

Annual Report

2025

Welcome Message



Michael Terhörst

Head of the German Federal Office for the Enforcement of Children's Rights in Digital Services (KidD)

Dear Readers,

For 30 years, the eco Complaints Office has made an indispensable contribution to the protection of children and young people in digital environments through its dedicated work. Over the past 30 years, the requirements for the youth media protection have changed rapidly. In 1996, no one was thinking about Instagram or TikTok, and when people heard DSA (which nowadays is used as an abbreviation for the Digital Services Act), they were more likely to think of the “Deutsche Sportabzeichen” which translates to German Sports Badge.

Today, we live in a different world: social media and AI applications shape the everyday lives of children, young people, and adults. Alongside the many opportunities, a wide range of risks has also arisen. Children and young people encounter content as well as communication features and platform functionalities on social networks that can overwhelm or negatively influence them. These include depictions of violence or pornographic content, but also cyber-grooming on an unprecedented scale. Particularly where monetary interests are placed above the safety

of children and young people, we see offerings with insufficient safeguards. There is an urgent need for action and regulation to adequately and consistently address risks such as sexualized violence against children and young people.

The Digital Services Act (DSA) has established a foundation across the EU for consistent regulation of online service providers. The German Federal Office for the Enforcement of Children's Rights in Digital Services (KidD), which I have headed since 2024, regulates digital services based in or represented in Germany on this basis and works closely with the European level. This work requires strong partners.

Over its 30 years of existence, the eco Complaints Office has continually evolved and adapted to new technical and societal conditions in order to effectively fulfil its role as a self-regulatory body. Its work goes far beyond merely receiving reports. It involves assessment, knowledge sharing and, most importantly, cooperation. After all, the fight against the risks to which children and young people are exposed cannot be fought alone. Whether civil society, regulators, politicians, providers or associations – everyone must contribute to protecting those who cannot yet protect themselves.

The importance of preventive measures such as functioning reporting and remediation systems is demonstrated by the successful work of the eco Complaints Office. The new record figures show once again that the eco Complaints Office enjoys high esteem among providers, in the professional community and in society, and has earned a great deal of trust. The high deletion rate leads to lower availability figures and confirms the “take-down instead of blocking” approach.

I warmly congratulate the eco Complaints Office on its 30th anniversary and wish it continued success in carrying out its important tasks. I would like to personally thank the team of the eco Complaints Office for their consistently constructive and solution-oriented exchange. Here's to the next 30 years of partnership and cooperation!

Yours sincerely,
Michael Terhörst

Foreword



Alexandra Koch-Skiba
Head of eco Complaints Office

Dear Readers,

As the eco Complaints Office, we look back on an intensive year in 2025, marked by a high volume of complaints, the expansion of cooperation agreements, and a strong presence of the topics “modern youth media protection” and “handling of illegal online content” in political, regulatory, and societal discussions.

Compared to the previous year, the number of cases we examined in the area of youth media protection nearly doubled. In 30,035 cases, we identified a legal violation and subsequently took action. This not only represents a significant increase compared to the previous year, but also surpasses the previous record year of 2023, in which we recorded and processed 17,493 relevant cases.

At this point, I would like to express my sincere thanks to my team, who met this challenge with incredible dedication!

Good collaboration with network partners is essential for our work. Accordingly, over the past year we therefore expanded our partnerships and intensified our exchange with relevant stakeholders. I would particularly like to highlight the trusting and constructive exchange with the German Federal Office for the Enforcement of Children's Rights in Digital Services (KidD), the visits to and from our partner complaints offices (also known as "hotlines" in international contexts) in Luxembourg and Portugal, and our cooperation with DENIC eG. Our technological collaboration with the Voluntary Self-Regulation of Multimedia Service Providers (FSM) and nic.at should also be mentioned. The joint use and further development of the complaints management system enables additional process optimizations and the integration of further technological support in handling reports. Both aspects are especially important in view of the high number of cases and the long-standing commitment to staff welfare.

Modern youth media protection always includes the empowerment and participation of children and young people. It is therefore clear that teaching media literacy is particularly important – also with regard to parents, guardians, and educational professionals. In addition, raising society-wide awareness of the illegality of content that endangers young people and is punishable by law is of enormous importance. That is why we continued to actively offer webinars and workshops in 2025 and continued to share our expertise.

With regard to regulatory efforts, the CSAM Regulation proposed by the European Commission in 2022 was once again an important issue for us. After prolonged negotiations on the substance, the European Council agreed on a position on the regulatory

proposal in the second half of the year, so that the CSAM Regulation can now be further negotiated between the European Commission, the European Parliament, and the European Council in the so-called trilogue. In this process, ensuring the recognition and strengthening of the established work of hotlines remains a central concern for us.

Last year another topic relevant to our work emerged: the debate about new legal age limits in the digital space for children and young people. We will continue to engage constructively in the discussion surrounding minimum age requirements for the use of social media and other digital services, as well as the future design of age verification measures.

I look forward to continued collaboration, exchange, and joint activities!

Yours sincerely,
Alexandra Koch-Skiba

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1. eco Complaints Office:

**Who we are and
what we do**

eco



Dedicated to combatting illegal content on the Internet

The eco Complaints Office (complaints-office.eco.de) has been fighting illegal content on the Internet since 1996. It is an integral part of the system of regulated self-regulation and has the specific task of improving and promoting youth protection on the Internet.

The eco Complaints Office team is composed of six employees with a legal background, with these including the Head of the Complaints Office, two senior consultants, two consultants, and one content analyst.

Internet users can make a free and anonymous report on youth-endangering and prohibited content at

- complaints-office.eco.de
- internet-beschwerdestelle.de/en/
(a joint portal operated by eco and the German Association for Voluntary Self-Regulation of Digital Media Service Providers – FSM)
- Email to hotline@eco.de

In addition, in 2025 the eco Complaints Office continued to support JUUUUPORT, an advice, and help platform for young people. Reports of illegal content submitted via juuuport.de/melden were processed in cooperation with the hotlines of FSM and jugendschutz.net.

In order to effectively fight illegal online content, collaboration with other relevant players is essential. The eco Complaints Office therefore cooperates with, among others, providers, partner hotlines, and law enforcement agencies. eco is also a founding member of the International Association of Internet Hotlines (INHOPE), the international network of hotlines. In addition, eco is part of the German “Safer Internet Centre.”

In all of this, the eco Complaints Office serves as a model for neutral and transparent processes and acts as the contact partner for association members, the state, society and politics.

1.1 Simply and anonymously: Submitting a complaint

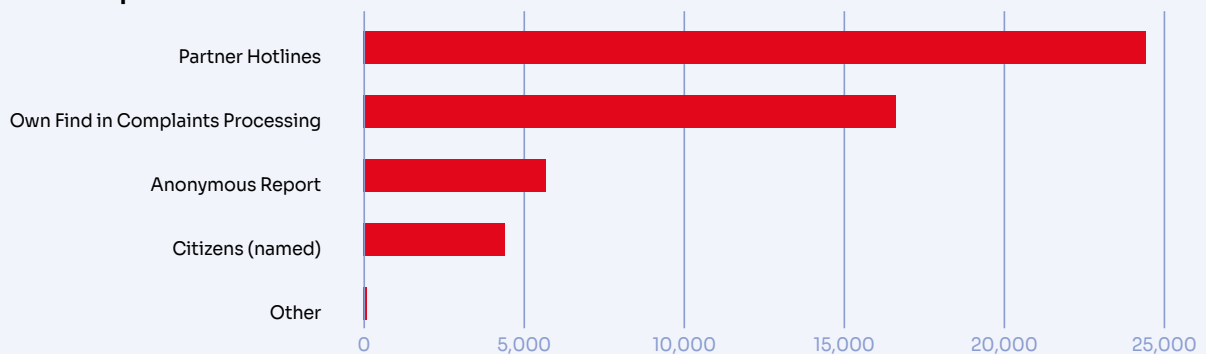
The eco Complaints Office accepts complaints regarding all Internet services: the World Wide Web, emails, file-sharing platforms and peer-to-peer networks, messaging services, Usenet communities, online forums, and mobile services and platforms. The content can be hosted on servers either within or outside of Germany and can be reported by all Internet users. The provision of personal data is optional, which also allows a report to be made anonymously.

In the reporting year, many complainants once again made use of the option to report illegal content anonymously to the eco Complaints Office: 5,727 cases were reported without the provision of any personal data.

In 2025, the sources of reports showed a high proportion of reports from the INHOPE network (24,400 reported cases).

Furthermore, many reports apparently referred to or indicated additional illegal content on other URLs that had not initially been identified. The eco Complaints Office also investigated these cases to the best of its ability. In addition, some providers of reported content changed their host provider in connection with the disconnection of URLs (so-called “moved” cases), meaning that new procedures had to be initiated due to new points of contact for the removal of the reported content. As a result, the share of “own findings during complaint processing” also increased during the reporting year.

Sources of Reports 2025



Source: eco Complaints Office, 2026

1.2 What kind of illegal content does the eco Complaints Office deal with?

Incoming complaints initially undergo a comprehensive legal assessment. The eco Complaints Office's assessment standard concentrates on youth media protection and related criminal offenses. In particular,

in the course of this process, the eco Complaints Office handles complaints related to the following illegal Internet content:

Sections 4, 5 German Interstate Treaty on the Protection of Minors in the Media, youth-endangering and developmentally impairing content, and the corresponding criminal regulations:

Section 184 et seq. German Criminal Code, Freely accessible adult pornography, pornography depicting violence, animals, children or juveniles

Section 86, 86a German Criminal Code, Dissemination of symbols and propaganda material of unconstitutional organizations

Section 130 German Criminal Code, Incitement to hatred

Section 130a German Criminal Code, Attempting to cause the commission of offenses

Section 131 German Criminal Code, Depictions of extreme violence

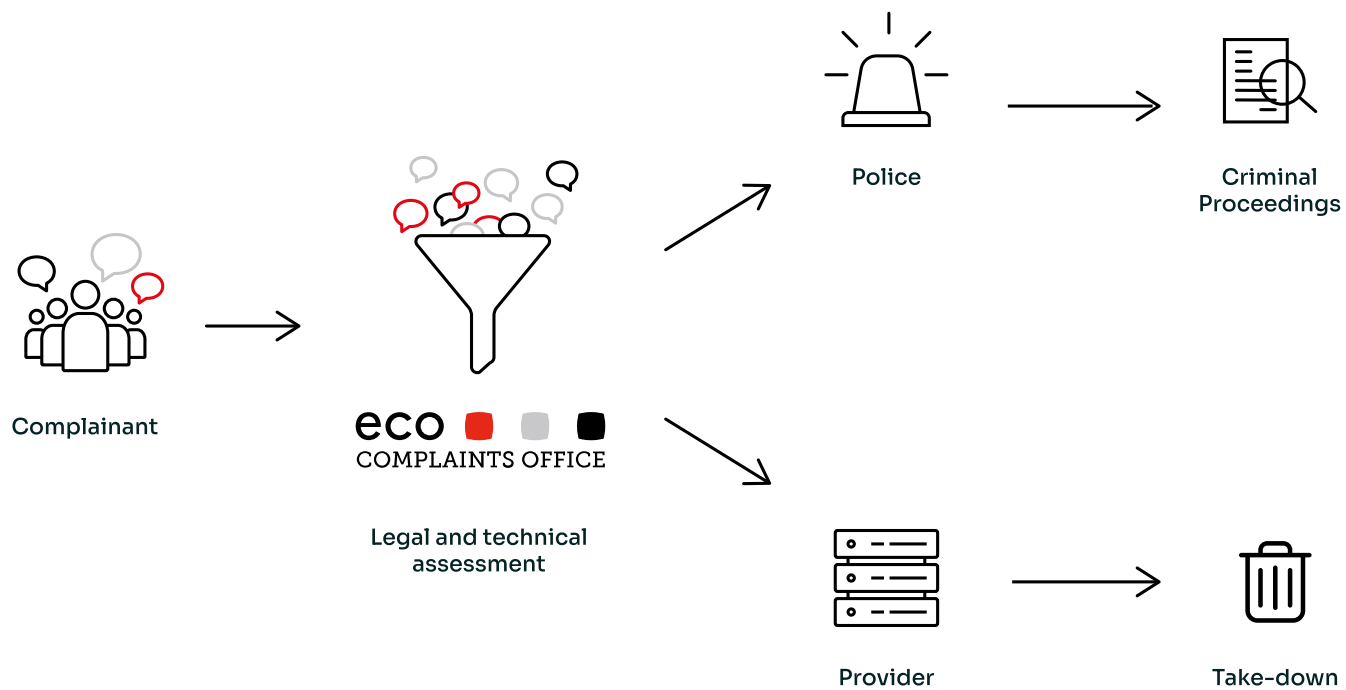
Section 176b German Criminal Code, Grooming

Section 201a German Criminal Code, Dissemination of naked images of minors for profit

Section 111 German Criminal Code, Public incitement to crime

In addition, the eco Complaints Office handles reports on the unsolicited sending of marketing emails and newsletters.

→ Information and definitions of the various offenses can be accessed online at: go.eco.de/Rechtsgrundlage-Beschwerdestelle



Source: eco Complaints Office, 2026

1.3 Measures of the eco Complaints Office: “Take-down instead of blocking”

In the fight against prohibited web content, the removal (take-down) of such content is the core and most worthwhile approach. The method is not only fast, but also effective and long-lasting. This is why the eco Complaints Office has pursued this approach from the very outset.

The Internet industry’s self-regulation mechanisms for the fight against unlawful online content work very well at both the national and international levels. In this regard, in the year under review, approximately 98.5% of the content reported by the eco Complaints Office was removed – worldwide. A detailed overview of the success rates and response times can be found in Sections 2.2 to 2.5.

After a thorough assessment of the content, action is taken depending on the severity of the offense and the location of the server (in Germany or in other countries):

Punishable Internet content hosted in Germany is always reported to the authorities. In addition, the eco Complaints Office asks the hosting provider to make the relevant data available to the law enforcement agency upon request and to take appropriate measures to prevent further access to the illegal content.

Should **absolutely prohibited Internet content** be hosted in Germany, the eco Complaints Office asks the hosting provider to remove (disconnect) the content. For other **youth-endangering or developmentally impairing content**, the provider will be requested to ensure that the content is made legally compliant (for example, through implementation of an age verification system).

Content hosted abroad is initially forwarded to the appropriate INHOPE partner hotline. This hotline then takes over the further processing of the complaint, with the objective of removal or legalization of the content, and also works “locally” with the responsible law enforcement agency of the respective state. If there is no INHOPE member in the country where the server is located, or if the content reported does not fall within the mandate of the INHOPE partner hotline, eco will contact the hosting provider directly.

In addition to this, criminal content hosted abroad is also reported to the authorities if it is criminalized internationally or is subject to the so-called universal jurisdiction principle as foreseen in the German Criminal Code. According to this principle, German criminal law is applicable in certain cases, even if the respective offense has no direct connection to Germany. However, in such cases, the offense

must be something directed against internationally protected legal interests; for example, in instances involving Child Pornography content or violations of international law.

The eco Complaints Office continuously monitors the continued availability of all reported content. If necessary, the provider will be asked again to remove or legalize the reported content.

Complainants who have provided a return address are generally briefly informed about the outcome of the legal assessment.



2. Complaints 2025: Facts and Figures

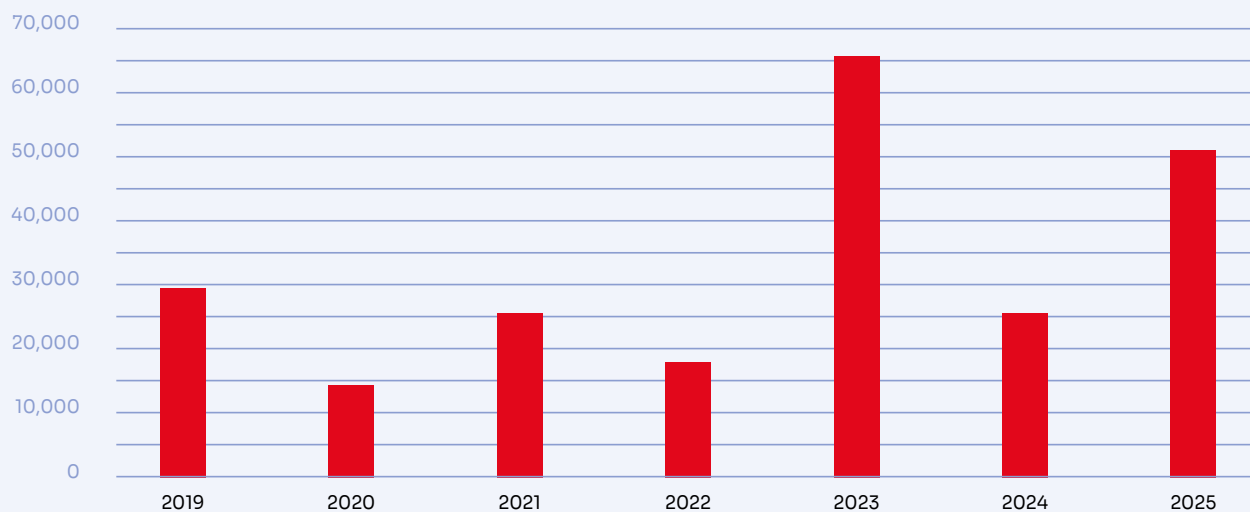
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2.1 Volume of complaints in the area of youth media protection

In the reporting year, the eco Complaints Office reviewed a total of 51,359 cases regarding potentially criminal or youth media protection-related Internet content.

Development of the Volume of Complaints in the Area of Youth Media Protection

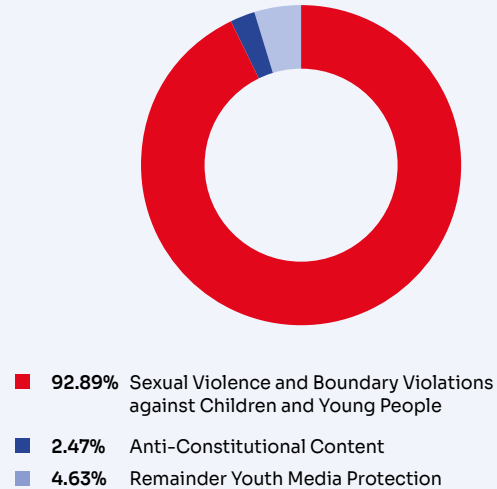


Source: eco Complaints Office, 2026

As in previous years, the majority – around 93% (47,709 cases) – of the complaints received related to the topic of “sexual violence and boundary violations against children and young people,” in particular depictions that were legally classified as Child Pornography* within the meaning of Section 184b of the German Criminal Code.

The offense of Child Pornography comprises depictions of sexual acts on, by, or in front of children, depictions of partially or completely naked children in a suggestive sexualized pose, and the sexually provocative reproduction of the naked buttocks or genitalia of children.

Received Complaints in the Field of Youth Media Protection 2025



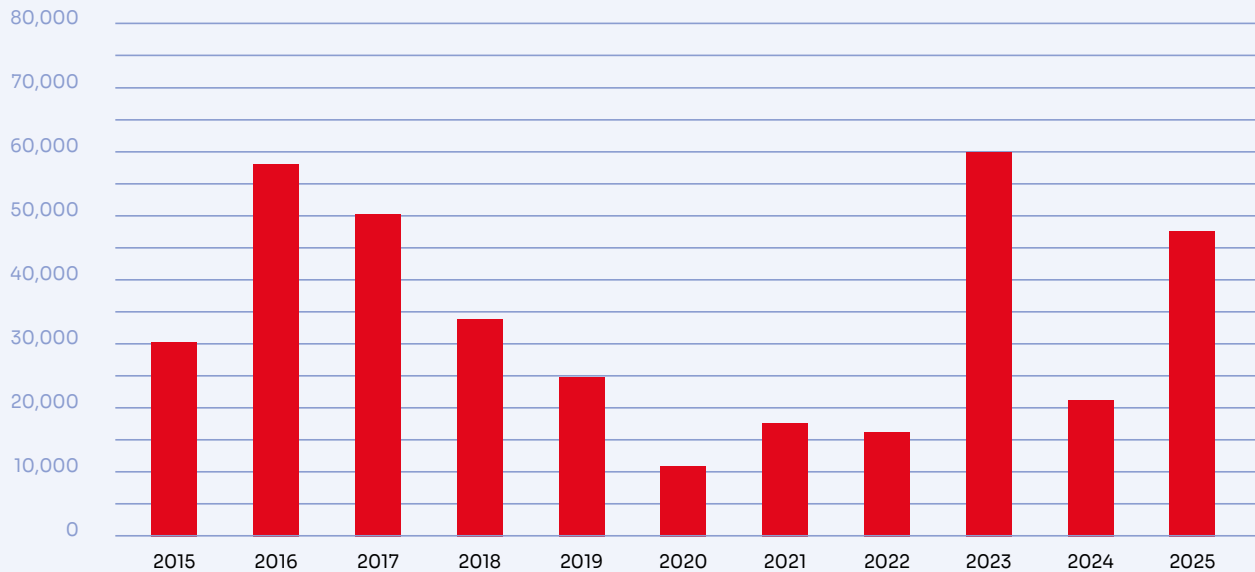
Source: eco Complaints Office, 2026

* In the Annual Report, this “terminus technicus” of the legal text is used when referring to depictions of abuse of children as defined in Section 184b of the German Criminal Code. This is not intended as an explicit endorsement of the terminology, but serves solely to differentiate between the individual offenses in the field of depictions of sexual abuse and sexual exploitation of minors.

Furthermore, the eco Complaints Office classifies the following offenses under the category of “sexual violence and boundary violations against children and young people”: youth pornography, cyber-grooming, violations of the highly personal sphere

of life under Section 201a of the German Criminal Code and images of posing within the meaning of Section 4 (1) No. 9 of the German Interstate Treaty on the Protection of Minors in the Media.

Reports Received Regarding Sexualized Violence Against Children and Young People – Year-on-Year Comparison



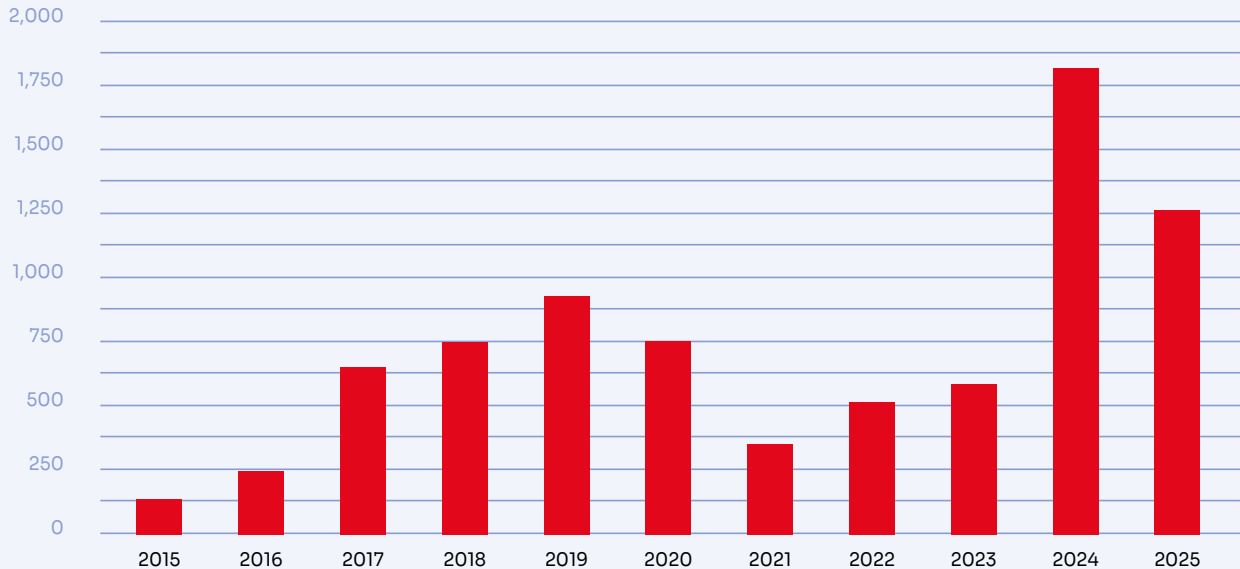
Source: eco Complaints Office, 2026

1,271 reports received concerned suspected anti-constitutional content.

The eco Complaints Office primarily classifies the following offenses as “anti-constitutional content” (in the broad sense): Incitement to hatred (Section 130 German Criminal Code), Dissemination of propaganda material of unconstitutional organizations (Section 86 German Criminal Code), Use of symbols of unconstitutional organizations

(Section 86a German Criminal Code), Disparagement of state and denigration of symbols (Section 90a German Criminal Code), Disparagement of constitutional organs (Section 90b German Criminal Code), Forming criminal and terrorist organizations (Sections 129 et seq. German Criminal Code), Revilement of religious faiths (Section 166 German Criminal Code), and Defamation directed at persons in political life (Section 188 German Criminal Code).

Reports Received Regarding Suspected Anti-Constitutional Content – Year-on-Year Comparison



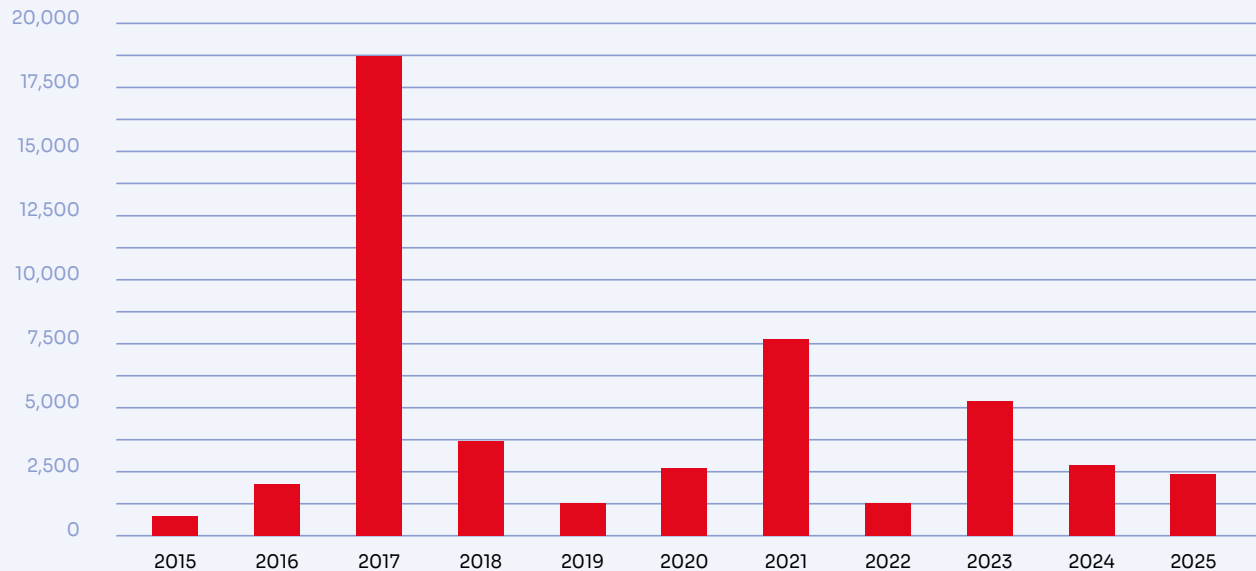
Source: eco Complaints Office, 2026

2,379 reports received concerned other content relevant to youth protection.

In the category “other content relevant to youth protection,” the following offenses are summarized

in particular: other sexual boundary violations such as freely accessible adult pornography, animal and violent pornography, as well as depictions of violence and other content that is harmful to young people or impairing to their development.

Reports Received Regarding Other Content Relevant to Youth Protection – Year-on-Year Comparison



Source: eco Complaints Office, 2026

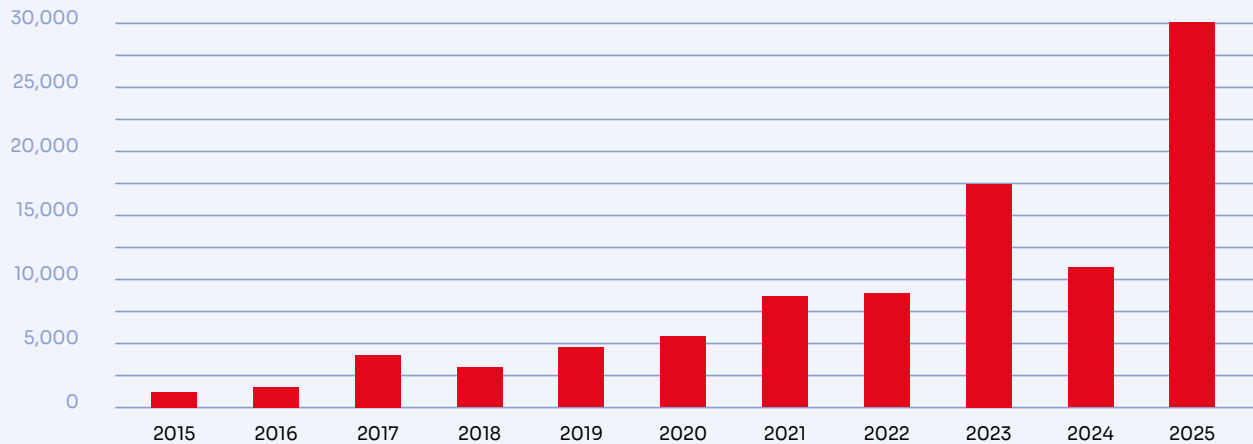
The fluctuations in the types of content reported reflect, among other things, the different societal and media developments that can influence the nature and frequency of such reports.

2.2 Overview of actionable complaints, measures, and successes

In the reporting year, 30,035 cases were deemed actionable for the eco Complaints Office (“actionable complaints”). A case is classified as an actionable complaint if a violation of the law is detected during the assessment and measures are subsequently taken. As a matter of principle, measures are taken for

every violation of the law, unless the eco Complaints Office is reasonably confident that the necessary measures have already been taken (e.g., reports to the police and to the eco Complaints Office in a joint email, knowledge of measures taken by partner hotlines, duplicate reports).

Actionable Complaints in Youth Media Protection – Year-on-Year Comparison



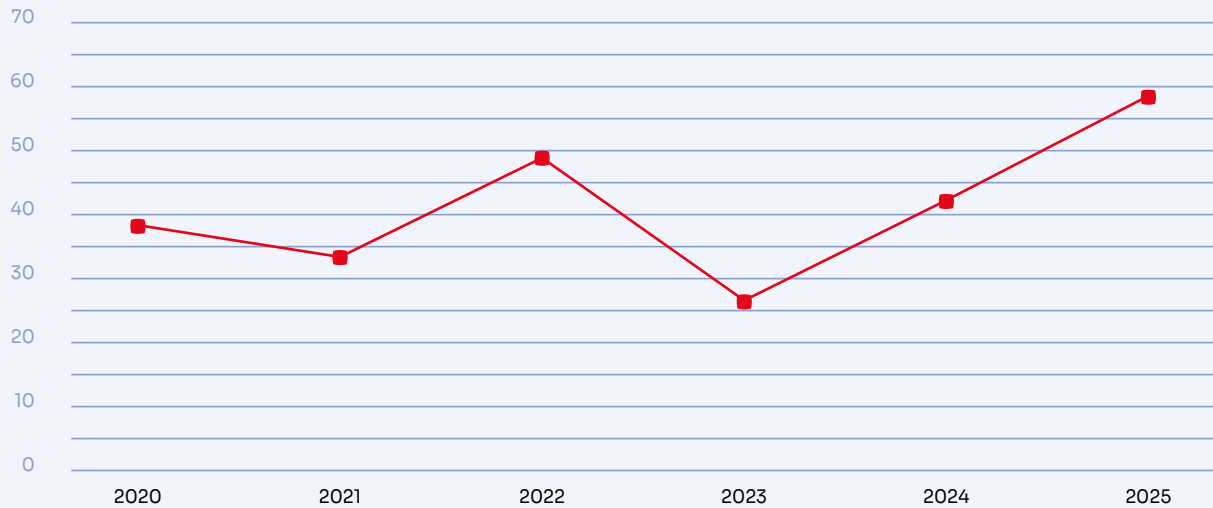
Source: eco Complaints Office, 2026

Compared to the previous year (2024: 10,922 actionable complaints), the number of actionable complaints nearly tripled, and there was also a significant

increase compared to the previous record year of 2023. The year 2025 thus marks a new all-time high in actionable complaints for the eco Complaints Office.

The percentage of actionable complaints increased by around 16 percentage points compared to the previous year, reaching 58.48%.

Percentage Share of Actionable Complaints in Youth Media Protection – Year-on-Year Comparison

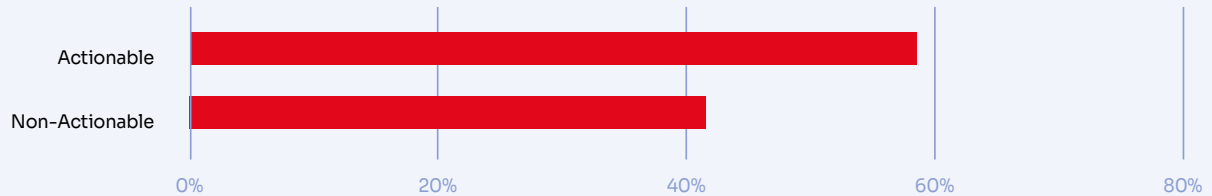


Source: eco Complaints Office, 2026

The percentage share of actionable complaints was consistently below 50% for many years and varies from year to year without a clear upward or downward trend. These fluctuations are not unusual, as

complaints depend on various factors, including current events that influence the reporting behaviour of users, and the often challenging assessment of complex legal criteria.

Non-Actionable Cases vs. Actionable Cases 2025

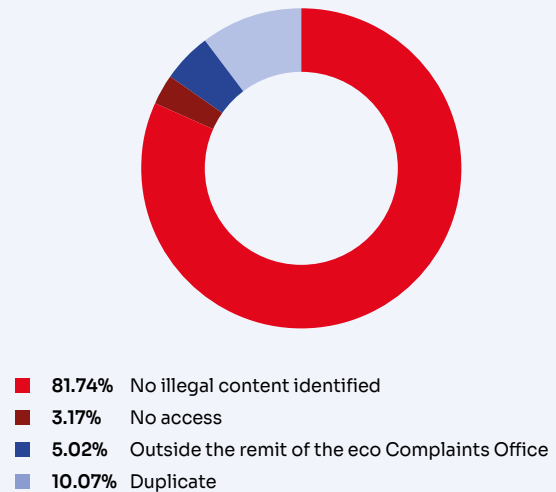


Source: eco Complaints Office, 2026

Just under 42% of the complaints received in 2025 were classified as non-actionable. A complaint is considered non-actionable if the reported content is not legally relevant, falls outside the remit of the eco Complaints Office, cannot be reviewed by the eco Complaints Office due to lack of access, or is a duplicate. Cases are classified as duplicates if they are already known and are being processed at the time of reporting.

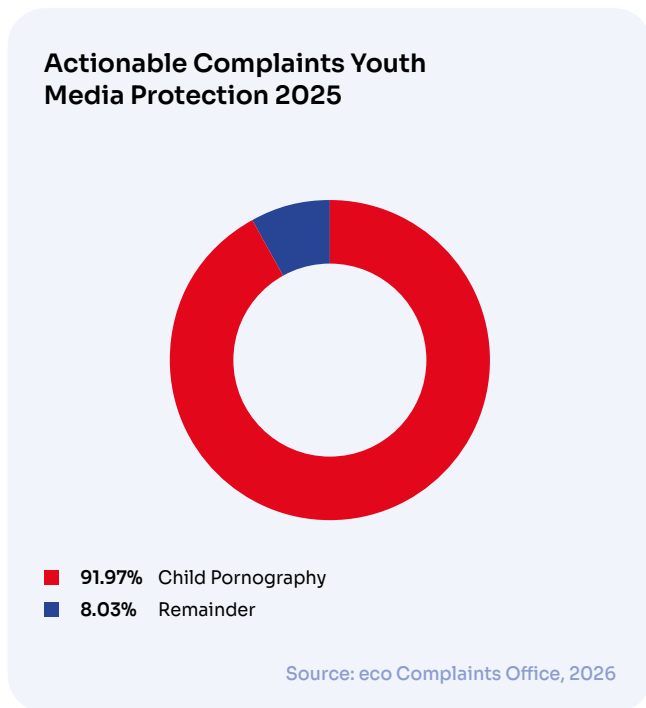
As in previous years, a large proportion of the actionable complaints involved content that is accessible via websites of all kinds (web-based content).

Non-Actionable Complaints 2025



Source: eco Complaints Office, 2026

In terms of content, Child Pornography content – as in previous years – also accounted for the largest share of actionable complaints. Compared to the previous year, an increase of around 1.16 percentage points was recorded for the reporting year.



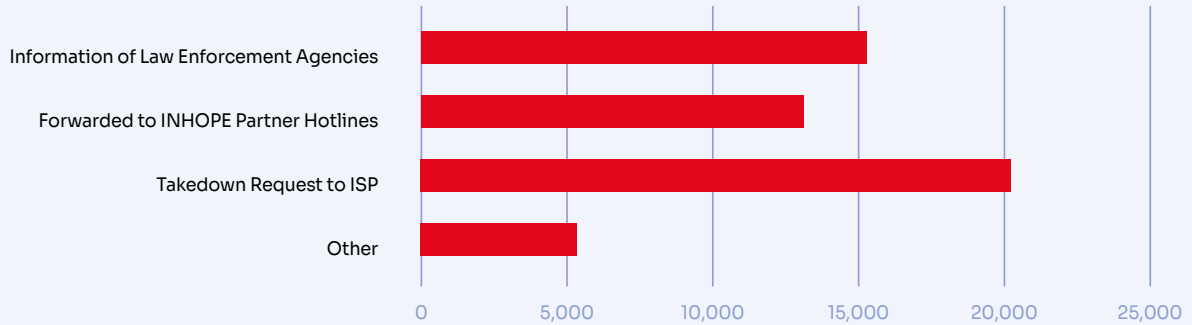
8.03% of actionable complaints concerned types of other content. This category includes a wide range of other offenses: various forms of sexualized violence against children and young people (such as youth pornography, cybergrooming, and violations of the most personal sphere of life, i.e., violations under Section 201a of the German Criminal Code,

anti-constitutional content, depictions of violence, as well as other content that endangers young people and impairs development are summarized in this category. Youth pornography (2,254 cases) accounts for the largest share of other content.

Compared to 2024, the proportion of sexual violence and boundary violations against children and young people (excluding Child Pornography) increased slightly. The proportion of other sexual boundary violations, such as the distribution of adult pornographic, violent, or animal pornography content under Sections 184 and 184a of the German Criminal Code, also rose slightly. In contrast, anti-constitutional content and depictions of violence were somewhat less prevalent in the reporting year than in the previous year. The proportion of other content that is harmful to young people and impairing development remained comparatively low in both years.

Last year, the eco Complaints Office sent a total of 54,052 notifications (in particular to the police, INHOPE partner hotlines, and/or ISPs – with this number not including reminders). In this context, the relatively low proportion of reports sent to the police compared to the number of actionable complaints is attributed to the fact that, in cases of depictions of abuse of children on content hosted abroad, a report is generally only made to the German Federal Criminal Police Office (BKA) if no INHOPE partner hotline exists in the respective country. If, on the other hand, an INHOPE member can be contacted who in turn informs the law enforcement agencies, no report is typically made to the BKA in order to avoid duplication of effort.

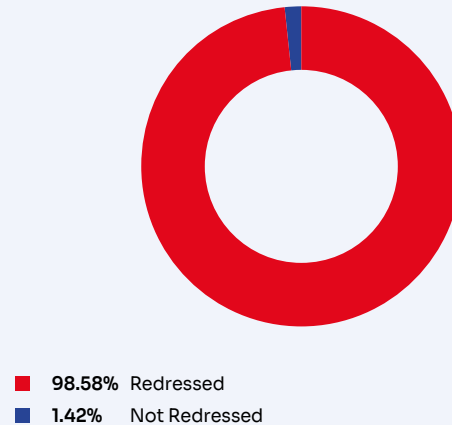
Measures Taken by the eco Complaints Office in 2025



Source: eco Complaints Office, 2026

The consistently high success rate for web-based content remained almost unchanged compared to the previous year: 98.58% of the content reported was taken down or otherwise legalized (for example, through the implementation of age verification systems).

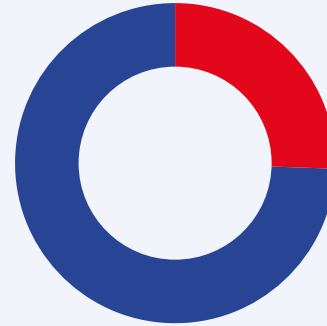
Total Success Rate for Web-Based Content in 2025



Source: eco Complaints Office, 2026

This demonstrates that self-regulation mechanisms within the Internet industry are effective in combatting illegal online content – including internationally. After all, only around one quarter of the reported URLs (25.58%) were hosted in Germany.

Hosting of Web-Based Content 2025



■ 25.58% In Germany
■ 74.42% Outside of Germany

Source: eco Complaints Office, 2026

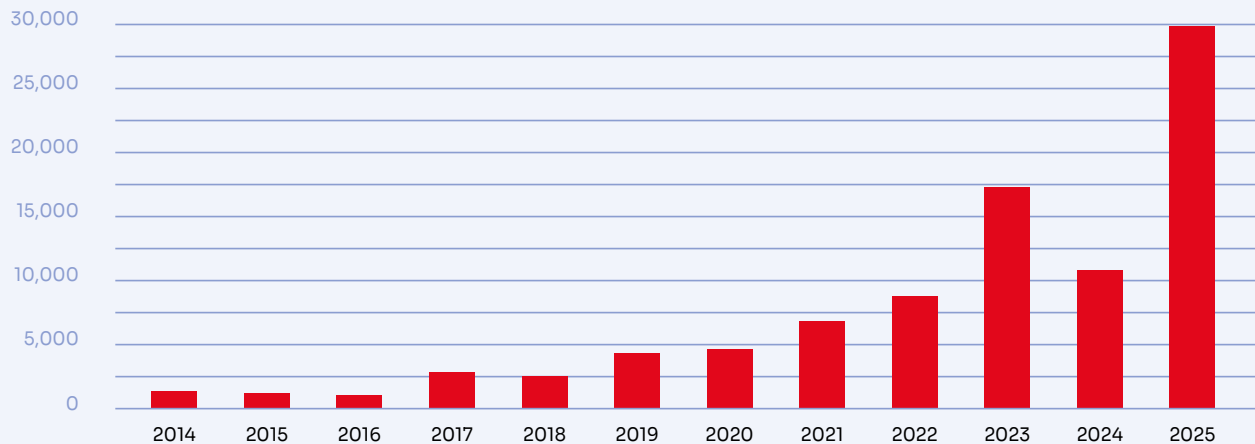
2.3 Details on actionable complaints about sexual violence and boundary violations against children and young people

The eco Complaints Office classifies the following offenses to the category of “sexual violence and boundary violations against children and young people”: child and youth pornographic content, cybergrooming, violation of intimate privacy within the meaning of Section 201a of the German Criminal Code, as well as posing depictions within the

meaning of Section 4 (1) No. 9 of the German Interstate Treaty on the Protection of Minors in the Media.

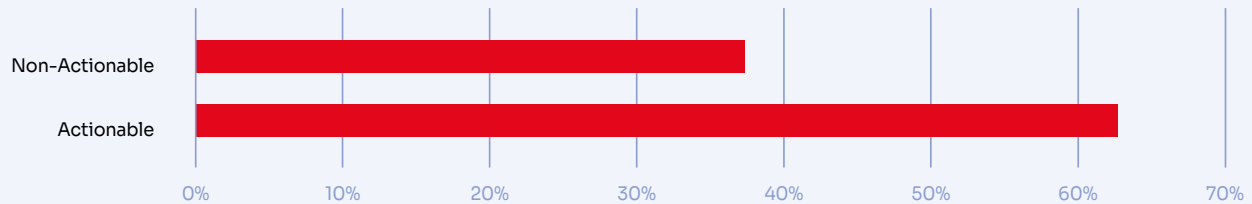
The number of actionable complaints concerning sexual violence and boundary violations against minors almost tripled in 2025 compared to the previous year.

Actionable Cases of Sexualized Violence against Children and Young People – Year-on-Year Comparison



Source: eco Complaints Office, 2026

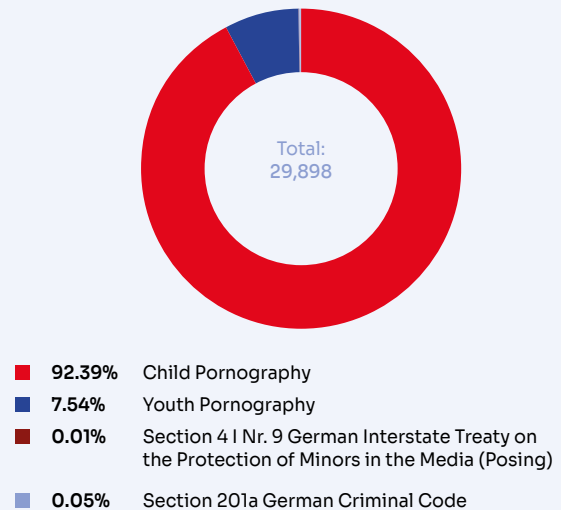
Percentage Share of Actionable Complaints Regarding Sexual Violence and Boundary Violations against Children and Young People 2025



Source: eco Complaints Office, 2026

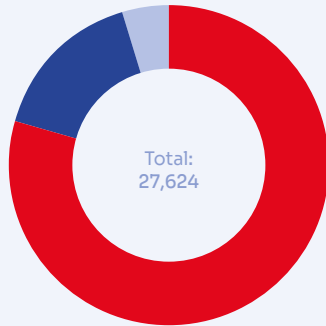
Of the total 29,898 actionable cases in this category, the majority – as in previous years – concerned content that qualified as Child Pornography within the meaning of Section 184b of the German Criminal Code.

Actionable Complaints Regarding Sexual Violence and Boundary Violations Against Children and Young People



Source: eco Complaints Office, 2026

Content Classified as Child Pornography 2025



- **79.53%** Depictions of Sexual Acts Performed on, by, or in the Presence of Children
- **16.01%** Provocative, Sexually Emphasized Body Posture
- **4.46%** Focus on Genitals and Buttocks

Source: eco Complaints Office, 2026

Just over three quarters of the actionable Child Pornography cases in 2025 involved the depictions of sexual acts performed on, by, or in the presence of children.

Youth pornographic content (2,254 cases) accounted for the second largest share of actionable complaints within the overall phenomenon area of “sexual violence and boundary violations against children and young people.”

16.27% of the actionable complaints in the phenomenon area of “sexual violence and boundary violations against children and young people” depicted so-called posing depictions (also referred to as posing).

Posing refers to depictions of minors in unnatural or provocative, sexually emphasized body postures. Under German law, such content may not be distributed online. Depending on the age of the person depicted and the nature of the depiction, posing may constitute either a purely media-law violation (Section 4 (1) No. 9 of the German Interstate Treaty on the Protection of Minors in the Media) or be punishable as child or youth pornography (Sections 184b (1) No. 1b, 184c (1) No. 1b German Criminal Code).

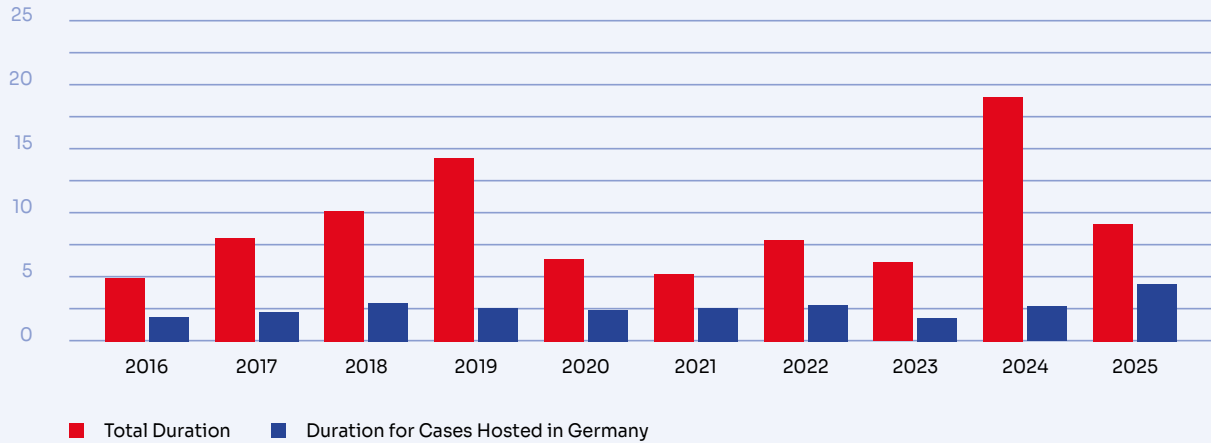
Overall, a total success rate of 99.51% was recorded for Child Pornography (100% for content hosted in Germany). The primary reasons for pending and delayed deletions were primarily due to differences in the legal situation with regard to texts, virtual depictions, and links.

When considering the following figures and graphs on response times, it should be noted that these do not reflect the effective or actual response time of the Internet service provider, but rather the period from the receipt of the report by the eco Complaints Office to the confirmation of takedown by the eco Complaints Office (weekends and public holidays, on which the eco Complaints Office does not operate, are not excluded from the calculation of availability and success rates). The frequency with which the

takedown is verified also has an influence on the recorded response time. The more frequently checks are carried out to determine whether reported content is offline, the more accurate and meaningful the information on response times becomes. The eco Complaints Office strives to check removals on every working day. However, during periods of high complaint volumes, priorities must be set and the focus of work must initially be placed on receiving reports.

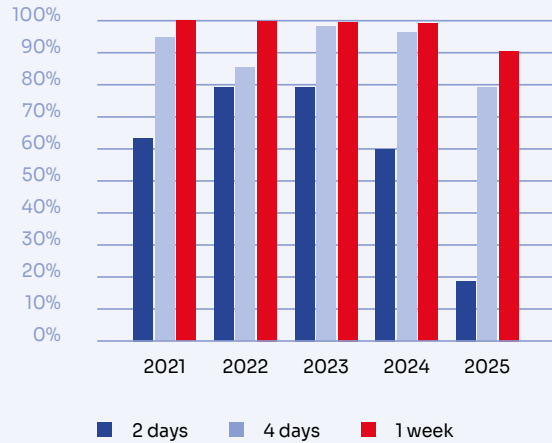
Average Time Until Removal in a 10-Year Comparison (Child Pornography)

Days



Source: eco Complaints Office, 2026

Take-down Rates for Child Pornography (German Cases)



Source: eco Complaints Office, 2026

Take-down Rates for Child Pornography (All Cases)

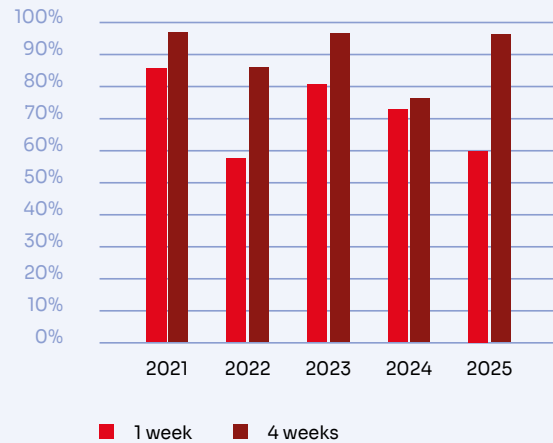


Source: eco Complaints Office, 2026

In the reporting year, websites containing child pornography hosted in Germany were removed (“deleted”) after an average of 4.52 days; worldwide, it took 9.21 days.

The availability times of so-called images of posing for minors did not differ significantly from the availability times for abuse depictions of children, as was already the case in the previous year. Worldwide, it took an average of 10.92 days from the time of reporting to the eco Complaints Office for this content to disappear from the Internet. Content hosted in Germany was no longer available after an average of 4.2 days.

Take-down Rates for Posing Depictions (All Cases)



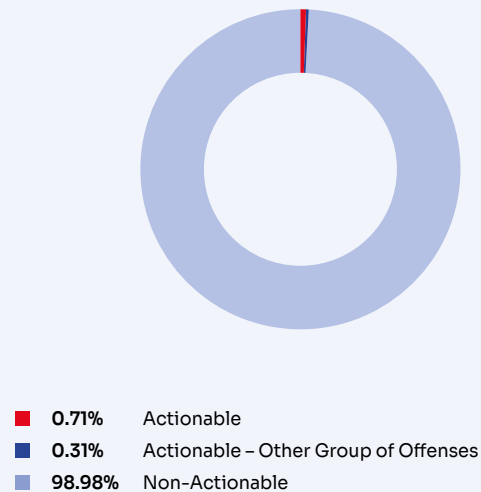
Source: eco Complaints Office, 2026

2.4 Details on actionable complaints about anti-constitutional content

The eco Complaints Office primarily classifies the following offenses as “anti-constitutional content” (in the broad sense): Incitement to hatred (Section 130 German Criminal Code), Dissemination of propaganda material of unconstitutional organizations (Section 86 German Criminal Code), Use of symbols of unconstitutional organizations (Section 86a German Criminal Code), Disparagement of state and denigration of symbols (Section 90a German Criminal Code), Disparagement of constitutional organs (Section 90b German Criminal Code), Forming criminal and terrorist organizations (Sections 129 et seq. German Criminal Code), Revilement of religious faiths (Section 166 German Criminal Code), and Defamation directed at persons in political life (Section 188 German Criminal Code).

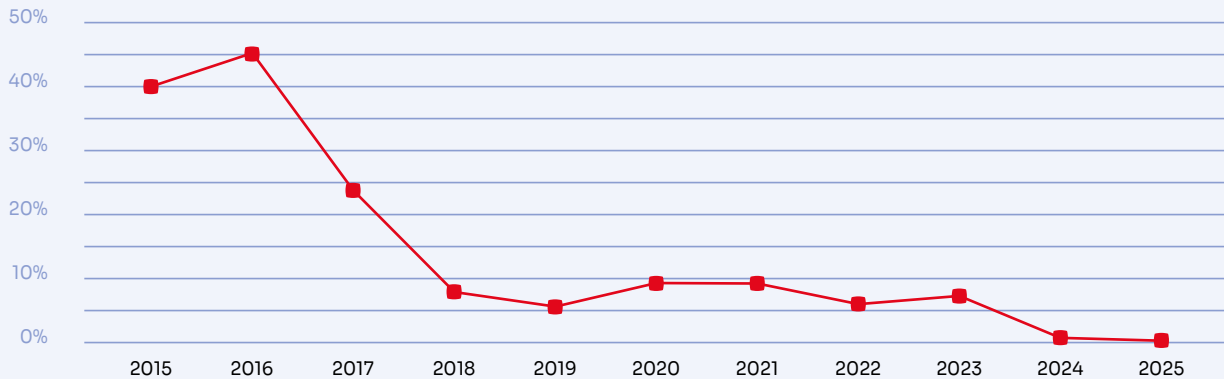
Also in the year 2025, the proportion of actionable complaints in this area of offense was again strikingly low. Of the total of 1,271 reports regarding suspected anti-constitutional content received by the eco Complaints Office in the reporting year, only 0.71% were legally relevant and thus justified. This suggests that there is increased sensitivity within the population toward inflammatory, hateful, or extreme content or statements, while at the same time the sense of justice often does not align with the legal situation. As a result, many of the reports were based on legal misinterpretations by the reporting users and were ultimately protected by freedom of expression and therefore not legally justified.

Percentage of Actionable Complaints About Anti-Constitutional Content 2025



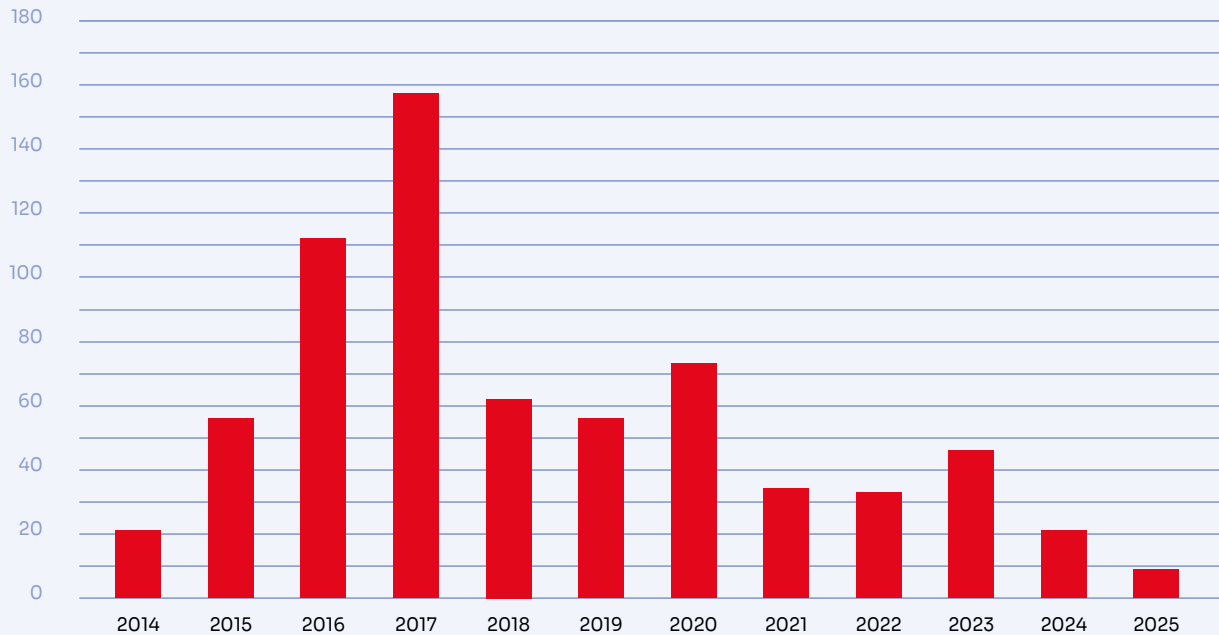
Source: eco Complaints Office, 2026

Percentage of Actionable Complaints About Anti-Constitutional Content – Year-on-Year Comparison



Source: eco Complaints Office, 2026

Ultimately, in the area of “anti-constitutional content,” nine reported items of content were classified as unlawful by the eco Complaints Office. This corresponds to 0.03% of all actionable complaints in 2025, and is therefore once again below the proportion recorded in the previous year.

Actionable Cases Involving Anti-Constitutional Content – Year-on-Year Comparison

Source: eco Complaints Office, 2026

The low proportion of actionable complaints in this area of crime once again makes it clear that the legal thresholds for actual violations are high, particularly due to freedom of expression. Freedom of expression is a fundamental value. A prohibited statement requires more than just a “nasty comment.” This once again demonstrates how important a thorough, and sometimes time-consuming, review of the content is

to ensure that freedom of expression is upheld within the framework of existing laws and that permissible statements are not simply removed because they are considered undesirable.

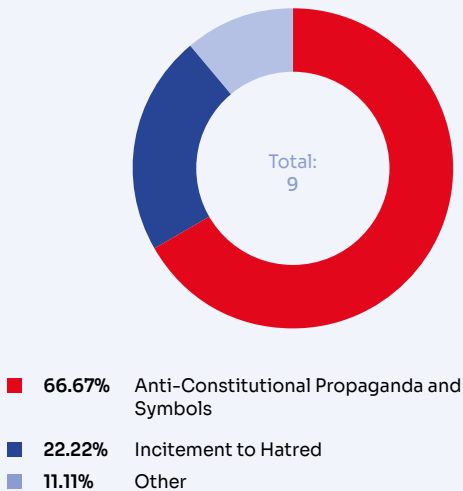
The reported cases, as well as the relevant cases, once again concerned multiple services and service providers.

Due to the very low number of cases in 2025 in the area of “anti-constitutional content,” statistical data is naturally not meaningful.

Nevertheless, for reasons of transparency, a brief overview of the further findings of the eco Complaints Office is provided below:

Two-thirds of the actionable complaints regarding anti-constitutional content concerned anti-constitutional propaganda and symbols. Two cases involved the offense of incitement to hatred. One case involved the public incitement to commit criminal offenses.

Distribution of Offenses in Actionable Complaints About Anti-Constitutional Content 2025



Source: eco Complaints Office, 2026

One-third of the anti-constitutional content that the eco Complaints Office flagged was removed.

It should be emphasized at this point that only one-third of the content complained about was hosted in Germany. In contrast to depictions of the sexual abuse of children, content that promotes incitement to hatred or other anti-constitutional content is not equally condemned worldwide. The legal situations vary widely in terms of their fundamental principles. Nevertheless, success (= remediation) can also be recorded in cases hosted abroad, when host providers are informed of the situation and are able to take appropriate measures on the basis of their own terms and conditions.

From a procedural standpoint, it should be noted that the eco Complaints Office must observe a longer waiting period between reports to the police and to the ISP (3 working days). In addition, complaints regarding sexual violence and boundary violations against minors are treated as a priority, as there is always the possibility that the law enforcement agencies will be able to identify the victim or perpetrator, thereby preventing further abuse.

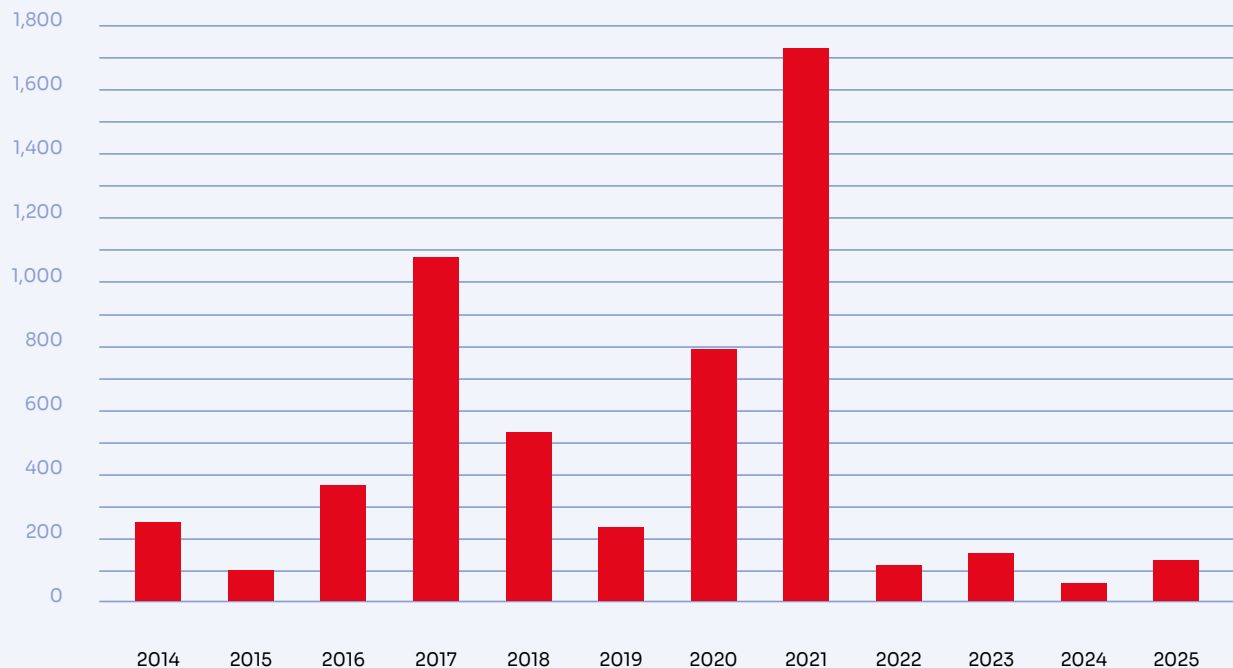
2.5 Details on actionable complaints regarding youth media protection

In the area of “other youth media protection,” the eco Complaints Office primarily groups the following offenses: dissemination of extreme depictions of violence, freely accessible adult pornography, animal and violent pornography, as well as other content endangering youth and impairing development within the meaning of the German Interstate Treaty on the Protection of Minors in the Media that is not

already covered in the categories “sexual violence and boundary violations against children and young people” or “anti-constitutional content.”

In the reporting year, the eco Complaints Office identified 128 cases of “other youth media protection.” This corresponds to a share of 5.38% of the reports received in this category.

Actionable Cases Involving Other Content – Year-on-Year Comparison



Source: eco Complaints Office, 2026

Due to the low number of cases, statistical data here are also naturally of limited significance. Nevertheless, for reasons of transparency, a brief overview of the further findings of the eco Complaints Office is provided below:

Around 10% of the content complained about was hosted in Germany. Overall, remediation was achieved in around one-third of the cases objected to.

2.6 Challenges in complaints handling

The challenges involved in processing reports are multifaceted.

From a technical viewpoint it is important to emphasize that in 2025 – as in previous years – obfuscation tactics were used in the dissemination of illegal material. The aim of these tactics is to enable only a certain group of people to access the prohibited content, while at the same time making it more difficult for others (such as hotlines, law enforcement officers, etc.) to directly access this prohibited content.

What is not uncommon is that depictions of sexual violence and boundary violations against minors are only accessible with a so-called referrer. Here, users must come from a specific “source” site, which refers across through a link. The “destination” page tracks where users are coming from and shows different content, depending on the request. A more complex, but comparable, method triggers this technical path-setting through the use of cookies. In this scenario, users can only access the content in question if the specifically defined cookie file recognized by a browser is present on their computer, which may, in turn, have been created by a previously visited page. In both cases, different content is displayed depending on the digital path followed or simulated. Technically, these processes can be simulated using particular tools.

In some cases, access to content for certain user IPs or locations (e.g., entire countries) is blocked from the operator side and/or appears to be unavailable for access from these IPs or locations. In such instances,

reported content can, for example, only be accessed by using a proxy server or VPN service.

The involvement of Content Delivery Networks (CDNs) also makes it more difficult to process cases. In such cases, an inquiry must be made at the CDN to identify the host provider, which means an additional step in the processing of the report (both during initial processing and as part of the availability check before a reminder is sent). Fortunately, there is usually a speedy response through the CDN. Occasionally, explanations to the recipient also require a notification that a CDN is involved.

When processing complaints about content distributed via so-called file hosting services (mostly videos), reviewing this content was also more time-consuming. The design of some services that host third-party content can also significantly slow down the review process – for example, some image hosting services offer the provision of (all types of) content free of charge, but users must first solve elaborate captchas or dismiss multiple advertising pop-ups before accessing the content.

Furthermore, some content was only accessible with a so-called premium account. The affected platform operators did not always provide us with a corresponding account free of charge.

In 2025, in a few isolated cases, the eco Complaints Office also found that disseminators of illegal content transferred their content to another hosting provider,

especially after take-down by the original provider. In some cases, they also transferred the content to hosting countries where there is not yet an INHOPE partner hotline. To some extent, this made it more difficult to make contact and submit requests for take-down.

In general, there were only a few host providers from outside of Germany who consistently ignored notifications from us (and other hotlines) and requests for take-down, or who were extremely slow to implement them, regardless of the content.

Legally complex matters are sometimes reported, which can prolong the processing time for reports.

The legal assessment of anti-constitutional content is often challenging and complex, as it requires a precise distinction between permissible content and inadmissible statements in order not to unlawfully restrict the right to freedom of expression. If a statement can be interpreted in different ways, this must be taken into account in the legal assessment. In addition, some elements of an offense, such as “disruption of public peace,” are so-called undefined legal terms, i.e., terms whose interpretation and application require evaluation.

As a general principle, expressions of opinion are permitted as long as they do not violate the rights of third parties or endanger public safety and order. All statements must therefore be interpreted in light of the freedom of expression, especially when it comes to criminal law.

In the case of incitement to hatred (“Volksverhetzung”), for example, this specifically concerns statements that incite hatred or violence against certain groups. The problem in the legal assessment of such

statements often lies in distinguishing between provocative but permissible opinions and targeted, inflammatory statements. As such, any assessments must always strike a balance between protecting public order and the preservation of freedom of expression. In addition, content is sometimes reported in which certain coded terms are used in connection with the Holocaust or anti-constitutional statements. This also makes case processing complex.

Differing legal frameworks across countries present a further challenge. Divergent legal situations frequently lead to an increased communication effort with providers before the removal of the flagged content can be achieved. Such differences exist not only with regard to expressions of opinion and youth media protection – such as extreme depictions of violence or animal pornography – but even in the area of sexualized violence against children and adolescents, for example in relation to posing depictions, virtual or text-based child pornography, and cases involving links to abuse depictions.

In addition, in some cases it was challenging to distinguish between the various constituent elements of the offense of Child Pornography as defined in Section 184b of the German Criminal Code. This also applies to the boundary between Child Pornography and other relevant regulations in the area of depictions of sexual violence and boundary violations against minors.

Last but not least, there are always a lot of mass reports, which are very time-consuming to process. These are characterized by the fact that instead of a steady stream of complaints, a large number of URLs are reported in a single batch, sometimes numbering in the thousands.

2.7 Complaints about unwanted advertising emails

When processing complaints about the unauthorized sending of advertising emails and newsletters, the eco Complaints Office also follows a self-regulatory approach. The senders of the relevant emails are informed of the legal requirements for permissible email marketing and asked to comply with them. Where appropriate, it may also be necessary to contact the provider used to send the emails, who can then take further action – for example, in cases involving spam sent via botnets or senders who are not directly identifiable.

For complaints about the unauthorized sending of advertising emails and newsletters that involve a sender certified by eco under the Certified Senders Alliance (CSA) framework, a more intensive complaint-handling process takes place. If requested by the complainant, a full examination of the facts takes place (particularly regarding data collection), and in the event of violations of CSA regulations, measures are implemented to ensure that future email distribution complies with the rules.

In the reporting year, the eco Complaints Office received a total of 257,765 complaints about unsolicited advertising emails, which represents roughly one-fifth fewer complaints than in the previous year.

The background is a solid red color. It features several thin, dark red lines that intersect at various points. There are four small, dark red square dots placed at some of these intersection points. The lines and dots create a network-like pattern across the slide.

3. Network & Cooperations

eco



Working together against illegal web content – and for the Good of the Internet

National and international partner(ships)

The effective combatting of illegal Internet content is a task for society as a whole and requires good collaboration between all actors in accordance with their specific options for action. Moreover, the Internet knows no state borders. For hotlines to work effectively, it is therefore also important for them to be well connected worldwide. For this reason, the eco Complaints Office works at both the national and international levels together with a large number of parties, relies on cooperation, and engages in committees and initiatives. In this chapter, we introduce important partners in the fight against illegal Internet content and share an overview of our diverse network activities in 2025.

INHOPE (www.inhope.org)

In November 1999, eco – alongside seven other organizations and with support from the European Commission’s “Action plan on promoting safer use of the Internet” – founded the International Association of Internet Hotlines (INHOPE). For over 25 years, the international network has been successfully working to effectively combat depictions of the abuse of minors.

INHOPE is the international umbrella association of Internet hotlines which operate worldwide and accept complaints about illegal online content, with a particular focus on child sexual abuse material (CSAM). Since its founding, the network has grown to include 57 member hotlines across six continents. Complaints concerning illegal Internet content can thus be forwarded to the relevant responsible partner through the cooperation of the hotlines. In this way, the illegal content is investigated in its respective country of origin, which is also advantageous for criminal prosecution. If reported illegal online content is not located on a server in Germany, the eco Complaints Office informs the responsible INHOPE member in the particular case involved.

This cooperation has proven its worth: Through its members, the INHOPE network covers many countries where depictions of the sexual abuse and sexual exploitation of minors are hosted. The rapid and secure exchange of information across national borders has also led to the breaking up of numerous child sexual abuse rings.

INHOPE itself is not a hotline, but supports the collaboration of the member hotlines in the individual countries. Among other tasks, the umbrella organization sets minimum standards for the processing of complaints and the exchange of reports on the depictions of the sexual abuse and sexual exploitation of minors within the INHOPE network, and offers regular training for the staff of the member hotlines.

Among other activities, INHOPE coordinates the (further) development of the “Universal Classification Schema,” a classification system for assessing depictions of the sexual abuse and sexual exploitation of minors. The “Universal Classification Scheme” is intended to provide hotlines, law enforcement agencies, and service providers with a standardized, descriptive means of categorizing (“labeling”) such content. A “translation” of the labels describing the content into legal categories – in view of differing legal situations internationally – can then enable a (criminal) legal assessment of the content for each participating country. Among other things, this is intended to allow prioritization in the processing of reports. eco contributes to the further development of the “Universal Classification Schema” through participation in the associated Expert Council by Sebastian Fitting, Senior Consultant at the eco Complaints Office.

The eco Complaints Office regularly participates in the exchange of knowledge and experience within the network, including direct exchanges with partner hotlines. During the reporting year, the eco Complaints Office visited colleagues in Luxembourg and welcomed a Portuguese colleague as part of the INHOPE Peer-to-Peer Program.

→ Since November 2024, Sebastian Fitting, Senior Consultant at the eco Complaints Office, has been a member of the INHOPE Board.

INHOPE

German Safer Internet Centre (saferinternet.de)

Reporting, advising, raising awareness – these are three important strands for the positive online experience of young Internet users and for combatting illegal Internet content. As such, eco, FSM, jugendschutz.net, Nummer gegen Kummer, and the State Media Authority of Rhineland-Palatinate have been working together as the German Safer Internet Centre since 2008.

Since as far back as 2004, together with the German Association for Voluntary Self-Regulation of Digital Media Service Providers (FSM), eco has been operating the portal internet-beschwerdestelle.de/ in order to offer users a joint point of contact for reports of illegal Internet content, as well as to provide further information and links to advisors.

Also last year, this commitment continued as part of the German Safer Internet Centre.

As in previous years, joint activities to raise public awareness were again carried out within the consortium. On Safer Internet Day, the partners of the German Safer Internet Centre pooled their expertise and organized a joint webinar entitled “No Likes for Lies: What Can Be Done About Populist and Extremist (Deep) Fakes on the Internet? – What Professionals and Parents Need to Know!” In front of around 400 participants, experts from the Safer Internet DE network provided information on the challenges and options for dealing with populist and extremist (deep) fakes online. Legal aspects were also addressed, including the assessment of content in the context of applicable laws and possible legal steps against the spread of disinformation.

On the occasion of the European Day on the Protection of Children Against Sexual Exploitation and Sexual Abuse on 18 November 2024, the hotlines of eco, FSM, and jugendschutz.net hosted an online event entitled “Together Against Sexualized Violence Online – What Professionals Need to Know.” This webinar had a very large response and reach with around 400 participants.

In 2025, the German Safer Internet Centre once again received financial support from the European Union under the “Digital Europe Programme.” The partners of the Safer Internet Centre intend to continue this cooperation and have therefore submitted another application for continued funding in autumn 2025.



Cooperation with law enforcement agencies

Criminal prosecution is a key element for combatting illegal Internet content. For this reason, in its complaint processing, eco works to ensure that illegal content is taken down and that criminal offenses are reported. The eco Complaints Office also cooperates with law enforcement agencies at both the federal and state levels in undertaking work over and above complaint processing.

In the fight against depictions of the sexual abuse of children, close and effective cooperation with the German Federal Criminal Police Office (BKA) takes place, with this also reflected in the German federal government's report on the success of removal Child Pornographic web content. The most recent report, published in June 2025, once again showed that the principle of "take-down instead of blocking" and the collaboration of the hotlines, the BKA, and the German Federal Agency for the Protection of Minors in the Media (BzKJ) present very effective means for combatting illegal Internet content. In addition, the collaboration with the BKA includes regular exchange meetings and a written cooperation agreement between the hotlines (eco, FSM, jugendschutz.net), the BKA, and the BzKJ.

In the area of state security offenses, the eco Complaints Office cooperates with police authorities and public prosecutor offices at both the federal and state levels. Since 2019, eco has also been a member of the North Rhine-Westphalia initiative, "Prosecute, don't just delete," and thereby actively supports the rigorous criminal prosecution of hate speech on the Internet. In addition to a regular exchange on hate postings and their legal assessment, the

initiative also enables a coordinated and optimized procedure for transferring criminal charges to the Central Bureau and Contact Office for Cybercrime North Rhine-Westphalia (ZAC NRW) of the Cologne Public Prosecutor's Office, which specializes in this area. The partners of the initiative also exchanged experiences and developments in the relevant area of crime in 2025, for example within the framework of "digital lunch breaks."

In addition, the eco Complaints Office cooperates closely with the police at the local level. The collaboration with the Cologne Police in 2025 is particularly worth mentioning. Based on a cooperation agreement, joint events were held, for example in connection with the annual Safer Internet Day or in connection with the so-called Cologne Prevention Talks.

German Federal Agency for the Protection of Minors in the Media (BzKJ)

The German Federal Agency for the Protection of Minors in the Media (BzKJ) is a key player in ensuring and further developing youth media protection and a long-standing network partner of the eco Complaints Office. BzKJ and the eco Complaints Office work together in partnership in various areas and at different levels. This applies, for example, cooperation within the framework of the BKA partnership. In addition, employees of the eco Complaints Office have for many years been appointed as associate members of the Federal Review Board for Media Harmful to Minors and contribute to the BzKJ's decisions on the indexing of such media. Furthermore, the eco Complaints Office is part of the partner network of the German Federal Office for the Enforcement of Children's Rights in Digital Services (KidD), which was founded in 2024. Although KidD is based at the BzKJ, it operates independently as part of the supervision of the Digital Services Act (DSA). The good and trusting cooperation with the KidD is of great importance to us, as it demonstrates how effective child and youth media protection can be achieved in practice through constructive dialogue between regulators and industry.

In the reporting year, representatives of the eco Complaints Office participated in the BzKJ's "Future Workshop" on the topic of "Sexual Violence and Harassment in the Digital Space." In addition, Kira Peek, Senior Consultant at the eco Complaints Office, attended the joint event organized by KidD and ECPAT Germany e. V. on the topic of "Sexualized Violence Against Minors Online." Furthermore, an exchange meeting with KidD took place at the eco Complaints Office.

Collaboration on youth media protection with other relevant actors

In 2025, the eco Complaints Office continued its exchange and collaboration with other relevant actors in the field of youth media protection. The following activities are particularly noteworthy:

In continuing to build on the work of previous years, the eco Complaints Office extended its collaboration on common and specific topics with the State Media Authority of North Rhine-Westphalia (LfM) and other supervisory bodies. The eco Complaints Office also cooperated with the LfM as part of the initiative “Prosecute, don’t just delete.”

For the eco Complaints Office, the Entertainment Software Self-Regulation Body (USK) – due to its many years of experience in the area of youth media protection – is also an important exchange and contact partner in its general scope, both in general matters and in individual cases. Since 2019, Sebastian Fitting, Senior Consultant at the eco Complaints Office, has also been active in assessment committees as youth protection experts for USK.online.

fragFINN e. V., of which eco is also a founding member, has been offering a protected surfing space for children for more than an impressive fifteen years. This is based on a so-called positive list for Internet sites suitable for children. This positive list has been developed by fragFINN and is regularly checked by experienced media pedagogues. The “**fragFINN.de**” portal provides children with, among other things, a search engine that makes it easier for them to access websites that are designed to be safe for children. Among other forms of assistance, eco supports fragFINN through participation in its

Criteria Working Group. Participation in the working group enables the members of fragFINN to play an active role in shaping the positive list specifications, as well as facilitating a regular information exchange on developments and trends. Here, too, fragFINN benefits from its membership structure, as the various fields of expertise and competencies guarantee a three-dimensional protected space on the Internet, one that can respond immediately to new developments.

In 2025, “priority flagging” was also an essential element of the eco Complaints Office’s effective work. The collaborations in this area with special reporting channels for trustworthy notifiers enable direct interaction between hotlines and providers, which simultaneously has a positive effect on reaction times.

Since 2022, the eco Complaints Office has also been a member of the City of Cologne’s Expert Group on the Prevention of Extremism. The eco Complaints Office also actively supported this expert group in the year under review and took part in its annual network meeting.

Promoting media skills

Media education is a major challenge and responsibility. The adults responsible for this often come up against their own limits. Due to the fast-moving pace of the social networks and messaging services, knowing how to use and handle these is not always easy, especially for children and young people. This is why the eco Complaints Office makes itself available for both parents' evenings and teacher training courses, in order to raise awareness among people of legal risks and thus promote the positive use of all online services. In addition, the eco Complaints Office offers its own digital event formats.

In the year under review, the State Prevention Unit Against Violence and Cyber Violence for Schools in North Rhine-Westphalia was an important cooperation partner of the eco Complaints Office. In close collaboration with the State Prevention Unit and the Cologne Police, the eco Complaints Office conducted a webinar expert discussion on the occasion of Safer Internet Day 2025 on the topic of "What to Do When Children and Young People Send Nude Images? – What Educational Professionals Should Know," providing legal guidance and confidence in dealing with cases of unwanted distribution of nude images. Additionally, Sebastian Fitting, Senior Consultant at the eco Complaints Office, participated in the annual network meeting "Violence Prevention in North Rhine-Westphalia" organized by the State Prevention Office.

Since December 2018, the eco Complaints Office has also been a network partner of the "s.i.n.us" project, "Safely Underway with the Internet." This is an association of institutions in the Rhine District of Neuss involving schools, parents, police, youth

welfare, and addiction support services. The aim of the joint project is to promote the media skills of pupils, teachers, and parents – for example, on the basis of further training opportunities. Kira Peek, Senior Consultant at the eco Complaints Office, took part in the annual network meeting and, as part of this cooperative work, delivered a presentation at the principals' meeting of all primary schools in Neuss on the topic "Handling Criminal Content on Students' Devices."

In addition, Bianca Gründer, Consultant at the eco Complaints Office, conducted a workshop on the topic of "Sexualized Violence Against Children and Young People on the Internet: Legal Foundations & Recommendations for Action" as part of the "Media Competence Framework NRW on Site" organized by the Regional Education Network, the Media Advisors, and the Media Center Neuss – in collaboration with the Media Advisory Service NRW.

Special partnerships of the eco Complaints Office

For the eco Complaints Office, collaboration with the association's companies and other partners is essential. This applies to combatting illegal Internet content in processing the reports, as well as the further activities of the eco Complaints Office. Each actor has specific options for action, interests or responsibilities. Together, they can act effectively and make a significant difference. In other words: "Together for the Good of the Internet!" In order to be able to strengthen or further develop activities and to simultaneously provide additional support to members of the association and other companies or organizations in their various activities and interests, the eco Complaints Office has therefore developed the "For the Good of the Internet" partnership model (<https://international.eco.de/topics/policy-law/eco-complaints-office/partnership-with-the-eco-complaints-office/>).

In addition, the eco Complaints Office maintains partnerships with other companies and organizations. During the reporting year, a new cooperation was established with DENIC e. G. (www.denic.de), the registration authority for .de domains, which is intended as an ongoing collaboration. This cooperation includes regular exchanges regarding reports of youth-protection-related content on .de domains, as well as the integration of a dedicated reporting form on the DENIC website for notifications of such content. These notifications are received and processed as complaints by the eco Complaints Office. The background and objective of this cooperation are to ensure that reports of youth media protection on .de domains can be addressed promptly and in accordance with the applicable liability framework.

Online Youth Protection for Companies

Extra benefits for member companies: Youth protection has always been an important part of the eco Complaints Office's assessment standard. The eco

Complaints Office was established on the initiative of our member companies in 1996 and can now look back on almost 30 years of expertise in this field.

- **Legal Expertise**

The eco Complaints Office offers a considerable alleviation to the day-to-day work of member companies of the eco Association; for example, through initial legal assessments of reports concerning illegal content. This allows complaints that are non-actionable to be filtered out so that providers do not have to deal with them.

- **Close to politics**

As part of the Policy, Law & Regulations division, the eco Complaints Office accompanies and monitors political issues and legislative processes at national and international levels and actively brings its expertise and many years of experience to bear on these processes. The eco Complaints Office works closely with political stakeholders, monitors processes, and immediately recognizes and reacts to new developments in the field of youth media protection.

- **Network of experts and committee work**

The eco Complaints Office represents an important voice on the subject of youth protection in all of its facets: Years of successful collaboration with law enforcement agencies, providers, partner hotlines, and actors in the field of youth media protection, not to mention the active support of national and international committees and initiatives, has made the eco Complaints Office the ideal mediator between the industry and state bodies.

- **Lasting offers for eco Association members**

In addition to the full legal qualifications of our staff, who assess online content and any measures to be taken, member companies profit for 30 years of expertise in the field of youth media protection. A contribution is made by separate services of the eco Complaints Office, which are offered independently of the general complaint work service.

Youth Media Protection Expert Lunch

With the “Youth Media Protection Expert Lunch,” the eco Complaints Office offers an open forum targeted exclusively at association members active and interested in the field of youth media protection, with the aims of exchanging experiences and gathering information. Two meetings are scheduled to take place each year, with additional relevant parties and external experts sometimes also invited to contribute. In addition, teleconferences and online meetings will be offered on specific occasions if information or coordination is required in the short-term. The following are the focal topics of our Youth Media Protection Expert Lunch:

- The application of the German Interstate Treaty on the Protection of Minors in the Media and the corresponding regulations in the German Criminal Code
- Legal developments in youth media protection in its broadest sense
- “Digital trends”
- The activities of the eco Complaints Office

During the reporting year, we met at Google in Berlin to discuss current developments regarding age verification and the age of media use. Michael Terhörst (KidD) contributed to the meeting as an external expert.

eco Youth Protection Officer Service

The Youth Protection Officers have the following functions:

- Advisory service for the provider
- Contact person for users
- Point of contact for official oversight

Youth protection on the Internet is a task for society as a whole. With the eco Youth Protection Officer Service, association members in particular have the opportunity to make their contribution to this cause. Certain telemedia providers with content that is developmentally impairing or youth-endangering, as well as providers of search engines, may also be obliged to appoint a Youth Protection Officer in accordance with Section 7 of the German Interstate Treaty on the Protection of Minors in the Media.

With the eco Youth Protection Officer Service, the eco Complaints Office provides comprehensive support to telemedia providers in fulfilling this obligation or in the voluntary appointment of a Youth Protection Officer. It offers the following functions and benefits:

- Comprehensive consultation on matters relating to youth protection
- A neutral point of contact between telemedia providers and their users
- The minimization of liability risk
- Prevention of official fines and written warnings
- An increase in user trust through effective youth protection
- Current information and updates on developments, and legal changes in the area of youth media protection
- A service tailored to the type of provider
- A seal of quality/logo for websites

→ If you are interested in availing of or finding out more about this service, we'd be happy to hear from you at the following email address jugendschutzbeauftragte@eco.de

An abstract geometric pattern consisting of several intersecting lines and dots. The lines are thin and dark, creating a network of triangles and other shapes. Three dots are placed at specific intersection points. The background is a solid, vibrant red.

4. Insights into Committee Work, Events, Politics, and Media Response

eco



Committee work, events, and monitoring of political issues

In 2025, the eco Complaints Office continued its active involvement in numerous events, activities, and committees at both national and international levels in order to advocate for efficient measures and

procedures in combatting illegal Internet content, as well as for effective and practical youth media protection, while also presenting the work of the eco Complaints Office.

The following activities are particularly noteworthy for the reporting year:

Cologne Prevention Talks, Cologne Adult Education Center (Volkshochschule Köln)

As part of the City of Cologne's Expert Group on Extremism Prevention, the eco Complaints Office was once again involved in the "Cologne Prevention Talks" series at the Cologne Adult Education Center during the reporting year. Together with the Cologne Police, Sebastian Fitting, Senior Consultant at the eco Complaints Office, held two evening events (27.01.2025 and 13.11.2025) to inform parents, educational professionals, and other interested participants about online risks, the legal framework for assessing online content, and specific courses of action.

Children and Youth Media Protection Conference of the State of "Mecklenburg-Vorpommern," Greifswald

At the invitation of the Ministry of Education and Daycare Facilities for Children of "Mecklenburg-Vorpommern," Kira Peek, Senior Consultant at the eco Complaints Office, led a workshop on 07.10.2025 at the Children and Youth Media Protection Conference of the State of "Mecklenburg-Vorpommern" in Greifswald, Germany. Under the title "Pornography Meets Resilience – Positively Supporting Digital Youth Environments," the workshop provided current impulses for contemporary child and youth media protection. The workshop "Handling Criminal Content on Students' Devices" addressed the legal foundations for dealing in particular with child and youth pornography, questions of criminal responsibility, and schools' obligations to act. The aim of the workshop was to provide educational staff with legal guidance and practical certainty in everyday school settings, while also highlighting preventive approaches for dealing with such incidents.

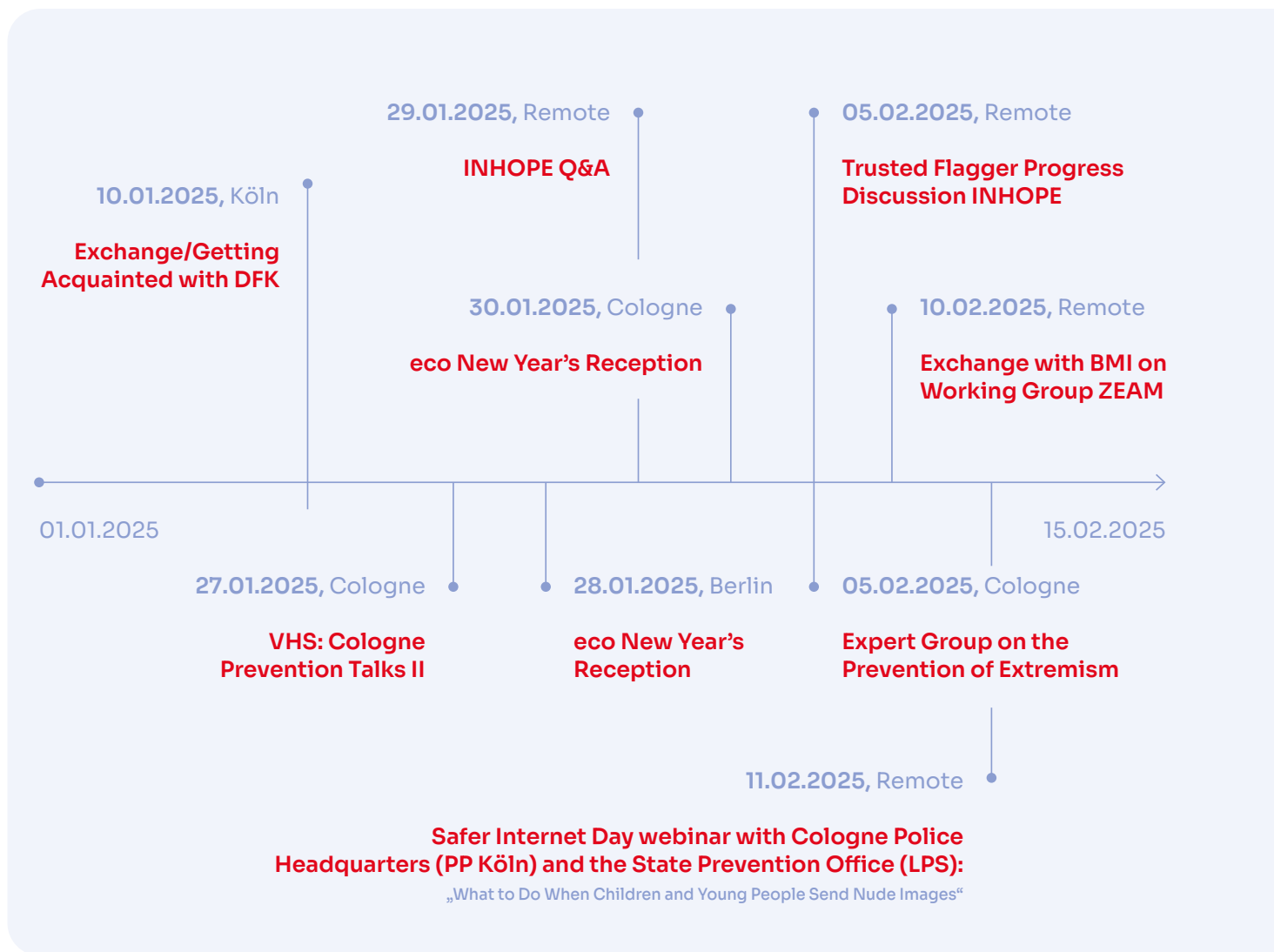
Events in the Context of Youth Media Protection and the DSA

In 2025, the protection of children and young people in the digital space continued to be strongly shaped by the implementation of the Digital Services Act (DSA), in particular the provisions of Article 28 and the guidelines published by the European Commission. The specification of platform-side due diligence obligations, age-appropriate design, and risk-based protective measures increasingly became the focus of policymakers, regulators, and providers. The eco Complaints Office actively accompanied these developments through participation in EU-level consultations, expert exchanges, and attendance at relevant dialogue formats. These activities included, among others, a webinar hosted by Google and YouTube on the DSA guidelines relating to Article 28, in which practical implementation issues relating to the protection of minors on platforms were discussed. As part of the eco Digital Workshop in Berlin, the Head of the eco Complaints Office, Alexandra Koch-Skiba, engaged in an exchange with Google on the topic of “Digital Responsibility in Times of Fake News, Hate Speech, and More,” addressing questions of platform regulation, the handling of problematic but not necessarily illegal content, as well as existing corporate measures and regulatory frameworks.

In addition, the eco Complaints Office participated in the think tank of the German Federal Commissioner for Data Protection and Freedom of Information (BfDI) on the DSA in Berlin, contributing its perspectives from its complaint-handling practice to the discussion.

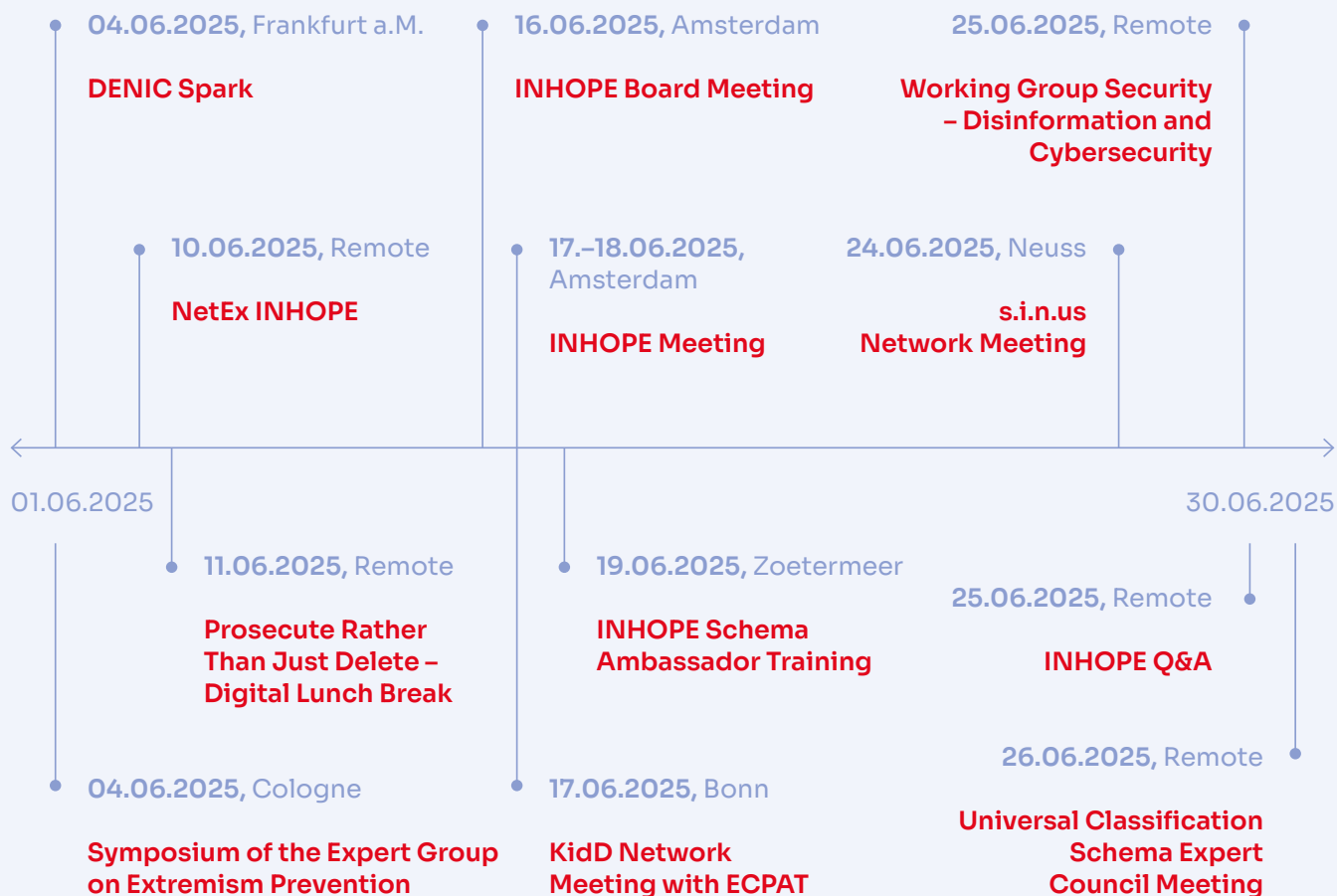
EuroISPA: Content Moderation Committee

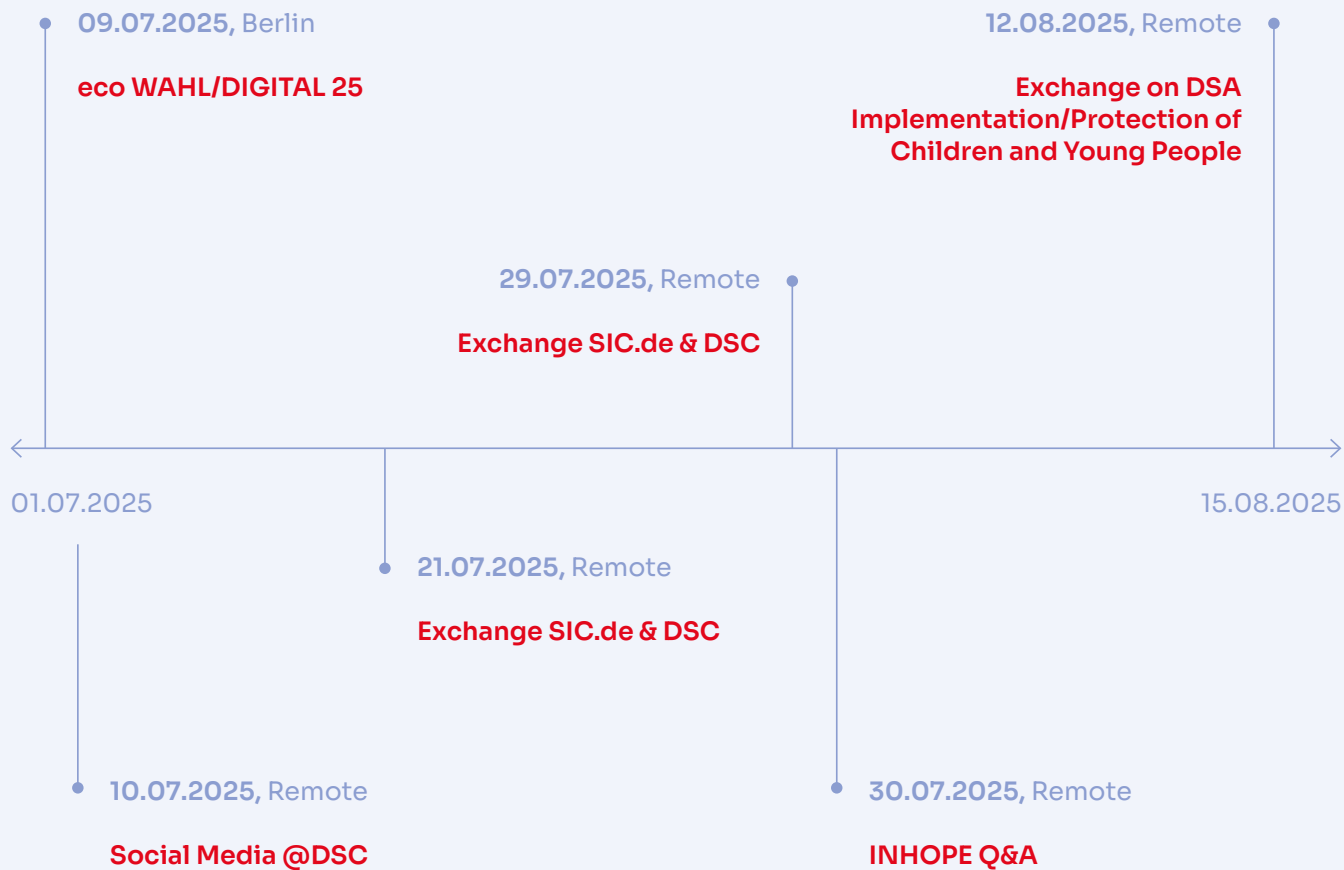
Through participation in virtual EuroISPA meetings on 18.03.2025, 15.05.2025, and 17.11.2025 on the topic of content moderation, the eco Complaints Office – represented by the Head of the Complaints Office, Alexandra Koch-Skiba – actively followed political and regulatory developments at the European level concerning the combatting of illegal and harmful online content. Plans by the European Commission for a new legal framework in the area of “abuse depictions” also formed a key topic in 2025. In addition, the eco Complaints Office shared its own practical experience in combatting such content with EuroISPA members and provided information on regulatory developments and perspectives in Germany. Another important topic was the implementation of the provisions of the Digital Services Act (DSA) on youth media protection, in particular the EU Commission’s guidelines on Article 28 DSA and the associated issue of age verification of Internet users.

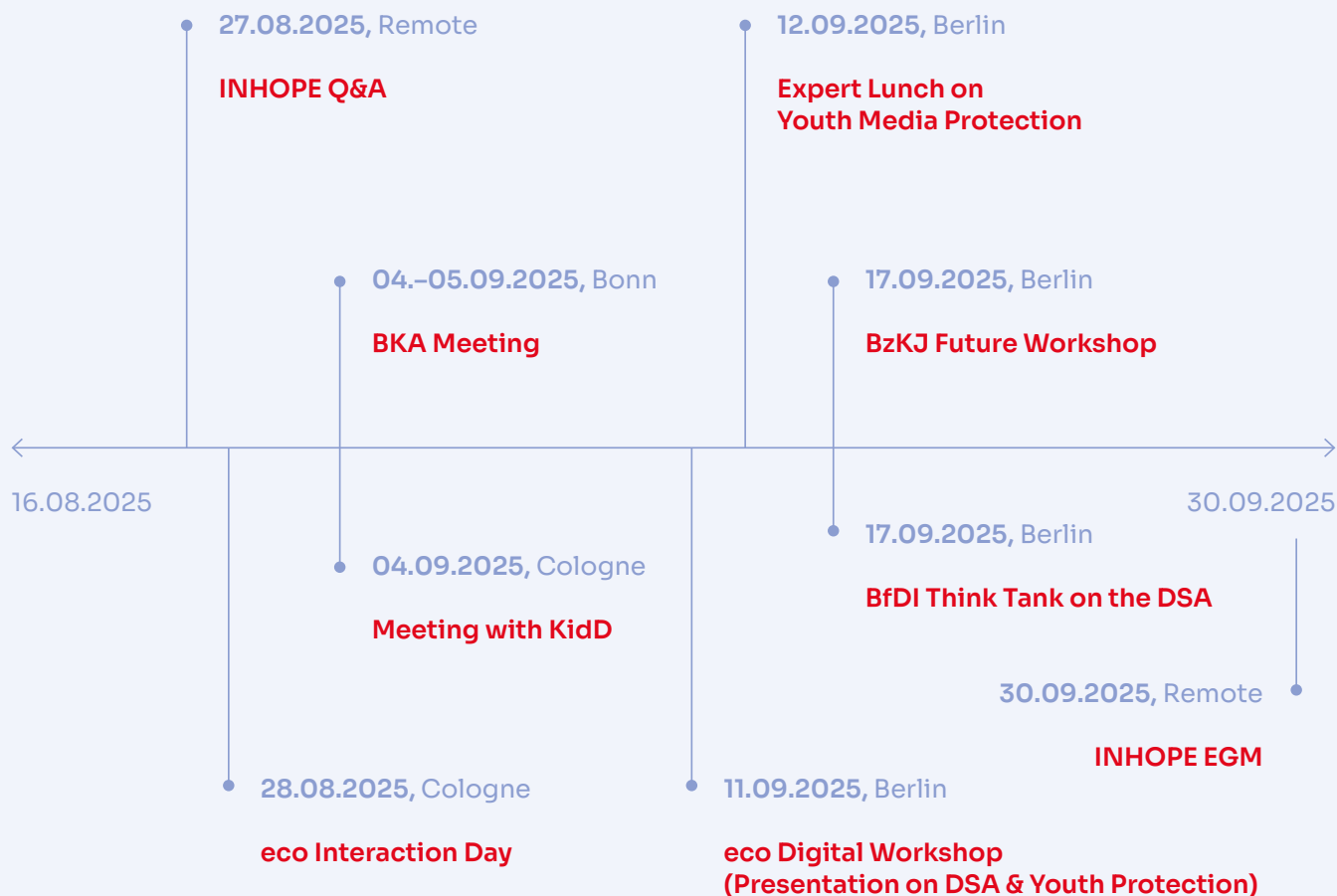


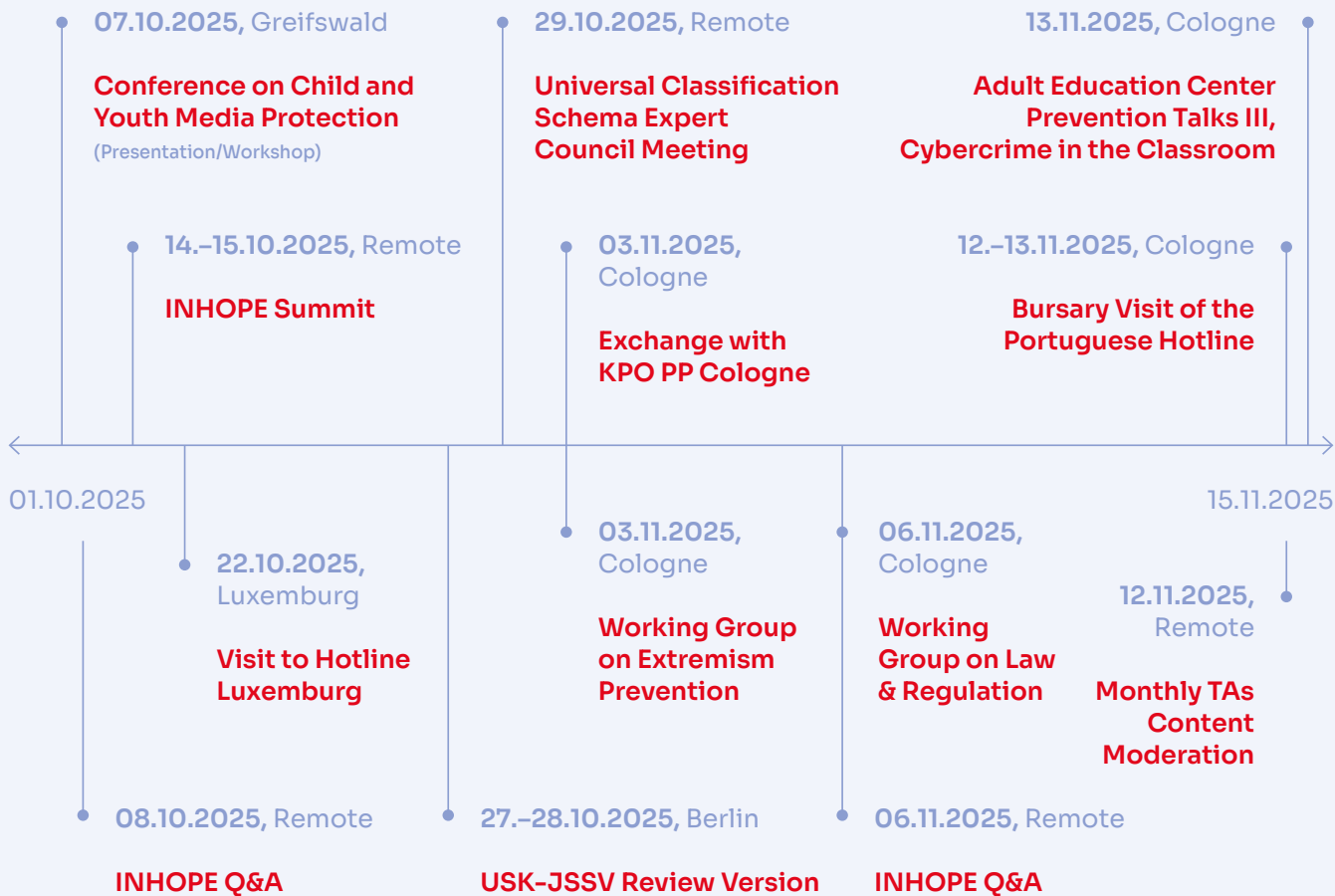














CSAM Regulation

From a regulatory perspective, the European Commission's proposal for a regulation on preventing and combatting child sexual abuse (CSAM Regulation) remained the central topic for the eco Complaints Office in 2025. In addition to introducing new obligations for providers (in particular for providers of hosting services or interpersonal communication services), the regulation envisages the establishment of so-called competent coordinating authorities in the Member States, as well as a so-called EU Centre. The establishment of new, specific institutions may have an impact on the work and network of established hotlines. Due to the "impact" on member companies and established hotlines, this European legislative initiative is therefore of particular importance for eco both as an industry association and as an operator of a hotline.

The political discourse on how to handle the proposed regulation took place primarily at the level of the European Council during the reporting year. The focus was on the question of a detection obligation, including in encrypted online services. This discourse was accompanied by a range of PR activities and the co-signing of so-called "joint letters." In this context, eco consistently called for refraining from imposing a comprehensive detection obligation and emphasized that encryption technologies must not be weakened. In addition, eco repeatedly emphasized the importance of incorporating existing structures and cooperative arrangements into the new regulatory framework.

Network Blocking in the Interstate Treaty on Gambling

During the reporting year, the issue of network blocking once again came into focus for media oversight bodies and regulatory authorities as a means of tackling unlawful online offerings. In addition to the application of existing legal provisions, it is worth noting that the federal states are examining and planning an extension of network blocking in the area of unauthorized online gambling.

The eco Complaints Office has contributed to this discourse and, in line with the principle of "take-down instead of blocking," reminded stakeholders in statements and other publications that network blocking is not an effective means of addressing illegal Internet content. It was also stressed that the liability framework of the DSA and the strict subsidiarity it entails with regard to the involvement of internet access services must be taken into account.

Public Relations and Media Coverage 2025

In 2025, the eco Complaints Office continued to accompany political developments and societal issues through intensive public relations activities across various channels, contributing to discussions on key policy debates while also providing insights into its work and sharing its expertise in a practical manner.

In addition to established communication occasions such as Safer Internet Day (11.02.2025), the German Federal Government's removal report (18.06.2025), the publication of the annual report, and the "European Day for the Protection of Children against Sexual Exploitation and Sexual Abuse" (18.11.2025), the ongoing debate surrounding the European CSAM Regulation once again formed the central focus of public communications during the reporting year. The implementation of the Digital Services Act (DSA) was also addressed. During the reporting year, the question of age restrictions for the use of digital services by children and young people also became a topic of public debate.

In collaboration with the market and opinion research institute YouGov, the eco Complaints Office published two representative population surveys – one on protective measures when posting photos of children online, and another that surveyed public opinion on the introduction of a minimum age for social networks.

In total, the eco Complaints Office published ten press releases, one podcast episode, and six policy statements, while also supporting its PR activities through the association's social media channels and newsletters.

In terms of content, the focus was on topics such as legal criticism of the CSAM Regulation, measures for youth media protection, the promotion of media literacy, and the role of hotlines in the effective removal of illegal content.

A tablet is shown on a wooden surface, displaying a social media post. The post is titled 'Kleines Team, große Aufgabe' (Small team, big task) and features a grid of various app icons. To the right of the tablet is a black mug. The background is a dark, textured surface.





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Süddeutsche Zeitung DOSSIER

Digitale Medien Gesellschaft Events Über SZ Dossier

Startseite > Digitalisierung > Briefing vom 03. Dezember 2025

Obamas Ex-Cyberberater im Interview

Samstag, 10. Dezember 2025 | Lesedauer: 44 Min.

Gabriel Bräutigam
Sprecher Digitalisierung

Mit Miriam Dattlinger, Laurenz Gehrike und Bastian Minkling

Guten Morgen. Ab heute gilt in Australien das weltweit erste Social-Media-Verbot für Unter-16-Jährige. Wie wichtig wird das?

Süddeutsche Zeitung DOSSIER

Digitale Medien Gesellschaft Events Über SZ Dossier

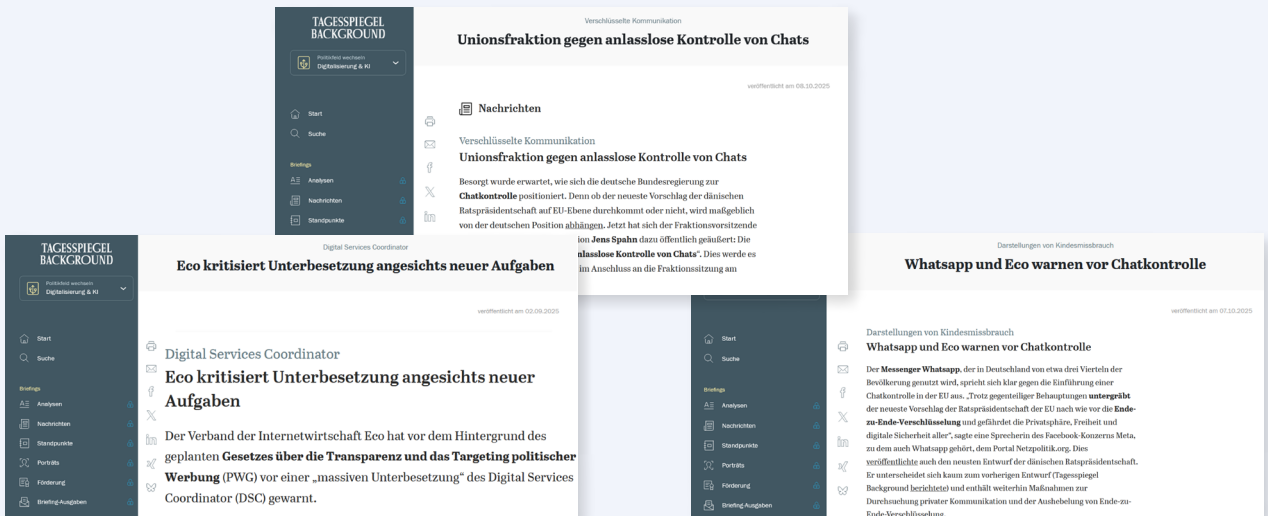
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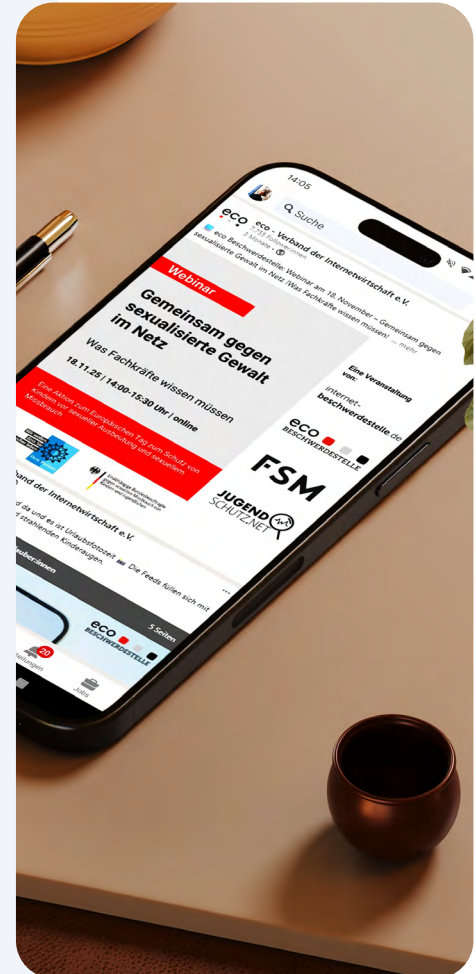
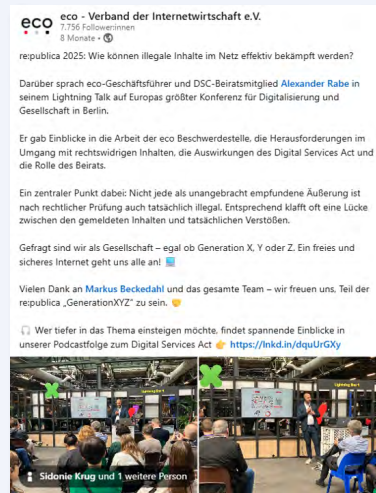
Eco-Verband rät Eltern zu klaren Regeln für Social Media

Mittwoch, 10. Dezember 2025

Obamas Ex-Cyberberater im Interview

Von Gabriel Bräutigam, Miriam Dattlinger, Laurenz Gehrike und Bastian Minkling





5. Outlook



Digital media and digital communication have become an integral part of our everyday lives. They are simply part of our daily reality. This also applies to children and young people – whether for learning, accessing information, and entertainment, or staying in touch with friends and family, to name just a few examples.

At the same time, digital media and digital communication are constantly evolving. This continually raises the question of how the protection of young people can be ensured in a contemporary manner without curtailing their participation in society.

The question of contemporary youth media protection and the appropriate handling of illegal Internet content is currently the subject of intense debate in politics and society. It is important for us not to lose sight of the fact that youth media protection is based on three pillars: participation, protection, and empowerment. On the one hand, these form a triad of equally important building blocks; on the other hand, they exist in a certain area of tension with one another and therefore require careful balancing.

With regard to this triad of participation, protection, and empowerment, the work of the eco Complaints Office plays an important role as part of systems of self-monitoring and self-regulation. The consistently high volume of complaints in the area of sexualized violence against children and young people, combined with high success rates, clearly underscores this.

The year 2026 marks an anniversary year for the eco Complaints Office: for three decades we have been committed to a safe and responsible digital space. Together with eco members and network partners, we work internationally to combat illegal Internet content and promote a positive online experience – particularly for young Internet users. Our experience and expertise from the past three decades support us in addressing current and future challenges, particularly in the technical and procedural development of complaint handling, the active shaping of legal and regulatory processes, and international cooperation.

Our experience also shows that promoting a safe and respectful digital environment is essential. A central priority therefore remains the strengthening of media

literacy – among children and young people as well as among adults, particularly parents, teachers, and educational professionals. This includes not only critically examining information, recognizing risks, acting responsibly, using digital services safely, and reflecting on one's own media use, but also conveying legal fundamentals and practical options for responding to problematic content.

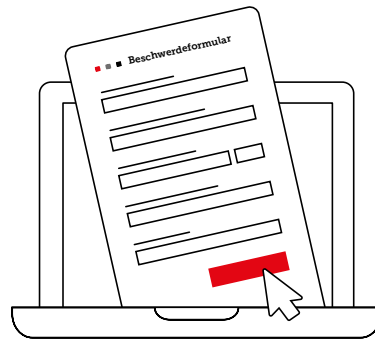
Looking ahead, we will continue to campaign against illegal online content and to strengthen media literacy. In doing so, we will continue to contribute our expertise to political and regulatory processes and continue to promote and encourage dialogue on issues relating to the protection of youth media protection among companies, policymakers, and other relevant stakeholders.

What can you do?

Every report counts in the fight against illegal content! If you come across content online that you believe is illegal, don't hesitate: Report it to the eco Complaints Office – simply and anonymously at:



complaints-office.eco.de





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Publisher

eco – Association of the Internet Industry
Lichtstrasse 43 h, 50825 Cologne, Germany

Phone +49 (0) 221 / 700 048-0

Fax +49 (0) 221 / 700 048-111

info@eco.de

international.eco.de

Managing Directors: Alexander Rabe, Andreas Weiss

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