



# **Digital Fairness for Women and Girls: Tackling Manipulative Practices Online and Ensuring Protection for Women and Girls in the Digital Environment.**

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**Submitted by: European Network of Migrant Women (ENoMW)**

**Contact: [info@migrantwomennetwork.org](mailto:info@migrantwomennetwork.org)**

## 1. Executive Summary

The European Network of Migrant Women is pleased to submit its contribution to the open consultation on the Digital Fairness Act, which represents a key opportunity to strengthen consumer protection in the digital single market.

Women and girls are disproportionately affected by manipulative digital practices, including addictive design, dark patterns, influencer marketing, and exploitative advertising in sectors such as fashion, beauty, wellness, pornography and prostitution. These practices not only harm their mental health, but also exploit their vulnerabilities, including targeting minors, while **fragmented national approaches leave protections uneven across the EU.**

We recommend the Commission to **explicitly recognise women and girls as vulnerable consumers and ensure cross-border legal coherence to promote fairness, safety, and equality online.**

Key concerns include:

- **Mental health and body image:** Algorithms amplify male-dictated beauty standards, driving anxiety, eating disorders, and self-doubt.
- **Influencer marketing:** Young women face constant hidden advertising, while female influencers are left unprotected by opaque contracts and weak oversight of marketing agencies.
- **Addictive design and scams:** Dark patterns and fraudulent e-shops, particularly on platforms like Pinterest, target women in trusted digital spaces.
- **Glamorisation of prostitution and pornography:** False recruitment ads, degrading and dehumanising content, and the glamorisation of exploitation normalises the abuse against women and girls.

## 2. Tackling Manipulative Practices Online and Ensuring Protection for Women and Girls in the Digital Environment

Women and girls are disproportionately affected by manipulative digital practices, with effects on their mental health and body image, which are further exacerbated by influencer marketing and hidden advertising. Furthermore, women are the primary target and victims of advertising of prostitution and pornography, further fuelled with the advancement of Artificial Intelligence, requiring cross-border coherence and legal certainty to address the pressing challenges in the digital environment.

**2.1. Mental Health, Body Image, and Manipulative Advertising:** Women and girls are exposed to online content promoting **unrealistic beauty standards rooted in sexist male-dominated norms**, diet products, and cosmetic procedures. Algorithmic curation amplifies harmful stereotypes, creating addictive cycles of comparison and self-doubt. **This contributes to anxiety, depression, and eating disorders among women - especially young women -**, making it a critical consumer protection and public health issue.

**2.2. Influencer Marketing and Hidden Advertising:** Influencer marketing disproportionately targets female audiences and relies heavily on female influencers. Current gaps in disclosure requirements and enforcement mean young women are **routinely exposed to hidden advertising promoting potentially harmful products**. Furthermore, female influencers themselves often face **opaque contracts and unclear legal responsibilities**. Regulation should protect both consumers and influencers, while also **holding marketing agencies accountable for ensuring transparency and fairness in digital advertising practices**.

**2.3. Addictive and Manipulative Design in Female-Coded Consumer Spaces:** Industries such as fashion, beauty, wellness, and lifestyle apps deploy manipulative design, including countdown timers, limited-time offers, subscription traps, and complex cancellations, that exploit consumer vulnerabilities, especially young people. Unfair practices are concentrated in sectors where women are the dominant consumers: for example, on platforms like **Pinterest**, e-shops linked through promoted pins or ads often lead to scam websites or unreliable sellers. These are presented in a visually appealing, trusted environment, making consumers - especially women - more vulnerable to fraud, hidden charges, and difficulty in obtaining redress.

**2.4. Advertising Linked to promotion of Prostitution and Pornography:** Digital advertising in and around prostitution and pornography creates layered risks that disproportionately harm women and girls, including:

- **False advertisements:** Many so called “job opportunities” in modelling, hospitality, or entertainment turn out to be covert recruitment pathways into prostitution or pornography. These ads often appear online as legitimate offers but function as gateways to exploitation and trafficking.
- **Direct advertising of prostitution and pornography:** Online ads for prostitution and pornographic content overwhelmingly position women as the product in these advertisements, in degrading and objectifying ways, while men are the targeted consumers. In these ads, women are the victims of exploitative advertising practices with men being the primary consumer target, further reinforcing the demand-driven abuse and exploitation, and amplifying the abuse and commodification of women.
- **Glamorisation of exploitation:** A growing and alarming trend in digital advertising is the glamorisation of prostitution and pornography, presenting these as “aspirational”, “empowering” or “lucrative opportunities”. Similarly, an increasing number of ads target women for reproductive exploitation portraying invasive and life threatening egg harvesting and surrogacy as an easy income or fulfilment of women’s ultimate dream of making others happy by gestating for them. This narrative is rooted in stereotyping of women and it normalises women’s abuse, exploitation and commodification, and creates pressure on young women and girls to see these exploitative systems as a viable or even desirable path. At the same time, it further reinforces demand among male consumers of prostitution/pornography and among heterosexual and homosexual buyers seeking to purchase babies, by presenting women’s exploitation and abuse as socially acceptable and even ‘altruistic’
- **Harm to minors:** Minors are at particular risk due to weak age-verification systems and algorithmic promotion that exposes young people to sexualised and abusive content at an early age. For some, especially boys and young men, this becomes a gateway into addictive patterns of pornography consumption.

Given the cross-border nature of these practices, **only EU-level intervention can provide effective protection. The Digital Fairness Act should prohibit manipulative and misleading advertising related to prostitution and pornography**, ensure stricter rules on age verification and transparency, and address the role of intermediaries that profit from the exploitation of women and girls.

**2.5. Cross-Border Coherence and Legal Certainty:** Fragmented national regulation leaves protection uneven, undermining the single market and disproportionately exposing women and girls to harm. EU-level intervention is required to ensure equal protection, reduce market fragmentation, and provide legal certainty for businesses and consumers.

### 3. Recommendations

To ensure that the Digital Fairness Act effectively protects women and girls and addresses the nature of manipulative digital practices, especially on women and girls, we recommend that the Commission include the following priorities:

- **Recognise the patterns of harm on women and girls:** Explicitly acknowledge that manipulative and deceptive online practices disproportionately target women and girls, particularly in areas such as body image, beauty, lifestyle, and sexual exploitation. This acknowledgement should guide risk assessment, enforcement of priorities and policy design.
- **Tackle false advertising and exploitative recruitment:** Include clear provisions against false job advertisements and misleading offers that function as getaways into prostitution, pornography, egg harvesting, surrogacy or other exploitative industries. Platforms should be required to verify such advertisements and held liable for hosting deceptive and exploitative recruitment content.
- **Prohibit manipulative, degrading, and glamorising advertising of prostitution and pornography, as well as reproductive exploitation of women:** The Digital Fairness Act should explicitly prohibit online advertising that glamorises, normalises, or trivialises prostitution and pornography. Stricter obligations on platforms to prevent and remove such content are essential, along with robust age-verification.
- **Regulate intermediaries and marketing agencies:** Responsibility should not rest solely on influencers or end users. Marketing agencies, intermediary networks, and platforms should face clear legal duties to ensure transparency, fairness, and compliance with advertising rules. This includes liability for manipulative design, hidden promotions, or harmful partnerships.
- **Address platform-specific manipulation and fraud:** Require platforms such as Pinterest, Instagram, and TikTok to monitor and prevent scams, fraudulent e-shops, and covert marketing strategies that disproportionately target women. Mechanisms for redress and consumer compensation must be accessible, effective, and harmonised across the EU.
- **Strengthen protections for minors and young people:** Enforce strict age-verification measures and mandate algorithmic safeguards to prevent minors' exposure to abusive content. Education campaigns should accompany regulation to build digital literacy among young users.
- **Ensure cross-border coherence and enforcement:** Given the transnational nature of online platforms and advertising networks, the Digital Fairness Act must include mechanisms for coordinated enforcement, information sharing, and joint investigations between Member States. Fragmented national approaches risk leaving significant gaps in protection.

### 4. Conclusion

The Digital Fairness Act must go **beyond general consumer protection and explicitly address the digital harm on women and girls**. By targeting manipulative design, exploitative advertising, and unsafe digital practices, and by ensuring cross-border coherence, the Act can protect women and girls, promote equality between women and men, and strengthen consumer trust across the EU. Such regulation is not just a matter of fairness, but essential for a safer, more transparent, and socially responsible digital single market.