



European Parliament  
Bât. Altiero Spinelli  
60 rue Wiertz / Wiertzstraat 60  
B-1047 - Bruxelles/Brussels  
Belgium

9 July 2013, Brussels

## **re: retention of funding of the Safer Internet Programme to ensure the survival of Internet hotlines**

Dear members of the ITRE committee,

The European Internet Services Providers Association (**EuroISPA**) is the world's largest association of Internet Services Providers, representing over 1800 ISPs across Europe.

As all our members have developed notice and take-down procedures in order to remove illegal content at source, and some of them also operate "hotlines" funded by the European Commission mainly to fight against child pornography, we feel very concerned about the future of the Safer Internet Programme under the Connecting Europe Facility.

### **SUPPORT HOTLINE FUNDING FOR REMOVAL OF ILLEGAL CHILD SEXUAL ABUSE MATERIAL**

Currently, the European Parliament has to vote through amendments to the **proposal for a regulation of the Parliament and of the Council on guidelines for trans-European telecommunications networks**. **Very welcome and positive amendments** by MEPs Jürgen Creutzmann (ALDE, Germany), Graham Watson (ALDE, UK) Erik Bánki (European Peoples Party, Hungary), Vicky Ford (European Conservatives and Reformists Group, UK), Rolandas Paksas (Europe of freedom and democracy Group, Lithuania) and Angelika Niebler (European People's Party, Germany) deserve the full and complete support of all MEPs.

In this context we ask that you endorse these amendments (**Amendments 6-7, Amendment 56, Amendments 35, 36, 52, 53 and Amendments 56-62**) and ensure that an adequate package of funding measures, commensurate with the currently yearly allocation is approved. It is essential that this package includes allocated funds to support INHOPE Network Co-Ordination along with hotlines within each member state.

The hotlines' role is crucial in receiving, processing and assessing anonymous reports of alleged child sexual abuse material and in cooperating closely with law enforcement to apprehend pedophiles.

The main objective of hotlines is the **fast removal of child sexual abuse material at source**. The strength of the INHOPE network comes from the number of members over Europe and rest of the World (**44 members in 38 countries**) ability to act **instantaneously** to obtain the take-down of an illegal content forwarded by another hotline.

As a result of the successful operation of hotlines, according to the latest report from INHOPE, they have handled even more reports in 2012 (+25%), than the previous year.<sup>1</sup> Moreover, almost 90% of illegal content is removed between one week, and 60% within 72 hours.

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<sup>1</sup> INHOPE statistics on the acceleration of notice and take-down efforts in Europe and the global distribution of CSAM, published in the INHOPE Annual Report 2012

[http://www.inhope.org/Libraries/Annual\\_reports/INHOPE\\_Annual\\_Report\\_2012.sflb.ashx](http://www.inhope.org/Libraries/Annual_reports/INHOPE_Annual_Report_2012.sflb.ashx)

If hotlines are deprived of anything less than adequate and full European funding allocated under the Connecting Europe Facility, their work would be definitively disrupted. Furthermore, the concrete application of several European texts<sup>2</sup>, would be definitively undermined. In particular, the **notice and take-down procedures**, constantly promoted by European institutions for several years, and improved thanks to the cooperation between hotlines, Law Enforcement and ISPs to speed up removal of content, will lose any efficiency.

Europe should be aware that for several hotlines the EU funds are the only source of income, without which they would disappear in the medium term. Nor can it be expected that, in a period of economic crisis, hotlines could be financed exclusively through private donations.

## **URGENT: ALLOCATING A BUDGET IS VITAL TO PROTECT CHILDREN FROM CHILD SEXUAL ABUSE, SEXUAL ENTICEMENT & ILLEGAL CONTENT ON THE INTERNET**

Cutting any financial support to national hotlines would be a catastrophic step backwards in the protection of children and young people in Europe and worldwide. We applaud the amendments and urge all MEPs to re-affirm the commitment of European institutions made in current initiatives on this delicate matter.<sup>3</sup>

Therefore, EuroISPA calls on you to affirm your laudable commitment to earlier advances, such as the Child Exploitation Directive, and join the initiative to ring-fence funding and to ensure the survival of the the European hotlines and the Safer Internet Centres within the Connecting Europe Facility with a minimum fund of **100M EUR** for the **next 7 years** as was similarly provided in the budget allocated for the 2009 to 2012 period.

Kind regards,

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<sup>2</sup> Directive 2000/31/EC on electronic commerce and Directive 2011/92/EU on Combatting the sexual abuse and the sexual exploitation of children and child pornography, and replacing Council Framework Decision 2004/68/JHA;

<sup>3</sup> COM(2012)196, Commission Communication on European Strategy for a Better Internet for Children, Directive 2011/92/EU on Combatting the sexual abuse and the sexual exploitation of children and child pornography, and replacing Council Framework Decision 2004/68/JHA; CEO Coalition; Global alliance to fight online child abuse.