

## Written inputs to Spain's Seventh Periodic Report: Points 152 and 153 on "Minors in Bullfighting Events"

Dear Sirs/Madams:

In 2022, we presented the report "Lack of Protection of Children from the Violence of Bullfighting in Spain" to the Committee, to inform you of the continuous violations of both the Convention and the Committee's recommendations by the national, regional, and local governments in Spain regarding the protection that should be afforded to children against violent activities such as those that constitute bullfighting.

Today, most of the Spanish society is ashamed of a concept of culture and traditions based on animal abuse. However, due to the endeavor of these governments, around 18,000 bullfighting events and festivities, which involve extreme violence over animals, are still held each year, against which Spanish children and girls are totally unprotected.

Given the territorial organization of the State, there is both national and regional regulation.

### National Regulation

Law 10/1991 of April 4 on administrative powers in matters of bullfighting events and Royal Decree 145/1996 of February 2, which amends and gives new wording to the Bullfighting Events Regulation, establish that minors from the age of 16 can register in the General Registry of Bullfighting Professionals and that from the age of 14 they can participate in practical classes. However, they do not set a minimum age either to be a student of a bullfighting school or to attend or participate in bullfighting events and festivities.

### Regional Regulation

Regarding registration in bullfighting schools: Only three of the seventeen regions have established a minimum age (Andalusia 10 years; Aragon and Basque Country 12 years).

Regarding practical classes with cattle: In all regions, from the age of 14, minors can participate in these classes, which use weapons such as *puyas* (sharp steel-tipped rods), *banderillas* (metal harpoons), *estoques* (swords), or *puntillas* (daggers) to wound and kill the animals.

Regarding participation in bullfighting festivities: Only one region (Cantabria) prohibits the participation of minors. In the rest, they can participate from the age of 16, and in some even from the age of 14.

Regarding attendance as spectators: Only one region (Balearic Islands) had prohibited minors' attendance. Unfortunately, the new regional government has agreed to amend the regulation so that those over 16 can attend again. In another region (Galicia), it is prohibited for those under 12. In the rest, any minor of any age can attend these events.

However, this regulation is not even being respected. Although the national regulation sets 16 as the minimum age to register in the Registry of Bullfighting Professionals and therefore to participate as bullfighters, it is common to see minors aged 14 or 15 participating, being their participation disguised as practical classes. For example, this bullfighting festival in which a 15-year-old student participates by bullfighting and killing a calf ([link](#)). At the end, as is traditional, the ears and tail of the calf were cut off so that the child could parade around the ring holding them as trophies while receiving applause from the audience:



We have covered his eyes, but the videos and photos of this child bullfighting and killing the animal were published in many Spanish newspapers, like those of so many other children who are used in these shows.

Just a few days ago, already at 16 and as a *novillero* (bullfighter who fights young bulls), he was starring on the covers after having been caught twice:



According to reports on a bullfighting portal ([link](#)), he suffered a “horrible” seizure when the bull ran over him, violently hitting him against the ground and hitting him in the buttock area. Despite the injuries, they allowed him to continue bullfighting, suffering a second catch:



One of the images that the media has published, without covering his face and mentioning his first and last name in the headlines:



This happens despite Organic Law 1/1996 of January 15 on the legal protection of minors establishing in Article 3 that they will enjoy the rights recognized by the Constitution and the International Treaties to which Spain is a party, especially the Convention, and that all legal provisions relating to minors must be interpreted in accordance with it, adding that public authorities must ensure the respect of these rights and adapt their actions to the aforementioned regulation.

Article 11 includes among the guiding principles of public authorities' actions in relation to minors the protection against all forms of violence, including violence in the social or educational sphere.

The Convention is mandatory and binding without the need for implementing legislation in Spain since the Constitution establishes that validly concluded and published international treaties form part of the internal legal order.

Article 24.3 establishes that “States Parties shall take all effective and appropriate measures with a view to abolishing traditional practices prejudicial to the health of children”.

The Committee has expressly expressed itself on several occasions regarding bullfighting as a violent activity from which children need to be protected. Specifically, after examining Spain's reports in 2018, it included the following recommendation among the final observations under the heading III on "Main areas of concern and recommendations":

“E.Violence against children (arts. 19, 24 (3), 28 (2), 34, 37 (a) and 39)

### Bullfighting

25. In order to prevent the harmful effects of bullfighting on children, the Committee recommends that the State party prohibit the participation of children under 18 years of age as bullfighters and as spectators in bullfighting events.”.

However, the Spanish Government deliberately ignored this recommendation when drafting Organic Law 8/2021 of June 4 on the comprehensive protection of children and adolescents against violence, which does not make a single mention of their exposure to and participation in the most violent traditions that take place in Spain, despite the fact that numerous entities and professional associations dedicated to child protection requested the inclusion of the Committee's recommendation.

But not only does the national government contravene the Convention and the Committee's recommendations. Faced with the evident decline of bullfighting, we are witnessing an increase in activities promoted or organized by regional and local governments aimed at attracting and initiating younger and younger children. Here are some examples:

- Invitations to minors to bullfighting shows: the company Pagés, which manages the Seville Bullring, invites students from several schools ([link](#)) and conducts campaigns where children under 8 can attend for free ([link](#)).

- Children's boxes: several bullrings have children's boxes, such as in Valencia, organized by the company managing the bullring (Nautalia) and the Provincial Council, with free admission to encourage children's attendance at bullfighting events ([link](#)):



- Organization of children's bull runs:



- Organization of children's bullfighting camps:



Classes about bullfighting are even being held in schools for primary school children (under 12 years old):



El novillero Mario Navas dando a conocer la tauromaquia a los más pequeños en Simancas

## Los niños conocen la tauromaquia en un colegio de Simancas

El novillero Mario Navas y el cortador Dany Alonso llevan la tauromaquia a un colegio de Simancas de la mano de Tauroemoción

27 marzo, 2024 - 13:29



LO PÚBLICO - SEVILLA - SOCIEDAD

## Tauromaquia en aulas públicas andaluzas: un colegio público de Camas (Sevilla) organiza una jornada teórica y práctica de toreo para niños de Infantil y Primaria

CRISTIAN LÓPEZ DOMÍNGUEZ

La tauromaquia vuelve a colarse nuevamente en aulas públicas en Andalucía. El colegio Juan Rodríguez Berrocal de la localidad sevillana de Camas, un centro público de Infantil y Primaria, decidió organizar el pasado 21 de febrero, días antes de la

News about workshops held in March at the Los Zumacales Primary School (Simancas) to introduce their students to bullfighting, and the days organized in February by the Juan Rodríguez Berrocal Primary School (Camas) where a bullfighter gave theoretical and practical classes.

At the Marista Nuestra Señora del Carmen School in Badajoz, classes were held for kindergarten children (under 6 years old):





According to its website, the school is certified in "Level 1 on Institutional Child Protection" by the association Keeping Children Safe, which accredits that it complies with the responsibilities established in the Convention to protect children from harm caused by its staff and activities.

Recently, the schools Highlands School, Colegio Europa, Colegio de Fomento Entreolivos, Colegio Altasierra, Colegio de Fomento Tabladilla, and Yago School in Seville took more than 1,000 students to bullfighting classes ([link](#)). In this annual workshop, children are taught to use different weapons against animals:



These activities have the support of local and regional governments, which provide facilities, grant subsidies for their development, or are directly organized by public institutions such as the Provincial Council of Almería, which organized a series of workshops this summer with eight local governments ([link](#)):



# TALLERES DE TAUROMAQUIA 2024

## JUGANDO AL TORO Y EXHIBICIÓN DE TORO DE SALÓN



### JULIO

12 - Tíjola

"La Estación" de Tíjola / 20:00h

24 - Agua Amarga

Plaza de Agua Amarga / 20:00h.

### SEPTIEMBRE

2 - Alcolea

Plaza del Ayuntamiento / 18:30h.

7 - Berja

Paseo de Cervantes / 10:30h.

22 - Laujar de Andarax

Plaza de Las Alpujarras / 13:00h

### OCTUBRE

5 - Macael

Plaza de la Juventud / 12:00h

9 - Gádor

Plaza de La Constitución / 17:00h

20 - Huércal Overa

Recinto Ferial / 17:00h.



Another shocking image came from the town of Azuqueca de Henares, Guadalajara. After the event, they parade the impaled carcass of the tortured animal through the streets, and we can see minors watching the horrific scene:



We must not only regret that minors' mental, moral, and social integrity is at risk but also their physical integrity. Below are some headlines with links to news about minors who have been injured:

PACMA

secretaria@pacma.es

Calle Mayor nº6, planta 2ª, oficina 8. 28013 Madrid

- [A twelve-year-old boy is in the ICU after being gored in Puçol](#)
- [A 16-year-old boy is in the ICU after suffering a severe goring at 'bous al carrer' in Calp](#)
- [A 16-year-old girl among the six injured in the first running of the bulls in San Fermín](#)
- [A 15-year-old boy operated on after a severe goring in the bullfighting festivities of Gilet](#)
- [Two minors injured, one seriously, after being gored at 'bous al carrer' in Calpe and Sagunto](#)
- [A 16-year-old boy injured in the heifers of a town in Zaragoza](#)
- [A minor injured in the running of the bulls in Calahorra](#)
- [A minor gored in the running of the bulls in Rincón de Soto](#)

Numerous studies on the negative consequences of minors' participation in and exposure to violent activities warn that viewing violence as entertainment can lead to increased aggressive attitudes, values, and behaviors, and that minors who observe a lot of violence tend to become indifferent to it, consider it normal, acceptable, and legitimate.

Bullfighting is not only a terrible exhibition of extreme and explicit violence but also involves elements of celebration and glorification of it.

Despite this, in 2023, the Spanish Government responded to a senator's question about whether it planned to comply with the Committee's recommendation to prohibit minors' attendance and participation by shamelessly stating that ([link](#)):

"(...) it cannot be asserted that the international regulations for the protection of minors ratified by Spain, specifically the aforementioned Convention, necessarily imply the prohibition of minors' participation and attendance at bullfighting events, including bullfighting schools. (...) In any case, it should be emphasized that the Committee on the Rights of the Child, to issue its Recommendation, did not provide any report, documentation, or scientific study linking minors' attendance at bullfighting events with harmful effects on them. Therefore, from a scientific point of view, it is not proven that negative effects result for minors (...) it is worth citing the report of the Children's Ombudsman of the Community of Madrid on the possible psychological repercussions of bullfighting on children dated July 23, 1999 (...). This report concludes that "with the data currently available, it cannot be considered dangerous for children under 14 to watch bullfighting when it involves psychologically healthy children who attend these events sporadically, voluntarily, and accompanied by adults with positive attitudes towards bullfighting."

In other words, the Spanish Government, despite having a Childhood Observatory, a Directorate-General for the Rights of Children and Adolescents, a Sectoral Conference on Childhood and Adolescence, and a Ministry of Youth and Childhood, shifts the responsibility for providing a report or study on the risks and harms of minors' attendance and participation in bullfighting events to the Committee.

In the annex to the state report, a supposed link to the cited report is included, but as the Committee can verify, it does not lead to any report. In any case, we would be talking about a 1999 report. This demonstrates the Government's complete lack of concern over the past 25 years for the potential harms minors may suffer from attending and participating in bullfighting and other bullfighting festivities.

In the List of Issues, the Committee included the following question under the point "D. Violence against children," under "Harmful Practices": "20. Please provide information on steps taken to prohibit the participation of children under 18 years of age as bullfighters and as spectators in bullfighting events."

In point 8 of Spain's Seventh Periodic Report, the Government states that with the approval of Organic Law 8/2021 of June 4 on the comprehensive protection of children and adolescents against violence, "it aims to achieve uniform protection throughout the State, constituting the reference framework for the Autonomous Communities in the development of their legislation on children and incorporating the provisions of international agreements that protect their rights, especially the CRC". However, as we have already mentioned, the Law does not even contemplate minors' attendance and participation in violent events.

In point 14, it states that the Strategy for the Eradication of Violence against Children and Adolescents "aims to be the roadmap for different Administrations, entities, and actors to work together to strengthen the prevention of all forms of violence"; "raise awareness of violence against children and adolescents"; or "generate a culture of "zero tolerance" towards violence". However, we can see that the aforementioned Strategy ([link](#)) also does not consider minors' participation and attendance at violent events.

In section "IV. Violence against children", on the "Right of the child not to be subject to any form of violence" and the issue of "Minors in bullfighting events", it states:

"152. The jurisprudence of the Constitutional Court explicitly and unequivocally establishes that the competence to set the conditions for minors' attendance and/or participation in bullfighting events belongs to the Autonomous Communities.

153. Except the autonomous community of Balearics Islands, which prohibits minors under 18 from attending bullrings when bullfighting events are held, all other Autonomous Communities where bullfighting events are held, both regulated (bullfights, *rejones*, *novilladas*...) and popular festivities, allow minors to attend and/or participate in bullfighting events or bullfighting schools within their territorial scope under certain conditions."

Firstly, we emphatically deny that the jurisprudence of the Constitutional Court has established that the competence to set the conditions for minors' attendance and/or participation in bullfighting events belongs to the Autonomous Communities.

Eleven Constitutional Court rulings have referred to issues related to bullfighting events and festivities. We list them and include links so that the Committee can verify that none address the competence to set the conditions for minors' attendance and/or participation in bullfighting events or festivities, nor do they affirm that this competence exclusively belongs to the Autonomous Communities:

1. [JUDGMENT 93/2021 of May 10](#)
2. [JUDGMENT 134/2018 of December 13](#)
3. [JUDGMENT 177/2016 of October 20](#)
4. [JUDGMENT 32/2009 of February 9](#)
5. [JUDGMENT 100/2004 of June 2](#)
6. [JUDGMENT 235/2001 of December 13](#)
7. [JUDGMENT 300/1993 of October 20](#)
8. [JUDGMENT 253/1993 of July 20](#)
9. [JUDGMENT 231/1988 of December 2](#)
10. [ORDER 37/2018 of March 22](#)
11. [ORDER 206/2016 of December 13](#)

Regarding the statement in point 153, as we have explained, there is national and regional regulation. We have reflected in the following table the ages established by each:

MINIMUM AGES IN REGULATION	SPECTATOR ACCESS	BULLFIGHTING SCHOOL ACCESS	LESSONS WITH CATTLE	BULLFIGHTING FESTIVALS PARTICIPATION
STATE			14	
ANDALUSIA		10	14	16
ARAGON		12	14	16
BALEARICS	18			
CANTABRIA				18
CASTILLA LA MANCHA				16/14 bullfighting students
CASTILLA AND LEON			14	14
CATALONIA				14
MADRID'S COMMUNITY				16
NAVARRRE				16
VALENCIAN COMMUNITY				16
EXTREMADURA				18/16 bullfighting students
GALICIA	12			
BASQUE COUNTRY		12		16
PRINCIPALITY ASTURIAS				
REGION OF MURCIA				
THE RIOJA				16

The Canary Islands are not included because bullfights or popular bullfighting festivals are not held. Asturias, Galicia and Murcia do not have their own bullfighting regulations.

As we can see, national regulation does not set a minimum age for attendance as spectators, and only two communities have set one, so in the vast majority of regions, minors of any age can attend as spectators.

The same applies to being a student of a bullfighting school: the State does not set a minimum age, and only three regions have set one.

Regarding participation in practical classes with cattle, however, we see that **the State has established a minimum age of 14**, which contradicts all its arguments about not having competence for it.

This minimum age for participating in practical classes is established in [Royal Decree 145/1996 of February 2](#), which amends and gives new wording to the [Bullfighting Events Regulation](#).

Its preamble indicates that “The different bullfighting events are defined in the Regulation, **determining the necessary requirements for their celebration**”.

Regarding the competences of the Autonomous Communities, it explains that “the Regulation has been absolutely scrupulous with the provisions of statutory attributions, respecting and preserving the corresponding autonomy”.

According to its First Additional Provision, it is generally applicable throughout Spanish territory, and its Sole Repealing Provision repeals any provisions of equal or lower rank that oppose it, so no regional regulation can contradict what is established in it.

The purpose of the Regulation, according to Article 1, is “to regulate the **preparation, organization, and development of bullfighting events** and related activities **to guarantee the rights and interests of the public and all those involved**”.

It dedicates Chapter I to the **General Registry of Bullfighting Professionals**, which it creates through Article 2 in the Ministry of the Interior and structures in the following Sections: I:

Bullfighters; II: Novice bullfighters with picadors; III: Novice bullfighters without picadors; IV: Rejoneadores; V: Banderilleros and picadors; VI: Comic bullfighters; VII: Swordsmen.

Articles 6 and 7 establish that to register in Sections III and IV, respectively, **the interested party must be at least sixteen years old**. To register in Section I, a certain experience must be accredited by having been registered in Section II, and to register in Section II, in turn, in Section III, so tacitly no bullfighter can be under 16 years old.

As we can see, it is the national Regulation that creates the Registry of Bullfighting Professionals under a government ministry and **establishes the minimum age to register and therefore be a bullfighter**.

The State, therefore, not only has competence to set the minimum age to be a bullfighter but **is the one that has the competence, so to prohibit minors' participation as bullfighters in bullfighting and other bullfighting events, the Government simply have to amend this Regulation by raising the minimum age to register in any section of the Registry of Bullfighting Professionals to 18 years**.

Furthermore, this Regulation dedicates Title VIII to regulating **bullfighting schools**.

Article 92 establishes the requirements for their creation and establishment, including their registration in the Registry of Bullfighting Schools of the Ministry of the Interior.

Paragraph 5, which regulates "practical lessons with fighting cattle," expressly states that students who participate "**must be at least fourteen years old**".

Again, we see that the State has the competence to regulate bullfighting schools and can amend the Regulation to raise the age for participating in practical lessons to 18 years and to introduce as a requirement that students enrolling in schools must be at least 18 years old.

Regarding the **sale of season tickets and tickets** for bullfighting events, Articles 35 and 36 state that **it is subject** to the rules on public shows, protection of consumers and **the provisions of the Regulation itself**.

This means that the Government can prohibit the sale to minors under 18 years old.

All these amendments can be made by the Government through a Royal Decree, which is a general provision issued by the King at the proposal of the Prime Minister or the Council of Ministers, adopted under its regulatory power.

Additionally, Royal Decree 2816/1982 of August 27, which approves the General Police Regulations on Public Shows and Recreational Activities, that states in its preamble it "strictly adheres to the field of public safety and is therefore scrupulously respectful of the competences of the various ministerial departments, the Autonomous Communities, and local corporations", prohibits in its Article 60.1 "**the entry and stay of minors under sixteen years old in nightclubs, discotheques, dance halls, in public shows or recreation classified generically or specifically by the Ministry of Culture for those over sixteen**, and in general in any public places or establishments where their health or morality may be affected, without prejudice to other age limitations established by special regulations in matters within the competence of the various ministerial departments or, where appropriate, the Autonomous Communities."

This implies an implicit recognition that both the State and the Autonomous Communities can set age limitations and that the Ministry of Culture (which is also the competent ministry for bullfighting) can classify bullfighting events and festivities for those over a certain age, restricting access. In any case, the Government can amend this Regulation to prohibit entry and stay of minors under 18 at bullfighting events and festivities, as it does for other places or activities to minors under 16.

Regarding **competence in child protection**, [Organic Law 8/2015 of July 22 on the modification of the child and adolescent protection system](#) states that it is issued to ensure “uniform protection throughout the State, serving as a framework for the Autonomous Communities in the development of their respective child protection legislation.”.

To issue this and therefore other national regulations on child protection, its Fourth Final Provision states that it is issued under Article 81 of the Constitution, which establishes that organic laws include those relating to the development of fundamental rights and public freedoms.

The Government, therefore, has already issued regulations on child protection under Article 81 of the Constitution, considering this matter as the development of fundamental rights and public freedoms.

Similarly, [Organic Law 8/2021 of June 4 on the comprehensive protection of children and adolescents against violence](#) states in its preamble that “the fight against violence in childhood is an imperative of human rights”.

Furthermore, it adds that “the protection of minors is a priority obligation of public authorities recognized in Article 39 of the Spanish Constitution and in various international treaties”, notably the Convention, and points out as main normative references, the Observations of the Committee, stating that “Spain must promote all necessary legislative, administrative, social, and educational measures to ensure the right of the child or adolescent to develop free from any form of violence”, and that the law “avoids the operational fragmentation that previously existed, paving the way for a new paradigm of prevention and common protection throughout the State territory” favoring the “reinforcement of the involvement of all public administrations within their respective competences in a general objective such as the fight against violence against children and adolescents”.

In the first paragraph of Article 1, it establishes that its purpose is “to guarantee the fundamental rights of children and adolescents to their physical, psychological, and moral integrity against any form of violence, ensuring the free development of their personality and establishing comprehensive protection measures that include awareness, prevention, early detection, protection, and damage repair in all areas of their lives”, and in the second that “violence is understood as any action, omission, or negligent treatment that deprives minors of their rights and well-being, that threatens or interferes with their orderly physical, psychological, or social development, regardless of its form and means of commission”.

Among the general criteria, it includes in Article 4 the “prohibition of all forms of violence against children and adolescents”.

Article 24 states that public administrations shall take the necessary measures to protect minors “from processes in which the learning of violent behavior models prevails in any area where they manifest”.

Regarding competences, it states that it is issued under Article 149.1.1st, 2nd, and 18th of the Constitution, which attribute to the State exclusive competence for the regulation of basic conditions that guarantee the equality of all Spaniards in the exercise of rights and in the fulfillment of constitutional duties; under Article 149.1.29th, which attributes to the State exclusive competence over public security; and under Article 149.1.16th, which attributes to the State exclusive competence over the bases and general coordination of health. Furthermore, it authorizes the Government to issue any necessary regulations for its development.

In relation to the **State's exclusive competence over public security**, [Organic Law 4/2015 of March 30 on the protection of citizen security](#) states in its preamble that doctrine and jurisprudence have interpreted citizen security as the “activity aimed at protecting people and property and maintaining public order”.

Among its purposes, Article 3.e) establishes “**the protection of people and property with special attention to minors** and people with disabilities in need of special protection”.

[Law 10/1991 of April 4 on administrative powers in matters of bullfighting events](#) states in its preamble that “without prejudice to the competences corresponding to the Autonomous Communities in relation to bullfighting events as such shows, there is a clear connection between them and public order and citizen security, which constitute exclusive competences of the State under Article 149.1.29th of the Constitution”.

It further adds that “one of the most sensitive areas for citizen security is the reference to bull runs and other traditional bullfighting festivals held in public spaces, affecting as actors or spectators, voluntary or involuntary, all citizens without exception, so although the State clearly lacks the vocation to regulate their peculiarities since their regional or local character is indisputable, it must be present in their organization and celebration to guarantee citizen security and public order externally, avoiding disturbances to public order and directing them so that they develop properly according to the Regulation.

Thus, Article 1 establishes that the purpose of the Law is “to regulate the administrative powers related to the preparation, organization, and celebration of bullfighting events to guarantee the rights and interests of the public attending them and all those involved”.

Article 10.1 establishes that “the conditions under which rejoneo, charitable bullfighting festivals, heifer fights, comic bullfighting, and other shows shall be determined by regulation”, and in Article 10.2 that “the conditions for authorizing traditional bull runs, the release of cattle for the promotion and recreation of the fans, and the fighting of heifers shall be established to avoid accidents and damage to people and property as well as the mistreatment of cattle by participants in these festivities”.

Finally, it is noteworthy that the Government has recently presented the [Draft Organic Law for the protection of minors in digital environments](#).

Its preamble states that the digital environment “can include gender stereotypes, discriminatory or violent content, as well as false information or about unhealthy, illegal, or harmful habits of conduct or consumption”, highlighting among the associated risks and harms related to minors “the appearance of health problems both physical, psychological, and emotional, difficulties in social interaction or cognitive development problems”, as well as others related to the use of data and privacy or “**the progressive desensitization to acts of violence**”.

However, this same Government that recognizes and is concerned about the risks and harms associated with minors' access to violent content through screens not only does not care but, as we have seen, questions the risks and harms associated with minors' live attendance and participation in shows involving violence. This dissonance is probably because the Government is composed of people who, like most Spanish children, grew up in an environment that normalized this form of violence from which no one protected them, and from which they are now not protecting minors.

Regarding the competence to issue the aforementioned Draft, it is stated that it emanates “from Article 20.4 of the Spanish Constitution, which recognizes special protection for the youth and childhood, as well as from Article 39, which recognizes the right to comprehensive protection of childhood”.

Article 5 establishes that “**access to random reward mechanisms or their activation by persons under 18 years of age is prohibited**”.

It is evident that if the State can prohibit minors' access to certain content in digital environments, it can prohibit their access to certain shows based on the same competence and the same reasons.

For all the above, we propose to the Committee the following

#### QUESTIONS FOR THE DIALOGUE WITH SPAIN:

- In response to a senator's question about whether it planned to comply with the Committee's recommendations, the Government stated that it cannot be asserted that the Convention necessarily implies the prohibition of minors' participation and attendance at bullfighting events or schools. What practices does the Government consider the Convention's Article 24.3 refers to when it states that “States Parties shall take all effective and appropriate measures with a view to abolishing traditional practices prejudicial to the health of children”?

- In the same response, regarding the Committee's recommendation to prohibit minors' attendance and participation in bullfighting events, the Government stated that the Committee did not provide any report or study proving that harmful effects for minors might result. Does the Government consider that the responsibility for producing or providing these reports lies with the Committee and not with the Government itself?

- Additionally, the Government referenced a report by the Children's Ombudsman of the Community of Madrid, which concluded that it cannot be considered dangerous for children under 14 to watch bullfighting when it involves psychologically healthy children who attend these events sporadically, voluntarily, and accompanied by adults with positive attitudes towards bullfighting. How does the Government ensure that minors attending these events do so sporadically and voluntarily and are “psychologically healthy”?

- The referenced report dates back to 1999. Has the Government had no opportunity to conduct its own study over the past 25 years on the risks and harms associated with minors' attendance and participation in bullfighting events?

- The Bullfighting Events Regulation regulates the Registry of Bullfighting Professionals, setting 16 years as the minimum age for registration. It also regulates the Registry of Bullfighting Schools, setting 14 years as the minimum age to participate in practical classes. Regarding the sale of season tickets and tickets for bullfighting events, it establishes that it is subject to the provisions



of the Regulation itself. How does the Government claim that the competence to set the conditions for minors' attendance and/or participation in bullfighting events belongs to the Autonomous Communities when it has already set the minimum age for registration and therefore participation as bullfighters through the Regulation? Why does it not raise the minimum age from 16 to 18 years to register in the Registry? Why does it not raise the minimum age from 14 to 18 years to participate in bullfighting school classes? Why does it not establish a minimum age of 18 years to purchase tickets for these events?

- The General Police Regulations on Public Shows and Recreational Activities prohibit the entry and stay of minors under 16 in certain places and activities classified by the Ministry of Culture for those over 16. Why has the Government not classified bullfighting events and festivities for those over 16? Why has it not amended this Regulation to prohibit the entry and stay of minors under 18 in bullfighting events and festivities in the same way?

- The State has passed several laws on child protection under its competences for the development of fundamental rights and to regulate the basic conditions that guarantee equality for all Spaniards in the exercise of rights and in the fulfillment of constitutional duties, as well as its exclusive competences over citizen security and the general coordination of health. How is it possible that it claims not to have competence to protect minors from violent shows?

- If the Organic Law on the protection of citizen security, defined as the activity aimed at protecting people and property, establishes among its purposes the protection of people with special attention to minors, and the State having exclusive competence in this matter and having also issued the Law on administrative powers in matters of bullfighting events based on this same exclusive competence in citizen security, how is it possible that it claims not to have competence to set a minimum age for attendance and/or participation in bullfighting events regulated by this same Law?

- The Government is currently processing a Draft Organic Law for the protection of minors in digital environments, in the preamble of which it recognizes and expresses concern about the risks and harms associated with minors' access to violent content in digital environments. How is it possible that it not only does not care but questions the risks and harms associated with minors' access and participation in violent shows?

- This Draft prohibits minors' access to certain content. Why does the Government not prohibit their access to bullfighting events based on the same reasons and competence (according to the norm, Article 20.4 of the Constitution that recognizes special protection for the youth and childhood, and Article 39 that recognizes the right to comprehensive protection of childhood)?

We remain at the Committee's disposal to provide further information contained in this report if deemed appropriate. Receive our warmest regards and our gratitude for your work in protecting children.