

80+ Child Rights Organisations Urge EU leaders Not to Step Back in Protecting Children Online

9 November 2023

Dear Members of the LIBE Committee,
Dear Member States representatives,

We, a coalition of over 80 organisations and survivors committed to advancing children's rights and the elimination of sexual abuse, would like to share with you our deep concern at the recent developments in the negotiations on the proposed EU Regulation to prevent and combat child sexual abuse.

The recent compromise announced by the European Parliament would lead to a **significant step back from the current situation in the protection of children online**. The proposed compromise would **eliminate the ability for platforms to voluntarily detect** for online child sexual abuse, **not allow for the detection of grooming** or solicitation of minors, and would **restrict the technology to detect** to such a small group of individuals that the Regulation would fall short in tackling these crimes at scale.

Our message is simple and clear: we cannot accept a step backwards in the protection of children online. It has been proved that comprehensive detection of child sexual abuse saves lives and rescues children from danger. A weak legal framework will immediately lead to reducing the number of the reports and, therefore, the number of children and victims protected. In 2021, we saw a [drop of 58%](#) in reporting when no legislation was in place to allow platforms to detect, remove and report child sexual abuse online. We are at risk of history repeating itself.

- **Targeted detection of suspects is not workable in practice due to the scale of the phenomenon online** - platforms detected 99% of the [88.3 million images and videos of child sexual abuse](#) online reported last year. If we only allow detection of images and videos when a suspect is identified, we will **limit the detection to an extremely small number of cases and children**, enabling potential abusers to easily perpetrate below the radar of law enforcement. As the Commissaire Gabrielle HAZAN, Cheffe de l'Office Mineurs de la Direction Nationale de la Police Judiciaire, says: **"If we stop detecting, investigators will go blind, if we stop detecting, we simply give up on protecting our children."**
- Voluntary detection is critical: **without voluntary detection, platforms are not able to properly safeguard their services and to protect children**. Significant protection gaps will arise during the long process leading to a detection order.
- Preventing online and offline manifestations of child sexual abuse is an essential part of the solution. **Deciding against detecting grooming means that we give up on the possibility of preventing future harm from happening in the first place.**

Every second, at least 2 pictures or videos of child sexual abuse is published online and reports of [grooming increased by 82%](#) from 2021 to 2022. This is a fundamental breach of the rights of the children depicted in the picture or video to protection and privacy. In January 2023 alone, Meta disabled more than [490,000](#) accounts for violating its child safety policies. Behind every picture and act of grooming, there's a child who is suffering harm or who will suffer as a result of that picture being shared. **Every image counts and is vital to protecting children.**

Today, **survivors' number one demand is clear: "[detect and remove](#)".** They can't keep walking in the streets with the fear of being recognised and with no way to stop images of the worst time of their lives from being shared online again and again. **Their privacy must be protected too.**

We trust that the co-legislators will not fail children in the midst of a child sexual abuse online crisis.

Now is the time to ensure a workable, solid and effective EU regulation is negotiated and fit for its purpose. **We call on the co-legislators of the EU, to fulfill your commitment to protect children against sexual abuse,** by ensuring the detection of all illegal CSAM materials and grooming, in all online spaces where children are.

Signed by:

Activists and survivors of childhood sexual violence

Florence Elie, Matthew McVarish, Mié Kohiyama, [Patricia Cardona Roca](#), Patrick Sandford, Virginie Peyré.

Organisations committed to advancing children's rights and the elimination of sexual abuse

1. ["Hope For Children" CRC Policy Center](#)
2. [#IWAS association](#)
3. [Agarrados à Net / Clinging on the Net](#)
4. [ARSIS Association for the Social Support of Youth](#)
5. [Asociația Eliberare \(eLiberare\)](#)
6. [Association for action against violence and trafficking in human beings-Open Gate/La Strada](#)
7. BeBraveFrance
8. [Bens Place \(Survivors West Yorkshire\)](#)
9. Brave UK
10. [Bund Deutscher Amateurtheater \(BDAT\)](#)

11. [CAMELEON Association France](#)
12. [Canadian Centre for Child Protection](#)
13. [Center for Missing and Exploited Children](#)
14. [Central Union for Child Welfare / Lastensuojelun Keskusliitto](#)
15. [Centro Integrado de Apoio Familiar \(CIAF\)](#)
16. [Cesta z krize](#)
17. [Child Focus](#)
18. [Child Helpline International](#)
19. [ChildFund Alliance](#)
20. [Childnet International](#)
21. [ChildX](#)
22. [COFACE Families Europe](#)
23. [CRCA/ECPAT Albania](#)
24. [Defence for Children - ECPAT Netherlands](#)
25. [Different & Equal](#)
26. [Digital Opportunities Foundation / Stiftung Digitale Chancen](#)
27. [ECPAT Austria](#)
28. [ECPAT Bulgaria - Neglected Children and Women Foundation](#)
29. [ECPAT France](#)
30. [ECPAT International](#)
31. [ECPAT Norway](#)
32. [ECPAT Sweden](#)
33. [Élien Rebirth](#)
34. [Emmanuel Development Association](#)
35. [Empowering Children Foundation \(Fundacja Dajemy Dzieciom Się\)](#)
36. [Enough Is Enough](#)
37. [Eurochild](#)
38. [Federación de Asociaciones para la Prevención del Maltrato Infantil - ECPAT Spain](#)
39. [Foundation Together Albania](#)
40. [Halley Movement Coalition](#)
41. [Happy Kids Foundation](#)
42. [Hintalovon Child Rights Foundation - ECPAT Hungary](#)
43. [ICOSE](#)
44. [IJM Deutschland](#)
45. [Innocence in Danger e.V.](#)
46. [INSTITUTO DE APOIO À CRIANÇA](#)
47. [International Centre for Missing & Exploited Children \(ICMEC\)](#)

48. [International Justice Mission Center to End Online Sexual Exploitation of Children](#)
49. [International Justice Mission Nederland](#)
50. [Internet Watch Foundation](#)
51. [iSIGURT.AL - National Hotline on Internet Child Safety - Albania](#)
52. [ISPCC](#)
53. Justice Initiative Portugal
54. [Lasten perusoikeudet - Children's Fundamental Rights ry](#)
55. [Latvian Safer Internet Centre](#)
56. [Les Ami\(e\)s de Romy](#)
57. [Lightup Norway](#)
58. [Lucy Faithfull Foundation](#)
59. [Marie Collins Foundation](#)
60. [Missing Children Europe](#)
61. [MiudosSegurosNa.Net / KidsSafeOnThe.Net](#)
62. [National Center for Missing & Exploited Children](#)
63. [National Network for Children - Bulgaria](#)
64. [Network for Children's Rights \(NCR\) - Δίκτυο για τα Δικαιώματα του Παιδιού](#)
65. [NGO "Stop sexting"](#)
66. [NSPCC](#)
67. [One in Four](#)
68. [PFAD Bundesverband der Pflege- und Adoptivfamilien e.V.](#)
69. [Protect Children, Suojellaan Lapsia ry](#)
70. [Quebrar o Silêncio](#)
71. [Save the Children](#)
72. [SWGfL](#)
73. [Terre des Hommes France](#)
74. [Terre des Hommes International Federation](#)
75. [Terre des Hommes Italia](#)
76. [Terre des Hommes Netherlands](#)
77. [The Brave Movement](#)
78. [The Smile of the Child](#)
79. [Thorn](#)
80. [Together for Girls](#)
81. [Vatra Psycho Social Center](#)
82. [WeProtect Global Alliance](#)
83. [Women against Violence Europe Network \(WAVE Network\)](#)
84. [World Vision EUREP](#)