



The Chair and Members of the Committee on Women's Rights and Gender Equality
The Chair and Members of the Committee on Civil Liberties, Justice and Home Affairs
The Chair and Members of the Committee on Foreign Affairs
Of the European Parliament

Cc:

The Chair and Members of the Delegation to the EU–Ukraine Parliamentary
Association Committee - D-UA

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Stockholm, 16 of July 2026

**Subject: Urgent request for intervention regarding Ukraine's Bill No. 15294 and
the decriminalisation of the commercial pornography industry**

Dear Chairs and Members of the European Parliament,

Women's Platform for Action International (WoPAI), an international women's association serving as an umbrella network for women's organisations from around the world, is writing to express serious concern regarding Bill No. 15294, adopted at first reading by the Verkhovna Rada of Ukraine on 14 July 2026.

The official parliamentary page of the bill is available here:

<https://itd.rada.gov.ua/billinfo/Bills/Card/70129>

The bill is presented as legislation intended to strengthen criminal liability for the production and distribution of child sexual abuse material. We fully support stronger protection of children from sexual abuse and exploitation and stronger liability for the production, possession and distribution of child sexual abuse material.

However, the bill also introduces an entirely different and much broader policy change. It would decriminalise the import, production, storage, transportation, transfer, sale and distribution of so-called “adult” pornography.

This effect is not merely alleged by civil society. It is expressly identified in the bill’s explanatory note, comparative table and official conclusions issued during its parliamentary consideration.

The legislation therefore goes far beyond preventing the prosecution of adults for purely private conduct. It creates a legal basis for commercial production and distribution while providing no comprehensive regulatory or protective system addressing:

- trafficking in human beings and sexual exploitation within pornography production;
- coercion, deception, abuse of vulnerability and economic dependency;
- liability of companies and other legal persons;
- responsibility of pornography platforms, advertising services, search services and payment intermediaries;
- verification of age, consent and the provenance of uploaded material;
- rapid removal of non-consensual and exploitative material;
- preservation of digital evidence and cooperation with criminal investigations;
- remedies, compensation and specialised support for victims.

This approach raises serious questions regarding its compatibility with the objectives and requirements of the relevant EU acquis.

Directive 2011/36/EU, as amended by Directive (EU) 2024/1712, requires stronger prevention of trafficking, measures addressing demand that fosters exploitation, protection of victims, responses to the use of information and communication technologies in trafficking and liability of legal persons.

Directive 2011/36/EU:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011L0036>

Directive (EU) 2024/1712:

<https://eur-lex.europa.eu/eli/dir/2024/1712/oj/eng>

By removing criminal liability for commercial pornography-related activities, the bill creates the legal conditions for the expansion of a commercial pornography market that may conceal sexual exploitation, without corresponding detection, due-diligence and accountability mechanisms, risks directly undermining these objectives.

Directive (EU) 2024/1385 on combating violence against women and domestic violence requires effective criminal-law and protective responses to the non-consensual sharing of intimate or manipulated material, cyberviolence and related victimisation.

<https://eur-lex.europa.eu/eli/dir/2024/1385/oj/eng>

Bill No. 15294 contains no adequate system for urgent removal, platform cooperation, preservation of evidence, victim support, protection against repeated dissemination or effective remedies.

The Digital Services Act establishes duties concerning illegal content, protection of minors and mitigation of systemic risks affecting fundamental rights.

<https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>

Bill No. 15294 would expand the lawful commercial space for pornography without addressing the digital platforms, intermediaries, advertising systems and payment infrastructure through which exploitative and unlawful material may be circulated and monetised.

The bill must also be considered in light of the Charter of Fundamental Rights of the European Union, particularly its protections concerning human dignity, physical and mental integrity, privacy, personal data, equality between women and men and the rights of the child.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12012P/TXT>

Our concern is that Ukraine, an EU candidate country, is decriminalising a commercial industry without any comprehensive framework capable of distinguishing lawful material from material created through trafficking, coercion, abuse of vulnerability, sexual violence or non-consensual distribution.

The Parliamentary Assembly of the Council of Europe has also addressed the gender and human-rights consequences of pornography and called for stronger protection of children, effective responses to non-consensual material and regulation of online providers.

PACE Resolution 2412 (2021), “Gender aspects and human rights implications of pornography”:

<https://pace.coe.int/en/files/29579/html>

The timing makes the Ukrainian Parliament’s decision particularly disturbing. Ukraine is facing a severe demographic crisis and is asking women refugees and their children to return. At the same time, women affected by displacement, poverty, loss of housing and income, occupation and family separation face elevated risks of trafficking, online recruitment and sexual exploitation.

This creates a striking inconsistency to invite women to return while weakening legal barriers to an industry that may profit from precisely these vulnerabilities.

The war context also requires exceptional caution. Conflict-related sexual violence against Ukrainian civilians and prisoners of war has been documented, while sexualised abuse material has circulated online as an instrument of humiliation, intimidation and propaganda.

Decriminalising commercial pornography without strict duties concerning the provenance of material, rapid removal, evidence preservation and cooperation with investigators creates additional opportunities for the circulation and possible monetisation of material connected to grave human-rights violations and international crimes.

United Nations experts have also raised concerns about the role of pornography platforms, payment systems, search engines and other intermediaries in the sexual exploitation of women and girls:

<https://www.ohchr.org/en/press-releases/2026/05/un-experts-alarmed-complicity-online-pornographic-platforms-and-other>

We respectfully ask the FEMM, LIBE and AFET Committees, together with the Delegation to the EU–Ukraine Parliamentary Association Committee, to:

1. Address an urgent joint communication to the Chair of the Verkhovna Rada and the relevant Ukrainian parliamentary committees.
2. Call on the Verkhovna Rada to reject Bill No. 15294 at second reading.

3. Request, at minimum, the removal of all provisions decriminalising the commercial production, sale, transfer and distribution of pornography.
4. Urge Ukraine to place the necessary child-protection provisions in a separate, properly prepared bill.
5. Request an assessment by the European Commission of the bill's compatibility with Ukraine's accession commitments and the relevant EU acquis.
6. Encourage formal consultations with Ukrainian women's rights, child-protection and anti-trafficking organisations before any further parliamentary decision.
7. Raise the matter through the EU–Ukraine Parliamentary Association Committee and in relevant accession and rule-of-law discussions with Ukraine.

Requested timeline

We ask that this matter be raised as a matter of urgency.

Ideally, an initial communication should be sent to the Verkhovna Rada by 20 July 2026 or within five working days of receipt of this letter.

A request for an assessment by the European Commission should be initiated before Bill No. 15294 is scheduled for its second reading.

If the second-reading vote is scheduled at short notice, we ask the relevant committees and the D-UA Delegation to issue an urgent public or written statement before the vote.

Ukraine's European integration must strengthen the protection of women and children from trafficking, sexual exploitation and digital violence. It must not be used to legitimise a commercial industry without first establishing the safeguards, accountability mechanisms and victim protections required by European standards.

We would be grateful for urgent consideration of this matter before the second reading of Bill No. 15294.

Yours sincerely,

Ana Sofia Fernandes

Chair of Women's Platform for Action International (WoPAI)