reported 57.2 million, and Roblox reported 46.6 million.

Why ChatGPT is being treated as a search engine

The Commission concluded that ChatGPT functions as what it called a "hybrid service": a chatbot that also searches the web and returns results in response to user prompts and therefore meets the DSA's definition of an online search engine rather than simply an online platform. Reddit and Roblox, by contrast, were designated as platforms because they let users publish and share content with the wider public.

Henna Virkkunen, the Commission's executive vice-president for tech sovereignty, security and democracy, said the designations meant the three services would be "held to a higher standard of scrutiny and accountability" in the EU. The Commission said separately that it would "not hesitate" to designate further platforms that cross the threshold.

What the three services must now do

The designations start a four-month countdown, running to the end of November, by which point ChatGPT, Reddit and Roblox must comply with the DSA's most demanding obligations

- Annual assessments of "systemic risks", covering the spread of illegal content, harm to minors and to users' physical and mental wellbeing, and threats to fundamental rights, electoral processes and public security;

-proportionate measures to mitigate those risks, which can extend to redesigning recommender systems;

-an independent audit at least once a year;

-data-sharing with the Commission, national regulators and vetted researchers studying systemic risk; and

- A publicly available advertising repository and a recommender-system option that does not rely on user profiling.

Day-to-day supervision is split between Brussels and national regulators. Ireland's Coimisiún na Meán is the digital services coordinator for ChatGPT, whose EU entity, OpenAI Ireland Limited, is based in Dublin. Reddit and Roblox, meanwhile, fall under the Dutch coordinator, the Authority for Consumers and Markets (ACM): Reddit through its Netherlands-registered EU entity, and Roblox through a legal representative it has appointed in the Netherlands

The bigger picture

The move brings the number of services in the DSA's strictest tier to 28, spanning search engines, social networks, marketplaces, gaming and now, for the first time, a generative AI product. The DSA's enforcement record already runs to roughly €870 million in fines against very large platforms: €550 million against AliExpress in July 2026 for failing to properly assess and mitigate the risk of illegal, unsafe or counterfeit goods on its marketplace; €200 million against Temu in May 2026 for a similarly inadequate risk assessment of illegal products; and €120 million against X in December 2025 – not, as

sometimes reported, for content moderation, but specifically for breaching the DSA's transparency rules through a deceptive "verified" checkmark, a non-functional advertising repository and blocked access to data for researchers

Non-compliance with the DSA can, in principle, be punished with fines of up to 6 per cent of a company's global annual turnover.

The timing is politically delicate. Washington has repeatedly denounced separate EU penalties against American technology companies — the White House branded fines levied on Apple and Meta under the bloc's Digital Markets Act, a related but distinct law, a "novel form of economic extortion" — and has them as trade barriers. Monday's designations bring three more American-owned services under direct commission supervision at a moment when transatlantic tensions over Brussels's tech rulebook are already running high.