



# Annual Policy Report 2022

## Brussels Outlook 2023

### In brief

## Who we are

Founded in 1997, EuroISPA is the world's largest association of Internet Services Providers (ISPs), representing the interests of over 3,300 ISPs across the EU and EFTA countries.

EuroISPA is a collection of trade associations and companies from across Europe who work together to find common views on the main discussions on EU digital policy. With a membership of national associations of ISPs, EuroISPA is recognised as the voice of the European ISPs industry and its success lies in its reflection of the views of its members regardless of their shapes and sizes. EuroISPA engages at EU level on behalf of its members on a wide range of policy issues, including intermediary liability, data protection, cybersecurity, safer Internet, and much more. Through its active role in EU-level discussions, EuroISPA ensures that the ISP industry's voice is at the forefront of decisions impacting the future of the Internet.

## 25 years of EuroISPA

In the 25 years since its founding, EuroISPA has been the voice of European ISPs, engaging at EU level on key policy files such as the E-commerce Directive, the GDPR, the Copyright Directive, the DSA, the CSAM Regulation and many more.

"In its 25 years of activity, EuroISPA has grown immensely both in membership and in scope, to become the world's largest association of Internet Services Providers. The milestones of the past two decades make us proud, and give us the right impulse to strive for even bigger goals in the years to come. Now it's time for EuroISPA to rely on this longstanding expertise in the sector to shape the future of the Internet in the interest of European ISPs and all stakeholders of the ever-changing telecommunications market."

# Timeline of Policy Activities

## 2022

- JAN** Meeting with the Council of Europe on Digital Services Act (DSA)  
Meeting with CERTH-ITI on Terrorist Content Online (TCO)
- FEB** Speech at the Council of Europe 2022 Digital Partnership Workshop  
Meetings on e-evidence with Belgium, Romania, Estonia, and MEP Sippel
- MAR** Meeting with DG CNECT I.2 (Copyright Unit) on piracy of live content
- APR** Meeting with the French Council Presidency on the CSAM Regulation
- MAY** Meetings with the upcoming Czech and Swedish Council Presidencies on the CSAM Regulation  
Meeting with IWF on the CSAM Regulation
- JUN** Meeting with the European Commission on CSA Directive 2011/93 EU  
Meeting with MEP Vautmans and MEP Lenaers on the CSAM Regulation
- SEP** Meetings with Finland, the Netherlands, and Estonia on the CSAM Regulation  
Meeting with DG HOME on the CSAM Regulation  
Meeting with DG CNECT I.2 (Copyright Unit) on piracy of live content
- OCT** Meeting with Lithuania on the CSAM Regulation  
Meeting with ECTA, ETNO, and GSMA on the Russian sanctions
- NOV** Meeting with MEP Zarzalejos on the CSAM Regulation  
Meetings with MEP Frankowski and MEP Heide on piracy of live content
- DEC** Meeting with MEP Paul Tang on the CSAM Regulation

## 2023

- General** EuroISPA manifesto for the EU elections (September)  
EuroISPA 25th anniversary celebrations (November)
- Safer Internet** EuroISPA roundtable on privacy and encryption (March)  
Speaking at European Internet Forum on child safety online (March)  
EuroISPA amendments on CSAM Regulation and engagement meetings with European Parliament and Council
- Intermediary Liability** Stakeholder hearing on piracy (February)  
EuroISPA roundtable with European Commission (March)  
EuroISPA's reaction to European Commission Recommendation (May)  
DSA implementation analysis (TBC)
- Cybersecurity** EuroISPA webinar on the Open SIRIUS Project with Eurojust and Europol (February)  
Meeting with European Commission on CRA (March)  
E-evidence meetings with European Commission on decentralised IT system (April)  
EuroISPA analysis of e-evidence Regulation (June)  
High Level Group on LEA access to data (TBC)  
NIS 2 Implementation work analysis (TBC)
- Data economy** Trans-Atlantic Data Privacy Framework reaction (July)  
European Commission GDPR revision (September)
- Other** Meeting with European Commission on connectivity initiatives (March)

# Our Policy Work

## Cybercrime & Cybersecurity

In 2022, we engaged in the final stages of the negotiations of the e-evidence Regulation, calling for well-functioning cross-border cooperation between law enforcement authorities and service providers. We focused on ensuring the security and confidentiality of data transmitted between service providers and law enforcement authorities, which resulted in the development of a new EU wide digital exchange platform. We also focused on the NIS 2 Directive, working towards a framework that enhances digital security in the EU without creating burdensome requirements for ISPs. In 2023, we will focus on the smooth implementation of these files and will continue contributing to other initiatives such as the Cyber Resilience Act, whilst keeping a close eye on developments in data retention and encryption.

## Safer Internet

In 2022, we provided input to the European Commission on the Revision of the CSA Directive 2011/93/EU, moving the discussions away from a polarised debate and focusing on the technical implications. In 2023, we will closely monitor the developments of the directive in 2023, as well as the Better Internet for Kids Strategy.

## Intermediary Liability

In 2022, we focused on the DSA and the Recommendation on piracy of live content. We hosted events and reacted to the DSA plenary vote, and engaged with the European Commission on piracy of live content. In 2023 we will take part in further meetings and in a stakeholder hearing with the European Commission and rightsholders, as one of the few ISP representatives active on the issue. We will also monitor the implementation of the DSA as well as the upcoming delegated acts.

## Innovation & Growth

In 2022, we monitored the developments of the European online content legislative framework, including the national implementation of the EU Copyright Directive. In 2023, we will continue engaging on copyright issues. We plan to share our expertise on areas including audio-visual and video on demand (VoD), levies and rights management, geo-blocking and content portability, among others, with the aim of supporting the development of an ethical and cross-border online content market in the EU.

## Data Protection

In 2022, we engaged with policymakers on the proposal for an ePrivacy Regulation and followed the EU-US efforts to transition from the Privacy Shield framework, crucial topics for SMEs. In 2023, we will continue to advocate for a robust legal framework that ensures trust and innovation while safeguarding our network users' privacy and data protection. We will continue to work towards a new transatlantic agreement. We will support negotiators in establishing a consistent, workable ePrivacy framework, whilst keeping an eye on developments in the enforcement of GDPR, encouraging further harmonisation, and on never-ending flow of data protection rules.

## Market & Services

In 2022, we focused on accessibility requirements while following the discussions on the DMA. We also discussed the consequences for our sector of Russia's aggression against Ukraine, debating potential infrastructure disruptions and technical aspects concerning the EU-wide broadcasting prohibitions. In 2023, we will focus on the European Commission's Connectivity package.

# EuroISPA Members



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