

Annual Report

2024

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Foreword

Dear Readers,

The year 2024 was once again a time of intensive work for the eco Complaints Office. The Complaints Office team reviewed 25,893 reports regarding potentially criminal or youth protection-related Internet content. The consistently high number of complaints in the area of sexualized violence against children and young people particularly underscores the vital importance of the work carried out by complaints offices (also known as “hotlines” in international contexts).



Alexandra Koch-Skiba
Head of eco Complaints Office

The reports received by the Complaints Office reflect the issues that are perceived as problematic within society. Fluctuations across specific areas of concern are therefore not uncommon. Looking back at the topics discussed in society in 2024, it is not surprising that we recorded a significant increase in reports concerning potentially anti-constitutional content in the reporting year. The heightened public sensitivity also meant that the Complaints Office determined legal violations in only around 1% of these cases. This is because legal assessment in this complex area is particularly challenging – especially as freedom of expression is particularly important.

Overall, we identified a legal violation in 42% of the cases and were consequently able to encourage the take-down of the relevant content. Once again, this was highly successful: following our correspondence, around 99% of the reported content was removed.

Challenges in the digital space and in dealing with illegal content have intensified. In addition to the known phenomenon areas, other issues such as propaganda strategies, the spread of disinformation and technologies such as deepfakes (to name just a few examples) are now also being reported to the hotlines and service providers. It is important here to clearly differentiate when dealing with such reports: What is legally prohibited and should lead to content removal – and what is legally permissible but should nevertheless be addressed with a view to promoting social harmony and be part of media literacy measures? This distinction is also relevant with regard to enforcing the provisions of the Digital Services Act, which is currently still in the early stages of practical application.

The distinction between permissible statements and criminal content is therefore becoming increasingly vital. At the same time, it is increasingly difficult, requiring a precise and differentiated approach – a challenge that we are fortunate to be able to tackle every day, thanks to our almost 30 years of expertise.

Given the complexity and international nature of the digital landscape, it will be crucial in the future to strengthen self-regulatory systems and intensify cooperation between educational institutions, politicians, civil society, law enforcement agencies, supervisory bodies, and the IT industry. Only through this close cooperation can we create a safe, democratic digital space that strengthens values such as protection, education, and social participation, and rises to meet the challenges of the digital world.

Another central aspect remains the promotion of media literacy, especially among children and young people. It is essential to raise awareness among the youth at an early stage and in a sustainable manner about the critical handling of digital content. The children and young people must learn to question information and move safely and responsibly in the digital space. At the same time, adults must not be overlooked. They need to be empowered to pass on their experience and knowledge to younger generations in order to promote safe handling of digital content. As a result, disinformation, for example, can then have less impact and be weakened in its effect.

In this context, the eco Complaints Office will continue to play a key role in the fight against illegal content on the Internet: as a contact point for Internet users, through collaboration with international partners and relevant stakeholders, and

in terms of legal education – particularly in the area of digital and civic education for adults and professionals.

Within eco – Association of the Internet Industry, which is now looking back on 30 years of experience, we are aware of our responsibility to help shape the digital world and to continuously work toward a safe and respectful online environment. Accordingly, we are happy to contribute our expertise to various committees and initiatives – whether through direct participation of the eco Complaints Office team or through supporting information for other eco activities, such as the work of the DSC Advisory Board, which regularly draws on the experience and insights of the eco Complaints Office.

I look forward to continued collaboration with our team, with our partners, and with all those who are committed to a safe and democratic digital space.

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1. Introduction & Overview of Developments

eco Complaints Office: Dedicated to combatting illegal content on the Internet

The eco Complaints Office (complaints-office.eco.de) has been fighting illegal content on the Internet since 1996. It is embedded in the system of regulated self-regulation and has, in particular, the task of improving and promoting youth protection on the Internet.

The Complaints Office team is composed of seven employees with a legal background, with these including the Head of the Complaints Office, three Consultants, and three Content Analysts.

Internet users can make a free and anonymous report on youth-endangering and prohibited content at

- complaints-office.eco.de
- internet-beschwerdestelle.de/en/index.html
(a joint portal operated by eco and FSM)
- E-Mail to hotline@eco.de

In addition, in 2024 the eco Complaints Office continued to support JUUUPORT, an advice and help platform for young people. Reports of illegal content submitted via juuuport.de/melden were processed in cooperation with the hotlines of FSM and jugendschutz.net.

In order to effectively fight illegal online content, collaboration with other relevant players is essential. The eco Complaints Office therefore cooperates with, among others, providers, partner hotlines, and law enforcement agencies. eco is also a founding member of the International Association of Internet Hotlines (INHOPE), an international

network that supports hotlines worldwide. In addition, eco is part of the German “Safer Internet Centre.”

“Cybercrime is a growth market. The more economic, political, social, and societal life shifts to the Internet, the more diverse the digital threat scenarios become. Effective law enforcement relies on strong cooperation. In combatting illegal content on the Internet, hotlines are particularly important partners. The long-standing and trusting collaboration between the eco Complaints Office and the Central Bureau and Contact Office for Cybercrime North Rhine-Westphalia (ZAC NRW) proves the effectiveness of this comprehensive approach.”

Markus Hartmann
Senior Public Prosecutor, Head of the Central Bureau and Contact Office for Cybercrime North Rhine-Westphalia (ZAC NRW)

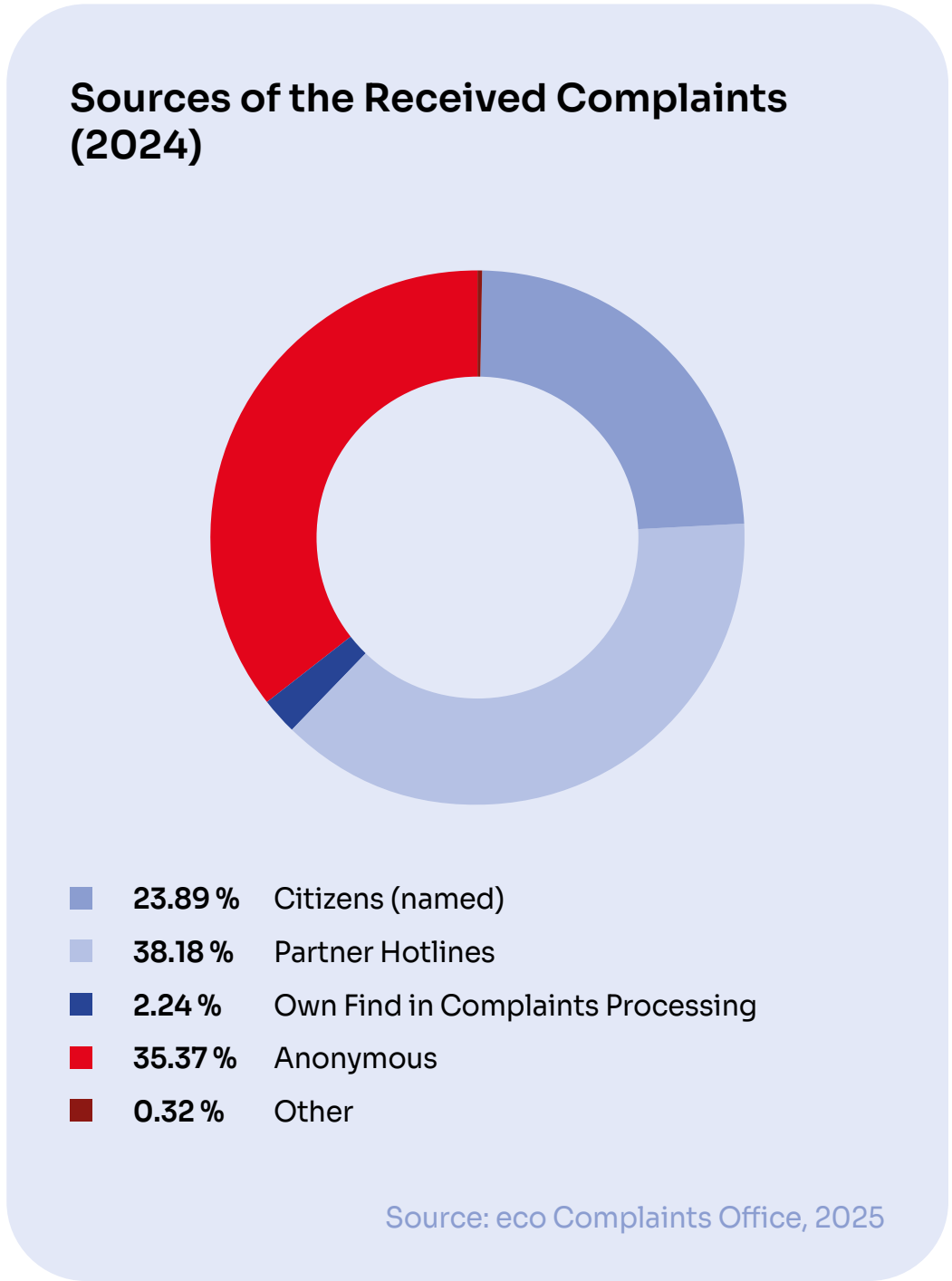
In all of this, the eco Complaints Office serves as a model for neutral and transparent processes and acts as the contact partner for association members, the state, society and politics.

Simply and anonymously: Submitting a complaint

The eco Complaints Office accepts complaints regarding all Internet services: the world wide web, online forums and mobile content/applications/platforms, emails, file-sharing platforms and peer-to-peer networks, messaging services, and Usenet communities. The content can be hosted on servers either within or outside of Germany (the home country of the eco Complaints Office) and can be reported by all Internet users. The provision of personal data is optional, which also allows a report to be made anonymously.

In the reporting year, many people once again made use of the option to report illegal content anonymously to the eco Complaints Office: a good third of the reports were received without any personal data from the complainants.

Compared to the previous year, three noteworthy shifts in the sources of reports can be observed: while the proportion of anonymous reports decreased, the proportion of named reports and reports from INHOPE partner hotlines has increased. The shifts regarding anonymous versus named reports could indicate that more and more citizens feel confident enough to submit reports under their own names. This may be due to increasing reliability and trust in the eco Complaints Office’s reporting process, as well as greater awareness among complainants regarding the data protection measures in place.



The increase in reports received via the INHOPE network likely correlates with the fact that the proportion of German cases also rose during the reporting year, which accounted for about two-thirds of cases. Through the INHOPE network, the eco Complaints Office primarily receives reports about content hosted in Germany.

What kind of illegal content does the eco Complaints Office deal with?

Incoming complaints initially undergo a comprehensive legal assessment. The eco Complaints Office's assessment standard concentrates on youth media protection and related criminal offenses. In particular, in the course of this process, the eco Complaints Office handles complaints related to the following illegal Internet content, which are considered actionable complaints as soon as the conditions of these offenses are met:

Sections 4, 5 German Interstate Treaty on the Protection of Minors in the Media (JMStV), youth-endangering and developmentally impairing content, and the corresponding criminal regulations:

Section 184 et seq. German Criminal Code (StGB), Ffreely accessible adult pornography, pornography depicting violence, animals, children or juveniles

Section 86, 86a StGB, Dissemination of symbols and propaganda material of unconstitutional organizations

Section 130 StGB, Incitement to hatred

Section 130a StGB, Attempting to cause the commission of offenses

Section 131 StGB, Depictions of extreme violence

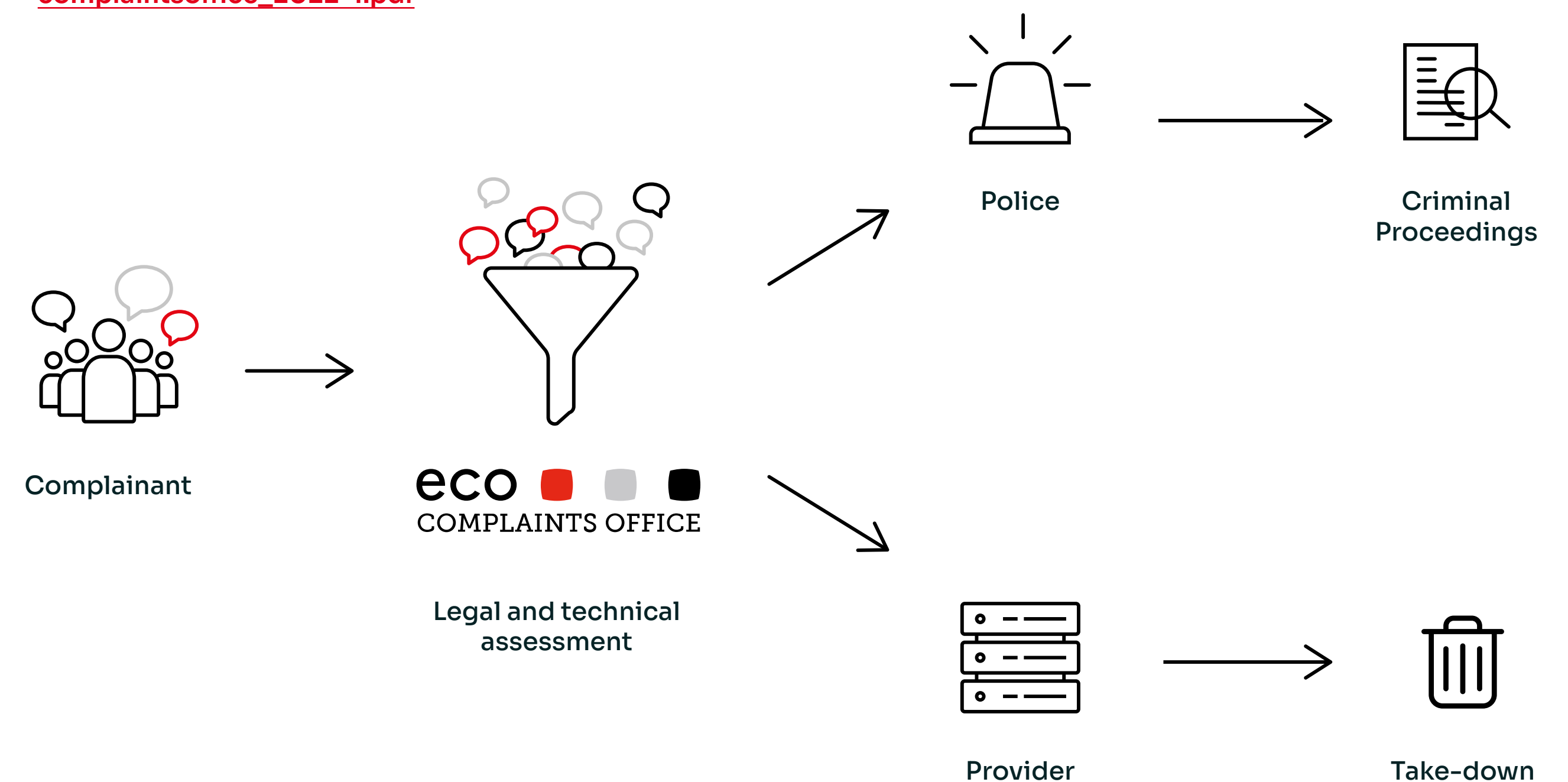
Section 176b StGB, Grooming

Section 201a StGB, Dissemination of naked images of minors for profit

Section 111 StGB, Public incitement to crime

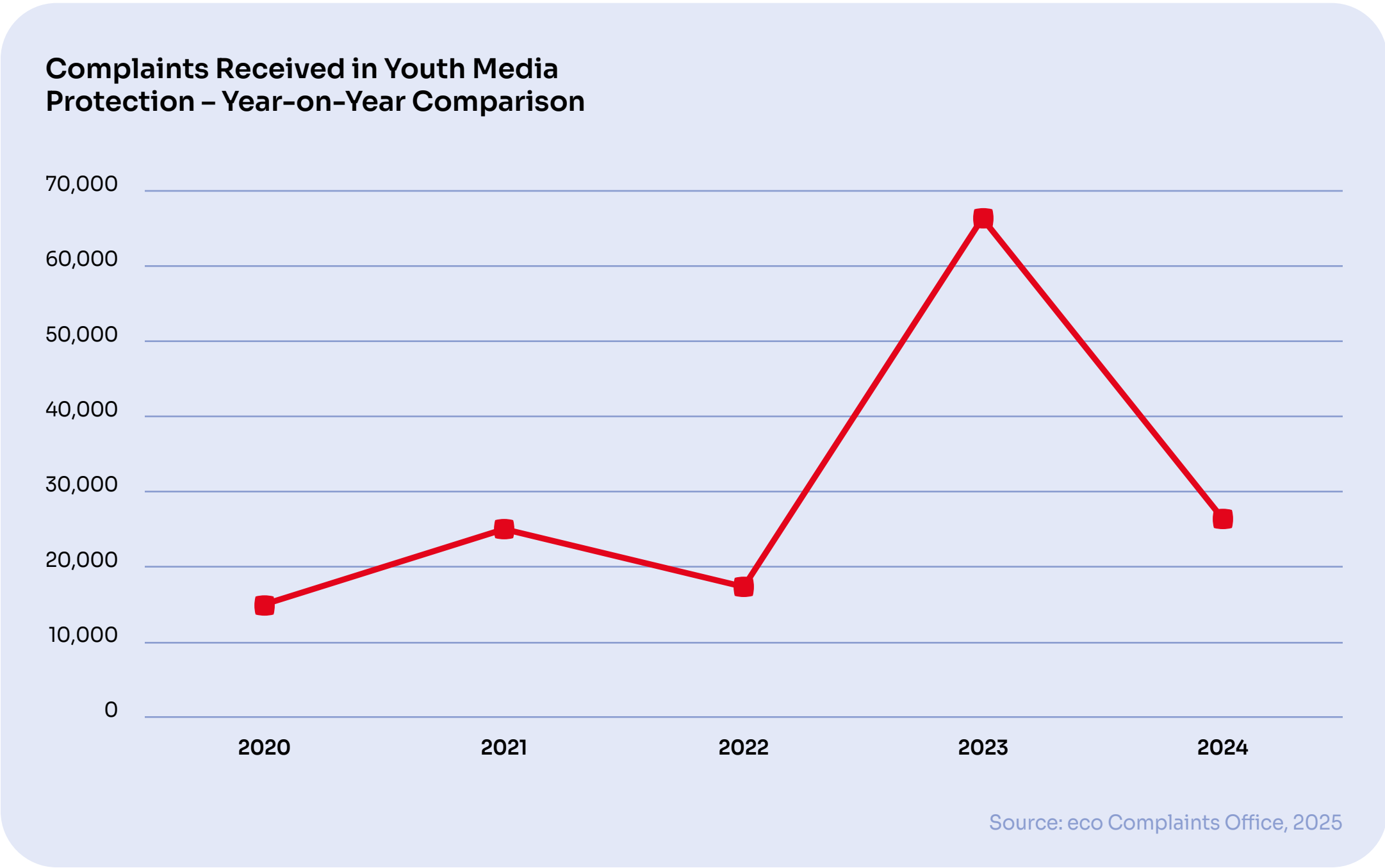
In addition, the eco Complaints Office handles reports on the unsolicited sending of marketing emails and newsletters.

➤ Information and definitions of the various offenses can be accessed online at: international.eco.de/wp-content/uploads/dlm_uploads/2022/03/legalbasis_complaintsoffice_2022-1.pdf

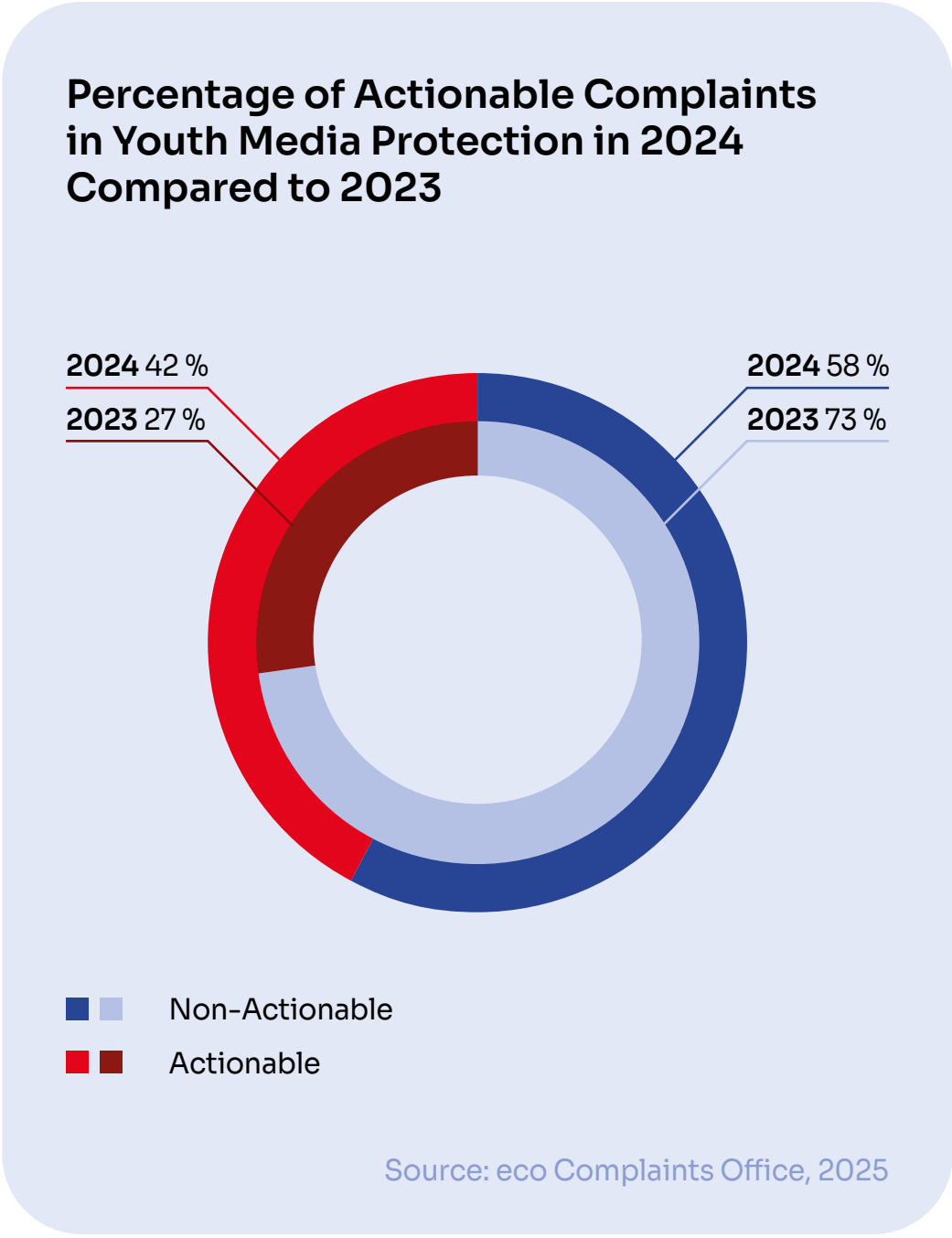


Overview of complaints received in 2024 related to youth media protection

In the reporting year, the eco Complaints Office received a total of 25,893 complaints regarding potentially criminal or youth media protection-relevant Internet content.



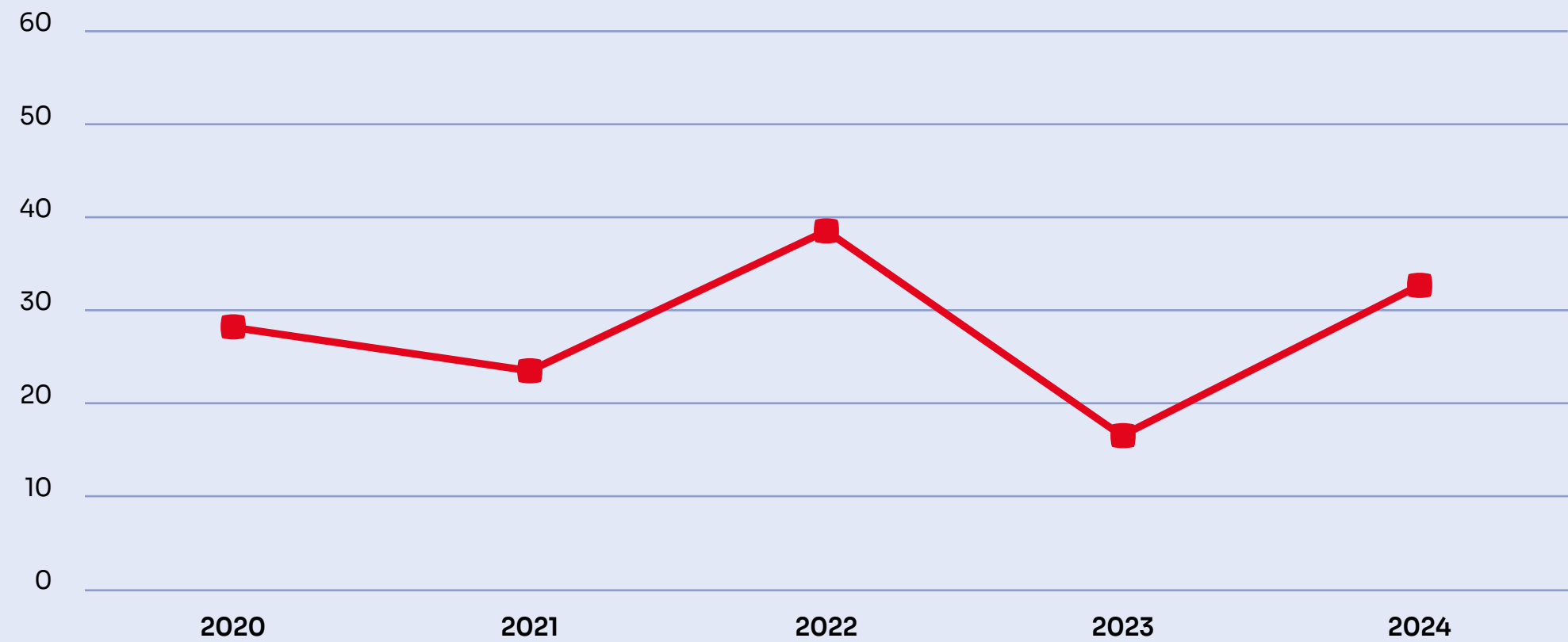
Slightly less than half (42%) of the complaints received in the reporting year were actionable for the eco Complaints Office (“actionable complaints”). Compared to the previous year, the proportion of actionable complaints thus increased by 15 percentage points.



A complaint is considered as actionable if a violation of the law is detected, and measures are taken subsequent to an assessment. As a matter of principle, measures are taken for every violation of the law, unless the eco Complaints Office is reasonably confident that the necessary measures have already been taken (e.g., reports to the police and to the eco Complaints Office in a joint email, knowledge of measures taken by partner hotlines, duplicate reports, etc.).

The proportion of actionable complaints has been consistently below 50% for years and varies from year to year without a clear upward or downward trend. These fluctuations are not unusual, as complaints depend on various factors, including current events and the often challenging assessment of complex legal criteria.

Percentage of Actionable Complaints – Year-on-Year Comparison

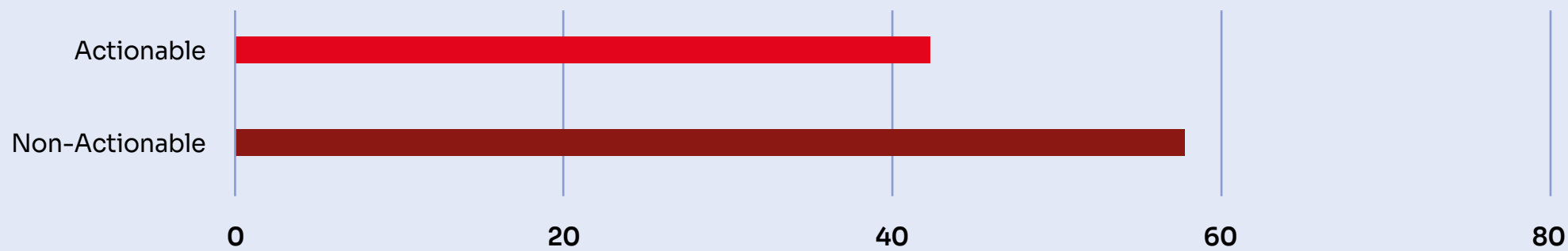


Source: eco Complaints Office, 2025

Just under 58% of the complaints received in 2024 were classified as non-actionable. A complaint is considered non-actionable if the reported content is not legally relevant, falls outside the jurisdiction

of the eco Complaints Office, or is a duplicate. Cases are classified as duplicates if they are already known and are being processed at the time of reporting.

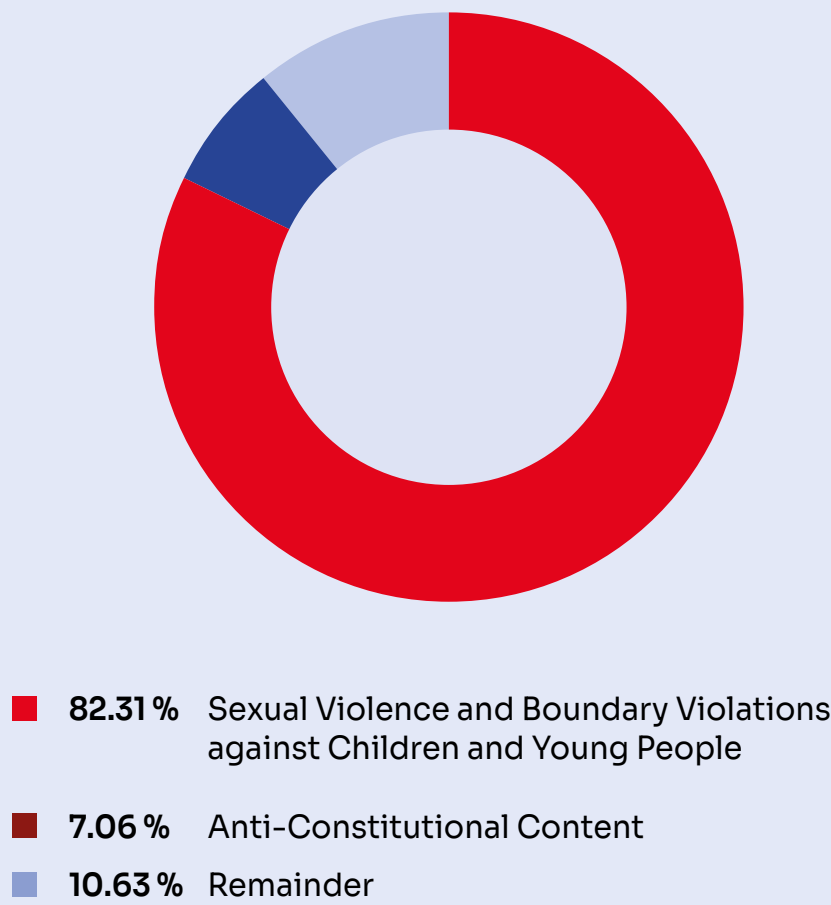
Ratio of Complaints Received to Actionable Complaints (2024)



Source: eco Complaints Office, 2025

As in previous years, the majority – around 82% – of the complaints received in the reporting year in the area of youth media protection related to the topic of “sexual violence and boundary violations against children and young people,” in particular depictions that were legally classified as Child Pornography* as defined in Section 184b of the German Criminal Code (StGB).

Received Complaints in the Field of Youth Media Protection (2024)



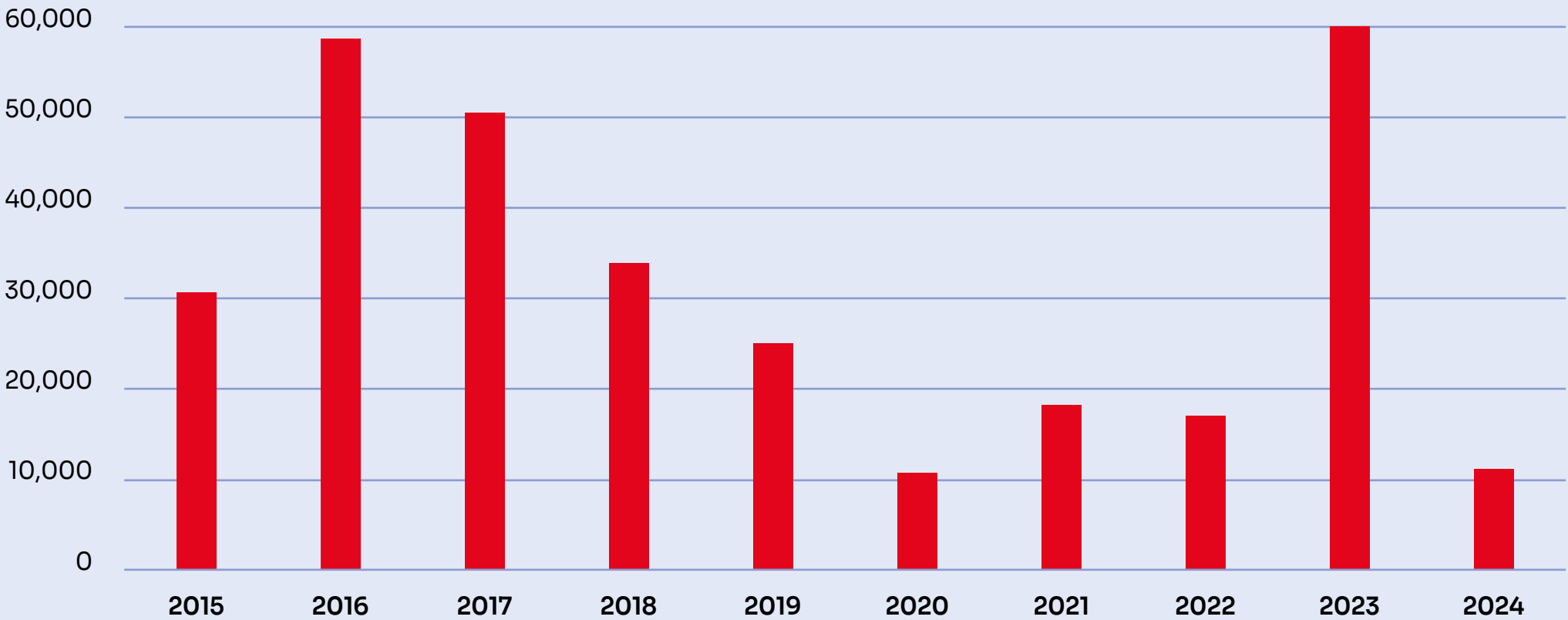
Source: eco Complaints Office, 2025

The offense of Child Pornography comprises depictions of sexual acts on, by, or in front of children, depictions of partially or completely naked children in a suggestive sexualized pose, and the sexually provocative reproduction of the naked buttocks or genitalia of children.

Under German law, so-called “Posing depictions” may not be distributed online. This includes images of minors in unnatural or sexually suggestive body poses. Depending on the age of the person shown and the kind of depiction, such content may constitute a violation of media law (Section 4 (1) 9, German Interstate Treaty on the Protection of Minors in the Media (JMStV)), or is punishable as Child Pornography or Youth Pornography (Section 184b (1) 1b and Section 184c (1) 1b, German Criminal Code).

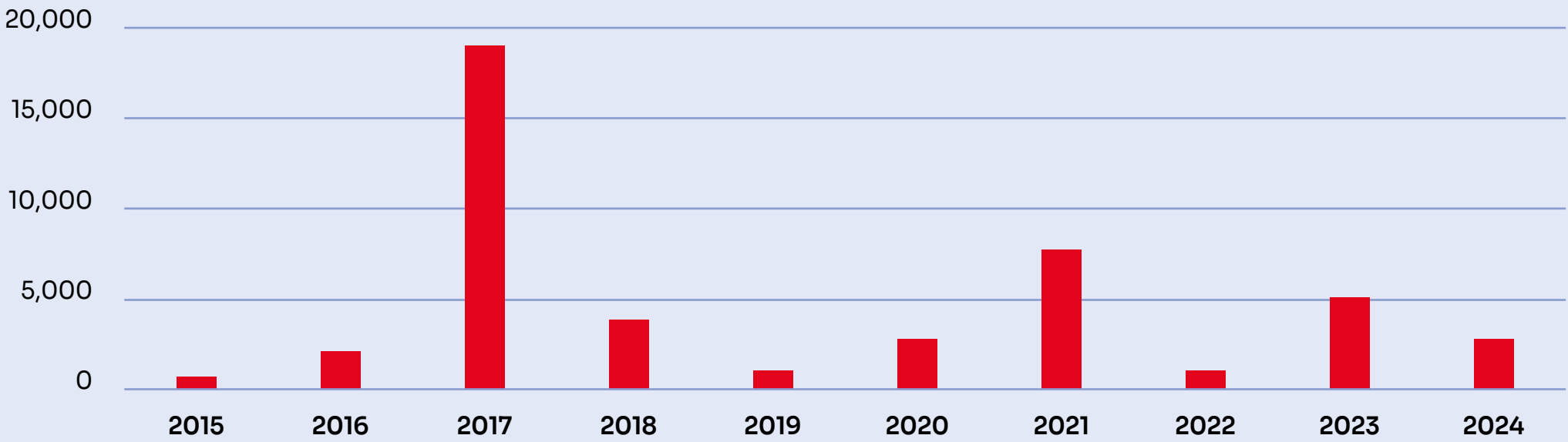
10.63% of actionable complaints fell into the category named as “other content,” as defined in the overview. This includes, for example, adult pornography, depictions of violence, serious harm to young people, and development impairments.

Received Complaints About Sexual Violence against Children and Young People – Year-on-Year Comparison



Source: eco Complaints Office, 2025

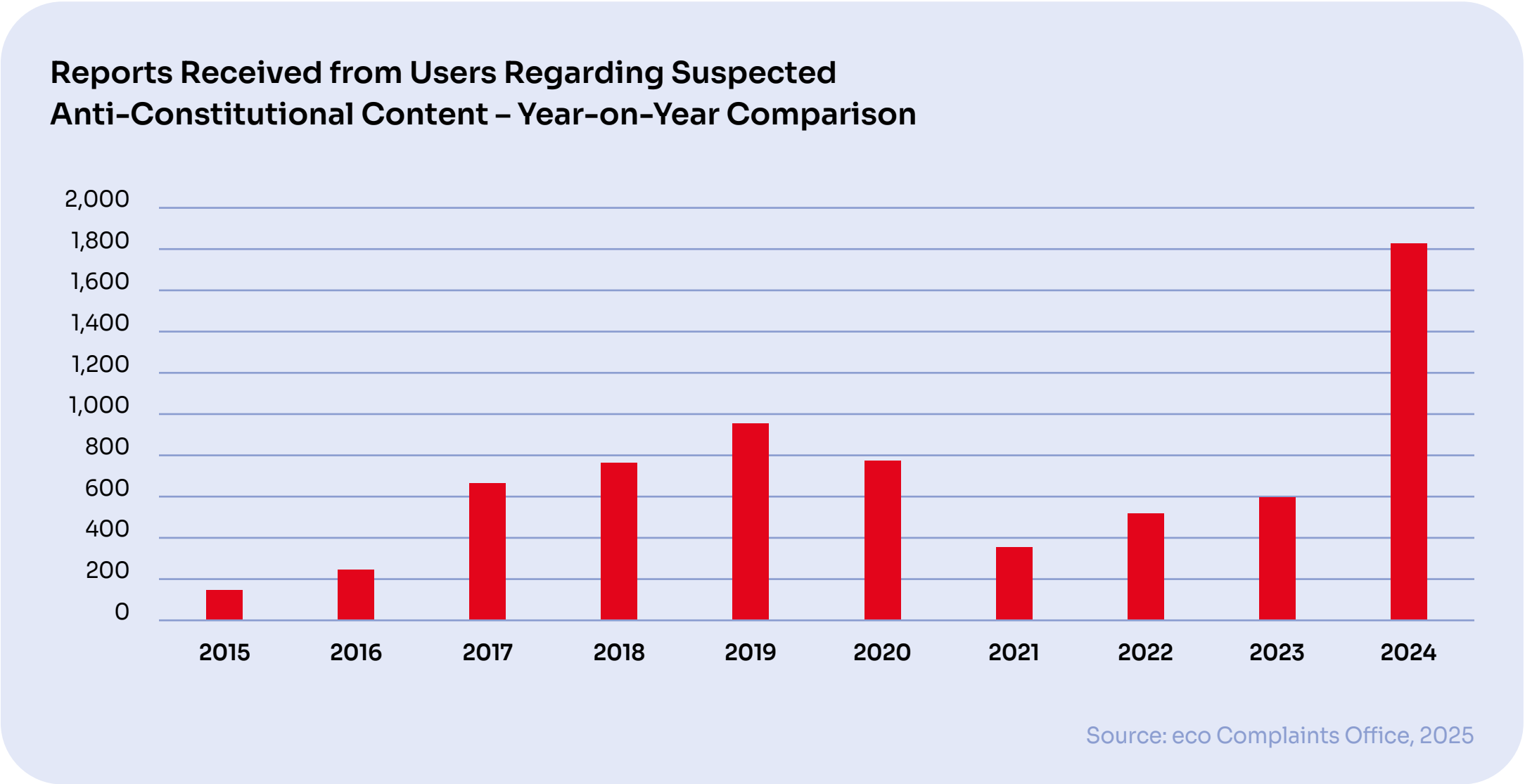
Actionable Complaints About Other Content in the Area of Youth Media Protection Not Related to Sexual Violence Against Children and Young People or Anti-Constitutional Content



Source: eco Complaints Office, 2025

* In the Annual Report, this “terminus technicus” of the legal text is used when referring to depictions of abuse of children as defined in Section 184b of the German Criminal Code (StGB). This is not intended as an explicit endorsement of the terminology, but serves solely to differentiate between the individual offenses in the field of depictions of sexual abuse and sexual exploitation of minors. Capitalized terms such as Child Pornography are terms derived directly from German law.

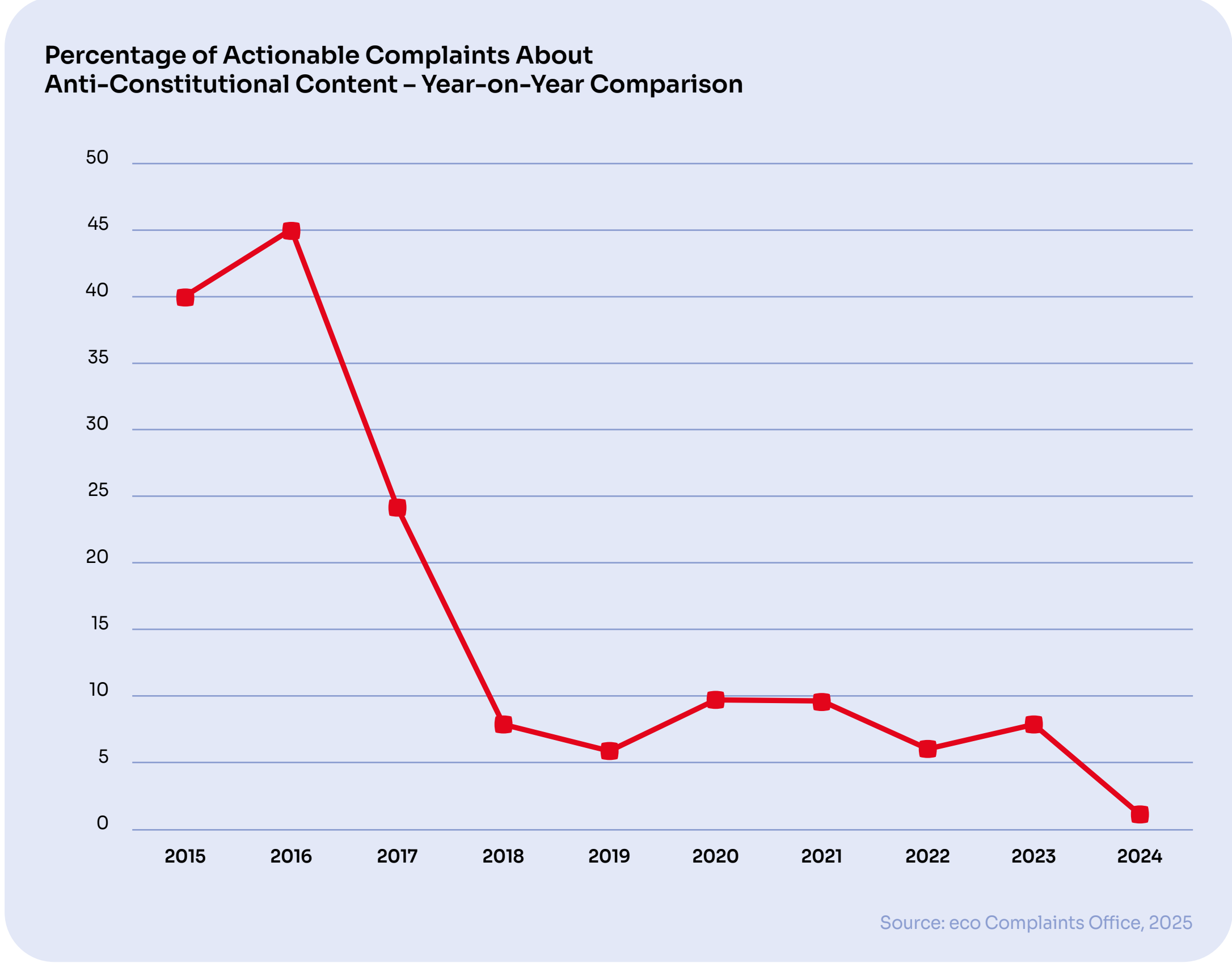
With regard to reports of anti-constitutional content, there was a significant increase recorded in this year, with 1,828 cases (7.06%), representing the highest level since data collection began. For comparison: In the previous year there were only 590 cases.



However, only 1.15% of these reports were legally relevant. This could indicate that many of the reports were based on misunderstandings, possibly due to increased sensitivity to anti-constitutional content – even though such content is not always legally relevant or may ultimately be protected under freedom of expression.

The eco Complaints Office primarily classifies the following offenses as “anti-constitutional content” (in the broad sense): Incitement to hatred

(Section 130 StGB), Dissemination of propaganda material of unconstitutional organizations (Section 86 StGB), Use of symbols of unconstitutional organizations (Section 86a StGB), Disparagement of state and denigration of symbols (Section 90a StGB), Disparagement of constitutional organs (Section 90b StGB), Forming criminal and terrorist organizations (Sections 129 et seq. StGB), Revilement of religious faiths (Section 166 StGB), and Defamation directed at persons in political life (Section 188 StGB).



The fluctuations in the types of content reported reflect, among other things, the different societal and media developments that can influence the nature and frequency of such reports.

In this context, the growing significance of fake news, deepfakes, and hate speech is increasingly being discussed. In some cases, this content can contribute to spreading misinformation, intensifying societal tensions, and undermining trust in democratic institutions. Such content often spreads through campaigns with political or ideological goals, particularly on social media. Deepfakes, for example, can falsify supposedly trustworthy pieces of evidence, which can call the credibility of information into question.

At the same time, the line between drastic and possibly provocative opinions, legitimate criticism, and illegal content is not always clear. This can result in certain content being perceived as anti-constitutional, even though it is not legally relevant. Increasing polarization and growing pressure for rapid opinion formation can also contribute to legally harmless content being perceived as problematic and reported.

The challenge lies in promoting the exchange of ideas and the handling of different points of view, protecting freedom of expression, while still ensuring that discourse remains fair and balanced in order not to violate the rights of third parties and to preserve the fundamental values of democracy.

“The digital public sphere moves between freedom of expression and the challenges of disinformation. While it is not easy to establish a causal link between social media and its effects on democratic self-determination processes, one thing is certain: our democracy is more resilient than often assumed. Structural changes in political communication – fear of the future, change fatigue, data-driven platform business models – have a greater impact on public discourse than fake news. Nevertheless, we should not sit back and relax: democratic discourse can only succeed if groups are not too polarized and there is a sufficient level of information and media literacy.“

Prof. Dr. Matthias C. Kettemann, LL.M.
(Harvard), Humboldt Institute for Internet and Society, Berlin

Frequently used terms in the context of anti-constitutional content

Terms that are associated with or used in connection with anti-constitutional content are often understood, perceived, or interpreted differently in legal and societal contexts. This leads to a central challenge, as the boundary between permissible expression of opinion and legally prohibited content is sometimes blurred, making it difficult to handle and assess such content.

In the field of disinformation, where deliberately false or manipulative content is spread, such delineation is also complex because it requires concrete assessment in each individual case. Since disinformation is not illegal per se, it must be carefully examined whether it crosses the threshold into the dissemination of prohibited content. This requires a differentiated assessment of the intent, the effects, and the context in which the information is spread, in order to ensure an appropriate balance between the protecting freedom of expression and maintaining constitutional order.

For the legal and societal handling of potentially anti-constitutional content, it is therefore crucial to precisely distinguish and classify the key terms. It is also important to differentiate between “strategies” and “tools,” which are frequently found in the context of anti-constitutional content.

Strategies: Long-term goals of influence

The strategies used aim to influence public awareness, spread certain ideologies, or deepen societal divisions. They relate to overarching, long-term goals that are pursued through means and methods in order to bring about political or societal change. Examples include:

1. Extremism

The term “extremism” is not without controversy. It is mostly used as a collective term for political attitudes that reject or actively combat the fundamental values of democracy. This refers to attitudes and movements that are directed against freedom, equality, diversity, and the rule of law. Even if the term is not always clearly defined, the lowest common denominator is that extremism refers to political convictions that endorse violence, exclusion, or dictatorship and are directed against the democratic constitutional order. (Sources: German Federal Office for the Protection of the Constitution (BfV), and German Federal Agency for Civic Education (bpb))

2. Populism

Populism is a political stance that sees itself as representing the “true” people and often features fears or simple solutions to complex problems. Populists claim to represent the will of the majority, even though society is diverse. Conspiracy theories are also frequently spread, portraying political or societal crises as the result of secret machinations by an elite. While populism usually relies on the will of the people, extremism can represent more radical, undemocratic views and lead to violence or the rejection of democratic principles. Populist movements can become radicalized, but not all forms of populism are extremist. It is important to note that there is no uniform

scientific or political definition of populism – the term is used and interpreted differently depending on the context. (Source: German Federal Agency for Civic Education (bpb))

3. Propaganda

Propaganda refers to the dissemination of political, religious, or other convictions – whether in writing, orally, or via electronic media. Its goal is often to influence public opinion, either within a state or across other states, in order to elicit a desired reaction or attitude. The truthfulness of the message is not the central issue here, but rather on the strategic selection and manipulation of information. The term has a negative connotation and is frequently associated with the political manipulation employed by authoritarian and totalitarian regimes. According to Article 20 of the International Covenant on Civil and Political Rights, war propaganda and propaganda that incites hatred, discrimination, hostility, or violence must be prohibited by law. (Sources: German Federal Office for the Protection of the Constitution (BfV), and German Federal Agency for Civic Education (bpb))

→ Extremism, populism, and propaganda are not per se to be qualified as legally prohibited strategies or behaviors. However, depending on the content and concrete design, the threshold to illegality may be crossed in individual cases.

Tools: Means of implementing strategies

Tools are specific means used to achieve the strategic goals outlined above. These tools can take the form of information or specific communication methods and are deliberately designed to influence public opinion, create enemy stereotypes, or intensify social tensions.

1. Dissemination of anti-constitutional content

Anti-constitutional content is directed against core principles of the constitution such as human dignity, democracy, and the rule of law. It includes various forms of threats or destabilization of the state order and the fundamental values of society.

Hate speech

Hate speech includes derogatory, discriminatory, or violence-glorifying statements directed at individuals or groups. It violates societal values such as the protection of human dignity and may be punishable under criminal law, especially if it is classified as incitement to hatred (known in Germany as “Volksverhetzung”), insult, defamation, or similar offenses. Not every form of hate speech is therefore automatically punishable or prosecutable under media law. Whether a statement is illegal depends on various factors, such as the context, the severity of the statement, and the legal classification, taking into account freedom of expression.

Incitement to hatred (“Volksverhetzung”)

According to Section 130 of the German Criminal Code (StGB), incitement to hatred refers to public incitement to hatred or the call for violent and arbitrary measures against a specific group of people based on their ethnic origin, religion, sexual orientation, or other protected

characteristics. The goal is to spread hostility. This also includes the denial of the Holocaust and similar historical facts that are likely to disturb public peace.

▪ **Dissemination of propaganda material and use of symbols of unconstitutional and terrorist organizations**

Sections 86 and 86a of the German Criminal Code (StGB) make it a criminal offense to disseminate propaganda material from unconstitutional organizations or to use their symbols, if these organizations represent goals or ideologies that are directed against the free democratic basic order. This includes, in particular, symbols, slogans, writings, and other media that serve to spread extremist or anti-constitutional ideologies.

▪ **Defamation of the state and its symbols**

Section 90a of the German Criminal Code (StGB) regulates the punishment for publicly insulting or disparaging the Federal Republic of Germany, its federal states, or its constitutional order, as well as the defamation of national flags, coats of arms, and anthems. The removal or damage of national symbols is also punishable.

2. Disinformation and digital manipulation

Disinformation refers to the deliberate dissemination of false or misleading information intended to deceive people or manipulate their opinions. It can take various forms and be spread through different means. Disinformation does not always take place exclusively online, and not every form of disinformation is automatically punishable by law. Whether an act is relevant under criminal law depends on various factors, such as the intention, the harm caused by it, and the legal classification of

the disseminated information, taking into account the right to freedom of expression.

▪ **Fake News**

Disinformation refers to the deliberate dissemination of false or misleading information intended to deceive people or manipulate their opinions. It can take various forms and be spread through different means. Disinformation does not always take place exclusively online, and not every form of disinformation is automatically punishable by law. Whether an act is relevant under criminal law depends on various factors, such as the intention, the harm caused by it, and the legal classification of the disseminated information, taking into account the right to freedom of expression.

▪ **Deepfakes**

Deepfakes are audio, image, or video recordings manipulated using artificial intelligence that appear deceptively real and are used to spread false information, defame individuals or institutions, or influence public perception. Deepfakes are also used in other phenomenon areas, such as in the creation of abuse depictions of children and young people.

▪ **Filter bubbles and echo chambers**

Filter bubbles and echo chambers are phenomena, primarily driven by algorithms in digital media, where programs select and personalize content based on user data, preferences, and behavior patterns. This leads to users mainly seeing information that confirms and reinforces their existing beliefs, which can result in a distorted perception of reality. However, filter bubbles and echo chambers exist not only in the digital world, but also in the analog world. In real society, these phenomena can

arise through selective information intake or exchanges with like-minded people, which also leads to a distorted perception and reinforcement of existing beliefs.

▪ **Bots, fake accounts, and trolls**

Automated programs (bots), fake user profiles (fake accounts), and real profiles that deliberately leave provocative, offensive, or disruptive comments in order to provoke reactions (trolls) are used in social media to influence discussions, create the impression of broad approval or rejection, or even incite hatred, which can increase societal tensions.

▪ **Clickbait**

Exaggerated or misleading headlines and content are designed to attract users' attention and prompt them to click – often with the goal of generating traffic or spreading false information.

Polarization: A side effect of the strategy and tools combination

Polarization refers to the process by which societal groups drift further and further apart, forming opposing camps. This process can be intensified through the targeted use of strategies such as populism or propaganda and by the spread of tools such as hate speech or disinformation. Polarization leads to growing alienation and blocks dialogue between groups, resulting in a less stable society and weakened democratic institutions.

Legal classification

The tension between freedom of expression and anti-constitutional content is difficult to define clearly. Freedom of expression is protected under Article 5 of the Basic Law (Grundgesetz, GG), but it finds its limits where it violates the rights of others or endangers public safety and order. It is therefore crucial to determine precisely where these boundaries lie and what a precise legal examination should look like.

The limits of freedom of expression

Freedom of expression protects not only the right to express one's own opinions, but also the right to tolerate uncomfortable or unpopular statements – even if they are incorrect, provocative, or inappropriate. This also includes lies, i.e., false factual statements – as long as they do not violate the reputation or rights of others and do not endanger public safety and order. Thus, freedom of expression can also encompass statements that are factually false if they do not have criminal consequences and do not cause concrete harm.

The challenge, however, lies in distinguishing between permissible and impermissible statements. Opinions – personal, subjective assessments or beliefs – and factual claims – statements based on facts that can be verified – may be freely expressed, as long as they do not violate the rights of others or undermine trust in societal institutions. However, this distinction is not always easy to make, especially in the digital space, where information spreads rapidly and consequences can be difficult to assess.

An example illustrates the problem: It is entirely legitimate to express a personal opinion about a restaurant, such as “The pizza there is too salty” – this is a subjective assessment that everyone can perceive differently. The situation is different with the statement “The restaurant uses expired food.” This is a factual claim that is verifiable and objectively true or false. If this statement is false, it can become legally problematic because it could damage the company's reputation, which could fall under defamation or slander.

Social competence as a preventive measure against digital challenges

The ability to distinguish between legitimate statements and those that endanger the rights of others and public safety and order is essential – both for the legal and societal debate on these issues. In the digital age, where disinformation and digital manipulation spread rapidly through phenomena such as fake news, deepfakes, and filter bubbles, it is particularly important that society understands the mechanisms of these phenomena, some of which are also familiar from the “analog world.” Once these complex challenges have been identified and classified, effective strategies can be developed to limit the negative effects of such content and safeguard public discourse.

2. Actionable Complaints: Measures, Successes, and Challenges (In Case Handling)

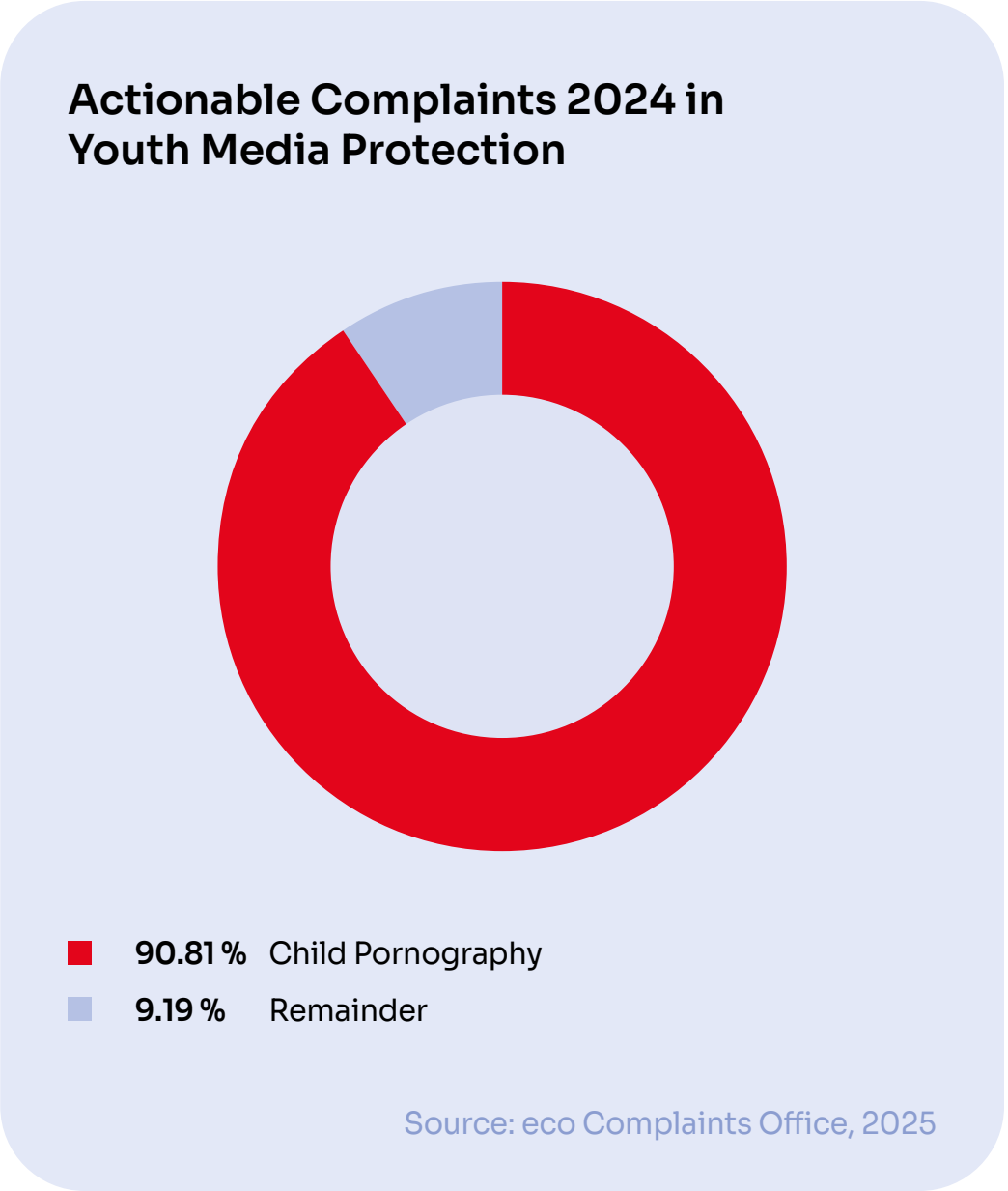
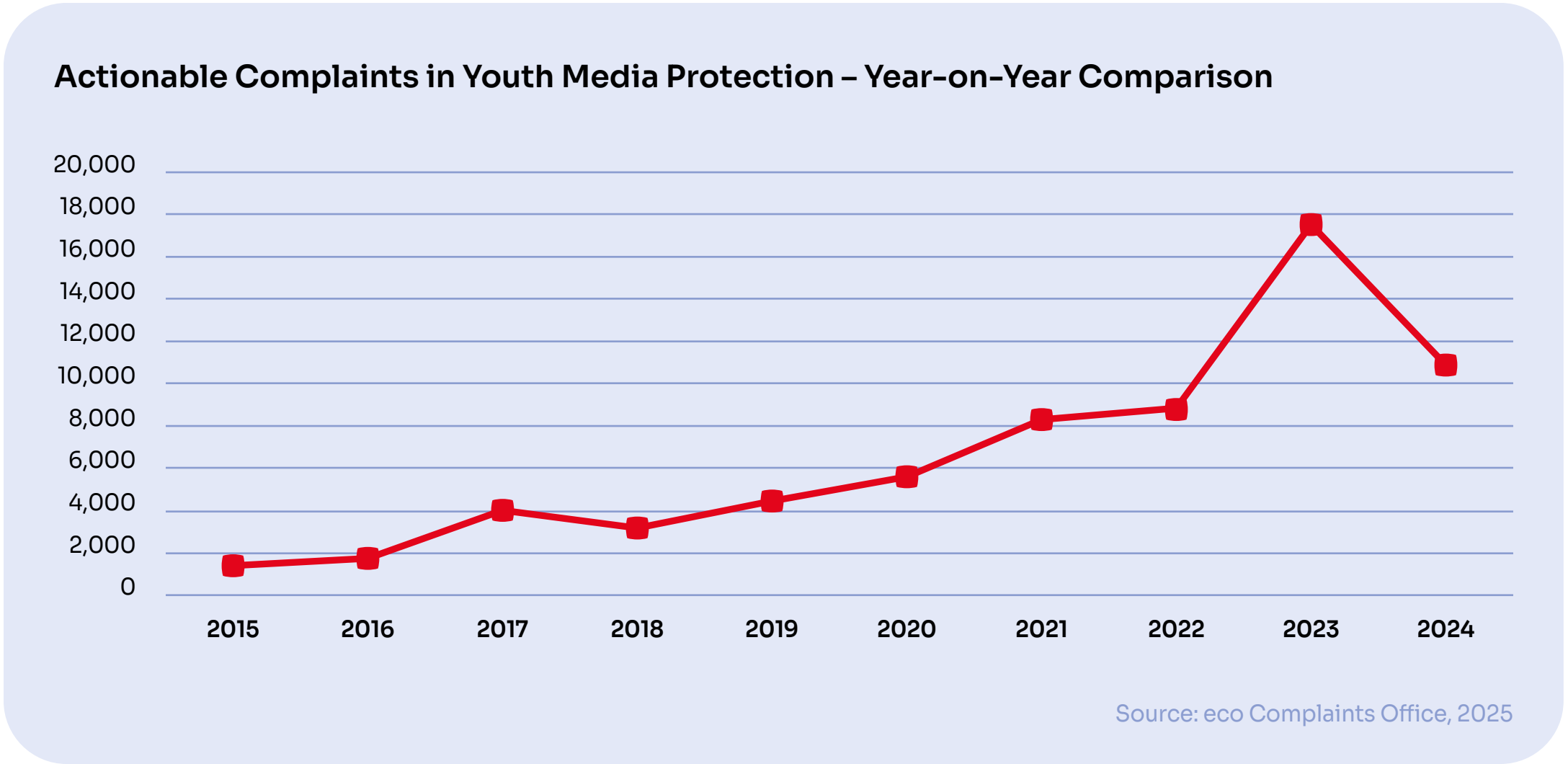
In the reporting year, 10,922 complaints were deemed actionable for the eco Complaints Office (“actionable complaints”). A complaint is considered as actionable if a violation of the law is detected, and measures are subsequently taken to an assessment. As a matter of principle, measures are taken for every violation of the law, unless the eco Complaints Office is reasonably confident that the necessary measures have already been taken (e.g., reports to the police and to the eco Complaints Office in a joint email, knowledge of measures taken by partner hotlines, duplicate reports, etc.).

In retrospect, 2023 can be considered an exceptional year with regard to the number of actionable complaints. In comparison, the number of actionable complaints in the 2024 reporting year is significantly lower, but is still at the familiar level of previous years, comprising slight increases.

As in previous years, a large proportion of the actionable complaints involved content that is accessible via websites of all kinds (web-based content).

In terms of content, Child Pornography content – as in previous years – also accounted for the largest share of actionable complaints: in the 2024 reporting year, this figure was 90.81%. 9.19% of actionable complaints concerned types of other content. This category includes a wide range of

other offenses: various forms of sexualized violence against children and young people (such as youth pornography, cybergrooming, and violations of the most personal sphere of life, i.e., violations under Section 201a of the German Criminal Code (StGB)), anti-constitutional content, depictions of violence, as well as other content that endangers young people and impairs development are summarized in this category. Youth pornography accounts for the largest share of other content.

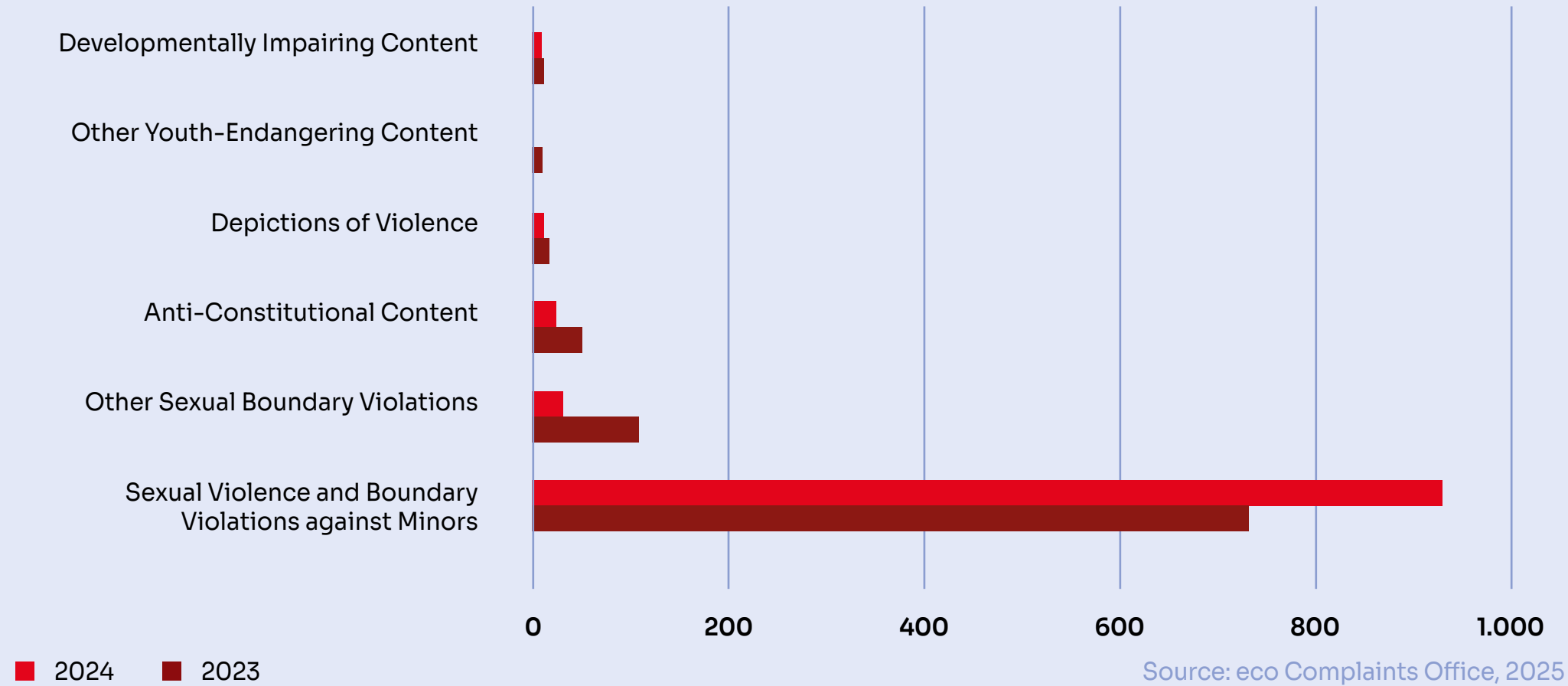


Compared to 2023, the proportion of sexual violence and boundary violations against children and young people (excluding Child Pornography) has continued to rise. In contrast, other sexual boundary violations, such as the distribution of adult pornographic, violent, or animal pornography content under Sections 184 and 184a of the German Criminal Code (StGB), as well as anti-constitutional content and depictions of violence, were slightly less prevalent in the reporting year than in the previous year. Other content that is harmful to young people and impairing development remained comparatively low in both years.

”In the fight against hate and incitement in the digital space, the question is always how far freedom of expression extends. In content that is also accessible to children and young people, the indexing decisions of the Federal Review Board for Media Harmful to Minors can serve as an important point of reference. In the context of constitutional legal proceedings, youth protection and freedom of expression are weighed against each other. Fundamental constitutional values such as human dignity and the principle of democracy are taken into account in this process.”

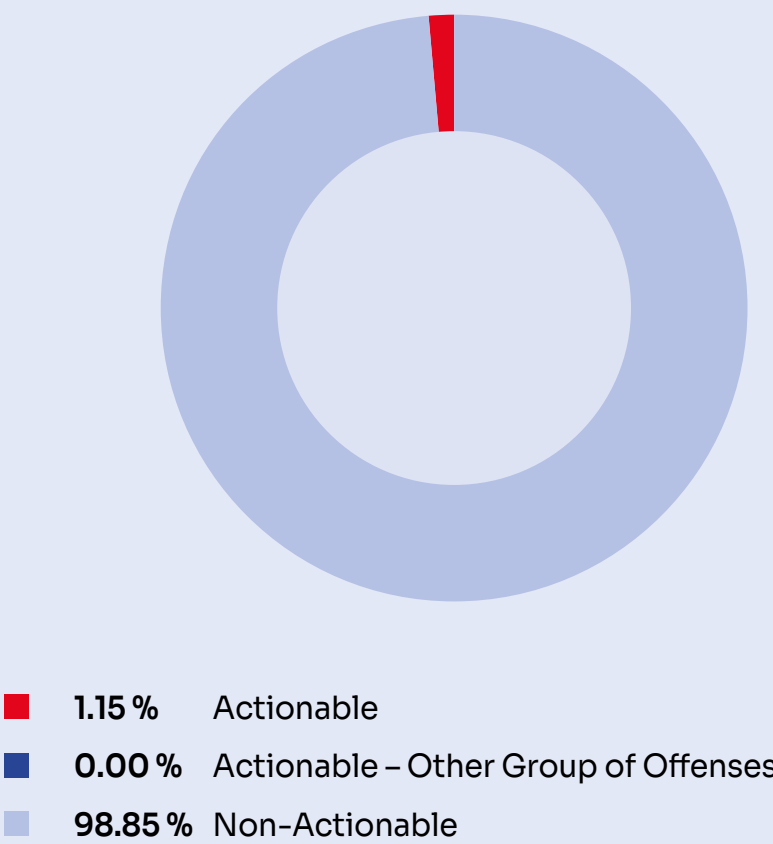
Sebastian Gutknecht
Federal Agency for the Protection of Minors in the Media (BzKJ)

Actionable Complaints in Youth Media Protection (Excluding Child Pornography) in Comparison to 2023

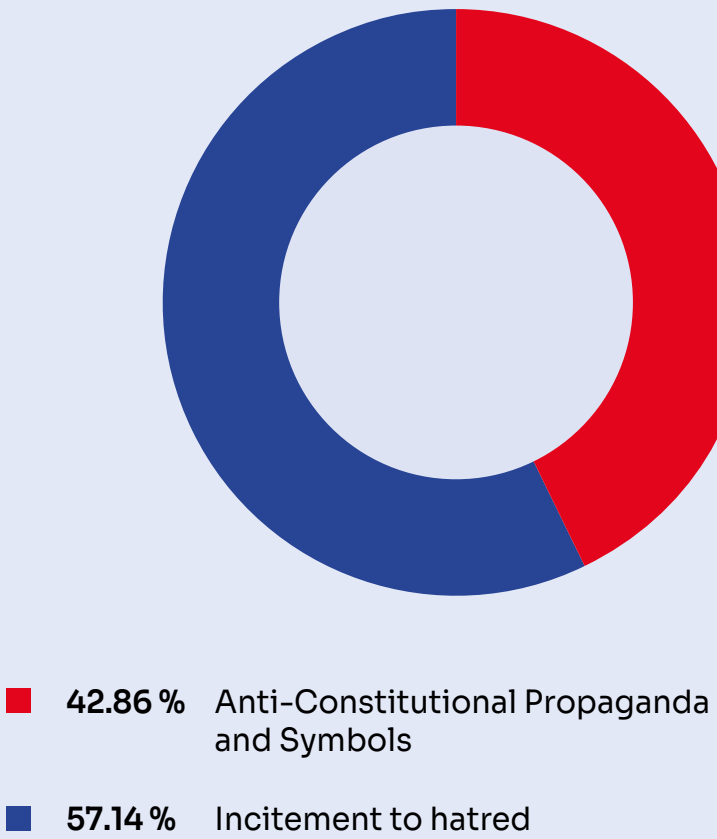


Of the total 1,828 reports regarding suspected anti-constitutional content received by the eco Complaints Office in the reporting year, only 1.15% were legally relevant and thus justified. This suggests that there is increased sensitivity within the population toward inflammatory, hateful, or extreme content or statements, while at the same time the sense of justice often does not align with the legal situation. As a result, many of the reports were based on misinterpretations and were not legally justified.

Percentage of Actionable Complaints About Anti-Constitutional Content



Distribution of Offenses in Actionable Complaints About Anti-Constitutional Content (2024)



More than 57% of actionable complaints about anti-constitutional content concerned incitement to hatred, while 42.86% related to anti-constitutional propaganda and symbols. The reported content was found on platforms and websites.

“Take-down instead of blocking”:
Self-regulation rather than Internet censorship

In the fight against prohibited web content, the take-down of content from the Internet is the core and most worthwhile approach. The method is not only fast, but also effective and long-lasting. This is why the eco Complaints Office has pursued this approach from the very outset.

The Internet industry’s self-regulation mechanisms for the fight against unlawful online content work very well at both the national and international levels. In this regard, in the year under review, approximately 99% of the content reported by the eco Complaints Office was removed – worldwide.

“In addition to our own efforts, we rely on a network of partners whose expertise and experience help us identify non-compliant content and alert us to potentially illegal content. We have had an excellent working relationship with the eco Complaints Office for many years – both within the framework of Google and YouTube’s Priority Flagger Programs and beyond.”

Sabine Frank
Head of Governmental Affairs and Public Policy Google DACH

Measures taken by the eco Complaints Office

After a thorough assessment of the content, action is taken depending on the severity of the offense and the location of the server (in Germany or in other countries):

Punishable Internet content hosted in Germany is always reported to the authorities. In addition, the eco Complaints Office asks that the hosting provider makes the relevant data available to the law enforcement agency on request and takes appropriate measures to prevent further access to the illegal content.

Should absolutely prohibited Internet content be hosted in Germany, the eco Complaints Office now asks the hosting provider to take the content down (disconnect). For other youth-endangering or developmentally impairing content, the provider will be requested to ensure that the content is made legally compliant (for example, through implementation of an age verification system).

Content hosted abroad is initially forwarded to the appropriate INHOPE partner hotline. This hotline then takes over the further processing of the complaint, with the objective of removal or legalization of the content, and also works “locally” with the responsible law enforcement agency of the respective state. If there is no INHOPE member in the country where the server is located, or if the content reported does not fall within the mandate of the INHOPE partner hotline, eco will contact the hosting provider directly.

In addition to this, criminal content hosted abroad is also reported to the authorities if it has a connection to Germany, is punishable internationally, or is subject to universal jurisdiction as foreseen

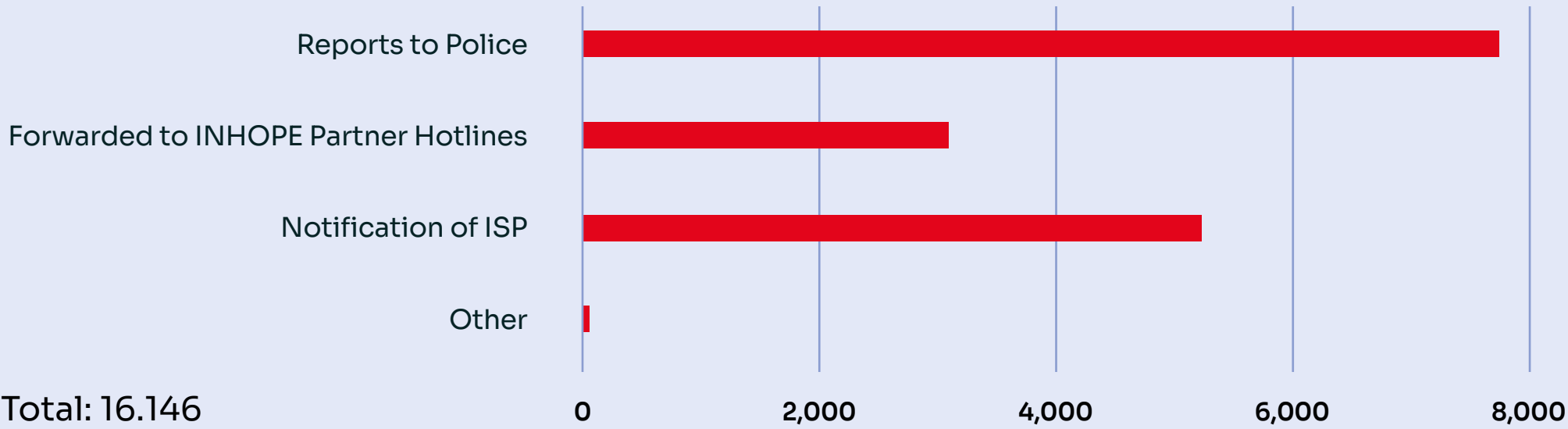
in the German Criminal Code. According to this principle, German criminal law is applicable in certain cases, even if the respective offense has no direct connection to Germany. However, in such cases, the offense must be something directed against internationally protected legal interests; for example, in instances involving Child Pornography content or violations of international law.

On each working day, the eco Complaints Office monitors any continued availability of the reported content. If necessary, the provider will be asked again to remove or legalize the reported content.

Complainants who have provided a return address will be briefly informed of the outcome of the legal assessment.

Last year, the eco Complaints Office sent a total of 16,146 notifications (in particular to the police, INHOPE partner hotlines, and/or ISPs – with this number not including reminders). In this context, the relatively low proportion of reports sent to the police is attributed to the fact that, in cases of depictions of abuse of children on content hosted abroad, a report is generally only made to the German Federal Criminal Police Office (BKA) if no INHOPE partner hotline exists. If, on the other hand, an INHOPE member can be contacted who in turn informs the law enforcement agencies, no report is typically made to the BKA in order to avoid duplication of effort.

Measures Taken by the eco Complaints Office in 2024

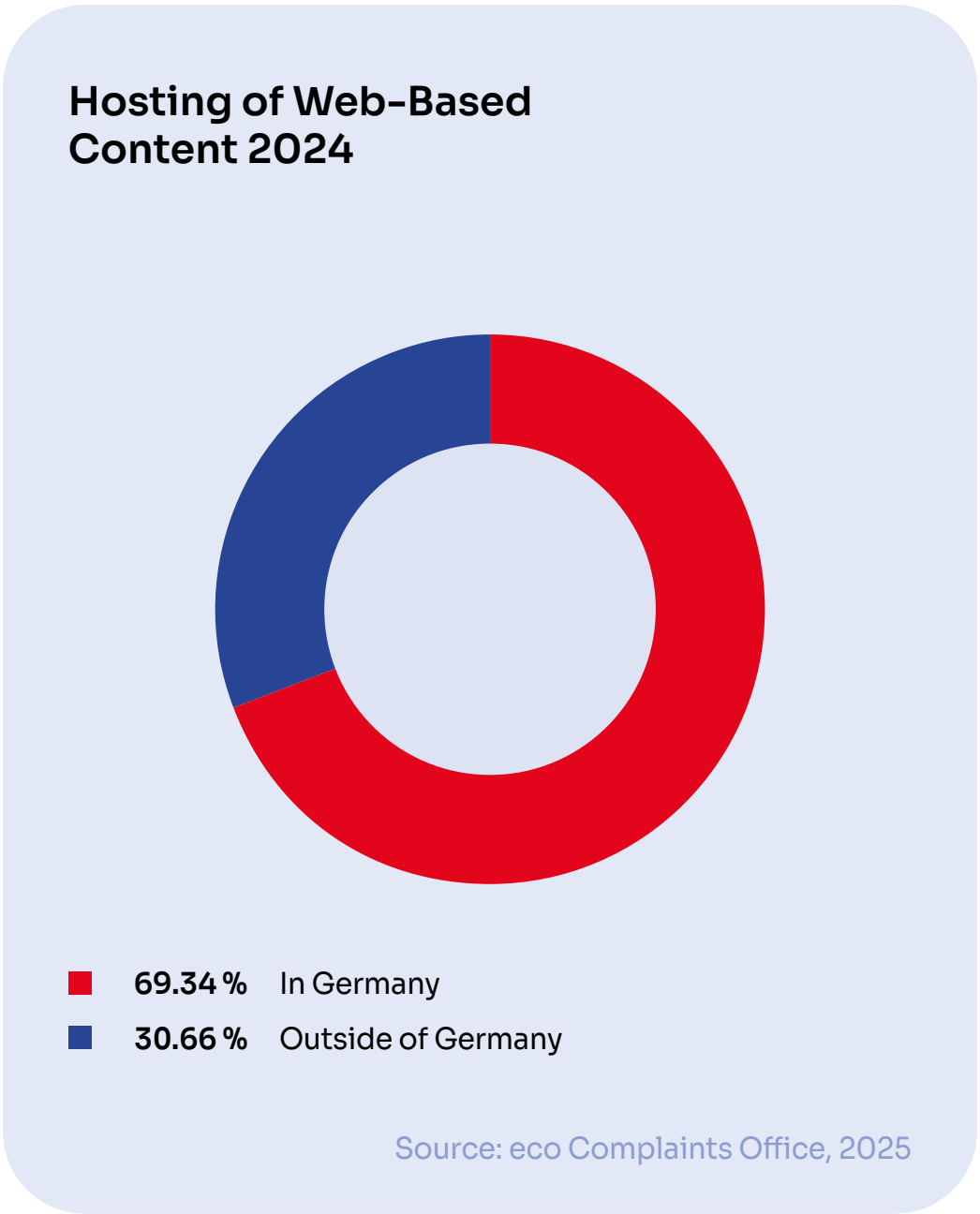
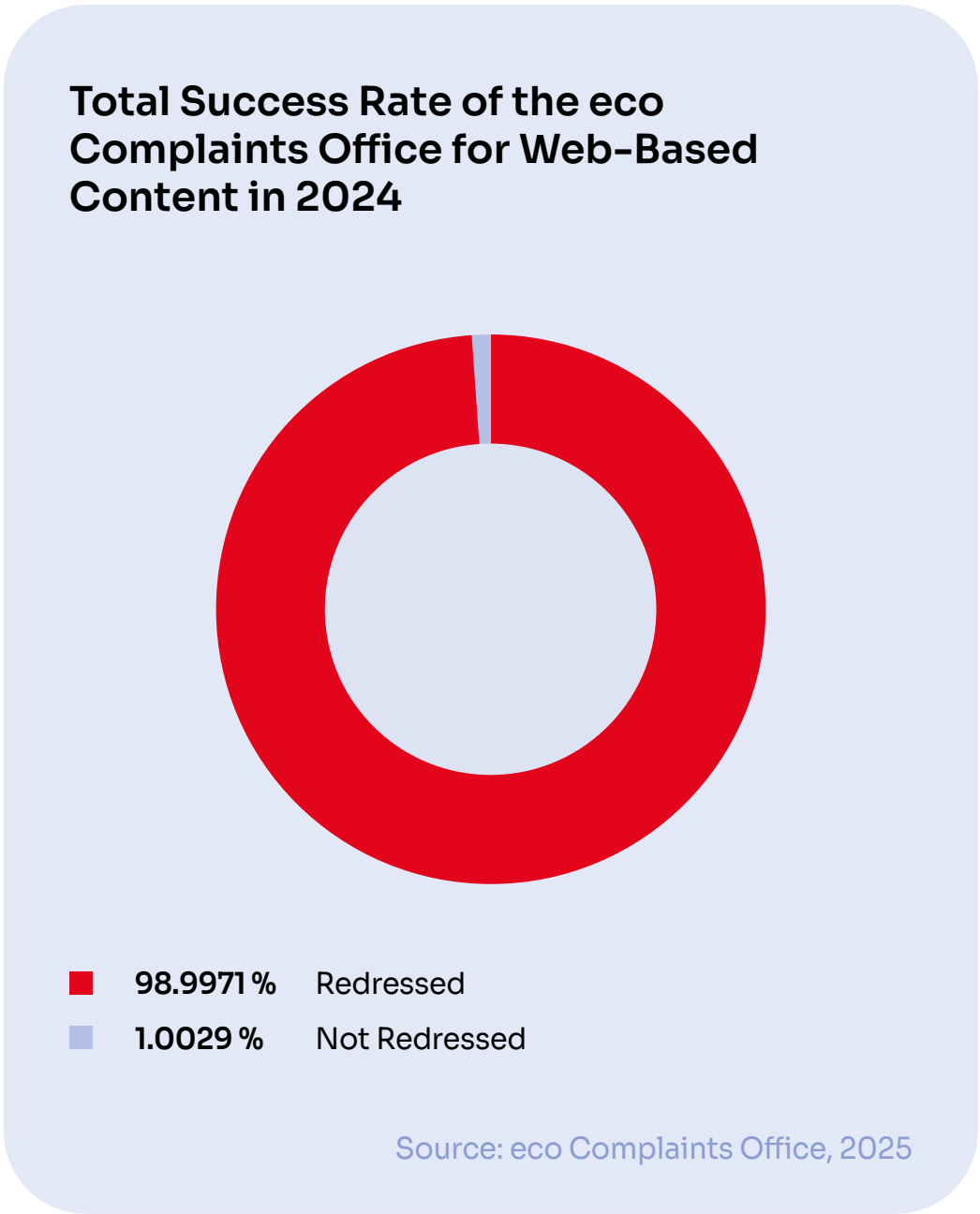


Source: eco Complaints Office, 2025

Success rate for web-based content

Once again, the consistently high success rate for web-based content remained virtually unchanged compared to the previous year: 98.9971% of the content reported was taken down or otherwise legalized (for example, through the implementation of an age verification system). In around 2.19% of these cases, the reported URL was initially moved to another provider (so-called “moved cases”).

This demonstrates that self-regulation works, also internationally. Nearly one-third of the URLs that received complaints (30.66%) were hosted outside Germany.



Challenges in 2024

From a technical viewpoint it is important to emphasize that in 2024 – as in previous years – obfuscation tactics were used in the dissemination of illegal material. The aim of these tactics is to enable only a certain group of people to access the prohibited content, while at the same time making it more difficult for others (such as hotlines, law enforcement officers, etc.) to directly access this prohibited content:

What is not uncommon is that depictions of sexual violence and border violations against minors are only accessible with a so-called referrer. Here, users must come from a specific “source” site, which refers across through a link. The “destination” page tracks where users are coming from and shows different content, depending on the request. A more complex, but comparable, method triggers this technical path-setting through the use of cookies. In this scenario, users can only access the content in question if the specifically defined cookie file recognized by a browser is present on their computer, which may, in turn, have been created by a previously visited page. In both cases, different content is displayed depending on the digital path followed or simulated. Technically, these processes can be simulated using particular tools.

In some cases, access to content for certain user IPs or locations (e.g., entire countries) is blocked from the operator side and/or appears to be unavailable for access from these IPs or locations. In such instances, reported content can only be accessed by using a proxy server or VPN service.

The involvement of Content Delivery Networks (CDNs) also makes it more difficult to process

cases. In such cases, an inquiry must be made at the CDN to identify the host provider, which means an additional step in the processing of the report (both during initial processing and as part of the availability check before a reminder is sent). Fortunately, there is usually a speedy response through the CDN. Occasionally, explanations to the recipient also require a notification that a CDN is involved.

From a legal perspective, in some cases the boundary between the different varieties of offense in relation to Child Pornography as defined in Section 184b of the German Criminal Code posed a challenge, especially with regard to statistical recording. This also applies to the boundary between Child Pornography and other relevant regulations in the area of depictions of sexual violence and border violations against minors. In addition to the often difficult age assessments, one example relates to the distinction between images of children in an unnatural or suggestive sexualized pose and the sexually provocative reproduction of the unclothed genitalia or the naked buttocks of a child.

A further challenge is presented by the different legal situations of countries; in particular, there are international differences in the area of Posing, virtual or text-based Child Pornography, and cases of links to Child Pornography material. The legal assessment of anti-constitutional content is often challenging and complex, as it requires a precise distinction between permissible content and inadmissible statements in order not to unlawfully restrict the right to freedom of expression. If a statement can be interpreted in different ways, this must be taken into account in the legal assessment.

In addition, some elements of an offense, such as “disruption of public peace,” are so-called undefined legal terms, i.e., terms whose interpretation and application require evaluation.

As a general principle, expressions of opinion are permitted as long as they do not violate the rights of third parties or endanger public safety and order. All statements must therefore be interpreted in light of the freedom of expression, especially when it comes to criminal law.

In the case of incitement to hatred (“Volksverhetzung”), for example, this specifically concerns statements that incite hatred or violence against certain groups. The problem in the legal assessment of such statements often lies in distinguishing between provocative but permissible opinions and targeted, inflammatory statements. As such, any assessments must always strike a balance between protecting public order and the preservation of freedom of expression.

When processing complaints about content shared via so-called file hosting services (mostly videos), reviewing this content was also more time-consuming. The design of certain services that make third-party content available can also significantly slow down the review process – for instance, some image-hosting services offer the provision of (all sorts of) content for free of charge, but users must first solve complex Captchas or clear multiple advertising pop-ups before accessing the content.

Furthermore, some content was only accessible with a so-called premium account. The affected platform operators did not always provide us with a corresponding account free of charge.

In 2024, in a few isolated cases, the eco Complaints Office also found that distributors of illegal content transferred their content to another hosting provider, especially after take-down by the original provider. In some cases, they also transferred the content to hosting countries where there is not yet an INHOPE partner hotline. To some extent, this made it more difficult to make contact and submit requests for take-down.

In general, there were only a few host providers from outside of Germany who consistently ignored notifications from us (and other hotlines) and requests for take-down, or who were extremely slow to implement them, regardless of the content.

3. Network & Cooperations

Working together against illegal web content – and for the Good of the Internet: National and international partner(ships)

The effective combatting of illegal Internet content is a task for society as a whole and requires good collaboration between all actors in accordance with their specific options for action. Moreover, the Internet knows no state borders. For hotlines to work effectively, it is therefore also important for them to be well connected worldwide. For this reason, the eco Complaints Office works at both the national and international levels together with a large number of parties, relies on cooperation, and engages in committees and initiatives. In this chapter, we introduce important partners in the fight against illegal Internet content and share an overview of our diverse network activities in 2024.

INHOPE (www.inhope.org)

In November 1999, eco – alongside seven other organizations and with support from the European Commission’s “Action plan on promoting safer use of the Internet” – founded the International Association of Internet Hotlines (INHOPE). For over 25 years, the international network has been successfully working to effectively combat depictions of the abuse of minors.

INHOPE is the international umbrella association of Internet hotlines which operate worldwide and accept complaints about illegal online content, with a particular focus on child sexual abuse material (CSAM). Since its founding, the network has grown to include 55 member hotlines in 51 countries. Complaints concerning illegal Internet content can thus be forwarded to the relevant responsible partner through the cooperation of the hotlines. In this way, the illegal content is investigated in its respective country of origin, which is also advantageous for criminal prosecution. If reported illegal online content is not located on a server in Germany, the eco Complaints Office informs the responsible INHOPE member in the particular case involved.

This cooperation has proven its worth: Through its members, the INHOPE network covers many countries where depictions of the sexual abuse

and sexual exploitation of minors are hosted. The rapid and secure exchange of information across national borders has also led to the breaking up of numerous child sexual abuse rings.

INHOPE itself is not a hotline, but supports the collaboration of the member hotlines in the individual countries. Among other tasks, the umbrella organization sets minimum standards for the processing of complaints and the exchange of reports on the depictions of the sexual abuse and sexual exploitation of minors within the INHOPE network, and offers regular training for the staff of the member hotlines. To ensure compliance with the minimum standards, regular reviews of the member hotlines take place. The eco Complaints Office was successfully reviewed in 2024. In 2024, INHOPE launched its “Ambassador” program, in which eco actively participates through Sebastian Fitting, Consultant at the eco Complaints Office, who acts as an ambassador and is a member of the associated Expert Council. As part of this program, experienced analysts from the network primarily train new colleagues from other hotlines, but also, for example, law enforcement agencies or trust and safety teams from relevant companies in handling the so-called “Universal Classification Schema.” On the one hand, the Schema involves a uniform, descriptive labeling system of reported content

when assessing depictions of sexual abuse and sexual exploitation of minors. On the other hand, through a “translation” of the labels describing the content into legal categories – in view of internationally different legal situations – a (criminal) legal assessment of the content is made possible for each participating country. This is intended, among other things, to help prioritize the handling of reports.

→ Since November 2024, Sebastian Fitting, Consultant at the eco Complaints Office, has been a member of the INHOPE Board.

INHOPE

German Safer Internet Centre (saferinternet.de)

Reporting, advising, raising awareness – these are three important strands for the positive online experience of young Internet users and for combatting illegal Internet content. As such, eco, FSM, jugendschutz.net, Nummer gegen Kummer, and the State Media Authority of Rhineland-Palatinate have been working together as the German Safer Internet Centre since 2008.

Since as far back as 2004, together with the German Association for Voluntary Self-Regulation of Digital Media Service Providers (FSM), eco has been operating the portal internet-beschwerdestelle.de in order to offer users a joint point of contact for reports of illegal Internet content, as well as to provide further information and links to advisors.

As in previous years, joint awareness-raising activities to sensitize the public were also carried out within the consortium.

On Safer Internet Day, a joint expert chat took place on the topic of pornography online. Between 8 a.m. and 6 p.m., around 100 interested parties took the opportunity to ask the participating organizations questions and received insights into legal aspects, media education support, and information on counseling services.

On the occasion of the European Day on the Protection of Children Against Sexual Exploitation and Sexual Abuse on 18 November 2024, the hotlines of eco, FSM, and jugendschutz.net hosted an online event entitled “Together Against Sexualized Violence Online – What Professionals Need to Know.” This webinar had a very large response and reach with more than 400 participants.

In 2024, the German Safer Internet Centre also continued to receive financial support from the European Union in the context of the “Digital Europe Programme.”



“At ‘Nummer gegen Kummer,’ we regularly hear in our counseling sessions how distressing exposure to illegal content on the Internet can be for children and young people. “What can I do?” – for many people seeking advice, it is important to talk about concrete options for action. Referral to the reporting portal ‘internet-beschwerdestelle.de,’ which eco operates together with the FSM, is often the focus here. The cooperation between hotlines and our counseling service is therefore essential in the fight against illegal content and also supports those seeking our advice.”

Anna Zacharias

Managing Director of
Nummer gegen Kummer e.V.

Cooperation with law enforcement agencies

Criminal prosecution is a key element for combatting illegal Internet content. For this reason, in its complaint processing, eco works to ensure that illegal content is taken down and that criminal offenses are reported. The eco Complaints Office also cooperates with law enforcement agencies at both the federal and state levels in undertaking work over and above complaint processing.

In the fight against depictions of the sexual abuse of children, close and effective cooperation with the German Federal Criminal Police Office (BKA) takes place, with this also reflected in the German federal government’s report on the success of deleting Child Pornographic web content. The most recent report, published in July 2024, once again showed that the principle of “take-down instead of blocking” and the collaboration of the hotlines, the BKA, and the German Federal Agency for the Protection of Minors in the Media (BzKJ) present very effective means for combatting illegal Internet content. In addition, the collaboration with the BKA includes regular exchange meetings and a written cooperation agreement between the hotlines (eco, FSM, jugendschutz.net), the BKA, and the BzKJ.

In the area of state security offenses, the eco Complaints Office cooperates with police authorities and public prosecutor offices at both the federal and state levels. Since 2019, eco has also been a member of the North Rhine-Westphalia initiative, “Prosecute, don’t just delete,” and thereby actively supports the rigorous criminal prosecution of hate speech on the Internet. In addition to a regular exchange on hate postings and their legal assessment, the initiative also enables a coordinated and optimized procedure for transferring

criminal charges to the Central Bureau and Contact Office for Cybercrime North Rhine-Westphalia (ZAC NRW) of the Cologne Public Prosecutor’s Office, which specializes in this area. The partners of the initiative also exchanged experiences and developments in the relevant area of crime in 2024, for example within the framework of “digital lunch breaks.”

In addition, the collaborative work between the eco Complaints Office and the police at state level is part of a cooperation agreement between eco, Networker NRW, and the North Rhine-Westphalia Criminal Police Office (LKA NRW).

German Federal Agency for the Protection of Minors in the Media (BzKJ)

The German Federal Agency for the Protection of Minors in the Media (BzKJ) is a key player in ensuring and further developing youth media protection and a long-standing network partner of the eco Complaints Office. BzKJ and the eco Complaints Office work together in partnership in various areas and at different levels. In addition to cooperation within the framework of the German Federal Criminal Police Office (BKA) collaboration, employees of the eco Complaints Office have been appointed as associate members to the Federal Review Board for Media Harmful to Minors for many years and are involved in the BzKJ's indexing decisions. Furthermore, the eco Complaints Office is part of the partner network of the newly established German Office for the Enforcement of Children's Rights in Digital Services (KidD), which was founded in 2024. Although KidD is based at the BzKJ, it operates independently as part of the supervision of the Digital Services Act (DSA).

In the reporting year, representatives of the eco Complaints Office participated in a workshop for cooperation partners of the BzKJ for deepening knowledge, discussion, and legal assessment of borderline cases of "poses and depictions of abuse." They also took part in the BzKJ's "Future Workshop" on the topic of sexual violence and harassment in the digital space. Furthermore, the Head of the eco Complaints Office took part in a panel discussion on the topic of "Challenges of Content Regulation," which was held on 19 September 2024 as part of the symposium "Enforcing Children's Rights in the Digital World – From the Reviewing Body to KidD," marking the anniversary of the BzKJ.

Collaboration on youth media protection with other relevant actors

In 2024, the eco Complaints Office continued its exchange and collaboration with other relevant actors in the field of youth media protection. In this regard, the following activities can be highlighted:

In continuing to build on the work of previous years, the eco Complaints Office extended its collaboration on common and specific topics with the State Media Authority of North Rhine-Westphalia (LfM) and other supervisory bodies. The Complaints Office also cooperated with the LfM as part of the initiative "Prosecute, don't just delete."

For the eco Complaints Office, the Entertainment Software Self-Regulation Body (USK) – due to its many years of experience in the area of youth media protection – is also an important exchange and contact partner in its general scope, both in general matters and in individual cases. Since 2019, Sebastian Fitting, Consultant at the eco Complaints Office, has also been active in assessment committees as youth protection experts for USK.online.

fragFINN e. V., of which eco is also a founding member, has been offering a protected surfing space for children for more than an impressive fifteen years. This is based on a so-called positive list for Internet sites suitable for children. This positive list has been developed by fragFINN and is regularly checked by experienced media pedagogues. In the portal "fragFINN.de," one of the opportunities that children are offered is a search engine which simplifies their access to Internet sites which are designed to be safe for children. Among other forms of assistance, eco supports

fragFINN through participation in its Criteria Working Group. Participation in the working group enables the members of fragFINN to play an active role in shaping the positive list specifications, as well as facilitating a regular information exchange on developments and trends. Here, too, fragFINN benefits from its membership structure, as the various fields of expertise and competencies guarantee a three-dimensional protected space on the Internet, one that can respond immediately to new developments.

In 2024, "priority flagging" was also an essential element of the eco Complaints Office's effective work. The collaborations in this area with special reporting channels for trustworthy whistleblowers enable direct interaction between hotlines and providers, which simultaneously has a positive effect on reaction times.

Since 2022, the eco Complaints Office has also been a member of the City of Cologne's Expert Group on the Prevention of Extremism. The eco Complaints Office also actively supported this expert group in the year under review and took part in its annual network meeting. The partnership and collaboration at the local level also led to a recurring event in 2024 as part of the "Cologne Prevention Talks" series at the Cologne Adult Education Center. Within this framework, the eco Complaints Office, together with the Cologne Police, informed parents, educators, and other interested parties about online risks, the legal framework for evaluating online content, and possible courses of action.

"We at fragFINN e.V. greatly value the close partnership with our founding member, eco – Association of the Internet Industry. Together with our members, we promote participation, protection, and empowerment of children and young people in the digital space, providing them a safe, positive entry into the digital world. In addition, we offer valuable guidance for families and educators. In this way, we are creating a safe and inspiring digital world for all children – a place where they can learn, play, and grow without worry."

Nadine Berneis
Managing Director, fragFINN e.V.

Special cooperation via the eco Complaints Office's partnership model

For the eco Complaints Office, collaboration with the association's companies and other partners is essential. This applies to combatting illegal Internet content in processing the reports, as well as the further activities of the Complaints Office. Each actor has specific options for action, interests or responsibilities. Together, they can act effectively and achieve a great deal. In other words: "Together for the Good of the Internet!" In order to be able to strengthen or further develop activities and to simultaneously provide additional support to members of the association and other companies or organizations in their various activities and interests, the eco Complaints Office has therefore developed the "For the Good of the Internet" partnership model. Supported by Meta, efforts to combat illegal Internet content were promoted in the year under review. Multipliers and Internet users were made aware of risks and possible responses, and the important exchange with political actors was continued jointly in a variety of ways.

→ You can find further information at:
<https://international.eco.de/topics/policy-law/eco-complaints-office/partnership-with-the-eco-complaints-office/>

Imparting media skills

Media education is a major challenge and responsibility. The adults responsible for this often come up against their own limits. Due to the fast-moving pace of the social networks and messenger services, knowing how to use and handle these is not always easy, especially for children and young people. This is why the Complaints Office makes itself available for both parents' evenings and teacher training courses, in order to raise awareness among people of legal risks and thus promote the positive use of all online services. In addition, the eco Complaints Office offers its own digital event formats.

In the year under review, the State Prevention Unit Against Violence and Cyber Violence for Schools in North Rhine-Westphalia was an important cooperation partner of the eco Complaints Office. In close collaboration with the State Prevention Unit and the Cologne Police, the eco Complaints Office conducted a webinar expert discussion on the occasion of Safer Internet Day 2024 under the SID motto "Let's Talk About Porn," addressing, among other things, legal aspects of legal and illegal areas of pornography. Additionally, Bianca Gründer, Consultant at the eco Complaints Office, participated in the annual network meeting "Violence Prevention in North Rhine-Westphalia" organized by the State Prevention Office.

Since December 2018, the eco Complaints Office has also been a network partner of the "s.i.n.us" project, "Safely Underway with the Internet." This is an association of institutions in the Rhine District of Neuss involving schools, parents, police, youth welfare, and addiction support services. The

aim of the joint project is to promote the media skills of pupils, teachers, and parents – for example, on the basis of further training opportunities. In this context, the eco Complaints Office was able to contribute its expertise to the specialist conference "Healthy Balance in the Digital World" organized by the Rhine-Neuss District, together with the local police, where it provided educational professionals with insights into criminal law aspects, youth protection, and cybercrime in the online world.

"Media education and digital skills are key components of modern education. Children and young people must learn to use digital media critically, creatively, and safely. With the eco Complaints Office as a committed partner, we succeed in strengthening teachers, parents, and students in a sustainable way through numerous events and close cooperation."

Vera Nather
 Head of the s.i.n.us Network

Online Youth Protection for Companies

Extra benefits for member companies: Youth protection has always been an important part of the eco Complaints Office's assessment standard. The eco Complaints Office was

established on the initiative of our member companies in 1996 and can now look back on almost 30 years of expertise in this field.

▪ Legal Expertise

The Complaints Office offers a considerable alleviation to the day-to-day work of member companies of the eco Association; for example, through initial legal assessments of reports concerning illegal content. This allows complaints that are non-actionable to be filtered out so that providers do not have to deal with them.

▪ Close to politics

As part of the Policy, Law & Regulations division, the eco Complaints Office accompanies and monitors political issues and legislative processes at national and international levels and actively brings its expertise and many years of experience to bear on these processes. The eco Complaints Office works in close proximity to world politics, monitors processes, and immediately recognizes and reacts to new developments in the field of youth media protection.

▪ Network of experts and committee work

The eco Complaints Office represents an important voice on the subject of youth protection in all of its facets: Years of successful collaboration with law enforcement agencies, providers, partner hotlines, and actors in the field of youth media protection, not to mention the active support of national and international committees and initiatives, has made the eco Complaints Office the ideal mediator between the industry and state bodies.

▪ Lasting offers for eco Association members

In addition to the full legal qualifications of our staff, who assess online content and any measures to be taken, member companies profit for almost 30 years of expertise in the field of youth media protection. A contribution is made by separate services of the eco Complaints Office, which are offered independently of the general complaint work service.

Youth Media Protection Expert Lunch

With the "Youth Media Protection Expert Lunch," the eco Complaints Office offers an open forum targeted exclusively at association members active and interested in the field of youth media protection, with the aims of exchanging experiences and gathering information. Two to three planned meetings are held per year, with additional relevant parties and external experts sometimes also invited to contribute. In addition, teleconferences and online meetings will be offered on specific occasions if information or coordination is required in the short-term. The following are the focal topics of our Youth Media Protection Expert Lunch:

- The application of the German Interstate Treaty on the Protection of Minors in the Media (JMStV) and the corresponding regulations in the German Criminal Code (StGB);
- Legal developments in youth media protection in its broadest sense;
- "Digital trends"; and
- The activities of the eco Complaints Office.



→ If you are interested in availing of or finding out more about this service, we'd be happy to hear from you at the following email address: jugendschutzbeauftragte@eco.de

eco Youth Protection Officer Service

The Youth Protection Officers have the following functions:

- Advisory service for the provider
- Contact person for users
- Point of contact for official oversight

Youth protection on the Internet is a task for society as a whole. With the eco Youth Protection Officer Service, association members in particular have the opportunity to make their contribution to this cause. Certain telemedia providers with content that is developmentally impairing or youth-endangering, as well as providers of search engines, may also be obliged to appoint a Youth Protection Officer in accordance with Section 7 of the German Interstate Treaty on the Protection of Minors in the Media (JMStV).

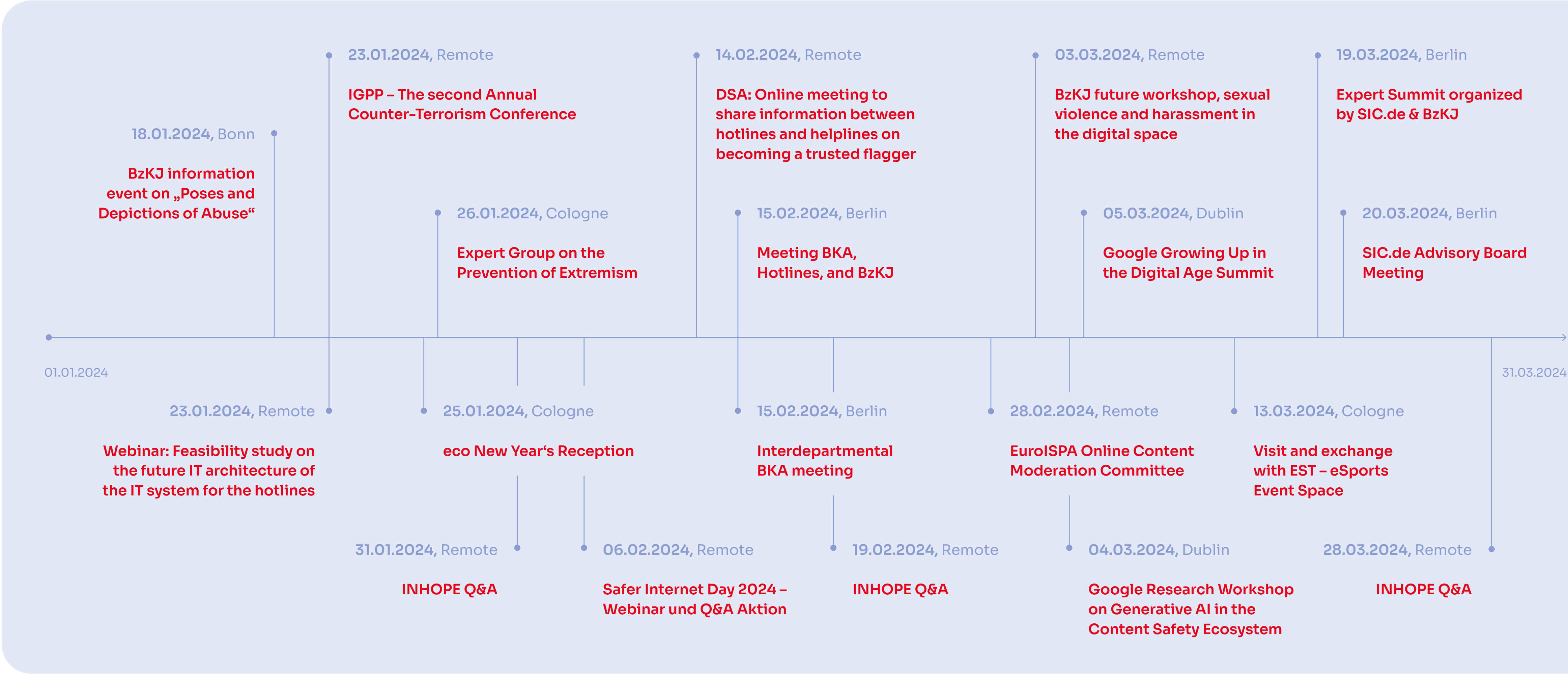
With the eco Youth Protection Officer Service, the Complaints Office provides comprehensive support to telemedia providers in fulfilling this obligation or in the voluntary appointment of a Youth Protection Officer. It offers the following functions and benefits:

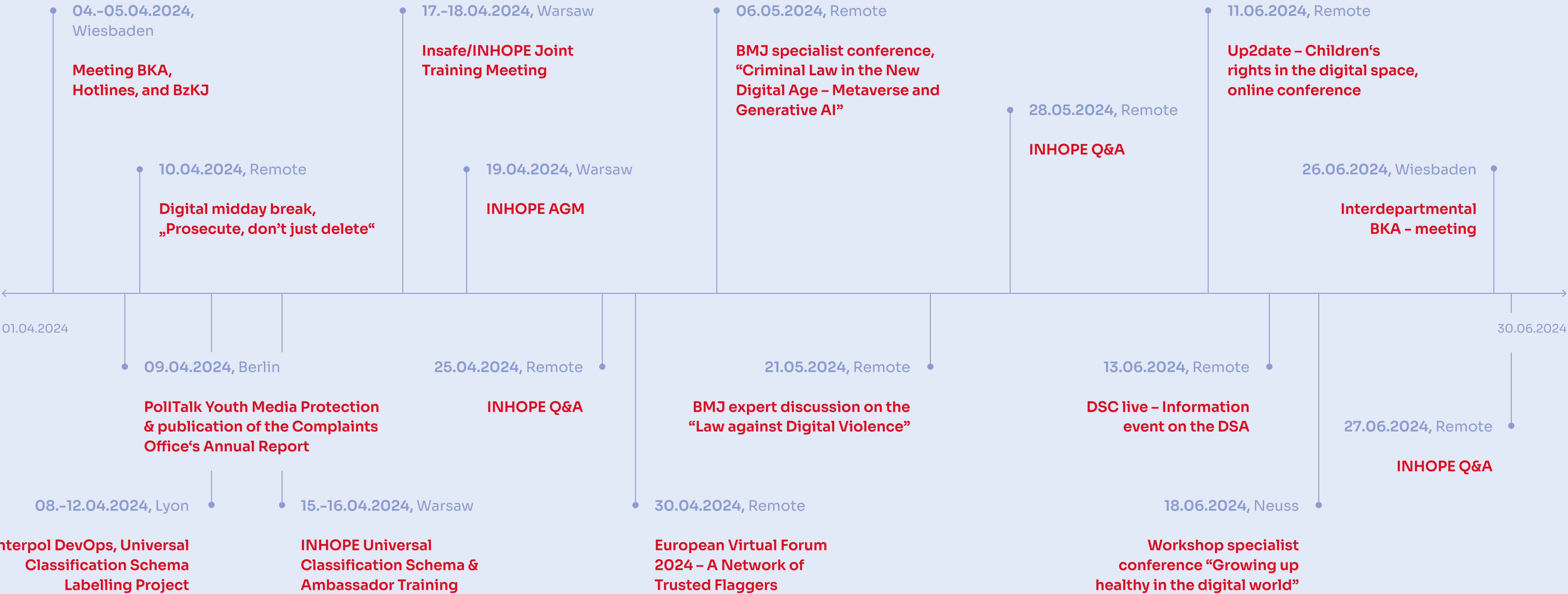
- Comprehensive consultation on matters relating to youth protection
- A neutral point of contact between telemedia providers and their users
- The minimization of liability risk
- Prevention of official fines and written warnings
- An increase in user trust through effective youth protection
- Current information and updates on developments, and legal changes in the area of youth media protection
- A service tailored to the type of provider
- A seal of quality/logo for websites

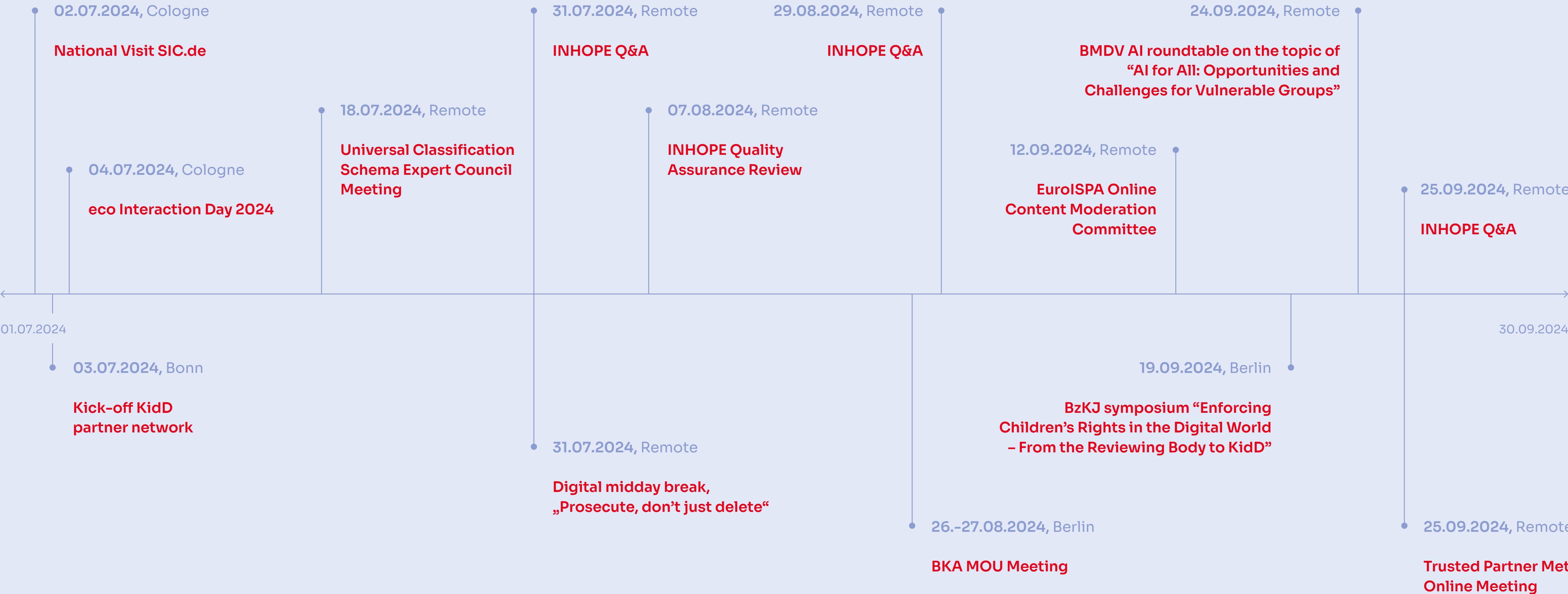
4. Insights into Network and Committee Work, Events, Politics, and Media Response

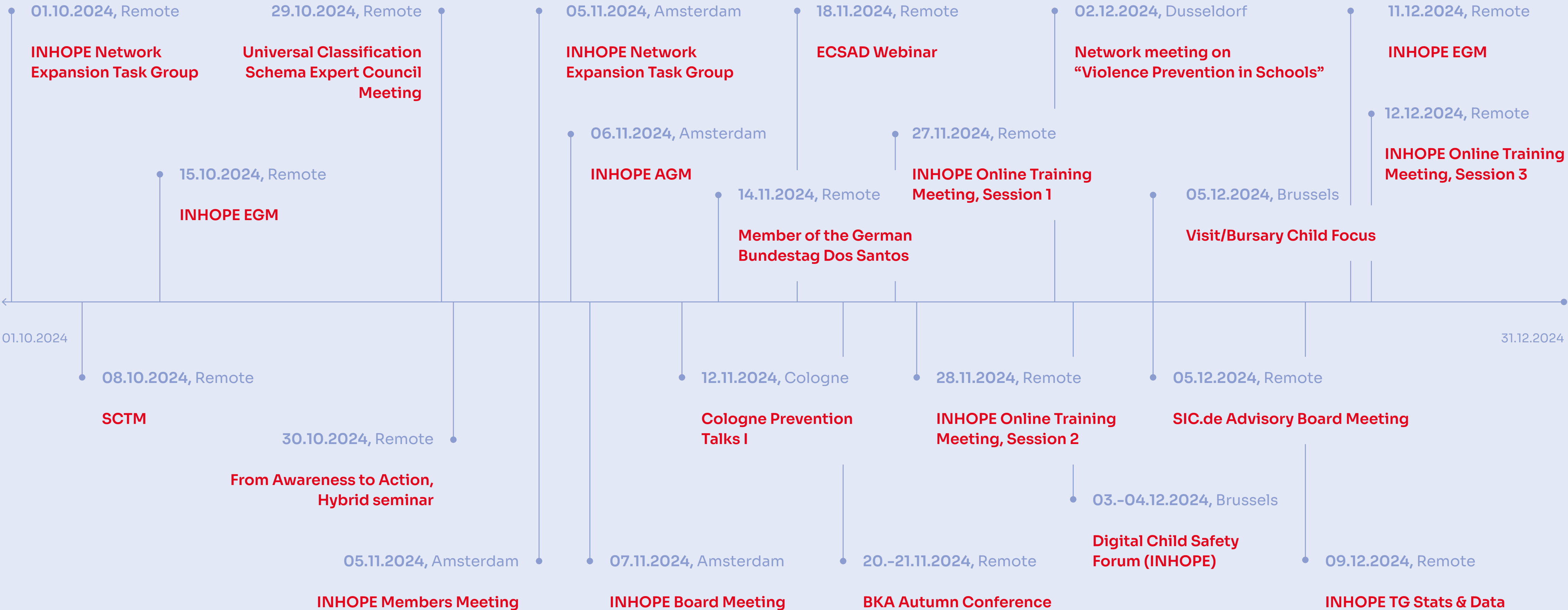
In 2024, the eco Complaints Office continued its active involvement in numerous events, activities, and committees at both national and international levels in order to advocate for efficient measures

and procedures in combatting illegal Internet content, as well as for effective and practical youth media protection. The following chapter provides an excerpt of these activities.









Google Research Workshop on Generative AI in the Content Safety Ecosystem

04.03.2024, Dublin

In preparation for the summit on the following day, Google invited experts from various fields – including Sebastian Fitting, Consultant at the eco Complaints Office – to a workshop on generative AI tools. The participating organizations contributed their experience with cases involving this technology – which is still relatively new and widely accessible – and discussed and outlined phenomena relating to both the use of such tools and their results. All participants collaborated on developing a set of principles and ideas for the safest possible use of such services – and particularly for minors.

Google Growing Up in the Digital Age Summit

05.03.2024, Dublin

On 5 March 2024, Sebastian Fitting, Consultant at the eco Complaints Office, participated in Google’s “Growing Up in the Digital Age Summit.” The summit featured a combination of panel discussions, interactive formats, and presentations by and with experts from the network and the field of youth media protection. In addition to companies, NGOs, associations, and public authorities were also represented. Participants – including young people – addressed questions around how adolescents can engage with online platforms in a safe and trustworthy way, such as how to balance access and safety in the use of generative AI tools.

Expert Summit “NextGen Media – Digital Trends in the Focus of Child and Youth Media Protection”

19.03.2024, Berlin

The eco Complaints Office participated as a co-organizer in the Expert Summit “NextGen Media – Digital Trends in the Focus of Child and Youth Media Protection,” hosted by the German Federal Agency for the Protection of Minors in the Media (BzKJ) and the members of the German Safer Internet Centre. Among other contributions, eco co-led a workshop together with FSM and jugendschutz.net, entitled „From Dial-up to Deepfake: How Harmful Online Content for Young People Is Changing Over Time?“ and exchanged ideas with the attending experts.

Digital Child Safety Forum

03.-04.12.2024, Brussels

As part of INHOPE’s EU-funded CPORT project, various representatives from law enforcement and other authorities, NGOs, hotlines, and the industry gathered in Brussels at the invitation of the Belgian Federal Police and INTERPOL to discuss joint approaches to combatting child sexual abuse material. In addition to networking exchanges, the focus was on expert presentations. Topics included proactive strategies for preventing digital sexual exploitation, including in connection with human trafficking, differences, and similarities in national approaches, and the need for coordinated, cross-sectoral measures. The practical experience of all participants on-site led to a fruitful and solution-oriented exchange.

EuroISPA: Content Moderation Committee

28.02.2024, 12.09.2024

In participating in virtual meetings organized by EuroISPA on the topic of content moderation, the eco Complaints Office – represented by Head of the Complaints Office Alexandra Koch-Skiba – actively engaged in monitoring political and regulatory developments relating to combatting prohibited Internet content and content harmful to young people at the European level. Plans by the European Commission for a new legal framework in the field of CSAM also formed a significant focus in 2023. In addition, the eco Complaints Office shared its own experiences in combatting this content with EuroISPA members and provided information on regulatory developments and perspectives in Germany.

PollTalk on “Challenges in Youth Media Protection”

09.04.2024

On 9 April 2024, the eco Complaints Office hosted a PollTalk on the topic “Challenges in Youth Media Protection.” Following a keynote speech by Member of the German Bundestag Tabea Rößner and a brief presentation of the eco Complaints Office’s 2023 annual report, the Head of the eco Complaints Office, Alexandra Koch-Skiba, discussed current issues with Oliver Süme (eco Chair or the Board and Attorney-at-Law), Sabine Frank (Head of Governmental Affairs and Public Policy YouTube DACH/CEE/EEM), and Sebastian Gutknecht (Director of the Federal Center of Protection of Minors in the Media). This related to legislation on youth media protection, the interaction between self-regulation and official supervision, and the role of trusted flaggers. The discussion also examined the challenges and opportunities that the DSA and the new Digital Services Act bring for media supervision and the coexistence and cooperation of the various players.

CSAM Regulation

From a regulatory point of view, in 2024 the European Commission’s proposal for a “Regulation on laying down rules to prevent and combat child sexual abuse” (CSAM Regulation) was once again the eco Complaints Office’s primary topic. In addition to new obligations for providers – especially hosting providers or providers of interpersonal communication services – the regulation proposes the foundation and establishment of so-called competent or coordination authorities in the Member States, as well as a so-called “EU Centre.” The establishment of new, specific bodies could have an impact on the work and the network of the established hotlines. Due to the impact on the member companies and established hotlines, this European planned legislation is therefore of particular importance for eco as an actor and as a hotline operator.

The political discourse on how to handle the proposed regulation took place primarily at the European Council level during the reporting year. This discourse was accompanied by a variety of PR activities and the co-signing of several so-called “joint letters.”

Furthermore, on 23 January 2024, the eco Complaints Office participated in a webinar that was conducted in connection with a study commissioned by the European Commission (Feasibility study on the future IT architecture of the IT system for the hotlines). The webinar focused primarily on how the complaint handling processes established by the hotlines and the reporting tools used can be aligned with the IT systems of a potential future EU center.

CSAM Directive

On 6 February 2024, the European Commission published its proposal for revising the CSAM Directive (Directive on combating the sexual abuse and sexual exploitation of children and child sexual abuse material and replacing Council Framework Decision 2004/68/JHA (recast)) and launched it for consultation. This directive includes, among other aspects, requirements for Member States regarding the criminalization of depictions of sexual abuse and sexual exploitation of children and young people and obligates Member States to implement effective notice and take-down measures. The revision of the CSAM Directive aims, on the one hand, to tighten substantive (criminal) law in the Member States in these areas and, on the other hand, to introduce explicit provisions regarding the role of hotlines.

The eco Complaints Office accompanied the political discourse surrounding the revision of the CSAM Directive in 2024 and took a position within the framework of the EU consultation.

Plans for a law against digital violence

During the reporting year, the German Federal Ministry of Justice (BMJ) also continued to pursue its plans to develop a law against digital violence. In this context, it held an expert discussion on the “Law against Digital Violence” on 21 May 2024, in which the regulatory topics of information rights for affected parties, account blocking, and authorized representatives were discussed. Represented by the Head of the Complaints Office, the eco Complaints Office participated in the expert discussion. In addition, on 9 December 2024, the BMJ published a draft discussion paper for a law against digital violence and provided an opportunity for comments.

Public relations and media response

In 2024, the eco Complaints Office continued its successful public relations work and developed it further in a strategic manner. The topics, working methods, and political positions of the eco Complaints Office were effectively communicated through a wide range of channels – both to the general public and within the political sphere.

In addition to established communication opportunities such as the publication of the annual report, active participation in Safer Internet Day (6 February 2024) as well as the European Day for the Protection of Children Against Sexual Exploitation and Sexual Abuse (18 November 2024), the ongoing debates surrounding the EU “Regulation on laying down rules to prevent and combat child sexual abuse” (CSAM Regulation) were particularly central to public relations work during the reporting year.

In total, the eco Complaints Office published nine press releases in 2024 on current topics, two political statements, one thematic podcast, as well

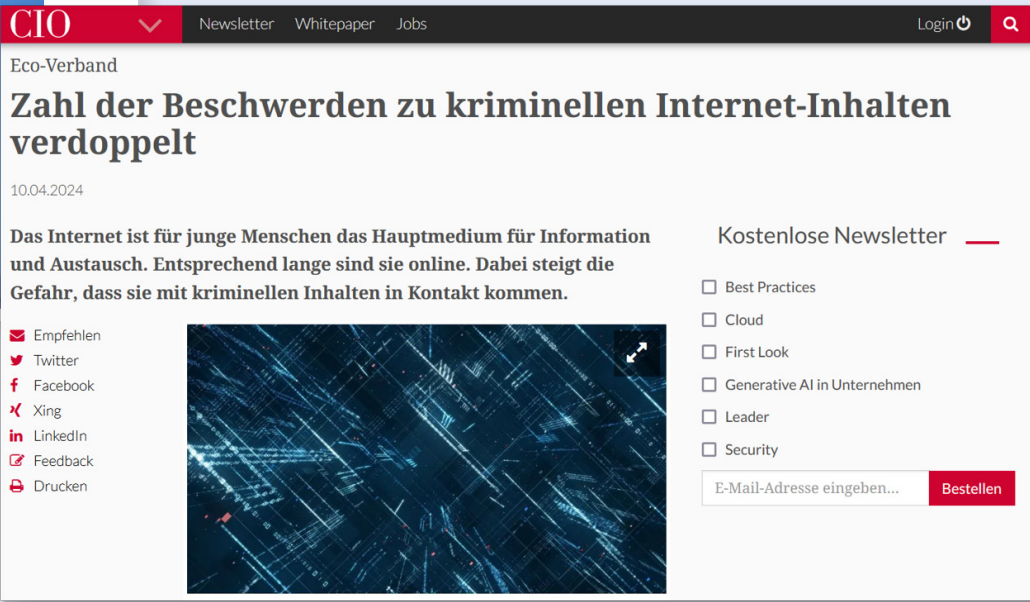
as articles in the annual report and the Safer Tech Newsletter (STN). The survey on vacation-related posts, published in August, attracted particularly strong media attention: it made it clear that one-third of the population does not take precautions when sharing photos of children – a finding that was picked up by several media outlets, including two reports by the German Press Agency (dpa).

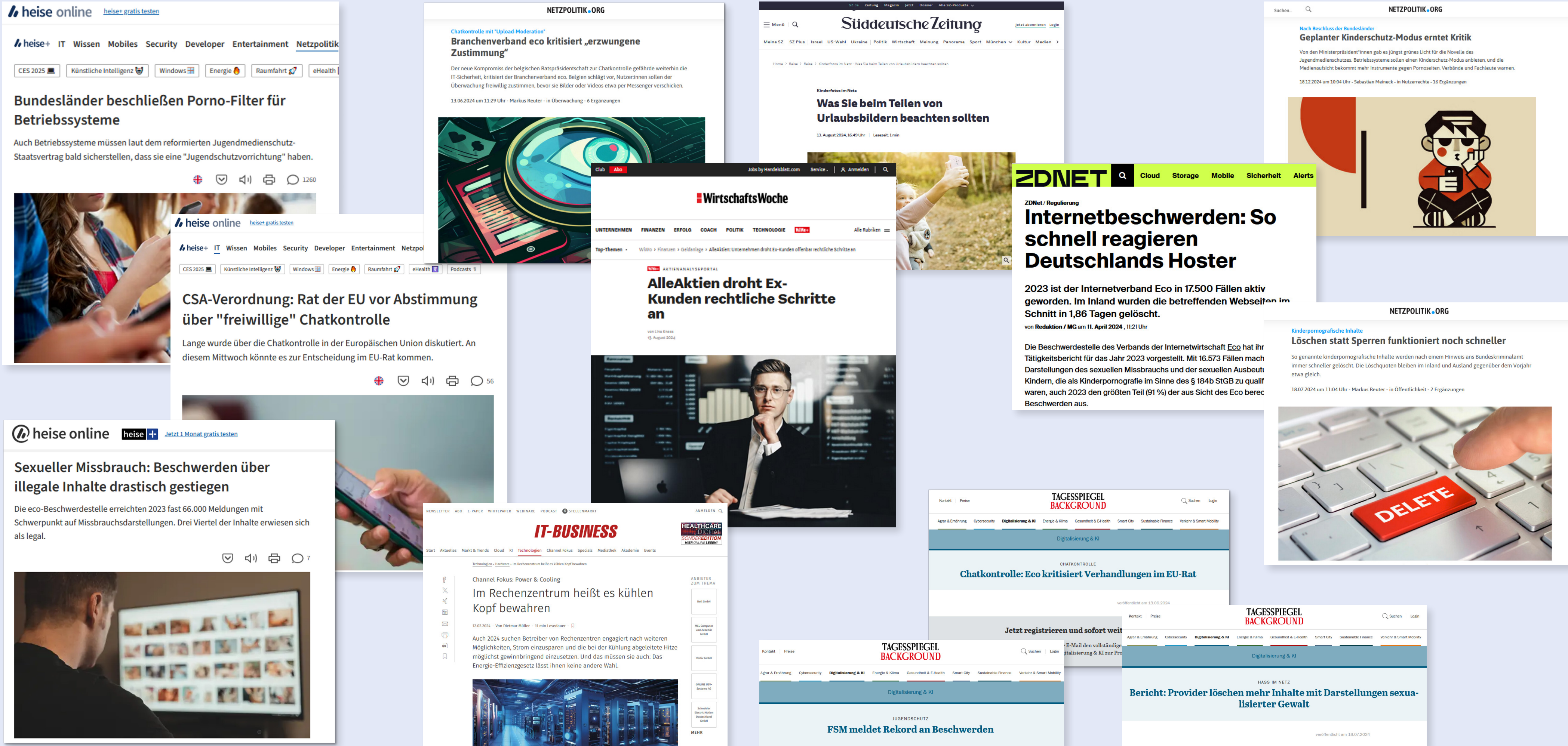
In terms of content, the focus was on topics such as legal criticism of the CSAM Regulation, measures for youth media protection, media literacy promotion, and the role of hotlines in the effective take-down of illegal content.

The media presence of the eco Complaints Office remained at a consistently high level in 2024: a total of 612 reports were recorded in print, online, TV, and radio media. Together with the response to the international INHOPE network and the IBSDE portal operated jointly with FSM, this resulted in a total value of 738 clippings.

Selected media reports

The following clippings provide an exemplary insight into the media coverage of the eco Complaints Office’s work in 2024. They reflect the thematic spectrum as well as the reach across both regional and national media – from specialist publications to major daily newspapers and news agencies.





Conclusion & Outlook

In the reporting year 2024, the eco Complaints Office drew an overall successful balance. Thanks to close cooperation with international partners and authorities, around 99% of the reported content was successfully removed or led to its legal reclassification. The continuing high volume of complaints in the area of sexualized violence against children and young people particularly underscores the urgency and importance of the work carried out by the eco Complaints Office.

These successes not only illustrate the need to identify and remove harmful content, but also the critical importance of promoting a safe and respectful digital environment – an important step in preventing abuse and upholding fundamental values such as safety and protection for all, especially in relation to technical obfuscation tactics and emerging phenomena such as deepfakes.

The high volume of complaints concerning anti-constitutional content also reflects growing societal awareness of harmful and illegal content in the digital space, demonstrating an increased consciousness of the dangers that certain online

expressions pose to society. Many are concerned about the state of democracy. At the same time, the line between permissible and criminal content and statements remains a challenge.

A vibrant democracy needs well-informed, engaged citizens who are able to deal critically with information and actively participate in society. Media literacy, civic education, and targeted efforts to combat disinformation through awareness-raising are essential building blocks for strengthening democracy in the long term.

A central aspect therefore remains the promotion of media literacy, particularly among children and young people. It is essential to raise awareness among young people at an early age and in a sustainable manner about the importance of critically engaging with digital content, teaching them to question information and enabling them to move safely and responsibly in digital space. At the same time, adults must also be educated in these areas so that they can pass on their knowledge and experience to children and young people, thereby promoting the safe use of digital content.

This contributes, for example, to the prevention of fake news, hate speech, and (sexualized) violence, and raises awareness of democratic processes.

Only through joint efforts by educational institutions, politicians, civil society, and IT companies can a resilient, enlightened, and pluralistic society be ensured. Through collaboration, a safe, democratic digital space can be created that strengthens the values of protection, education, freedom of expression, and social participation.

Looking ahead, a two-pronged approach will be essential. On the one hand, media literacy must be strengthened. On the other hand, self-regulation systems must be reinforced for the effective removal of illegal Internet content.

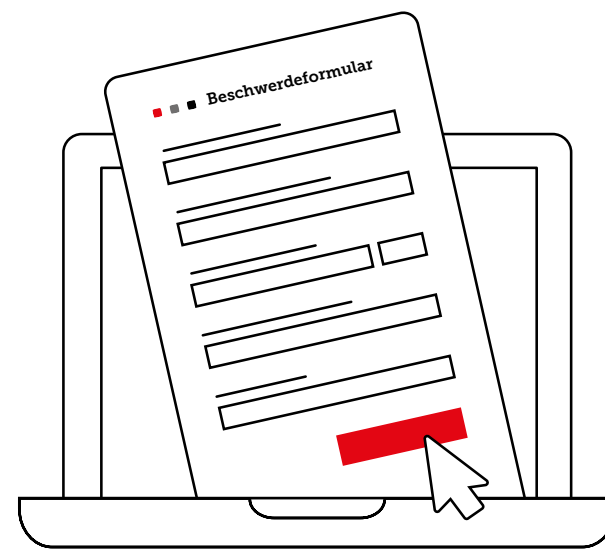
The eco Complaints Office will continue to play a key role in the fight against illegal Internet content, further intensify its cooperation with international partners and relevant actors, and provide legal educational work in the field of digital and civic education (for adults and professionals).

What can you do?

Every report counts in the fight against illegal content! If you come across content online that you believe is illegal, don't hesitate: Report it to the eco Complaints Office – simply and anonymously at:



complaints-office.eco.de



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Publisher

eco – Association of the Internet Industry
Lichtstrasse 43 h, 50825 Cologne, Germany

Phone +49 (0) 221 / 700 048-0
Fax +49 (0) 221 / 700 048-111

info@eco.de
international.eco.de

Managing Directors: Alexander Rabe, Andreas Weiss
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