

8 September 2026

Joint statement on the ‘Child safety online’ report: realising the promise of a safer digital environment for children.

Attn :

H.E. Ursula von der Leyen, President of the European Commission

Cc:

Ms. Henna Virkkunen, Executive Vice-President of the European Commission

Mr. Michael Mc Grath, European Commissioner

Dr. Maria Melchior & Prof. Dr. Jörg M. Fegert, Co-chairs of the Special Panel *on Child safety online*

Madam President,

We are writing to you as more than 140 organisations and experts working across child rights, digital rights, families and mental health, including members of the EU Coalition for Children’s Rights Online.

A year ago, in the State of the Union Address, you reiterated your commitment to child safety online and announced the launch of a panel of experts to advise you on the best approach for Europe. In July, the Co-chairs of the panel presented their report, after consulting with experts as well as children and youth representatives. We thank you, Madam President, for leading this consultation process, and we address our acknowledgements to the Co-chairs, Dr. Melchior and Prof. Dr. Fegert, for their important work and report.

As defenders of human rights and child rights, **we commend the grounding of the report in children’s rights**, as outlined in the UN Convention on the Rights of the Child (UNCRC) and its General comment No. 25 relating to the digital environment, and its strong emphasis on catering to children’s evolving capacities and ensuring their meaningful participation. As stated, “*children’s rights must underpin online child safety measures. Potential age restrictions must be in full respect of children’s rights, proportionate and balanced against children’s best interest*”.¹ These rights apply until the child turns 18, which is recognised as the age of (digital) majority.² **We welcome the tech-neutral approach** proposed by the report,³ as the recommendations go beyond social media and include other digital services that may pose risk to minors, including AI systems, video

¹ [Child safety online report](#), p.7. These principles were also reiterated in [the French Constitutional Council decision on 14 August](#), §11, 13, 16, 17.

² Child safety online report, op cit, p.17.

³ A tech neutral approach encompasses all digital services and products accessible to children, including, for instance, education technologies.

games, and video-sharing platforms. We strongly support that the **report places the responsibility on providers to prove that their services are safe and age-appropriate for all minors**. We also value the recognition of the physical and mental health risks that these services pose to minors and the recommendation to invest in civil society organisations and peer counselling.

These principles are strongly aligned with what civil society advocated for during the consultation process, notably as set out in the [joint-statement](#) addressed to you on 12 June 2026.

Madam President,

We welcome your commitment to take action on the recommendations of the report through legislative proposals that would complement the EU digital rulebook. Building on this momentum and our alignment with the key principles of the report, **we offer concrete implementation suggestions for the recommendations on safety and age-appropriate design, so that child online safety can be meaningfully realised in the EU.**

- **Set mandatory age-appropriate norms that all services and products accessible to minors must respect.** Building on the **Guidelines for the protection of minors** pursuant to article 28 of the Digital Services Act (DSA), the EU must define the minimum standards and conditions for a service or product to be deemed safe and age-appropriate by design for given age groups up to 18 years. This should include clear prohibitions or age-appropriate gating of features and functionalities known to be of high risk to minors, as well as robust default settings and positive safeguard requirements, supported by effective and privacy-preserving age assurance mechanisms.⁴ These norms should be future-proof and regularly reviewed and updated.
- **Establish risk assessment, pre-certification and auditing processes:** we strongly endorse the report's call to shift the burden of proof onto providers. In practice, we call for a mandatory, robust, transparent, and regularly updated risk assessment process for all services accessible to minors, leading to risk profiling and categorisation against EU requirements for age-appropriate design. A pre-certification regime should ensure providers demonstrate full compliance before launching, operating or updating a service accessible to minors.⁵ Independent auditing requirements should ensure ongoing oversight and impact review.
- **Institute a board of independent experts:** this new body should support the European Commission's role in defining and updating the safety by design and age-appropriate norms and the framework for risk assessment on the impact of

⁴ Parental control or consent tools should not substitute for safe design, effective regulation and platform accountability, which are necessary for the protection of all children, including the most vulnerable.

⁵ Child safety online report, p.77, 101.

design choices⁶ on minors' safety, development and well-being. It should include child rights experts as well as children and youth representatives.

- **Strengthen enforcement and compliance of existing and future regulations:** independent bodies or authorities at the national and EU levels should be tasked with evaluating providers' risk assessments, managing pre-certification, accrediting and overseeing third-party auditors, managing investigations into potential non-compliance and actioning sanctions⁷ as needed.

We trust, Madam President, that the upcoming State of the Union address and any future legislative or policy proposal will clearly reflect and advance these principles to implement restrictions on unsafe services, thereby ending the era of tech exceptionalism and systematic child exploitation. In doing so, we call on you to ensure a harmonised EU approach which precludes national initiatives that risk undermining children's shared and equal rights as well as weakening implementation and enforcement in an already challenging space. An effective approach must prioritise the enforcement of systemic market regulation and address harmful design features without offloading the burden of safety onto parents or children. It must ensure that proportionate age restrictions go hand-in-hand with robust safety measures so that digital environments both protect and empower children, by design and default.

We remain fully committed to open dialogue and stand ready to lend our technical expertise to you and your teams. We look forward to engaging closely throughout this process to ensure the upcoming instrument delivers a robust, enforceable, and future-proof framework for child online safety.

Yours respectfully,

Signatories:

Organisations:

1. 5Rights Foundation
2. ACI
3. AlgorithmWatch
4. All-Ukrainian public center "VOLUNTEER"
5. Amnesty International

⁶ Considering content, contact, conduct, contract and crosscuttings risks.

⁷ Including market access restrictions, and direct liability for harms to children.

6. ARIEL FOUNDATION INTERNATIONAL
7. Article 3
8. ASOCIACION FICE ESPAÑA
9. Asociația Solidaritate și Acțiune pentru Tineret (A.S.A.T.)
10. Associação AjudAjudar
11. Association "Children First"
12. Association "Novi put"
13. Association e-Enfance / 3018
14. Association Firefly
15. ASSOCIATION FUSO FRANCE
16. Børns Vilkår
17. Brave Phone
18. Breza Association
19. Bris, Children's Rights in Society
20. Center for Countering Digital Hate
21. Center for the Study of Organized Hate (CSOH)
22. Centre for Digital Ethics
23. Charitable organization 'Ukrainian Education Platform'
24. Check My Ads
25. Child Focus
26. Child Helpline International
27. Child Rights Information Center from Moldova (CRIC)
28. ChildFund Alliance
29. Children's Rights Alliance (Ireland)
30. Civil Liberties Union for Europe
31. COFACE Families Europe

32. CyberSafeKids
33. Defence for Children International - ECPAT - Belgium
34. Defend Democracy
35. Der Kinderschutzbund Bundesverband e.V.
36. Deutsches Kinderhilfswerk e.V./German Children's Fund
37. Digihumanism - Centre for AI & Digital Humanism
38. Digital Futures for Children
39. Don Bosco International (DBI)
40. Equitat.org
41. Eticas.ai [and] Eticas Foundation
42. Eurochild
43. Euroconsumers
44. Exea Impact - The Puig Family Foundation
45. Federation of Non-Governmental Organisations for Children (FONPC) Romania
46. Fondazione S.O.S. - il Telefono Azzurro ETS
47. FUNDACION ANAR
48. HateAid
49. Institute for Digital Citizenship Foundation (Poland)
50. INSTITUTO DE APOIO À CRIANÇA
51. International Child Development Initiatives
52. International Federation of Social Workers (Europe)
53. Internet Watch Foundation
54. ISPCC
55. JFF - Institute for Media Research and Media Education
56. Justice for Minors Association
57. Keystone Moldova

58. klicksafe
59. Lie Detectors
60. Mediavista
61. Mediawijs
62. Mental Health Europe
63. Missing Children Europe
64. National Coalition Germany - Network for the Implementation of the UN-Convention on the Rights of the Child
65. Nederlands Jeugdinstituut
66. Network for Children's Rights (Greece)
67. Netzwerk Kinderrechte Österreich - National Coalition.
68. New School of the Anthropocene
69. NGO Parents / Udruženje Roditelji
70. OFF Foundation
71. Offlimits
72. Online Safety Expert Group
73. PAJE - Plataforma de Apoio a Jovens (Ex)acolhidos
74. Pancyprrian Coordinating Committee for the Protection and Welfare of Children (PCCPWC)
75. Panoptykon Foundation
76. People vs Big Tech
77. Respect Zone
78. Safer Internet Centre Slovakia
79. Save the Children
80. Slovenian Association of Friends of Youth
81. Sociedad Española de Neurología
82. Society "Our children" Opatija
83. SOS Children's Villages

84. Stiftung Digitale Chancen | Digital Opportunities Foundation (Germany)
85. Strateon Social Impact Consulting
86. Terre des Hommes Netherlands
87. The Alliance of Active NGOs in the field of Child and Family Social Protection (APSCF)
88. The Central Union for Child Welfare (Finland)
89. The Smile of the Child
90. To Zero
91. Vlaamse Jeugdraad (Flemish Youth Council)
92. WHAT TO FIX
93. YYOUTH
94. Zemberek Teknoloji Sanat Ve Öğrenme Derneği (Zemberek Technology Arts and Learning Association)

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