

ATTENTION: 43th Parliament, Standing Committee on Access to Information, Privacy and Ethics, Ottawa
ON

Dear Mesdames et Messieurs:

We would like to thank the Committee for its work in attempting to hold Pornhub / Mindgeek accountable for the distribution of child sexual abuse materials (CSAM). Please provide the attached letter from a group of Kaska Advocates to Yukon ISP Northwestel to each member of the Standing Committee for their consideration.

We urge the Committee to produce a report that recommends additional legislative, criminal code, and regulatory measures to prevent the production and distribution of child sexual abuse materials. Relying on "industry standards" and self-regulation has failed to protect children and youth from harm. We ask the Committee to recommend companies operating in Canada adopt measures like Safe Surf used by Swedish company Com Hem, where devices automatically block pornography and subscribers can choose to opt-in to viewing pornography images.

We further ask the Committee to expand the scope of its investigation, and to provide notice to every Internet Service Provider operating in Canada that the public finds their complicity in the distribution of illegal child sexual abuse material unacceptable. We call for legal measures to prevent ISPs from continuing to make financial profit from the distribution of CSAM that is readily accessible to children, youth, and adults over the Internet.

Thank you,

Lois Moorcroft
Whitehorse, YT



LIARD ABORIGINAL WOMEN'S SOCIETY

BOX 3, WATSON LAKE, YUKON, Y0A 1C0

PHONE: 867-536-2097, Fax: 867-536-2810

EMAIL: laws@northwestel.net

Gūdené K'éh Gūs'āni: Following Our People's Way, Kaska Advocacy Training

March 31, 2021

Attention: Curtis Shaw, President, Northwestel. By email: kcampbell@nwtel.ca

Dear Sir:

Last year we reported to you our concern about children being harmed by the ease with which they can access graphic, violent, and illegal pornographic content on the Internet. We are disappointed by your response. As an Internet Service Provider (ISP), Northwestel and its parent company Bell should do more to prevent the rampant distribution of child sexual abuse material.

The manufacturers of sexually exploitative, violent and criminal abuse in pornographic images of children, and the internet providers who benefit financially from its distribution, should bear the responsibility for ending the crime of child rape and the distribution of child sexual abuse material. As a corporation, Northwestel should take responsibility by adopting measures like Safe Surf used by Swedish company Com Hem, where devices automatically block pornography and subscribers can choose to opt-in to viewing pornographic images.

As Leanna McDonald, Executive Director of the Canadian Centre for Child Protection recently told the 43th Parliament Standing Committee on Access to Information, Privacy and Ethics “relying upon the voluntary actions of companies has failed society and children miserably.”

Evidence presented to the Parliamentary Ethics Committee as it investigates MindGeek and Pornhub exposed the proliferation of child sexual abuse material (otherwise known as CSAM), and non-consensual material that harms children and youth. “Our two-decades-long social experiment with an unregulated Internet has shown that tech companies are failing to prioritize the protection of children online. Over the last decade, there has been an explosion of digital media platforms hosting user-generated pornographic content [in] a complete absence of meaningful regulation. ... Transparency and accountability are notably absent. Children have been forced to pay a terrible price for this. *Through our collective inaction we have facilitated the development of an online space that virtually has no rules, certainly no oversight and that consistently prioritizes profits over the welfare and the protection of children.*” Leanna McDonald, Executive Director of the Canadian Centre for Child Protection, Feb 5, 2021 <https://www.ourcommons.ca/DocumentViewer/en/43-2/ETHI/meeting-21/evidence>).

Northwestel replied to our concerns by saying that “Canadian laws and industry standards do not permit ISP’s from blocking Internet content that is not in contravention of the law” and that it encourages its customers to investigate 3rd party applications to block content. In Canada’s unregulated environment, Northwestel and Bell are only two of many individual companies that are not doing enough to keep child sexual abuse material off their servers. We know that illegal pornographic images are streamed through your ISP and are available to children and youth in our communities.

When individual companies decide the scale and scope of their moderation practices, they fail to prevent the distribution of child sexual abuse material. This is evident by the fact that recently MindGeek/Pornhub removed between 8 and 10 million videos from the Internet after victims of child sexual abuse whose images were posted online filed a class action lawsuit in Quebec, international media exposure about the illegal actions of the multi-billion dollar pornography industry, a lawsuit in California, and Visa and Mastercard suspending its services to the company.

How can you be confident that Northwestel is preventing the distribution of child sexual abuse material over the Internet which would be in violation of the law? What monitoring systems does Northwestel use to prevent the distribution of child sexual abuse material streaming over its Internet service?

In the last decade, how many reports has Northwestel made to the police and to the Canadian Centre for Child Protection regarding the distribution of child pornography images, to comply with *An Act respecting the mandatory reporting of Internet child pornography by persons who provide an Internet service?* ([S.C. 2011, c. 4](#))

As an ISP, what actions do you intend to take over the next three months to improve Northwestel's ability to monitor for child pornography and to prevent its distribution?

What profits does Northwestel and Bell garner from hosting pornography channels on the Internet?

Considering our request to you for Northwestel accountability, and the evidence that has been presented to the 43rd Parliament Standing Committee on Access to Information, Privacy and Ethics, what will your company do differently now to prevent the distribution of child sexual abuse and exploitation, ensure privacy and data protection for children and youth, monitor pornography websites, and report criminal activity?

We look forward to your response.

Sincerely,

[Signatures redacted: Ann Maje Raider, Lois Moorcroft, Charlene Magun, Katelyne Porter, Carla Boss, Leda Jules, and more... See next page]

- c. Liard First Nation, Daylu Dena Council, Ross River Dena Council
Yukon MP Larry Bagnell
43th Parliament, Standing Committee on Access to Information, Privacy and Ethics
Yukon Women's Coalition, Whitehorse YT
Annette King, Yukon Child and Youth Advocate

March 31, 2021

KASKA ADVOCATES and LIARD ABORIGINAL WOMEN'S SOCIETY

QUESTIONS TO NORTHWESTEL, Yukon Telecom and Internet Service Provider

1. How can you be confident that Northwestel is preventing the distribution of child sexual abuse material over the Internet which would be in violation of the law?
2. What monitoring systems does Northwestel use to prevent the distribution of child sexual abuse material streaming over its Internet service?
3. In the last decade, how many reports has Northwestel made to the Canadian Centre for Child Protection regarding the distribution of child pornography images, to comply with *An Act respecting the mandatory reporting of Internet child pornography by persons who provide an Internet service*? ([S.C. 2011, c. 4](#))
4. In the last decade, how many reports has Northwestel made to the police regarding the distribution of child pornography images, to comply with *An Act respecting the mandatory reporting of Internet child pornography by persons who provide an Internet service*? ([S.C. 2011, c. 4](#))
5. As an ISP, what actions do you intend to take over the next three months to improve Northwestel's ability to monitor for child pornography and to prevent its distribution?
6. What profits does Northwestel and Bell garner from hosting pornography channels on the Internet?
7. Considering our request to you for Northwestel accountability, and the evidence that has been presented to the 43rd Parliament Standing Committee on Access to Information, Privacy and Ethics, what will your company do differently now to prevent the distribution of child sexual abuse and exploitation, ensure privacy and data protection for children and youth, monitor pornography websites, and report criminal activity?

Ann Maje Raider, Lois Moorcroft, Leda Jules, Dorothy Smith, Mary Maje, Charlene Magun,
Carla Boss, Amanda Buffalo, Allan Wade, Colleen Caesar

- c. Liard First Nation, Watson Lake, YT
Daylu Dena Council, Lower Post, BC
Ross River Dena Council, Ross River, YT
MP Larry Bagnell, Whitehorse, YT
43th Parliament, Standing Committee on Access to Information, Privacy and Ethics, Ottawa ON
Yukon Women's Coalition, Whitehorse, YT
Annette King, Yukon Child and Youth Advocate, Whitehorse YT

FROM, by email, KASKA ADVOCATES and LIARD ABORIGINAL SOCIETY:

lawsadmin@northwestel.net; lois.moorcroft@gmail.com; majeraider@yahoo.ca

BY EMAIL TO:

Curtis Shaw, President, Northwestel
kcampbell@nwtel.ca

COPIES:

Liard First Nation, Watson Lake, YT
ea@liardfirstnation.ca; chief@liardfirstnation.ca

Daylu Dena Council, Lower Post, BC
harlan.schilling@gmail.com; executivedirector@dayludenacouncil.com

Ross River Dena Council, Ross River, YT
jackcaesar21@gmail.com; megan.ladue@rrdc.ca

MP Larry Bagnell, Whitehorse, YT
Larry.Bagnell@parl.gc.ca

43th Parliament, Standing Committee on Access to Information, Privacy and Ethics, Ottawa ON
ETHI@parl.gc.ca

Yukon Women's Coalition, Whitehorse, YT
eaywth@northwestel.net

Annette King, Yukon Child and Youth Advocate, Whitehorse YT
Annette.King@ycao.ca