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POSITION PAPER

on the Call for Evidence for an “EU Civil Society Strategy”

Cologne/Berlin, 4 September 2025

The European Commission has published a call for evidence for the initiative to develop an EU Civil Society Strategy. The strategy aims to support and protect civil society organizations and promote dialogue with them. Through this consultation, the Commission is giving stakeholders the opportunity to provide feedback.

eco welcomes this opportunity to comment on the initiative. Non-governmental organizations (NGOs) play an important role, particularly with regard to self-regulation in the area of protecting minors online and tackling illegal content on the Internet. Thus, protecting NGOs is an important issue for eco and its members.

eco would like to address individual topics - based on the experience of its members as well as its own experience as the operator of a hotline for reporting illegal content online (eco Complaints Office).

For almost 30 years, eco has been operating its hotline dedicated to combatting illegal and youth-endangering content. The eco Complaints Office serves as a point of contact for users and plays an active role in the removal of illegal content.

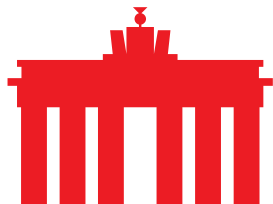
• Scope of the Strategy

NGOs are typically considered to be independent organizations that work towards social, environmental, or human rights goals without seeking to make a profit. eco suggests that activities or initiatives similar to those of NGOs, such as hotlines, should also be considered in the strategy.

Hotlines act as a bridge between users and online services, fulfilling a function that is also often taken on by NGOs.

Not only do hotlines work in the public interest to protect children and young people, they also serve as the first point of contact for citizens when they encounter illegal content online, particularly child sexual abuse material (CSAM). To underline this thesis, eco would like to give some examples in regard to the role and activities of the German hotlines.

In 2024, for example, the German Federal Criminal Police Office received 99% of all information on URLs with child sexual abuse material from domestic hotlines (see the German Governmental Report on NTD measures in 2024; https://www.bmjjv.de/SharedDocs/Downloads/DE/Fachpublikationen/Loeschbericht_2024.pdf?__blob=publicationFile&v=3).



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In addition, hotlines are responsible for notifying providers of online services of illegal content and initiating its removal (known as 'notice-and-takedown' measures). In this way, hotlines serve as intermediaries between the public, law enforcement agencies and providers of online services.

The eco Complaints Office focuses on protecting minors in the media. In particular, it is strongly committed to combatting CSAM and aims to protect children and young people comprehensively from sexualised violence in the digital space.

The Complaints Office is also committed to combatting anti-constitutional content. This includes criminal offenses such as incitement to hatred or dissemination of propaganda material of unconstitutional organizations. The eco Complaints Office aims to remove criminal content from the digital space while respecting and safeguarding freedom of expression. By doing so, the Complaints Office contributes to the reinforcement of fundamental democratic values. Therefore, hotlines are actively committed to promoting and protecting EU values.

From eco's perspective, it is therefore consistent to include organizations or initiatives such as hotlines in the EU civil society strategy.

- **The Role of NGOs in self-regulation**

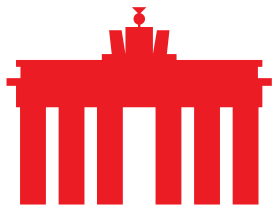
NGOs play an important role in the self-regulation of digital spaces. They facilitate dialogue between civil society, the private sector and policymakers, and contribute significantly to awareness-raising and educating the public. With the view on hotlines, they also notify illegal content to the service providers and thus support self-regulation measures.

The establishment of defined trusted partner structures can encourage collaboration between NGOs and companies. Involving NGOs and initiatives comparable to NGOs in self-regulatory processes enhances the effectiveness of such models and ensures greater legitimacy, transparency and balance when addressing societal and fundamental rights concerns in the digital space.

- **Protection from repression**

eco expressly supports the approach outlined in the initiative to better protect NGOs from repression. In eco's view, a transparent and proactive information policy is key in this regard. Providing early and transparent information about the legal framework can help prevent public misunderstandings and built trust across society.

A current example of this is the introduction of the trusted flagger status under the Digital Services Act (DSA), which gives organizations with special expertise and experience in identifying and reporting illegal content a prioritised reporting



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channel. Platforms are obliged to prioritise reports from such trusted flaggers and process them quickly.

In Germany, the initial approvals sparked discussions, some of which were accompanied by protests and misinformation. These reactions could probably have been avoided through clearer, more fact-based communication about the content and scope of the trusted flagger status. In particular, it is important to emphasise that this status does not grant additional powers to interfere with fundamental rights, such as freedom of expression. Rather, it ensures the quality and efficiency of verified reports and contributes to the enforcement of existing legal standards.

A comprehensive EU information and education strategy could help to protect NGOs more effectively without creating additional regulatory barriers.

- **Existing structures and synergies**

Existing structures should be acknowledged and built on as part of an effective civil society strategy. There is no need to create new systems when proven approaches already exist. Instead, existing networks should be developed further and integrated into the strategy. Synergies should be exploited in a targeted manner.

In this context, establishing and promoting networks and umbrella organizations can also be helpful.

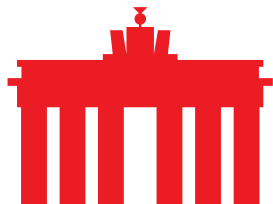
Initiatives such as INHOPE, an international network of hotlines combatting CSAM, demonstrate how transnational cooperation between hotlines can be organized effectively.

eco is an active founding member of INHOPE and promotes the exchange of best practices and constructive international cooperation through joint agreements. Membership of such networks benefits not only the individual member organizations but also strengthens the EU's effectiveness and credibility in a global context.

- **Funding**

A key concern for many NGOs is securing long-term funding. eco therefore welcomes the fact that the EU initiative addresses this issue. Targeted and reliable funding programmes can contribute significantly to stabilising and further developing the work of NGOs and similar organizations.

In this regard, clearly defined funding objectives, transparent eligibility requirements and comprehensible allocation of funds are crucial, as they create security and reliability for planning purposes. At the same time, a transparent timeframe for the funding process is also important. Public and binding timetables for the publication of calls for proposals, submission deadlines and funding decisions are essential for forward-looking project and resource planning. A reliable



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and accessible funding timeline therefore directly contributes to the effectiveness and capacity of NGOs to act. In case of plans to reduce funding, such information should also be communicated in a timely manner, so the affected organizations have the chance to search for compensation.

eco knows from own experience how essential financial support is, both for the organization itself and for the EU. Without interfering too much with the autonomy and independence of NGOs or activities similar to those from NGOs, EU funding can ensure that quality standards are met. For instance, EU hotlines are co-funded by the EU which secures their operations. To receive EU funding, hotlines must be INHOPE members. INHOPE, in turn, establishes minimum standards for hotlines and verifies their compliance through a Quality Assurance Programme. This ensures a consistently high quality of service.

- **Political Participation**

eco advocates the political participation of NGOs. Transparent participation procedures already exist at the EU level, as can be seen from this consultation. These procedures allow NGOs to participate actively in political decision-making processes, albeit indirectly. From eco's perspective, this status quo provides a solid basis for political participation.

About eco: With approximately 1,000 member companies, eco (international.eco.de) is the leading Association of the Internet Industry in Europe. Since 1995, eco has been highly instrumental in shaping the Internet, fostering new technologies, forming framework conditions, and representing the interests of its members in politics and international forums. eco has offices based in Cologne, Berlin and Brussels. In its work, eco primarily advocates for a high-performance, reliable and trustworthy ecosystem of digital infrastructures and services.