



Attn: Christel Schaldemose, Arba Kokalari, Dita Charanzová, Alexandra Geese, Alessandra Basso, Adam Bielan, Martin Schirdewan, Mikuláš Peksa, Jadwiga Wiśniewska, Henna Virkkunen, Roman Haider, Sabine Verheyen, Geoffroy Didier, Patrick Breyer - DSA Rapporteurs and Shadow Rapporteurs

C/c: Caterina Chinnici, David Lega, Hilde Vautmans– Co-Chairs of the Child Rights Intergroup; Manfred Weber, Iratxe García Pérez, Stéphane Séjourné; Ska Keller, Philippe Lamberts, Raffaele Fitto, Ryszard Legutko – EP Political Group Presidents

Subject: Children's rights in the DSA

02 December 2021

Honourable MEPs,

Children, in the digital world as offline, require, merit and have the legal right to specific protections to ensure their safety and wellbeing.

We – representing more than 2000 children's rights organisations and parents' associations, and speaking on behalf of some 200 million children and parents in the EU – are happy to see that a requirement for companies to "adapt their design features to ensure a high level of privacy, safety and security by design for minors" (Art 15a) and a ban on the use of the personal data of minors for commercial purposes (Art 24) have been included in your latest Compromise Amendments to the Digital Services Act (DSA), backed up by industry Standards (Art 34).

We urge you to ensure these provisions all remain as part of your final agreement, and that the Regulation be explicitly underpinned by EU and international law on the rights of the child.

To this end we request that you recognise (e.g. in Recital 3) that children have specific rights enshrined in Article 24 of the Charter of Fundamental Rights of the European Union and in the United Nations Convention on the Rights of the Child. As such, the best interests of the child should be a primary consideration in all matters affecting them. UNCRC General comment No. 25 on children's rights in relation to the digital environment formally sets out how these rights apply to the digital world.

Thanking you for your support, we are sincerely yours,

Baroness Beeban Kidron
Chair, 5Rights Foundation

Victor Petuya
President, European Parents' Association

Jana Hainsworth,
Secretary General, Eurochild

Maud de Boer Buquicchio
President, Missing Children Europe

Guillaume Landry
Executive Director, ECPAT International