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COMMENTS ON THE EU DIRECTIVE COM (2010)94 final

The World Association for Sexual Health (WAS) supports the European Union's Directive **on combating the sexual abuse, sexual exploitation of children and child pornography**. As the global advocate for sexual rights we are particularly concerned with preventing the exploitation of vulnerable individuals and communities. We are fully aware of the difficulties associated with legislating to protect the rights of particular groups that may have an unintended impact on others. To this end, we make the following comments.

- I. The term "*primarily for sexual purposes*" is non-specific and may lead to idiosyncratic interpretations. It is suggested that this term be replaced with "*for the primary purpose of gratuitous sexual arousal*" or something similar.
- II. That a Clause be added to specifically exclude from the legislation material that is primarily intended to be educational or is an acknowledged by experts to be a work of art.

The WAS supports the intent of Article 8 and urges the EU to consider the importance of every child's right to receive comprehensive, age-appropriate, sexuality education. Evidence based sexuality education, delivered by appropriately educated teachers, provides protection against sexual exploitation and promotes sexual health.

The WAS is a multi-disciplinary organisation with members on five continents. We have the capacity to provide expert opinions, based on research evidence, from a wide variety of disciplines. The EU is encouraged to seek expert opinions on all matters associated with sexual health, sexual behaviour, sexuality education and sexual rights.

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