



Council of the European Union
General Secretariat

Brussels, 24 July 2026

Interinstitutional files:
2022/0155 (COD)

WK 10940/2026 INIT

LIMITE

ENFOPOL
JAI
CRIMORG
IXIM
DATAPROTECT
CYBER
COPEN

FREMP
TELECOM
COMPET
MI
CONSUM
DIGIT
CODEC

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

CONSULTATION

From:	General Secretariat of the Council
To:	Delegations
Subject:	Proposal for a Regulation of the European Parliament and of the Council laying down rules to prevent and combat child sexual abuse – Reflection paper on detection obligations / own-initiative searches

Delegations will find in the annex the Presidency note (WK 10939/2026) in a table format for the submission of written comments by **3 September 2026 (cob)**.

A consultation will be launched on the Delegates Portal.

Guidelines to be followed

Please kindly provide your contributions in the table below.

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted**.

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments ondocx**

Thank you for your cooperation!

Presidency compromise text	Comments
General Comments	
1. Do own-initiative searches by providers in public content require any further regulation? If the EP insists on regulating such activities, what limitations, if any, in scope could you accept (known and/or new CSAM)? What benefits do you see to using the EU Centre's database of indicators in the own-initiative search process?	
2. Should the EU Centre be tasked with own-initiative searches in publicly accessible content? Is the reporting structure as set out in Articles 12 and 13 appropriate for own initiative searches by the EU Centre? If not, what else would you recommend?	
3. Should detection orders in public content be established and cover at least known CSAM and possibly new CSAM?	
4. How could the concept of detection orders and own-initiative searches in non-public content targeted to specific users linked to child sexual abuse - taking into account the possibilities offered under national criminal law - work in practice? How could those specific users linked to child sexual abuse be defined, and the targeting process be operationalised in your jurisdiction?	

Regulation laying down rules to prevent and combat child sexual abuse - reflection paper on detection obligations / own-initiative searches

Deadline: *3 September 2026*

Presidency compromise text	Comments
5. Should the Presidency explore other options besides detection orders and own-initiative searches in non-public content targeted to specific users linked to child sexual abuse? If so, what possible options would you envisage?	