19/10/2026

Comments of the Gender Equality Commission concerning Recommendation 2310 (2026) – "Violent pornography: a test for human rights"

The Gender Equality Commission welcomes Parliamentary Assembly Recommendation 2310 (2026) and Parliamentary Assembly's attention to violent pornography as ~~a gender~~ equality between men and women and human rights concern. This is consistent with longstanding Council of Europe work addressing the role of harmful ~~gender~~ stereotypes of women, sexism and violence against women and girls. However, the focus on violent pornography must not create an artificial distinction between violent and supposedly nonviolent pornography. Pornography as such shall be examined as a form of structural and systemic violence against women, rooted in unequal economic relations, sexual objectification and commodification of women. Pornography is a practice through which inequality of women is sexualised, normalised and commercialised. Violence against women cannot be reduced to visible acts of physical aggression. It must be understood through the structures that normalise women's sexual subordination and enable their exploitation.

The Council of Europe has long recognised the ~~gender~~ harmful impact of pornography on equality between women and men, including its links with sexism and ~~gender~~ sexbased stereotyping of women. Recommendation CM/Rec(2019)1 of the Committee of Ministers to member States on preventing and combating sexism and the Guidelines on the place of men and boys in gender equality policies and in policies to combat violence against women both call for the development of critical thinking to counter sexism in the content, language and illustrations of pornography and other media. Against this background, the Gender Equality Commission particularly welcomes the Recommendation's emphasis on awarenessraising, campaigns and education as important elements of prevention. Such measures must explicitly challenge male sexual entitlement, the demand that sustains the pornography industry and the normalisation of women's sexual availability, degradation and subordination. Prevention must not treat pornography solely as a question of harmful content or individual consumption. It is especially important that the Recommendation supports adoption without delay by the Committee of Ministers of a recommendation for comprehensive sexuality education that is mandatory, age appropriate, sciencebased, and that covers topics such as ~~gender~~ equality between women and men, boundaries, consequences of sexual violence (both for perpetrators and victims), consent, bodily integrity and personal autonomy, respectful personal relationships, emotional education and the prevention of sexual and sexist ~~genderbased~~ violence against women. Education must also critically address the limitations of consent under conditions of poverty, economic dependency, coercion, exploitation and unequal power. Formal consent cannot automatically be equated with genuine freedom

*The text in red sets out the recommendations of the European Network of Migrant Women for the present document.

when women's choices are constrained by inequalities. Furthermore, sexuality education must address pornography as a form of wider system of prostitution andexploitation integrating the voices of survivors of this form of systematic violence againstwomen.The Gender Equality Commission notes that thiswork by the Steering Committee on the Rights of the Child (CDENF) builds upon longstanding Council of Europe work which emphasises the gendered impact of pornography on women, including the Thematic guidance note (2025) on Safeguarding children from the risks of accessing online pornographic content, and the Feasibility study on ageappropriate comprehensive sexuality education to strengthen responses for – inter alia – preventing and combating violence, including risky or harmful sexual behaviour by children (2024) The specific focus on violent pornography is closely connected also to the Gender Equality Commission's work on violence against women and girls. The Gender Equality Strategy 20242029 highlights violent and degrading online content, including in pornography, as reinforcing stereotypes portraying women as submissive and contributing to the normalisation of sexual violence. Recommendation CM/Rec(2026)2 of the Committee of Ministers to member States on accountability for technologyfacilitated violence against women and girls also recognises the relevance of violent pornography in the context of technologyfacilitated violence, with its Explanatory Memorandum highlighting its potential to normalise violence against women and girls. In this context, the Gender Equality Commission welcomes the emphasis of Recommendation 2310 (2026) on improving knowledge of the prevalence and effects of violent pornography and on assessing the impact of measures taken to prevent and counter it.

Such efforts must examine the pornography industry itself, including the economic structures, digital platforms, producers, distributors and financial actors that profit from it. Responsibility cannot be limited to individual perpetrators or the removal of visibly violent content.

Additionally, particular attention must be paid to migrant, refugee, asylumseeking, undocumented women, whose vulnerability to sexual exploitation is compounded by racism, poverty, insecure residence status, exclusion from employment, dependency on exploitative intermediaries, as well as trauma experienced as a result of war, conflict and forced displacement. The racialised and colonial dimensions of pornography, including the fetishisation, stereotyping and dehumanisation of women based on race, ethnicity or nationality, must be explicitly addressed rather than only pointing out strangulation.

The Gender Equality Commission stands ready to contribute to efforts advancing the objectives of the Recommendation and to support coherence with the Council of Europe's existing work on gender equality, sexism and violence against women and girls.

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