

**eco**     
COMPLAINTS OFFICE

**Annual Report 2022**

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## Foreword Lisa Paus, Member of the German Bundestag, German Federal Minister for Family Affairs, Senior Citizens, Women and Youth

### Dear Readers,

Whether it's to do with the fight against hate and incitement on the Internet or against fake news: the work undertaken by the eco Complaints Office helps to achieve better youth media protection. What is of particular importance is the Complaints Office's work on handling complaints concerning sexualized violence against children. In its battle against cybergrooming and the dissemination of depictions of sexualized violence against children, the Complaints Office is an important ally for the German Federal Ministry for Youth.

As a minister responsible for children and youth, one of my top priorities is naturally the fight to combat sexualized violence against children. This issue must be addressed at many levels. It has recently been underscored by the EU Commission's proposal for a regulation to combat child sexual abuse. A uniform approach throughout Europe is very important here – child protection is the priority!

I firmly advocate strengthening prevention and holding providers accountable for doing their part in protecting

children and young people. Many of the eco Association's member companies are conscious of this responsibility. Help and complaint systems contribute to having children and young people feel safer online.

I would like to thank the Complaints Office for its vital work and tireless dedication. I look forward to our continuing to work together – for better protection of children and young people in the digital sphere.

Yours sincerely,

**Lisa Paus, Member of the German Bundestag**  
German Federal Minister for Family Affairs, Senior  
Citizens, Women and Youth



## Modern youth media protection requires dedication from society as a whole

### Dear Readers,

Time and again, companies, policymakers, the media, and society in general ask themselves what is needed for good and modern youth media protection. It is clear that there is no one single approach or solution. With all of its facets, youth media protection is and remains a task for society as a whole and consists of many elements.

Through our activities at the eco Complaints Office, we have been making an active stand against prohibited Internet content for more than 25 years. Each and every day, we receive reports regarding depictions of sexual abuse or about anti-constitutional or other content relevant to criminal law or youth protection. On the strength of our own practical work and experience, we are aware of the challenges in dealing with reports on such content. We are also in regular contact with network partners and political stakeholders.

Everything revolves around the question of how we can make the Internet of tomorrow a little better, together with all of the stakeholders involved. In 2022, the cornerstone of our activities was once again our dedication and experience in taking down illegal Internet content. In this context, we are naturally always dependent on the receipt of complaints and external reporting. In February

2023, we commissioned a representative survey from the market and opinion research institute Civey to find out what matters most to Internet users when it comes to reporting critical content to a complaints office (on an international level also known as a hotline). According to the survey, 46.0 percent consider it crucial to ensure that the perpetrators are prosecuted, while 40.9 percent want illegal content to be taken down from the Internet as quickly as possible. 28.5 percent want the possibility of anonymous reporting; for 27.0 percent, it is important that the complaint is examined by independent lawyers; and for another 24.6 percent, a transparent process for reporting and dealing with the complaint is essential.

We are pleased that we are able to fulfil all of the criteria that the population wishes a hotline to undertake in combatting illegal content.

In concrete terms, the annual report clearly shows how well we succeeded in this work in 2022: With 8,904 actionable cases, we reached a new peak, which amounted to an increase of about 3.4 percent. Once again, depictions of sexualized violence against children made up the majority of these complaints. This shows how our society is keenly aware that content harmful to children and young people and other illegal content must not be tolerated. We would like to thank all complainants –

anyone who reports such content actively contributes to its take-down and criminal proceedings!

The close cooperation with our network partners led once again to important achievements in 2022: Websites hosted in Germany with content still referred to in legal terms as Child Pornography – that is, depictions of sexual abuse – were taken down 100.0 percent of the time and within an average of around 2.8 days. Globally, such content was removed in about a week and with an overall success rate of 98.5 percent. This underscores just how important the work of the hotlines is and that the principle of take-down instead of blocking continues to work very effectively. As part of further legislative debates, we would be pleased if the key work of the hotlines were to be more clearly taken into account and accorded more weight in an important planned European legislation, the so-called CSAM Regulation.

As a society, we must also continue to act in unison to ensure that hatred and distrust have no place on the Internet, and to campaign at all levels for modern youth media protection. We will therefore also actively pursue our dedicated approach, alongside the processing of complaints.

I look forward to further cooperation, exchange and joint activities!



**Alexandra Koch-Skiba**

Attorney-at-Law, Head of eco Complaints Office

# 1. eco Complaints Office: Who we are and what we do

## Dedicated to combatting illegal content on the Internet

The eco Complaints Office ([complaints-office.eco.de](https://complaints-office.eco.de)) has been fighting illegal content on the Internet since 1996. It is embedded in the system of regulated self-regulation and has, in particular, the task of improving and promoting youth protection on the Internet.

The Complaints Office team is composed of eight employees with a legal background, with these including the Head of the Complaints Office, four Consultants, and three Content Analysts.

Internet users can make a free and anonymous report on youth-endangering and prohibited content at [complaints-office.eco.de](https://complaints-office.eco.de) or <https://www.internet-beschwerdestelle.de/en/index.html> (a joint portal operated by eco and FSM), or can contact the eco Complaints Office via email at [hotline@eco.de](mailto:hotline@eco.de).

In addition, in 2022 the eco Complaints Office was

once again a partner of the information platform for young people, [jugend.support](https://jugend.support), and continues to process reports submitted there together with the FSM and jugendschutz.net hotlines.

In order to effectively fight illegal online content, cooperation 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), an international network that supports hotlines worldwide. In addition, eco is part of the German Safer Internet Centre.

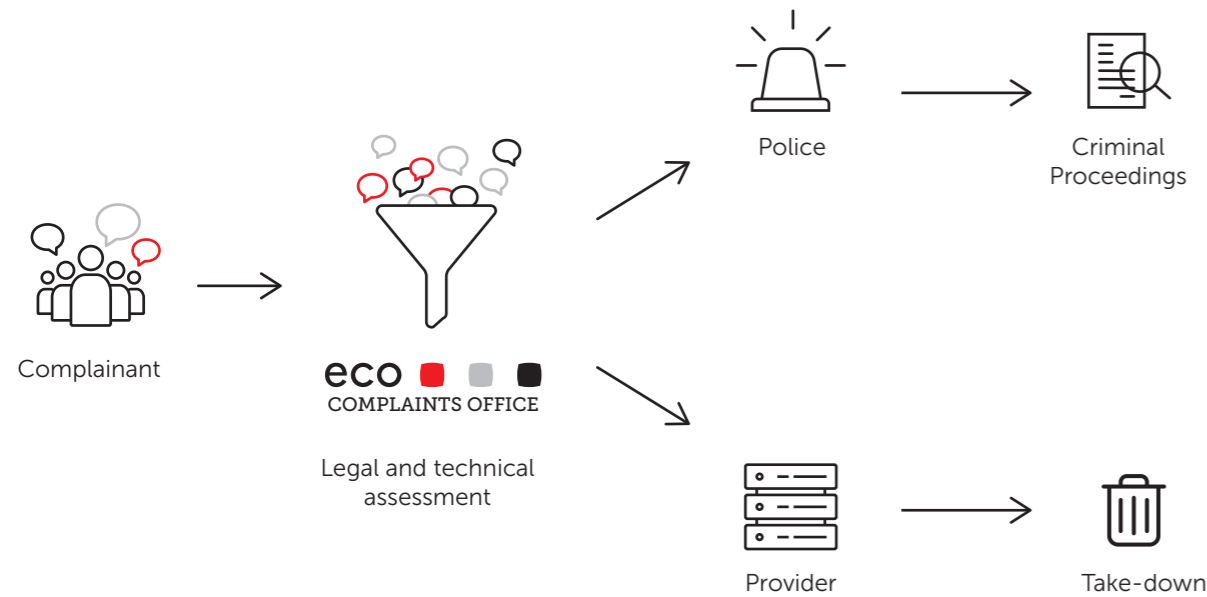
In all of this, the eco Complaints Office serves as a model for neutral and transparent processes and acts as the contact partner for association members, the state, society and politics.

## 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, chats, newsgroups, discussion forums and mobile content. The content can be hosted on servers

either within or outside of Germany (the home country of the eco Complaints Office) and can be reported by all Internet users. The provision of personal data is optional, which also allows a report to be made anonymously.

### Report illegal Internet content to the eco Complaints Office



This infographic gives a simplified representation of the processing of German cases

## 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 (JMStV), youth-endangering and developmentally impairing content, and the corresponding criminal regulations:
  - Section 184 et seq. German Criminal Code (StGB), freely accessible adult pornography, pornography depicting violence, animals, children or juveniles
  - Section 86, 86a StGB, dissemination of symbols and propaganda material of unconstitutional organizations
  - Section 130 StGB, incitement of the masses
  - Section 130a StGB, attempting to cause the commission of offenses
  - Section 131 StGB, depictions of extreme violence

- Section 176b StGB, grooming
- Section 201a StGB, dissemination of naked images of minors for profit
- Section 111 StGB, public incitement to crime

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

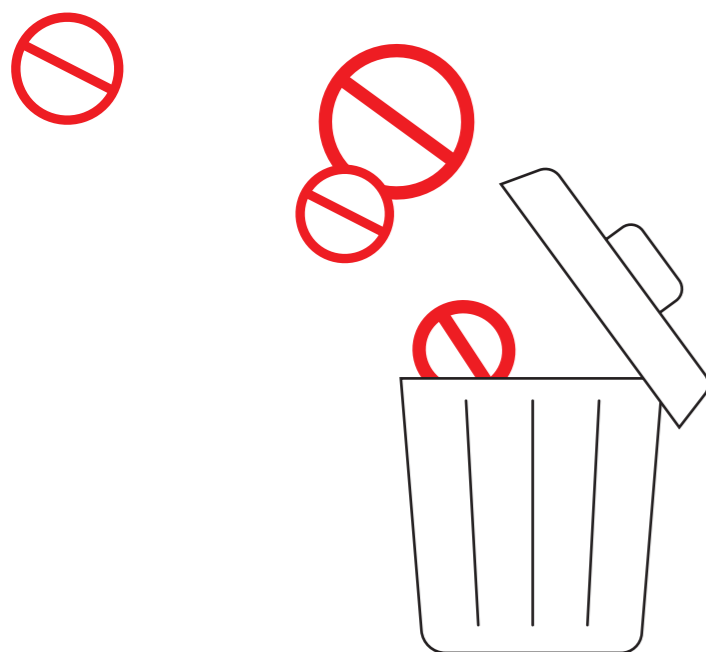
Here you can find further information and definitions of the various offenses:

[go.eco.de/Legalbasis\\_ComplaintsOffice\\_2022](https://go.eco.de/Legalbasis_ComplaintsOffice_2022)

### 1.3 “Take-down instead of blocking”: Self-regulation rather than Internet censorship

In the fight against prohibited web content, the take-down of content from the Internet 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, almost 98.0 percent of the content reported by the eco Complaints Office was removed – worldwide. A detailed presentation of the success rates and reaction times can be found in Chapter [2.2](#) to [2.4](#).



### 1.4 Measures taken by the eco Complaints Office

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 that the hosting provider makes the relevant data available to the law enforcement agency on request and takes 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 take the content down (disconnect). 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 the given content is punishable internationally or is subject to universal jurisdiction 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.

On each working day, the eco Complaints Office monitors any continued availability of the reported content. If necessary, the provider will be asked again to remove or legalize the reported content.

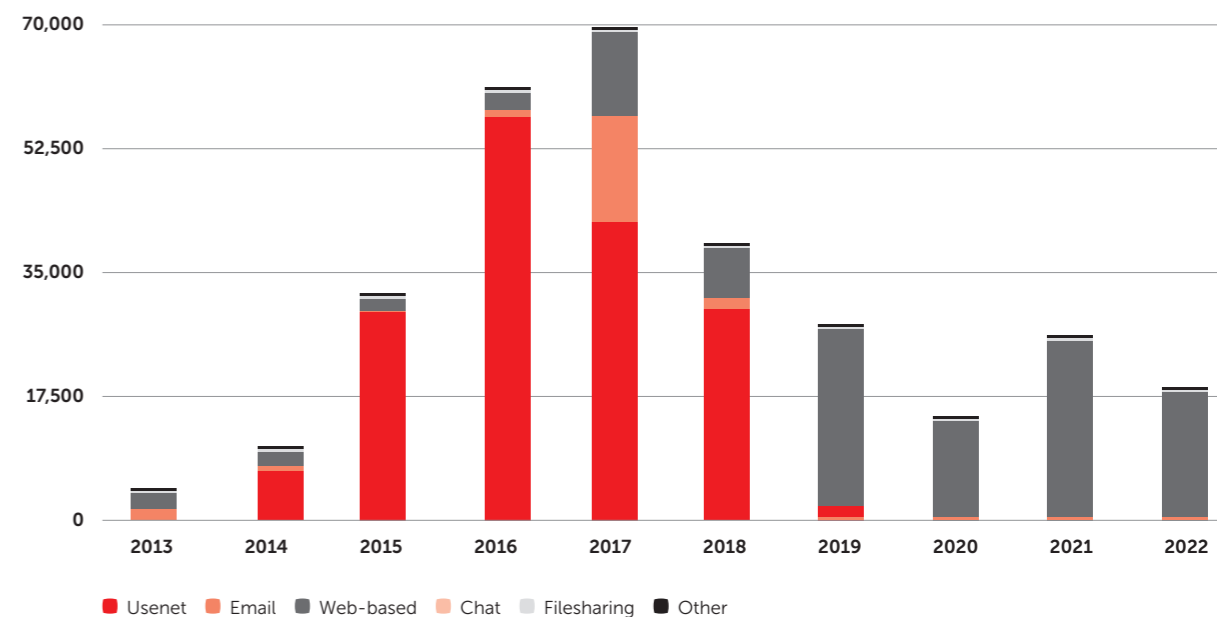
Complainants who have provided a return address will be briefly informed of the outcome of the legal assessment.

# 2. Complaints 2022: Facts and Figures

## 2.1 Number of complaints and measures taken in 2022 in the field of youth media protection

In the year under review, the eco Complaints Office received a total of 18,110 complaints based on potentially criminal content or content relevant to youth media protection.

Growth in Numbers of Complaints in the Field of Youth Media Protection



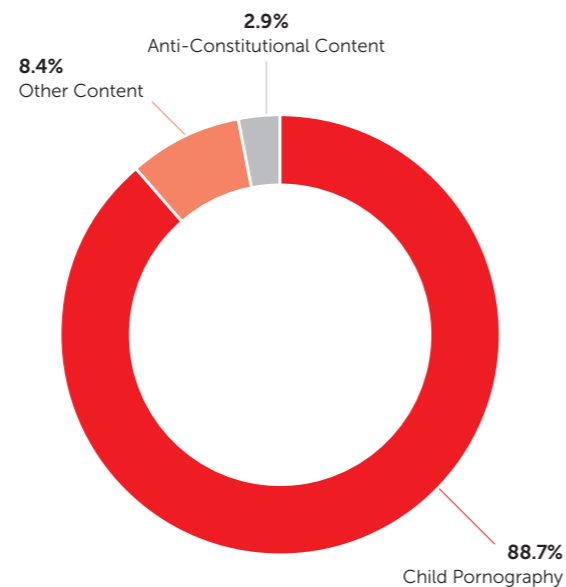
Source: eco Complaints Office, 2023



As in previous years, a large proportion of the complaints received (16,308 cases) concerned depictions of the sexual abuse and sexual exploitation of minors. In particular, these involved depictions that were legally classified as Child Pornography\* as defined in Section 184b of the Criminal Code. With regard to reports of anti-constitutional content, after a decline in complaints in the two previous years, there was once again a significant increase in reports in the year under review (519 cases). Reports on freely accessible adult pornography (76 cases) and so-called developmentally impairing content (75 cases) decreased significantly compared to the previous year.

Close to half of the complaints received in the reporting year were actionable for the eco Complaints Office ("actionable complaints"). A complaint is considered as actionable if a violation of the law is detected, and measures are taken subsequent to an assessment. As a matter of principle, measures are taken for every violation of the

Received Complaints 2022 (Excluding Spam)



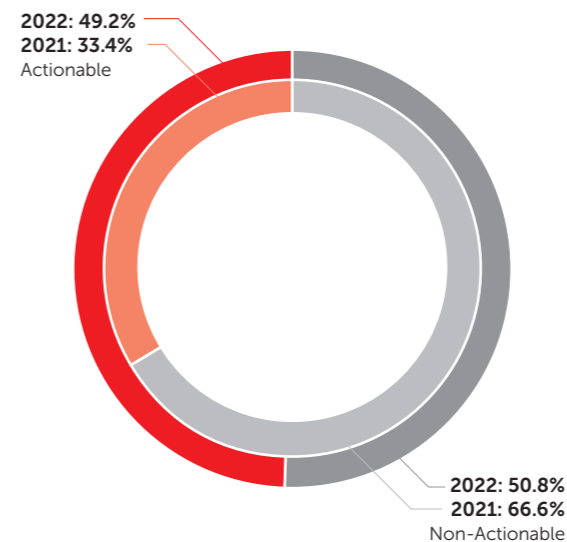
Source: eco Complaints Office, 2023

\* 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 (StGB). 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. Capitalized terms such as Child Pornography are terms derived directly from German law.

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, etc.).

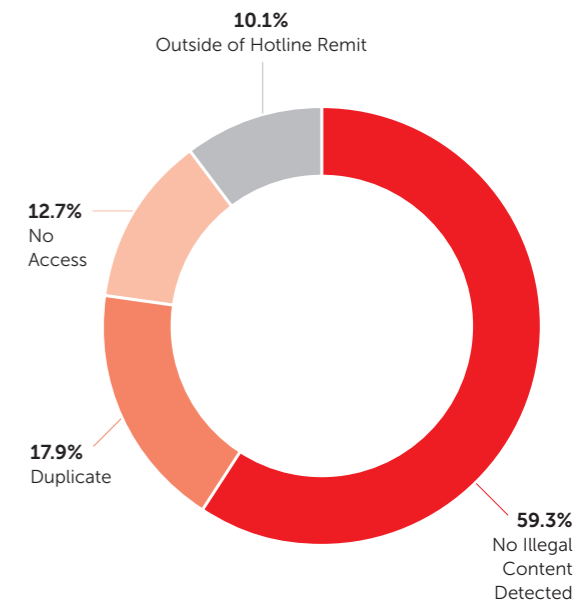
Compared to the previous year (2021: 8,613 actionable cases), the number of actionable complaints increased slightly by 3.4 percent: With 8,904 cases, in 2022 the eco Complaints Office consequently recorded a new peak in actionable complaints.

Proportion of Actionable Complaints 2022 Compared to 2021 (Excluding Spam)



Source: eco Complaints Office, 2023

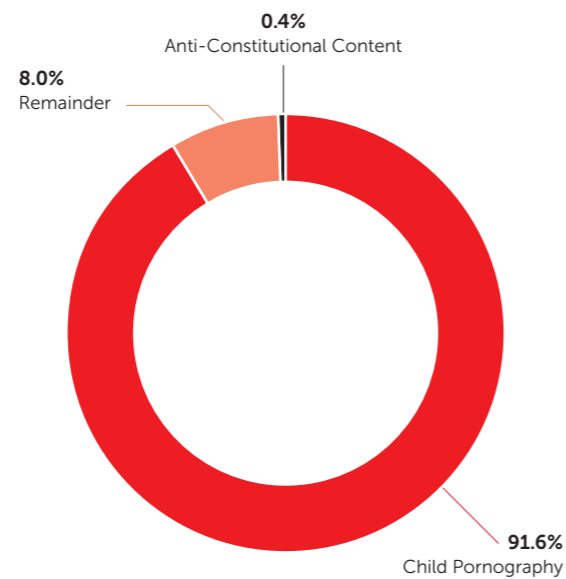
Non-Actionable Complaints 2022 in Detail



Source: eco Complaints Office, 2023

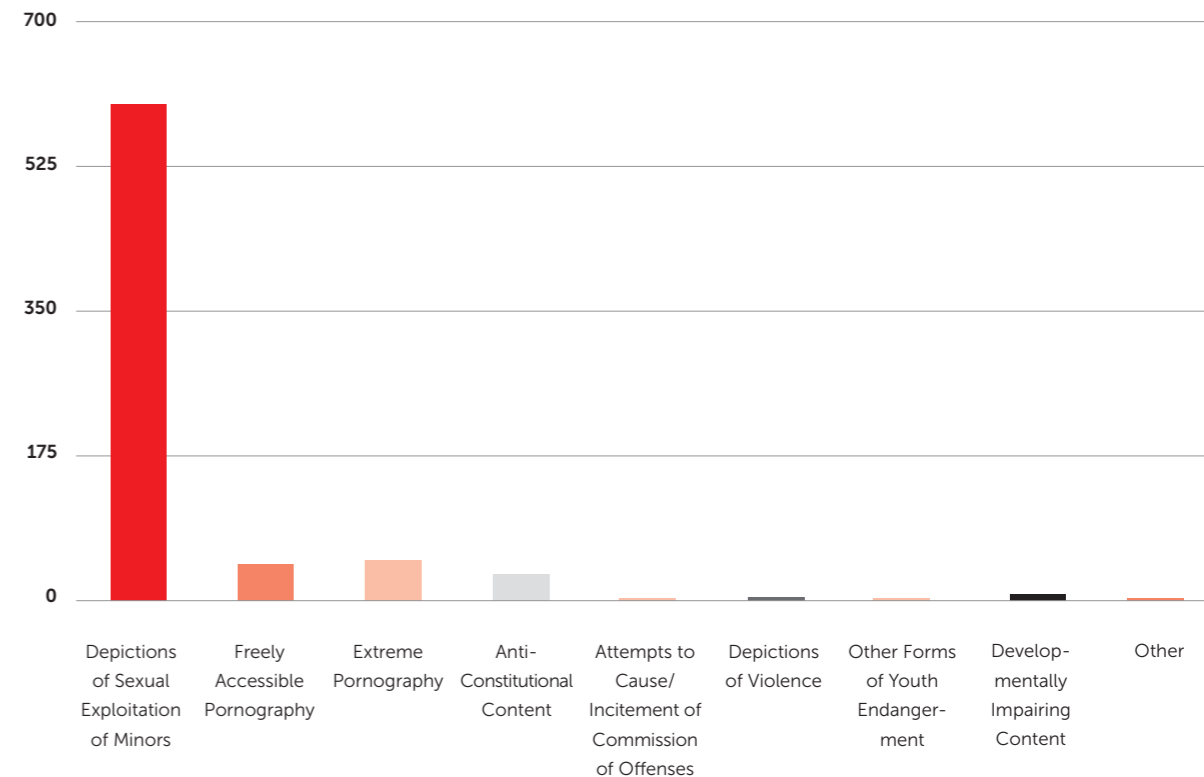
As in previous years, a large proportion of the actionable complaints involved content that is accessible via web-sites of all kinds (web-based content). In terms of content, Child Pornography content – as in previous years – also accounted for the largest share of actionable complaints. In this context, an increase of 15.3 percentage points was recorded in the year under review.

Actionable Complaints 2022 (Excluding Spam)



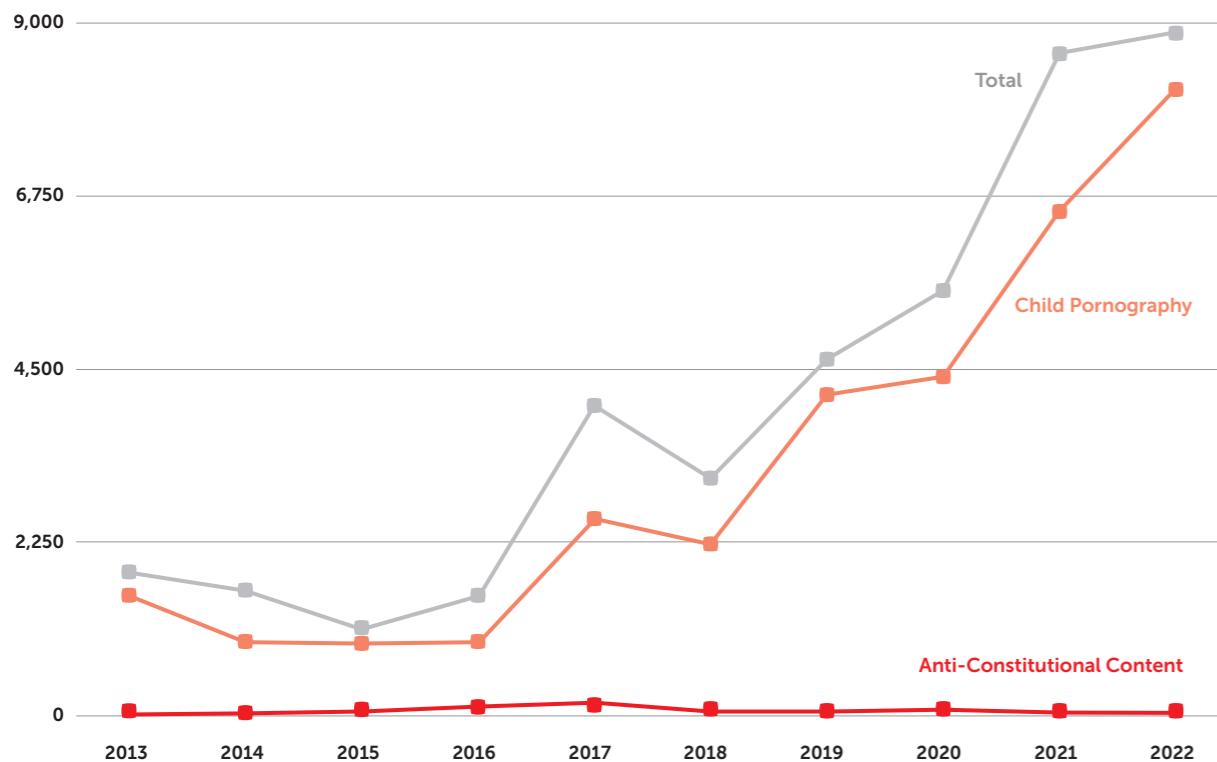
Source: eco Complaints Office, 2023

Actionable Complaints 2022 (Excluding Spam, Excluding Child Pornography)



Source: eco Complaints Office, 2023

Growth in Number of Actionable Complaints

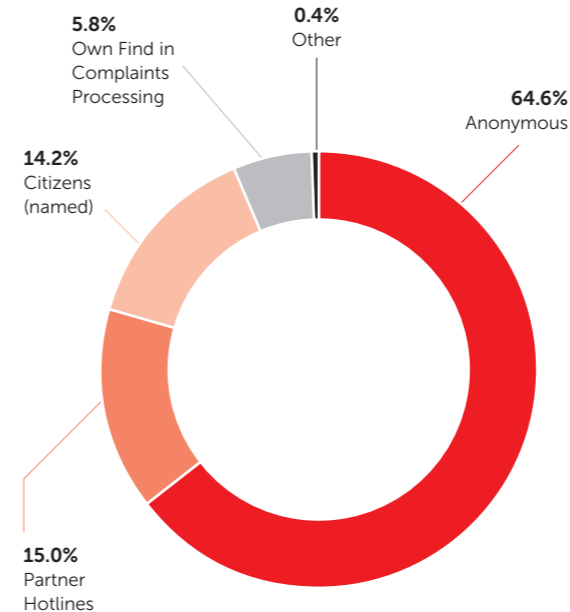


Source: eco Complaints Office, 2023

Once again, it has been proven that it is important to have the option to report illegal content anonymously. Compared to the previous year, the proportion of

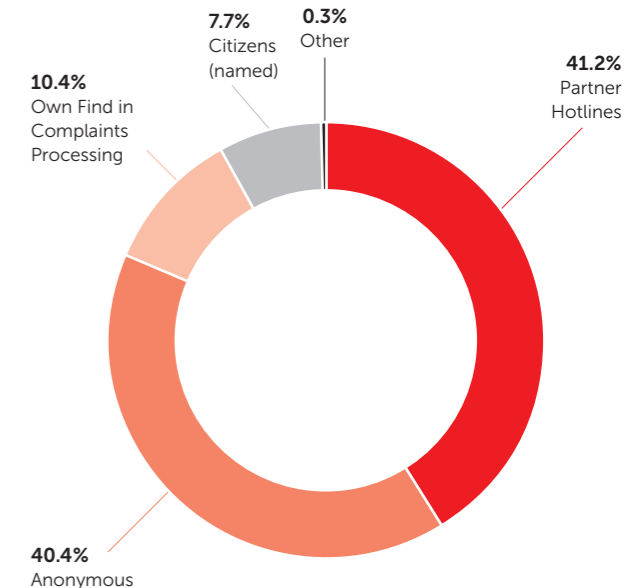
anonymous reports received increased by about 19 percentage points to 64.6 percent.

Reporters of the Received Complaints (2022)



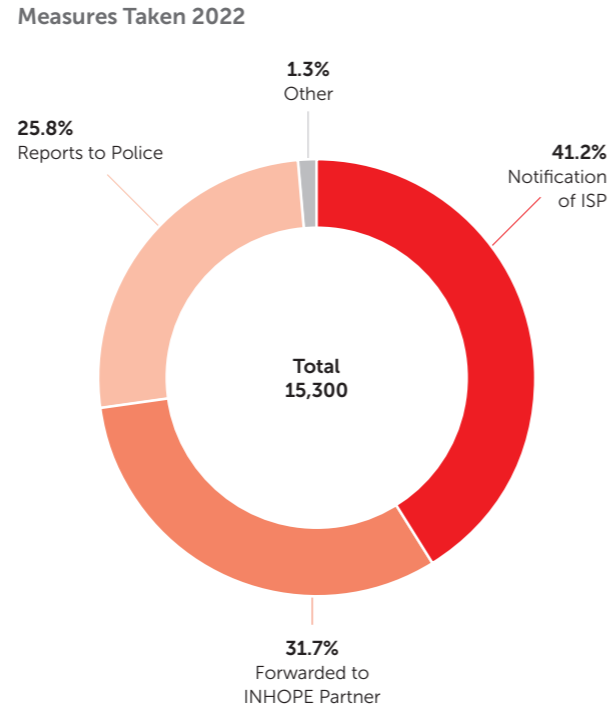
Source: eco Complaints Office, 2023

Reporters of the Actionable Complaints (2022)



Source: eco Complaints Office, 2023

Last year, the eco Complaints Office sent a total of 15,300 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 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. If, on the other hand, an INHOPE member can be contacted who in turn informs the law enforcement agencies, reporting to the BKA is generally refrained from in order to avoid duplication of work.



Source: eco Complaints Office, 2023

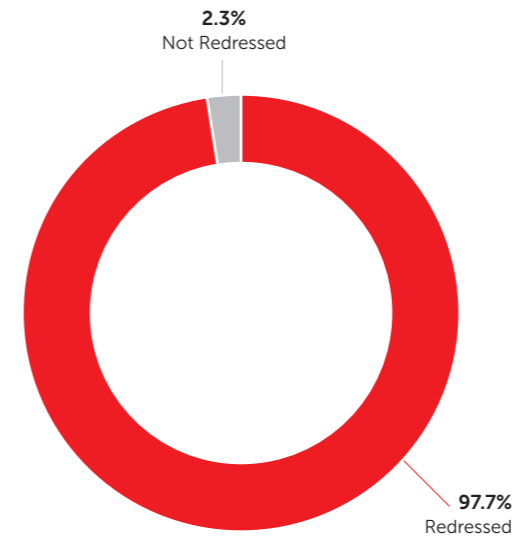
## 2.2 Success rate for web-based content

The high success rate for web-based content has remained constant when compared to the previous year: 97.7 percent of the content reported upon by the Complaints Office was taken down or otherwise legalized (for example, through the implementation of an age verification system); in around 8.7 percent of these cases, the

reported URL was initially moved to another provider (so-called "moved cases").

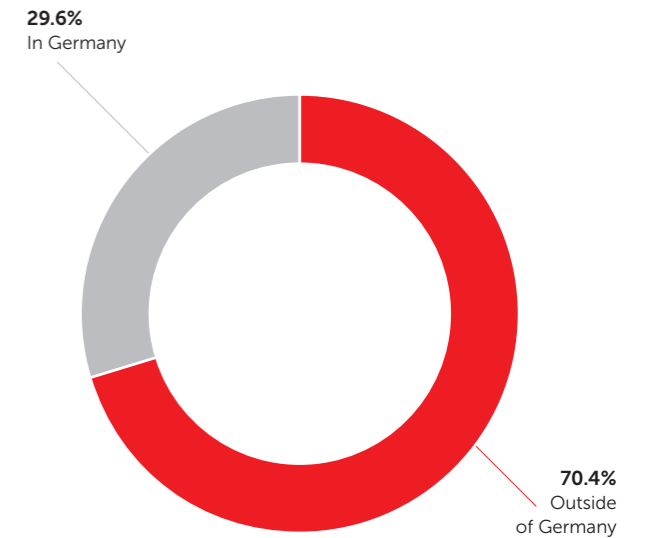
This demonstrates that self-regulation works, also internationally. Because just less than a third of the reported URLs (29.6 percent) were hosted in Germany.

Total Success Rate for Web-based Content 2022



Source: eco Complaints Office, 2023

Hosting of Web-based Content 2022



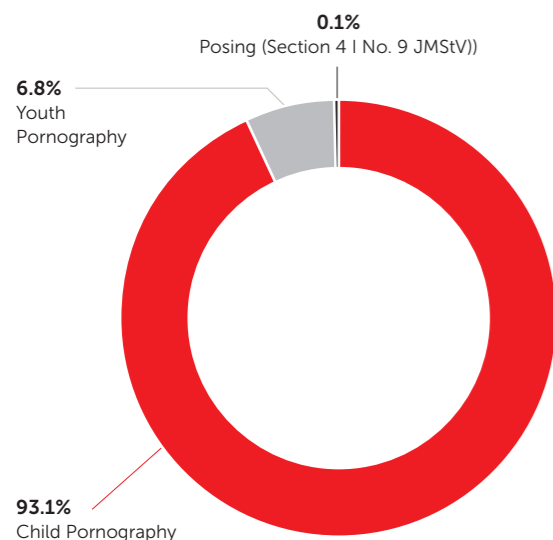
Source: eco Complaints Office, 2023

### 2.3 Complaints about depictions of the sexual abuse and sexual exploitation of minors (CSEM) in detail

The number of actionable complaints regarding depictions of the sexual abuse and sexual exploitation of minors increased by around 28 percent in 2022. Of the total of 8,760 cases from this area of offense, the majority – as in previous years – were regarding content that qualified as Child Pornography as defined in Section 184b of the German Criminal Code.

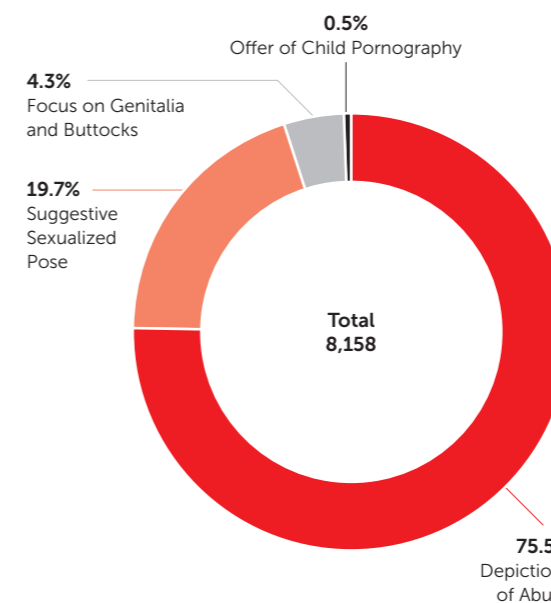
The offense of Child Pornography comprises depictions of sexual abuse of children, images of partially or completely naked children in a suggestive sexualized pose, and the sexually provocative reproduction of the naked buttocks or genitalia of children. Approximately three-quarters of actionable Child Pornography complaints in 2022 concerned the first variant (depictions of the sexual abuse of children). Compared to the previous year, this represents an increase of around 10 percentage points.

Actionable Complaints of CSEM in Detail (2022)



Source: eco Complaints Office, 2023

Content Qualified as Child Pornography in Detail (2022)



Source: eco Complaints Office, 2023

In 2022, just under 20 percent of the actionable complaints in the area of depictions of the sexual abuse and sexual exploitation of minors concerned Posings, which constituted a decrease of approximately 10 percentage points compared to the previous year.

Posing is understood as images of minors in an unnatural or suggestive sexualized pose. Under German law, such content may not be disseminated online. Depending on the age of the person shown and the kind of depiction, Posing may represent purely an infringement of media law (Section 4 (1) 9, German Interstate Treaty on the Protection of Minors in the Media (JMStV)), or is punishable as Child Pornography or Youth Pornography (Section 184b (1) 1b and Section 184c (1) 1b, German Criminal Code).

### 2.3.1 Challenges in 2022

From a technical viewpoint, it is important to emphasize that in 2022 – 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 the sexual abuse and sexual exploitation of 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” site registers where users have come 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 a specifically defined cookie file recognized by the 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 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.

From a legal perspective, in some cases the boundary between the different varieties of offense in relation to Child Pornography as defined in Section 184b of the German Criminal Code posed a challenge, especially with regard to statistical recording. This also applies to the boundary between Child Pornography and other relevant regulations in the area of depictions of sexual abuse and sexual exploitation of minors. In addition to an assessment of the age of a child, particular examples to be mentioned here relate to the distinction between

images of children in an unnatural or suggestive sexualized pose and the sexually provocative reproduction of the unclothed genitalia or the naked buttocks of a child.

A further challenge is presented by the different legal situations of countries; in particular, there are international differences in the area of Posing, virtual or text-based Child Pornography, and cases of links to Child Pornography material.

In the processing of complaints on content distributed via so-called file hosting services (mostly videos), the viewing of this content in 2022 was also more time-consuming. In addition, some content could only be accessed with a premium account. The platform operators concerned did not always provide us with a corresponding account free of charge. In these situations, in some cases the cooperation within the INHOPE network made it possible to review the reported content.

In 2022, in a few isolated cases, the eco Complaints Office also found that distributors of illegal content switched their content to another hosting provider, especially after take-down by the original provider. In some cases, the content was switched 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.

### 2.3.2 Overview of the reaction times for web-based Child Pornography cases

In viewing the following figures and graphs on reaction times for Child Pornography web content and Posing cases, it should be borne in mind that these do not necessarily represent the effective or actual reaction time of the Internet Service Provider (ISP). Instead, these represent the time from which the eco Complaints Office receives the

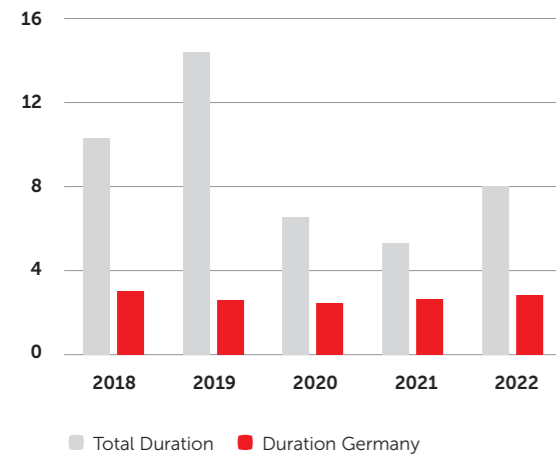
report until the eco Complaints Office verifies the take-down. Here, the frequency of checks to ascertain take-down also influences the reaction times: the more often checks are made to see whether the content has been taken offline, the more exact and conclusive statements regarding reaction times are. As a rule, the eco Complaints Office checks for take-down on weekdays and does not remove weekends and public holidays on which the eco

Complaints Office does not work from the calculation of the accessibility and success rates.

In 2022, take-down times in Germany remained consistently short, but increased in cases outside of Germany: Websites with Child Pornography hosted in Germany were offline ("taken down") within 2.83 days on average, whereas globally it took 7.91 days.

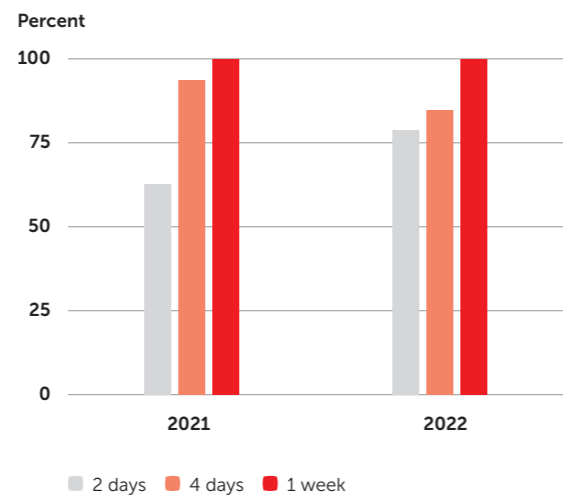
For Child Pornography content overall, a total success rate of 98.5 percent was recorded (for content hosted in Germany, this was 100 percent). Overdue (as well as delayed) take-downs were primarily caused by different legal situations with regard to texts, virtual depictions and links.

Average Duration until Take-Down in 5-Year Annual Comparison (Child Pornography)



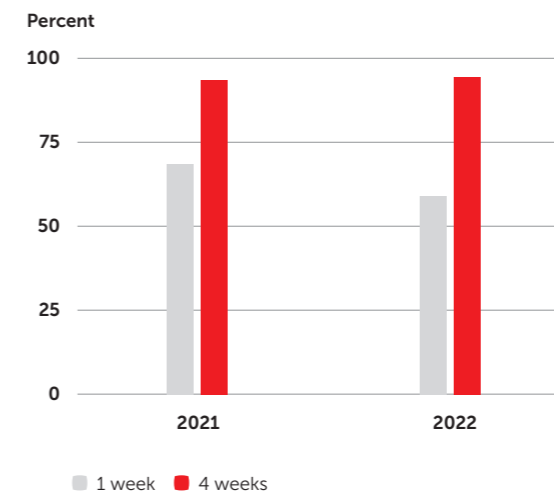
Source: eco Complaints Office, 2023

Take-Down Rates Child Pornography (German Cases)



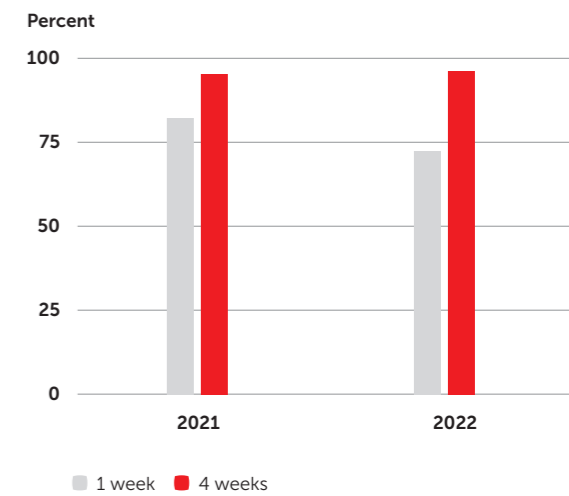
Source: eco Complaints Office, 2023

Take-Down Rates Child Pornography (Outside of Germany)



Source: eco Complaints Office, 2023

Take-Down Rates Child Pornography (All Cases)



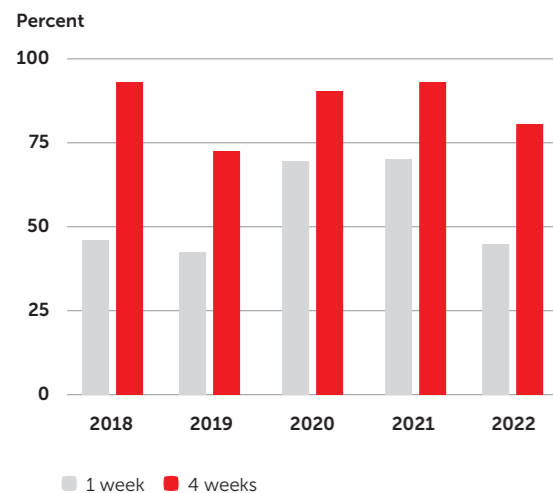
Source: eco Complaints Office, 2023

### 2.3.3 Overview of reaction times for web-based Posing cases

As in the previous year, the take-down times of so-called Posing of minors did not differ significantly from the take-down times for images of the sexual abuse of children. Worldwide, it took on average 7.43 days from the

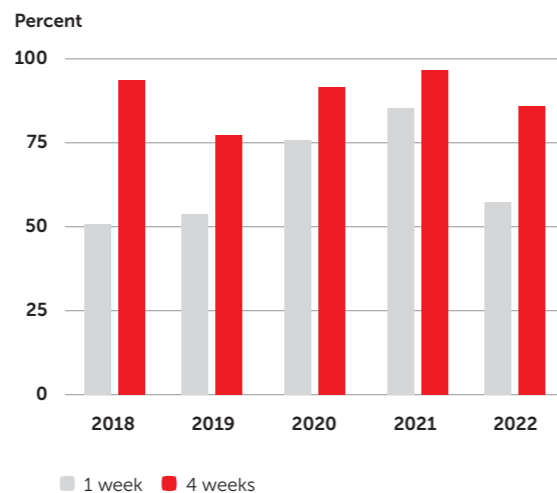
time that the report was submitted to eco until the content had disappeared from the Internet. Content hosted in Germany was no longer available on average after 3.15 days. (These figures also include public holidays and weekends.)

Take-Down Rates Depictions of Posing (Outside of Germany)



Source: eco Complaints Office, 2023

Take-Down Rates Depictions of Posing (All Cases)



Source: eco Complaints Office, 2023

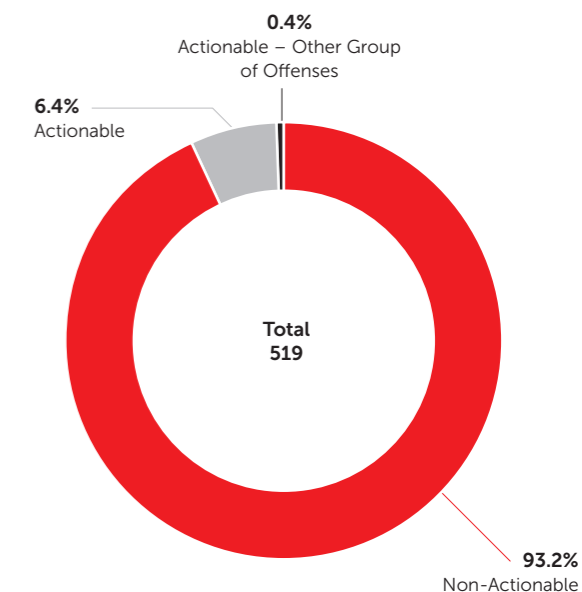
## 2.4 Complaints about anti-constitutional content in detail

The eco Complaints Office classifies the following offenses as "anti-constitutional content" (in the broad sense): incitement of the masses (Section 130 StGB), dissemination of propaganda material of unconstitutional organizations (Section 86 StGB), use of symbols of unconstitutional organizations (Section 86a StGB), disparagement of state and denigration of symbols (Section 90a StGB), disparagement of constitutional organs (Section 90b StGB), forming of criminal and terrorist organizations (Sections 129 et seq. StGB), revilement of religious faiths (Section 166 StGB), and defamation directed at persons in political life (Section 188 StGB).

In 2022, the proportion of actionable complaints in this offense sector was once again strikingly low. Only around 6 percent of the possible anti-constitutional content reported to the eco Complaints Office was or could ultimately be classified as illegal content.

In the final analysis, the eco Complaints Office classified 33 pieces of reported content as illegal in the area of "anti-constitutional content." This equates to 0.4 percent of all of 2022's actionable complaints, which is almost identical to the classification of the previous year. The relevant cases reported to us again covered a large number of services.

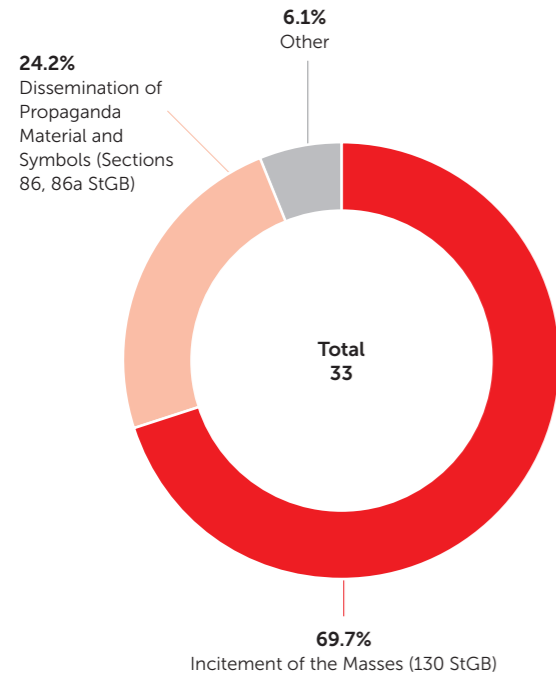
Proportion of Actionable Complaints on Anti-Constitutional Content 2022



Source: eco Complaints Office, 2023



**Actionable Complaints on Anti-Constitutional Content in Detail 2022 (total)**



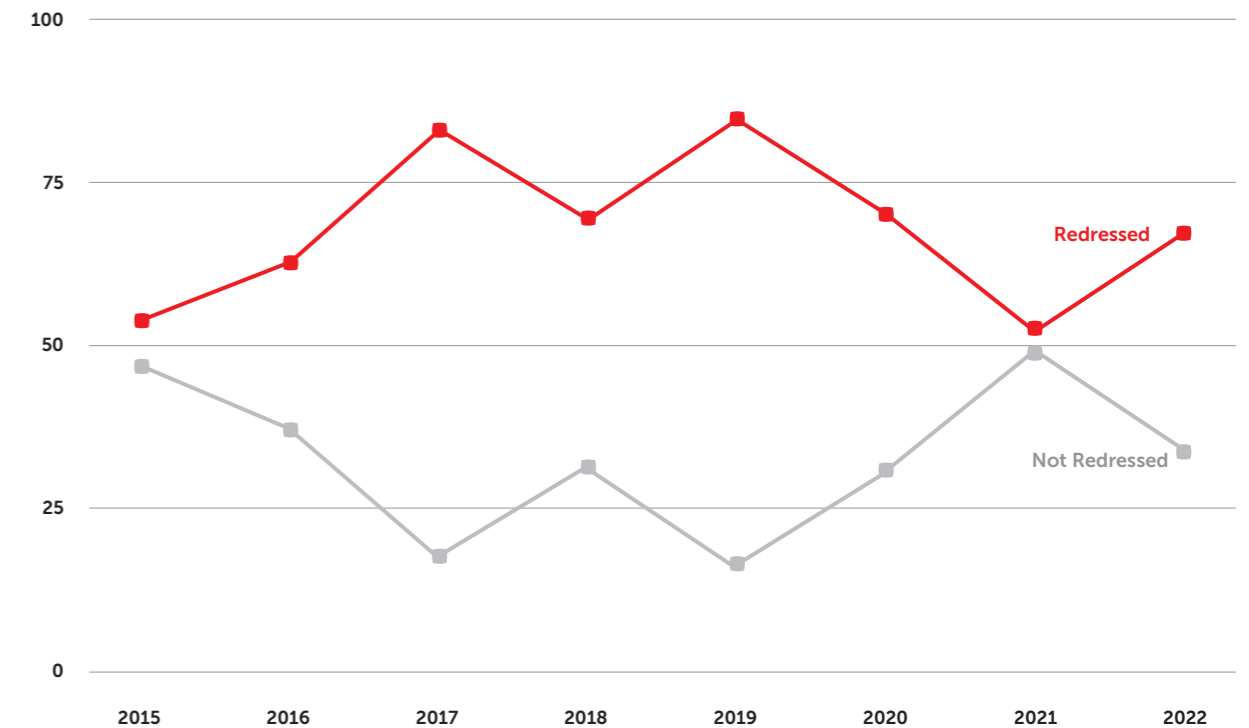
Around two-thirds of the actionable complaints concerning anti-constitutional content were attributed to the area of incitement of the masses. In the year under review, statements and depictions deemed as “critical” concerning measures for combatting the ongoing pandemic were once again particularly prominent.

Almost a quarter of the actionable complaints on anti-constitutional content concerned the publication of unconstitutional symbols such as swastika flags and the dissemination of unconstitutional propaganda material.

The low rate of actionable complaints in this offense sector once again makes it clear that the legal hurdles for actual violations are high, especially as a result of freedom of expression. Freedom of expression has a high value. For a statement to be prohibited, it must be more than a “nasty comment.” This again serves to prove how important a thorough – and at times also a time-consuming – assessment of the content is, so that freedom of expression can be ensured within the framework of existing law, and that permissible statements are not simply deleted due to being undesirable.

Source: eco Complaints Office, 2023

**Success Rates for Anti-Constitutional Content 2015–2022**



Source: eco Complaints Office, 2023

Due to the low number of cases in 2022 in the field of anti-constitutional content, statistical data naturally has only limited informative value. This also applies especially to information on take-down successes and reaction times in this area. Nevertheless, for reasons of transparency, a brief overview of the findings of the eco Complaints Office is provided below:

In this year, it took an average of 8.39 days (including weekends and public holidays) from the time the ISP was notified until this reported content was no longer available. In total, 66.7 percent of the anti-constitutional content reported to the Complaints Office was removed.

At this point, it should also be emphasized that about one fifth of the reported content was hosted in Germany. In contrast to depictions of the sexual abuse of children, incitement of the masses and other anti-constitutional content is not equally prohibited around the world. In terms of the respective locations, a wide divergence exists in the legal situations. Despite this, in many cases, success (redress) could be achieved, because the hosting provider mostly took measures on the basis of prevailing law or the company's own T&Cs.

In comparison to depictions of the sexual abuse of children, the take-down times for anti-constitutional content are relatively long. One reason for this is the different legal situations in the various countries, which result in a greater need for coordination, and which can thus have an influence on the take-down times.

In terms of process, the eco Complaints Office also must take account of a longer waiting period between the report being made to the police and the ISP (three working days). In addition, complaints about depictions of the sexual abuse and sexual exploitation of minors are accorded priority, given that the possibility is always present of the law enforcement agencies identifying the victim or perpetrator, which means that further abuse can be prevented. At times when a high receipt of reports of depictions of sexual abuse and sexual exploitation of minors occurs, this can lead to delays in checking take-down times for other offense sectors, rather than these being checked at the usual frequency interval rate.

## 2.5 Complaints about unsolicited advertising emails

The eco Complaints Office also follows a self-regulatory approach when it comes to the processing of complaints about the impermissible sending of advertising emails and newsletters. The senders of such emails are informed of the legal requirements for permissible email advertising – with a request for compliance. If required, addressing the provider used for the sending of emails can be a sensible measure, in which case the provider can take further measures; for example, in the case of spam being sent via a botnet or by senders who do not immediately respond appropriately.

In the case of complaints about the impermissible sending of advertising emails and newsletters that pertain to one of the senders certified by eco as part of the Certified Senders Alliance (CSA), more intensive processing of the complaint occurs. If the complainant mandates this,

a comprehensive consideration of the facts takes place (in particular regarding data collection), and in the case of non-compliance with the CSA regulations, measures are taken to ensure compliant sending in future.

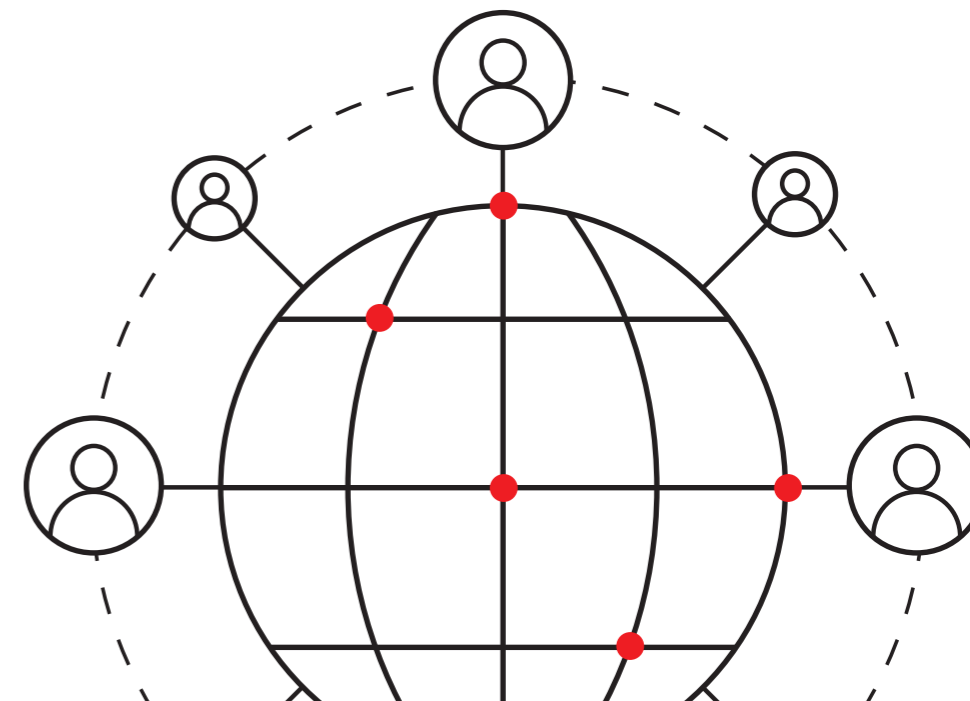
In the year under review, the eco Complaints Office received a total of 472,763 complaints concerning unsolicited advertising emails – equating to about 11 percent more complaints than in the previous year. What should be highlighted is that the composition and advertised content of the relevant emails remained aligned to the pandemic situation. For example, significantly more advertising emails were sent out for respiratory protection masks. In addition, as was the case in previous years, there were also too many repeated mailings.

## 3. Our Network

### 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 cooperation 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 world-wide.

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 2022.



### 3.1 INHOPE ([www.inhope.org](http://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 20 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). The network now consists of 50 hotlines in 46 countries. Complaints concerning illegal Internet content can thus be forwarded to the relevant responsible partner. 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 cooperation 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. In 2022, for example, INHOPE supported the exchange of experience between hotlines by providing financial assistance for visits at partner hotlines. The eco Complaints Office also benefited from this: both as a host for colleagues from Luxembourg and Belgium, and as a visitor at the Irish hotline. In addition, an “Advanced Analyst Workshop” was held, in which the eco Complaints Office also participated. This form of a workshop promotes the exchange of knowledge between (highly experienced) hotline staff and thus facilitates approaches to solving new trends or problems, such as those described in Chapter 2.3.1. Based on these efforts, faster and better results are jointly achieved in the take-down of illegal content.

In terms of content, the network in 2022 focused on exchanges on working methods, technical developments

## INHOPE

to support complaint handling, and staff welfare. In addition, the implementation of the new European “CSAM strategy” remained an important topic of the network’s activities, with one of the roles of the eco Complaints Office being its active involvement in the INHOPE Policy Task Group.

Since June 2018, Peter-Paul Urlaub, Consultant at the eco Complaints Office, has been a member of the INHOPE Executive Board and has held the role of Treasurer since July 2020. In the year under review, at the Annual General Meeting in Lisbon, he was re-elected to this position for the next two years.

### 3.2 Safer Internet Centre Deutschland ([saferinternet.de](http://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, the State Media Authority of North Rhine-Westphalia, 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 [www.internet-beschwerdestelle.de](http://www.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. This initiative was continued last year as part of the German Safer Internet Centre.

In addition, on the occasion of the European Day for the Protection of Children against Sexual Exploitation and Abuse on 18 November 2022, the eco, FSM, and jugendschutz.net hotlines published several short information videos on the topic of sexualized violence against children and young people on the Internet, including available options for action if confronted with such content on the Internet.



In 2022, the German Safer Internet Centre continued to receive financial support from the European Union – in the first quarter, from the EU’s “Connecting Europe

Facility” fund and, subsequently, from the “Digital Europe Programme.”

### 3.3 fragFINN.de

fragFINN e. V., of which eco is also a founding member, has been offering a protected surfing space for children for an impressive fifteen years. This is based on a so-called “positive list” for Internet sites suitable for children. This list has been developed by fragFINN and is regularly checked by experienced media pedagogues. In the portal “fragFINN.de,” one of the opportunities that children are offered is a search engine which simplifies their access to Internet sites which 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 the year under review, fragFINN not only held a ceremony to mark its 15th birthday, but also applied a particular focus to the FINN-reporters. This project enables children to work as journalists: They produce articles, videos, podcasts and much more in the fragFINN children’s editorial team and post them online on the website so that other children can also find out more.

### fragFINN.de



### 3.4 Working Group “No Sexualized Violence against Children on the Internet”

In 2022, the eco Complaints Office was again involved in the working group entitled “No Sexualized Violence against Children on the Internet.” Together with FSM and jugendschutz.net, the eco Complaints Office continued working on the project as a “core group” of the working group. Together, the three hotlines covered the follow-up of the virtual expert exchange held at the end of 2021 with more than 60 experts from around 20 countries and the topic “File or Image Hosters as a Distribution Medium for Depictions of Abuse.” The activities of the “No Sexualized Violence against Children on the Internet” working group will now be delegated to the

German Federal Agency for the Protection of Minors in the Media (BzKJ), which opens up further cooperation opportunities for the eco Complaints Office.

In addition, the eco Complaints Office continued to comprehensively process complaints concerning depictions of the sexual exploitation of minors on the Internet, as well as their statistical recording and evaluation. This work, alongside the extensive awareness-raising measures with regard to the sexual exploitation of minors, was supported by the German Federal Ministry for Family Affairs, Senior Citizens, Women and Youth.

### 3.5 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 deleting Child Pornographic web content. The most recent report, published in August 2022, once again showed that the principle of “take-down instead of blocking” and the cooperation of the hotlines, the BKA, and the German

Federal Agency for the Protection of Children and Young People 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. This agreement has been adapted several times – most recently in 2017 – to reflect the most current developments.

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.

In addition, the collaborative work between the eco Complaints Office and the police at state level is part of a cooperation agreement between eco, Networker NRW, and the North Rhine-Westphalia Criminal Police Office (LKA NRW).

The eco Complaints Office is also active at the local level – one example here is “SUSII” (Safe-and-Secure-on-the-Internet), a safety and security project that eco established together with the Cologne Police Headquarters in 2016. SUSII (susii.nrw) is a free and non-commercial Internet safety and security portal, targeted initially at citizens (of Cologne), as well as at small and medium-sized enterprises (SMEs), and in the meantime extended to cover the districts of Leverkusen and Rhine-Erft. In this context, eco supports the “Make Your Password Strong” campaign of the North Rhine-Westphalia Criminal Police Office (LKA NRW).

### 3.6 Cooperation on youth media protection with other relevant actors

In 2022, the eco Complaints Office also continued its exchange with other relevant actors in the field of youth media protection.

In continuing to build on the work of previous years, the eco Complaints Office extended its cooperation on common and specific topics with the State Media Authority of North Rhine-Westphalia (LfM) and other supervisory bodies. The Complaints Office also cooperated with the LfM as part of the initiative “Prosecute, don’t just delete.” Reciprocal participation in events also took place. For example, LfM representatives participated in an event organized by the eco Complaints Office on the occasion of Safer Internet Day 2022, while the eco Complaints Office took part in the “Protecting Freedom, Securing the Law Together” conference on 24 May 2022.

The eco Complaints Office was represented at the SIKID Forum on Interaction Risks, which took place in Berlin on 27 and 28 June 2022. The SIKID project, which has been funded by the German Federal Ministry of Education and Research (BMBF) since September 2021, is dedicated to current issues of security for children in the digital sphere and aims to improve regulation, to connect stakeholders, and to implement children’s rights. In SIKID, low-threshold security instruments and youth protection concepts for the Internet are to be developed

based on a children’s rights approach. In this context, the primary focus is on interaction risks. In addition to regulation issues, the project aims to address issues of prevention and resilience from the perspectives of security and media ethics, children’s rights, law and psychology.

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, but also with regard to questions in individual cases. Since 2019, Sebastian Fitting, Consultant at the eco Complaints Office, has also been active in assessment committees as a youth protection expert for USK.online, and took part in two USK training courses in the year under review. In addition, since the end of 2022, Christian Kubiak has been a second eco Complaints Office Consultant acting at the USK as a youth protection expert.

In 2022, “trusted flagging/reporting” was also an essential element of the eco Complaints Office’s effective work. The special reporting channels for trustworthy whistleblowers enable direct interaction between hotlines and providers, which simultaneously has a positive effect on reaction times.

### 3.7 Imparting 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 messenger services, knowing how to use and handle these is not always easy, especially for children and young people.

This is why the Complaints Office makes itself available for parents' evenings and teacher training courses, in order to sensitize people to legal risks and thus promote the positive use of all online services. In addition, the eco Complaints Office offers its own digital event formats. 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.

Accordingly, the eco Complaints Office was able to support the first "Child and Youth Protection" educational conference of the Rhine District of Neuss educational network. This involved running a workshop and informing teachers and educators about the field of "sexualized violence against minors in the digital sphere."

Together with the State Prevention Unit against Violence and Cyber Violence for Schools in North Rhine-Westphalia (the new network partner), the eco Complaints Office also implemented several information events and workshops.

In addition, in collaboration with the Cologne Police Headquarters, the eco Complaints Office supported a specialist event held by the Burscheid Women's Counselling Center concerning sexualized violence in the digital sphere. The aim here was to raise awareness on this field of crime among both counsellors and victims and to highlight possible courses of action.

### 3.8 Special cooperation via the eco Complaints Office's partnership model

For the eco Complaints Office, cooperation 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 Complaints Office. Each actor has specific options for action, interests or responsibilities. Together, they can act effectively and achieve a great deal. 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. Supported by and in cooperation with the special partners Google, Meta and T3K, the combatting of illegal Internet content has been enhanced, multipliers and Internet users have been made aware of risks and possible responses, and the important exchange with political actors has been pursued jointly in a variety of ways.

You can find further information at:

<https://international.eco.de/topics/policy-law/eco-complaints-office/partnership-with-the-eco-complaints-office/>

## 4. 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 more than 25 years of expertise in this field.

#### ■ Legal Expertise

The 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.

#### ■ 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 cooperation 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.

#### ■ 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 in close proximity to world politics, monitors processes, and immediately recognizes and reacts to new developments in the field of youth protection.

#### ■ Close to politics

In addition to the full legal qualifications of our staff, who assess online content and any measures to be taken, member companies profit from over 25 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 who are active in the field of youth media protection, with the aims of exchanging experiences and gathering information. Two to three planned meetings are held per year, with additional relevant parties and external experts sometimes also invited to contribute.

In 2022, the expert lunch meetings once again took place virtually. Two particular focal discussions related to the amendment of the German Interstate Treaty on the Protection of Minors in the Media and the EU Commission's proposal for a "Regulation on laying down rules to prevent and combat child sexual abuse" (the CSAM Regulation). Discussions also took place on political efforts of other European countries, as well as the activities and experiences of the eco Complaints Office in combatting illegal content.

The three meetings planned for 2023 are also expected to take place on a virtual or a hybrid basis. 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 (JMStV) and the corresponding regulations in the German Criminal Code (StGB);
- Legal developments in youth media protection in its broadest sense;
- "Digital trends"; and
- The activities of the eco Complaints Office

## 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 (JMStV).

With the eco Youth Protection Officer Service, the 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:

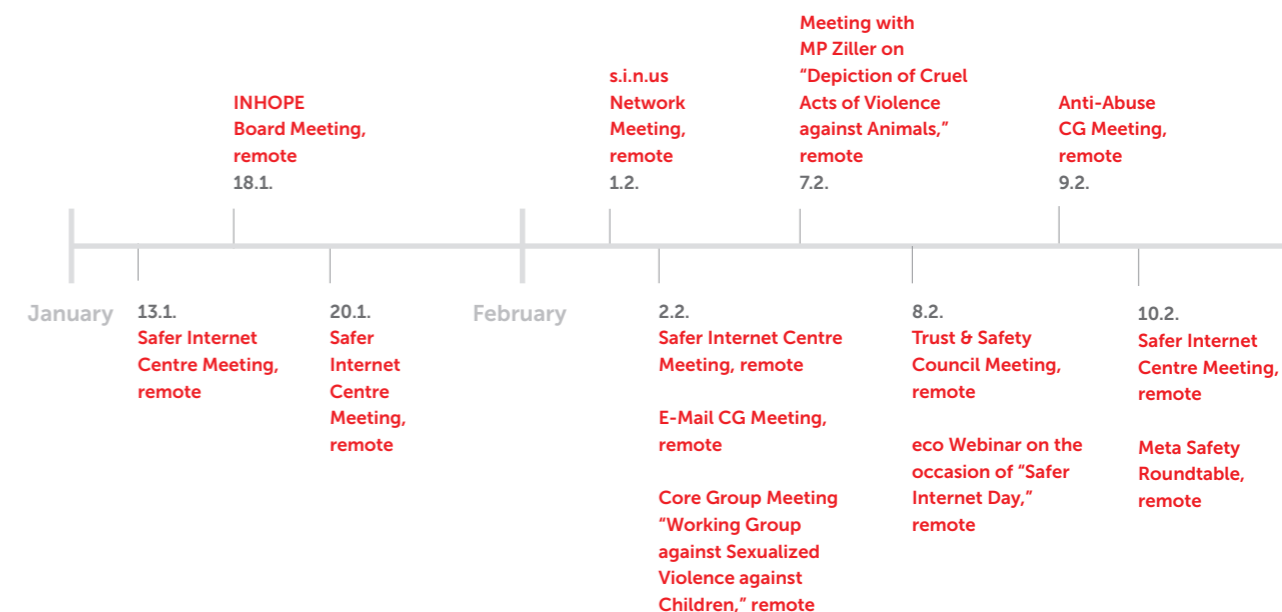
- Comprehensive consultation on matters relating to youth protection
- A neutral point of contact between telemedia providers and their users
- The minimization of liability risk
- Prevention of official fines and written warnings
- An increase in user trust through effective youth protection, current 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](mailto:jugendschutzbeauftragte@eco.de)



## 5. Events, Representation and Political Work



In its fight against illegal Internet content, in 2022 the eco Complaints Office continued its active involvement in numerous events and committees at national and international levels. The following chapter features a sample of these activities.

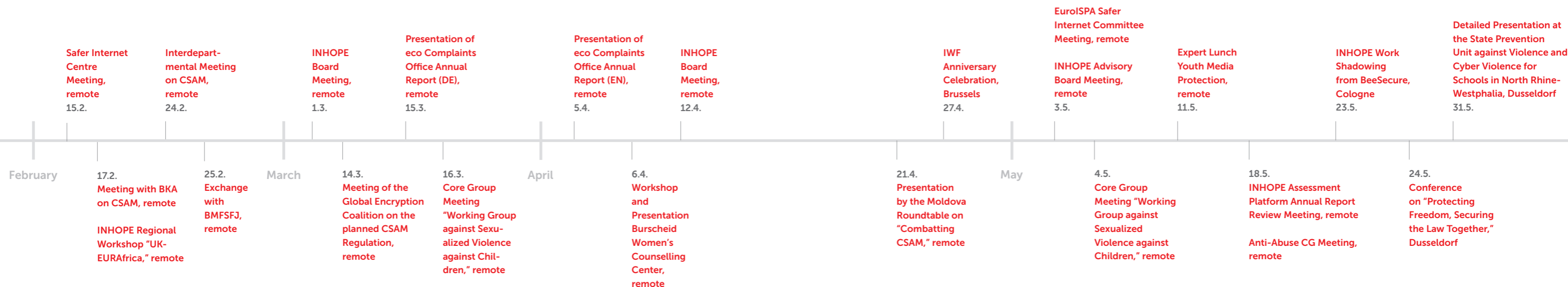
08.02.2022

### Safer Internet Day 2022

As in previous years, the eco Complaints Office held a joint event with the Cologne Police Headquarters to mark Safer Internet Day. Due to the ongoing pandemic situation, a digital workshop was organized by consultants from the eco Complaints Office, alongside representatives of the Criminal Commissioner's Office for Crime and Victim Protection. The title of the workshop was "Sexualised Violence on the Internet and the Offline Consequences – Online Criminal Offenses in the

Focus of Schools, Students and Guardians – Law – Law Enforcement – Prevention."

The 250 or so participants mainly included teachers, social educators and staff members of state institutions. The eco Complaints Office and the Cologne Police Headquarters – together with network partners from schools, law enforcement agencies and preventative services – provided practical and interactive information about developments and possible risks in the areas of sexualized violence and anti-constitutional content in the digital sphere.



14.03.2022, 05.04.2022

### Presentation of the eco Complaints Office's 2021 Annual Report

In the presence of Ms. Winkelmeier-Becker (Member of the German Bundestag and Chair of the Legal Affairs Committee) and, sequentially, Ms. Martina Link (Vice President of the German Federal Criminal Police Office) and June Lowery-Kingston (European Commission, Head of Unit DG CON- NECT, G3, Accessibility, Multilingualism, Safer Internet), the Head of the eco Complaints Office Alexandra Koch-Skiba presented the 2021 Annual Report in German and English on 14 March and 5 April 2022 respectively. These presentations took place via a virtual press and policy briefing.

With 8,613 cases, the eco Complaints Office had once again registered a record number of actionable complaints. As before and since, a large proportion of these in 2021 involved depictions of sexual abuse and sexual exploitation of minors. The 2021 report once more highlighted that, despite a substantial number of complaints, the principle of take-down instead of blocking works and yields success. For example, the eco Complaints Office was able to successfully take action against prohibited content in 97.2 percent of cases worldwide, thus maintaining the good success rate from previous years.

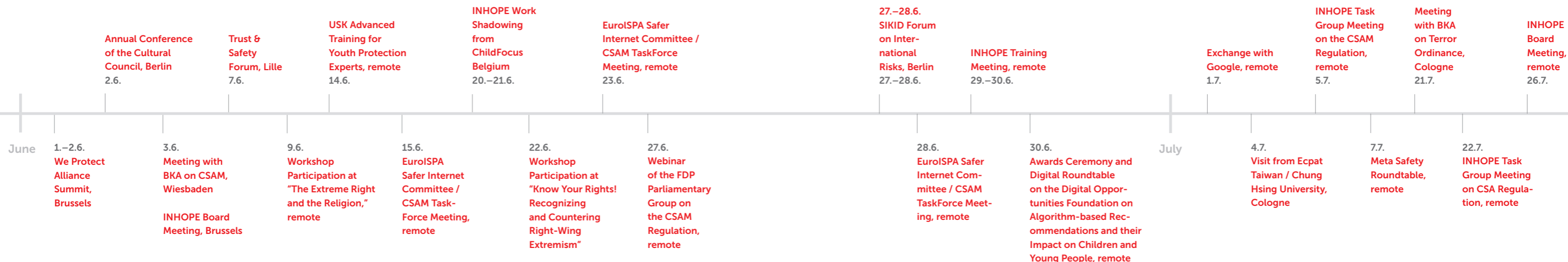
24.05.2022

### Conference on "Protecting Freedom, Securing the Law Together"

Christian Kubiak, Consultant at the eco Complaints Office, took part in the conference "Protecting Freedom, Securing the Law Together" of the State Media Authority of North Rhine-Westphalia on 24 May 2022 in Dusseldorf.

In addition to keynote speeches by representatives from politics and state supervisory authorities, the participants – colleagues from the areas of law enforcement, supervision, hotlines and other media professionals – had the opportunity to address individual issues in small group

workshops. The eco Complaints Office contributed to the workshop on "Target Group-Oriented Media Competence" and reported on its experience in exchanges with educators alongside the complex challenges of assessing and legally evaluating depictions of sexualized violence against children and young people. In further workshops, topics that were addressed included the challenges of disinformation, digital supervision and youth media protection.



02.06.2022

**Annual Conference Cultural Integration Initiative**

Under the title of "Cohesion against Racism," the Berlin Cultural Integration Initiative invited participants to its Annual Conference on 2 June 2022. In addition to keynote speeches by representatives from politics and science, the participants had the opportunity in working groups to exchange ideas on key topics. In the workshop on "Racism in the Social Media," Sebastian Fitting, Consultant at the Complaints Office, presented the work of the eco Complaints Office, focusing in particular on anti-constitutional content. The panel – which included representatives from politics, business, NGOs and law enforcement agencies – also discussed the difficulties

and possible solutions for dealing with racist content in social media together with the workshop participants.

07.06.2022

**Trust & Safety Forum**

The first Trust & Safety Forum was held in Lille on 7 June 2022. Embedded in the annual "Forum International de la Cybersecurite," this event brought together experts from the fields of international supervision/policy, the Internet industry and self-regulatory bodies. Together they discussed the rapidly growing field of "Trust & Safety" and its importance for relevant stakeholders and Internet users. As a panelist of the first roundtable of the event, the eco

Complaints Office was given the opportunity to present its work, the importance of the INHOPE network, and the successfully applied practice of self-regulation.

09.06.2022

**Workshop Series "Competent against Right-Wing Extremism"**

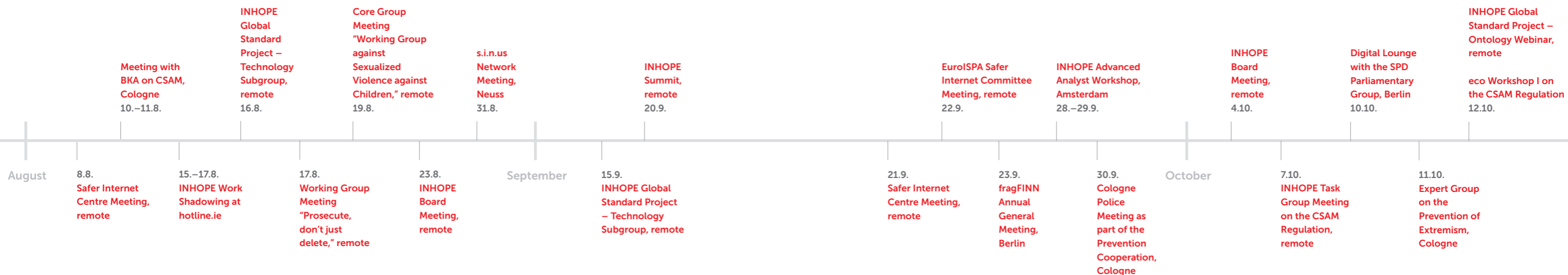
The Competence Network for the Prevention of Right-Wing Extremism (KompRex) conducted the modular training series "Competent against Right-Wing Extremism" over the course of March to August 2022. Sebastian Fitting, Consultant at the eco Complaints Office, attended the advanced training and focused on knowledge

transfer and the pooling of experience. Among other factors, he shared his experiences from the work of the Complaints Office with the other participants, who in their respective fields of work were faced with challenges in the context of right-wing extremism. An introductory two-part workshop on the basic principles was followed by several thematically focused events offered by the various KompRex providers.

27.–28.06.2022

**SIKID Forum on International Risks**

In the year under review, the eco Complaints Office, on the invitation of the BMBF-funded project "Security



for Children in the Digital World” (SIKID), participated in the expert workshop called “Forum Interaction Risks.” Based on the relevant content of the latest amendment to the German Youth Protection Act (JuSchG), during the workshop, the representatives who had been invited from the fields of law enforcement, research, prevention and the Internet industry were able to assess the present and future of “online security for children and young people” and identify challenges and solutions.

11.10.2022

#### Expert Group on the Prevention of Extremism

At the invitation of the Cologne City Council and the Cologne Police, the eco Complaints Office participated as a standing member in the first meeting of the Expert Group on the Prevention of Extremism. The aim of this expert group is to exchange information about the current situation of extremism in Cologne and to promote appropriate countermeasures and preventive measures at the local level. In this context, the plan is for various participants from all fields to provide impetus for countering extremism in all its forms, but first and foremost to counter right-wing extremism.

19.10.2022

#### Educational Conference “Protection of Children and Young People”

As part of its membership in the s.i.n.us network, the eco Complaints Office had the opportunity in the year under review to participate in the first educational conference of the “Rhine District of Neuss Educational Network” concerning the protection of children and young people. Following an amendment to the North Rhine-Westphalia

School Act, which includes an obligatory protection concept against sexualized violence, the educational conference brought together more than 400 educators, employees of social child and youth welfare institutions, and representatives from politics and business in order to discuss the pillars of such concepts.



### CSAM Regulation

14.03.2022, 03.05.2022, 15.06.2022, 23.06.2022, 27.06.2022, 28.06.2022, 22.09.2022, 12.10.2022, 26.10.2022, 15.11.2022

From a regulatory point of view, in 2022 the European Commission's proposal for a "Regulation on laying down rules to prevent and combat child sexual abuse" (CSAM Regulation) was the eco Complaints Office's primary topic. In addition to new obligations for providers, especially hosting providers or providers of interpersonal communication services, the regulation proposes the foundation and establishment of so-called competent or coordinating authorities in the Member States, as well as a so-called "EU Centre." The establishment of

new, specific bodies could have an impact on the work and the network of the established hotlines. Due to the impact on the member companies and established hotlines, this European planned legislation is therefore of particular significance for eco as a stakeholder and as a hotline operator.

The eco Complaints Office, represented by the Head of the Complaints Office Alexandra Koch-Skiba, has highlighted the existing concerns and ambiguities regarding the Commission's draft in multiple ways and has correspondingly engaged with relevant actors. For example, the Complaints Office participated in a virtual meeting of the Global Encryption Coalition on the planned

CSAM Regulation on 14 March 2022, and also presented eco's assessment of the proposed regulation at several virtual meetings of the EuroISPA Safer Internet Committee (03.05.2022, 15.06.2022, 23.06.2022, 28.06.2022, 22.09.2022). Accompanied by the Complaints Office, eco also held webinars on the CSAM Regulation on 12 and 26 October 2022. These were undertaken in order to discuss selected provisions with various external experts and, by conveying factual knowledge, to enable propositions for the further legislative debate to be generated. On 15 November 2022, there was also an in-person meeting with the personal assistant of MEP Javier Zarzalejos, who is the rapporteur for the CSAM Regulation in the lead LIBE Committee.

On a national level, what is also worth mentioning is the participation in a webinar of the FDP Parliamentary Group, which took place on 27 June 2022. Here the eco Complaints Office was able to provide an assessment of the Commission's proposal and answer questions alongside other experts at an early stage of the political formation of opinions and the legislative debate.

## 6. Public Relations Work

In the year under review, the eco Complaints Office once again continued to undertake the successful public relations work of previous years. The working approaches, achievements and positions of the eco Complaints Office were very successfully communicated to politicians and the press through a wide variety of channels. Aside from the traditional communication events – such as the publication of the annual report, communication related to Safer Internet Day (8.2.2022), and the European Day for the Protection of Children against Sexual Exploitation and Sexual Abuse (18.11.2022) – the main focus of the eco Complaints Office's political communication was a proposal for a "Regulation on laying down rules to prevent and combat child sexual abuse" (the CSAM Regulation), as published in May. With various political papers, press releases, workshops and other

event formats, the eco Complaints Office underscored its position on the EU's draft regulation, drew attention to critical points of content, and was thus able to achieve media coverage at national and international levels.

In 2022, the general media coverage was also very strong, encompassing 410 articles in radio, TV, print and online media. A topic which generated a particularly strong media response centered around tips from the Head of the Complaints Office Alexandra Koch-Skiba at the time of the big summer holiday kick-off. There she highlighted what parents should look out for when posting and sending photos of children. The topic was picked up on by both national and regional media, including RTL, ZDF, Deutsche Presse-Agentur, Focus, Handelsblatt and Redaktionsnetzwerk Deutschland.







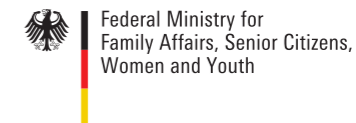
## What can you do?

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](https://complaints-office.eco.de)



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## Legal Notice

### 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

CEO: Harald A. Summa  
Managing Director: Alexander Rabe

**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](mailto:info@eco.de)

[international.eco.de](http://international.eco.de)

