

COMBATING CHILD SEXUAL ABUSE MATERIAL (CSAM) ON THE INTERNET: ACTIONS TO COMBAT ILLEGAL STORAGE AND DISTRIBUTION

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EUROISPA

- Pan-European association of European ISP associations
 - Established in 1997
 - Predominantly funded by its members
 - Largest ISP association in the world: over 1500 ISPs represented
- EuroISPA's structure
 - Council - 11 representatives of national ISP associations
 - EuroISPA Forum - 8 members, all of which are major international Internet companies (The Forum acts as an advisory body to the Council)
 - Secretariat in Brussels - 3 team members
 - Instructed by Council to carry out and coordinate priorities
 - Role as “eyes and ears” re. EU policy and regulatory affairs

THE COUNCIL MEMBERS



AFA - Association des Fournisseurs d'Accès et de Services Internet



AIIP - Associazione Italiana Internet Providers



CZ.NIC - Czech Internet Association



ECO Forum - Verband der Deutschen Internetwirtschaft



FiCom - Finnish Federation for Communications and Teleinformatics



ICT-Norway - Internet Service Providers Association of Norway



ISPA Austria - Internet Service Providers Austria



ISPA Belgium - Internet Service Providers Association Belgium



ISPAI - Internet Service Providers Association of Ireland



ISPA UK - Internet Services Providers Association UK



LINX - The London Internet Exchange

THE FORUM MEMBERS



EUROISPA EXPERTISE

- 4 EuroISPA member associations run their country hotlines directly
 - AFA (France)
 - ISPA Austria
 - ECO (Germany)
 - ISPAI (Ireland)
- EuroISPA is actively involved in the Safer Internet expert group of the European Commission
- All EuroISPA members already cooperate with national LEAs in the fight against CSAM through Notice and Takedown procedure
- EuroISPA closely follows the work of the European Financial Coalition
- EuroISPA has Memorandum of Understanding with INHOPE
- EuroISPA was highly involved in developing the Council of Europe Guidelines for LEA and ISP cooperation

EUROISPA DEPLORES CSAM

- The ISPs whom EuroISPA represents:
 - Abhor the use of their Internet services for storage and distribution of CSAM
 - Do not want this material on their Internet systems in any form
 - Operate the systems and know best ways to fight abuse of their networks
 - Forbid customers to use their systems for storage or distribution of CSAM in their Terms and Conditions
- ISPs can not monitor for this material (law / scale)
- We rely on public reporting to Hotlines and police, so they can rapidly notify us for takedown of the CSAM
Result: definitive removal of the illegal material at source

REMOVING CSAM AT SOURCE

- EuroISPA believes removing material at source is the priority in combating CSAM as it:
 - Makes known sources truly inaccessible
 - Protects children from repeat view victimisation
 - Protects general public by reducing incidence
 - Disrupts activities of paedophiles
 - Disrupts criminal exploitation of children for production of commercial CSAM websites
 - Preserves “taken down” data and logs (for police investigation to trace and prosecute perpetrators)

INTERNATIONAL SYSTEMS

- Rapid notification is key to efficient takedown
- INHOPE has facilitated fast trans-national alerts between hotlines and onward to national LEAs since 1999
- Countries must ensure mechanisms for LEA to rapidly notify hosting ISPs
- Countries must harmonise procedures for preserving the data and securing transfer of evidence

EUROISPA POSITION ON BLOCKING

Blocking is ineffective and should be considered as an action of last resort within a suite of preferable actions aimed at combating Internet CSAM distribution

- Blocking does not remove the CSAM at source
- DNS blocking is easily circumvented allowing the paedophiles - who present the greatest danger to children - to carry on uninhibited
- Blocking does not work against p2p systems
- Accurate hybrid blocking is complex, expensive and impacts the network
- Distribution of blacklists required for blocking is a security nightmare
- Operating blocking systems is a diversion of scarce resources
- Blocking does not bring the criminals to court

ADDRESSING A GLOBAL PROBLEM

- Majority of CSAM is hosted by our main trading partners in the developed world
- EuroISPA advocates diplomatic representation to improve Notice and Take Down communication and cooperation to effectively and efficiently eliminate CSAM at source
 - Harmonisation of approach to notification
 - Adequate processes to rapidly alert an ISP where CSAM is found
 - Agreed ISP action to preserve data in cooperation with police

CONCLUSION

- CSAM must be removed at source
- Blocking is an admission of failure and puts a “mirror” in front of continuing abuse and revictimisation
- Proven mechanisms for alert and takedown exist today but currently delays happen due to partners’ actions and communications being “not fully joined up”
- Effective takedown procedures can and must be achieved by forging national and international protocols to join up existing actions