



WG1-WS2 – PROTECTION OF MINORS

September 2025

CEM, CMS, ERC

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EXECUTIVE SUMMARY

This report is based on an in-depth analysis of how Articles 6a and 28b of the Audiovisual Media Services Directive (AVMSD) are applied in Member States. It highlights patterns of convergence and divergence in systems for protecting minors.

While there is a common European core of categories and age ratings, differences remain in terms of legal instruments, descriptors used, and degrees of regulatory intervention. At the same time, natural differences arising from linguistic diversity, resource availability and varying levels of platform transparency create practical cooperation challenges that can benefit from shared solutions.

Building on this analysis, the report proposes a series of practical, gradual and non-binding solutions, which are possible options to be developed within the EBMS framework, based on cooperation between regulators.

These options are organised around several complementary axes. These include creating common reference tools (such as a European repository), developing shared practical guidelines (such as a playbook), promoting flexible solutions and cross-border cooperation mechanisms, and strengthening platform transparency and accountability.

These options are designed as voluntary cooperation instruments. Any future consideration of their legal status would remain a matter for the EU co-legislators, strictly within the limits of the AVMSD's minimum harmonisation framework and subject to political decision.

The proposed approach is based on two levels. Firstly, it defines a shared European minimum basis to promote greater consistency and interoperability between national systems. Secondly, it promotes flexible solutions and voluntary cooperation mechanisms to allow this common basis to adapt to different cultural, legal and technological contexts.

The report's guiding principle is to strengthen the protection of minors by fostering coherence and mutual understanding between national systems through voluntary and practical European instruments developed in a spirit of cooperation and shared practices, which could inform future policy discussions.

CONTEXT AND OBJECTIVES

The protection of minors remains a cornerstone of European audiovisual policy. Through the AVMSD, Member States are required to ensure that content which may impair the physical, mental or moral development of minors is subject to appropriate restrictions, while allowing national authorities to adapt measures to their evolving digital environments and cultural contexts.

For the purposes of this report, a distinction is made between (i) content which may impair the physical, mental or moral development of minors (Articles 6a and 28b(1)(a) AVMSD) and (ii) illegal content applicable to the general public, including incitement to violence or hatred (Article 28b(1)(b) AVMSD). This report focuses on the first category, in line with the scope of Article 6a.

The 2018 revision of the AVMSD expanded the Directive's scope to include on-demand services and video-sharing platforms, reflecting how minors increasingly access content through online and user-generated environments. It also strengthened obligations for parental-control tools, age-verification systems and transparent labelling, while emphasising that providers, regulators and co-regulatory bodies share responsibility for maintaining high protection standards.

In 2024, ERGA's SG1 evaluated the measures adopted by NRAs regarding the protection of minors. The overall conclusion was that there was a need to establish and refine criteria for classifying content that may impair the physical, mental or moral development of minors.

Against this background, and in accordance with the objectives set out in the ToR, Workgroup 1, Workstream 2 (WG1-WS2) centred its efforts on identifying the indicators and descriptors employed by NRAs to categorise such content and on evaluating whether these could form a common reference framework at European level. Taking into account technological developments and the work undertaken by ERGA in 2017, the group further explored whether these common indicators could support tailor-made classifications that respect each country's cultural standards.

The work examines how regulatory frameworks accommodate emerging technologies such as artificial intelligence, the challenges posed by cross-border services, and the cultural diversity in classification approaches. By mapping national experiences, the report presents areas of convergence and divergence, supports mutual learning, and provides evidence-based insights that may inform future policy discussions at both the Media Board and EU level.

METHODOLOGY

The research underpinning this report combined qualitative and quantitative methods to capture both the legal frameworks and practical implementation of measures to protect minors across the European Union. Three complementary components were applied: desk research, targeted interviews, and a cross-national survey.

Desk research established the analytical foundation by reviewing national legislation, regulatory guidelines, and policy literature on content classification and minors' protection. This stage provided a comparative baseline of definitions, statutory obligations, and policy debates concerning content which may impair the physical, mental or moral development of minors.

Targeted interviews were then conducted with a selection of national regulatory authorities (NRAs) and co-regulatory bodies, chosen to reflect geographical balance and institutional diversity. These interviews offered qualitative insight into how content harmful to the development minors is defined and classified in practice, the indicators and descriptors employed, and the adoption of emerging tools—including AI-based systems—to support monitoring and enforcement. They also highlighted shared challenges and innovative practices that could inform wider cooperation.

Finally, a survey was distributed to all members of the Media Board. Conducted in mid-2025, it gathered 26 responses representing 24 Member States. The survey collected systematic and comparable data on national classification systems, implementation challenges, and perspectives for convergence. It also explored how NRAs interpret “potentially harmful content”, apply technical measures such as parental controls and age verification, and address both traditional risks (violence, pornography, hate speech) and emerging harms (cyberbullying, online challenges, manipulative or misleading content).

The multi-layered approach enabled both depth and comparability. The combination of documentary review, direct interviews, and a quantitative survey allowed the group to identify common patterns, regulatory divergences, and areas where shared guidance or cooperation under the EBMS framework could add value.

STATE OF PLAY

The broadening of the AVMSD scope entailed the emergence of new risks associated with the platforms now subject to its application, particularly video-sharing platforms (VSPs). To address these risks, the Directive considers it necessary to empower viewers — including parents and minors — to make informed viewing choices. Media service providers are therefore required to provide sufficient information about content that may impair the physical, mental or moral development of minors, using tools such as content descriptors, acoustic warnings, visual symbols or equivalent means. In most cases these criteria are established in national legislation. However, in some Member States they take the form of regulatory or co-regulatory guidelines issued by the competent authority, providing technical orientation rather than binding legal provisions.

The Directive introduces proportionate measures that relate not to prior editorial control but to content organisation, including reporting mechanisms, age verification tools and parental control measures. In line with Article 4 of the AVMSD, it establishes a system of minimum harmonisation, explicitly allowing Member States to adopt different national approaches to the protection of minors according to their legal and cultural contexts.

Today, the protection of minors in Europe relies on a legal framework structured around three complementary instruments:

- (i) the Audiovisual Media Services Directive (AVMSD), which defines the substantive obligations for protection of minors;
- (ii) the Digital Services Act (DSA), which introduces transparency duties, independent auditing and systemic risk mitigation obligations applicable to online platforms, including VSPs; and

- (iii) the European Media Freedom Act (EMFA), which establishes governance mechanisms and cooperation structures between national regulatory authorities.

Although this report falls within the scope of the AVMSD, it acknowledges that the objectives of the European regulatory framework – as reflected in the AVMSD (protection obligations), the DSA (systemic risk mitigation) and the EMFA (coordinated governance) – are convergent in the field of the protection of minors. This regulatory alignment strengthens the rationale for developing practical convergence instruments and cooperation mechanisms between national authorities to ensure coherent and complementary application of the applicable regimes.

Taking this background into account, the report analyses the situation in each Member State with regard to the transposition of the AVMSD concerning the definition of content that may impair the physical, mental or moral development of minors, the criteria and methods used to assess and classify content, the tools and methods employed by the NRAs for content classification, the use and potential of tailor-made solutions, and the tools and resources developed by the NRAs to support content classification, as well as the practical challenges NRAs face in this area.

SECTION A – GENERAL FRAMEWORK AND IMPLEMENTATION

This section examines how Member States have transposed Articles 6a and 28b(1)(a) of the AVMSD into national law, focusing on the definitions of content which may impair the development of minors, the legal instruments adopted, and the corresponding protective measures. It also considers the existence and nature of guidelines issued by NRAs or other relevant bodies to assist in the identification of such content.

1. Definitions of Content which may impair the physical, mental or moral development of minors – Transposition of Articles 6a and 28b AVMSD

In the survey, the NRAs' responses reveal two main approaches: **10 countries**¹ have incorporated into their legal framework **additional definitions** of harmful content which may impair the physical, mental or moral development of minors, beyond gratuitous violence and pornography and **13 countries**² rely solely on the Directive's wording without adding national criteria.

Based on the answers given, some countries have included additional definitions in their **primary legislation**:

- The **Polish Broadcasting Act** identifies categories of content that are prohibited or subject to classification, including pornography, unjustified violence, and vulgar or strong language.
- In **Lithuania**, the Law on Protection of Minors defines a wide range of categories and indicators that are considered to have a detrimental effect on minors.
- In **Ireland**, the **Broadcasting Act 2009** (as amended) only defines harmful content for minors in the **online context**, to cover content that constitutes cyberbullying,

¹ Bulgaria, Eslovenia, Estonia, Hungary, Ireland, Italy, Lithuania, Poland, Romania and Slovakia.

² Austria, Belgium, Cyprus, Czech Republic, Denmark, France, Germany, Latvia, Luxembourg, Malta, Portugal, the Netherlands and Spain.

content that promotes eating disorders or promotes self-harm or suicide, if such content meets the “risk test”.

- In Spain, the provisions of Article 6a AVMSD have been transposed through the Spanish Law 13/2022, of 7 July, General de Comunicación Audiovisual. Under this framework, audiovisual media service providers are required to classify their content according to its potential impact on minors. The CNMC supervises compliance through a co-regulatory system based on technical orientation criteria, which complement the national legal framework. These guidelines support providers in implementing the statutory obligations while allowing flexibility to adapt to different content formats and distribution environments.

In some cases, the definition of content harmful to minors is set out not in the primary legislation but in **secondary legal** acts, ensuring the implementation of Article 6a through detailed regulatory provisions:

- In **Slovenia** a sub-statutory act adopted by **AKOS** details the content, which is applicable only to audiovisual media services (AVMS) and not to video-sharing platforms (VSPs).
- In **Romania**, the **Regulatory Code of the Audiovisual Content** (Decision no. 573/2025, adopted by **CNA**) defines harmful content broadly. It specifically targets any material that could cause fear, intimidation, horror, psychological terror, or other intense negative emotional states.
- In **Portugal** the densification and application of criteria is set out in an ERC Resolution (ERC/2016/249 OUT-TV), which is currently under revision.

2. Indicators and descriptors beyond «gratuitous violence» and «pornography» present in national legislation

15 NRAs³ stated having legislation that includes specific indicators and descriptors for harmful content beyond «gratuitous violence» and «pornography».

Here are some examples of NRAs who reported having **detailed lists of indicators** that serve as the basis for content classification:

- **Lithuania** considers a list of **21 types** of harmful content covering a wide range of issues. These include information promoting aggression, encouraging property damage, depicting dead or injured people, and content of an erotic nature. The list also covers less common categories, such as content that encourages bad hygiene or depicts staged paranormal phenomena.
- In **Slovakia**, a secondary regulation introduces a set of descriptors for different types of content, including violence, discrimination, fear, addictions, coarse language, sexual content, and nudity. Each is related to specific age categories.
- In **Bulgaria**, the Code of Conduct lists indicators and descriptors for harmful content such as depictions of violence, fear, sexual content or nudity, risky or antisocial behaviour, use of alcohol, drugs, or tobacco, discrimination, and

³ Belgium – Flemish Community, Bulgaria, Czech Republic, Estonia, France, Germany, Ireland, Italy, Lithuania, Malta, Poland, Romania, Slovakia, Slovenia and Spain.

inappropriate language, in addition, article 37(4) of the Film Industry Act specifies further descriptors.

- The Estonian **Media Services Act and the Broadcasting Union Guidelines** identify specific subject matter that triggers concern or regulation: gratuitous violence (like torture or bloodshed), content that instills intense fear or horror, sexual acts or themes, strong or offensive swearing, and the use of controlled substances (drugs, alcohol, or tobacco).
- In **Romania**, the Regulatory Code of the Audiovisual Content includes indicators such as: explicit language, psychological violence, vulgar/obscene content, discrimination, substance abuse, depiction of fear or horror-inducing imagery, and any audiovisual production that may be morally or emotionally disturbing to minors.
- In Spain, the CNMC applies a co-regulatory system based on technical guidelines that provide orientation for content classification. These guidelines include indicative criteria and examples but do not have the force of law. Classification is carried out by audiovisual service providers under the CNMC's supervisory powers, ensuring consistency and proportionality. The forthcoming update of the CNMC's guiding resolution will broaden its scope to cover all types of audiovisual providers established in Spain.

Based on the answers given to the questionnaire, **8 NRAs** relate content indicators to age categories or visual and acoustic signs or different types of labelling.

- In Italy, **AGCOM** adopted protective measures like the use of signs indicating that films are classified as prohibited for children under 14 years of age.
- The regulation enacted by **Arcom**, in France, defines five categories of content, ranging from programmes suitable for all audiences to content not recommended for children under 18, based on criteria such as physical or psychological violence, erotic nature and pornography.
- In **Germany** programmes that are potentially harmful to children under 16 must be announced with acoustic signals or visually labelled as unsuitable for this age group.
- **Czech Republic** prohibits the broadcasting of content that could harm the development of minors, unless it is clearly identified by visual or acoustic means and broadcast at times when minors are less likely to see it.
- **Flemish** legislation uses a series of content classifications, in order of severity, including violence, fear, sex, substance abuse, strong language and negative images. These indicators are used to assign age ratings.
- In **Slovakia**, the defined categories (violence, discrimination, fear, addiction, coarse language, sexual content and nudity) are related to one or more age categories.
- **KRRiT** regulations, in Poland, specify content descriptors used in age classification, such as depictions of drug or alcohol use, coarse or offensive language and fear-inducing or disturbing scenes.
- **Malta** defines both age categories and content descriptors as violence, fear, sex, discrimination, alcohol and drug abuse, inappropriate language.

3. Guidelines on Criteria for Identifying Content Which May Impair Minors' Development

The questionnaire also sought to find out whether NRAs or other national bodies have issued guidelines specifying criteria for identifying content which may impair the physical, mental or moral development of minors, and whether these are statutory, co-regulatory, or self-regulatory.

When asked whether their regulator or other national body had issued guidelines specifying criteria for identifying content that could be harmful to minors, **16 NRAs**⁴ answered affirmatively. **10 NRAs**⁵ have not issued any guidelines.

These guidelines stem from a variety of **legal and collaborative frameworks, including statutory provisions, co-regulation, and self-regulation.**

5 NRAs rely on **statutory or binding regulatory rules:**

- In **Ireland**, the **Coimisiún na Meán** is empowered to introduce media service codes and rules that are binding on broadcasters and on-demand providers. The legislation also allows for the introduction of online safety codes for video-sharing platforms. The Online Safety Code sets out the requirements of platforms and is aided by guidance which further addresses the identification of content that may impair the development of minors.
- In **Romania**, **CNA** adopted binding statutory provisions through its **Regulatory Code**. This code provides detailed rules for identifying harmful content and applies to linear services, on-demand services, and video-sharing platforms.
- In **Hungary**, **NMHH** issued the *Classification Guidelines*, upon mandatory authorisation by Act CLXXV of 2010 on Media Services and on the Mass Media.
- In **Germany**, the Youth Protection Guidelines – *JuSchRiL* – specify the legal requirements of the State Treaty on the Protection of Minors in the Media. The *Kommission für Jugendmedienschutz*⁶ (KJM) issued specific criteria for supervision in broadcasting and telemedia.
- In **Poland**, the National Broadcasting Council (KRRiT) operates under the Polish Broadcasting Act, which empowers it to adopt its own regulations, published in the Journal of Laws. These regulations lay down detailed rules for the identification and classification of harmful content, including age-based categories and content descriptors, and apply to linear, on-demand, and video-sharing services.

In addition, **3 NRAs** reply having developed guidelines through **co-regulatory models.**

- The **Belgium–Flemish system** “GoedGezien” is based on a manual developed by the Department of Culture, Youth, and Media, in collaboration with independent experts and representatives of broadcasters and service providers.
- In **Spain**, the **CNMC** applies a co-regulatory model based on guiding criteria for rating audiovisual content. This model, established through a Resolution and developed in cooperation with industry stakeholders, is subject to continuous evolution to reflect technological and market developments. The forthcoming update of the national code of conduct will further extend its scope to all types of

⁴ Austria, Belgium (CSA), Belgium (VRM), Bulgaria, Denmark, Estonia, Germany, Hungary, Ireland, Poland, Portugal, Romania, Slovakia, Slovenia, Netherlands and Spain.

⁵ Belgium (MEDIENRAT), Cyprus, Czech Republic, France, Italy, Sweden, Latvia, Lithuania, Luxembourg and Malta.

⁶ Commission for the Protection of Minors in the Media.

audiovisual providers established in Spain, reinforcing consistency and stakeholder participation.

- **CEM, in Bulgaria**, issued binding guidelines in the form of a Code of Conduct, developed through a co-regulatory process involving audiovisual media service providers. The measures derive from the Radio and Television Act legal framework and are mandatory for all audiovisual media.

4 NRAs stated that they present a self-regulatory model:

- **NICAM** is the self-regulatory body responsible for content classification, in the **Netherlands**.
- In **Austria**, the guidelines which set uniform standards for the protection of minors in the context of audiovisual content were issued by the self-regulatory body "*Association for the self-regulation of audiovisual media content for the protection of minors*".
- The Estonian Broadcasting Union has adopted a self-regulatory code specifying content labelling practices, in **Estonia**.
- In **Italy**, the Code on Media and Minors is currently under revision.

3 NRAs also rely on existing regulatory decisions. **CSA (Belgium French community)** have guidelines that summarize the case law that stems from the main regulatory body of the CSA, the Authorisation and Control Body (CAC). In **Slovakia** case law and regulatory decisions inform how these descriptors are applied in practice. In **Portugal**, **ERC** rely on a deliberation that is currently being revised following updates to the law.

CMS, in Slovakia, did not issue additional guidelines because the descriptors are defined in their by-law.

4. Application of measures to protect minors from harmful content under Article 6a (1) AVMSD

Convergence on multilayered protection measures:

As can be seen in the table below (Table 1), all responding countries employ a **multi-layered approach** that integrates legal, scheduling, and technical measures, reflecting a comprehensive strategy to protect minors

Most countries apply specific time restrictions, known as watersheds, to limit the broadcasting of harmful content to minors, generally ranging from 9 p.m to midnight for adult-only content.

Others implement technical solutions to control access to content like pin codes, encryption, parental controls and age verification mechanisms, particularly for on-demand services and video-sharing platforms.

Some NRAs also reported other technical measures such as content labelling (age labels based on national age ratings, visual symbols and audio warnings) to ensure that minors are not exposed to content unsuitable for their particular age group.

Time ban for content restriction varies across NRAs:

Watershed hours and time restrictions vary across NRAs, with early evening limitations typically protecting younger audiences. Explicit content is allowed usually after 10 p.m., until 6 am.

Age verification tools and parental control measures:

Age verification and parental control measures are increasingly standard for on-demand services and video-sharing platforms, with PINs, access codes, and encryption commonly used, and age-assurance tools mandatory in some jurisdictions.

Enforcement of formal age classification systems for content vary by country relating content descriptors to protective measures.

Growing regulatory measures for VSP:

Video-sharing platforms face growing regulatory obligations, including content rating responsibilities, user flagging/reporting tools, filtering and safe spaces, and consultation processes for influencer codes.

Different enforcement mechanisms per country:

Enforcement mechanisms differ, ranging from direct monitoring and sanctions to co-regulatory oversight and case-by-case assessments allowing content reclassification.

The strictest controls, combining technical measures and scheduling restrictions, are reserved for pornography and extreme violence. Such content is generally encrypted, PIN-protected, and isolated in restricted sections.

Regulators' role on enforcement:

While the methods vary, the regulator's role is consistently described as being one of monitoring, enforcement and, sometimes, oversight. In some cases, the classification is not done by the regulator but by the content distributors, with the regulator overseeing the process. In other countries the NRA reviews the effectiveness of the self-regulation system. Regulators also have the power to impose sanctions for non-compliance.

Table 1 - Measures applied under Article 6a (1) AVMSD

NRA	Watershed/Time restrictions	Age categories/verification	Technical measures or other
AGCOM (IT)	7 - 11 pm	T (All), - 6, -10, -14, -18	Acoustic and visual warnings
AKOS (SI)	Yes. Not specified	Parental guidance, 12+, 15+, 18+, Adult content	Pin code or equivalent; acoustic and visual warnings (AVMS providers)
ALIA (LU)	Time restriction for children: Under 12, between 6 am and 8 pm; Under 16, between 6 a.m. and 10 pm; Under 18 (adult content), between 24:00 and 5 am.	All, -10, -12, -16, -18	Encryption and access codes
AnmMH (AT)	Yes. Not specified	0, 6, 12, 16, 18	-
Arcom (FR)	Time restrictions for linear services ⁷	All, -10, -12, -16, -18	Parental pin code Text-based warnings
BA (MT)	Yes. Not specified	U, PG, 12A, 12, 15, 18	Access measures for VODs
CEM (BG)	Watershed hours: children under 14 — between 21:00 and 06:00; children under 16 — between 22:00 and 06:00; children under 18 — between 23:00 and 06:00.	A (children), B (none), C (12), C+ (14), D/D+ (16), X (18)	Visual symbols are displayed throughout the programme. An acoustic or acoustic-optical warning is given at the start and after breaks (about 60 seconds). High-risk content is placed behind encryption or conditional access. For on-demand services, age-verification or equivalent access controls are applied.
CMS (SK)	Watersheds: after 8 pm for content not suitable for children under 15; after 10 p.m. for content not suitable for children under 18	All, 7, 12, 15, 18, Suitable for children under 12	Uniform Labeling System (JSO)
CNA (RO)	Time restrictions for linear content (adult content only late at night)	AP (<12 with parental guidance), 12, 15, 18, 18+	Parental control tools; access restriction systems

⁷ Children under 12: not before 10 pm; or, exceptionally (within the limits of 16 evenings per year), allowed at 8 pm. On movie channels, they can be broadcast from 8.30 pm on Wednesday and at any time the other days; Under 16: for these programs, the watershed is 10.30 pm on general channels and 8.30 p.m on movie channels; Under 18: those contents are allowed between 24:00 and 5 am, on certain services only. For on-demand services: Children under 16: those programs are allowed between 10:30 pm and 5 am when they are free; Under 18: These contents are exclusively marketed for paid subscription and pay-per-view; they are isolated in a private/reserved space.

CNMC (ES)	Time restrictions for harmful content	7+, 12+, 16+, 18+	Co-regulatory model ⁸ ;
Coimisiún na Meán (IE)	Watershed after 9 pm	Unspecified	Prior content warnings, parental controls, restricted modes, PIN access and age assurance tools.
CPTRA (EE)	Time restrictions (6 am - 10 pm)	12+, 18+	Age-based access control (PIN codes or other technical solutions); Content labelling (age labels, visual and audio warnings)
CRTA (CY)	Yes. Not specified	K (All), 12, 15, 18, A (erotic)	Content filtering system; access codes
CSA (BE - French)	Time restrictions (6 am - 10 pm)	- 10, - 12, - 16, - 18 pictograms	Age-based access control (Parental control functions: PIN code); Content labelling (age labels)
CVDM (NL)	Time restrictions limited to linear services	All, 6, 9, 12, 14, 16, 18	Kijkwijzer
DLM (DE)	Yes. Not specified	6, +12, +16, +18	Other technical measures; Youth protection programs
ERC (PT)	ERC (PT) Time restrictions between 6 am to 10.30 pm	T (All), 10AP, 12AP, 16; AP (Parental guidance)	Acoustic and visual warnings
KRRiT (PL)	Time restrictions between 6 am to 11 pm	All, 7+, 12+, 16+, 18+	Age-based visual symbols and content descriptors
MEDIENRAT (BE-German)	⁹ -	-	-
MEMY (SE)	No harmful content before 9 pm	Unspecified	Parental control functions; Providers of VOD need to implement technical measures; VSP must restrict realistic violence and pornography
NEPLP (LV)	Harmful content not allowed between 7 pm to 10 pm	Film classification (multi-level)	-
NMHH (HU)	Time of broadcast for media services	All, -6, -12, -16, -1810	-
RRTV (CZ)	Time restriction between 6 am and 10 pm, for linear broadcasters ¹¹	-	-

⁸ Combining statutory obligations (Ley 13/2022) with CNMC guidance; classification based on editorial criteria and continuous evolution of orientation guidelines.

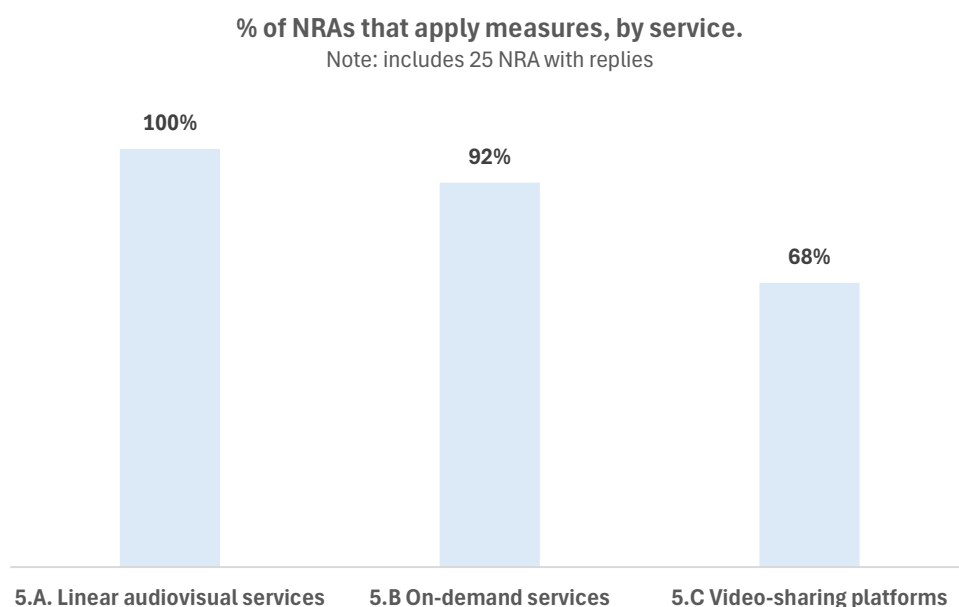
⁹ Currently, the application of these measures is being reviewed by the Medienrat. New guidelines to assess the measures are being prepared.

¹⁰ And programs which may impair the physical, mental or moral development of minors (pornography or extreme and/or scenes of gratuitous violence).

¹¹ RRTV encourages consistent visual cues and descriptive notices as good practice. These serve as soft regulation.

RTCL (LT)	"S" 11 p.m. to 6 am; "N-14" 9 pm to 6 am	N-7, N-14, S (all minors)	Age verification, parental controls, and filtering tools (for online content)
SLKS (DK)	-	7+, 11+, 15+ (for VOD and cinema)	-
VRM (BE-Flemish)	VRM (BE - Flemish) 12+ after 8 pm; 16+ after 10 pm; 18+ after 11 pm	All, 6,10,12,16	Parental supervision; Encryption for programs with pornographic or unnecessarily violent images; provision of information to viewers through a system that describes the potentially harmful nature of programs.

5. Services to which measures apply under article 6a (1) AVMSD



5.C Video-sharing platforms	
YES	NO
AGCOM, AnmMH, CEM, CNA, Coimisiún na Meán, CNMC, CPTRA, CRTA, DLM, ERC, KRiIT, MEDIENRAT, MEMY, NMHH, RTCL, VRM.	AKOS, ALIA, Arcom, BA, CMS, CVDM, NEPLP, SLKS.

Measures considered under article 6a (1) AVMSD to protect minors from harmful content are generally applied by all NRAs to linear audiovisual services, on demand services (with the exception of Latvia).

Although 16 NRAs said to apply such measures to video-sharing platforms, still 8 of the respondents said they do not cover them.

ALIA measures for VOD services, in Luxembourg, include specific provisions like a required parental control system and distinct marketing for Category V services.

In Slovakia, **CMS** system for indicators and descriptors does not apply to VSPs, with the exception of vloggers who fall under the AVMS definition.

NEPLP, in Latvia, does not apply measures to VSPs or VOD services because its regulations are based on the time of broadcast.

4 NRAs have replied that they apply measures to other services, namely in Germany **DLM** mentioned that they also apply measures for **Telemedia**. The Danish media regulator, **SLKS** also mentioned that the system of JSO is also applied to other ways of distribution, like cinemas, DVDs and games. **VRM**, in Belgium, pointed out that, according to Article 180, § 6, of the Media Act, providers of **bundle media services** also have to take ‘technical measures’.

SECTION B: CLASSIFICATION INDICATORS AND DESCRIPTORS

This section aims to understand the criteria and methods used by NRAs to assess and classify content that may be harmful to minors. It explores the use of age ratings, content descriptors, and the practical implementation of classification systems.

1. Assessment of content to determine whether it may be harmful to minors:

When assessing content (text, images, video) to determine whether it may be harmful to minors, four key approaches were considered, namely the use of predefined indicators established in law, external guidelines, overall case-by-case assessment based on doctrine or case law and consultation with independent experts or child development experts.

Case-by-case assessment is the dominant approach across 22 NRAs¹², followed by legal indicators (15 NRAs)¹³, external guidelines (13 NRAs)¹⁴ and expert consultation (10 NRAs)¹⁵.

All four methods are used by five NRAs. Countries like Slovenia (only legal indicators), Sweden (only case-by-case), Latvia (only expert consultation) and Ireland (only legal indicators) exclusively use one of the methods enunciated.

2. Use of indicators according to age groups:

¹² Austria, Belgium, Belgium - Flemish community, Belgium - German community, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, France, Germany, Italy, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Spain and Sweden.

¹³ Austria, Belgium – Flemish community, Bulgaria, Estonia, Germany, Hungary, Ireland, Lithuania, Luxembourg, Poland, Portugal, Romania, Slovakia, Slovenia and Spain.

¹⁴ Austria, Belgium – Flemish community, Belgium - German community, Bulgaria, Denmark, Estonia, Germany, Hungary, Italy, Malta, Netherlands, Portugal and Slovakia.

¹⁵ Áustria, Belgium – Flemish community, Czech Republic, Estonia, Hungary, Latvia, Malta, Netherlands, Poland and Portugal.

As seen in Section A, age-based classification is a widely established regulatory practice among the 24 NRAs (21 NRAs)¹⁶, with around two-thirds of NRAs explicitly relating harmful content indicators to age-specific ratings.

The most common structure of age ratings is 7+, 12+, 16+, 18+, with some variations (e.g., Estonia only has 12+ and 18+; Lithuania uses N-7, N-14, S, these indicate that content may be harmful to children and youngsters under 7, under 14, or all minors, respectively).

The implementation of age ratings differs among the countries: some use age classifications that are considered in their legal systems, while others rely on co-/self-regulation and guidelines.

Countries that have age classifications in their legal systems are Germany, France, Poland, Romania and Luxembourg, with detailed thresholds written into law, with strong enforcement.

Concerning co-/self-regulation systems, NRAs such as Austria, Bulgaria, Netherlands (through NICAM) and Denmark rely on industry codes, guidelines, or shared responsibility with regulators.

In France, Arcom does not apply automatic descriptors or pre-coded rating systems. Instead, classification is the result of editorial assessment by the broadcaster, guided by regulatory principles and post-monitoring by Arcom. This method contrasts with automated or questionnaire-based systems such as Kijkwijzer (Netherlands) or FSK (German self-regulatory body of the movie industry), which rely on structured indicators and predefined pictograms to determine age ratings.

3. List of categories and classification criteria for assessing content harmful to minors:

A majority of NRAs do have categories and classification criteria (see Table 2, in annex), while others rely on broader or context-based assessment frameworks rather than formally codified lists.

Identified common harmful content indicators/categories include violence, sexual content, coarse language, use of substances, fear, and dangerous imitable acts broken down as follows:

- Violence (e.g., intensity, frequency, realism, psychological, physical);
- Sexual content (e.g., nudity, sexual innuendo, erotic or pornographic material);
- Language (e.g., mild vs. strong swearing, vulgar expressions);
- Substance use (e.g., alcohol, drugs, smoking);
- Fear/scary elements (e.g., frightening or disturbing scenes, horror themes);
- Dangerous behavior / imitable acts (e.g., suicide, self-harm, reckless acts);
- Discrimination or difficult topics (e.g., racism, incest, abuse, domestic violence).

¹⁶ Austria, Belgium, Belgium – Flemish community, Bulgaria, Cyprus, Denmark, Estonia, France, Germany, Hungary, Latvia, Lithuania, Luxembourg, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Italy.

- Less commonly addressed (emerging/online harms) are cyberbullying, image-based abuse, mis/disinformation and manipulative content.

Content classification generally relies on four criteria such as explicitness (graphic detail), degree and frequency (repetition/intensity), severity (seriousness of impact) and context (purpose, setting, realism and intent).

Some countries said they apply all four criteria across a broad spectrum of harmful content, including both traditional and digital harms (e.g. Lithuania, France, Italy, Cyprus, Belgium-German Community and Czech Republic). Other NRAs said they consider explicitness, degree and frequency as well as context, but not severity (e.g. Luxembourg). Ireland mentioned bearing in mind explicitness as a criterion in particular regarding violence and pornography explicitly flagged as harmful.

While many NRAs use fixed and pre-defined lists of content descriptors, others follow a differentiated model based on guiding criteria and contextual assessment. Spain represents one such differentiated model: providers classify content through editorial judgment following the CNMC's official guidelines, applying the principle of proportionality and ensuring that age ratings reflect the tone, context and potential impact of each work.

The descriptors associated with harmful content categories vary from country to country. Examples can be found in the systems shared by AKOS (<https://gledoskop.si/>), CMS (<https://www.jsso.sk/>) and VRM (<https://www.goedgezien.tv/>)¹⁷, as well as in the CVDM (<https://www.kijkwijzer.nl/>).

The approaches described above primarily concern linear audiovisual services. For on-demand (VOD) and video-sharing platforms (VSPs), the AVMSD foresees distinct regimes: while VOD services apply co-/self-regulatory age ratings and provide parental controls, VSPs are mainly subject to procedural obligations to protect minors, rather than direct content classification.

4. Application of the content classification system:

In Europe, content classification is primarily industry-led within legal or co-regulatory frameworks, while regulators supervise, monitor complaints or intervene where necessary. Direct classification by regulators or public bodies is the exception, not the rule.

- Industry-driven approach dominates: The vast majority of respondents (15) place classification responsibility on providers, with regulators monitoring.

¹⁷ As an example, in Slovakian regulator, CMS, descriptors for violence are: «violence against a human being that involves cruel harm or the cruel violent death of a person without any expression of remorse, or the torture of a person, or the use of a weapon as an instrument of attack for entertainment purposes; a detailed and naturalistic act of violence; the abuse of an animal; the use of the weapon which is excessively approved, trivialized, or overused; real violence or the depiction of the consequences of real violence; depiction of the consequences on a living being during a natural disaster, armed conflict, or traffic accident; psychological violence, especially verbal violence or incitement to psychological harm; violence against the helpless, especially a child or an animal.

- Public authority classification is less common: Germany, France, Denmark and the Czech Republic have regulators or public bodies that apply classification systems more directly.
- Mixed/shared responsibility: Some countries (Austria, Spain, Portugal and Bulgaria) combine industry-led classification with oversight or parallel roles for public bodies (film boards, cultural inspection, codes of conduct).
- Self-regulation & co-regulation are central: Systems like NICAM (Netherlands), self-regulatory guidelines (Austria), and agreements (Portugal) highlight reliance on collaboration with industry.

5. **Case Study - The Kijkwijzer system:**

The [Kijkwijzer system](#) developed by NICAM, is a tool designed to protect children and youngsters from harmful content and issue parental guidance. The system is designed together with the industry and specialists. It uses broad age ratings categories (6, 9, 12, 14, 16 and 18 years old) and pictograms (violence, fear, sex, discrimination, drug- and/or alcohol abuse, and coarse language) to sign the possible harmfulness (and not suitability) of content and give information to parents, care givers and children.

The system intends to be neutral, ie, putting aside in their evaluation “norms or values, themes or the quality of a film, series, television programme or online video” due to cultural countries and parents differences (see, [Harmfulness vs. suitability](#)).

As an example, a serious documentary is advisable for all ages, because it does not have potentially harmful images for children. Nevertheless, it can be inappropriate for small children because the content is too difficult or because they cannot read the subtitles.

Also, even if a film deconstructs violence or discrimination, the pictogram for violence is signed so that children and parents are aware of the presence of such content that can be harmful for children because of different maturity grades.

Classification is based on the filling of a questionnaire, designed by NICAM in consultation with experts, by broadcasters and distributors. Questions are about violence, fear, sex, discrimination, coarse language and smoking, alcohol and drugs. As explained by NICAM, “a range of possible age ratings is attached to all of these subjects. The subject with the highest age rating determines the final outcome. So: if a film contains scary scenes that lead to 12 rating and violent scenes that lead to a 16 rating, the production will be rated 16 due to violence.” (see [How does Kijkwijzer work?](#))

Kijkwijzer system displays clear categories and descriptors (age ratings and content classification) in order to clarify options and information to the general public, parents and children.

Please see further details about the Kijkwijzer system in part D as for possibilities on tailor-made solutions on content classification.

SECTION C – TOOLS & METHODOLOGY

This section examines the methods and tools used for audiovisual content classification, the role of technological solutions, industry practices, the application of labelling systems, and the main challenges faced by NRAs in enforcement.

Manual classification remains the predominant model across Member States. These systems are established in national legislation and usually follow either structured procedures or complaint-based processes.

As an example of complaint-based analyses, in Bulgaria, the CEM reviews potentially harmful content internally or following complaints, in accordance with its legal obligations. As for Portugal, ERC combines systematic monitoring of news with complaint-based assessments; each complaint results in a detailed viewing report under the Television and On-demand Audiovisual Services Law and ERC's Resolution 2016/249 (currently under revision). In Lithuania, the RTCL conducts case-by-case manual classification of potentially harmful content, initiated either by complaints or through routine monitoring, with final decisions taken by its Commission. RTCL also noted that traditional broadcast-oriented systems are not easily transferable to on-demand and user-generated platforms. In Denmark, classification is also performed manually by a dedicated taskforce within the NRA.

Alongside this baseline, 3 NRAs¹⁸ are testing hybrid approaches that combine automated tools with expert validation.

In the German-speaking community of Belgium, the Medienrat uses an AI tool to identify potentially illegal content, but experts always take the final decision. In Estonia, providers are permitted to apply automated flagging, although all decisions are confirmed by regulators under human oversight. In the French-speaking community of Belgium, the CSA piloted the KIVI system in 2022, which used AI to detect pornographic material on platform X. While KIVI was able to prioritise items and suggest ratings, all results were verified by human reviewers, who retained full authority. Based on this experience, the CSA views KIVI as a useful triage tool, but not as a substitute for expert judgement. In Spain, CNMC initially made two unsuccessful attempts to use tools available in the market: AWS de Amazon (abandoned due to configuration difficulties and bureaucracy associated with the service), and Azure de Microsoft (abandoned once we realized that the tool was "as is," meaning it could neither learn nor adapt to our needs); once the market failed to meet our needs, for example, video analysis to search for tobacco or alcohol, CNMC has started its own developments, but they are still in the testing phase and we cannot provide any results or information about them.

Across all responses, regulators emphasised that technological systems cannot yet replicate the contextual judgement and proportionality required for legal certainty. While most NRAs expect future models to combine automated flagging with expert oversight, none envisage a full replacement of human review. The consensus is that human expertise will remain indispensable to ensure accuracy, proportionality, and trust in classification systems.

Regarding the question of the tools used by industry, in general NRAs reported not having knowledge of such tools.

As for the presentation of content classification to viewers, most NRAs use age-based ratings (e.g. 7+, 12+, 16+, 18+) combined with visual symbols or pictograms, while a smaller number also apply on-screen text or audio warnings, mainly in the context of traditional broadcasting. As an example, in Spain, the CNMC requires the display of visual pictograms indicating the age classification, but no audio warnings are used. In

¹⁸ Belgium - French community, Belgium - German community and Estonia

France, classification obligations are legally binding: audiovisual and on-demand providers must apply ARCOM's official rating and labelling system, in accordance with the Code de la communication and the regulator's binding deliberations. These rules include age categories, pictograms and time-of-broadcast restrictions. In the Netherlands, the Kijkwijzer system offers an internationally recognised approach applied both to broadcast and online services. No NRA reported the adoption of entirely new or alternative labelling systems. This indicates a high degree of harmonisation in broadcast media but a much slower adaptation of these standards to the digital environment.

Finally, NRAs identified several key challenges in applying and enforcing classification requirements. Cross-border enforcement was the most frequently cited problem, with regulators stressing that the country-of-establishment principle delays action and weakens the effectiveness of national measures. The volume of content, particularly on platforms hosting user-generated videos, was also considered a major obstacle, making comprehensive manual review unsustainable. Another recurring difficulty was the absence of common EU-wide classification indicators, which makes comparability more difficult while fully respecting national frameworks and practices. Regulators also pointed to the challenge of adapting broadcast-oriented frameworks to digital services, highlighting the legal uncertainty surrounding livestreams, virtual reality and interactive formats. Several authorities mentioned legal ambiguity, resource constraints and a shortage of trained classifiers or technical experts, while others noted inconsistent implementation of classification rules by providers and difficulties in aligning practices across borders. Finally, a smaller number of NRAs, including those in Cyprus, Czechia and Portugal, underlined platform resistance, pointing to reluctance from some providers to share information or adapt internal systems.

Taken together, these responses suggest that regulators face a demanding enforcement environment marked by jurisdictional complexity, the scale of online content, the absence of harmonised indicators, and limited cooperation from providers. A recurring theme is the lack of transparency around the tools and methods used by platforms, which continues to undermine effective oversight and contributes to uneven enforcement across the EU.

SECTION D: VOLUNTARY TAILOR-MADE CLASSIFICATIONS THAT RESPECT EACH COUNTRY'S CULTURAL STANDARDS

In Section D of the report, we **examine the use and potential of tailor-made solutions** (meaning voluntary use of localised age ratings and content descriptors based on the country of audience) in content classification. Drawing on the questionnaire results, **in this part of the report we take a closer look at national legislation and the potential appetite among EU NRAs for adopting such an approach.** This solution would also necessitate strong **cooperation between the country of origin (COO) NRA, which formally enforces decisions, and the country of destination (COD) NRA**, which provides support in case handling and at the same time willingness of the media services providers seeing the value of localised systems to their viewers. Several case studies (The Spanish regulatory cooperation model and examples of rapid development of technologies in this area) are included to illustrate the findings. The potential of AVMSD revision to facilitate deployment of such solutions if the co-legislators foresee any changes in this area is explored as well.

1. Legal flexibility for bespoke solutions

In this part, we explore tailor-made solutions in content classification. We explain the AVMSD context and the possibilities of national law when allowing the use of different classification systems in different territories within the COO principle. Based on the broad coverage of the questionnaire responses¹⁹, we also describe the current legislative and regulatory situation across EU member states.

In the **COO system**, a cornerstone enshrined in the AVMSD, the media service provider falls under the jurisdiction of the COO. Therefore, it must comply with the classification system of that particular country. However, within the EU, many media service providers operate across borders and offer their programmes in the jurisdiction of other countries as well (sometimes even across the whole EU as it is the case for some VOD providers).²⁰ Even when offering their services in a different country, they are normally required to use the classification system of the COO. **The premise of this report is that in such cases, a voluntary use of tailor-made classification** of the country of targeted audience or a proprietary system of the provider providing similar level of protection could be considered. However, this should be based on an agreement between the countries and a media service provider, while respecting the COO principle.

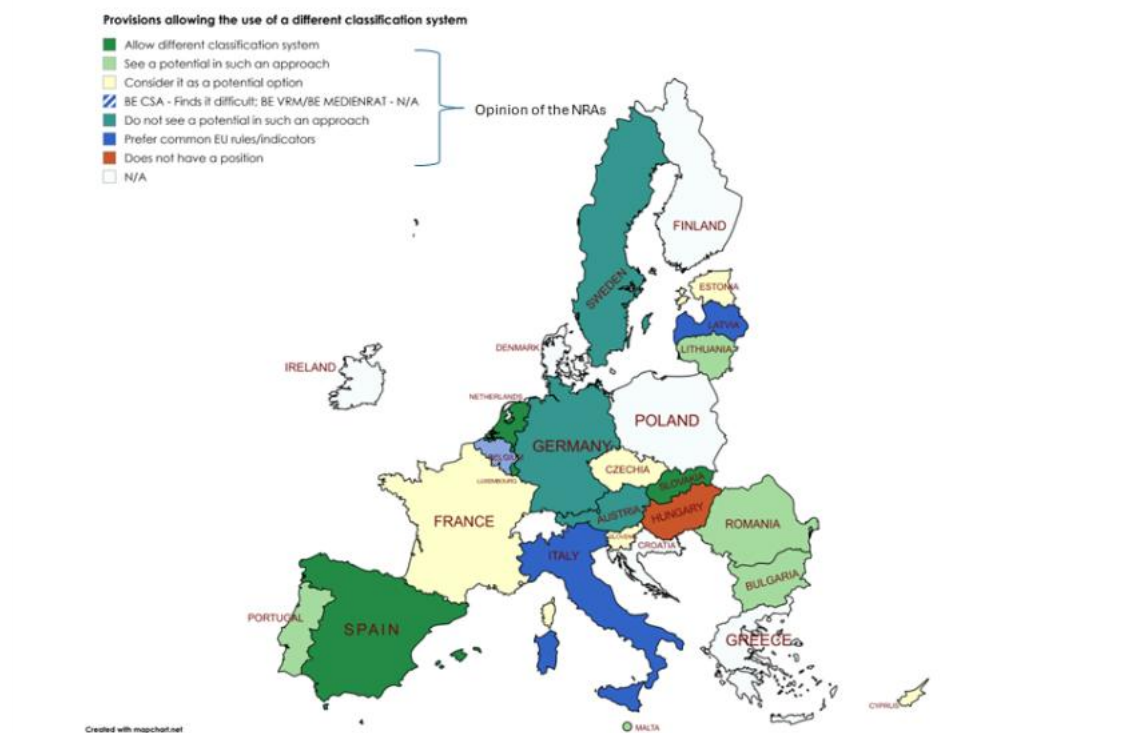
The advantage of such a solution is that the audience of the targeted country is most familiar with its national system and can make therefore more-informed decisions when it comes to the protection of minors. In addition, there are cultural specificities and sensitivities that differ among countries. What is acceptable for a 12-year-old in one country may be considered too mature in another under the different classification systems (see the section B for an overview of the difference between the classification systems). This is the logic of some of the legislative provisions described below and the premise of this part of the report exploring tailor-made solutions over maximum harmonisation, which limits the ability to reflect local cultural norms.

2. Overview of legislation and practice

Although the AVMSD does not explicitly allow or encourage the voluntary use of different classification systems, it does not prevent member states from doing so in their more detailed rules in line with article 4 of AVMSD. This would be possible within the COO system, if supported by efficient cross-border cooperation (structured cooperation established by Article 14 of the EMFA can enable this). In order to operationalise such a system, there must first be a willingness to adopt this solution from the COO NRA, the targeted country NRA, and the media service provider. **Therefore, it is up to individual countries to allow** this in their legislation. To formalise this approach, the inclusion of an explicit enabling clause or a recital authorising or encouraging it may be considered in the context of the AVMSD evaluation by the co-legislators.

¹⁹ Responses were collected in Q2 2025 from 26 NRAs.

²⁰ In 2024, TV services with multi-national or pan European coverage accounted for 23% of the European market, while VOD services showed a comparable trend at 13%. EAO, Audiovisual media services in Europe - 2024 data - <https://www.obs.coe.int/en/web/observatoire/-/audiovisual-media-services-in-europe-2024-data>



Data based on the questionnaire responses from NRAs.

Based on the responses to the questionnaire, **there are 4 countries whose legislation allows already the use of different classification systems.**

- In **Luxembourg**, a provider that mainly targets audiences in another country may choose to apply that country's classification. It must notify the NRA, which must then approve it. Based on ALIA's experience, the practical application of another Member State's classification system may require a detailed understanding of that country's legal framework and cultural classification practices. This may create risks of differing interpretations and reduce legal certainty for both the regulator and the provider. These aspects should be taken into consideration when evaluating the feasibility of tailored cross-border classification solutions.
- In **Spain**, there is an exemption from applying the Spanish system outside of Spain. Audiovisual media services provider may instead apply another classification system in programmes broadcast exclusively in other member states, as long as the protection of minors is guaranteed as set out in Article 98.6 of Spanish Audiovisual Law.
- This is also possible in the **Netherlands**, where audiovisual media service providers offering media content in another member state of the EU may apply a different classification if they can demonstrate to CvdM that the protection of minors under the age of 16 is at least equivalent to that offered by NICAM/Kijkwijzer.
- In **Slovakia**, providers can choose between the Slovak system or another accepted labelling system. The list of such recognised systems is published in a separate decree.

On top of this out of all responses, **majority of NRAs that responded see the potential in such a cross-border approach** with the exception of DLM (DE), MEMY (SE) and KommAustria (AT).

Going into further detail of the NRAs views:

- While not having this option in their law, there are **5 NRAs that see clear potential in such an approach**²¹
- The responses also showed that **5 NRAs consider it a possible option**.²²
- The CSA (BE Francophone) does not oppose such an approach but sees it as difficult in the absence of legislation. According to them, this may depend on broadcasters and service providers. NMHH (HU) has not established its position on this.
- Instead of having such a system, **2 NRAs prefer common EU rules or indicators for classification**.²³
- There are **5 NRAs that did not respond** to this question.²⁴

Even if there is no explicit allowance for such a provision in the AVMSD, it is **clear from the replies that it is possible for NRAs to have discretion to enable the use of different tailored classification systems if primary legislation stipulates** it. Secondary legislation could then provide further details, such as guidelines for implementing such a system or a descriptor equivalence list. In some cases, this may require bilateral agreements between NRAs, as has already been established in some member states.

3. Practical model: Regulatory cooperation

In such a voluntary system, **cooperation between the responsible authorities** could function on the basis that complaints would be formally handled by the COO NRA, which would directly receive the complaint and enforce the decision. As per COO principle enshrined in AVMSD, only the COO legislation could be enforced. This process could be supported by the COD NRA, particularly by any of the following: explaining the local system/sensitivities, facilitating the handling of complaints, providing opinions on cases, updating on the latest legislation, and managing translations. At the same time the service from COO applying voluntarily the system from another territory would need to get familiar with rating methodology and cultural environment. At the European level,

²¹ CEM (BG) considers different classification categories aligned with the cultural standards of other EU countries helpful for viewers. CNA (RO) acknowledges the potential benefits of such flexibility as long as minimum protection standards are respected. RTCL (LT) sees potential in allowing the use of different systems, as it could improve content accessibility and consistency for users. ERC (PT) stresses that this could better align with the cultural value system of the targeted country. MCA (MT) regards it as the probably best way forward to ensure the right levels of protection to the targeted audiences.

²² AKOS (SI) acknowledges the benefits of better aligning with the value system of the targeted country, but also sees challenges this would pose to the COO principle. ARCOM (FR) assumes that such a possibility would benefit local audiences. However, the service from COO applying the French system would need to get familiar with rating methodology and cultural environment. Arcom should be able to decide on the appropriateness of the chosen rate. According to CPTRA (EE), existing content classifications from other EU countries may be taken into account even though there is no explicit provision in national legislation. CRTA (CY) and RRTV (CZ) are possibly open to such an approach.

²³ AGCOM (IT) sees a potential approach that could involve the development of a common EU indicators for content classification. NEPLP (LV) would support unified EU rules regarding age classification.

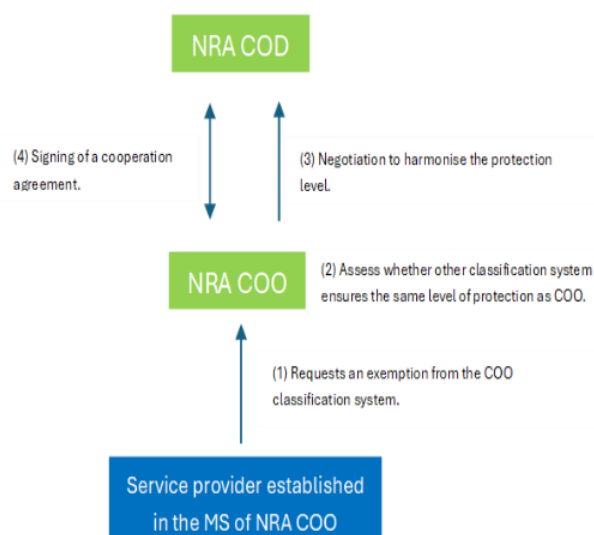
²⁴ Denmark, Ireland, Poland, Belgium (MEDIENRAR), Belgium (VRM).

cross-border coordination may be facilitated through Media Board internal guidance and a shared EU repository of classification standards.

The adoption of such a **cooperation model is enabled by Article 14 of the EMFA**, which establishes structural cooperation within the Media Board. This allows NRAs to request assistance or information and obliges a response within a set timeline, as stipulated in Article 17 of the EBMS Rules of Procedure²⁵.

The **advantage of such a cooperation model** is that the COO NRA can be assisted by the COD NRA, which has in-depth knowledge of its own system and the cultural specificities. This results in greater efficiency when applying different classification systems. When assessing content, context often plays a crucial role in determining the appropriate classification. A nuanced understanding of cultural sensitivities is needed, as these may differ across countries. This should be taken into consideration within such a cooperation model. Potential risks may arise if classification systems differ too much or if case-handling deadlines vary between countries. However, these challenges could be addressed through bilateral agreements on shared rules and technical standards.

Case study: the Spanish model



Based on interview with CNMC (ES)

To make such a potential model more concrete we describe below the **Spanish system** as an example. In Spain, there are media service providers that have used the possibility in law to request an exemption from the Spanish classification system. This exemption can only be requested for programmes broadcast exclusively in other member states, and the provider must demonstrate to the Spanish authority that the protection of minors complies with the level of protection set out in Article 98 of the General Audiovisual Communications Law. In this way, the authority can assess whether the other classification system ensures the same level of protection as Spain. Such requests have already been made for the following territories: Portugal, Greece, Germany, France, Cyprus, and Malta. As of the writing of this report negotiations are ongoing to

²⁵ Rules of procedure of the European Board for Media Services - https://media-board.europa.eu/document/download/9c6bca26-5835-46cc-825b-e582f1672a99_en?filename=Media%20Board%20Rules%20of%20Procedure.pdf

sign an agreement between the respective NRAs from these territories. In the initial stage, the parties must determine whether there is common ground in the indicators so that the systems are not too different. Based on CNMC's experience, definitions are often the same, the differences usually lie in the interpretation of the indicators, as each NRA applies them differently. At the current stage, the most advanced negotiations are with Portugal and Greece.

4. The technological solutions

In addition to the regulatory cooperation model described above, the rapid development of technologies, including AI, capable of generating localized classifications, may further support the feasibility of tailor-made solutions to content classification.

NRAs' views

According to the responses, 3 NRAs **indicated the use of AI tools to support content classification**, either by themselves or by the local industry.

- The **CNMC (ES)** initially, made two unsuccessful attempts to use tools available in the market: AWS de Amazon and Azure de Microsoft. Given that the market has not fulfilled CNMC's requirements—such as video analysis to identify tobacco or alcohol—CNMC has undertaken its own development initiatives. These remain in the testing phase, and therefore no results or further information can be disclosed at this time.
- In **Estonia** there are some broadcasters that implement AI-supported systems for pre-screening content, but manual review is still dominant.
- **Polish** media industries also use AI-based tools to support content operation, including age classification. Although, the broadcasters and VOD services primarily rely on human decision, AI algorithms are being used for tasks such as semantic analysis, tagging and flagging potentially sensitive content.
- **CMS (SK)** is exploring potential tools, with ongoing cooperation with BBFC that could support the process in the future.

In addition, there are 3 **NRAs that would like to see such AI tools developed at the EU level**.

- The AGCOM (IT) prefers the AI system for monitoring and classifying content based on common EU indicators.
- The CEM (BG) would welcome AI systems capable of processing different languages and content formats to support classification, including adaptations for new formats such as livestreams, virtual reality and short-form videos on online platforms.
- The RTCL (LT) considers the development of potential AI systems at the EU level to be helpful.

The deployment of AI systems in content classification is still at an early stage, but the technology is evolving rapidly. As highlighted in the NRAs' responses, **AI has a potential to streamline the classification process. Nevertheless, human involvement remains essential due to the strong context-specific nature of such assessments.**

Case studies

A cooperation model could be further supported by **tools that facilitate content classification**. For example, in 2025, the British Board of Film Classification (BBFC) launched an AI compliance tool, CLEAR²⁶, which generates localised age ratings for digital content specifically designed for streaming and VoD services. By using metadata derived from a single expert human viewing (facilitated by another tool currently in development) of the content, it can produce classifications for multiple countries. It has the capacity to generate age ratings for over 100 countries. CLEAR can currently deliver digital ratings for online use in Ireland and for international services in Bulgaria and Denmark. However, these countries do not have a legal requirement for age classification of digital formats. Additionally, Germany's Self-regulatory Body of the German Film Industry (FSK) is in the formal process of seeking accreditation by the federal authorities for CLEAR to generate legally recognised age ratings for digital, streaming and video-on-demand services in Germany. Furthermore, according to information from BBFC, the tool is able to support the understanding of local compliance by generating advisory ratings by the industry, which are not for external use, for Hungary, Lithuania, Poland, Portugal and Spain. On top of this there are already solutions that attempt to (semi)automatise/facilitate also the classification itself by generating compliance metadata for specific titles via AI tools. As an example, BBFC is currently developing²⁷ an AI tool to complement its existing classification processes in order to bring efficiencies to the end-to-end human viewing process. The AI tool is developed to identify and tag content issues (for example unconstitutional symbols in content distributed in Germany).

The **Kijkwijzer system**, operated by NICAM, could serve as another example of an efficient content classification system that is greatly facilitated by technological solutions. In this system, content creators classify their own material using a uniform set of criteria provided by NICAM that is ingrained in the classification and tagging tool that is programmed to make the assessments as objective as possible based on the tagging by the classifiers. Currently, NICAM trains over 600 classifiers worldwide within companies. The system is regularly updated based on scientific research and public consultations. The integrity of the system is ensured through random checks, the handling of consumer complaints, and supervision by the CvdM (NL). From NICAM's experience, cultural differences in rating content have been less significant than anticipated, only the implementation tends to vary. The uniqueness of the Kijkwijzer system is as well in its cross-border nature, as this system can be licenced out and adjusted to the specificities of other territories. This is already the case for example in Belgium. In case of wider deployment of a similar system across numerous EU territories this could provide another alternative to the tailor-made classification solutions described above by aligning the used systems between the territories.

SECTION E: RESOURCES

This section summarises the main regulatory and self-regulatory resources developed by national authorities, as well as their priorities for innovation and cooperation under

²⁶ BBFC - <https://www.bbfc.co.uk/press-releases/bbfc-launches-pilot-of-ai-solution-clear-to-generate-localised-age-ratings-for-global-digital-content>

²⁷ BBFC - <https://www.bbfc.co.uk/press-releases/bbfc-launches-pilot-of-ai-solution-clear-to-generate-localised-age-ratings-for-global-digital-content>

future Media Board initiatives. It maps the tools already in place, highlights relevant examples and identifies areas where coordinated development could add value.

Most NRAs have established codes or guidance to support content classification and the protection of minors. Examples include Austria's self-regulatory youth-protection guidelines, Belgium's Goedgezien platform and the CSA's recommendations, Bulgaria's Code of Conduct on labelling harmful content, and Slovakia's Unified Labelling System (JSO), which offers a structured and publicly accessible approach to classification. Romania's newly adopted Regulatory Code of Audiovisual Content updates criteria, symbols and obligations across all media, including video-sharing platforms. Lithuania's Law on the Protection of Minors, Ireland's forthcoming cross-agency research on public attitudes to age ratings, and similar frameworks in other Member States reflect the continuing evolution of national approaches.

When asked about new tools that could be developed at EU level, regulators focused on practical needs: greater alignment of classification methods, interoperable indicators, and technological support—particularly artificial intelligence—to manage the scale of online content. Many stressed that such tools should assist, not replace, human assessment, and must remain adaptable to national contexts.

Several NRAs proposed concrete directions for future cooperation. Authorities in Belgium, Estonia and Bulgaria favoured EU-level templates or verification mechanisms, including AI-based support and training for regulators. Others, such as Cyprus and Denmark, emphasised challenges specific to user-generated content and the desirability of a pan-European age-verification layer. Italy, Lithuania and Luxembourg supported common indicators or a shared classification model, while the Netherlands advocated gradual standardisation compatible with national constitutional values.

Some regulators, including Poland and Romania, favoured voluntary and flexible cooperation rather than new binding tools. The Polish authority underlined that existing systems already reflect national legal and cultural standards, while Romania suggested creating a shared repository of descriptors, interoperable metadata, and good-practice guidance to assist providers. Slovenia and Portugal expressed support for a coordinated approach, referring to Kijkwijzer as an effective model of cross-border interoperability.

Most NRAs indicated their readiness to participate in a Media Board working group on technical cooperation on classification methods, provided that priorities and resources are clearly defined. A few, including Estonia and Poland, declined active participation, citing the deeply cultural nature of classification standards and the risk that excessive harmonisation could reduce national responsiveness. Sweden expressed similar doubts about the added value of such a group. It was also noted that the Media Board, as an expert body with a technical and advisory mandate under the European Board for Media Services (EBMS), does not hold any legislative competence, which should be clearly acknowledged in the scope and objectives of any future work. Any future initiative in this area should remain strictly within the Media Board's technical and advisory remit. The report should not anticipate or pre-empt legislative developments at EU level, as any such evolution falls under the exclusive competence of the EU co-legislators.

Despite these differences, there is broad margin on key priorities. Regulators consistently emphasise the importance of media literacy, AI-supported enforcement, coherent classification for on-demand and video-sharing services, and interoperable

labelling and metadata. Many also highlight the value of shared repositories and exchanges of expertise to ensure consistent application across borders.

Individual contributions further illustrate this shared direction. The Dutch CvdM recommended involving national classification bodies such as NICAM and integrating new research on audience perception. Romania's CNA expressed interest in co-regulation models for platforms and context-sensitive classification. Slovakia's CMS focused on practical cross-border application, while Belgium's Medienrat referred to existing cooperation networks such as LfM and Safer Internet. Other authorities, including Denmark's SLKS and Czechia's RRTV, confirmed their willingness to contribute to all aspects of minors' protection, particularly regarding implementation and supervision of VSP obligations.

CONCLUSIONS

The report observed common patterns of categories and age ratings for classifying content which may impair the physical, mental or moral development of minors, as referred to in Article 6a and Article 28b(1)(a) AVMSD. While national systems reflect legitimate regulatory diversity and cultural specificities, practical cooperation challenges still arise from linguistic differences, varying resource levels among NRAs and limited platform transparency.

It assessed how EU Member States apply the AVMSD rules on the protection of minors. The analysis covered national laws and cross-country differences; age rating systems (7+, 12+, 16+, 18+); harmful content descriptors (e.g. violence, sex, drugs, inappropriate language, etc.); the role of video-sharing platforms; the use of new technologies (e.g. AI, classification algorithms, etc.); and the practical challenges faced by NRAs.

Many countries use similar age scales and common categories (pornography, violence, hate/discrimination, drugs, self-harm, gambling), but they differ in detail: some have very strict lists, while others follow more flexible approaches.

Video-sharing platforms apply the rules with different degrees of consistency and transparency, reflecting the diversity of national frameworks and enforcement capacities.

Although technology helps, it remains limited. Manual classification is still the norm, and while AI tests have shown potential, they have also revealed weaknesses, particularly in understanding context or nuances.

Allowing flexibility for services to voluntarily use the classification systems or an equivalent of the targeted markets (so called "tailor-made solutions") could ensure cultural specificity and user comprehension. Legal provisions allowing for such solutions are currently permitted only in four EU countries, although the majority of NRAs recognise the potential of this approach. Key obstacles in deploying these solutions include limited understanding of other EU countries systems and differing case-handling deadlines. However, case studies and examples from Member States where tailor-made content classification tools are already in use demonstrate promising potential. Tools such as the BBFC's AI-based system, which is capable of generating localised age ratings, or as the Kijkwijzer coding/classification system that combines automated and human coding could facilitate this approach.

Despite these challenges, cooperation among European NRAs is already well established. Regular exchanges within ERGA and the EBMS, as well as initiatives by

regional and co-regulatory networks, have fostered a shared understanding of national systems and promoted the exchange of practical experience, guidance tools and technological solutions. This ongoing collaboration demonstrates that there is already a strong basis for voluntary convergence across the EU, which can be further developed to address new cross-border and technological challenges collectively.

PROPOSALS

In light of this diagnosis, a set of practical, gradual and non-binding solutions is presented, developed within the EBMS framework and fully respecting the competence of Member States under Article 4 of the AVMSD, and the substantive provisions of Articles 6a and 28b(1)(a) concerning content which may impair the development of minors.

These options are exploratory in nature and intended solely to inform voluntary cooperation and knowledge exchange among regulators. They operate strictly within the limits of the AVMSD, in full respect of the Country of Origin principle (Article 3) and the minimum harmonisation framework (Article 4), and do not create new legal obligations for NRAs or Member States.

The proposed approach is structured around two complementary levels. First, the creation of common reference tools that provide a shared voluntary reference point, promoting greater coherence and interoperability between national systems. Second, the promotion of flexible solutions and voluntary cooperation mechanisms that allow this common baseline to be adapted to different cultural, legal, or technological contexts.

- **Create a European Repository of Indicators and Descriptors**, a “common guide” with shared categories, pictograms, and criteria, updated periodically to address emerging risks (AI, VR/AR, livestreams). This repository would serve as a voluntary reference tool, designed to facilitate comparison and cooperation between national systems, without limiting or replacing national competences in defining content which may impair the physical, mental or moral development of minors. The repository could be maintained collaboratively within the **EBMS framework**, through periodic contributions and validation by national regulators. This cooperative structure would ensure regular updates and transparency, while preserving the voluntary and non-binding nature of the instrument.
- **Develop a European Playbook**, a practical manual for regulators and platforms to apply criteria uniformly, including equivalence tables between countries and clear examples. It could also integrate media literacy components to help parents, teachers, and young people understand age classifications;
- **Promote “tailor-made” (flexible) solutions**, allowing systems adapted to specific cultures or technologies, provided they comply with the European minimum baseline, through clear cooperation protocols between country of origin and country of destination;
- **Reinforce transparency and auditing of platforms**, ensuring that regulators have controlled access to criteria, algorithms, and testing environments, and integrate these requirements within the existing DSA framework to avoid duplication.

These cooperative instruments would also contribute to the consistent implementation of the Digital Services Act (DSA), particularly in the area of systemic risk assessment and mitigation for minors, reinforcing the complementarity between the horizontal and sector-specific frameworks.

- **Establish a European Resource Hub**, a single access point with templates, indicators, glossaries, and shared metadata, to facilitate cooperation and support regulators with fewer resources.

Overall, the proposed approach aims to strengthen the protection of minors through practical and voluntary European tools, ensuring greater coherence between national systems while remaining strictly within the EBMS's technical and advisory mandate and without anticipating or implying any legislative development, which remains the exclusive competence of the EU co-legislators.

AVMSD EX-POST EVALUATION

This section does not formulate a recommendation but acknowledges the institutional context in which this report is published. The upcoming ex-post evaluation of the AVMSD may provide an opportunity for the European Commission and the EU co-legislators to reflect on lessons learned from the implementation of Article 6a. Any future consideration would remain strictly within the current legal framework, fully respecting the Country of Origin principle (Article 3 AVMSD), the minimum harmonisation approach (Article 4 AVMSD) and the competence of Member States to define content which may impair the development of minors. The options presented in this report are purely voluntary cooperation tools and do not anticipate or imply any legislative outcome.

As part of the forthcoming ex-post evaluation of the AVMSD, the findings of this report could serve to inform reflections on how to further enhance transparency and consistency in the application of protection-of-minors provisions across the Union. In this context, it could be examined — from a purely analytical and non-prescriptive perspective — whether voluntary tools such as a European Repository of Indicators and Descriptors might, in the future, contribute to a more coherent and transparent reference framework, including for video-sharing platforms (VSPs). Likewise, the evaluation could explore how flexible or “tailor-made” the approaches (voluntary option for services to use the classification systems or an equivalent of the targeted markets) already recognised by national legislation in some MSs and developed in practice by some NRAs are. This might complement the shared AVMSD framework by ensuring cultural specificity and user comprehension reflecting national cultural contexts and adapting to technological developments, including the use of AI-based tools.

ANNEX I

Table 2 – Content categories

NRA	Gratuitous Violence	Pornography	Violence	Fear, anxiety, horror, threat, intimidation	Sexual content	Image-based abuse	Mis/disinformation	Manipulative content	Coarse /Inappropriate language	Discrimination /hate speech	Substance abuse	Promotion of dangerous conducts	Bullying
AGCOM (IT)	●	●	●	●	●	●	●	●	●	●	●	●	●
AKOS (SI)	●	●	●	●	●	-	-	-	●	●	●	-	-
ALIA (LU)	●	●	●	-	●	-	-	-	●	-	●	-	-
AnmMH (AT)	●	●	●	●	-	-	-	-	-	-	-	-	-
Arcom (FR)	●	●	●	●	●	-	-	-	●	-	●	●	-
CEM (BG)	●	●	●	-	●	-	-	-	●	-	●	-	-
CMS (SK)	●	●	●	●	●	-	-	-	●	●	●	●	-
CNA (RO)	●	●	●	-	●	-	-	-	●	-	●	-	-
CNMC (ES)	●	●	●	●	●	-	-	-	●	●	-	●	-
Coimisiún na Meán (IE)	●	●	●	-	●	-	-	-	-	●	-	●	●
CPTRA (EE)	●	●	●	●	●	-	-	-	●	-	●	-	-
CRTA (CY)	●	●	●	●	●	-	●	●	●	●	●	●	-
CSA (BE - French)	●	●	●	-	-	-	-	-	-	-	-	-	-
CVDM (NL)	●	●	●	●	●	-	-	-	●	-	●	●	-
DLM (DE)	●	●	-	-	-	-	-	-	-	-	-	-	-
ERC (PT)	●	●	●	●	●	-	-	-	-	-	-	●	-
KRRIT (PL)	●	●	●	-	●	-	-	-	●	●	●	-	-
BA (MT)	●	●	●	●	●	-	-	-	●	●	●	-	-
MEDIENRAT (BE-German)	●	●	●	●	●	●	●	●	●	●	●	●	●
MEMY (SE)***	●	●	●	●	●	-	-	-	-	●	-	-	-
NEPLP (LV)	●	●	-	-	-	-	-	-	-	-	-	-	-
NMHH (HU)	●	●	●	●	●	-	-	-	●	●	●	●	-
RRTV (CZ)	●	●	●	●	●	●	●	●	●	●	●	●	●
RTCL (LT) *	●	●	●	●	●	●	●	●	●	●	●	●	●
SLKS (DK)	●	●	●	●	●	-	-	-	●	-	-	●	-
VRM (BE-Flemish) **	●	●	●	●	●	-	-	-	●	-	●	-	-

Notes: * Also: content distorting constitutional family values or promoting alternative views on marriage/family inconsistent with Lithuanian legal norms. ** Also: negative image. *** The Swedish Radio and Television Act refers only to detailed depictions of realistic violence and pornography as content harmful to minors. Furthermore, illegal hate speech is not permitted. Conditions on other violence/fear etc./sexual content not reaching the level of pornography are only applicable to television broadcasts in the terrestrial network and to public service.

Glossary on content categories:

Gratuitous violence: real or simulated graphic, realistic visual depictions of brutal acts of physical harm or cruelty to or the infliction of brutal physical harm or cruelty upon humans, animals, or human- or animal-like creatures and, taken as a whole, lacks discernable literary, artistic, political, or scientific value.

Violence: e.g. torture, inhuman treatment, degrading treatment, war scenarios, terrorist attacks, accidents, injuries, gender violence (physical or psychological violence against a person because of their sex or sexual tendency), domestic violence (physical or psychological violence among family members. Child abuse, or abuse of dependent or disabled people)

Fear/anxiety/horror/threat/intimidation: e.g. fear inducing or disturbing imagery, creepy and horror images, etc

Pornography: visual, audio, written, or digital content that depicts explicit sexual activity, genitalia, or sexualized nudity, whether real or simulated, and whether produced by electronic, mechanical, or other means.

Sexual content: e.g. nudity, intimate sexual acts, etc.

Image based abuse: e.g. distribution of intimate content without consent, revenge porn, etc.

Bullying: e.g., cyberbullying, exposure of personal content and any negative, mean or hurtful content messages

Mis/disinformation: e.g. related to health, elections, etc.

Manipulative content: e.g. deepfakes, manipulative advertising targeting children, etc.

Coarse /Inappropriate language: e.g. coarse words, swearing, cursing, strong, or offensive language

Discrimination/Hate speech: e.g. race, ethnicity, gender, sexual orientation, age, disability, religion or appearance, etc.

Promotion of dangerous conducts: e.g. eating disorders, self-harm, suicide, dangerous challenges, gambling or betting content, dangerous/antisocial behaviour

Substance abuse: e.g. legal drugs (use of alcohol, medication, tobacco) and illegal drugs.

Table 3 – Classification criteria

NRA	Explicitness	Degree and frequency	Severity	Context	Framing, soundtrack and language
AGCOM (IT)	•	•	•	•	-
AKOS (SI)		•	-	•	•
ALIA (LU)	•	•	-	•	-
AnmMH (AT)	-	-	-	-	-
Arcom (FR)	•	•	•	•	•
CEM (BG)	-	-	-	-	-
CMS (SK)	•	•	•	•	
CNA (RO) *	-	•	-	•	•
CNMC (ES)	•	•	•	•	-
Coimisiún na Meán (IE) **	•	-	-	-	-
CPTRA (EE)	-	-	-	-	-
CRTA (CY)	•	•	•	•	-
CSA (BE - French)	-	-	-	-	-
CVDM (NL)	•	•	•	•	-
DLM (DE)	-	-	-	-	-
ERC (PT)	-	-	-	-	-
KRRiT (PL)	-	-	-	-	-
BA (MT)	-	-	-	-	-
MEDIENRAT (BE-German)	•	•	•	•	-
MEMY (SE)	•	•	•	•	-
NEPLP (LV)	-	-	-	-	-
NMHH (HU)	•	•	•	•	-
RRTV (CZ)	•	•	•	•	-
RTCL (LT)	•	•	•	•	-
SLKS (DK)	-	-	-	-	-
VRM (BE-Flemish)	•	•	•	•	-

Notes: * Number and nature (in violent, domestic violence, and nudity and sex scenes), context (drugs and alcohol), the type of shot used, the realism of the representation, the role of the soundtrack (in violence and in generating fear or anguish), typology of heroes and psychology of characters. ** Pornography and gratuitous violence.

Glossary on criteria classification:

Explicitness: e.g. graphic detail

Degree and frequency: e.g. repetition, intensity, number and nature

Severity: seriousness of impact

Context: e.g. purpose, setting, realism, intent

Table 4 – Acts and instruments used for content categories and classification criteria

NRA	Acts and instruments used
AGCOM (IT)	Legislative Decree No. 208 of 8 November 2021 Legislative Decree No. 50 of 25 March 2024
AKOS (SI)	https://gledoskop.si/ General Act on the Protection of Children in Audiovisual Media Services contains detailed descriptions of criteria
ALIA (LU)	Law of 27 July 1991 on electronic media Grand ducal regulation of 8 January 2015 on the protection of minors in audio-visual media services
AnmMH (AT)	Association for the protection of minors through self-regulation of audiovisual media products and services See also: Youth Protection Report 2024
Arcom (FR)	Recommendation n°2005-5 of July 5, 2005 Deliberation of the 20th december, 2011
CEM (BG)	Radio and Television Act Code of Conduct for Protection Children's Development under Radio and Television Act
CMS (SK)	JSO Main binding document: 328/2023 Z.z. - Vyhláška Ministerstva kultúry Slovenskej republiky o jednotnom systéme označovania a spôsobe jeho uplatňovania; Media Services Act (Act No. 264/2022 Coll.) — main legal framework for media services in Slovakia: https://www.aspi.sk/products/lawText/1/98963/1/2?timeslice=27.06.2025&lastPara=58 .
CNA (RO)	Legal list of criteria (Art. 20(2) Regulatory Code Regarding Audiovisual Content ; Decision no. 573/2025 — Regulatory Code of Audiovisual Content, a legally binding regulation that updates classification criteria (Arts. 20–21), mandates content labels and visual symbols (Arts. 23–28), and sets specific obligations for the protection of minors across all media environments, including video-sharing platforms.
CNMC (ES)	Ley General de Comunicación Audiovisual: Law 13/2022, 7 june ; CNMC criteria under revision.
Coimisiún na Meán (IE)	Codes under Broadcasting Act ; Intends to publish in Q4 2025 a cross-agency research report (with the Irish Classification Office and the Ombudsman for Children's Office) on public attitudes to harmful/offensive content; the report will examine the accuracy and usefulness of age ratings, warnings, and support information for adults and children.
CPTRA (EE)	Media Services Act (MeeTS §19 and §22) Broadcasting Union Code
CRTA (CY)	Radio and Television Broadcasters Law 7(I)/1998 Radio and Television Broadcasters Regulations 10/2000; Legislation is under amendment and will include, among other elements, a list of indicators.
CSA (BE - French)	Summary of case laws from the Authorisation and Control Body (Collège d'autorisation et de contrôle -CAC). See also: https://www.csa.be/documents/?keyword=Protection+des+mineurs&term= and https://www.csa.be/wp-content/uploads/2025/09/CAVIS-Avis-01-25-Protection-des-mineurs.pdf
CVDM (NL)	https://www.kijkwijzer.nl/
DLM (DE)	Joint Guidelines of Media Authorities: Protection of Minors in the Media ("JMStV") and Youth Protection Act ("JuSchG") criteria for supervision in broadcasting and telemedia
ERC (PT)	Indicators from Law No. 27/2007 ERC Resolution 2016/249
KRRiT (PL)	Formal list of indicators in polish Broadcasting Act
BA (MT)	Subsidiary Legislation 350.18
MEDIENRAT (BE-German)	-
MEMY (SE)	Radio and Television Act (RTA)

NEPLP (LV)	Legal basis in Electronic Mass Media Law (Art. 24)
	Regulations Regarding the Classification of Films
NMHH (HU)	Act CLXXV of 2010 on Media Services and on the Mass Media the National Media and Infocommunications Authority
RRTV (CZ)	Act No. 231/2001 Coll.(on Radio and Television Broadcasting and on amendments to other acts) ; In addition, Czech Television (PSB) operates its own age-category labelling system beyond statutory requirements; several on-demand audiovisual media services also maintain self-regulatory labelling systems.
RTCL (LT)	Law on the Protection of Minors (Art.4)
	Law on Provision of Information to the Public (Art. 19), possibly harmful when targeting or reaching minors
SLKS (DK)	Media Council for Children & Young People
VRM (BE-Flemish)	Flemish Media Act; Decree of 19 Jan 2024 (Decree of the Flemish Government on informing viewers about programmes that may be harmful to the physical, mental or moral development of minors)
	GoedGezien