

What the EU Child Sexual Abuse Regulation Must Deliver

An IWF briefing for European policymakers

Child sexual abuse material continues to be uploaded and recirculated online at scale. Europe needs a framework that can keep pace.

For three decades, the Internet Watch Foundation (IWF) has worked at the operational frontline of tackling child sexual abuse material online. In 2025, 63% of the URLs actioned for removal by IWF analysts were hosted on servers within the European Union.

The EU's Child Sexual Abuse Regulation must establish a robust, proportionate and future-proof framework. It must not result in Europe losing existing capabilities to identify, report and remove child sexual abuse material.

IWF's Key Asks for the CSA Regulation

01 Detection is essential to protect children

Automated detection technology is critical for identifying the enormous volume of child sexual abuse material being shared online every day by offenders.

Known child sexual abuse material must be prevented from being repeatedly re-uploaded. Once material has been confirmed as illegal, victims should not have to endure the same abuse material being repeatedly shared. Technologies such as hash matching allow known child sexual abuse material to be identified and blocked easily when attempts are made to re-upload this imagery.

But detection cannot stop at known child sexual abuse material. Databases of known material can only grow when previously unseen material is identified, assessed and added. If the ability to identify new material is lost, these databases will become less effective over time. This is increasingly important as AI-generated child sexual abuse material creates growing volumes of previously unseen material. A future-proof framework cannot protect only those victims whose abuse has already been identified.

The Regulation should support appropriately safeguarded technologies capable of addressing all forms of child sexual abuse material.

02 A permanent legal basis for detection

For more than a decade, online interpersonal communication service providers have voluntarily used technology to help identify and remove CSAM on their services in the EU. This has been an important part of the global response to online child sexual abuse.

Providers need legal certainty to continue this work and adapt their systems as offending behaviour and technology evolve. The EU should establish a permanent and clear legal basis for detection, subject to appropriate safeguards, oversight and transparency.

The framework should enable responsible providers to continue taking action against child sexual abuse material rather than creating legal uncertainty that could weaken or lead to the withdrawal of existing protection measures.

03 Detection cannot be limited to known suspects

A system that relies exclusively on identifying individual suspects before action can be taken will miss a significant amount of abuse.

Offenders sharing child sexual abuse material can create new accounts, move between services and use technologies and platforms in ways that make them difficult to identify in advance. By definition, authorities do not already know the identity of every person sharing illegal material.

Law enforcement investigations remain essential, but they cannot replace technological tools that identify material and activity not yet connected to a known individual. The Regulation should ensure that effective detection is not reduced solely to individual users already suspected and instead preemptively stops the circulation of child sexual abuse imagery.

04 A strong and effective EU Centre

The EU Centre should be a strong, independent and adequately resourced body at the heart of Europe's response to online child sexual abuse.

It should support the assessment and triage of reports of suspected child sexual abuse material; provide specialist technical guidance on detection and child-safety technologies; support research and innovation in response to emerging threats, including AI-generated CSAM; and ensure structured cooperation with expert stakeholders from both within and outside of the Union, including hotlines and helplines.

What can you do?

You can help ensure that the EU Child Sexual Abuse Regulation delivers meaningful, effective and future-proof protection for children.

01 Speak to your political group and national delegation

Raise the importance of maintaining effective detection, reporting and removal capabilities with your political group, national delegation and colleagues working on the file.

02 Engage your national government

Contact your national government and relevant ministries to understand and influence their position in the Council. Encourage them to support a robust, workable and future-proof framework.

03 Raise the issue with negotiators

Speak to your group's coordinators, shadow rapporteurs and other MEPs directly involved in trilogue negotiations. Ask how they are working to ensure the final Regulation does not weaken existing child-protection capabilities.

04 Ask what the Regulation will deliver in practice

Challenge proposals that could create gaps in protection. Ask:

- Will providers still be able to find, report, and take down child abuse material effectively under these new rules?
- Will the system be able to catch new material it hasn't seen before - including fake images or videos created using AI?
- Will companies that want to do the right thing have enough legal protection to keep scanning for this material voluntarily, without fear of being sued or penalised?
- Will the new EU body in charge of overseeing this (the "EU Centre") actually have enough staff, funding and know-how to make the whole system work? Will they hear and work with worldwide experts?

05 Bring operational evidence into the debate

Use meetings, debates, written questions, events, press and social media to ensure that evidence from organisations working on the frontline informs political decisions.

06 Stay engaged

The details of the final Regulation matter. Follow negotiations closely and raise concerns where compromises risk undermining Europe's ability to respond effectively to child sexual abuse online.

Europe must not move backwards. The final Regulation should preserve and strengthen our ability to detect, report and remove CSAM, while providing a framework capable of responding to how online child sexual abuse will evolve in the years ahead.

If you have any questions, need further data and evidence, or want to discuss further then please email policy@iwf.org.uk



For more information and to take action, visit our campaign website, ThePetitionNoOneWouldSign.com

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