

6 July¹²

Subject: Joint statement on potential new measures for child online safety in the European Union

Dear President von der Leyen,

Cc:

Dear Executive Vice-President Virkkunen,

Dear Executive Vice-President Ribera,

Dear Commissioner McGrath,

Dear Dr. Maria Melchior, and Professor Jörg M. Fegert, Co-chairs of the Special Panel on *Child safety online and potential age limits for social media and other online services in Europe*,

Madam President,

We are writing to you as more than 170 organisations and experts working across child rights, digital rights, families and mental health, including members of the EU Coalition for Children's Rights Online.

We greatly appreciate your clear recognition of the exploitative business models that underpin digital services including social media and gaming as the cause of harm to children, as set out in your speech of 12 May 2026. We welcome your commitment to deliver meaningful answers to the challenges faced by children and families today, including by means of a potential new legislative proposal.

As you consider how to effectively strengthen and expand the EU's rulebook to this end, we urge you to steer away from a blanket age-based "social media ban" or "delay" targeting children. Instead, we call upon you to ensure the **EU's approach respects and upholds children's rights and evolving capacities, that it remains technologically neutral, and places strict, legal accountability on providers to make their services and products safe and private by design and by default. Restrictions can play an important role, but they must be on high-risk features and functionalities and be age-appropriate.**

Under the **UN Convention on the Rights of the Child (UNCRC)** and its **General comment No. 25, a child is anyone under 18**. All children, including the more vulnerable³, are entitled to specific rights and protections until they reach that age. These protections apply equally online as offline, and must be cognisant of children's evolving capacities, gradually empowering them with more autonomy as they grow. Online safety and protection must be achieved while preserving children's rights to information,

² The letter was originally published on 12 June, then updated to integrate new signatories.

³ Children do not experience the digital environment equally. Children in vulnerable situations, including those facing poverty, discrimination, with disabilities, without parental care, with a migrant background, from ethnic minority origin, may face heightened risks online while also relying on digital spaces for reaching out to their communities and seeking support.

participation, education, and play, among others. **Children's rights apply across the entire digital ecosystem.** Social media, but also online gaming, artificial intelligence systems (including generative AI, chatbots and companions), education technologies and other emerging products and services must all be rights-respecting and age-appropriate. All digital services providers must be held accountable for ensuring their services provide a high level of privacy, safety and security for all minors by design and by default.

Imposing a blanket “social media ban” by defining a new legal age threshold to access specific services, would fall short of these fundamental principles. It would leave children unprotected in other equally problematic online spaces and encourage their migration to unregulated services. It could curtail the access of younger children to spaces and services that could benefit them and deny older teenagers the age-appropriate safeguards they also need and deserve in the digital world. Moreover, an access ban on children would discourage action to address the business models and toxic design choices of services that drive risks and harms, such as behavioural profiling, addictive and manipulative design, recommender systems that amplify harmful content, and commercial practices that exploit children's data, attention and vulnerabilities. Children accessing services in spite of a ban would be particularly vulnerable. Such an approach ultimately shifts the burden away from technology providers and risks entrenching harm to children.

Rather than banning children from accessing specific categories of services, the EU must ensure that all services accessible to children meet a high bar of age-appropriate design, effectively banning harmful features and functionalities, and curtailing children's access to services as a whole that fail to pass muster. Such a tech-neutral, ex-ante, pre-certification requirement would both protect children and drive a market for rights-respecting technology.

To that end, **we call on the EU and its Member States to refrain from imposing restrictions on children or setting a “digital age of majority”, and instead to complement, strengthen and extend the scope of the EU digital rulebook⁴ to protect minors online, by:**

- **Robustly enforcing existing GDPR provisions designed to protect children from data-driven commercial exploitation. Clarifying that the personal data of under 13s should in principle not be processed to provide them with personal services.⁵**
- **Establishing clear criteria for service risk assessment and pre-certification for access to children.** While dark patterns and the most egregious practices should be prohibited outright, graduated access and safeguard requirements⁶ protect children from spaces, features, functionalities and content that are unsuitable for

⁴ Notably, the General Data Protection Regulation (GDPR), the Digital Services Act (DSA), along with its Guidelines on Protection of Minors pursuant to Article 28(1), the Audiovisual Media Services Directive (AVMSD), and the Artificial Intelligence Act (AIA).

⁵ Exceptions for personalised services that have proven to deliver benefits to children in line with their rights (e.g. to play or education) must be governed by robust regulatory safeguards and conformity with technical standards.

⁶ Positive safeguards can include age-appropriate transparency and reinforced consent, warnings, strengthened reporting and redress mechanisms, etc. All services accessible to children should ensure easy and age-appropriate access to helpline services.

their age, in line with established paediatric developmental milestones. The EU framework should be updated to mandate independent ex-ante risk assessment⁷, age-tiered child safety pre-certification and regular independent auditing for all services accessible to children.

- **Supporting online and offline alternatives for children.** Protecting children from harm must go hand in hand with empowering them to thrive in a hybrid world. It is the duty of the EU and its Member States to enable children's full enjoyment of their rights. This includes access to digital services built to support their development, high quality and age-appropriate online content, safe community spaces, offline mental health support and recreational activities.
- **Ensuring a coherent and effective application of EU rules.** The consideration of a new legal instrument is an opportunity to address legislative gaps and ensure a strong, comprehensive and futureproof baseline of protection covering all digital products and services, large or small, including AI and emerging technologies. It is also an opportunity to strengthen and harmonise enforcement structures, with increased centralisation or avenues for rapid escalation to the EU level, as well as a clear mandating of market access restrictions and director liability in cases of non-compliance.

Madam President,

Recent polling has made clear that Europeans recognise the nature of the problem and expect their leaders to deliver meaningful solutions. While between two-thirds and three-quarters of adults say they would support age limits, they also consistently doubt bans will work. On the other hand, when asked about requiring companies to prove services are safe before use, an even bigger majority say they would support and think such an approach would keep everyone safe.

Age-based restrictions are part of the answer, but to be both rights-respecting and effective, they must clearly drive towards age -appropriate design and be imposed on the appropriate subject – in this case tech companies, not children. By implementing a strict “safety by design” prerequisite paired with privacy preserving and robust age assurance, the EU will truly deliver on its promise to ensure that children are protected from unsafe and exploitative practices, and that their fundamental rights are respected and upheld in the digital age.

Yours respectfully,

Signatories:

Organisations

1. 5Rights Foundation
2. AI Safety Connect

⁷ Including a Child Rights Impact Assessment.

3. All-Ukrainian Public Center "Volunteer"
4. Arbeitsgemeinschaft für Kinder- und Jugendhilfe - AGJ
5. Ariel Foundation International
6. Association "Novi put"
7. Association e-Enfance / 3018
8. Azerbaijan Child Helpline Service
9. Bibliothèques sans frontière Belgique
10. Breza Association
11. Bris, Children's Rights in Society
12. Bruxelles-J
13. Center for Missing and Exploited Children Croatia
14. Centre for Digital Ethics
15. Charity Foundation "Dream to Live"
16. Child Focus
17. Child Helpline International
18. Child Rights Information Center Moldova (CRIC)
19. ChildFund Alliance
20. Children's Rights Alliance, Ireland
21. COFACE Families Europe
22. Consiliul Tinerilor Instituționalizați
23. CRCA-ECPAT Albania
24. CyberSafeKids
25. De Ambrassade
26. De Stroom vzw
27. Defend Digital Me
28. Défense des Enfants - ECPAT Belgique

29. Digihumanism - Centre for AI & Digital Humanism
- 30.digiQ
31. Digital Intimacy Coalition
32. Dutch Expertise Centre for Digitalisation and Wellbeing at the Trimbos Institute
33. Dutch NGO Coalition for Children's Rights | Kinderrechtencollectief
34. Ecpat Sweden
35. Equitat.org
36. Estonian Union for Child Welfare
37. EU Kids Online Research Network
38. Eurochild
39. Euroconsumers
40. eWorldwide Group
41. EXEA IMPACT
42. Family for Every Child
43. Federació d'Entitats d'Atenció a la Infància i l'Adolescència (FEDAIA)
44. Fondazione SOS - il Telefono Azzurro ETS
45. Fundación ANAR
46. German Children's Fund/Deutsches Kinderhilfswerk e.V.
47. Gezinsbond
48. HateAid
49. Higher Council for Media Literacy (Conseil supérieur de l'éducation aux médias) – Ministry of the French Community of Belgium
50. Homo Digitalis
51. Hrabri telefon (Brave phone)
52. IFSW Europe – International Federation of Social Workers
53. Innocence en Danger
54. Instituto de Apoio à Criança
55. International Child Development Initiatives - ICDI

56. Irish Internet Hotline
57. Irish Society for the Prevention of Cruelty to Children (ISPCC)
58. JEF
59. JFF - Institut für Medienpädagogik in Forschung und Praxis
60. Katholiek Basisonderwijs Harelbeke
61. klicksafe
62. KMOP Greece
63. La Strada-Ukraine
64. Link in de Kabel vzw
65. Média Animation
66. Mediavista
67. Mediawijs
68. Mental Health Europe
69. Missing Children Europe
70. Netwerk Kinderrechten (STEKR)
71. Netwerk Mediawijsheid
72. Network for Children's Rights (Greece)
73. New School of the Anthropocene
74. Offlimits
75. One in Four Ireland
76. Online Safety Expert Group (OSEG)
77. Panoptikon Foundation
78. People vs Big Tech
79. Plan International
80. Rat der deutschsprachigen Jugend
81. Save the Children
82. Slovenian Association of Friends of Youth

83. Solidarity and Action for Youth Association
84. Chair for Socially Responsible Digital Innovation (SoReDI, ESADE-URL)
85. SOS Children's Villages International
86. State Commission for Counteracting the Sexual Abuse of Minors under the age of 15, Poland
87. Stiftung Digitale Chancen | Digital Opportunities Foundation Germany
88. Terre des Hommes Netherlands
89. The German Child Protection Association (Der Kinderschutzbund Bundesverband)
90. ThinkOnception Education Hub, Greece
91. The Smile of the Child, Greece
92. Together (Scottish Alliance for Children's Rights)
93. To Zero
94. Tulip Foundation
95. Vlaamse Jeugdraad
96. VsCyberH
97. WHAT TO FIX
98. Wikimedia Europe
99. Zemberek Technology Arts and Learning Association

Experts

- | | |
|-------------------------|---|
| 1. Alex Cooney | Founder and CEO, CyberSafeKids |
| 2. Ali Hessami | Professor and Director of Vega Systems |
| 3. Alona Kryvuliak | Coordinator, National Toll-Free Hot Line for Children and Youth, La Strada-Ukraine |
| 4. Altin Hazizaj | Executive Director, CRCA-ECPAT Albania |
| 5. Andra Siibak | Professor of Media Studies and Deputy Head of Research and Development, University of Tartu |
| 6. Anne Mette Thorhauge | Associate Professor, University of Copenhagen |

7. Antonia Torrens	President of COFACE Families Europe & Director of KMOP in Greece
8. Ariel Rosita King	Humanitarian Leader, Author, and Global Advocate
9. Beckett LeClair	Chair of IEEE Standard P2089.4 - AI Systems Impacting Children
10. Brian O'Neill	Emeritus Research Fellow, Technological University Dublin
11. David de Segovia	Postdoctoral Researcher, imec-mict, Ugent
12. Denia Psarrou	Program Director, IEEE SA
13. Efthymia Laska	Entrepreneur in the field of education and culture
14. Elisabeth Staksrud	Professor, Director of the Center for Studies of Children, Youth and Media, University of Oslo and Coordinator EU Kids Online Research Network
15. Elisabeth Van Gulck	Prevention Operator and Project Manager, Child Focus
16. Emma Aldibs	PhD Researcher at CiTiP, KUL
17. Ernesto Caffo	President, S.O.S. - Telefono Azzurro
18. Evy De Weghe	Expert E-commerce at an Federal Public Service
19. Fiona Jennings	Head of Policy and Public Affairs, ISPPC
20. Florence Biesemans	Case Manager, Child Focus Belgium
21. Gareth Williams-James	Individual Member of Eurochild
22. Gilles Fayad	Director initiatives, AI Commons
23. Giovanna Mascheroni	Professor of Sociology of Digital Media, Università Cattolica del Sacro Cuore and EU Kids Online
24. Hana Hrpka	Psychologist and President of Hrabri telefon (Brave phone)
25. Helen Mason	Executive Director, Child Helpline International
26. Hodayra Sellier	President and Founder of Innocence en Danger
27. Ike Picone	Associate Professor, Vrije Universiteit Brussel
28. Ingrida Milkaite	Postdoctoral Researcher at VUB & Voluntary Postdoctoral Researcher at Ghent University, Belgium
29. Iryna Popovska	Founder, "I Dream to Live" Foundation

30. Ivan Ćaleta	Head of Safer Internet Centre (Center for Missing and Exploited Children)
31. James O'Higgins Norman	Professor of Education and Society, UNESCO Chair on Bullying and Cyberbullying, Director of DCU Anti-Bullying Centre
32. Jessica Galissaire	Senior Policy Researcher, Interface
33. Jessica Taylor Piotrowski	Professor, University of Amsterdam
34. Jutta Croll	Chairwoman of the Board, Stiftung Digitale Chancen
35. Kai Rannenberg	Prof. Dr. Chair of Mobile Business & Multilateral Security, Goethe University Frankfurt
36. Kamala Ashumova	Head of the Public Union Reliable Future (Ümidli Gələcək)
37. Konstantinos Karachalios	Strategy Advisor to IEEE Executive Director, President of Greece's National Scientific Council on Political and Social Issues of Technology
38. Kostas Karpouzis	Associate professor, Panteion University of Social and Political Sciences, Greece
39. Lara Schreurs	Assistant Professor - Media Psychology Lab, KU Leuven
40. Laura Leroux	Beleidsmedewerker Veiligheid, Stad Aalst
41. Leanda Barrington-Leach	Executive Director, 5Rights Foundation
42. Liliana Arroyo Moliner	Director of SoReDI, Assistant Professor at Esade Business School - Universitat Ramon Llull
43. Maarten Van Mol	Doctoral Researcher, KU Leuven Institute for Family Law and Juvenile Law
44. Maria Petkova	Director, Tulip Foundation
45. Maria Soledad Pera	Associate Professor, TU Delft
46. Marie Goffin	Child Focus - Volunteer Expert
47. Mariek Vanden Abeele	Associate Professor in Digital Culture, Ghent University, Belgium
48. Marietta Karamanli	Députée de la Sarthe
49. Marjin Martens	Researcher, imec-mict-UGent, Ghent University
50. Maryna Legenka	President, La Strada-Ukraine

51. Mathieu Verschraege	Founder - Managing Director, Mediavista
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54. Mieke Schuurman	Director of Child Rights & Capacity Building at Eurochild
55. Nastasia Griffioen	Head of the Dutch Expertise Centre for Digitalisation and Wellbeing at the Trimbos Institute
56. Nicolas Mialhe	Co-Founder, AI Safety Connect
57. Pașcanu Fernando	Prim-vicepresedintele, Consiliul Tinerilor Instituționalizați
58. Pavlos Kavouras	Professor Emeritus, National and Kapodistrian University of Athens
59. Raymond Amumpaire	Digital Rights Expert
60. Rebecca Wald	Communication Scientist and Expert on Growing Up and Raising Children Online
61. Sabine Saliba	Eurochild Secretary General
62. Salma Abbasi	Chairperson and CEO, eWorldwide Group
63. Shana Vandekerckhove	Digital youth worker for special needs children, teens and adolescents - De Stroom vzw
64. Sif Vik	Youth Participation Expert, Tromsø, Norway
65. Simone van der Hof	Professor of Law and Digital Technologies, Leiden University
66. Sofia Eleftheria Gonida	Professor of Educational Psychology and Human Development, School of Psychology, Aristotle University of Thessaloniki, Greece
67. Sonia Livingstone	Professor of Social Psychology at LSE, Director of the Digital Futures for Children Centre, and Management Group of EU Kids Online
68. Sophie Stalla-Bourdillon	Co-Director of the Brussels Privacy Hub, VUB
69. Tanya Perelmuter	Co-founder, Fondation Abeona
70. Theodoros Evgeniou	Professor, INSEAD
71. Tom De Leyn	Professor, School of Social Sciences UHasselt

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| 72. Tom Van Daele | Research Coordinator, Psychology and Technology,
Thomas More University of Applied Sciences |
| 73. Verónica Donoso | Researcher Media Culture & Policy Lab, KU Leuven |
| 74. Véronique Lerch | Independent Human Rights Consultant |