



Council of the European Union
General Secretariat

**Interinstitutional files:
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WK 5076/2026 INIT

LIMITE

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MEETING DOCUMENT

From:	Presidency
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 – Presentation on detection

Delegations are provided in the Annex with a presentation made by the Presidency at the meeting of JHA counsellors on 7 April 2026 on the Proposal for a Regulation laying down rules to prevent and combat child sexual abuse.

CSA regulation – *detection* – *issues for reflection*

PUBLIC

WHAT ARE THE DIFFERENT POSITIONS?

Proposal

Order issued by judge or independent administrative authority

HSP or interpersonal communications services (incl. encrypted)

Known, new CSAM and **grooming**

Significant risk of service being used for online child sexual abuse

Council

No orders

Review clause

Voluntary detection by providers of number-independent communications services (**only unencrypted**) for known, new CSAM and **grooming**

EP

Order issued by a judge

HSP or number-independent interpersonal communications (**only unencrypted**)

Known and new CSAM

targeted, specified and limited to individual users/group of users; reasonable grounds of suspicion for a link with CSAM

Review clause

Own-initiative searches for publicly available known CSAM by the EU Centre

DIFFERENT ELEMENTS FOR REFLECTION

PUBLIC

Voluntary/Order

Public sphere (hosting services) vs private (interpersonal communications services)

Known/new CSAM

Grooming

Scanning by EU Centre as complement to any detection

DETECTION IN HOSTING SERVICES

PUBLIC

Known	New	Grooming

Voluntary detection of publicly available CSAM?

Detection orders possible for all services?

EU Centre proactive detection (complementary)?

Connection with 'no general monitoring obligation' under Article 8 DSA?

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INTERPERSONAL COMMUNICATIONS SERVICES

Services could **carry out voluntary activities** to detect, remove and report (mitigation measure)

- Known/new CSAM, grooming?
- Could/should these be limited/targeted and if so, which safeguards should be applied?

Detection orders

- Known/new CSAM, grooming?
- Measure of last resort if the risk assessment and mitigation measures carried out by providers have been found insufficient by CAs?
- Could/should such detection orders be **targeted to (groups of) persons** and/or **limited to specific parts of the provider's system**?

EXAMPLE OF COMBINATIONS (NON-EXHAUSTIVE)

EU Centre
detection on
publicly available
(known)

EU Centre
detection on
publicly available
(known and new)

EU Centre
detection on
publicly available
(known)

EU Centre
detection on
publicly available
(known and new)

Voluntary
detection on
publicly available
hosting platforms

Detection order on
publicly available
hosting platforms

Voluntary
detection on
publicly available
hosting platforms
(known)

Voluntary
detection on
publicly available
hosting platforms
(known and new)

Detection orders
on interpersonal
communications

Voluntary
detection on
interpersonal
communications

Detection orders
on interpersonal
communications
(limitations)

Detection orders
on interpersonal
communications
(known and new;
other limitations)

PUBLIC

thank you