



Commissioner Ylva Johansson

MISSION TO DUBLIN, IRELAND

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SCENE SETTER

You will visit Dublin where you will meet [REDACTED] and other Internet companies and discuss how to more effectively prevent and **combat child sexual abuse online**. You will also visit the **Google's Safety Engineering Centre**. These efforts are a continuation of your Mission to Silicon Valley that took place between 27-28 January. The aim is to discuss collaboration with companies in view of the forthcoming proposal for a regulation on preventing and combating child sexual abuse.

[REDACTED]
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Contact(s) – briefing coordination: Xxx (CAB), tel.:

Contact(s) – briefing contribution: [REDACTED]

TOPICS

Meeting with Internet companies

1. Main messages to [REDACTED] and Google's Safety Engineering Centre
2. [REDACTED]
3. Visit to Google's Safety Engineering Centre

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

1- Key messages for meetings with [REDACTED] and visit to Google's Safety Engineering Centre

- Highlight the importance of protecting children on the internet.
- Convey an overview of the European Commission's efforts to fight CSA, namely the new proposal that is expected to be presented at the end of March and the creation of a new EU Centre to prevent and combat child sexual abuse;
- Note that the legislative proposal is an opportunity to make a significant, long-lasting positive change in the fight against CSA in the EU (and globally, given the cross-border nature of the crime).
- Outline the main elements planned:
 - enabling companies to do their part by **mandating them to detect, report and remove** child sexual abuse online,
 - establishing an **EU centre to prevent and combat child sexual abuse**: This EU Centre will provide reliable information on what is illegal in the EU and on available tools to detect CSA online, to facilitate the work of companies in detection, reporting and removal of CSA online. It will also receive the reports from companies, analyse them and provide them to the competent national law enforcement authorities and Europol. In addition, the Centre will also act as a **hub of expertise** for all aspects of **prevention and victim support**, supporting Member States, and cooperate with similar Centres around the globe;
 - establishing **safety by design obligations** without hampering innovation.
- Reiterate the importance of companies' role in preventing and combating child sexual abuse,
- Acknowledge the good work they are already doing, also through the Tech Coalition, and call for their continued commitment and increased efforts to fight these crimes.
- **Safety by design** is key: there should be a regular check on what more could be done to incorporate features in products that safeguard children in the online space and prevent risky situations, before the products are put in the market. The well-being of children should be a key concern from the initial design stage of any product.
- Looking ahead, **encryption** remains a key issue. We need to make sure that detection, removal and reporting of child sexual abuse is possible in an effective manner even if end-to-end encryption is put in place.

3- Site visit- Google's Safety Engineering Centre

Scene setter

Google and YouTube are investing in transparency and building up tools to protect privacy and security. They plan to achieve this through Safety Engineering Centres focused on tackling key issues. The first Centre opened in Munich and targeted building tools to protect privacy and security. A second centre was opened in Dublin in 2021 looking at ways to tackle illegal and harmful content online, and plans are in the pipeline for a third centre to launch in Malaga in 2022 focused on cybersecurity. The aim of these centres is to bring together the best possible technical expertise and share the work with policymakers, researchers and regulators.

Main objective

- Gain insight into the initiatives that Google's Safety Engineering Centre is taking forward to combat and prevent child sexual abuse.
- Encourage further collaborative efforts, in particular in the context of the future EU Centre for combating and preventing child sexual abuse.

Line to take

- Reiterate the Commission's commitment to combat child sexual abuse and highlight the important role that companies have to make sure that children are kept safe online.
- Welcome Google's efforts to create a Safety Engineering Centre targeting illegal content online. Combating child sexual abuse requires a comprehensive and transparent response that brings to the table all the key stakeholders. Highlight the Commission's willingness to continue collaborating closely with Google.
- Inform of the Commission's efforts in this area, in particular the new proposal that is expected to be presented at the end of March this year, and the creation of the EU Centre to prevent and combat child sexual abuse. Note that this is an opportunity to bring about significant and long-lasting positive changes both in the EU and globally.

6- CSA legislation, including possible centre

Line to take

- Protecting children and countering child sexual abuse online is a top priority for the Commission. That is why the Commission presented the **EU Strategy for a more effective fight against child sexual abuse**.
- Putting in place a strong legal framework will **facilitate a coordinated approach across the many actors involved** with safeguarding and supporting children.

Upcoming legislation

- In line with the commitment undertaken in the **EU Strategy for a more effective fight against child sexual abuse**, the Commission is preparing a proposal for a Regulation on preventing and combatting child sexual abuse. We hope to adopt the proposal in March. Negotiations will begin during the French Presidency.
- Enough harm has been and continues to be inflicted on vulnerable children, and we must be properly equipped with the laws, policies, and resources needed to address this in a targeted manner.
- In line with this objective the proposal's measures relating to detection, reporting and removal of illegal content will be technology neutral. This also reflects the reality where currently law enforcement is unable to perform duties online that they are legally mandated to perform offline.
- This legislative proposal will seek to build on the progress achieved by the recently adopted Interim Regulation regarding voluntary measures to detect child sexual abuse material online. This will likely include **requiring** relevant companies to **detect and report** known child sexual abuse material to public authorities.
- This proposal is a key priority for the Commission. It is an opportunity to make a significant, long-lasting positive change in the fight against child sexual abuse in the EU (and globally, given the cross-border nature of the crime). It has the potential to be a game changer by notably 1) ensuring that companies do their part by **mandating them to detect, report and remove** child sexual abuse online, and 2) establishing an **EU centre to prevent and combat child sexual abuse**.
- The detection and reporting obligation will level the playing field, provide legal certainty to the companies and establish the necessary safeguards.

- *And the Digital Service Act (DSA), on which the trilogues will start in the first half of 2022, also introduces a series of **measures to reduce the prevalence of illegal content online.***

The EU Centre

- The upcoming proposal will also pave the way for establishing the **EU Centre to prevent and combat child sexual abuse**, to facilitate the work of:
 - companies in detection, reporting and removal of CSA online;
 - law enforcement in following up with the reports from companies;
 - Member States in prevention and assistance to victims
 - partners outside of the EU, given the global nature of these crimes, working closely with similar centres around the world (e.g. US, Australia and Canada).
- The centre could support detection, by maintaining a **database** of CSA indicators (e.g. hashes) that would reliably enable the detection of what is defined as CSA **according to EU rules**. It would facilitate access to reliable tools for companies to use. And, most importantly, it would receive and swiftly analyse and allocate reports of CSA – a service for which we currently have to rely on the United States.
- The centre would also act as a hub of expertise to support Member States on **prevention and victim support**.
- The centre will be a key component of the legislation, ensuring transparency and accountability and being an essential safeguard of the process to detect, report and remove child sexual abuse online.
- It could be a counterpart for similar entities around the world, boosting operation and sharing of experience and best practices globally.

Safety by design to safeguard children online

- The EU Strategy further highlights the importance of **industry** taking responsibility for the protection of children in their products. I fully share your approach of '**safety by design**', in particular when it comes to online services that may be used by children.

Other initiatives

- The **EU Internet Forum** is an important initiative which brings together industry and ministers of interior of all Member States to coordinate action in this area. One key example is the expert process with industry, academia, public authorities and civil society organisations, to identify technical solutions that would allow companies to detect CSA in end-to-end encrypted electronic communications whilst still safeguarding fundamental rights. This is a process that still requires further exploration, and it remains a very sensitive issue.
- We are setting up a **prevention network** composed of experts and practitioners, which will have the Centre as its hub. We want experts to exchange what is working well, to learn from one another, and to all improve jointly when it comes to preventing these crimes.

Defensives

Why has the Commission not yet proposed the long-term legislation, which was originally announced for June?

- The Commission remains committed to the long-term legislation, which is currently being prepared by Commission services. The later than expected adoption of the interim Regulation also delayed preparation of the long-term legislation. The Commission now expects to propose the long-term legislation in March 2022.

What is being done relating to prevention?

- We will work together with all relevant actors from the public and private sectors, within and outside the EU, to increase cooperation and exchange of best practices under the prevention network of practitioners and researchers. The EU centre to prevent and counter CSA will have a key role in boosting prevention efforts. It will support and cooperate with the prevention network, but also act as counterpart for similar centre globally.
- We are also working to improve the protection of children from sexual abuse globally by supporting and cooperating with the WeProtect Global Alliance; some activities of which are financed by ISF.
- In addition, we will also continue to provide funding to support initiatives aiming to enhance prevention.

Facts about child sexual abuse

NCMEC data

In 2021, NCMEC received 29.4 million reports, up from 21.7 in 2020 (35% increase). These reports contained 85 million files, up from 65 million in 2020 (30% increase). 555k of these reports were made available to EU Member States, down from 1 million in 2020 (47% decrease), due to Facebook's decision to stop detecting given the Interim Regulation discussions.

[The following breakdown is not available yet for 2021]

The amount of grooming cases reported globally increased by 98% in 2020 compared to the previous year (37 872 in 2020 vs 19 147 in 2019), presumably due to the pandemic, when both children and offenders spent more time online and at home.

The reports that service providers submitted in 2020 in relation to cases in the EU included 3.7 million images and videos of known CSAM, 528 000 images and videos of new CSAM, and more than 1 400 grooming cases .

Country	2019 Reports	2020 Reports
Austria	10,217	10,363
Belgium	21,448	22,154
Bulgaria	16,892	16,962
Croatia	13,068	12,582
Cyprus	2,502	3,302
Czech Republic	14,448	11,044
Denmark	6,148	6,504
Estonia	1,951	4,695
Finland	4,850	4,419
France	71,422	89,871
Germany	87,895	92,768
Greece	18,911	28,722
Hungary	57,500	66,123
Ireland	6,653	6,959
Italy	57,113	62,399
Latvia	1,347	1,418

Country	2019 Reports	2020 Reports
Lithuania	11,857	7,624
Luxembourg	1,506	1,488
Malta	1,978	1,649
Netherlands	25,753	25,704
Poland	77,741	381,254
Portugal	30,369	26,982
Romania	106,764	59,324
Slovakia	6,769	6,554
Slovenia	6,890	5,242
Spain	46,836	70,544
Sweden	16,404	19,699
Total	725,232	1046,349

A single company, Facebook, submitted 95% of the reports in 2020. Five companies (Facebook, Snapchat, Google, Microsoft and Twitter) submitted 99% of all reports in that year. A complete breakdown of number reports by companies can be found in Annex 2.

The number of reports received by law enforcement in the EU in Jan-October 2021 has decreased by 2/3 compared to the same period last year, driven by Facebook's decision to turn off the detection of CSA online in the EU on December 2020.

- 1 January – 30 October 2020: 972,581 reports, vs 341,326 reports in 1 January – 30 October 2021.
- As most of the reports come from Facebook Messenger, this confirms the previous estimate on the decrease in the number of reports that would occur if Facebook implements end-to-end encryption, as the consequences would be practically the same as turning off the detection of CSA.
- This means a loss of 2100 reports per day, reports that could have led to rescue of children from ongoing abuse and the prevention of further abuses by arresting offenders.

There are currently 1630 companies registered to report to NCMEC. In 2020, NCMEC received reports from 167 service providers, meaning that approximately 88% of providers registered with NCMEC made no reports at all. Of these 167 providers, around 80% made fewer than 100 reports.

ECPAT survey

In November 2021, the ECPAT network on ending the sexual exploitation of children, with 122 mostly NGO members in 104 countries, conducted a [survey](#) on public attitudes towards privacy and child protection online in 8 Member States (DE, FR, IT, NL, PL, SE, ES, HU). The [majority of respondents indicated that](#):

- Detection (of CSA online) is perceived to be **as or more important than people's personal privacy** online (76% of respondents)
- There is a **strong support** for the upcoming legislative proposal on CSA (mandatory detection by companies), even when people hear about the possible downsides (68%)
- People believe that **kids are not safe online (73%)**
- People believe that online privacy has gone (68%)

WeProtect Global Alliance-Global Threat Assessment, 2021: main findings

- Offenders continually seek new tools.

Over 56.8% of all discussion observed on known offender dark web forums was related to new tools to evade detection and make offending more secure—with the only other two categories being Social Media Platforms (32.8%) and Direct Messaging (10.4%).

- Masked language hides harmful content in gaming.

Veiled or hidden use of typical grooming or child sexual abuse material (CSAM) terms in Gaming has grown over 13% in 2019-2020. This resulted in an increase of 50% additional harmful content detected.

- Cloud sharing

Fuels interactions with harmful content. From 2020 Q1 to 2021 Q1, instances of user engagement or interactions with harmful content relating to CSEA exploded to nearly 20 million in Q1 2021—up significantly from more than 5.5 million in Q1 2020.

- Offenders re-traumatize survivors using fake profiles.

Many offender groups reference known CSAM survivors to indicate online preferences and to find and network with like-minded individuals. In Q1 2021, Crisp identified 3,324 unique pieces of posted content, each resulting in as many as 2,000 interactions. This “network effect” illustrates the malignancy of this sharing, with each interaction perpetuating the exploitation of the survivor referenced in the account.

US and NCMEC statistics: In 2020, there were over 21.7 million reports of suspected child sexual exploitation made to the National Center for Missing & Exploited Children's CyberTipline. Online enticement reports — which detail when someone is communicating with a child via the internet with the intent to exploit them — increased by more than 97% from the year before.

Half of offenders arrested for CSAM possession were or had been physically abusing children; detection of CSAM frequently leads to stopping hands on/physical abuse happening in parallel.

A high proportion of cases involved material depicting extreme abuse and/or large quantities of material; viewing CSAM increases demand for more and more extreme abuse - 52.2% of offenses included images or videos of infants or toddlers.

Safety by design to safeguard children online

Safety by design is an important preventative and proactive approach that ensures user safety is embedded into the design, development and deployment of online digital products and services. This approach involves consideration of age-appropriate design and access to services that take into consideration the child users' maturity and capacities when interacting with technical platforms and online services.



CSEA Voluntary Principles.pdf

2. [Redacted]



[Redacted]

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