

Mark Zuckerberg
CEO
Facebook
1601 Willow Rd
Menlo Park
CA 94025
USA



Thursday, 6th February 2020

Dear Mr Zuckerberg,

RE: Facebook's proposals to extend end-to-end encrypt messaging services

As a coalition of child protection organisations and experts from all parts of the world we are writing to express our significant concerns about your company's proposals to implement end-to-end encryption across your messaging services.

Unfortunately, Facebook has not yet satisfied us that our deeply held concerns will be satisfactorily addressed. We therefore urge you not to proceed with the rollout until and unless you can demonstrate there will be no reduction in children's safety as a result of this decision.

Strong encryption plays a hugely valuable role in keeping citizens and their data safe. We fully recognise that users of online services have a legitimate interest in ensuring their data is protected, and there seems to be a growing appetite for users to have greater control over how their data is used by tech companies. However, as you have stated yourself, Facebook has a responsibility to work with law enforcement and to prevent the use of your sites and services for sexual abuse, including grooming, the sharing of child abuse images, and children being coerced into sending self-generated images and videos.

In your blogpost of 6th March 2019, you recognised that *'there are real safety concerns to address before we can implement end-to-end encryption across all of our messaging services. When billions of people use a service to connect, some of them are going to misuse it for truly terrible things like child exploitation, terrorism, and extortion. But we face an inherent trade-off because we will never find all of the potential harm we do today when our security systems can see the messages themselves.'*

We urge you to recognise and accept that an increased risk of child abuse being facilitated on or by Facebook is not a reasonable trade-off to make. Children should not be put in harm's way either as a result of commercial decisions or design choices. Unless demonstrably successful mitigations can be put in place, it seems likely that the consequence will be more serious and sustained sexual abuse on Facebook's virtual properties.

At present, Facebook undertakes market-leading initiatives to identify and remove the most serious illegal content. In 2018, Facebook made 16.8 million reports to the National Center for Missing and Exploited Children (NCMEC). In the UK alone, this led to 2,500 arrests and 3,000 children being safeguarded. However, NCMEC estimates that as a result of end-to-end encryption, some 70 per cent of Facebook's reports – equivalent to 12 million reports globally – could be lost. At a time when we could be looking to build upon years of sophisticated initiatives, Facebook instead seems inclined to blindfold itself.

As child protection experts, we cannot overstate the strength of our concerns. Whereas today Facebook's products are primarily used by groomers to make initial contact with children, before migrating them to less scrupulous messaging or livestreaming sites, end-to-end encryption will embolden abusers to initiate and rapidly escalate abuse directly on Facebook's services.

If Facebook Messenger and Instagram Direct are both seamlessly integrated into large open platforms, abusers will be able to exploit existing design aspects to make easy and frictionless contact with large numbers of children, and then rapidly progress to sending end-to-end encrypted messages. This presents an unacceptable risk to children, and would arguably make your services unsafe.

Given the scale of these concerns, we call on Facebook to take the following measures:

- invest in safety measures which can demonstrate that the introduction of end-to-end encryption results in no net reduction to children's safety, including the ability of Facebook to scan for child abuse images and identify and disrupt abuse taking place on or through its services;
- demonstrate a willingness to embed a voluntary duty of care to protect children in your design decisions on encryption;
- consult widely with child protection experts, governments and law enforcement, so we can be satisfied any proposed mitigations are effective;
- agree to share necessary data with governments and child protection experts to determine the effectiveness of your mitigation strategy, and the impact that encryption has on threat behaviours;
- not proceed with the rollout of end-to-end encryption until you can ensure any proposed mitigations have been fully tested, and will adequately address our concerns.

We would be pleased to work closely with you to ensure that Facebook can deliver the benefits of end-to-end encryption without compromising your ability to disrupt abuse, and that of law enforcement to safeguard children and bring offenders to justice.

We trust you will respond meaningfully to the very serious concerns expressed in this letter, and agree to work productively to ensure children's safety on Facebook is not in any way jeopardised.

Yours sincerely,

The undersigned child protection organisations and experts from around the world:

University of California, Berkeley - Professor Hany Farid

Willamette University College of Law - Professor Warren Binford

Associate Professor of Criminology, University of New South Wales - Dr Michael Salter

Children's Charities' Coalition on Internet Safety - John Carr



Albania



Foundation Together Albania

CRCA (Children's Human Rights Centre of Albania)

Argentina

CASACIDN

Armenia

Hope and Help

Australia



the *Carly Ryan* foundation.

Austria

ECPAT Austria

Azerbaijan

Azerbaijan Children Union (ACU)

Bangladesh

Aparajeyo Bangladesh

Belarus

Children Not for Abuse

Belgium



ECPAT Belgium

Benin

CLOSE

Bhutan

RENEW (Respect, Educate, Nurture, Empower Women)

Bolivia

Consortio ECPAT Bolivia

Bosnia and Herzegovina

International Forum of Solidarity-EMMAUS

Botswana

Stepping Stones International (SSI)

Brazil

ECPAT Brazil

Bulgaria

sofenet.bg



Neglected
Children's
Society

Burkina Faso

ABSE

Burundi

Fédération Nationale des Associations engagées dans le Domaine de l'Enfance au
Burundi/FENADEB

Cambodia

Action Pour Les Enfants – APLE Cambodia

Cameroon

ASSEJA (Association, Enfants, Jeunes et Avenir)

Canada



Beyond Borders ECPAT Canada

Central African Republic

Centre pour la promotion et la Défense des Droits de l'Enfant (CPDE)

Chile

ONG Raices

Colombia



ECPAT Colombia/ Fundación Renacer

Costa Rica

Fundación PANIAMOR

Cote d'Ivoire

SOS Violences Sexuelles

Denmark

Save the Children Denmark

Dominican Republic

MAIS

Ecuador

Fundacion Quitu Raymi

Estonia



Lastekaitse Liit
Estonian Union for Child Welfare

Tartu Child Support Center

Finland



Suojellaan Lapsia
Protect Children

Save the Children Finland

France

ECPAT France

Gambia

Child Protection Alliance Gambia

Georgia

The Public Health Foundation of Georgia

Germany
ECPAT Germany

Ghana
GNCRC

Greece



ARIS – Association for the Social Support of Youth

Guatemala
ECPAT Guatemala

Guinea
Le Monde Des Enfants (MDE)

India



EQUATIONS

Indonesia
ECPAT Indonesia

Iraq
Jiyan Foundation for Human Rights

Italy
ECPAT Italy



Japan
ECPAT/STOP Japan

Jordan

Jordan River Foundation

Kazakhstan

National Network of NGOs of the Republic of Kazakhstan

Kenya

Kenya Alliance for Advancement of Children (KAACR)

Kyrgyzstan

Network of NGOs Fighting against CSEC in Kyrgyzstan

Latvia



Lebanon

Dar Al-Amal (House of Hope)

Liberia

Defence for Children International-Liberia

Lithuania



Luxembourg

ECPAT Luxembourg

Macedonia



Malawi

Eye of the Child

Malaysia

End CSEC Malaysia

Mauritius

Halley Movement & Pan-Mauritius Coalition

Mexico

ECPAT Mexico

Moldova

Network of National Organisations Fighting against Child Prostitution & Trafficking

Mongolia

Affiliate Group for ECPAT International in Mongolia

Morocco

AMANE

Mozambique

Rede da Criança

Nepal

CWIN-NEPAL

Netherlands

ECPAT Netherlands

New Zealand

ECPAT Child ALERT

Nicaragua

ECPAT in Nicaragua (TESIS)

Niger

Association Nigérienne pour le Traitement de la Délinquance et la prévention du crime (ANTD)

Nigeria

Women's Consortium of Nigeria (WOCON)

Norway

ECPAT Norway

Pakistan

Pakistan Pediatric Association

Palestine

SAWA, All Together

Paraguay

Grupo Luna Nueva

Peru

Peruvian Network against CSEC

Philippines

ECPAT Philippines

Poland

Empowering Children Foundation (formerly Nobody's Children Foundation)

Portugal



Romania

Save the Children Romania (Salvati Copiii)

Russia

Russian Alliance against CSEC

Rwanda

Coalition Umwana Ku Isonga

Samoa

Samoa Victim Support Group

Serbia

Network of Organisations for Children of Serbia – MODS

Sierra Leone

Defence for Children International-Sierra Leone

South Africa

Jelly Beanz Foundation

South Korea

Tacteen Naeil

Slovenia



Spain



PantallasAmigas

FAPMI / ECPAT Spain

Sri Lanka

ECPAT Sri Lanka / Protecting Environment and Children Everywhere (PEaCE)

Sweden

ECPAT Sweden

Switzerland

ECPAT Switzerland

Taiwan

ECPAT Taiwan

Tanzania

KIWOHEDE

Thailand

ECPAT Foundation Thailand

Togo

WAO-Afrique

Turkey

Network against Commercial Sexual Exploitation of Children in Turkey

Uganda

ECPAT Uganda/UCRNN

USA



United Kingdom

NSPCC

5Rights



Uruguay

Asociacion Civil Gurises Unidos

Uzbekistan

Tashkent Social Information Center "Istiqbolli Avlod"

Vietnam

Vietnam Association for Protection of Child's Rights (VACR)

Zambia

CHIN

Zimbabwe

Zimbabwe National Council for the Welfare of Children