Thorn is encouraged by and commends the European Commission’s proposal for a Regulation to lay down the rules that will help companies and their platforms prevent and fight child sexual abuse online. This proposal is a critical step toward better protection of children worldwide.

As a nonprofit organization focused on developing new technologies to defend every child from online sexual abuse, Thorn is ready and able to share our experience and technical expertise to further assist the efforts aimed at preventing and combating child sexual abuse online with all relevant and key stakeholders.

The dissemination of child sexual abuse material (CSAM) online has dramatically increased in recent years and continues to rise. Many digital stakeholders already engage in significant voluntary mitigation efforts – however, the lack of legal clarity has presented a key hurdle to progress in the global fight against the viral dissemination of CSAM across the internet.

Thorn appreciates the **legal certainty** that the new proposal will generate for every service provider willing to protect children on the internet. As outlined in article 4 of the proposed regulation, the focus on preventive risk mitigation measures endorses tech companies’ proactiveness. Explicit references to the importance of voluntary action in this field could empower more tech companies to deploy innovative tools to ensure the safety and privacy of children online.

At Thorn, we know that collective action is the only way to stop the spread of CSAM online. It will take collaboration between citizens, institutions, policymakers, tech companies, and nonprofit organizations alike. We also know that many tech companies are already taking important steps to counter the rise of CSAM on their platforms. The proposal will further drive companies in the right direction by prioritizing prevention and safety by design. By entrusting tech companies to conduct risk assessments, the regulation will provide greater transparency on the actions undertaken to combat the dissemination of CSAM online and will foster meaningful action.

Yet, voluntary actions must be paired with a clear legal structure that incorporates appropriate checks and balances. The Commission’s introduction of the “detection order mechanism” signifies a shift to a results-oriented approach. It urges digital stakeholders to fulfill their responsibilities and is accompanied by necessary legal safeguards.

Thorn also supports the proposed establishment of an **EU Centre**, which will serve as a vital pillar of the fight against CSAM. Similar centers already exist in various jurisdictions and have demonstrated their efficiency in centralizing detected materials. These centers proactively liaise with enforcement authorities and provide necessary assistance and support to victims. Centralizing and safeguarding the creation and maintenance of CSAM indicators, such as hashes, in one European institution marks a big step forward. This centralization will be critical to avoid creating data silos, which would make it more difficult to protect children. As a developer of technology, Thorn welcomes the capacity of the EU Centre to act as a continental research hub, and we look forward to potential collaboration in this space. However, bearing such paramount yet sensitive responsibilities will require appropriate financial, technical, and
physical resources paired with strong privacy and security safeguards. In order to strengthen the global fight to eradicate CSAM, the cooperation between the EU Centre and the existing child protection ecosystem needs to be laid out in more detail.

At Thorn, we consider the detection of CSAM online as an irreplaceable part of the global fight to protect children. Yet, it constitutes only one part of what is needed. We welcome all the necessary provisions of the proposal aimed at ensuring the removal of CSAM and fostering victim support.

Thorn is committed to doing our part to give every child the chance to simply be a kid. When we work together and implement the measures proposed by the European Commission, we can change the future of the internet and make it safer for children, now and for generations to come.