

Inofficial translation of [German leak](#)

Security Classification: Restricted – For Official Use Only

Date: 5 November 2025

From: Permanent Representation of the Federal Republic of Germany to the European Union

To: Federal Foreign Office

Copy: Federal Chancellery, Federal Ministry of Finance, Federal Ministry of the Interior, Federal Ministry of Justice, Federal Ministry for Economic Affairs and Energy

Subject: 3003rd COREPER (Part 2) meeting of 5 November 2025

Re: Agenda Item 36: (Child Sexual Abuse) Agreement on "way forward"

Purpose: For information

Reference: Pol 350.1.3

DKOR-ID: BRUEEU_2025-11-05_77277

Child Sexual Abuse: Agreement on "way forward"

I. Summary and Assessment

In today's Committee of Permanent Representatives (COREPER) meeting, the Danish Presidency (DNK PRES) received broad support, without opposition, for its proposed way forward (outlined in document [14032/25](#)) on the "Regulation to Prevent and Combat Child Sexual Abuse".

In a forceful appeal, the Commission (COM) thanked all those present who had tried to achieve a different and better outcome. The images and films shared via internet platforms are often the only way for law enforcement agencies to even become aware of child sexual abuse. The affected children are usually too young to understand what is happening to them; moreover, the perpetrators often come from their immediate circle. The technologies used by the companies (within the framework of voluntary cooperation) to detect child pornography material are the same as those used to combat malware and spam: in both cases, there is no insight into content, so one cannot speak of surveillance. There is a veritable flood of images and films on the internet that depict sexual abuse and repeatedly remind the victims of the worst moments of their lives. However, the fact that these images alone constitute a serious violation of the victims' fundamental rights is hardly considered in the discussion. Overall, it is very difficult for the Commission to accept that they have not succeeded in better protecting children from sexual abuse. It is now right and important to move forward, as they are in a race against time. In this context, the Commission explicitly thanked the Danish Presidency for its high pace. Everything must continue to be done to avoid, as far as possible, the deterioration of the current status quo threatened by the expiry of the interim regulation in April 2026 (Greece also stated this). The awareness that time is short and that the trilogues will take time must now also mature in the capitals. With a view to the future, it is important to communicate better on comparable dossiers.

The Chair agreed with these statements and noted that the very media that are now writing against supposedly planned surveillance measures would be the ones to criticize the state tomorrow for not adequately protecting its children.

Several Member States expressed their regret at not having found a better solution (France: "We are a hostage to data protection and have to agree to a path that we actually consider insufficient, simply because we have no other choice"; less drastically also Spain, Hungary, Ireland, Estonia). Some pointed to points of importance to them, without a uniform picture emerging. I (Germany) supported the Danish proposal for the way forward and emphasized, among other things, the great importance of the EU Centre.

Finally, the Chair concluded that there was agreement on the proposed new direction. The Danish Presidency will revise the current legal text accordingly and present it as soon as possible.

II. Recommended Actions

We (Germany) should continue to support the Danish Presidency and, for reasons of time alone, actively advocate that no further changes be made to the already known legal text beyond the innovations agreed upon in COREPER today.

III. In Detail

At the beginning, the Chair outlined the previous, unsuccessful approach along the lines of document [14032/25](#) (available in Berlin) and the resulting proposal to remove mandatory detection orders from the regulation and to include a permanent extension of voluntary cooperation based on the interim regulation. The Chair emphasized that they had hoped for more and were not happy with their own proposal, as it weakens police concerns and thus the protection of children from sexual abuse. However, the possibilities had been exhausted.

Some Member States pointed out points of importance to them: It is important not to make any further deletions beyond the changes proposed by the Danish Presidency, even if the added value of the regulation text is diminished in some places as a result of the removal of mandatory detection orders (France). The bureaucratic burden should be kept as low as possible (Hungary). A duty to detect abuse material should at least be maintained for publicly accessible websites (Spain, Hungary; also the Commission; but rejected by the Danish Presidency, pointing to the associated new questions and the resulting risk of further loss of time).

I (Germany) supported the Danish proposal for the way forward. Germany gives the highest priority to combating child pornography, and making the legal basis permanent while respecting fundamental rights is of great importance. The establishment of the EU Centre will provide significant added value. Following this, the Danish Presidency and the Commission explicitly pointed out that the EU Centre offers added value even without mandatory detection, for example in risk management, in the development of technical measures for risk minimization, in receiving hash values and classifying the corresponding image material as child pornographic, in prevention, and in victim support. In the longer term, it would also be advantageous to achieve European independence from the US-based NCMEC.

Further statements were very brief: Estonia explicitly supported the Danish approach. The Czech Republic stated it had no position due to the new government. Luxembourg and Sweden committed to child protection and stated they would comment further after the legal text is presented.