



REPUBLIC OF ESTONIA
MINISTRY OF THE INTERIOR

Senior Director for European Government and
Regulatory Affairs David Frautschy

Your: 17.10.2023

Our: 02.11.2023 No 5-1/50-2

Dear Sir,

Thank you for your open letter in regards to the regulation laying down rules to prevent and combat child sexual abuse (CSA Proposal).

We share your concern related to weakening of, or undermining the use of end-to-end encryption, this has been our issue with the regulation since it was first presented. As it has been presented in the official positions of the Government of Estonia (03.11.2022), we do not support the possibility of creating backdoors to end-to-end encryption solutions. At the same time, we may support the use of technologies which preserve privacy and allow analyzing the encrypted content without decrypting.

This right of extensive monitoring and checking private messaging significantly restricts the users' right to privacy and the protection of private life, message confidentiality, freedom of speech and expression. It also creates a dangerous trend in the legal system of European Union, as it creates the possibility of requiring the creation of backdoors into encryptions. This in turn increases the probability of cyber incidents, as the existence of such access path would so-to-say invite cyber criminals to seek ways to access other information being exchanged. The creation of backdoors reduces the security and integrity of services.

However, it is of the utmost importance to underline that we still see this proposed regulation to be very important in order to prevent child sexual abuse. So, we hope to see that there will be a compromise and we can move forward with the regulation.

Yours Sincerely,

Lauri Läänemets
Minister of the Interior