



To all Irish Members
of the European Parliament

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Dear Honorable Member of the European Parliament,

I am writing to you on behalf of ISPai, the Internet Services Providers Association of Ireland, in relation to the Resolution on the fight against child sexual abuse material online that will be adopted in plenary session on March 11th.

At the outset I would like to emphasise our support for this initiative but wish to draw your attention to a limitation which we believe could stifle its real effectiveness in the immediate future.

ISPai's members, together with our European counterparts, are at the forefront of the fight at national and international levels against such abhorrent content being distributed over the Internet. Our members, Internet Services Providers (ISPs), comply with the Directives on fighting Child Sexual Abuse Material (CSAM) and swiftly remove illegal content in cooperation with police and hotlines. Indeed, EuroISPA members in France, Ireland, Austria and Germany actually run the national hotlines for their countries. Criminal misuse of telecommunications infrastructure for CSAM is a societal issue and so Hotline services have been grant aided by the EC for the last 15 years.

Hotlines are essential to the process of "notice and takedown" as they provide the means for members of the public to alert ISPs to the presence of suspected CSAM on the Internet. In the globalised Internet, Hotlines act as a crucial filter ensuring that police and ISPs in the appropriate jurisdiction are provided with notifications of illegal CSAM that have been confirmed by trained analysts. The activity of Hotlines in this regard is coordinated by the International Association of Internet Hotlines (INHOPE).



Representing the world's 51 Hotlines across 45 countries, INHOPE has been funded by the European Commission since 1999.

ISPAI believes that the essential role of the hotline network, as the primary means of collecting anonymous reports of suspected CSAM from the public, to rapidly alert law enforcement and ISPs, needs to be clearly acknowledged in the text of the Resolution.

Furthermore, we are extremely concerned that the text does not address the funding of such Hotlines. During the discussions on the Connecting Europe Facility (CEF) where, after being almost overlooked, European budget was included for hotlines in the short term. The European Parliament then supported a reduction of the European funds allocated to CEF. This also reduced the amount of funds now available to the European national Hotlines and many are already facing economic difficulty. We understand from the European Commission that these funds will only last until the end of June 2016. After this date there will be no budget left to support Hotlines. The consequence will be that most Hotlines in Europe, which are supported mainly by EU money, will not be able to cover their operational costs and will simply disappear.

ISPAI believes that it is your direct responsibility, as Member of the European Parliament, to prevent this from happening. It would be contradictory to have the European Parliament supporting the fight against child sexual abuse material online while undermining the very existence of Hotlines which play such a key role in the process of fighting against this content.

ISPAI considers it necessary to specifically refer to the problem of EU funding to Hotlines in the text of the Resolution and to underline the need to start a discussion with the European Commission and Member States on possible solutions to prevent the collapse of the European system of Hotlines.

We count on your sensitivity to this societal problem and the issues mentioned above. We trust that you will seek to ensure these points are included in the Resolution and supported in the plenary vote.



I would like you to know that ISPAI supports current and future initiatives to fight such abhorrent content and we look forward to answering any questions you may have as an MEP who, I am sure, equally wishes to see effective actions to curtail CSAM online.

Yours sincerely

Paul Durrant
Chief Executive ISPAI

ISPAI represents 54 ISPs operating in Ireland and is also a member of EuroISPA, the organisation of European ISP Associations.

The following are our members in Ireland:

