

A Right to Know: Transparency and Notification of Automated Visibility Restrictions in Digital Information Services

For the purposes of this proposal, “**Digital Information Services**” means services that algorithmically determine the visibility, ranking, recommendation, retrieval, or presentation of information to users, including search engines and AI-powered search and answer services.

2. Executive Summary

Digital information services increasingly determine what information users see, find, and access. Search engines and AI-powered search and answer services use automated systems to rank, filter, recommend, retrieve, and present information.

When these automated systems materially reduce the visibility of a website or other information source, the affected owner may experience a significant loss of visibility without being informed that an automated restriction or demotion has occurred. Existing transparency mechanisms can provide information about performance and general ranking principles, but they do not necessarily provide notice that a material automated visibility restriction has been applied to an individual website.

This proposal calls for a limited transparency requirement: when an automated system materially restricts the visibility of a website or information source, the affected owner should be informed that the restriction has occurred and provided with a general explanation of the reason or category of reason.

The **Ranking Restriction Information Right (RRIR)** would not require disclosure of proprietary algorithms, ranking signals, thresholds, security mechanisms, or other information that could facilitate manipulation or abuse. Its purpose is simply to provide meaningful notice and basic accountability where an automated decision materially affects the visibility of information.

The proposal therefore asks EU policymakers to examine whether the existing legal and regulatory framework provides sufficient protection in this area and, if not, whether a specific notification and general-reason requirement should be introduced.

3. The Problem

Digital information services can materially reduce the visibility of a website or other information source through automated systems. A significant loss of visibility can occur without the affected website owner being informed that an automated restriction, demotion, or other limiting action has taken place.

This creates a fundamental transparency problem. The owner may observe a substantial decline in impressions, clicks, traffic, rankings, or discoverability, while having no clear indication whether the change results from ordinary changes in ranking, a technical issue, a change in user behaviour, or an automated system applying a restriction.

Search Console and similar reporting tools can provide extensive information about the consequences of changes in visibility. However, performance data does not necessarily identify whether an automated restriction has been applied or provide a general reason for such an action.

The result is an asymmetry of information: the service can make an automated decision that materially affects the visibility of a website, while the affected owner may not even know that such a decision has been made.

4. The Transparency Gap

There is an important distinction between a **manual action** and an **automated restriction or demotion**.

A manual action is an explicit enforcement measure identified by the service and communicated to the affected website owner through an established notification mechanism. EU law also requires hosting services to provide statements of reasons when they impose certain automated restrictions—such as removal, disabling access, or demotion—based on illegality or incompatibility with their terms and conditions. However, this obligation applies to hosting services and does not extend to search engines or other digital information services that algorithmically determine visibility. As a result, EU law does not establish a general notification right for material automated ranking restrictions affecting website visibility in search services.

An automated restriction or demotion can operate differently. An automated system may materially reduce the visibility of a website without the owner receiving a notification that an enforcement-related decision has occurred. The resulting loss of visibility may therefore appear only as a change in search performance.

This creates a significant transparency gap. The absence of a manual-action notification does not necessarily tell the website owner whether an automated restriction has occurred. At the same time, performance reports generally describe outcomes rather than identifying the specific automated decision or intervention responsible for those outcomes.

The issue is therefore not a demand for disclosure of the underlying algorithm. It is the absence of basic notice that a material automated restriction has occurred.

5. What Already Exists in EU Law

The European Union already has several legal frameworks addressing ranking transparency, algorithmic systems, platform accountability, and the treatment of businesses by major digital services. These frameworks provide an important foundation for the proposal, but they do not currently establish the specific notification right proposed here.

5.1 Platform-to-Business Regulation (P2B)

Regulation (EU) 2019/1150 requires providers of online search engines to publicly describe the main parameters that are most significant in determining ranking and their relative importance. The regulation explicitly states that providers are not required to disclose their algorithms or the detailed functioning of their ranking mechanisms.

The P2B Regulation therefore establishes an important principle: **ranking transparency can be required without requiring algorithmic disclosure**.

It also contains a specific provision for situations in which a search engine alters ranking or delists a website following a third-party notification: the corporate website user must be given the possibility to inspect the contents of that notification.

However, the regulation does **not** establish a general requirement to notify a website owner whenever an automated ranking system materially demotes or restricts the visibility of that website.

5.2 Digital Services Act (DSA)

The Digital Services Act establishes broader transparency and accountability obligations for online platforms and, in particular, very large online platforms and very large online search engines.

For online platforms using recommender systems, Article 27 requires disclosure of the main parameters used by those systems and the reasons for their relative importance. The DSA also requires very large online search engines to assess systemic risks arising from the design or functioning of their services and related algorithmic systems.

The DSA also gives the European Commission and Digital Services Coordinators powers to request information and, in appropriate circumstances, obtain explanations concerning the design, logic, functioning, and testing of algorithmic systems from very large online platforms and very large online search engines.

However, these mechanisms primarily create **transparency and accountability towards regulators, researchers, and users**. They do not establish a general individual right for a website owner to be notified when an automated search system materially restricts that website's visibility.

5.3 Digital Markets Act (DMA)

The Digital Markets Act creates additional obligations for designated gatekeepers and addresses fairness and contestability in digital markets.

Its relevance to this proposal is particularly clear in relation to Google Search. In July 2026, the European Commission found Google in breach of the DMA because it gave preferential treatment to its own services in Google Search. The Commission stated that gatekeepers must apply **transparent, fair and non-discriminatory conditions to ranking**.

The Commission has also been investigating possible demotion of media publishers' content in search results under the DMA framework.

The DMA therefore demonstrates that **search ranking and demotion can already be matters of EU regulatory scrutiny**. However, it does not currently create the specific notification right proposed in this document.

5.4 What the Existing Frameworks Establish

Taken together, these laws establish several important principles:

- Ranking is subject to transparency requirements.
- Demotion and other mechanisms affecting visibility are recognized within EU regulatory frameworks.
- Algorithmic systems can be subject to regulatory scrutiny.
- Very large search engines can be required to explain their systems to regulators.
- Transparency does not necessarily require disclosure of proprietary algorithms.
- Search ranking can be subject to fairness and non-discrimination requirements.

5.5 What They Do Not Currently Provide

The existing framework does not clearly establish a general right for a website owner to receive **individual notification that an automated system has materially restricted or demoted the visibility of their website**, together with a general explanation of the reason for that restriction.

This is the specific transparency gap addressed by this proposal.

The proposed measure would therefore **extend an existing EU principle rather than create an entirely new regulatory concept**: where automated systems can materially affect the visibility of information, the affected party should at least be informed that a material restriction has occurred and given a general reason, while the provider remains protected from having to disclose its algorithms or sensitive detection mechanisms.

6. The Ranking Restriction Information Right (RRIR)

This proposal seeks to establish a narrow and proportionate transparency right for website owners affected by material automated visibility restrictions.

When an automated system materially restricts the visibility of a website in a search service, the affected website owner should be informed that such a restriction has occurred and provided with a general explanation of the category of reason for the restriction.

Where a service has identified a specific policy or compliance issue that is reasonably expected to result in a material automated restriction, the affected website owner should, where reasonably practicable, receive prior notice and a reasonable opportunity to address the identified issue before the restriction takes effect. Where a material restriction results from a dynamic or continuously operating automated evaluation and prior notice is not reasonably practicable, the notification should be provided after the restriction has taken effect.

The notification should identify the existence and general nature of the restriction without requiring the service provider to disclose the specific algorithmic mechanism that produced the decision.

The **RRIR** would not require disclosure of:

- proprietary algorithms;
- individual ranking signals;
- ranking thresholds or weighting;
- anti-spam or abuse-detection mechanisms;
- security-sensitive information; or
- information that could materially facilitate manipulation of the service.

The objective is therefore not algorithmic transparency in the sense of revealing how the system works. It is **decision transparency**: where an automated system materially restricts the visibility of a website, the affected owner should at least know that the restriction occurred and the general category of reason behind it.

The proposed requirement should apply only to material restrictions that have a significant and sustained effect on the visibility or discoverability of a website or information source, rather than to ordinary ranking fluctuations, routine algorithmic changes, or insignificant changes in visibility.

Materiality should be assessed using objective and proportionate criteria established by the relevant regulatory framework.

Prior notification should not be required where providing advance notice would materially compromise the prevention or detection of fraud, spam, security threats, coordinated manipulation, or other forms of abuse. Where appropriate, the service should still be able to provide notification after the restriction has taken effect.

7. Why This Is Reasonable

The **RRIR** is limited, practical, and consistent with existing principles of transparency and accountability in EU digital regulation.

7.1 Transparency

Website owners should not be required to rely solely on indirect changes in traffic, impressions, rankings, or visibility to determine whether an automated restriction has affected them. Basic notification would provide transparency about a material decision that directly affects the visibility of their information.

7.2 Ability to Investigate and Correct Genuine Problems

If a restriction results from a genuine problem, knowing that an automated restriction has occurred and understanding its general category would allow the website owner to investigate the relevant issue and take appropriate corrective action.

Without such notice, an owner may spend significant time attempting to diagnose a problem without knowing whether an automated restriction exists at all.

7.3 Distinguishing Restriction from Ordinary Ranking Fluctuation

Search rankings naturally change. A decline in visibility does not necessarily indicate a penalty, restriction, or other enforcement action.

A notification requirement limited to **material automated restrictions** would help distinguish such an intervention from ordinary ranking fluctuations and changes in search behaviour.

7.4 Accountability Without Algorithm Disclosure

The **RRIR** does not require a service provider to reveal how its algorithms work.

A provider could remain free to protect proprietary ranking systems, anti-abuse mechanisms, thresholds, signals, and security-sensitive information while still informing the affected website owner that a material automated restriction has occurred and providing a general category of reason.

This creates a balance between **the legitimate need to protect automated systems and the legitimate need of affected parties to know when a material automated intervention has taken place.**

8. Safeguards

The proposed notification right should be accompanied by safeguards to ensure that transparency does not undermine the security, integrity, or legitimate operation of digital information services.

8.1 Material Restrictions Only

Notification should be required only where an automated system causes a **material restriction of visibility**. Ordinary ranking fluctuations, minor changes in visibility, temporary technical events, or normal changes in search results should not automatically trigger a notification.

8.2 Protection of Proprietary Algorithms

The proposal should not require disclosure of proprietary algorithms, source code, ranking formulas, internal system architecture, or other commercially sensitive information.

8.3 Protection of Anti-Spam and Abuse-Detection Systems

Service providers should not be required to reveal specific anti-spam signals, detection methods, thresholds, or other mechanisms whose disclosure could enable manipulation or circumvention.

8.4 Security, Fraud, and Abuse Exceptions

Appropriate exceptions should apply where providing information could materially undermine the prevention or detection of fraud, spam, security attacks, coordinated manipulation, or other forms of abuse.

Such exceptions should not automatically eliminate the possibility of notification. Where appropriate, the service should still be able to inform the affected owner that a restriction has occurred while withholding information that could compromise security or enforcement mechanisms.

9. Requested Action

The relevant European Union institutions are respectfully requested to:

1. **Assess whether the existing EU legal and regulatory framework adequately addresses material automated restrictions of visibility** affecting website owners and other information providers.
2. **Assess whether additional legislation, amendments, regulatory guidance, or other measures are necessary** to provide meaningful transparency in cases where automated systems materially restrict visibility.
3. **Examine the introduction of a notification-and-general-reason requirement** for material automated visibility restrictions, whereby the affected website owner would be informed that such a restriction has occurred and provided with a general explanation of the category of reason.
4. **Consider appropriate safeguards and exceptions** to ensure that such a requirement does not oblige digital information services to disclose proprietary algorithms, ranking signals, security mechanisms, anti-spam systems, or other information whose disclosure could facilitate manipulation, fraud, or abuse.

The objective is not to interfere with legitimate ranking decisions or require disclosure of proprietary technology, but to establish a proportionate minimum level of transparency when automated systems materially affect the visibility of information.

10. About the Proposer

Marin Popov

Founder, 1 Euro SEO

Marin Popov is a technical SEO consultant and software engineer with a background in telecommunications and software engineering. He is the founder of **1 Euro SEO**, an automated SEO and website analysis platform focused on making technical and strategic website analysis accessible to businesses.

His work involves studying how websites are interpreted, evaluated, and represented by search engines and AI-driven information systems, with particular attention to machine readability, structured data, semantic relationships, and automated evaluation systems.

He is raising this issue from a practical perspective: website owners can experience substantial changes in digital visibility without receiving clear information about whether an automated restriction has occurred or, where one has occurred, the general category of reason behind it.

The proposal is intended as a policy question concerning transparency and accountability in automated digital information systems, rather than as a complaint about any individual website or ranking decision.

11. Appendix / Sources

11.1 EU Legislation

Regulation (EU) 2019/1150 — Platform-to-Business Regulation (P2B)

Article 5 establishes transparency requirements concerning the main parameters determining ranking by online search engines. Article 5(4) also addresses cases where a search engine alters ranking or delists a website following a third-party notification. ([EUR-Lex](#))

[EUR-Lex — Regulation \(EU\) 2019/1150](#)

Regulation (EU) 2022/2065 — Digital Services Act (DSA)

The DSA establishes transparency and accountability obligations for online platforms and very large online search engines, including obligations concerning recommender systems and systemic risks arising from algorithmic systems. ([EUR-Lex](#))

[EUR-Lex — Regulation \(EU\) 2022/2065](#)

Regulation (EU) 2022/1925 — Digital Markets Act (DMA)

The DMA establishes obligations for designated gatekeepers and includes requirements concerning fair and non-discriminatory treatment in ranking. ([EUR-Lex](#))

[EUR-Lex — Regulation \(EU\) 2022/1925](#)

11.2 European Commission Decisions and Proceedings

Commission investigation into Google's demotion of publishers' content in Google Search — 13 November 2025

The European Commission formally opened proceedings to assess whether Google's demotion of publishers' websites and content under its site reputation abuse policy complies with the DMA.

([Digital Strategy](#))

[European Commission — Investigation into Google Search demotion of publishers](#)

Commission decision concerning Google's self-preferencing in Google Search — 23 July 2026

The European Commission found Google in breach of the DMA concerning preferential treatment of its own services in Google Search and stated that gatekeepers must apply transparent, fair and non-discriminatory conditions to ranking. ([Digital Strategy](#))

[European Commission — Commission fines Google €890 million for DMA breaches](#)

11.3 Digital Services Act and Algorithmic Transparency

European Commission — DSA: Very Large Online Platforms and Very Large Online Search Engines

The Commission describes the additional obligations applying to VLOPs and VLOSEs, including systemic-risk assessment, mitigation measures, algorithmic-system oversight, auditing, and data access. ([Digital Strategy](#))

[European Commission — DSA: Very Large Online Platforms and Search Engines](#)

European Commission — Second Report on Systemic Risks on Very Large Online Platforms and Search Engines under the DSA — 2 July 2026

The report addresses systemic risks and mitigation measures concerning VLOPs and VLOSEs and forms part of the DSA transparency and accountability framework. ([Digital Strategy](#))

[European Commission — Second Report on Systemic Risks](#)

European Centre for Algorithmic Transparency — DSA data access for researchers

The European Centre for Algorithmic Transparency explains the DSA framework under which vetted researchers can request data from VLOPs and VLOSEs for research into systemic risks. ([ECAT](#))

[European Centre for Algorithmic Transparency — DSA Data Access for Researchers](#)

11.4 Relevant European Commission Material Concerning Google Search and AI

Commission guidance concerning Google Search data sharing under the DMA — 16 July 2026

The Commission adopted binding measures requiring Google to provide eligible competing search engines with access to certain Google Search data, including measures relevant to AI services offering search functionality. ([Digital Markets Act \(DMA\)](#))

[European Commission — Google Search Data Sharing under the DMA](#)

11.5 Designation of Google Search as a Very Large Online Search Engine

Official Journal of the European Union — Designation of Google Search as a VLOSE

Google Search is designated as a very large online search engine under Article 33(4) of Regulation (EU) 2022/2065. ([EUR-Lex](#))

[Official Journal of the European Union — VLOPs and VLOSEs designated under the DSA](#)