11 September 2025

# Chat Control Cyprus Briefing

Internet Society

Global Encryption Coalition

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# Policy tensions with encryption

- Law enforcement wants access to devices and online platforms (encryption as a barrier)
- National Security wants protection from cyber attacks and espionage (encryption benefits)
- Consumers want control – protection  from hacking and attack (encryption benefits)
- Companies will always want to sell products that consumers want (encryption benefits)

# EU Child Sexual Abuse Regulation

- 2022 Proposal
- Good intention:
  - Reduce circulation of child sexual abuse material (CS
- Flawed approach:
  - Detection orders: providers must be able to identify, detect, and hand over evidence of CSAM
  - No exception for encrypted messaging
  - Result: providers pressured to either remove encryption or undermine encryption
  - Client-side scanning (upload moderation) pointed to as solution

# Client-side Scanning

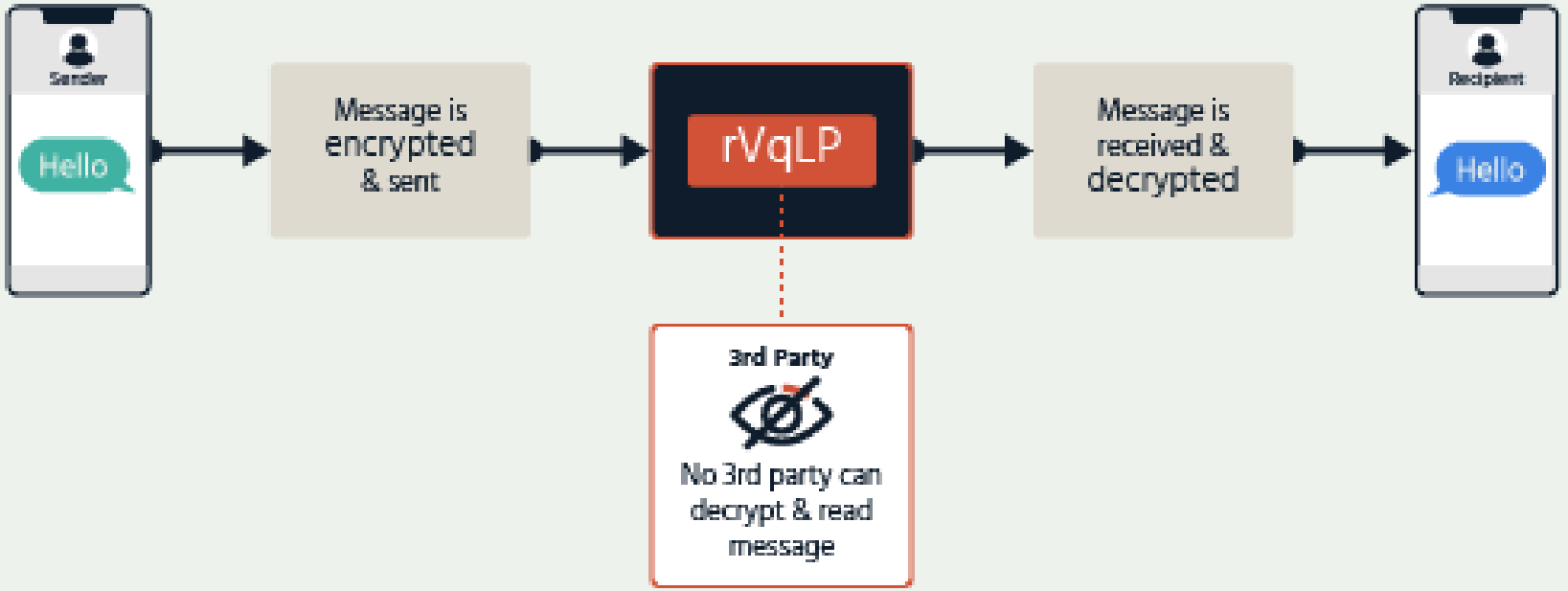
*Provider obliged to scan for content on user devices*

How it works:

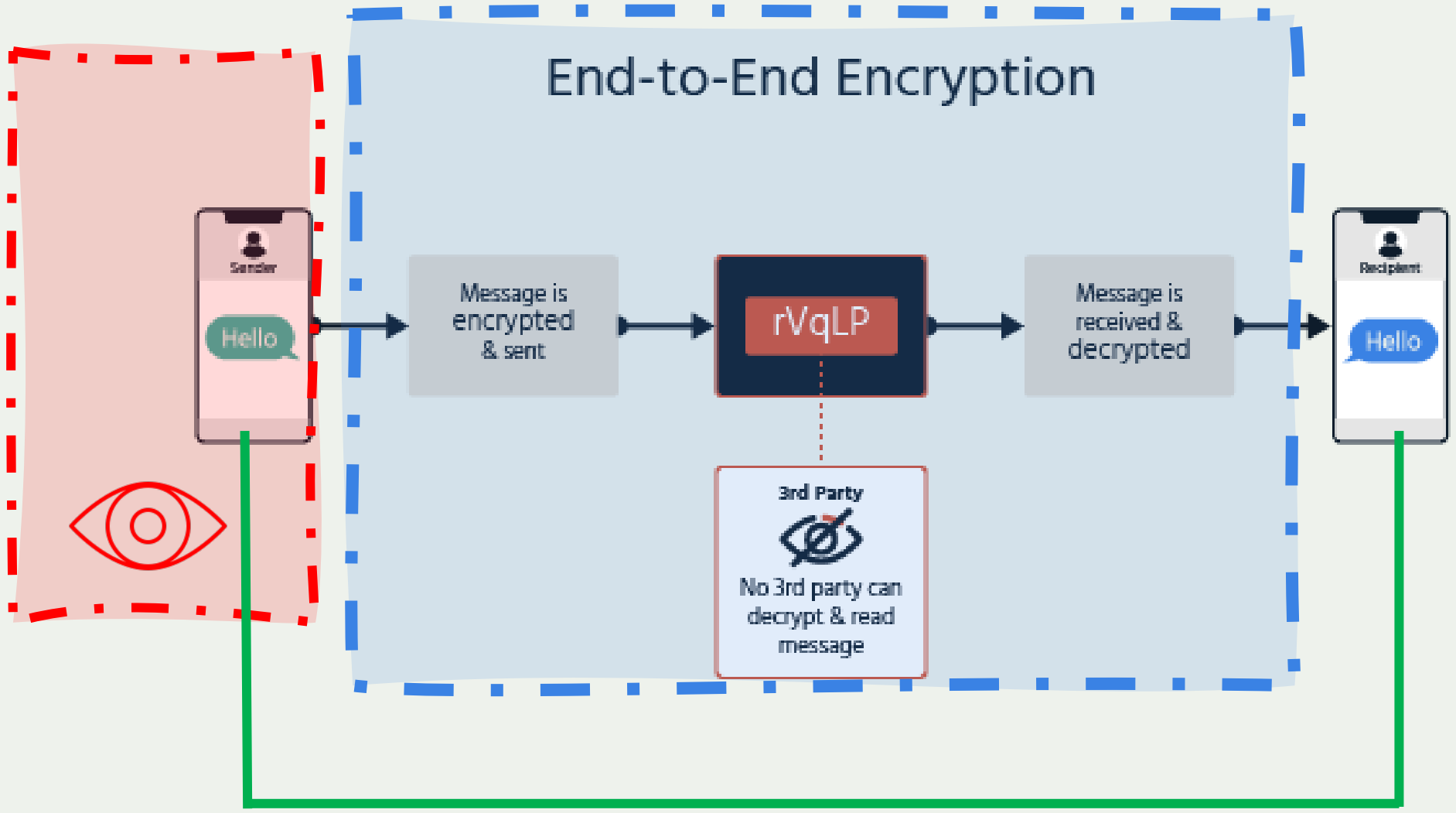
- Scanning happens on device (the client)
- Scanning results either processed on-device or off-device
- Hashes are created for scanning results
- Hashes compared against database of restricted content

# E2EE

## End-to-End Encryption



# CLIENT-SIDE SCANNING (IN E2EE)



# EU Child Sexual Abuse Regulation

European Commission

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Original proposal – encryption threatened

European Parliament

Private messaging removed from scope

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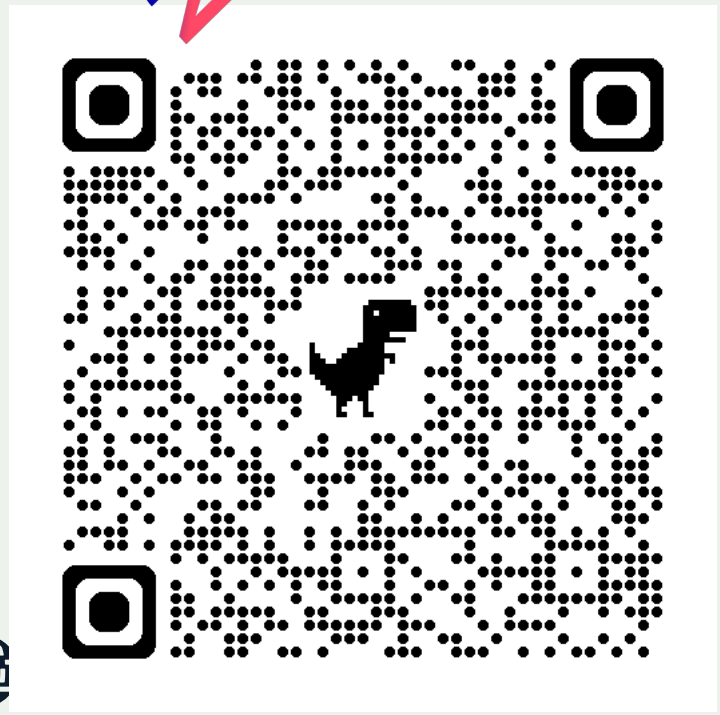
European Council
Council of the European Union

Known and uknown CSAM
Encryption messaging still in scope

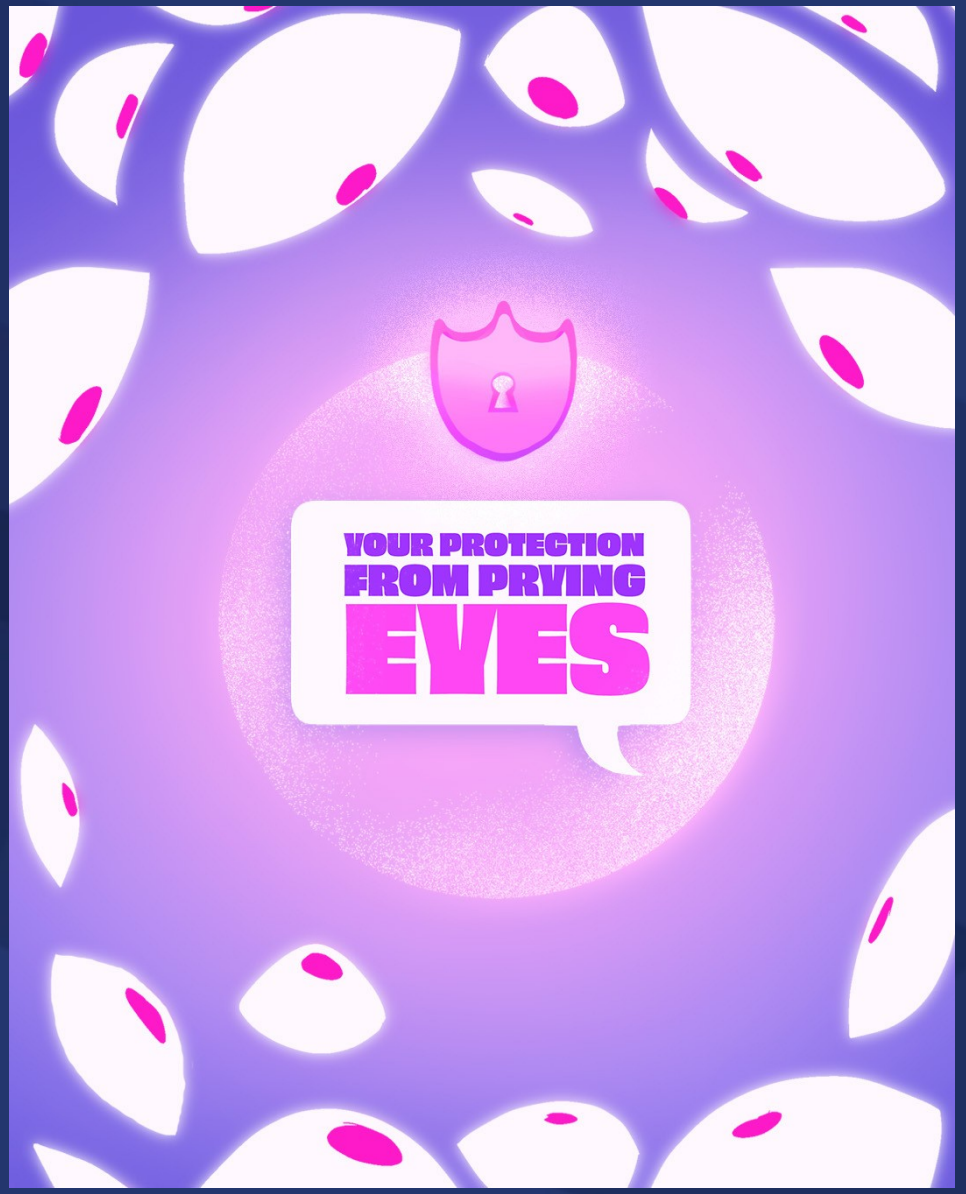
# EU Council text (Danish Text - October 2024)



<u>Global Encryption Coalition Steering Committee position</u>

- Mandated scanning
  - For both known and unknown CSAM
  - Technologies like client-side scanning
  - AI used in the case of unknown CSA
  - Surveillance of users without proven link to CSA crime

- On Encryption:
  - Narrow definition to protect ONLY “data in transit protected by means of encryption”
  - Require providers to undermine E2EE




- Mass scanning impact on rights:
  - surveillance of users without proven link to CSA crime
  - privacy risks and threat to exercise of human rights in digital space
  - government abuse – scanning for other types of material (scope creep)

- Efficacy:
  - Criminals can easily circumvent scanning, general public cannot (change file type, change bits in image)
  - False sense of security.
- Security:
  - Third party attacks on scanning system
  - Vulnerability in every device – attractive to criminals and hostile state actors


**Belgium:**

Mandated scanning: known and uknown CSAM


**Hungary:**

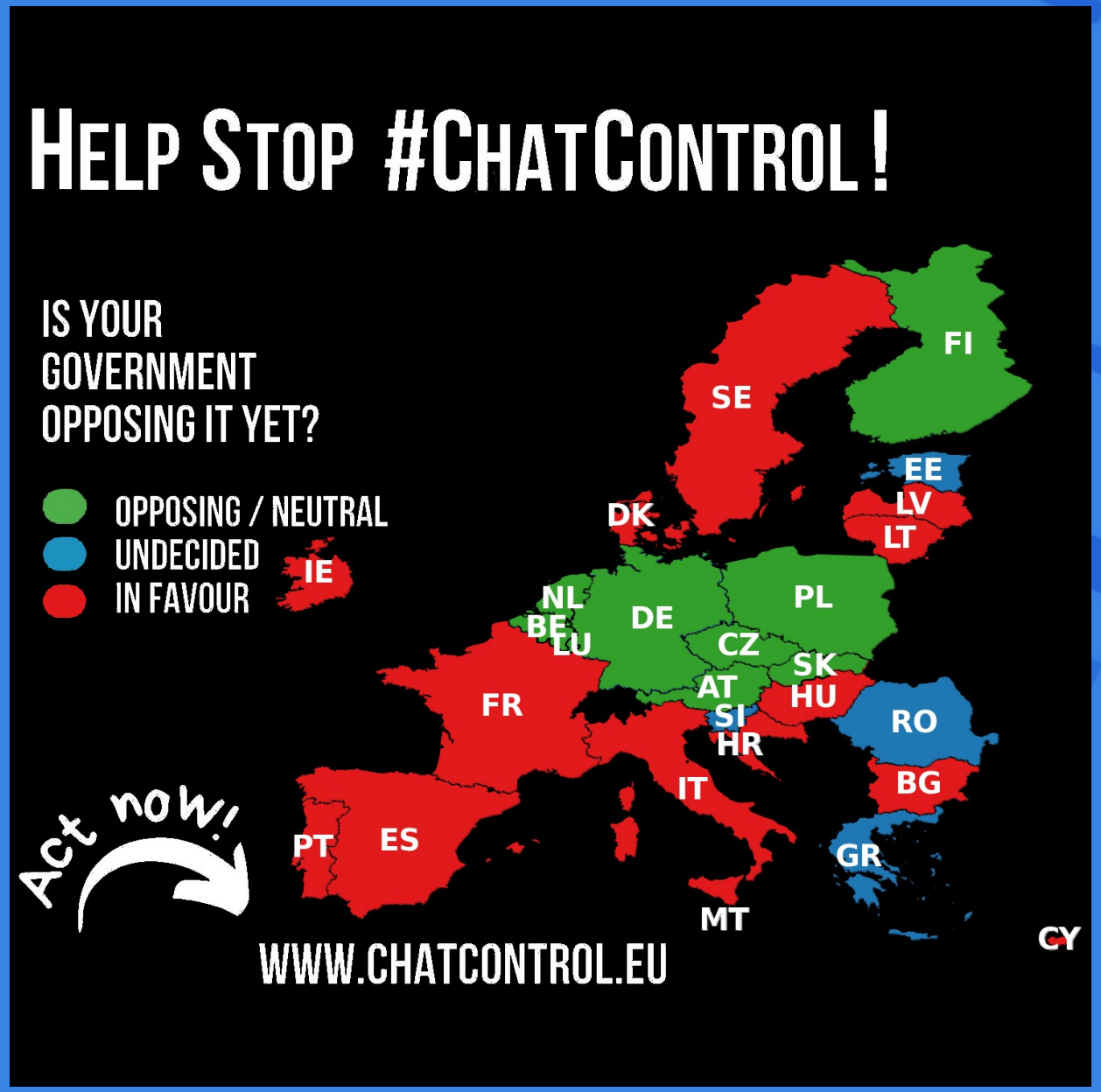
Mandated scanning: known CSAM only


**Poland:**

No mandated scanning in E2EE


**Denmark:**

Mandated scanning: known and uknown CSAM




# Council of the EU

**BLOCKING GROUP:**

- **Opposing Member States:** Poland, Germany, the Netherlands, Belgium, Luxembourg, Austria, Czechia, Finland, Slovakia.
- **Undecided Member States:** Romania, Estonia, Greece

# Cyprus takes over Presidency in January 2026

**Breaking encryption** is like tampering with an envelope while it transits through a post office. **Client-side scanning** is like reading the letter as it is being written.

In client-side scanning, the envelope is not tampered with, but the result is the same–the confidentiality agreement is violated.

# Thank you.

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# Security risks with Client-side scanning

PROCESSING ON DEVICE:

- Increased attack surface – reverse engineering
  - Circumvention
  - Criminal exploitation of scanning

PROCESSING OFF DEVICE:

- Attackers interfere with alerts sent between devices and server

Perceptual hashing:

- Security of multiple databases
  - Attackers could flood with false positives
  - Attackers introduce unauthorized material for scanning (i.e. facial recognition)

**Internet Society Analysis**