

23 February 2026

Subject: Children’s Rights in the Digital Omnibus on Artificial Intelligence

Dear Members of the European Parliament’s IMCO and LIBE Committees,

We, representing over 80 children’s rights, families and mental health organisations and experts, are writing to urge you to stand firm in your commitment to protecting children in the digital environment and ensuring that their rights and needs are not forgotten in the final compromise amendments to your report on the Digital Omnibus on AI.

Artificial Intelligence (AI) systems are increasingly integrated into products and services affecting children. Besides being direct users – twice as much as adults¹ – children are also indirectly impacted by AI driven decisions, for example in schools, law enforcement and healthcare, and by some AI tools that might exploit them.

The [European Commission’s proposal](#) challenges some of the key protections in the AI Act, notably regarding high-risk AI systems and transparency requirements, as well as children’s rights to privacy and data protection. The proposal also fails to protect children from risks that increase exponentially such as nudifying AI systems and functionalities. Children and their rights² must be safeguarded and protected through the Digital Omnibus proposals.

We urge you in your scrutiny and amendments of the Digital Omnibus on AI to:

- 1. Prevent the processing of children’s data for ‘bias detection and mitigation’, and more generally, for the training of AI systems and models³.** Children are entitled to specific protections⁴ from data-driven practices that undermine their rights and expose them to a wide range of risks

¹ OFCOM, (2024), *Children’s Media Literacy Report*.

² See *United Nation Convention of the Right of the Child, General Comment No 25*.

³ According to the proposed GDPR Omnibus Amendment (new Art.88c GDPR), the processing of personal data for the purpose of development and operation of an AI system or AI model may be pursued for legitimate interests under Art.6(1) GDPR.

⁴ GDPR recital 38: ‘*Children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data. Such specific protection should, in particular, apply to the use of personal data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data with regard to children when using services offered directly to a child. GDPR Article 8 also requires verified parental consent for the processing of the data of children under the age of consent (13-16).*

in the digital environment. **These specific protections must also apply to AI. We ask you to explicitly exclude the use of children's data in the new Article 4a.**

- 2. Maintain transparency requirements and registration obligations for AI systems likely to interact with or impact children⁵.** The removal of the registration obligation would undermine transparency safeguards and could result in deployers unknowingly using high-risk AI systems that may pose significant risks to children, in domains as important as education, healthcare, justice or law enforcement. **A line must be drawn on children, to ensure the highest degree of transparency and that all AI systems that impact them have been assessed against their rights.**

- 3. Explicitly recognise nudifying AI systems and functionalities as a prohibited practice.** Given the scale, permanence and severity of harm linked to AI-enabled child sexual abuse and exploitation, a clear prohibition of “nudifying tools” in the AI Act is both proportionate and necessary. **Beyond nudifying apps, providers of general-purpose AI that implement effective measures must be mandated to prevent the generation of sexualised or nudified content, with criminal penalties for non-compliance⁶.**

Any delay to high-risk AI systems obligations risks leaving children exposed for longer in precisely the sectors where AI is most critical for children's rights and wellbeing. With regards to the delays of implementation for high-risk AI systems and transparency obligations⁷, we call on you to maintain the current timeline for any systems likely to interact with or impact children.

We are counting on you to re-establish the primacy of children's rights, and lay the groundwork for a better digital future for all.

For the European Parliament to respect its commitment and deliver on children's rights, make children the exception.

Sincerely yours,

⁵ Digital Omnibus on AI, Article 1(6) modifying Article 6(4) AI Act, Ar. 1(14) deleting Art. 49(2) AI Act, Article 1(32) deleting Section B in Annex VIII AIA).

⁶ Amend Article 5(1), 53 and 99(3) AI Act in line with the [Global Call to Ban Nudifying Tools and Protect Children from Exploitation](#).

⁷ Amendment to Article 111 AI Act introducing a new six-month transitional period for providers of AI systems to label or watermark AI generated content.

Organisations

1. 5Rights Foundation
2. ADDHG - Guimarães Human Rights Defense Association
3. Alliance of Active NGOs in the Field of Child and Family Social Protection (APSCF)
4. Ariel Foundation International
5. ASAM (Association for Social Development and Aid Mobilization)
6. ASEAF
7. Associazione Lea onlusa (Italy)
8. Association Children First (Croatia)
9. Association Novi put
10. Austrian Network for Children's Rights
11. Bertelsmann Stiftung
12. Børns Vilkår
13. Cedar Foundation
14. Central Union for Child Welfare (Finland)
15. Center for Child Rights (Serbia)
16. Charity Fund "KIDS OF UKRAINE"
17. ChildFund Alliance
18. Child Helpline International
19. Child Rights Information Center in Moldova (CRIC)
20. Children and Youth Support Organisation (Serbia)
21. CNAPE
22. Coalition of NGOs for Child protection in Kosovo
23. COFACE Families Europe
24. CONCORDIA Social Projects
25. CRCA-ECPAT Albania
26. Czepczynksi Family Foundation
27. Don Bosco International (DBI)
28. Early Childhood Development Association of Malta (ECDAM)
29. Ergo.AcademyCoalition for Family Foster Care, Poland
30. Estonian Union for Child Welfare
31. Eurochild
32. Federation of Non-Governmental Organizations for Children (Romania)
33. FEDAIA
34. FICE Spain
35. FICE Croatia
36. First Children's Embassy in the World MEGJASHI (Macedonia)
37. Fondazione Telefono Azzurro
38. Friends of Children of Serbia
39. German Children's Fund/Deutsches Kinderhilfswerk e.V. (Germany)
40. Haki Za Wanatsa - UNCRC Collective for French Overseas Territories
41. Hope and Homes for Children - Romania
42. ICAM NETWORK APS
43. ICF "Ukrainian Foundation for Public Health"
44. International Charity Partnership for Every Child
45. Instituto de Apoio à Criança

46. Irish Society for the Prevention of Cruelty to Children (ISPCC)
47. Joint Council for Child Issues in Denmark
48. Kindermittle e.V.
49. Latvian Child Welfare Network
50. Luxembourg's Ombudsman for Children and Adolescents (OKAJU)?
51. Malta Foundation for the Wellbeing of Society
52. Mannerheim League for Child Welfare, Finland
53. Mental Health Europe
54. Missing Children Europe
55. Moje mjesto pod suncem (My Place Under the Sun), Croatia
56. NestingPlay
57. Network for Children's Rights (Greece)
58. Ombudsman for Children, Croatia
59. Pere Closa Private Foundation
60. Roots Research Center
61. Savez društava "Naša djeca" Hrvatske (Croatia)
62. Slovenian Association of Friends of Youth
63. Society Our children Opatija
64. Stiftung Digitale Chancen / Digital Opportunities Foundation (Germany)
65. Terre des Hommes Netherlands
66. The Albanian National Child Helpline
67. The Smile of the Child (Greece)
68. Thorn
69. Udruga Breza/Breza Association Croatia
70. YYOUTH Norway

Individuals:

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