



In consultation with



*Brussels, Belgium
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To the kind attention of:

Ms. Henna Virkkunen, Executive Vice-President for Tech Sovereignty, Security, and Democracy, European Commission
Mr. Magnus Brunner, Commissioner for Internal Affairs and Migration, European Commission
Ms. Hadja Lahbib, Commissioner for Equality, Preparedness and Crisis Management, European Commission
Mr. Glenn Micaleff, Commissioner for Intergenerational Fairness, Youth, Culture and Sport, European Commission
Ms. Roberta Metsola, President of the European Parliament
Honorable Members of the European Parliament

Letter to the European Commission and European Parliament on Protecting the Public from Abusive AI-Generated Content across the EU

Artificial Intelligence (AI), like any transformative technology, brings immense opportunities. The current EU mandate is in a position to harness the power of AI for the benefit of European citizens and the European economy, driving innovation and competitiveness. Equally, across the EU, AI services and solutions need to remain deserving of the public's trust and continue to be deployed in a way that protects people against misuse.

To support these efforts, Microsoft is presenting today a *White Paper on Protecting the Public from abusive AI-generated content across the EU*. The paper, drafted in consultation with global and European organizations¹, aims to highlight the problem, outlines steps that Microsoft is taking as a part of a comprehensive approach to combat abusive AI generated content, and provides a number of policy recommendations informed through consultation with the underlined organizations. The potential proliferation of abusive AI-generated content poses significant risks to vulnerable groups in our society. These risks include the potential for the creation of synthetic child sexual abuse material (CSAM), AI-powered scams targeting older adults, and the weaponization of synthetic non-consensual intimate imagery (NCII) against women.

The Internet Watch Foundation (IWF) is already seeing the impact of generative AI. Over one month alone in 2024 the IWF detected over 3,000 images of synthetic CSAM on the dark web, and of those, 90% were

¹ *Women Political Leaders (network of women serving in public office), Internet Watch Foundation, WeProtect Global Alliance, European Seniors Union, MenABLE*

realistic enough to be assessed under the same laws as real CSAM. Additionally, older adults are increasingly targeted by AI-powered scams, with 2024 studies revealing that 42.5% of detected fraud attempts were found to have been using AI, representing a 2,137% increase in the last three years. Finally, misuse of AI is having a chilling effect on the ambitions of women and girls in public life. A 2019 report by Sensity AI found that, even before the onset of Generative AI, 96% of so-called “deepfakes” were pornographic, and of those, 99% were made of women.

Advancing innovation and safety will require a balanced, whole-of-society approach. Strong political leadership is all the more important as we stand at the beginning of a new era of technological innovation. The EU has an opportunity to lead and to implement a regulatory framework that addresses the risks associated with abusive AI-generated content in an effective and proportionate way.

The paper looks at how existing legal frameworks can be implemented to ensure a strengthened response to specific online harms targeting three important groups – children, women and older adults - while enabling Europe to continue to innovate with AI.

Protecting Children from Online Exploitation

1. Modernize legislation through the adoption of the Recast of Directive 2011/93/EU ‘on combating the sexual abuse and exploitation of children and child sexual abuse material’.
2. Start discussions to extend the ePrivacy interim derogation (April 2026) and continue to develop a long-term legal framework to address CSAM.
3. Establish an expert taskforce to study AI-enabled child sexual exploitation.
4. Meaningfully adopt the Annual Youth Policy Dialogue mentioned in the mission letter of Executive Vice-President for Tech Sovereignty, Security and Democracy, Henna Virkkunen.

Safeguarding Women from Non-Consensual Intimate Imagery

1. Adopt the Directive on ‘violence against women and domestic violence’ and ensure strong implementation mechanisms.
2. Expand, where possible, the scope of the Directive to explicitly include deepfake ‘nudes’.
3. Prioritize legal clarity and implementation of the EU’s legal framework, including the Digital Services Act (DSA), so existing tools are appropriately leveraged to tackle NCII.

Safeguarding Older Adults from AI-Enabled Fraud

1. Recognize that detecting AI-generated fraud is a legitimate purpose under existing and new EU data protection legislation.
2. Ensure better intergenerational solidarity in the new EU mandate.

Cross-Harm Recommendations

1. Examine a prohibition on the stripping, tampering with or removal of provenance metadata.
2. Support and enhance public education campaigns on AI and synthetic content as laid out in the 2023 Council Recommendations on digital education and training.

The recommendations in this paper aim to contribute to a much-needed dialogue on abusive AI-generated content risks in Europe and we welcome additional ideas from stakeholders across the digital ecosystem to address harms to children, women, and older adults. Safeguarding digital services from abusive content and conduct requires strong collaboration among policymakers, civil society, and the technology industry as well as ongoing education and public awareness efforts. By proactively addressing these issues, we can build a future where AI enhances human creativity, protects individual privacy, and strengthens the foundations of our democracy.

We share and stand ready to support the EU's vision of AI that works for people and that is a force for good in society and we look forward to working with you on achieving this goal.

Sincerely,



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Vice-President, European Government Affairs, Microsoft*

In consultation with



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*Ms. Silvana Koch-Mehrin, President, Women
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