



#### Joint industry statement

#### Call on Member States to allow the continuation of current CSA detection practices

*Brussels, 11 March 2025*

The undersigned industry associations (Adigital, ACT | The App Association, Chamber of Progress, CCIA Europe, DOT Europe, eco, EuroISPA, I2Coalition, ITI, NL Digital, techUK and ZPP) and their members are deeply committed to making the digital space safe for everyone and, in particular, to protecting children online. We firmly support the European Commission's objective to prevent and combat any type of child sexual abuse online and remain committed to supporting law enforcement investigations while upholding privacy and fundamental rights.

Building on our previous joint statement<sup>1</sup> welcoming the extension of the temporary ePrivacy Directive derogation, we reaffirm that proactive measures against CSA have been instrumental in protecting children online over the past decade.

As the extension is only a temporary solution, we strongly support the introduction of a legal basis for voluntary detection as proposed by the Polish Presidency in its latest compromise proposal (28 January). The suggested text establishes a permanent legal basis for number-independent interpersonal communication service (NI-ICS) providers to continue detecting, removing, and reporting CSA. In the absence of detection orders, integrating the derogation of the ePrivacy Directive directly into the CSA Regulation ensures a clear and sustainable legal framework for NI-ICS providers to maintain these essential efforts.

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<sup>1</sup> Call on policymakers to swiftly adopt the extension of the interim ePrivacy Derogation, 23 January 2024: <https://doteurope.eu/wp-content/uploads/2024/01/Joint-call-on-policymakers-to-swiftly-adopt-the-Interim-Regulation-1.pdf>

This proposed provision will offer much-needed legal certainty for NI-ICS providers working to combat CSA, enabling continued investment in proven detection and deterrence technologies<sup>2</sup>. Without it, these widely accepted and effective tools would no longer be possible, reducing actionable intelligence for law enforcement.

We agree that voluntary detection should be a first step, as children across Europe hold equal rights to be protected from all forms of abuse (Article 19 of the Convention on the Rights of the Child), regardless of the platform they are on.

We therefore strongly urge Member States to maintain Article 4a as proposed in the latest compromise text. We remain committed to supporting legislation that is future-proof, tech-neutral, effective, and firmly in the best interest of children.

#### *Signatories*

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<sup>2</sup> PhotoDNA and CSAI Match are examples of existing technologies for the detection and combat of child sexual abuse imagery material.