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Children's rights must be safeguarded in the Digital Omnibus proposals

We, civil society networks representing more than 300 organisations in 41 countries, with the support of experts and the European Parliament Intergroup on Children's Rights and united in our commitment to build a safer and rights-respecting digital environment for children, call for the European Union to ensure that the future Digital Omnibus strengthens — and in no sense undermines — hard-won and critical protections for children's rights online.

The European Union has established itself as a global leader upholding and promoting children's rights in the digital environment. Together with the Digital Services Act (DSA) and the Audiovisual Media Services Directive (AVMSD), the General Data Protection Regulation (GDPR) and the Artificial Intelligence Act (Al Act) establish groundbreaking and critical regulatory requirements to protect children

in line with international law¹ and their obligations under Article 24 of the Charter of Fundamental Rights.

Recognising the significant harms children are currently suffering and the urgency of action, the EU's leadership, Institutions, and Member States have all firmly committed to prioritising the implementation and enforcement of these laws for children, and to further strengthening the protections afforded to them.

Amending legislation could be an opportunity to boost the implementation and enforcement of the EU's tech regulations and deliver for children. Instead, the Digital Omnibus risks weakening them and exposing children to further risk and harms, as well as undermining EU democracy in the face of external and corporate pressure.

We call on the European Commission to fully safeguard children's rights and establish protections as enshrined in the GDPR and AI Act. Weakening these protections in any way – for example by delaying implementation of key components of the AI Act or introducing loopholes allowing for the exploitation of children's data for training AI systems – would be an unacceptable betrayal of the EU's commitment to children, parents, and its own values.

We look forward to strong and progressive draft legislative proposals that respect European law and democratic process, and to working with the co-legislators to further strengthen the EU's leadership in shaping a rights-respecting digital world that delivers for our children and generations to come.

Signatories:

5Rights Foundation

Borns Vilkar

Child Helpline International

Child Rights International Network (CRIN)

ChildX

COFACE Families Europe

ECPAT International

Eurochild

Missing Children Europe

Save the Children

¹ The UN Convention on the Rights of the Child has been ratified by all EU Member States. The <u>General Comment no 25 to the UNCRC</u> sets out how these rights apply in the digital environment.

Stiftung Digitale Chancen

The Norwegian Consumer Council

The Swedish Consumers Association

Thorn

Experts:

Dr. Veronica Donoso, Media Culture & Policy Lab KU Leuven.

Dr. Ingrida Milkaite, VUB and Ghent University.

Dr. Mie Oehlenschläger, Founder of Tech and Childhood, Member of the Danish Council on Ethics, External Lecturer AI, Ethics and Public Policy.

Dr. Simone van der Hof, Leiden University.

With the support of the European Parliament Intergroup on Children's Rights Online.

The <u>Intergroup</u> gathers more than 140 members of the European Parliament and a network of over 30 child rights organisations.