

To: European Commission (via online portal)

9th February 2026

RE: RESPONSE TO CALL FOR EVIDENCE ON FIGHTING ONLINE FRAUD INITIATIVE:

The Online Dating and Discovery Association (ODDA) is the recognised trade body for the sector with a mission to create safe, responsible and enjoyable experiences for everyone. Representing nearly 500 brands world-wide, tackling fraud is the number one priority for our members. We would therefore like to thank the European Commission for the opportunity to respond to this call for evidence on such an important topic.

The ODDA welcomes the strategic aims of the Initiative which seek to increase efficiency at every stage of the anti-fraud cycle by supporting complementary actions between anti-fraud actors in the prevention, detection, investigation, correction and prosecution of fraud. We firmly believe that recent efforts by the Commission to harmonise the legal framework across Member States sets a solid foundation for these aims to be achieved.

In terms of the specific problems the Initiative seeks to address, we are pleased to see recognition of the growing use of Artificial Intelligence (AI) by fraudsters, which has become increasingly sophisticated over the last few years. It has also enabled a significant increase in the scale of attacks against users across Europe.

We also welcome the reference to improving reporting which will inform a better understanding of the problem as well as providing more opportunities for targeted interventions. However, this work cannot be done in isolation and must be underpinned by improvements to victim support which we are pleased to see acknowledged in the Initiative.

Similarly, we also welcome the recognition of coordination and collaboration between public authorities as a priority area. A lack of clarity around roles and responsibilities can lead to confusion, duplication or missed opportunities to tackle the problem effectively. This is particularly important in tackling organised crime where perpetrators are based overseas requiring a more joined-up approach to close down scam centres and bring offenders to justice. To address this, coordination and collaboration must take place at a global level and importantly, involve countries outside the European Union.

However, there is an urgent need to improve information sharing between public authorities and the private sector, particularly across different sectors – a point we raised at the Constructive Dialogue on Technical Assistance and International Cooperation in Vienna last year. In our evidence, we said that more effort should be made to bring key stakeholders together at an international level to explore ways of improving information sharing. We called on international governments to take the lead and use the levers they have available to them to address this gap.

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Finally, we are pleased to see the misuse of advertising included in the list of problems the initiative seeks to tackle. This is something that our members with users in the UK have seen at first hand where fraudsters have created fake age assurance adverts to trick consumers into handing over personal data which can then be used to commit fraud. We wrote to Ofcom, as the regulator of the Online Safety Act in the UK, to bring forward their work in tackling fake adverts following the lessons learned from the implementation of Highly Effective Age Assurance.

We would like to thank the Commission once again for the opportunity to provide feedback on the Initiative through this call for evidence and look forward to reading further details about the Action Plan on Online Fraud in the coming months.

Yours sincerely,



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