From: Codes
Sent: Thursday, 8 January 2026 5:02 PM
To: s 47F @x.com
Cc: s 47F ; s 22 ; s 22 ; Codes
Subject: Correspondence from eSafety's General Manager - CSEM on X [SEC=OFFICIAL]
Attachments: 20260108 Letter to X re CSEM and Grok.pdf

OFFICIAL

Dear s 47F ,

Please find attached correspondence from eSafety's General Manager of Regulatory Operations in relation to child sexual exploitation material on X.

The correspondence requests your response by 16 January 2026.

Kind regards,

eSafety

eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past, present and future.

Australian Government | eSafetyCommissioner

8 January 2026

s 47F
s 47F
X
By email: s 47F **@x.com**

Dear s 47F,

Further to eSafety's correspondence of 13 May 2025, 17 April 2025, 8 April 2025, 15 October 2024 and 27 August 2024, we remain concerned that eSafety continues to identify child sexual exploitation material (**CSEM**) widely advertised and shared on X, including in a manner likely to expose the public to this extremely harmful material.

Despite the comments made by X's Chief Executive Officer over three years ago that 'removing child exploitation is priority #1'[1] and your statement recently on a call with eSafety on 26 November 2025 that child safety was a priority for X, the availability of CSEM continues to appear particularly systemic on X. eSafety has not identified CSEM to be as readily accessible on any other mainstream service.

While X's actions to address bot accounts in October 2025 appears to have had an impact on the use of some previously commonly used hashtags and terms to advertise CSEM, the measures appear to have been inadequate and ineffective at preventing continued widespread dissemination of CSEM and use of hashtags to advertise this material.

We are concerned that apparently innocuous hashtags appear to be coopted to advertise CSEM, particularly when used together. eSafety found CSEM amongst other material using combinations of the hashtags: #s 7(2). The fact that some of these terms have innocuous uses means users are likely to be inadvertently exposed to CSEM despite seeking to the use the X service in a legitimate manner.

While X takes action on eSafety's content notifications for specific CSEM, X's responsibilities are broader than such reactive action. As you are aware, regardless of whether X is regulated

[1] Elon Musk, X; 24 November 2022, URL https://x.com/elonmusk/status/1595671290421170179?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1595671290421170179%7Ctwgr%5E53a53c8fc533c1315c5e66f1d91fa41200f99497%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fwww.bloomberg.com%2Fnews%2Farticles%2F2022-11-29%2Fmusk-s-cuts-decimated-twitter-team-tackling-child-sexual-abuse

under the *Social Media Services Online Safety Code (Class 1A and Class 1B Material)* or the *Online Safety (Relevant Electronic Services— Class 1A and Class 1B Material) Industry Standard 2024*, it is required to proactively detect, disrupt and deter CSEM.

Our concerns regarding CSEM on X have been accentuated by recent reporting regarding the Grok AI-feature on X generating 'undressing' images of children and adults, in breach of X and Grok's own terms of service. Even more concerning, the Internet Watch Foundation has reported that material generated includes depictions of child sexual abuse of children between 11 and 13.[2] eSafety is currently reviewing a number of complaints about 'undressing' material generated by Grok on X and, subject to that assessment, will consider whether to issue removal notices to X under the *Online Safety Act 2021* (Cth) (the **Act**), and/or take other actions.

X's statement[3] on 4 January 2026 regarding this activity referred to removing relevant material and suspending accounts involved, but did not refer to any changes X intended to implement on its service to prevent future misuse of Grok on X from taking place.

In addition to the 'undressing' material, recent analysis by AI Forensics suggests Grok is also generating terrorist content and posting it on X.[4]

In relation to the industry codes and standards under the Act, while Grok is also a separate service and regulated under the *Online Safety (Designated Internet Services— Class 1A and Class 1B Material) Industry Standard 2024*, X is responsible for the feature's implementation on the X service.

We request you respond to this correspondence by 16 January 2026 with any actions X has taken, or will take, in relation to:

1. the ongoing prevalence of CSEM on X including the use of common hashtags to advertise this material;

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[2] Sky News, quotes from Ngaire Alexander, head of hotline at the Internet Watch Foundation, 7 January 2026, URL: https://news.sky.com/story/illegal-child-abuse-material-generated-by-xs-artificial-intelligence-grok-says-uk-watchdog-13491658

[3] X Safety; 4/1/2026: URL https://x.com/safety/status/2007648212421587223?s=46&t=sfB_goPNqOx9v0Ysp-oHLA

[4] AI Forensics Post and Report on LinkedIn, 7 January 2026, URL: https://www.linkedin.com/posts/aiforensics_grok-ai-images-activity-7414252008783646720-j7AO?utm_source=li_share&utm_content=feedcontent&utm_medium=g_dt_web&utm_campaign=copy

2. the generation by Grok on X of 'undressing' material involving adults and children; and

3. minimising, disrupting and deterring the generation by Grok of CSEM and pro-terror material on X.

This request is voluntary. However, any information you choose to provide will be used to assess X's compliance with its relevant obligations.

eSafety will not regard any response from X as privileged.

Yours sincerely,

s 22

Heidi Snell

General Manager, Regulatory Operations

From: s 47F @x.com>
Sent: Thursday, 8 January 2026 5:46 PM
To: Codes
Cc: s 47F ; Heidi Snell; s 22 ; s 47F
Subject: Re: Correspondence from eSafety's General Manager - CSEM on X [SEC=OFFICIAL]

Dear eSafety

Thank you for your email and letter - I acknowledge receipt and we will revert.

Kind regards

s 47F

On Thu, 8 Jan 2026 at 06:01, Codes <s 47E(d) @esafety.gov.au> wrote:

OFFICIAL

Dear s 47F ,

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Kind regards,

eSafety

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