Pelastakaa Lapset

Feedback for proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulations (EU) 2024/1689 and (EU) 2018/1139 as regards the simplification of the implementation of harmonised rules on artificial intelligence (Digital Omnibus on AI)

Save the Children Finland (SCF) states, that some streamlining of the "AI Act" is justified, since the Act is of a considerable size, possibly resulting in its slow implementation. But the progress of streamlining should not weaken fundamental rights, and where possible, it should consider strengthening safeguards concerning child rights.

Strong streamlining of the regulation means that savings can be made only from cutting down mandatory reporting and legislative oversight. That raises big concerns on effects for the realization of child rights.

SCF is deeply concerned that the "AI Act" already has very few positive connections to the realization of child rights, and there is a great risk that the Omnibus will diminish them further.

An important issue to consider is the right of children for protection. Artificial intelligence systems enable violence against children in a completely new and extremely harmful way. Internationally, SCF is already seeing an explosive growth in AI-generated child sexual abuse material.

Children's rights to privacy and data protection should be safeguarded in all circumstances. As an example, SCF sees it important to maintain the registration obligations for high-risk AI systems for systems likely to interact with or impact children, including educational settings.

SCF welcomes EDPB and EDPS joint opinion that EDPB should have the status of observer at the European Artificial Intelligence Board. SCF also sees that it is important to introduce requirements for active cooperation between the AI Office and authorities involved in the application of AI Act for the supervision of AI systems based on a general-purpose AI model, where the provider of the model is also the provider of the system.

Additional information:

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