



Bundesnetzagentur checklist for the content and structure of a report pursuant to Article 5(5) of the Terrorist Content Online Regulation¹

December 2025

1. Background

In accordance with Article 5(5) of the Terrorist Content Online Regulation, a hosting service provider is required, upon receipt of a decision taken by the Bundesnetzagentur pursuant to Article 5(4) or (6) of the Terrorist Content Online Regulation, to submit a report detailing the specific measures that the hosting service provider has taken or intends to take. The report must be submitted within three months of receipt of the Bundesnetzagentur's decision and on an annual basis thereafter, unless agreed otherwise with the Bundesnetzagentur. This obligation ends once the Bundesnetzagentur decides that the hosting service provider is no longer exposed to terrorist content.

Pursuant to section 1(2) of the German Act addressing terrorist content online (Terrorist Content Online Regulation), the Bundesnetzagentur is the competent authority for monitoring a hosting service provider's implementation of specific measures under Article 5 of the Terrorist Content Online Regulation.² Analysing the report drawn up by the hosting service provider is therefore a key element of the Bundesnetzagentur's statutory mandate.

2. Aim

The Bundesnetzagentur's aim with this document is to assist the hosting service providers concerned in drawing up the report, by setting out its recommendations for the content and structure. This is intended to simplify and speed up the procedure.

¹ [Regulation \(EU\) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online](#)

² [Gesetz zur Durchführung der Verordnung \(EU\) 2021/784 des Europäischen Parlaments und des Rates vom 29. April 2021 zur Bekämpfung der Verbreitung terroristischer Online-Inhalte \(Terrorist Content Online Regulation\) \(in German\)](#)

3. The Bundesnetzagentur's recommendations

The following section presents the basic recommendations for drawing up the report. Where the Bundesnetzagentur has additional or other recommendations in individual cases, these will be found in the letter accompanying the decision pursuant to Article 5(4) or (6) of the Terrorist Content Online Regulation or will be clarified in a subsequent agreement.

Structure, file format and destination address

- **Table of contents:** If a report consists of more than five pages, the report should have a table of contents in order to provide a good overview of the report's content (see annex).
- **File type:** If the report is submitted electronically, it should be sent as a PDF file.
- **Destination address:** The email address to which the report should be sent is tco@bnetza.de.

Note: the report must be in German.

a) Key data

The following empirical data should be provided at the beginning of the report:

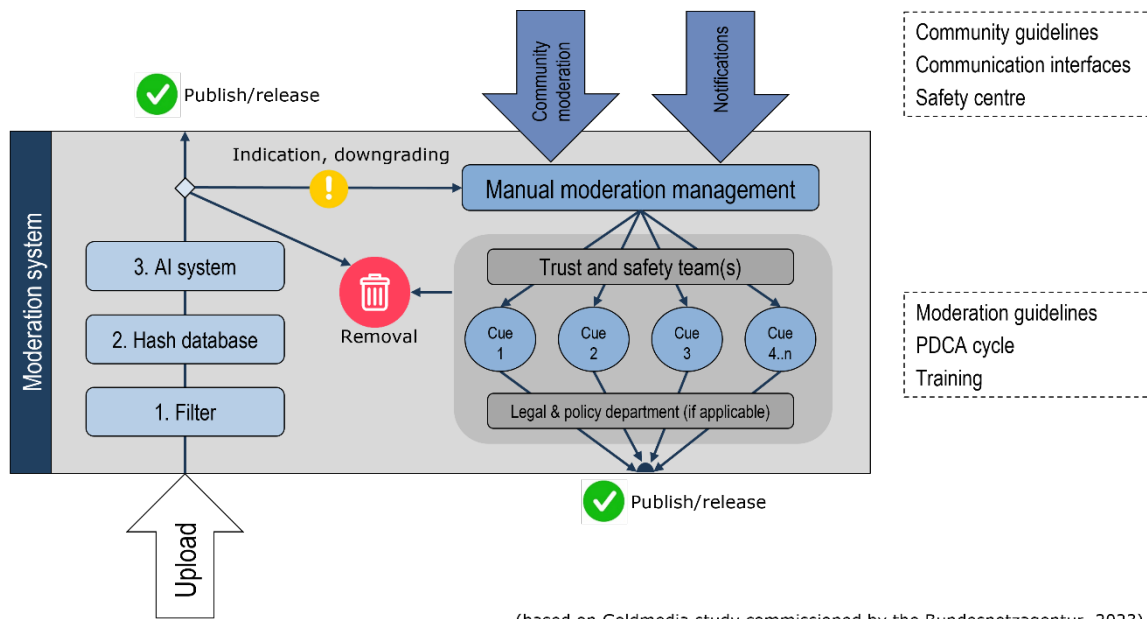
- Current number of registered users
- Development in the number of registered users in the past five years
- Average monthly number of new content uploads (for example images, sound recordings, videos, forum posts)
- Total number of content items currently available
- Total number of terrorist content items removed in the whole period under review and per year
- Number of reports per year from authorities, non-governmental organisations or communities flagging terrorist content that was subsequently removed
- Number of terrorist content items identified by the hosting service provider per year, if possible with a breakdown according to the specific measure leading to identification
- Total size of team (full-time equivalents, internal and external) working on the specific measures (including general legal issues, content moderation team and technical implementation)

b) Specific measures already taken

An appropriately titled section should describe the technical and organisational measures already taken. "Already taken" means that the measure is already implemented in regular operations.

If the service offering comprises different functionalities, it makes sense to describe the measures for each functionality, since not all measures are necessarily suitable for all functionalities. Functionalities can include: forums, shops/workshops, options for comments, presentation of user profiles or user groups, file uploads. The Bundesnetzagentur's preliminary letter specifies the functionalities that it has identified for which measures should be described.

- **Moderation architecture:** The description of the individual measures should be preceded by a description of the existing moderation architecture (a diagram like the example below can be used).



- **Presentation of the measures:** All the measures already taken at the time of drawing up the report have to be presented.
- **Specification of the measures:** When specifying the individual measures, the [list](#) of possible measures available under “Specific measures” in the [“Questions and answers”](#) section on the Bundesnetzagentur’s website can be used.
- **Details of each measure:**
 - **(Technical) objective:** What is the specific (technical) objective that is achieved with the measure?
 - **Process:** How is the measure implemented? What happens at each stage? A diagram may be helpful to understand the process.
 - **Date of implementation:** Since when has the measure been implemented in regular operations?
 - **Personnel:** How many persons are involved in implementing the measure and what are their professional qualifications (for example legal expert, linguist, moderator, technical expert)?
 - **Outsourcing:** If all or parts of the measure is/are outsourced to third parties. The information should include a description of how the hosting service provider checks the outsourced work.
 - **Scope for adjustments:** How quickly (minutes/hours/days) can adjustments be made to respond to new developments (such as attacks)? For instance, how quickly can new terms in blacklists or hash values for new images/videos, etc be implemented?
 - **Languages and phenomena:** Which languages and phenomena (for example terrorism with a jihadist/right-wing/left-wing/separatist background) are covered?
- **Matrix:** Please use the attached matrix to provide an overview of all the measures in addition to the written explanations.

c) Planned specific measures

This section of the report should describe the planned measures. The planned measures for each functionality should be described:

- **Presentation of the measures:** All the planned measures (not yet part of regular operations) should be presented.
- **Specification of the measures:** The list available in the Bundesnetzagentur's "[Questions and answers](#)" section can be used when specifying these measures.
- **Details of each measure:** The description should cover the same points as for measures already taken, with the addition of an approximate date by which the measure is due to be incorporated into regular operations.
- **Matrix:** Please use the attached matrix to provide an overview of the measures. The measures already taken and the planned measures can be listed together in one matrix.

d) Mechanisms for monitoring effectiveness

This section of the report should describe the mechanisms used or to be used to monitor the effectiveness of measures already taken and of planned measures.

- **Checking for effectiveness:** How is/will the measure be checked for effectiveness?
- **Preventing circumvention:** Which mechanisms are/will be used to prevent the measures being circumvented?
- **Further training and procurement of information:** How and where do you, as the hosting service provider, find out about new developments, that is new potential terrorist content such as terrorist groups, attacks, images, videos, hash value tables? For instance, do you use publicly accessible information such as that available from the EU-subsidised projects TATE³, FRISCO⁴ or ALLIES⁵ or do you use other resources?

³ <https://tate.techagainstterrorism.org/>

⁴ <https://friscoproject.eu/>

⁵ <https://www.alliesproject.com/>

4. Annexes

Example of table of contents of a report

1. Key data

Note: see section 3 a) for expected content.

2. Specific measures already taken

- 2.1 Community directives
- 2.2 Word filtering system
- 2.3 Content hashing
- 2.4 Multilingual moderation team
- 2.5 Training for the moderation team
- 2.6 ...

Note: provide details as set out in section 3 b) for each individual measure.⁶

3. Planned specific measures

- 3.1 Restrictions for auto-complete functions
- 3.2 Enable content flagging by users and third parties
- 3.3 Set up efficient feedback loops
- 3.4 ...
- 3.5 Time plan for implementation

Note: provide details as set out in section 3 c) for each individual measure.

4. Mechanisms for monitoring effectiveness

- 4.1 Mechanisms for checking effectiveness
- 4.2 Identifying possible circumventions
- 4.3 Measures to detect new developments

Note: see section 3 d) for expected content.

⁶ The specific measures listed under 2 and 3 are given as an example and should be included depending on their actual use. Measures that are not taken and will not be taken in the future do not have to be listed.

Matrix for classifying measures already taken and planned specific measures according to functionalities

Example:

	Shop	User profiles, user groups	Forum	File sharing
Terms and conditions	Since 4 April 2021	Since 4 April 2021	Since 4 April 2021	Since 4 April 2021
Notification portal for users and third parties	Since 2 June 2021	Since 5 June 2021	-	Planned as from 3 February 2026
Word filtering system	Since 4 April 2021	Since 4 April 2021	Since 4 April 2021	Planned as from 6 July 2026
Content hashing	Since 6 May 2023	Since 6 May 2023	-	-
Multilingual moderation team	Since 13 July 2021	Since 13 July 2021	Since 13 July 2021	Since 13 July 2021
Cooperation with private flaggers	-	Planned as from 24 August 2026	Planned as from 24 August 2026	-
Moderation guidelines for the moderation team	Since 4 April 2021	Since 4 April 2021	Since 4 April 2021	Since 4 April 2021

Generic template:

	Functionality 1	Functionality 2	Functionality 3	Functionality n
Specific measure 1	Since dd [month] yyyy	Planned as from dd [month] yyyy	Since dd [month] yyyy	
Specific measure 2	Since dd [month] yyyy	Since dd [month] yyyy	-	
Specific measure 3	Since dd [month] yyyy	Planned as from dd [month] yyyy	Since dd [month] yyyy	
Specific measure 4	Planned as from dd [month] yyyy	Since dd [month] yyyy	-	
Specific measure n				