

Brussels
16.01.2026

Dear Executive Vice-President Virkkunen,

I write to you with the utmost urgency regarding the ongoing and deeply troubling situation involving the platform X and its integrated AI chatbot Grok, specifically concerning the generation and distribution of non-consensual and illegal sexually explicit content, including material involving minors.

Grok's image generation features have been used to create large volumes of sexualised deepfake imagery, including instances involving minors. It is my view that these outputs amount to child sexual abuse material. These concerns have triggered investigations by national authorities across the EU and beyond, including by France and Ireland.

I welcome your recent public statement that *"X now has to fix its AI tool in the EU, and they have to do it quickly,"* and your clear commitment that, should this fail to occur, *"the European Commission is ready to strike under the Digital Services Act"* and *"will not hesitate to put the DSA to its full use to protect EU citizens."*

This clarity is important and necessary. However, given the seriousness of the harms already documented - particularly the generation and circulation of sexualised and potentially illegal material involving minors - I believe the threshold for decisive enforcement action has already been met. In circumstances involving child sexual abuse material, speed, proportionality and prevention must be paramount, and interim or preparatory steps alone risk falling short of the level of protection that EU law requires.

The current measures implemented by X, including restrictions on image creation limited to paid subscribers, do not effectively mitigate the underlying risk of illegal deepfakes and may leave avenues open for users to generate and disseminate criminal content.

The repeated creation and circulation of sexualised and potentially illegal content involving minors and vulnerable individuals constitutes a systemic risk to fundamental rights and child protection, squarely within the scope of the DSA's risk mitigation obligations for Very Large Online Platforms.

Failure to address these issues decisively threatens both the credibility of EU digital safety frameworks and the security of children and other vulnerable citizens in the Union.

Under Articles 51–54 of the DSA, persistent, systemic non-compliance with core platform obligations; including the requirement to prevent, remove, and effectively mitigate the dissemination of illegal content; can justify proportional enforcement actions up to and

including temporary suspension of access to the relevant service within the EU. Such measures have, at their core, the obligation to protect fundamental rights and safety, especially where more incremental remedies have failed to produce tangible results.

In light of these ongoing developments and the scale of potential harm, I respectfully urge the Commission to:

- **Conduct an expedited and comprehensive DSA compliance review** regarding X's handling of Grok-generated sexualised imagery, with particular emphasis on safeguarding against child sexual abuse imagery and other illegal content;
- **Issue formal, binding compliance orders under the DSA** directing X to implement technically robust and verifiable safeguards that demonstrably prevent the generation and dissemination of illegal and exploitative content — including, if necessary, disabling relevant features that cannot meet this standard; and
- Prepare the necessary legal groundwork for **enforcement actions, including the possibility of banning access to the service in the EU**, as X has repeatedly failed to meet its obligations under the DSA and continues to allow the dissemination of illegal material.

Ensuring that digital platforms do not become vectors for abuse, especially where children are concerned, is not only a legal imperative under the DSA but a moral one. The EU's digital rulebook sets high standards for the protection of users' rights and safety; these standards must be upheld without compromise.

I would be grateful for an update on the Commission's assessment of these concerns and the range of enforcement options under active consideration.

Yours sincerely,



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MEP for Dublin