Re: Public consultation on the draft Committee of Ministers recommendation on online safety and empowerment of content creators and users

The Data Transfer Initiative (DTI) is pleased to offer brief comments on the Council of Europe's draft Recommendation to member States on online safety and empowerment of content creators and users. DTI is a nonprofit organization based in the United States working around the world to enable simpler, faster, and more secure data transfers through data portability at scale. We advance our mission through the design and implementation of open source data transfer tools and by serving as an expert policy resource to regulators and other stakeholders around the world. We believe that data transfers, particularly when implemented against a foundation of privacy, security, and trust, offer significant benefits for user empowerment and online safety.

Empowering Users: Our policy and technical work is grounded in the principle that users and content creators should have the tools, infrastructure, and ability to take their data, digital identities, and content with them. Paragraph 67 of the draft Recommendation articulates this idea powerfully, noting that "[p]latforms should not obstruct the ability of their users, including content creators, to move their online profiles to other complementary or competing platforms." Users deserve meaningful control over their digital experiences—control that includes the ability to move between services if platforms no longer meet their needs, values, or expectations. Data portability allows individuals to decide where their data resides and how it is used, but also empowers people and builds trust between consumers and companies, leading to healthier digital ecosystems.

Online Safety: We also strongly support the draft Recommendation's framing of user empowerment as a core component of online safety. Empowered users are better equipped to navigate digital environments, respond to online risks, and shape their experiences in accordance with their values. When users encounter unsafe or misaligned online environments, the ability to exit and take their data with them is critical. Sudden shifts in platform content policies, monetization practices, or community guidelines can leave users and content creators frustrated, disempowered, and unable to meaningfully respond to risks with practical solutions. Today, in many contexts, users lack effective portability tools, leaving them stuck with an unpalatable choice to suffer through a service that does not feel safe, or disconnect from a community (or source of income) that has become highly meaningful to them or that they are dependent on.

We encourage the Council of Europe to consider data portability as a significant positive option to help achieve its stated objectives of protecting online safety and ensuring online empowerment. Giving users the ability to move between services does not just increase competition and innovation—it gives people the tools they need to participate safely, fully, and confidently in the digital world.

We thank the Council for its thoughtful approach to these important issues and offer our expertise on data portability further as this work continues.

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