



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR COMMUNICATIONS NETWORKS, CONTENT AND
TECHNOLOGY

Online Platforms: Society
DSA Monitoring and Cooperation

Brussels
CNECT.F.1/EE

**Subject: GENDER-BASED VIOLENCE AND ILLEGAL CONTENT ON
PORNOGRAPHIC PLATFORMS**

Dear Madam, / Dear Sir,

The European Commission's Directorate-General for Communications Networks, Content and Technology (DG CNECT) has commissioned a study on '**Gender-based violence and illegal content on pornographic platforms**', which is being carried out by the Centre for Strategy and Evaluation Services Europe (CSES).

The study is focused on three pornographic platforms (*Pornhub, XVideos, and XNXX*) designated as Very Large Online Platforms (VLOPs) under the Digital Services Act (DSA) (hereafter, the Three Designated Entities). The purpose of the study is to support the Commission's work into obtaining a timely understanding of how the Three Designated Entities implement and operationalise their obligations under the DSA, with a view to assessing compliance and informing effective enforcement.

Specifically, the study is to obtain information on the following obligations:

- Notice and action mechanisms under Article 16 DSA, in particular their user-friendliness and the timely, diligent, non-arbitrary and objective processing of notices received under these mechanisms.
- Risk assessment and mitigation of systemic risks under Articles 34 and 35 DSA, including the diligent assessment and effective mitigation of the dissemination of illegal content.

The study is to assess the extent to which the processes, mechanisms and tools of the Three Designated Entities sufficiently mitigate the risk of dissemination of *at least* the following types of illegal content:

- Sharing of images depicting child sexual abuse (CSAM) as covered by [Directive 2011/93/EU Child Sexual Abuse Directive](#).
- Non-consensual sharing of intimate or manipulated material ([Directive 2024/1385 on combating violence against women and domestic violence](#)).
- Cyber stalking (Directive 2024/1385, as above).

- Non-authorised use of copyright protected material ([Directive 2019/790 on copyright and related rights in the Digital Single Market](#)).
- Trafficking in human beings (THB) for sexual exploitation ([Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims](#)).

The examination of these processes, mechanisms and tools should place a dedicated focus on understanding the perspectives and lived and unique experiences of *users*, with the term users covering performers and content creators, as well as victims-survivors who have been affected by the dissemination of illegal content through the services of the Three Designated Entities.

An essential element for ensuring the quality of this study is to have **direct feedback from users**, as well as **representatives of users**. Hearing about user experiences with one or more of the Three Designated Entities would be extremely beneficial for the study.

To ensure the success of this exercise, the European Commission would be grateful if you could please assist the external contractor. This consultation will take the form of an **interview or a short online survey**. By providing them with your own views and opinions, you will support the external contractors in delivering a high-quality study that deepens the European Commission's understanding of how platform practices may shape societal risks and digital harms, strengthens Digital Services Act enforcement, and contributes to a safer, more accountable online environment.

CSES follows strict ethical standards and complies fully with the EU General Data Protection Regulation (GDPR). All personal data will be handled responsibly, stored securely, and anonymised where possible. Particular care will be taken when engaging with potentially vulnerable interviewees to ensure their well-being and informed consent. Participants will receive clear information about the research purpose and their rights, including the option to withdraw at any time. The team is committed to maintaining high ethical and data protection standards throughout the project.

Should you have any questions concerning this study please do not hesitate to contact the DG CNECT and CSES teams via email:

- DG CNECT: Eleonora Esposito: Eleonora.ESPOSITO@ec.europa.eu
- External contractor (CSES): James Eager: jeager@cses.eu.

Thank you in advance for your support

Yours sincerely,

Marco GIORELLO
Head of Unit