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TO:
Unit D.4: Cybercrime
Directorate-General for Migration and Home Affairs (DG HOME)
European Commission

Ref. Ares(2020)7284226 - 02/12/2020
Regulation of the European Parliament and of the Council on the detection, removal and reporting of child sexual abuse online, and establishing the EU centre to prevent and counter child sexual abuse

First of all, a lot of thanks to Directorate-General for Migration and Home Affairs (DG HOME) for organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.
PDF file of this opinion can be added to a relevant web page.

Annex 1 holds information about previous consultations at the European Union level.
Annex 2 holds information about copyright, licence and disclaimers.

Best Regards,

Jukka S. Rannila
citizen of Finland
signed electronically

[Continues on the next page]

42

43 About previous consultations / Repeating several issues

44

45 Annex 1 holds information about previous consultations. I have repeated the same issues several
46 times and previous consultation documents can be assessed critically. Different units of the
47 European Commission already know something about my previous opinions.

48

49 Highlighting only some issues

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51 This opinion does not handle all issues which are mentioned on the consultation document. I have
52 presented different issues to different units of the European Commission. Generally speaking many
53 proposals are already implemented and therefore I don't present all possible issues based on this
54 consultation.

55

**56 Consultation document is technologically neutral and does not mentioning any company
57 names**

58

59 It is fully understandable that the consultation document is technologically neutral. It is also fully
60 understandable that the consultation document does not mention specific company names.

61

62 European centre to prevent and counter child sexual abuse

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64 INCEPTION IMPACT ASSESSMENT document mentions following issue.

65

66 The Commission also committed in the strategy to work towards the possible **creation of a**
67 **European centre** to prevent and counter child sexual abuse to enable a comprehensive and
68 effective EU response against child sexual abuse online and offline, based on a thorough
69 study and impact assessment.

70

71 I have mentioned several times European Union contact points (EUCP) when assessing information
72 technology solutions for the European Union.

73

74 **NOTE: Naturally there can be global contact points for different information systems.**

75

76 Therefore I present member state systems (MSS), member state contact points (MSCP) and
77 European Union contact point (EUCP).

78

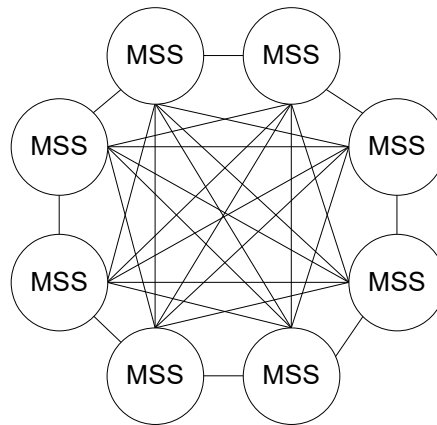
79 EU-wide level?

80

81 I have noted several times that different member state systems (MSS) can interlinked in many ways.
82 This means that co-operation with European Union systems means a lot of work. This leads to the
83 question of a European Contact Point (EUCP) for different member state systems (MSS).

84

1



MSS = Member State System

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88 There are 27 member states (European Union) at the moment. In reality there are unique situations
 89 with information systems in different member states. In some cases information systems can be
 90 implemented based on complex system-to-system connections. Complex system-to-system
 91 connections means a lot of work when there are changes in some systems.

92

93 Naturally there could be direct contacts between different member state systems (MSS) and
 94 European Union Contact Point (EUCP). This option (MSS ↔ EUCP) could mean very large
 95 number of different member state system. Based on 27 member state systems there could be
 96 hundreds of connections:

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98

$$27 \times 10 = 270 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$$

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$$27 \times 20 = 540 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$$

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$$27 \times 30 = 810 \text{ MSS} \leftrightarrow 1 \text{ EUCP}$$

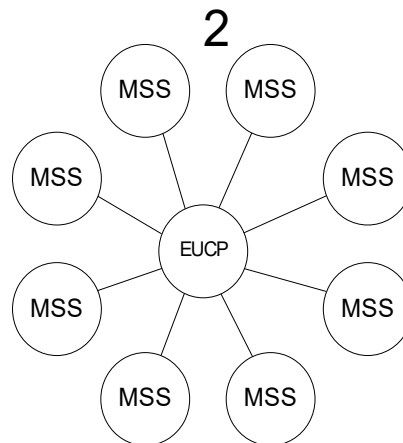
101

102 Here we can note that there can be hierarchy between different system (EU ↔ member states) and
 103 there can be member state contact points (MSCP). Then there can be some hierarchy between
 104 different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations
 105 with member state systems in member states. Therefore member state contact points (MSCP) can
 106 reduce the complexity with European Union contact point (EUCP)

107

108 Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude
 109 that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

110



MSS = Member State System, EUCP = European Contact Point

In the current situation, European Union member states (and some co-operation states) have their own internal IDs for several information systems. Also, the members states organised as a federation have their own internal problems with state-level IDs.

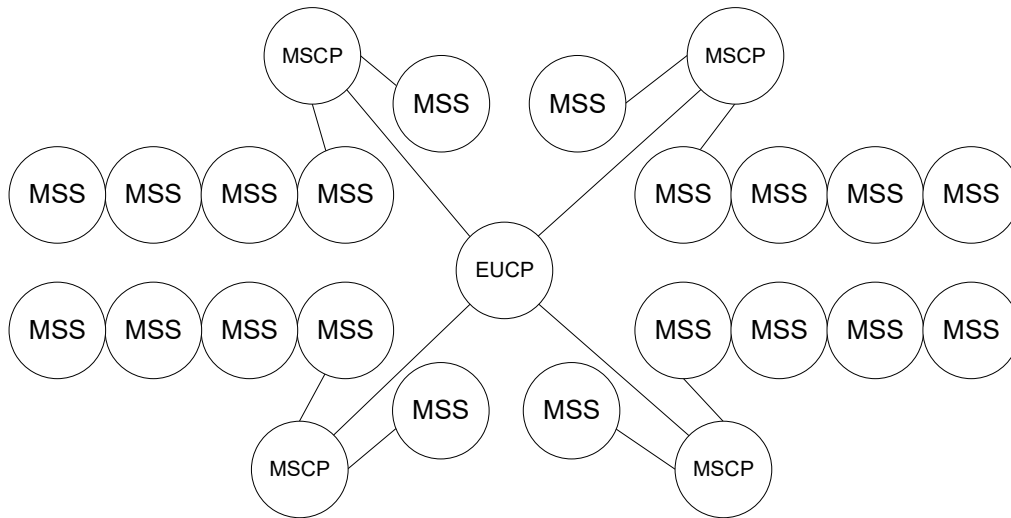
Based on those calculations there could be a lot of direct connections to the European contact point. Number of those connections can be overwhelming. The situation between member states can vary in many ways. So there can different and unique systems between member states.

On the other hand, there are some working examples of joined or federated EU-wide registers. However, the amount of administration and needed legally binding agreements is considerable.

Proposal : There could be one information system (member state contact point, MSCP) on member state level.

[Continues on the next page]

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MSS = Member State System

MSCP = Member State Contact Point, EUCP = European Contact Point

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The solution can be, that member states have own Member State Contact Points (MSCP) and different state level systems are combined gradually. Then the member state system IDs can be used in the European Contact Point (EUCP).

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Based on those large numbers connecting (MSS ↔ EUCP) member state system I have to conclude that there should be member state contact points (EUCP ↔ MSCP ↔ MSS).

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Here we can note that there can be hierarchy between different system (EU ↔ member states) and there can be member state contact points (MSCP). Then there can be some hierarchy between different systems. (EU ↔ EUCP ↔ MSCP ↔ MSS ↔ Member state). There are unique situations with member state systems in member states. Therefore member state contact points (MSCP) can reduce the complexity with European Union contact point (EUCP).

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Proposal: Different member state systems could be consolidated based on limited number system-to-system connections.

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Proposal: There could be some time frames for consolidating different member state systems (MSS) with member state contact points (MSCP).

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Proposal: There could be some time frames for consolidating member state contact points (MSCP) with the European Union contact point (EUCP).

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Proposal: One information system (member state contact point, MSCP) on member state level could handle system-to-system connections with the European Union level (European contact point).

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Proposal: There could be some serious work for developing a standardised member state contact point (MSCP).

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Proposal: After developing a standardised member state contact point (MSCP) different member states could consolidate their systems (MSS ↔ MSCP).

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Proposal: European Union contact point (EUCP) and member state contact points (MSCP) could then handle cooperation (EUCP ↔ MSCP ↔ MSS) on the European Union level.

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Naturally we have to note that developing a standardised member state contact point (MSCP) means more work. On the other hand a standardised member state contact point (MSCP) could handle cooperation (EUCP ↔ MSCP ↔ MSS) based on unique situations in member states. Some member states may have more systems than other member states. We have to note that there are different systems based on several technological solutions.

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An example for cooperation: Web feeds (RSS and Atom)

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I have advocated usage of web feeds ¹ on several previous opinion documents. Actually there are two standards for web feeds: RSS ^{2 3} and Atom ^{4 5 6}.

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Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different informations systems.

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Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-time) information for different stakeholder(s) (communities).

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Proposal: There can be different web feeds (RSS and/or Atom) for different stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible solution.

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Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.

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It can be easier to create web feeds in different information systems since web feeds enable

195

1 https://en.wikipedia.org/wiki/Web_feed

2 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

3 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS

4 [https://en.wikipedia.org/wiki/Atom_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

5 <https://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

6 <https://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

196 connections without direct system-to-system connections.

197

198 It can be noted, that different back-office systems (with a wide variety of different technologies) can
199 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
200 kind solutions front-office systems don't need direct system-to-system communications with back-
201 office systems.

202

203

204 **Creation of different feeds, not just general web feeds (RSS and/or Atom)**

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206 It is possible that there could be other feeds and not just RSS feeds.

207

208 **Proposal: There could be some assessment for creation of specific feeds for informing**
209 **issues related to this consultation.**

210

211 An example of a specific feed is the ClaimReview standard which is used for reporting fact-
212 checking reviews.

213

214 <https://schema.org/ClaimReview>

215

216 **NOTE: Creation of a specific standard (cf. ClaimReview) means cooperation between**
217 **several stakeholders which use and develop different information systems.**

218

219

220 **Good luck!!!**

221

222 This opinion is quite limited. Hopefully there are other constructive ideas presented in other
223 opinions. This remains to be seen.

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226 [Continues on the next page]

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ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the European Commission. General page to all consultations – both in English and in Finnish:

<http://www.jukkarannila.fi/lausunnot.html>

My opinions to the previous and relevant consultations – there consultations were mostly organised by the European Commission.

EN: Opinion 1: Review of the rules on access to documents

http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century

http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for Safe and Innovative medicines

http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft

http://www.jukkarannila.fi/lausunnot.html#nro_8

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments

http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress

http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

http://www.jukkarannila.fi/lausunnot.html#nro_18

- 272 EN: Opinion 19: Official Acknowledgement by the Commission
273 http://www.jukkarannila.fi/lausunnot.html#nro_19
274
- 275 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
276 http://www.jukkarannila.fi/lausunnot.html#nro_20
277
- 278 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
279 http://www.jukkarannila.fi/lausunnot.html#nro_21
280
- 281 EN: Opinion 23: Public consultation on the review of the European Standardisation System
282 http://www.jukkarannila.fi/lausunnot.html#nro_23
283
- 284 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
285 http://www.jukkarannila.fi/lausunnot.html#nro_27
286
- 287 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
288 http://www.jukkarannila.fi/lausunnot.html#nro_28
289
- 290 EN: Opinion 30: Internet Filtering
291 http://www.jukkarannila.fi/lausunnot.html#nro_30
292 NOTE: Organised by the European Committee for Standardization (CEN) ⁷
293
- 294 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
295 http://www.jukkarannila.fi/lausunnot.html#nro_32
296
- 297 EN: Opinion 34: REMIT Registration Format
298 http://www.jukkarannila.fi/lausunnot.html#nro_34
299 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁸
300
- 301 EN: Opinion 35: Exploiting the employment potential of the personal and household services
302 http://www.jukkarannila.fi/lausunnot.html#nro_35
303
- 304 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
305 http://www.jukkarannila.fi/lausunnot.html#nro_37
306
- 307 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
308 http://www.jukkarannila.fi/lausunnot.html#nro_39
309
- 310 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
311 http://www.jukkarannila.fi/lausunnot.html#nro_40
312
- 313 EN: Opinion 41: AT.39398: observations on the proposed commitments
314 http://www.jukkarannila.fi/lausunnot.html#nro_41

⁷ <http://www.cen.eu/> (Accessed 2 July 2012)

⁸ <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 315
316 EN: Opinion 42: Opening up Education
317 http://www.jukkarannila.fi/lausunnot.html#nro_42
318
319 EN: Opinion 43: Publication of extracts of the European register of market participants
320 http://www.jukkarannila.fi/lausunnot.html#nro_43
321 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
322
323 EN: Opinion 44: Evaluation policy guidelines
324 http://www.jukkarannila.fi/lausunnot.html#nro_44
325
326 EN: Opinion 45: About ICT standardisation
327 http://www.jukkarannila.fi/lausunnot.html#nro_45
328
329 EN: Opinion 46: Review of the EU copyright rules
330 http://www.jukkarannila.fi/lausunnot.html#nro_46
331
332 EN: Opinion 51: European Area of Skills and Qualifications
333 http://www.jukkarannila.fi/lausunnot.html#nro_51
334
335 EN: Opinion 52: Trusted Cloud Europe Survey
336 http://www.jukkarannila.fi/lausunnot.html#nro_52
337
338 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
339 http://www.jukkarannila.fi/lausunnot.html#nro_53
340 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
341
342 EN: Opinion 55: European Energy Regulation
343 http://www.jukkarannila.fi/lausunnot.html#nro_55
344 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
345
346 EN: Opinion 59: Green paper on mobile Health
347 http://www.jukkarannila.fi/lausunnot.html#nro_59
348
349 EN: Opinion 60: Cross-border inheritance tax problems within the EU
350 http://www.jukkarannila.fi/lausunnot.html#nro_60
351
352 EN: Opinion 61: European Register of Products Containing Nanomaterials
353 http://www.jukkarannila.fi/lausunnot.html#nro_61
354
355 EN: Opinion 64: Corporate Social Responsibility - European Commission
356 http://www.jukkarannila.fi/lausunnot.html#nro_64
357
358 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
359 http://www.jukkarannila.fi/lausunnot.html#nro_66

- 360 EN: Opinion 68: European Network Code Stakeholder Committees
361 http://www.jukkarannila.fi/lausunnot.html#nro_68
362 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
363
364 EN: Opinion 71: Common Schema for the Disclosure of Inside Information
365 http://www.jukkarannila.fi/lausunnot.html#nro_71
366 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
367
368 EN: Opinion 74: Enabling the Internet of Things
369 http://www.jukkarannila.fi/lausunnot.html#nro_74
370 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC) ⁹
371
372 EN: Opinion 80: Mandatory Transparency Register
373 http://www.jukkarannila.fi/lausunnot.html#nro_80
374
375 EN: Opinion 84: Revision of the European Interoperability Framework
376 http://www.jukkarannila.fi/lausunnot.html#nro_84
377
378 EN: Opinion 86: 2016 Annual Colloquium on fundamental rights
379 http://www.jukkarannila.fi/lausunnot.html#nro_86
380
381 EN: Opinion 88: Evaluation and Review of the ePrivacy Directive
382 http://www.jukkarannila.fi/lausunnot.html#nro_88
383
384 EN: Opinion 89: BEREC Guidelines for net neutrality rules
385 http://www.jukkarannila.fi/lausunnot.html#nro_89
386 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
387
388 EN: Opinion 93: Safety of apps and other non-embedded software
389 http://www.jukkarannila.fi/lausunnot.html#nro_93
390
391 EN: Opinion 95: Targeted consultation on eForms
392 http://www.jukkarannila.fi/lausunnot.html#nro_95
393
394 EN: Opinion 97: COM(2016) 882 final - 2016/0408 (COD)
395 http://www.jukkarannila.fi/lausunnot.html#nro_97
396
397 EN: Opinion 98: Opinions related to six (6) co-decision (COD) proposals
398 http://www.jukkarannila.fi/lausunnot.html#nro_98
399
400 EN: Opinion 99: COM(2016)0863 - European Union Agency for the Cooperation of Energy
401 Regulators. Recast
402 http://www.jukkarannila.fi/lausunnot.html#nro_99
403

⁹ <http://www.berec.europa.eu>, Body of European Regulators for Electronic Communications (BEREC)

- 404 EN: Opinion 100: Protection of personal data (EU)
405 http://www.jukkarannila.fi/lausunnot.html#nro_100
406
- 407 EN: Opinion 101: Governance of the Energy Union
408 http://www.jukkarannila.fi/lausunnot.html#nro_101
409
- 410 EN: Opinion 102: Smart Wearables
411 http://www.jukkarannila.fi/lausunnot.html#nro_102
412
- 413 EN: Opinion 106: Review of the European Union Agency for Network and Information Security
414 (ENISA)
415 http://www.jukkarannila.fi/lausunnot.html#nro_106
416
- 417 EN: Opinion 108: Single Digital Gateway
418 http://www.jukkarannila.fi/lausunnot.html#nro_108
419
- 420 EN: Opinion 110: Technical arrangements / Information systems / Union Customs Code
421 http://www.jukkarannila.fi/lausunnot.html#nro_110
422
- 423 EN: Opinion 111: Interoperability of information systems for migration and security
424 http://www.jukkarannila.fi/lausunnot.html#nro_111
425
- 426 EN: Opinion 113: Transform of health and care
427 http://www.jukkarannila.fi/lausunnot.html#nro_113
428
- 429 EN: Opinion 114: Premium content on ECS markets and the effect of devices on the open use of the
430 Internet
431 http://www.jukkarannila.fi/lausunnot.html#nro_114
432 NOTE: Organised by Body of European Regulators for Electronic Communications (BEREC)
433
- 434 EN: Opinion 118: Fake news and online disinformation
435 http://www.jukkarannila.fi/lausunnot.html#nro_118
436
- 437 EN: Opinion 119: European Social Security Number
438 http://www.jukkarannila.fi/lausunnot.html#nro_119
439
- 440 EN: Opinion 120: European Labour Authority
441 http://www.jukkarannila.fi/lausunnot.html#nro_120
442
- 443 EN: Opinion 121: 2nd Data Package
444 http://www.jukkarannila.fi/lausunnot.html#nro_121
445
- 446 EN: Opinion 122: Proposal to create a cybersecurity competence network with a European
447 Cybersecurity Research and Competence Centre
448 http://www.jukkarannila.fi/lausunnot.html#nro_122

- 449
450 EN: Opinion 123: Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF
451 THE COUNCIL on the re-use of public sector information (recast)
452 http://www.jukkarannila.fi/lausunnot.html#nro_123
453
454 EN: Opinion 125: Security of identity cards of Union citizens and of residence documents
455 http://www.jukkarannila.fi/lausunnot.html#nro_125
456
457 EN: Opinion 128: Summertime arrangements
458 http://www.jukkarannila.fi/lausunnot.html#nro_128
459
460 EN: Opinion 129: Format for a European Electronic Health Record (EHR) Exchange
461 http://www.jukkarannila.fi/lausunnot.html#nro_129
462
463 EN: Opinion 132: Informative guidance on the Regulation on the Free flow of non-personal data
464 http://www.jukkarannila.fi/lausunnot.html#nro_132
465
466 EN: Opinion 133: standard forms for the publication of notices in the field of public procurement
467 ("eForms")
468 http://www.jukkarannila.fi/lausunnot.html#nro_133
469
470 EN: Opinion 134: Update Implementing act on technical arrangements for the systems defined by
471 UCC
472 http://www.jukkarannila.fi/lausunnot.html#nro_134
473
474 EN: Opinion 139: Information management system for official controls Regulation (IMSOC)
475 http://www.jukkarannila.fi/lausunnot.html#nro_139
476
477 EN: Opinion 141: Farm Accountancy Data Network
478 http://www.jukkarannila.fi/lausunnot.html#nro_141
479
480 EN: Opinion 142: Horizon Europe (two consultations)
481 http://www.jukkarannila.fi/lausunnot.html#nro_142
482
483 EN: Opinion 144: Digitisation and online access of cultural material and digital preservation
484 (evaluation)
485 http://www.jukkarannila.fi/lausunnot.html#nro_144
486
487 EN: Opinion 146: Draft CWA by the CEN/WS - Journalism Trust Initiative
488 http://www.jukkarannila.fi/lausunnot.html#nro_146
489 NOTE: Organised by the European Committee for Standardization (CEN)
490
491 EN: Opinion 147: EU customs procedures - developing and upgrading electronic systems
492 http://www.jukkarannila.fi/lausunnot.html#nro_147
493

- 494 EN: Opinion 152: Revision of the Non-Financial Reporting Directive
495 http://www.jukkarannila.fi/lausunnot.html#nro_152
496
- 497 EN: Opinion 154: Strengthen the exchange of information framework in the field of taxation
498 http://www.jukkarannila.fi/lausunnot.html#nro_154
499
- 500 EN: Opinion 156: Elements of the data for "ICT usage and e-commerce" for the reference year
501 2021
502 http://www.jukkarannila.fi/lausunnot.html#nro_156
503
- 504 EN: Opinion 159: EU competition law - market definition notice (evaluation)
505 http://www.jukkarannila.fi/lausunnot.html#nro_159
506
- 507 EN: Opinion 161: New Competition Tool ('NCT')
508 http://www.jukkarannila.fi/lausunnot.html#nro_161
509
- 510 EN: Opinion 162: Digital Services Act package: ex ante regulatory instrument of very large online
511 platforms acting as gatekeepers
512 http://www.jukkarannila.fi/lausunnot.html#nro_162
513
- 514 EN: Opinion 165: Legislative framework for the governance of common European data spaces
515 http://www.jukkarannila.fi/lausunnot.html#nro_165
516
- 517 EN: Opinion 166: Sharing information between national business registers
518 http://www.jukkarannila.fi/lausunnot.html#nro_166
519
- 520 EN: Opinion 167: Interoperable digital public services - European Interoperability Framework
521 evaluation & strategy
522 http://www.jukkarannila.fi/lausunnot.html#nro_167
523
524
525
- 526 My opinions to the previous and relevant consultations – there consultations were mostly organised
527 by the European Commission. General page to all consultations – both in English and in Finnish:
528 <http://www.jukkarannila.fi/lausunnot.html>
529
- 530
531 [Continues on the next page]

532

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ANNEX 2

534 DISCLAIMERS

535

536 Legal disclaimer:

537 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am
538 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

539 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the
540 future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective
541 actor making those actions.

542

543 Political disclaimer:

544 These opinions do not represent opinions of any political party. These opinions are not advices to certain policy and
545 they are only intended to trigger thinking. Any law proposal based on these opinions are sole responsibility of that legal
546 entity making law proposals.

547

548 These opinions are not meant to be extreme-right, moderate-right, extreme-centre, moderate-centre, extreme-left or
549 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of
550 different sources. These opinions do not reflect past, current or future political situation in the Finnish, European or
551 worldwide politics.

552

553 These opinions are not meant to rally for a candidacy in any public election at any level.

554

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