

12 June 2026

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 140 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 vulnerable¹, 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, 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

¹ 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.

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 rulebook² 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.³**
- **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 requirements⁴ protect children from spaces, features, functionalities and content that are unsuitable for their age, in line with established paediatric developmental milestones. The EU framework should be updated to mandate independent ex-ante risk assessment⁵, age-tiered child safety pre-certification and regular independent auditing for all services accessible to children.

² 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).

³ 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.

⁴ 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.

⁵ Including a Child Rights Impact Assessment.

- **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
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. Breza Association
10. Bris, Children's Rights in Society
11. Bruxelles-J
12. Center for Missing and Exploited Children Croatia
13. Charity Foundation "Dream to Live"
14. Child Focus
15. Child Helpline International
16. ChildFund Alliance
17. Children's Rights Alliance, Ireland
18. COFACE Families Europe
19. Consiliul Tinerilor Instituționalizați
20. CRCA-ECPAT Albania
21. CyberSafeKids
22. De Ambrassade
23. De Stroom vzw
24. Defend Digital Me
25. digiQ
26. Digital Intimacy Coalition
27. Dutch NGO Coalition for Children's Rights | Kinderrechtencollectief
28. Ecpat Sweden
29. Equitat.org
30. Estonian Union for Child Welfare
31. EU Kids Online Research Network

32. Eurochild
33. Euroconsumers
34. EXEA IMPACT
35. Federació d'Entitats d'Atenció a la Infància i l'Adolescència (FEDAIA)
36. Fondazione SOS - il Telefono Azzurro ETS
37. Fundación ANAR
38. German Children's Fund/Deutsches Kinderhilfswerk e.V.
39. Gezinsbond
40. HateAid
41. Higher Council for Media Literacy (Conseil supérieur de l'éducation aux médias) – Ministry of the French Community of Belgium
42. Homo Digitalis
43. Hrabri telefon (Brave phone)
44. IFSW Europe – International Federation of Social Workers
45. Innocence en Danger
46. Instituto de Apoio à Criança
47. International Child Development Initiatives - ICDI
48. Irish Society for the Prevention of Cruelty to Children (ISPCC)
49. JEF
50. Katholiek Basisonderwijs Harelbeke
51. Klicksafe
52. KMOP Greece
53. Link in de Kabel vzw
54. Média Animation
55. Mediavista
56. Mediawijs
57. Mental Health Europe

58. Missing Children Europe
59. Netwerk Kinderrechten (STEKR)
60. Netwerk Mediawijsheid
61. Network for Children's Rights (Greece)
62. New School of the Anthropocene
63. Offlimits
64. Panoptikon Foundation
65. People vs Big Tech
66. Save the Children
67. Slovenian Association of Friends of Youth
68. Solidarity and Action for Youth Association
69. Chair for Socially Responsible Digital Innovation (SoReDI, ESADE-URL)
70. SOS Children's Villages International
71. Terre des Hommes Netherlands
72. ThinkOnception Education Hub, Greece
73. The Smile of the Child, Greece
74. Together (Scottish Alliance for Children's Rights)
75. Vlaamse Jeugdraad
76. VsCyberH
77. WHAT TO FIX
78. Wikimedia Europe
79. Zemberek Technology Arts and Learning Association

Experts

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5. Antonia Torrens	President of COFACE Families Europe & Director of KMOP in Greece
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18. Florence Biesemans	Case Manager, Child Focus Belgium
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22. Hana Hrpka	Psychologist and President of Hrabri telefon (Brave phone)
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24. Homayra Sellier	President and Founder of Innocence en Danger
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27. Iryna Popovska	Founder, “I Dream to Live” Foundation
28. Ivan Čaleta	Head of Safer Internet Centre (Center for Missing and Exploited Children)
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40. Mariek Vanden Abeele	Associate Professor in Digital Culture, Ghent University, Belgium
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48. Raymond Amumpaire	Digital Rights Expert

49. Rebecca Wald	Communication Scientist and Expert on Growing Up and Raising Children Online
50. Sabine Saliba	Eurochild Secretary General
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