

Brussels, 12 April 2019

Dear Members of the European Parliament,

We, the undersigned organisations, are writing to you ahead of the plenary vote on the **Proposal on Preventing the Dissemination of Terrorist Content Online** on Wednesday 17th April with an urgent concern which we would like to bring to your attention.

We welcome the improvements the committees, and particularly the LIBE Committee have made to the initial text and we urge you to **reject any further Amendment which undermines those improvements**.

We regret, however, that **the adopted text still makes the untenable requirement to remove content within 1 hour from receipt of removal orders**. Hosting service providers cooperate and work together with civil society and enforcement agencies to do their utmost at removing and preventing the dissemination of harmful and terrorist content. An inflexible and rigid provision, however, could have unintended consequences both on European users' fundamental rights and on the Internet ecosystem.

**This extremely short deadline, coupled with onerous sanctions, would entail over-removal of lawful content which will negatively impact the freedom of expression and related fundamental rights of European users.** Similar concerns have been expressed by the three UN Special Rapporteurs in their [joint opinion](#) and by the [European Union Agency for Fundamental Rights](#).

Furthermore, the proposed timeframe does not take into account the size and economic capacity of hosting service providers. European small and medium-sized enterprises not operating a 24/7 service, for instance, would not be able to comply with removal orders being sent outside of working hours. Finally, there is no evidence to suggest that the 1-hour timeframe upon receipt of the removal order is appropriate or necessary to reduce the threat of terrorist content spreading online.

We would, therefore, like to urge you to **vote in favour of a more pragmatic approach that would mandate hosting service providers to execute removal orders “as soon as possible”, instead of in 1 hour**. Such an amendment would be compliant with European citizens' fundamental rights and protect the competitiveness of digital businesses while ensuring a useful framework of cooperation between hosting service providers and Member States to tackle the dissemination of terrorist content online.

Sincerely,

**Access Now**, defends and extends the digital rights of users at risk around the world -

<https://www.accessnow.org/>

**Aktion Freiheit statt Angst e.V.** - <https://www.aktion-freiheitstattangst.org/>

**Center for Democracy and Technology (CDT)** – <https://cdt.org/>

**CZ.NIC** - <https://www.nic.cz/>

**eco** - Association of the Internet Industry - <https://international.eco.de/>

**EuroISPA**, the pan-European association of Internet Services Providers Associations –

[www.euroispa.org](http://www.euroispa.org)

**Finnish Federation for Communications and Teleinformatics (FiCom)** -

<https://www.ficom.fi/english>

**Hermes Center** for Transparency and Digital Human Rights - <https://www.hermescenter.org/>

**Homo Digitalis**, focuses on the protection of Internet users in Greece -

<https://www.homodigitalis.gr/>

**ISPA Austria** - <https://www.ispa.at/english.html>

**XNet** - Internet Freedoms - <https://xnet-x.net>



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**Homo Digitalis**  
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