

Commission proposal on preventing and combating child sexual abuse: The Commission's engagement with stakeholders

Impact assessment (SWD(2022) 209, SWD(2022) 210(summary)) accompanying a Commission proposal for a Regulation of the European Parliament and of the Council on laying down rules to prevent and combat child sexual abuse, COM(2022) 209

This detailed appraisal of a Commission impact assessment builds on the [initial appraisal](#) prepared by the Ex-Ante Impact Assessment Unit of EPRS in December 2022. It was drawn up in response to a specific request by the European Parliament's Committee on Civil Liberties, Justice and Home Affairs (LIBE), and in accordance with the European Parliament's [Impact assessment handbook](#), adopted by the Conference of Committee Chairs on 12 September 2017.

The request concerns the European Commission's [proposal](#) for a Regulation of the European Parliament and of the Council on laying down rules to prevent and combat child sexual abuse (COM(2022) 209), submitted on 11 May 2022 and referred to LIBE. The LIBE committee asked EPRS on 16 October 2023 to prepare a 'briefing note, which should in particular aim at mapping out the companies and organisations, which were involved in the preparatory phase of the above-mentioned legislative proposal. Special attention should be paid to Thorn and its partners, in particular Palantir.'

The briefing provides a detailed analysis from a methodological point of view of Annex 2 (stakeholder consultation) of the European Commission's [impact assessment](#) accompanying the above-mentioned proposal. It does not attempt to deal with the substance of the proposal and is drafted for information purposes to assist the LIBE committee in its work. It does not represent an official position of the Parliament.

Summary

Drawn up in response to the specific request by the LIBE committee of 16 October 2023, this briefing first provides a succinct overview of the role and purpose of stakeholder consultation under the Commission's Better Regulation agenda (Chapter 1), to enhance the evidence base of a legislative proposal. It considers the different types of consultation the Commission carries out at different stages in the process to ensure it consults broadly and comprehensively, as set out in the [Better Regulation Guidelines](#) (BRG). Moreover, the briefing outlines the function of the interinstitutional [Transparency Register](#) in relation to stakeholder consultation.

Chapter 2 analyses in detail how these guidelines were applied in the specific case, starting with the feedback the Commission solicited on the inception impact assessment in December 2020 up until the adoption of the proposal on 11 May 2022. It appears that the Commission has sought feedback and input from a wide range of stakeholders, throughout the process, in compliance with transparency requirements set out in the Better Regulation Guidelines, interinstitutional agreements on [better law-making](#) (2016) and the [Transparency Register](#) (2021), and EU secondary law, in particular Commission decisions [2014/839/EU](#) and [2014/838/EU](#) regarding the publication of information on meetings held between Members of the Commission and Directors-General of the Commission, respectively, with organisations or self-employed individuals.

Chapter 3 provides for a mapping of the stakeholders that gave input to the Commission's consultation activities during the different stages of the preparation of the proposal. It is complemented by two annexes, the first providing a mapping grouped by stakeholder categories,



while the second annex covers meetings Commission members (the Commission President, Vice-Presidents and Commissioners), their cabinet members and Directors-General held with third parties in the context of the proposal in question.

Finally, based on publicly available sources, Chapter 4 examines the involvement of Thorn and Palantir in the preparation of this proposal. According to publicly available sources, Thorn indeed provided input to the consultations, which appears was not the case for Palantir.

1. Stakeholder consultation under the Commission's Better Regulation agenda

Engaging with stakeholders in the preparation of a policy initiative is an essential requirement under the Commission's [Better Regulation agenda](#). Stakeholder consultation increases the openness and transparency of the policymaking process and ensures that the Commission is aware of the views and concerns of those affected by the initiative, including public authorities, associations, civil society, and businesses of different sizes, as well as the scientific community and individuals. Ultimately, the involvement of different stakeholder groups not only improves the overall quality of the initiative, but also increases its credibility and contributes to its public acceptance.

In general, the Commission's policymaking is informed by broad and comprehensive stakeholder consultation, as required by the BRG and the associated toolbox ([Chapter 7](#)). For legislative initiatives underpinned by an impact assessment – as is the case with the proposed CSAM (child sexual abuse material) regulation ([COM\(2022\) 209](#)) the guidelines recommend to hold **open stakeholder consultations** targeting the broader public at different stages of the procedure.

- At the initial stage ('roadmap'), the Commission solicits feedback on the inception impact assessment via a 'call for evidence'.
- Still at an early stage, the Commission runs a questionnaire-based public consultation, which is usually open during a 12-week period.
- Finally, once a legislative proposal has been adopted by the College of Commissioners, another round of comments opens, typically for a period of eight weeks.¹ This feedback round is held in parallel with the period during which national parliaments have the opportunity to provide reasoned opinions on subsidiarity grounds.

The Commission's open stakeholder consultations are channelled via the central [Have your say portal](#). For the sake of transparency, feedback and contributions received remain accessible via that portal.

In addition to public consultation activities, the Commission also carries out **targeted stakeholder consultations**, which focus on specific groups of stakeholders and experts. Tools for the latter include, for instance, targeted online surveys, focus group meetings, workshops, and interviews.

Whether open or targeted, the Commission's interaction with stakeholders is subject to strict transparency standards. The Commission uses the following tools to inform the public about the involvement of stakeholders in the preparatory phase of an initiative accompanied by an impact assessment:

- A detailed summary report of all stakeholder activities (public and targeted) is annexed to the impact assessment ('synopsis report', Annex 2 of the IA).
- Feedback received in response to the call for evidence and the questionnaire-based open public consultation is accessible on the Have your say portal.
- Businesses, associations and civil society organisations that wish to participate in consultation activities should record their data in the interinstitutional [Transparency Register](#) (see tool #53 of the BRG).
- High-level meetings with stakeholders must be disclosed. This concerns, in particular, meetings with Commissioners, their cabinet staff and Directors-General of the Commission.² The webpages of the European Commission provide lists of these meetings.

The **Transparency Register** plays a key role with regard to the EU institutions' interaction with businesses, associations and civil society organisations. It is governed by an interinstitutional agreement³ and currently lists over 12 300 registered entities. Registrants must respect the code of conduct annexed to the interinstitutional agreement. The individual records provide information about the organisation, its goals/remit, areas of interest, the specific Commission initiatives to which it has contributed (via roadmaps or consultations), participation at the level of EU institutions (e.g. a European Parliament intergroup or a European Commission expert group), its membership and its funding. In addition, the register indicates if an organisation had high-level meetings with the Commission, and on which topic.

2. Stakeholder input to the CSAM file

The Commission's stakeholder consultation activities in relation to the [CSAM proposal](#) (COM(2022) 209) are summarised in the 'synopsis report' presented in Annex 2 of the [impact assessment](#) (SWD (2022) 209). The synopsis report stresses that the Commission has consulted as widely as possible, through open and targeted consultations.

The consultations had four main objectives:

- to identify current best practice, as well as challenges and gaps, and the relevant needs of all stakeholders;
- to identify ways forward that would best address those needs;
- to ensure that stakeholders (including citizens and those who would be directly affected by this initiative) can provide their views and input on the possible options for the way forward;
- and to improve the overall evidence base underpinning the initiative.

According to the synopsis report, the Commission services identified relevant stakeholders and consulted them throughout the drafting process. They sought views from a wide range of stakeholders: citizens; service providers; individual companies; professional and business associations; public authorities from Member States (including justice and interior ministry officials) and relevant non-EU countries; law enforcement representatives; legal practitioners (lawyers, prosecutors, judges); non-governmental organisations (NGOs); inter-governmental organisations (IGOs); EU institutions and agencies; and academia (IA, pp. 127-128).

Open consultations

The Commission sought to gather the views from all interested parties, starting with the publication of an inception impact assessment to get initial **feedback**. This consultation, open from 2 to 30 December 2020, yielded 41 replies from different groups of stakeholders, mainly NGOs (13) and companies and business organisations (11), but also business associations (2), public authorities (2), researchers (1) and EU citizens (2). The remaining 10 were submitted by other entities (including, for instance, UNICEF and the Global Partnership to End Violence against Children). The full text of each contribution is available under the corresponding [entry](#) on the Have your say portal.

Between 11 February and 15 April 2021, the Commission carried out a questionnaire-based **open public consultation**. As EPRS's [initial appraisal](#) (APIN) of the impact assessment already noted, this consultation lasted only nine weeks, instead of the mandatory 12 weeks envisaged by the Better Regulation Guidelines. The Commission argued that the consultation period had to be shortened so that its outcome could be used for the IA, without delaying the legislative proposal, which was (initially) planned for the second quarter of 2021 ([Commission Work Programme 2021](#)). The Commission held that it mitigated the potential effect of the reduced timeframe by disseminating the call for contributions widely, e.g. through social media channels and 'established networks of stakeholders', which included, inter alia, the [WePROTECT Global Alliance](#),⁴ public authorities, hotlines and academia (IA, pp. 163-164).

A total of 587⁵ responses were received: 78 % of them came from EU citizens, some 10 % from NGOs, nearly 4 % from international or national public authorities (e.g. law enforcement agencies, ministries, etc.), 3 % from private companies, 1 % from business or professional associations, and less than 1 % from academic and research institutions, and consumer organisations. The remainder came from other entities (e.g. bar associations and faith-based organisations). Almost half of respondents were from Germany (45 %) and 16 % from Ireland.

The synopsis report notes that 45 respondents submitted additional information (e.g. position papers). These respondents are listed on pp. 164-166 of the IA.

The synopsis report includes ample detail on the consultation results (IA, pp. 131-165) and also summarises how the results of the various consultations were taken into account in the impact assessment (IA, pp. 171-172). The EPRS 'Legislation in progress' briefing on [Combating child sexual abuse online](#) from June 2023 summarises the Commission's stakeholder consultation work.

'On the whole, the proposal has been welcomed by stakeholders, but the discussion is polarised, notably with a view to possible disruptions of E2E encryption and interference with data protection and privacy, not least owing to the compulsory approach. Some organisations strongly support it, while others express strong criticism, mainly out of concern that the privacy of communications in end-to-end (E2E) systems would be breached. Some also worry that the required user notifications might jeopardise ongoing investigations. Others also raise concerns about the potential administrative burden and compliance costs for SMEs, and ask for a targeted approach. Some providers favour a voluntary approach that would arguably enable current efforts and innovation. Many also ask for a clear transition period between the Interim Regulation and the new legislation to avoid legal gaps that might have a negative impact. For instance, during the 18 weeks between the entry into force of the European Electronic Communications Code (EECC) in December 2020 and the entry into effect of the temporary derogation from the e-Privacy Directive, there was a 58 % drop in files contained within EU reports to US National Center for Missing & Exploited Children's (NCMEC).

Some would like interpersonal communication services designed for professionals and professional accounts to be excluded from the scope of the proposal. Others argue that livestream CSAM has unjustifiably been excluded from this scope. This could lead to criminal material shifting from one service to another (a wave effect). Yet others argue that the proposal is not consistent with EU law, among other things because of the provisions authorising the general monitoring of content online.' (EPRS [briefing](#), p. 7)

The [initial appraisal](#) of the impact assessment added:

'Stakeholder interviews diverged, for example, on the mandatory detection of grooming, which forms part of the preferred option. In the public stakeholder consultation, it received little or no support from privacy rights organisations, service providers and individuals, while the level of support by public authorities and child rights NGOs was at 48 %, and 51 %, respectively (see IA, p. 82). The European Data Protection Supervisor (EDPS) and the European Data Protection Board (EDPB) in their [joint opinion](#) on the proposal raised serious concerns about the necessity and proportionality of the measures for the detection of unknown CSAM and grooming.' (EPRS [APIN](#), p. 10)

'Of note is the fact that service providers expressed little support for the imposition on them of a legal obligation to detect known CSAM (12.5 % of responses), new CSAM (6 %) and grooming (6 %). They flagged that, if there are any obligations, they should be formulated in terms of best reasonable efforts given the current state of technology, be in line with other EU legislation (e.g. e-Commerce Directive and the DSA), and not impose an excessive burden on SMEs (IA, p. 82).' (EPRS [APIN](#), p. 10)

To give a flavour of the discussion and the diverging views, the cited EPRS [briefing](#) (pp. 7-10) features a dedicated section with selected stakeholder positions.

Targeted consultations

The Commission complemented the open consultations with targeted stakeholder consultations, which encompassed questionnaire-based targeted surveys, a series of workshops, conferences, expert groups, and bilateral meetings.

Two **targeted surveys**, both based on questionnaires, were addressed to **law enforcement authorities (LEAs)** in all Member States. The first one ran from 4-19 March 2021 and sought to gather qualitative and quantitative information concerning the origin, quality and use of reports of child sexual abuse that online law enforcement authorities receive. It yielded replies from 16 Member States. The second targeted survey, open from 26 April 2021 to 10 May 2021, aimed to gather data on (i) the costs associated with reports of child sexual abuse online received by LEAs; (ii) how the quality of reports can be improved; and (iii) the impact of encryption on investigations. The IA does not indicate how many replies it received on the second survey.

In addition, the Commission conducted a series of **expert group meetings** with Member States, including the Council Presidency, and with a number of private sector service providers and civil society organisations.

Table 1 – Overview of expert group meetings organised by the Commission

Expert group meeting	Date	Target groups
Expert group on the implementation of Article 25 of Directive 2011/93/EU	Not indicated	Representatives of EU Member States, Europol, Interpol and the INHOPE hotlines
Expert workshop on current and future challenges in the fight against child sexual abuse	06/09/2020	Representatives from the EU Member States, Europol, Interpol, the US Department of Homeland Security and US Department of Justice, and the WeProtect Global Alliance
Meeting with civil society organisations on the upcoming legislation to fight child sexual abuse	19/02/2021	Close to 100 representatives of civil society organisations
Plenary meeting of the Victims' Rights Platform	23/02/2021	Over 40 participants, including members of the Victims' Rights Platform and Commission representatives responsible for the victim-related strategies adopted in the past months
Online meeting with privacy-focused civil society organisations on the upcoming legislation to fight child sexual abuse	26/02/2021	Six representatives of civil society organisations dealing with privacy and digital rights
Meeting with Expert group on the implementation of Article 25 of Directive 2011/93/EU the National Centre for Missing and Exploited Children (NCMEC)	04/03/2021	National Centre for Missing and Exploited Children (NCMEC)
Meeting with industry stakeholders on the long-term instrument on the fight against child sexual abuse	05/03/2021	Wide range of industry stakeholders, with a total of 50 participants attending from 25 companies and representative organisations
Meeting with Member State experts (experts from law enforcement, JHA counsellors)	08/03/2021	70 Member State representatives
Targeted consultation meeting with European Parliament Staff	10/03/2021	European Parliament Staff (APAs, advisors, etc.)
Network on prevention of child sexual abuse	12/03/2021	Network on prevention of child sexual abuse, composed of researchers, academics and key NGOs working in this field
Several technical meetings on end-to-end encryption and the fight against child sexual abuse	February to December 2020	Technical experts (outcome summarised in Annex 9 of the impact assessment)
Technical meeting on safety by design	21/10/2021	Industry and civil society stakeholders under the umbrella of the EU Internet Forum

Source: Author, based on IA, pp. 166-169.

Furthermore, Commission representatives participated in various **workshops and conferences** organised by third parties 'to provide information on the ongoing work and gather feedback from stakeholders' (IA, p. 169):

- Academy of European Law (ERA) seminars on Preventing Child Sexual Abuse (multiple dates);
- Meeting of the Committee of the Parties to the Council of Europe's 'Lanzarote' Convention on the protection of children against sexual exploitation and sexual abuse, 25 September 2020;
- Technology Coalition, 24 and 25 March 2021;
- RENEW webinar on children's rights in the digital world, 30 August 2021;
- Safer Internet Forum, Deep Dive on Child Sexual Abuse material, 7 October 2021;
- Ministerial videoconference on the prevention and investigation of child sexual abuse, 12 November 2021;
- Council of Europe Octopus conference, Workshop 6 – Automated detection of child sexual abuse materials, 17 November 2021;
- EU Internet Forum Ministerial, 8 December 2021.

The impact assessment is also transparent about **bilateral meetings** the Commission held with a wide range of stakeholders (IA, p. 169). These included meetings with service providers, among them individual companies and industry associations; public authorities from EU Member States and the UK, US and Australia; Europol; Members of the European Parliament; NGOs; and relevant ongoing EU-funded project consortia. Meetings subject to the transparency requirements (in particular those held with Members of the Commission, staff from their Cabinets and Commission Directors-General) are listed on dedicated webpages and included in the Transparency Register (attached to the records of the organisations concerned).

Finally, the impact assessment states that the Commission also received **letters and public statements from stakeholders** expressing their views on the commitments in the EU Strategy for a more effective fight against CSA, and more particularly on the [Interim Regulation](#). These letters are listed in the IA, pp. 169-171; most include links to the full texts of the letters and statements.

Table 2 provides a matrix of the various means of consultations used ('how'), the target groups ('who') and which sections of the impact assessment the consultation results fed into ('what'). Additional information can be found on pp. 128-129 of the IA.

Table 2: The Commission’s consultation strategy

		HOW				
		Target groups	Surveys		Meetings	Conferences
			Open public consultation (incl. inception IA)	Targeted surveys	Group	
WHO	Citizens	●				●
	Service providers	●		●	●	●
	Public authorities	●	●	●	●	●
	Practitioners	●		●	●	●
	NGOs	●		●	●	●
	IGOs	●		●	●	●
	EU institutions and agencies	●		●	●	●
	Academia	●				●
		Problem definition, options and impacts	Origin, quality and use of reports	Costs and quality of reports	Problem definition, options and impacts	
		WHAT				

Source: IA, p. 130.

Consultation after the adoption of the proposal

After the adoption of the legislative proposal by the College of Commissioners on 11 May 2022, the Commission launched a further consultation round. It was open from 13 May 2022 to 12 September 2022 and received 414 responses. These are available on the [Have your say portal](#). Obviously, the outcome of this consultation round is not included in the above-mentioned synopsis report as it followed the adoption of the legislative proposal. The contributions to this consultation round are not considered either in the annexes to this briefing, as they fall outside the scope of the request.

3. Mapping of stakeholders involved in the preparatory phase

Annex 1 to this briefing provides a mapping of all stakeholders (except EU and non-EU citizens and public authorities) that gave input to the Commission's consultation activities during the preparatory stage of the proposal. Distinguishing between categories of organisations and companies, it indicates whether they have provided feedback to the inception impact assessment (roadmap), to the open public consultation, or to both consultation rounds. Within both categories, submitted statements and position papers are singled out (marked R for roadmap and C for consultation). Furthermore, the table informs whether the Commission held bilateral meetings with the actor concerned specifically on CSAM.⁶ Finally, it indicates whether the entity is registered in the interinstitutional Transparency Register and, if so, under which (self-indicated) category and the form of entity under national law.

In the interest of transparency, organisations have been invited to provide the public with relevant information about themselves by registering in the EU's Transparency Register and subscribing to its Code of Conduct. However, the open public consultation questionnaires also include introductory questions related to the domain of activity, size, country, etc., which are published together with the contributions under the relevant tab in 'Have your say' (see, in particular, the [Excel table](#) with contributions).

Annex 1 draws on the following sources:

- The Commission's Have your say webpage (feedback to the inception IA and responses to the open public consultation)
- The interinstitutional Transparency Register
- The Commission's webpages listing the bilateral meetings of Commissioners, their Cabinet members and Directors-General
- Annex 2 of the impact assessment ('synopsis report')

Annex 2 to this briefing gives details about bilateral meetings Commissioners, their cabinet members and Directors-General held with third parties. Data are extracted from the dedicated webpages of the Commissioners concerned and the Transparency Register. Records are presented in alphabetical order.

4. Thorn and Palantir

Who are Thorn and Palantir?

[Thorn](#) is a US-based non-profit organisation that develops technology to defend children from sexual abuse and online exploitation. It was founded in 2012 by US actors Ashton Kutcher and Demi Moore. As to its legal status, according to the information provided on its website, Thorn is a registered [501\(c\)\(3\) organization](#).⁷ This is a specific US tax category for non-profit organisations under the US Internal Revenue Code (IRC), applicable inter alia to charitable organisations. 'Charity' is also the 'form of the entity' Thorn [indicated](#) in the interinstitutional Transparency Register.

Thorn maintains [partnerships](#) with the tech industry (including [Google, Intel and Palantir](#)) and NGOs (including the National Centre for Missing and Exploited Children (NCMEC), the International Association of Internet Hotlines (INHOPE) and the Global Partnership to End Violence Against Children (End Violence)). In 2018, Thorn launched its flagship software product '[Safer](#)', which is designed to detect child abuse through hash matching technology (matching hash values of images). The Commission's impact assessment makes reference to Safer as an example of an IT tool to identify, remove, and report child sexual abuse images (IA, p. 282).

The [complementary impact assessment study](#) that EPRS published in April 2023, at the request of the LIBE committee, notes that, for detection of new CSAM content, one of the most frequently used tools is the machine learning component of Safer.

This tool is made available to providers of information society services who can apply the tool to detect new material, based on machine learning. Thorn reports that if it sets the accuracy (sensitivity and specificity) of the tool to 99.9% (i.e. 'only' 0.1% of the cases is a false positive), the tool is able to identify 80% of the total CSAM in the dataset (when testing the tool). An independent expert assessment of these accuracy levels is difficult given the specific hash function (methodology) used in this benchmarking.' (EPRS [complementary IA](#), pp. 15-16)

[Palantir Technologies Inc.](#) is a US company providing software and services specialising in data mining and big data analytics. It was established in 2004, in the wake of the 9/11 terrorist attacks, one of its co-founders being US billionaire Peter Thiel, the founder of PayPal. Reportedly, Palantir software was built upon PayPal's fraud detection algorithms. While initially Palantir secured contracts with US military and intelligence agencies, the company later expanded its customer base to include the financial and pharmaceutical sectors.⁸ Palantir software is used in many areas, such as counterterrorism, cybersecurity, law enforcement, disease prevention, healthcare systems, countering child exploitation, to give but a few examples.⁹ The company is particularly known for two software platforms: Palantir [Gotham](#) and Palantir [Foundry](#).¹⁰ According to Palantir's own [blog](#), Palantir has, for a long time, partnered with organisations that work to end child sexual exploitation, such as the US [National Center for Missing and Exploiting Children](#), stating that its 'software supports these organizations' work to help find missing children, reduce child sexual exploitation, and prevent future victimization'.

Did Thorn and Palantir provide input to the Commission proposal on CSAM?

In addition to the bilateral meetings Thorn had with Commission representatives, which are listed in Annex 2, Thorn responded to the Commission's open public consultation with a position paper dated 14 April 2021.¹¹ In this contribution, it presented itself as an independent mission-centred non-profit organisation 'that sits at the unique nexus between child advocacy, law enforcement, and technology'. It further stated that it works 'globally to accelerate law enforcement's ability to identify child victims; to equip industry with the tools they need to detect, report, and remove child sexual abuse material from their platforms'. Thorn brought forward a number of recommendations:

- To ground solutions and detection methods in protecting children's rights and the privacy of child victims.
- To provide legal certainty for companies (in particular, service providers and internet platforms) to proactively detect child sexual abuse material.
- To allow for innovation and future-proofing (in this respect, Thorn considered itself to be 'at the forefront of those innovations', claiming that, together with its partners, it would constantly 'increase the efficiency and the speed of these child protection mechanisms without compromising the privacy of users').
- To promote transparency in the sense that tech companies should be transparent about the detection methods they deploy on their platforms.
- Finally, Thorn proposed some considerations for a possible European Centre to Combat Child Sexual Exploitation, one example being that it should cooperate with global law enforcement authorities, NGOs, and service providers.

In addition, in June 2022 Thorn [contributed](#) to the Commission's open consultation after the adoption of the proposal.

By contrast, Palantir did not have any bilateral meetings with the Commission, nor did it contribute to the Commission's open public consultation, according to the publicly available information. Moreover, this company is not registered in the interinstitutional Transparency Register.

Do other stakeholders make reference to Thorn or Palantir in their contributions?

A number of other stakeholders mention Thorn in their feedback to the [open public consultation](#) or, in rarer cases, on the [roadmap](#), whereas none of the stakeholders mention Palantir.

The technology company **Microsoft** stated in its feedback on the roadmap that it 'led the development of online child grooming-detection technology, which is also freely licensed to companies through a partnership with the NGO Thorn'. In its response to the open public consultation, Microsoft expressed its support for the idea of more partnerships with researchers and NGOs in its fight against child sexual abuse. In this context, it said that 'Microsoft supports the [Technology Coalition's Project Protect](#), which has established a multi-million-dollar Research and Innovation Fund, together with the NGOs Thorn and the Global Partnership to End Violence Against Children (End Violence).'

The technology company **Facebook** (now Meta) reported that in 2019, 'we launched [Stop Sextortion](#), a dedicated hub in our [Safety Center](#) developed by Thorn, a leading NGO in the fight against child sexual abuse, with resources for teens, caregivers and educators seeking support and information related to sextortion'.

In its response to the roadmap, the French technology company **Yubo/Twelve App**, which provides a live-streaming App, stated that it has 'developed a relationship with Thorn both utilising their technical tools such as the recent 'grooming tool', and have also helped them in developing their technical approach to live-streaming given the expertise within Yubo'. Moreover, Yubo has established partnerships with child safety associations and industry specialists and that it is 'supported by a Safety board comprised of some of the best international experts'; these experts include 'Travis Bright, Product Director of Thorn, one of the leading child safety organizations in the United States'.

The NGO **Internet Watch Foundation (IWF)** thought, with regard to a European Centre to Combat Child Sexual Exploitation, that 'it would seem sensible to bring together representatives from all of the relevant organisations suggested in this consultation to talk through the next steps'. Under the lead of the European Commissioner for Home Affairs and the Executive Director of Europol, this could 'involve other key organisations and networks from INHOPE, INSAFE, IWF, NCMEC, Thorn and other organisations working in the child trafficking, child rights and protection spheres' and 'require the co-operation and collaboration of the industry'.

The business association **Interactive Software Federation of Europe (ISFE)/European Games Developers Federation** stressed that safe online gameplay is a key priority for the industry and that it is convinced of the increasingly important role technology plays in tackling child sexual abuse. In this context, it cited Thorn ('i.e. Thorn deploys a grooming detection technique that helps identify potential instances of child online grooming for sexual purposes in historical, text-based conversations, making it a valuable and preventive tool to combat CSEA').

The **Match Group**, a provider of dating products and platforms (such as Tinder) gave information about the composition of its advisory council, which includes the CEO of Thorn ('The Match Group Advisory Council is composed of leading experts to help us further maximize the safety of our users and to support their campaigns and donations to make the world a safer place for all and focused on preventing sexual assault across our portfolio. MGAC members include John Clark, President and CEO of the National Center for Missing & Exploited Children (NCMEC); Judy Postmus, Founder, and director of the Center on Violence Against Women & Children at Rutgers University; Scott Berkowitz, founder and President of the Rape, Abuse & Incest National Network (RAINN); and Julia Cordua, CEO of Thorn').

ENDNOTES

- ¹ According to the BRG (toolbox, p. 452), the Commission prepares a summary report of this feedback round with the aim of feeding the collected views of different stakeholders on its final proposal (and impact assessment) into the legislative debate. This obligation is set out in point 33 of the IIA-BLM: 'The three Institutions will keep each other regularly informed throughout the legislative process about their work, about on-going negotiations among them and about any stakeholder feedback that they may receive, via appropriate procedures, including dialogue between them.'
- ² [Commission Decision 2014/839/EU, Euratom](#) of 25 November 2014 on the publication of information on meetings held between Members of the Commission and organisations or self-employed individuals; [Commission Decision 2014/838/EU, Euratom](#) of 25 November 2014 on the publication of information on meetings held between Directors-General of the Commission and organisations or self-employed individuals.
- ³ [Interinstitutional Agreement](#) of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register.
- ⁴ The WePROTECT Global Alliance is a global initiative to combat online child sexual abuse and exploitation. It results from a merger of the Global Alliance Against Child Sexual Abuse Online, which was launched on 5 December 2012 by the European Commission and US Department of Justice, and WePROTECT, established in 2014 by the UK Government by the then UK Prime Minister, David Cameron, and Baroness Joanna Shields as a global multi-stakeholder response to combating online child sexual abuse. The merger took place in May 2016 (see [timeline](#)). Today, the alliance is made up of several hundred [members](#) worldwide, among them over 100 governments (including all EU-27 governments), nine intergovernmental organisations (including the European Commission, Europol and Unicef), over 90 civil society organisations and nearly 70 private sector technology companies.
- ⁵ Although the IA (p. 131) refers to 603 respondents, the Have your say webpage says 587.
- ⁶ Bilateral meetings were taken into account if the subject matter indicated in the Transparency Register and Commission webpages relates directly to CSAM. However, in cases where child sexual abuse was one of several topics discussed, it is difficult to tell to what extent the topic was covered in the conversation. In cases where child sexual abuse is not explicitly mentioned, but the topic of the meeting could be related to it, the identification might not be 100 % relevant, so the information needs to be interpreted with caution.
- ⁷ [U.S. Internal Revenue Code \(IRC\), § 501\(3\)](#): 'Corporations, and any community chest, fund, or foundation, organized and operated exclusively for religious, charitable, scientific, testing for public safety, literary, or educational purposes, or to foster national or international amateur sports competition (but only if no part of its activities involve the provision of athletic facilities or equipment), or for the prevention of cruelty to children or animals, no part of the net earnings of which inures to the benefit of any private shareholder or individual, no substantial part of the activities of which is carrying on propaganda, or otherwise attempting, to influence legislation (except as otherwise provided in subsection (h)), and which does not participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office.'
- ⁸ K. Crawford, *The atlas of AI: power, politics, and the planetary costs of artificial intelligence*, Yale University Press, 2021, pp. 192-199; N. Lee, *Counterterrorism and cybersecurity: total information awareness*, 2nd ed., Springer 2015, pp. 157-158.
- ⁹ 'Washington's favourite tech firm', *Foreign policy*, winter 2019, p. 40.
- ¹⁰ V. Liermann, 'Overview machine learning and deep learning frameworks', in V. Liermann and C. Stegmann (eds), *The digital journey of banking and insurance, Vol. III: Data storage, data processing and data analysis*, Palgrave Macmillan, 2021, p. 216.
- ¹¹ The Commission makes the position papers and statements it received from stakeholders in attachment to their contributions to the open public consultation available to the public on the [file-specific webpage](#) on the Have your say portal, under 'Documents annexed to contributions'.

DISCLAIMER AND COPYRIGHT

This document is prepared for, and addressed to, the Members and staff of the European Parliament as background material to assist them in their parliamentary work. The content of the document is the sole responsibility of its author(s) and any opinions expressed herein should not be taken to represent an official position of the Parliament.

Reproduction and translation for non-commercial purposes are authorised, provided the source is acknowledged and the European Parliament is given prior notice and sent a copy.

© European Union, 2023.

eprs@ep.europa.eu (contact)

www.eprs.ep.parl.union.eu (intranet)

www.europarl.europa.eu/thinktank (internet)

<http://epthinktank.eu> (blog)

Annex 1: Stakeholder mapping

The following dataset provides a mapping of all stakeholders (except individual EU and non-EU citizens and public authorities) that gave input to the Commission's consultation activities during the preparatory stage of the proposal. It distinguishes between categories of organisations and companies, indicating whether they have provided feedback to the inception impact assessment (roadmap), to the open public consultation, or to both consultation initiatives. Within both, submitted statements and position papers are singled out (marked R for roadmap and C for consultation).

Furthermore, the table informs whether the Commission held bilateral meetings with the actor concerned specifically on CSAM (for details on these meetings see Annex 2). Finally, it indicates whether the entity is registered in the interinstitutional Transparency Register and, if so, under which (self-indicated) category and the form of entity under national law.

The table draws on the following sources:

- The Commission's Have your say webpage (feedback to inception IA and responses to the open public consultation)
- The interinstitutional Transparency Register
- Commission's webpages listing the bilateral meetings of Commissioners, their cabinet members and Director-General(s)
- Annex 2 of the impact assessment ('synopsis report')

Companies and businesses

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Statement/position paper	Bilateral meeting	Record	Category	Form of entity (as indicated in register)
AiBA (spin-off company under establishment and administration of NTNU Technology Transfer AS) (Norway)		●					
Apple Inc. (US)				●	●	Companies & groups	Corporation
BT Group (bt plc) (UK)		●	●C		●	Companies & groups	Public Limited Company
Cloudflare (US)	●	●			●	Companies & groups	Inc.
Discord Inc. (US)				●	●	Companies & groups	Corporation
Facebook (Meta) (Ireland)	●	●	●RC	●	●	Companies & groups	Limited company incorporated in the Republic of Ireland

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Statement/position paper	Bilateral meeting	Record	Category	Form of entity (as indicated in register)
Google (US)	●	●	●RC	●	●	Companies & groups	LLC
jurmatix Legal Intelligence UG (Germany)		●					
Redaktion Lan-Wan_telecom.de (Germany)		●					
Leaseweb Global B.V. (Netherlands)		●	●C				
The LEGO Group (Denmark)				●	●	Companies & groups	A/S
MaHop.Net (Germany)		●					
Mastercard Europe (Belgium)				●	●	Companies & groups	SA
Match Group (US)	●	●	●RC				
Mega Limited (New Zealand)		●			●	Companies & groups	Corporation
Microsoft Corporation (US)	●	●	●R	●	●	Companies & groups	Publicly Traded Corporation, incorporated in the State of Washington, US
Open-Xchange AG (OX) (Germany)	●	●	●RC		●	Companies & groups	Aktiengesellschaft incorporated in Germany
Proton AG (Switzerland)				●	●	Companies & groups	AG
Reddit Inc. (US)		●			●	Companies & groups	Corporation
Roblox Corporation (US)				●	●	Companies & groups	Publicly listed company
SafeToNet (UK)				●			
Secomba GmbH (Germany)		●	●C				
Snap Inc (US)	●		●RC	●	●	Companies & groups	Incorporated
TikTok Technology (Ireland)		●	●C	●	●	Companies & groups	Ltd Company
Twitter (Ireland)		●	●C	●	●	Companies & groups	Company Incorporated in the Republic of Ireland
Verizon Communications Inc. (US) and Verizon Media (US)	●	●			●	Companies & groups	Publicly traded corporation incorporated in Delaware USA

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Statement/ position paper	Bilateral meeting	Record	Category	Form of entity (as indicated in register)
Web-IQ B.V. (Netherlands)				●	●	Companies & groups	Limited Liability
Yahoo EMEA Ltd. (Ireland)	●	●	●C		●	Companies & groups	Limited liability company under Irish law
Yubo (France)	●		●R	●			
Zoom Video Communications, Inc. (US)				●	●	Companies & groups	Inc.

In addition, a [collective position paper](#) on the roadmap was submitted by the following domain name infrastructure companies and professionals: Blacknight Internet Solutions Ltd, Donuts Inc, Minds + Machines Group Limited, Netistrar Limited, Nominet UK, ShortDot S.A., Uni Naming & Registry Corp., Public Interest Registry, Realtime Register B.V.

In addition, a on the open public consultation was submitted by the following privacy focused tech companies: Boxcryptor, Cryptomator, mail.de, Mailfence, Praxonomy, Tresorit, and Tutanova.

Professional and business associations

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
ACT The App Association (Belgium)		●			●	Trade and business associations	AISBL
Computer & Communications Industry Association (CCIA) (Belgium)	●			●	●	Trade and business associations	Nonprofit membership organization
Council of European Professional Informatics Societies (CEPIS) (Belgium)				●	●	NGOs, platforms and networks and similar	ASBL
Digital Europe (Belgium)		●	●C	●	●	Trade and business associations	AISBL
DOT Europe (Belgium)		●	●C		●	Trade and business associations	AISBL

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
eco - Association of the Internet Industry (Germany)	●	●	●R		●	Trade and business associations	e.V.
EuroISPA (European Internet Services Providers Association) (Belgium)	●	●	●R		●	Trade and business associations	EEIG
European Internet Forum (EIF) (Belgium)				●	●	NGO, platforms and networks and similar	ASBL
European Telecommunications Network Operators' Association (ETNO) (Belgium)		●	●C		●	Trade and business associations	AISBL
Information Technology Industry Council (ITI) (US)		●	●C		●	Trade and business associations	non-profit industry association
The Internet Corporation for Assigned Names and Numbers (Belgium)				●	●	NGO, platforms and networks and similar	non-profit public-benefit entity
Internet Infrastructure Coalition (i2Coalition) (US)	●		●R		●	Trade and business associations	"none"
Internet Society (US)		●	●C		●	NGOs, platforms and networks and similar	Not-for-profit corporation
Sdružení pro internetový rozvoj (SPIR) (Czechia)		●			●	Trade and business associations	association
Video Games Europe (isfe.eu) (Interactive Software Federation of Europe) (Belgium)		●	●C		●	Trade and business associations	International Organisation with a Scientific and Pedagogical Purpose
Wirtschaftskammer Österreich (Austria)	●				●	Other organisations, public or mixed entities	Körperschaft öffentlichen Rechts

Consultancies

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
EU Strategy (Belgium)				●	●	Professional consultancies	SPRL
FGS Global (Europe) GmbH (Germany)				●	●	Professional consultancies	GmbH
Future Advocacy (UK)				●	●	Professional consultancies	Consultancy agency
Safer Together (UK)		●					

Children's rights and human rights NGOs

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
5Rights Foundation (UK)				●	●	NGOs, platforms and networks and similar	Charity
Ajudajudar (Portugal)		●					
Amicale du Nid (France)		●					
Associação de Mulheres Contra a Violência – AMCV (Portugal)		●	●C				
Associação Portuguesa de Apoio à Vítima (Portuguese Association for Victim Support) (Portugal)		●			●	NGOs, platforms and networks and similar	Instituição Particular de Solidariedade Social
Child Rescue Coalition (US)		●					
Collective Shout (Australia)		●					
Common Sense Media				●			

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
Dignidade - Associação para os Direitos das Mulheres e Crianças, Observatório de Crianças e direitos (Portugal)		●					
ECPAT International (Thailand) and several ECPAT members in the EU	●	●	●R	●	●	NGOs, platforms and networks and similar	Foundation
End Female Genital Mutilation (End FGM) - European Network (Belgium)		●	●C		●	NGOs, platforms and networks and similar	ASBL
Equality Now (UK)		●			●	NGOs, platforms, and networks and similar	Company Limited by Guarantee/Charity
Expertisebureau Online Kindermisbruik (EOKM) (Netherlands)	●	●	●R		●	NGOs, platforms, and networks and similar	Foundation
Federation of Catholic Family Associations in Europe (FAFCE) (Belgium)	●	●	●RC		●	NGOs, platforms and networks and similar	ONG
Garance (Belgium)		●			●	NGOs, platforms, and networks and similar	Association sans but lucratif
Global Partnership to End Violence against Children (US)	●	●					
"Hope For Children" CRC Policy Center (Cyprus)		●					
Hotline.ie (Irish Safer Internet Centre) (Ireland)	●	●	●R				
INHOPE, International Association of Internet Hotline (Netherlands)		●			●	NGOs, platforms and networks and similar	Association of Hotlines

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
International Center for Missing and Exploited Children (US)		●					
International Centre on Sexual Exploitation (UK)		●	●C				
International Justice Mission (Germany)		●					
International Justice Mission (Netherlands)		●	●C				
Internet Watch Foundation (UK)		●		●	●	NGOs, platforms and networks and similar	Charity
Kanner-Jugendtelefon (KJT) (Germany)		●					
Kindernothilfe e.V. (Germany)		●			●	NGOs, platforms and networks and similar	eingetragener Verein
Lasten perusoikeudet - Children's Fundamental Rights ry (Finland)		●					
Law and Technology Research Institute of Recife - IP.rec (Brazil)		●					
LPR-Trägergesellschaft für jugendschutz.net GmbH (Germany)		●			●	Other organisations, public or mixed entities	gemeinnützige GmbH
Missing Children Europe (Belgium)	●	●	●R		●	NGOs, platforms and networks and similar	ASBL
The National Center for Missing and Exploited Children (US)	●	●	●R	●	●	NGOs, platforms and networks and similar	non-profit organisation

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
National Society for the Prevention of Cruelty to Children (NSPCC) (UK)	●	●					
Nidos Jeugbescherming voor vluchtelingenkinderen (Netherlands)		●					
Organizatia Salvati Copiii (Romania)		●					
Platform for International Cooperation on Undocumented Migrants (PICUM) (Belgium)		●			●	NGOs, platforms and networks and similar	Non governmental organisation
Point de Contact (France)		●					
Praksis (Greece)		●					
Prostasia Foundation (US)		●			●	NGOs, platforms and networks and similar	charity
Pulse Foundation (Фондация "П.У.Л.С.") (Bulgaria)		●					
Reporters sans frontières / Reporters without Borders (France)		●			●	NGOs, platforms and networks and similar	Association Loi 1901
Respect Zone (France)		●	●C		●	NGOs, platforms and networks and similar	association loi de 1901 (France)
SafeLine (Greece)	●	●	●R				
Save the Children Denmark (Denmark)		●					
Save the Children Italia Onlus (Italy)		●					
Save the Children Spain (Spain)		●					
Simuka Africa Youth Association (Zimbabwe)		●					

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
The Smile of the Child (Greece)		●			●	NGOs, platforms and networks and similar	Non-Profit Association
Stichting Strijd Tegen Misbruik (Netherlands)				●	●	Other organisations, public or mixed entities	Stichting
Suojellaan Lapsia ry. / Skydda Barn rf./ Protect Children (Finland)		●					
Telefono Azzurro (Italy)	●	●					
Terre des Femmes - Menschenrechte für die Frau e.V. (Germany)		●					
Terre des Hommes Netherlands (Netherlands)	●	●	●RC				
Thorn (US)		●	●C	●	●	NGOs, platforms and networks and similar	charity
Together for Girls (US)				●	●	NGOs, platforms and networks and similar	US-based charitable non-profit organisation
Victim Support Europe (Belgium)	●	●	●RC	●	●	NGOs, platforms and networks and similar	AISBL
WeProtect Global Alliance (Netherlands)	●	●	●R	●	●	NGOs, platforms and networks and similar	Stichting
Wirbelwind Ingolstadt e.V. (Germany)	●		●R				
World Vision Brussels & EU Representation ivzw/aisbl (Belgium)				●	●	NGOs, platforms and networks and similar	Association Internationale sans but lucratif - aisbl

In addition, a collective position paper on the open public consultation was submitted by the following children's rights organisations: Terre des Hommes Netherlands, Het Centrum tegen Kinderhandel en Mensenhandel, International Justice Mission, and Defence for Children-ECPAT Netherlands.

Privacy-focused civil society organisations

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
Chaos Computer Club Cologne e.V. (Germany)		●			●	NGOs, platforms and networks and similar	eingetragener Verein
Defend Digital Me (UK)		●	●C				
Electronic Frontier Foundation (EFF) (US)		●	●C		●	NGOs, platforms and networks and similar	donor-funded US 501(c)(3) nonprofit organization
epicenter.works - for digital rights (Plattform Grundrechtspolitik) (Austria)		●			●	NGOs, platforms and networks and similar	Verein
European Digital Rights (EDRI) (Belgium)		●	●C	●	●	NGOs, platforms and networks and similar	AISBL
Global Encryption Coalition (US)		●	●C				
Global Encryption Coalition Steering Committee (Internet Society; Global Partners Digital; Center for Democracy and Technology) (US)		●					

Academic/research institutions

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
Applied Research and Communications Fund (Bulgaria)		●					
Charité – Universitätsmedizin Berlin (Institute of Sexology and Sexual Medicine) (Germany)		●					
Moore Center for the Prevention of Child Sexual Abuse, Johns Hopkins Bloomberg School of Public Health (US)	●						
Norwegian University of Science and Technology, Department of Information Security and Communication Technology (Norway)		●			●	Academic institutions	Public Body
University of Ljubljana, Faculty of Education (Slovenia)		●	●C		●	Academic institutions	Public entity (University)
University of Hull (UK)		●	●C				

Others

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
Austrian Bar Association / Österreichischer Rechtsanwaltskammertag (Austria)		●	●C		●	Trade unions and professional associations	Körperschaft öffentlichen Rechts
Bundesverband der Freien Berufe – BFB (Germany)		●	●C		●	Trade unions and professional associations	e.V.

Name and country	Consultation				Transparency Register		
	Roadmap	Open public consultation	Position paper	Bilateral meeting	Record	Category	Form of entity
Commission of the Episcopates of the European Union (COMECE), (Belgium)		●	●C		●	Organisations representing churches and religious communities	A.I.S.B.L.
General Council of the Bar of England and Wales, Brussels Office (United Kingdom)	●				●	Trade unions and professional associations	Independent Regulator, Professional representation
German Bar Association (Deutscher Anwaltverein – DAV) (Germany)		●			●	Trade unions and professional associations	eingetragener Verein
Giordano Bruno Stiftung (Germany)		●					
Global Institute for Structure relevance, Anonymity and Decentralisation i.G. (GISAD) (Germany)		●	●C		●	Other organisations, public or mixed entities	Institut i.G.
www.kinderschuetzen-betroffenestuetzen.de (Germany)	●						
Stiftung Digitale Chancen (Germany)		●		●	●	NGOs, platforms and networks and similar	Stiftung bürgerlichen Rechts
Wikimedia Foundation (US)		●	●C		●	NGOs, platforms and networks and similar	Non-profit organisation

Annex 2: Meetings with Members of the Commission/ Cabinet staff

This dataset focuses on the period between the launch of the inception IA on 2 December 2020 and the adoption of the proposal on 11 May 2023. Meetings before and after this period are considered, but their date is marked in blue.

Bilateral meetings were taken into account if the subject matter indicated in the Transparency Register and on the relevant Commission webpages relates directly to CSAM. However, in cases where child sexual abuse was one of several topics discussed, it is difficult to tell to what extent the topic was covered in the conversation. In cases where child sexual abuse is not explicitly mentioned, but the topic of the meeting could be related to it, the identification might not be 100% relevant, so that the information needs to be interpreted with caution.

5Rights Foundation				
Cabinet Breton	Internal Market	24/02/2022	Videoconference	Better Internet for Kids ¹
Cabinet Johansson	Home Affairs	17/06/2021	Virtual meeting	Preventing CSEA by design & incentivizing privacy-protecting innovation
Cabinet Jourová	Values and Transparency	24/03/2021	Videoconference	Children and digital ²
Cabinet Vestager	Europe Fit for Digital Age	02/03/2021	Brussels (online)	Children's rights in the digital space – Digital decade, Digital Services Act ³
Cabinet Šuica	Democracy and Demography	01/02/2021	Brussels	Children's Rights ⁴

Apple				
Cabinet Johansson	Home Affairs	07/09/2021	Brussels	Discussion on the recent announcements by Apple of new child safety features ⁵
Cabinet Reynders	Justice	07/09/2021	Brussels	Privacy shield, Data protection, Encryption ⁶
Cabinet Johansson	Home Affairs	18/06/2021	Virtual	Discussion on the latest legislative developments in the fight against child sexual abuse online
Cabinet Vestager	Europe Fit for Digital Age	24/03/2021	Online	Data Privacy ⁷

Common Sense Media				
Commissioner Breton and Cabinet	Internal Market	10/05/2022	Brussels	Fighting illegal content and disinformation to protect children ⁸

Computer & Communications Industry Association (CCIA)				
Cabinet Vestager	Europe Fit for Digital Age	02/06/2022	Brussels	Telecom infrastructure fee, CSAM proposal, Digital Services Act

The Council of European Professional Informatics Societies (CEPIS)				
Cabinet Johansson	Home Affairs	10/06/2022	Brussels	EU efforts to prevent and tackle child sexual abuse

Discord Inc.				
Cabinet Šuica	Democracy and Demography	07/02/2023	Brussels	EU Better Internet for Kids Strategy Online safety for children ⁹
Cabinet Šuica	Democracy and Demography	28/06/2022	Brussels	Discord's business model, work on child safety, and efforts in content moderation; EU Strategy for a BIK; The new law on the fight against online child sexual abuse material
Cabinet Breton	Internal Market	28/06/2022	Brussels	Presentation of the company's approach to content moderation and child protection ¹⁰

ECPAT Deutschland e.V.				
Commissioner Johansson and Cabinet	Home Affairs	20/10/2022	Berlin	European Commission proposal to fight child sexual abuse online

ECPAT Sverige				
Commissioner Johansson	Home Affairs	08/04/2021	Stockholm	Child sexual abuse

EU Strategy				
Cabinet Vestager	Europe Fit for Digital Age	13/05/2022	Online	CSAM, Better Internet for Kids [meeting held together with Twelve App (Yubo)]

European Digital Rights (EDRi)				
Cabinet Vestager	Europe Fit for Digital Age	25/05/2020	Brussels	Fundamental rights and digital policies
Commissioner Breton and Cabinet	Internal Market	30/04/2020	Videoconference	Fundamental rights and digital policies

European Internet Forum				
Cabinet Jourová	Values and Transparency	30/11/2021	VC	Tackling harmful content online ¹¹

FGS Global (Europe) GmbH				
Cabinet Vestager	Europe Fit for Digital Age	30/09/2021	Brussels	Use of Digital Services Act and other EU policies to tackle online child sexual abuse [this meeting was held together with Thorn]

Future Advocacy				
Commissioner Johansson and Cabinet	Home Affairs	16/01/2023	Brussels	CSA [according to transparency website of the Commissioner, this meeting was held together with Together for Girls]

Google				
Commissioner Johansson and Cabinet	Home Affairs	22/11/2022	VTC	Exchange of views on CSA
Cabinet Johansson	Home Affairs	22/11/2022	VTC	Meeting with Mr Kent Walker, on CSA proposal, the EU Internet forum on 7/12, the implementation of the TCO and digital security more broadly
Cabinet Johansson	Home Affairs	08/02/2022	Dublin, Ireland	Visit to the Google Safety Engineering Centre (GSEC) to understand Google's approach to content moderation including tackling child sexual abuse online
Commissioner Johansson and Cabinet	Home Affairs	10/11/2021	Brussels	Upcoming CSAM legislation
Commissioner Johansson and Cabinet	Home Affairs	22/03/2021	VTC	Upcoming legislation on child sexual abuse
Cabinet Johansson	Home Affairs	18/11/2020	VTC	Google's latest efforts in the area of content moderation, particularly when it comes to violent extremist content and child abuse material and also touch base on the upcoming Digital Services Act.

Google				
Cabinet Johansson	Home Affairs	04/02/2020	Brussels	EU internal security: cooperation with the industry in the fight against terrorism and child abuse online

The Internet Corporation for Assigned Names and Numbers				
Commissioner Johansson and Cabinet	Home Affairs	17/03/2022	VTC	Exchange of views on CSA file

Internet Watch Foundation				
Commissioner Johansson and Cabinet	Home Affairs	02/06/2022	Brussels	The participant's and the EU efforts to prevent and tackle child sexual abuse
Commissioner Johansson and Cabinet	Home Affairs	01/10/2020	VTC	Tackling child sexual abuse online

The LEGO Group				
Commissioner Šuica	Democracy and Demography	25/04/2023	Brussels	The implementation of the EU Strategy on the rights of the child ¹²
Cabinet Vestager	Europe Fit for Digital Age	11/05/2022	Brussels	CSAM, Digital Decade, Artificial Intelligence Act, Children's wellbeing, BIK+
Cabinet Šuica	Democracy and Demography	13/04/2021	Online	Meeting on Lego's contribution to the implementation of the EU Strategy on the rights of the Child ¹³

Mastercard Europe				
Commissioner Schinas and Cabinet	Promoting the European Way of Life	21/03/2023	Brussels	Ukraine, cyber-resilience and skills, combatting child sexual abuse online
Cabinet Breton	Internal Market	10/05/2021	Videoconference	Company policy for the Control of illicit pornography online

Meta Platforms Ireland Limited and its various subsidiaries (Facebook)				
Cabinet Breton	Internal Market	27/06/2023	Brussels	Minor protection ¹⁴
Cabinet Šuica	Democracy and Demography	07/06/2023	Brussels	Online youth protection ¹⁵
Cabinet Breton	Internal Market	08/06/2022	Videoconference	Content moderation ¹⁶
Commissioner Johansson and Cabinet	Home Affairs	01/06/2022	Brussels (Egmont Palace)	The participant's and the EU efforts to prevent and tackle child sexual abuse
Commissioner Breton and Cabinet	Internal Market	19/05/2022	Brussels	Content moderation and compliance with digital regulations ¹⁷
Cabinet Vestager	Europe Fit for Digital Age	27/04/2022	online	CSAM Regulation, end-to-end encryption
Cabinet Jourová	Values and Transparency	18/05/2021	Videoconference	Fight against child sexual abuse
Commissioner Johansson and Cabinet	Home Affairs	17/05/2021	VTC	A call between Commissioner Johansson and Vice President for Global Affairs and Communications at Facebook Nick Clegg took place to discuss Facebook's current practices and approach to security and safety ¹⁸
Cabinet Johansson	Home Affairs	03/06/2020	Brussels	Representatives of Facebook presented the technical coalition companies' efforts to tackle child sexual abuse online
Cabinet Johansson	Home Affairs	08/04/2020	Brussels	1. Introduction to EU affairs at Facebook and Facebook policy priorities. 2. Update on FB measures against the spread of COVID 19. 3. Terrorist content online and child sexual exploitation issues.

Microsoft				
Commissioner Johansson	Home Affairs	03/10/2022	Brussels	Meeting with Mr Brad Smith, CEO of Microsoft. Topics discussed - CSA and other digital topics from Commissioner Johansson portfolio
Commissioner Johansson and Cabinet	Home Affairs	03/10/2022	Brussels	Exchange of views on CSA
Cabinet Johansson	Home Affairs	02/06/2022	Brussels	The participant's and the EU efforts to prevent and tackle child sexual abuse
Cabinet von der Leyen	President	21/01/2021	Videoconference	Detection & reporting of child sexual abuse online and other illegal content (e.g. terrorist content); differences between traditional & cloud-based communications services; Digital Services Act.
Commissioner Johansson and Cabinet	Home Affairs	20/01/2020	Brussels	EU internal security: challenges ahead and law enforcement cooperation; perspectives from the industry ¹⁹

The National Center for Missing and Exploited Children				
Commissioner Johansson and Cabinet	Home Affairs	01/06/2022	Brussels (Egmont Palace)	The participant's and the EU efforts to prevent and tackle child sexual abuse
Commissioner Johansson and Cabinet	Home Affairs	10/02/2020	Brussels	The fight against child sexual abuse: exchange of information and encryption

Proton				
Cabinet Johansson	Home Affairs	08/12/2022	EC	CSAM

Roblox Corporation				
Cabinet Breton	Internal Market	27/09/2022	Videoconference	Better Internet for Kids strategy ²⁰
Cabinet Johansson	Home Affairs	09/06/2022	Brussels	The participant's and the EU efforts to prevent and tackle child sexual abuse

SafeToNet (STN)				
Cabinet von der Leyen	President	25/11/2020	Videoconference	Protection of children and fight against child sexual abuse. Role of the tech industry in protecting children online.
Snap Inc. (Snapchat)				
Cabinet Johansson	Home Affairs	08/06/2022	Brussels	The participant's and the EU efforts to prevent and tackle child sexual abuse
Stichting Strijd Tegen Misbruik				
Commissioner Johansson and Cabinet	Home Affairs	10/10/2022	Brussels	Exchange of views on CSA
Stiftung Digitale Chancen				
Commissioner Johansson and Cabinet	Home Affairs	20/10/2022	Berlin	European Commission proposal to fight child sexual abuse online [meeting held together with ECPAT Deutschland e.V.]
Thorn				
Commissioner Johansson and Cabinet	Home Affairs	20/03/2023	Brussels	Efforts to tackle Child Sexual Abuse
Cabinet Johansson	Home Affairs	08/06/2022	Brussels	The participant's and the EU efforts to prevent and tackle child sexual abuse
Cabinet Schinas	Promoting the European Way of Life	29/03/2022	Online	Child sexual abuse
Cabinet Breton	Internal Market	18/10/2021	Videoconference	Fighting Child sexual abuse online
Cabinet Vestager	Europe Fit for Digital Age	30/09/2021	Brussels	Use of Digital Services Act and other EU policies to tackle online child sexual abuse [meeting held together with FGS Global (Europe)]
Cabinet von der Leyen	President	10/02/2021	Videoconference via Webex	Protection of children against online abuse
Ursula von der Leyen	President	13/11/2020	Videoconference	Videoconference with Chairman of WePROTECT Global Alliance

Thorn				
				and Co-founder of Thorn (Topic: Fight against child sexual abuse)

TikTok				
Commissioner Johansson	Home Affairs	10/01/2023	CAB Johansson meeting room	CSA, TCO and radicalization online
Commissioner Schinas and Cabinet	Promoting the European Way of Life	23/05/2022	Davos	Current control of online content with view to preventing radicalisation & child sexual abuse
Commissioner Johansson and Cabinet	Home Affairs	26/10/2021	VTC	Discussion about TikTok's measures to prevent and counter the dissemination of Child Sexual Abuse material

Together for Girls				
Commissioner Johansson and Cabinet	Home Affairs	16/01/2023	Brussels, CAB Johansson	CSA [meeting held together with Future Advocacy]
Commissioner Johansson and Cabinet	Home Affairs	01/06/2022	Brussels (Egmont Palace)	The participant's and the EU efforts to prevent and tackle child sexual abuse

Twitter				
Commissioner Johansson and Cabinet	Home Affairs	07/02/2022	Dublin, Ireland	Discussion on the EU efforts and company's approaches to tackle child sexual abuse
Commissioner Johansson and Cabinet	Home Affairs	29/05/2020	Brussels	The impact of COVID-19 on hate speech, child abuse and terrorist content online

Victim Support Europe				
Director-General	DG HOME	30/11/2021	Brussels	Introductory meeting with the newly appointed president of VSE, Ms Geraldine Hanna. Issues of victim protection, in particular also planned initiatives in the field of child sexual abuse and trafficking in human beings were discussed.

Web-IQ B.V.				
Cabinet Johansson	Home Affairs	24/11/2022	Brussels	Child sexual abuse online

WeProtect Global Alliance				
President von der Leyen	President	13/11/2020	Videoconference	Videoconference with Chairman of WePROTECT Global Alliance and Co-founder of Thorn (Topic: Fight against child sexual abuse)

World Vision Brussels & EU Representation ivzw/aisbl				
Cabinet Šuica	Democracy and Demography	27/06/2022	Brussels	The implementation of the EU Strategy on the rights of the child. The Youth Action Plan and the implementation of meaningful child participation frameworks outside of the EU. Child Sexual Abuse and guaranteeing children's safety online

Yubo (Twelve App)				
Cabinet Vestager	Europe Fit for Digital Age	13/05/2022	online	CSAM, Better Internet for Kids [meeting held together with EU Strategy]
Cabinet Vestager	Europe Fit for Digital Age	25/05/2021	online	Presentation of the company and its application

Zoom				
Cabinet Johansson	Home Affairs	01/07/2022	VTC	EU Efforts to prevent and tackle child sexual abuse

Source: Interinstitutional Transparency Register and webpages of Members of the European Commission

NOTES

- ¹ The [Better Internet for Kids \(BIK\) Strategy](#) is an initiative of DG CNECT. The new Strategy (BIK+) was adopted on 11 May 2022, together with DG HOME's Proposal for a CSA Regulation.
- ² It is not clear whether CSA was part of the discussions.
- ³ Idem.
- ⁴ Idem.
- ⁵ Idem.
- ⁶ Idem. This discussion could have covered aspects of data protection and privacy implications as well as the detection of CSAM in end to end encrypted communications.
- ⁷ Idem.
- ⁸ It is not clear whether CSA was part of the discussions.
- ⁹ It is not clear whether CSA was part of the discussions (see endnote 1).
- ¹⁰ It is not clear whether CSA was part of the discussions.
- ¹¹ Idem. The European Internet Forum (launched by the EC in 2015) focuses on addressing the misuse of the internet for terrorist purposes. Enhancing the fight against child sexual abuse online was added to its area of activities in 2019.
- ¹² It is not clear whether CSA was part of the discussions. However, the [EU Strategy on the rights of the child](#) is relevant as it covers all child rights, including CSA.
- ¹³ Idem.
- ¹⁴ It is not clear whether CSA was part of the discussions. However, Facebook/Meta is one of the companies which perform voluntary detection in their services to detect, report and remove child sexual abuse material (CSAM), therefore the CSA proposal for could have been part of the discussion.
- ¹⁵ Idem.
- ¹⁶ Idem.
- ¹⁷ Idem.
- ¹⁸ Idem.
- ¹⁹ It is not clear whether CSA was part of the discussions. However, the fight against cybercrime, including child sexual abuse online, falls under the scope of the EU internal security rules. It is possible that the discussion took place as part of the preparatory work for the EU Strategy for a more effective fight against CSA, which was adopted on 24 July 2020).
- ²⁰ It is not clear whether CSA was part of the discussions (see endnote 1).