

# Public consultation on measures to further improve the effectiveness of the fight against illegal content online

Fields marked with \* are mandatory.

## Introduction

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The availability and proliferation of illegal content online remains an important public policy and security concern in the EU, notably with regards to the dissemination of terrorist content, as well as of illegal hate speech, child sexual abuse material, or illegal commercial practices and infringements of intellectual property rights, selling of illicit drugs, counterfeits or other illicit goods.

The Commission adopted on 28 September 2017 a [Communication](#) with guidance on the responsibilities of online service providers in respect of illegal content online and a [Recommendation](#) on measures to effectively tackle illegal content online on 1 March 2018.

The Commission is collecting evidence on the effectiveness of measures and the scale of the problem, and will explore, by the end of 2018, further measures to improve the effectiveness of combating illegal content online.

In particular, through the present public consultation the Commission seeks to gather views from all relevant stakeholders. The questionnaire is targeted to the general public, hosting service providers such as online platforms, organisations reporting the presence of illegal content online, competent authorities and law enforcement bodies, and academia, civil societies and other organisations.

## About you

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\* Please indicate the capacity in which you are replying to this public consultation. Please note that the option you select will personalise the subsequent questions.

*at most 1 choice(s)*

- a) as an individual, in my personal capacity
- b) representing an online hosting service provider
- c) representing a business associations replying on behalf of online hosting providers
- d) representing a non-for-profit organisation identifying and reporting allegedly illegal content online
- e) representing a for-profit organisation identifying and reporting allegedly illegal content online
- f) representing a competent authority, including law enforcement authorities, internet referral unit, ministries or consumer protection authorities
- g) representing an organisation or business representing victims
- h) representing civil society organisation representing civil rights interests
- i) representing other industry association
- j) representing a research or academic organisation
- k) other

Other

50 character(s) minimum

European umbrella organisation representing the interests of optometrists and opticians across Europe.

## Section for other organisations, civil society, academia or other businesses and associations

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***Replying to the questionnaire is estimated to take 20 to 30 minutes and may require documenting answers with specific data.***

### General information about your organisation

\* Name of the organisation

50 character(s) maximum

European Council of Optometry & Optics

If your organisation is included in the Transparency Register, please indicate your ID number.

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation.

[Why a transparency register?](#)

40 character(s) maximum

03999415319-19

\* Should the European Commission need further details in relation to your answers, would you agree to be contacted by the Commission?

Yes  No

\* Email address:

secretariat@ecoo.info

\* In what country does your organisation have its headquarters?

Belgium

\* Is your organisation established in a/several EU Member State(s)?

a) Yes  
 b) No

\* Please briefly describe your organisation and/or provide a public URL.

500 character(s) maximum

The European Council of Optometry and Optics (ECOO) is the European organisation which represents the interests of optometrists and opticians from 24 countries. It aims to promote eye health to the public across borders and to harmonise clinical and educational standards of optometric and optical practice throughout Europe.

URL: [www.ecoo.info](http://www.ecoo.info)

The European Commission uses the following parameters to differentiate types of companies in terms of size. ([EU recommendation 2003/361](#))

| <b>Company category</b> | <b>Staff headcount</b> | <b>Turnover</b> | or | <b>Balance sheet total</b> |
|-------------------------|------------------------|-----------------|----|----------------------------|
| Micro                   | < 10                   | ≤ € 2 m         |    | ≤ € 2 m                    |
| Small                   | < 50                   | ≤ € 10 m        |    | ≤ € 10 m                   |
| Medium-sized            | < 250                  | ≤ € 50 m        |    | ≤ € 43 m                   |

\* Following this definition, your company is:

- a) A micro-enterprise
- b) A small enterprise
- c) A medium-sized enterprise
- d) Other

Please indicate if you are a user of the following types of online hosting services.

- a) E-commerce market place
- b) Collaborative economy
- c) Social networking
- d) Video or audio streaming
- e) File sharing
- f) News and media
- g) App distribution
- h) Rating and reviews
- g) Other

## Your experience: encountering illegal content online

While using the services mentioned here-above, did you come across the following types of content?

|   | Never                 | Once                  | Between 2 and 5 times | More than 5 times                | I don't know          |
|---|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| Child sexual abuse material   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Terrorist content   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Pirated content (e.g. music, films, books) or other audiovisual content   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Counterfeit goods (e.g. fake perfume, fake designer brands) or other types of intellectual property infringements   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Illegal hate speech (public incitement to violence or hatred directed against a group of persons or a member of such a group defined on the basis of race, colour, descent, religion or belief, or national or ethnic origin) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Scams, frauds, subscription traps or other illegal commercial practices)  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Content I deemed illegal for other reasons than the above.  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |

If you have encountered content you deemed illegal for other reasons than the above, please specify

*300 character(s) maximum*

NA

What action did you take after encountering the content referred to above? (Multiple options possible, should you have encountered different situations on different occasions.)

- a) No action
- b) I informed the platform hosting the content
- c) I contacted directly the person/organisation who had uploaded the content
- d) I alerted the police/relevant enforcement authorities
- e) Other action

If other, please specify

*50 character(s) maximum*

ECOO raised awareness among its members

Did you receive further information from the hosting service provider on what they intended to do as a follow-up of your notification?

- a) No

- b) Yes, general information on the process
- c) Yes, information about the final decision on taking the content down or keeping it online
- d) Other

What happened to the content you had reported? (Multiple options possible)

- a) It was taken-down
- b) It was kept online
- c) I do not know
- d) Other

## Your experience: removal of content online

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\* Have you tried to upload or post online content which was blocked or removed by a hosting service provider?

- a) No, never
- b) Yes, once
- c) Yes, several times
- d) I don't know

## Illegal content online

Please describe the challenges, obstacles and risks you are facing in tackling illegal content.

*1000 character(s) maximum*

1. Counterfeit products sold via the internet (incl. sunglasses, contact lens solutions etc.). These are difficult to identify and confusion arises also from increased spam despite firewalls. There has not been a thorough investigation to fully grasp the scope of this.
2. Products that are harmful to a person's eye, like coloured contact lenses for fashion purposes that do not meet EU standards (we hope this will be remedied through the medical devices legislation).
3. The online supply of contact lenses often fails to meet national regulatory requirements. There is also legal fragmentation, implying challenges around the switching of orders, as rules for websites differ per country.
4. Online practices around the supply of corrective glasses/other visual aids without a prescription and with insufficient information to patients/consumers. Rules around online prescription also differ per country. For instance, in Italy the online sale of prescription glasses is forbidden.

## Further measures for detecting, removing and preventing reappearance of illegal content

What features of notice systems and further measures do you consider to be most effective for enabling hosting service providers to make diligent decisions on the content notified? Please score the features on a scale from 1 (very effective) to 5 (not effective).

|   | 1                                | 2                     | 3                     | 4                     | 5                     | I don't know          |
|---|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Standardised, accessible and user-friendly online interface for reporting content | <input checked="" type="radio"/> | <input type="radio"/> |

|   |                                  |                                  |                       |                       |                       |                       |
|---|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Identification of content with unique identifiers (e.g. URLs) | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Possibility to file multiple notices                          | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Explanation of reasons and grounds of illegality              | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Allowing for anonymous notices                                | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Standardised, binding notice and action procedures            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other   | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please score the effectiveness of the following measures to support the cooperation between platforms and competent authorities/law enforcement bodies. Please use a scale from 1 (very effective) to 5 (not effective).

|   | 1                                | 2                                | 3                     | 4                     | 5                     | I don't know          |
|---|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Enhanced cooperation and exchanges between hosting service providers and competent authorities  | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Enhanced capabilities and training for national authorities and courts  | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Appointment of points of contact amongst hosting service providers within EU Member States for cooperation with competent authorities               | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Appointment of points of contact amongst law enforcement or other competent authorities for cooperating with hosting service providers              | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Technical interfaces between platforms and law enforcement or other competent authorities   | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Obligation to report illegal content to competent authorities for analysis and investigation  | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Setting time-limits to processing referrals and notifications from law enforcement or other competent authorities (such as internet referral units) | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other   | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

What further mechanisms would best support the cooperation between hosting services and trusted flaggers? Please score the mechanisms below on a scale from 1 (very effective) to 5 (not effective).

|   | 1                     | 2                                | 3                     | 4                     | 5                     | I don't know          |
|---|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Agreement between the platform and the trusted flaggers | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Trusted status agreed by a group of platforms           | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

|  |                       |                                  |                       |                       |                       |                       |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Certification of the trusted flaggers by national authorities                                | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Certification of trusted flaggers at EU level  | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Possibility to submit data feeding the hosting service provider's automated moderation tools | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Financial support to trusted flaggers by public authorities                                  | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Financial support to trusted flaggers by private entities on a voluntary basis               | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Setting time-limits to processing referrals and notifications from trusted flaggers          | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other  | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

What criteria should organisations fulfil to gain a privileged status ('trusted flaggers') when reporting content for removal?

*1000 character(s) maximum*

Trusted flaggers should be representative of the sector and have the best interest of the patient or consumer at heart. A balanced panel of assessors should be appointed that have solid knowledge and experience on the technical aspect of the products and good online practices.

What are the specific privileges (e.g. fast-track/immediate removal of content notified), and responsibilities such trusted flaggers should have, in your opinion, when flagging the different types of illegal content?

*1000 character(s) maximum*

Fast track access to the relevant authorities to present the case. Their responsibility would be to present a motivated recommendation based on evidence.

Please score the following measures to support the uptake and deployment of automated tools for removal of illegal content. Please score the measures below on a scale from 1 (very useful) to 5 (not useful).

|   | 1                                | 2                                | 3                                | 4                     | 5                     | I don't know          |
|---|----------------------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| Sharing of best practices between industry players                      | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Industry-governed sharing of software solutions                         | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Industry shared governance of databases supporting filtering technology | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

|   |                                  |                                  |                                  |                       |                       |                       |
|---|----------------------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| Industry shared governance of databases of training data for detection algorithms         | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Publicly supported databases for filtering content, training data, and/or technical tools | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Public investment in research and development   | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Private investment in research and development  | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Requirements to deploy automated tools for detecting and/or blocking content              | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Requirements to use shared databases for blocking content                                 | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other   | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

What safeguards should be put in place when using automated tools for the detection and removal of illegal content online? Please score the measures below on a scale from 1 (very useful) to 5 (not useful).

|   | 1                                | 2                                | 3                     | 4                     | 5                     | I don't know                     |
|---|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Transparency, in simple, clear language, of the general principles for the algorithmic decision-making  | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Transparent reporting on the accuracy indicators for the automated tools used                           | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Audits and error-detection tests for algorithmic filtering and algorithmic detection of illegal content | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| 'Human in the loop' principle: include human review in the processes leading to removal of content      | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Counter-notice procedures also when content removal /blocking is decided through automated means        | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Other   | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |

What are the most effective safeguards to counter erroneous removal of legal content? Please score the measures below on a scale from 1 (very effective) to 5 (not effective).

|  | 1                                | 2                                | 3                     | 4                     | 5                     | I don't know          |
|--|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Availability of counter-notice procedures  | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Information to the content provider on grounds for removal   | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Transparency on the process for removal  | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Transparent information on time from detection/notice to removal of the different types of content | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

|  |                       |                                  |                       |                       |                       |                       |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Transparent process for restoring content when counter-<br>notices have provided reasonable grounds to reject the<br>allegations of illegality | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Encourage the use of out-of-court dispute settlement   | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Cooperation with third-parties such as self-regulatory bodies<br>or competent authorities, for consultation in difficult cases                 | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other  | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please describe the challenges, obstacles and risks you are facing in tackling illegal content.

*1000 character(s) maximum*

The challenge of tackling illegal content:

Location outside the EU: some of the websites engaging in dubious practices are not located within the EU and there is uncertainty about who is behind it.

Location within the EU: There is generally a lack of understanding as to what constitutes good practices and what the legislative standard in the respective country is. ECOO developed two guidance documents to raise awareness on this topic (attached to this consultation).

Resources: There is no clear mechanism in place to identify and report any illegal practices in the sector. There is also a lack of resources to identify these effectively.

Expertise: There is generally a lack of understanding of how to deal with such online challenges, what the procedure and criteria are.

## Your opinion

In your opinion, who has an important role to play in tackling illegal content online?

|   | Main<br>role                     | Important<br>role                | Marginal<br>role      | I<br>don't<br>know    | No<br>answer          |
|---|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| Internet users  | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Hosting service providers   | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Public and other competent authorities and<br>law enforcement bodies                | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Private entities affected by the spread of<br>illegal content (e.g. rights holders) | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Individual victims affected by illegal content                                      | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Civil society and other organisations with<br>expertise who flag illegal content    | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other   | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

To what extent do you agree with the following statements?

|  | Strongly agree                   | Agree                            | Neutral               | Disagree              | Strongly disagree     | I don't know                     | No answer             |
|--|----------------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| * The Internet is safe for its users.  | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| * It is important that there are arrangements in place so that no illegal content is spread on the Internet.   | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| * It is important that freedom of expression is protected online.  | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| * Hosting service providers should process all notifications they receive and assess the legality of the content notified.                                   | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| * When content is flagged as illegal by private organisations with proven expertise , hosting services should speed up the process for removing the content. | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| * When content is flagged as illegal by competent authorities or law enforcement bodies, platforms should speed up the process for removing the content      | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| * When online hosting services remove content, users should be able to contest this decision by contacting the service (counter-notice).                     | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| * The regulatory framework is effective against illegal content.   | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| * Hosting service providers are effective in tackling illegal content.   | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

In your opinion, is there a need for further measures to tackle illegal content online?

|  | Strongly agree        | Agree                            | Neutral               | Disagree              | Strongly disagree     | I don't know          | No answer             |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Through proactive measures taken by hosting service providers and other relevant actors.                                   | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Via legislative measures.  | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Actions should be taken at EU level to put appropriate measures in place.  | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Different types of illegal content should be dealt with in different legal frameworks, to take into account specificities. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

Are there additional comments you would like to make? Please detail, in particular, if your answers refer to different experiences, different types of illegal content, etc.

*500 character(s) maximum*

ECOO is strongly aware of the emerging problem of counterfeit products or illicit practices in the optometry & optical sector. In this regard, ECOO is looking to equip the sector with the right knowledge and tools to respond to this important and evolving development. Patient and consumer safety are high on ECOO's agenda and given the increase of e-commerce it is important to ensure that healthcare professionals and patients are aware of and protected against illegal content and practices.

Please feel free to upload a concise document, such as a position paper of relevance to this public consultation. *Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation.*

The maximum file size is 1 MB

## Your contribution

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Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N° 1049/2001](#)

- can be published with your organisation's information** (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that your organisation remains anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

## Contact

[cnect-consultation-illegal-content@ec.europa.eu](mailto:cnect-consultation-illegal-content@ec.europa.eu)

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