ONE QUESTION, TWENTY-SEVEN ANSWERS

How Europe is regulating minors online, and what the EU Kids Act should fix

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Table of Contents

About the authors **4**

Summary **6**

Introduction **8**

The regulatory landscape **11**

Analytical framework: proportionality, parental choice, and the test of evidence **16**

Key findings **18**

Assessment of the Commission's proposal **31**

Policy recommendations **33**

Conclusion: protection by design, not by exclusion **35**

Appendix A: The EPICENTER tracker **36**

References **47**

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Summary

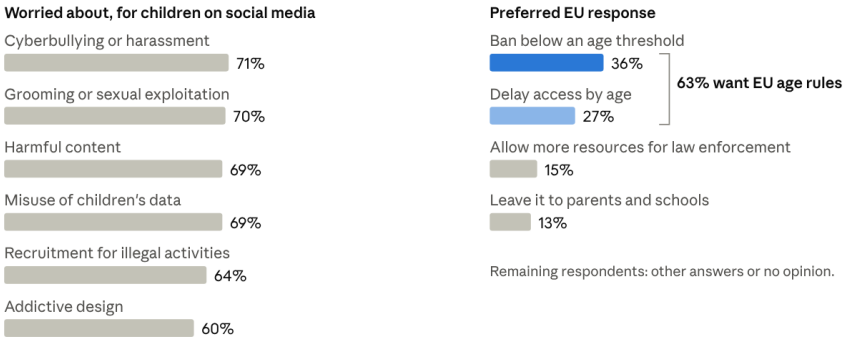
- Protecting children online is a legitimate objective with broad public support: 63% of Europeans want EU rules restricting children's access to social media by age. Yet the Union is pursuing it through a patchwork of national initiatives. By October 2026, 23 of the 27 member states had an initiative, with proposed minimum ages ranging from 13 to 16 years, but none had a limit in force: France's ban was struck down by its Constitutional Council, and Spain's bill lapsed when its parliament was dissolved.
- On 17 September 2026, the European Commission proposed the EU Kids Act, which would replace the patchwork with a single, fully harmonised access age of 15. In this paper, we welcome harmonisation but argue that several of the proposal's mechanisms are poorly matched to the risks it seeks to address.
- The evidence suggests that blanket access bans are hard to defend in court and easy to evade. In an independent survey of 1,050 Australian 12- to 15-year-olds, three months into the under-16 ban, 54% still had an account on at least one restricted platform, and many reported using gaming and messaging services outside the law's reach more often. Critics, from children's rights organisations to youth councils, also argue that bans restrict children's rights and leave platform design untouched.
- Age verification carries costs of its own. Even the most privacy-conscious design starts with an identity document, a bank card, or a face scan; 11 of the 23 national initiatives do not say how age will be checked; and the fixed cost of verification falls hardest on small firms, which risks entrenching the very platforms the rules target.
- We recommend keeping one harmonised age aligned with EU data protection rules, verifying age once and privately rather than separately for every service, targeting risky functions rather than common features,

leaving time limits to parents, treating comparable services alike, and giving small firms a proportionate regime and a realistic transition.

Introduction

Concern about children's safety online is widespread and legitimate. In Flash Eurobarometer 584, an online survey conducted by the European Commission in June 2026, 71% of Europeans said they were worried about cyberbullying of children on social media, 70% about grooming, and 69% about harmful content. Asked what the EU should do, 63% wanted rules restricting children's access to social media by age, although only 36% favoured an outright ban below a threshold (Figure 1).[1] In the Digital Decade survey, 92% said that protecting children online should be an EU priority (European Commission 2026c).

Figure 1. What Europeans want: concerns and preferred EU response



Source: European Commission (2026b)

1 'Flash Eurobarometer 584: Europeans call for stronger action on children's online safety, democratic resilience, defence, and the energy transition', European Commission, press release IP/26/1589, 13 July 2026 (https://ec.europa.eu/commission/presscorner/detail/en/ip_26_1589).

These surveys, however, measure the goal, not the price. They do not ask whether citizens would show an identity document to open an account, or accept their child losing one. Where the Commission's own survey asks about effectiveness, support is weaker: In a separate survey of more than 26,000 teenagers and 12,000 parents, only 54% of parents and 45% of teenagers aged 13 to 18 (the survey's own age band) thought that delaying access would work (European Commission 2026b).

Similarly, EU institutions recognise that something should be done but do not necessarily agree on what. On 26 November 2025, the European Parliament (EP) adopted, by 483 votes to 92 with 86 abstentions, a resolution calling for a harmonised digital minimum age of 16 years, with access from 13 with parental authorisation, and for bans on infinite scrolling, autoplay, and loot boxes (European Parliament 2025). On 13 July 2026, the European Commission's Special Panel on Child Safety Online, co-chaired by J. M. Fegert and M. Melchior, recommended harmonised restriction only for children under 13, services that are 'safe by default' for teenagers, proportionate age assurance without identity documents or biometrics, and placing the burden of proof on providers (European Commission 2026a). Two months later, on 17 September 2026, the Commission proposed the EU Kids Act, with 15 as the access age (European Commission 2026g).

This proposal arrives at a moment of tension within the Commission's broader agenda. The second von der Leyen Commission has built much of its identity around simplification, promising to reduce administrative burdens for businesses by 25% overall and by 35% for small and medium-sized enterprises.[2] The Kids Act moves in the opposite direction: It introduces new obligations for social networks, video-sharing platforms, online games, app stores, operating systems, and artificial intelligence (AI) chatbots, with no general exemption for small firms.

In this paper, we evaluate both national and EU-level rules restricting children's online access against their stated objective: Will they make children safer online, and at what cost to children, families, users, and companies? We do not dispute that some online services pose real risks to minors. Instead, we argue that blanket access bans and identity-based verification are poorly matched to those risks, and we offer recommendations

2 'An EU compass to regain competitiveness and secure sustainable prosperity', European Commission, press release IP/25/339, 29 January 2025 (https://ec.europa.eu/commission/presscorner/detail/en/ip_25_339).

for a common standard that protects children without concentrating the market. As the Kids Act is at an early stage, with the EP's lead committee only beginning its work (European Parliament 2026), its provisions may change as it progresses through the EP and the Council of the EU.

The regulatory landscape

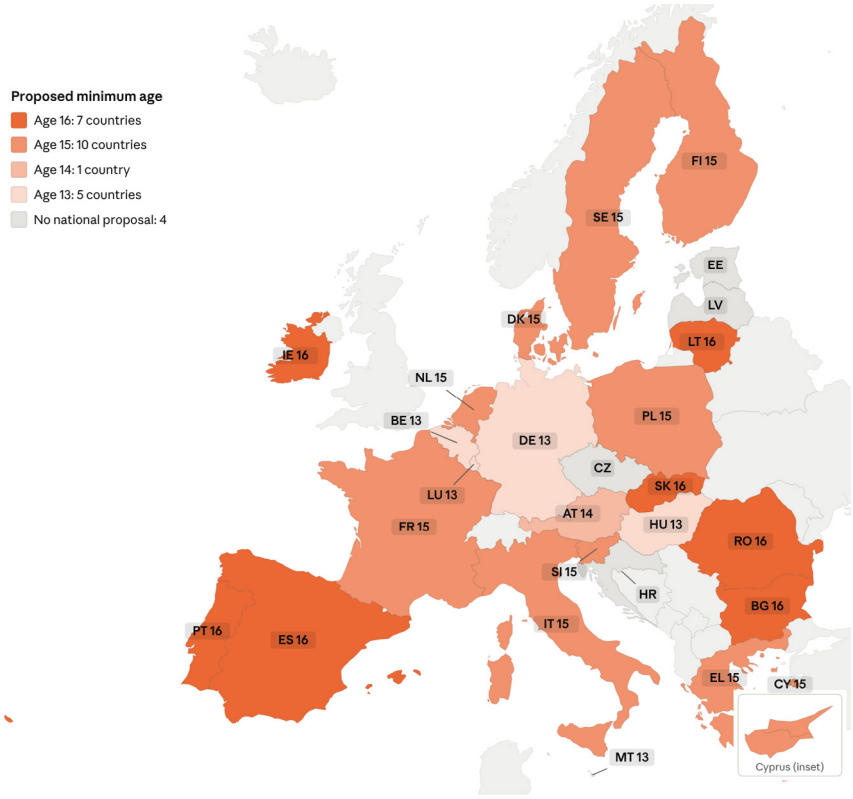
Two levels of regulation are now in play: national initiatives in 23 member states and the Commission's proposed EU Kids Act.

National initiatives: 27 answers

The EPICENTER tracker records the stage each member state has reached, from public debate or outright government opposition to a law in force (see Figure A1 in Appendix A). Its first finding is that the top stage is empty: No member state has a social media age limit in force. The second is that the proposals disagree on almost everything. Of the 23 initiatives, counting government announcements and floated proposals as well as bills, five set the age limit at 13 years, one at 14, ten at 15, and seven at 16 (Figure 2 and Table A1).[3] Some allow parents to consent below the age limit, while others forbid it. Some also cover video-sharing platforms, games, or messaging, while others include only social networks.

3 Ages are given as the age a child must have reached. 'Under-16s' are children who have not yet turned 16, and ranges such as '13- to 15-year-olds' include both ends, that is, children aged 13, 14, or 15. Where a source uses its own age band, as the Commission's survey of 13- to 18-year-olds does, we keep the source's wording.

Figure 2. Proposed minimum age for social media accounts across the EU-27, October 2026



Notes: Belgium: Flanders 13, federal plan 15; Malta: 13 floated; Spain: bill lapsed on parliament dissolution, 6 October 2026; Czechia: 15 floated by Prime Minister Andrej Babiš.

Source: EPICENTER tracker (see Appendix A)

The first movers chose different limits, and none has a limit in force yet. France banned social networks for under-15s with no parental override; on 14 August 2026, its Constitutional Council declared Article 1 of the law, which contained the ban, unconstitutional (Conseil constitutionnel 2026). The replacement draft notified in September adds what the first lacked: parental exemption for 13- and 14-year-olds and a list of ten risky features

instead of a blanket ban.[4] Portugal's bill, approved in principle on 12 February 2026 and still in committee, bars access for under-13s and requires verified parental consent for 13- to 15-year-olds, using the national Chave Móvel Digital.[5] Denmark's draft sets 15 as the age limit for access and has dropped the parental consent option its government had originally agreed to.[6] On 14 October 2026, Germany's cabinet adopted key points – a policy outline rather than a bill – for a transitional national rule barring under-13s from social networks in principle, with graduated restrictions for 13- to 17-year-olds, until an EU minimum age applies.[7] On 22 October 2026, Greece's parliament adopted an under-15 ban, due to apply from 1 January 2027.[8] Each choice is defensible. However, when taken together, they make a single market impossible.

The desire for an EU solution is near-universal. The Jutland Declaration of 10 October 2025, calling for privacy-preserving age verification on social media, was signed by 25 member states; ministers floated ages between 14 and 16 (Council of the EU 2025). Only Estonia and Belgium did not sign: Estonia because bans cannot be enforced and Belgium because Flanders' media minister found the checks disproportionate.[9] In June 2025, France, Spain, and Greece, together with Cyprus, Denmark, and Slovenia, proposed a 'European digital age of majority' that each country would set itself; six more member states backed it in the Council debate.[10] After the

4 'Réseaux sociaux des mineurs : le nouveau projet français à l'épreuve du KIDS Act' [Social networks of minors: the new French project put to the test by the KIDS Act], Le Club des Juristes, 18 September 2026 (https://www.leclubdesjuristes.com/societe/numerique/reseaux-sociaux-des-mineurs-le-nouveau-projet-francais-a-lepreuve-du-kids-act-17377/).

5 'PSD e PS aprovam proibição das redes sociais a menores de 13 anos' [PSD and PS approve social media ban for children under 13], *Diário de Notícias*, 12 February 2026 (https://www.dn.pt/pol%C3%ADtica/psd-e-ps-aprovam-probio-das-redes-sociais-a-menores-de-13-anos).

6 'New age limit of 15 for certain social media platforms', Mondaq, 15 October 2026 (https://www.mondaq.com/data-protection/1855422/new-age-limit-of-15-for-certain-social-media-platforms).

7 'Kinder- und Jugendschutz in der digitalen Welt verbessern' [Improving child and youth protection in the digital world], Bundesregierung, 14 October 2026 (https://www.bundesregierung.de/breg-de/aktuelles/kabinett-eckpunkte-jugendmedienschutz-2456960).

8 'Greek parliament approves social media ban for under-15s from January', *Xinhua*, 23 October 2026 (https://english.news.cn/20261023/9aaea55541e84f01b2abb8197a5c6f35/c.html).

9 'EU countries sign Danish plan to boost child protection online', *Euronews*, 13 October 2025 (https://www.euronews.com/next/2025/10/13/eu-countries-sign-danish-plan-to-boost-child-protection-online).

10 'Nine EU countries support the proposal by Spain, France and Greece to protect children online', La Moncloa, 6 June 2025 (https://www.lamoncloa.gob.es/lang/en/gobierno/news/paginas/2025/20250606-protection-children-online.aspx).

French law fell, President Emmanuel Macron asked the Commission to set an EU-wide ban for under-15s.[11] Outside the EU, Australia has enforced an under-16 age limit since 10 December 2025, Turkey's under-15 rules took effect on 1 November 2026,[12] and the UK announced in June 2026 an under-16 ban from spring 2027 on algorithm-driven social media.[13]

The EU Kids Act

The EU Kids Act is a proposed regulation under Article 114 of the Treaty on the Functioning of the European Union. The Commission's own analysis calls it a 'fully harmonised access restriction' that, if adopted, leaves member states no room for additional national age limits, except for content such as pornography and gambling (European Commission 2026b: 42). As a proposal, it creates no binding obligations until the EP and the Council adopt it, and its provisions may change. The main provisions are as follows (European Commission 2026g):

- **Scope:** Social networks, video-sharing platforms, online games, app stores, operating systems, AI companions, and general conversational chatbots, with no general size threshold: 'Small and micro enterprises are not exempted', says the explanatory memorandum. Compliance plans and audits apply only to very large online platforms (Article 5), and micro and small enterprises are spared post-market monitoring of AI chatbots (Article 14), but the access, design, and age-assurance rules apply regardless of size.
- **Age gate:** A social network or video-sharing platform with any one of five features (live-streaming, contact with strangers, a profiling recommender system, recommendations from outside a user's connections, or

11 'Macron urges EU ban on social media for under-15s in letter to von der Leyen', *The Star* (Reuters), 8 September 2026 (https://www.thestar.com.my/tech/tech-news/2026/09/08/macron-urges-eu-ban-on-social-media-for-under-15s-in-letter-to-von-der-leyen).

12 'Sosyal medyaya 15 yaş sınırı: Yeni düzenleme Resmi Gazete'de' [15-year age limit for social media: New regulation in the Official Gazette], NTV, 10 October 2026 (https://ntv.com.tr/turkiye/sosyal-medyaya-15-yas-siniri-yeni-duzenleme-resmi-gazetede-1745607); '15 yaş altına sosyal medya yasağı başladı: Platformları hangi kurallar bekliyor?' [Under-15 social media ban begins: What rules await platforms?], *Euronews Türkçe*, 1 November 2026 (https://tr.euronews.com/2026/11/01/15-yas-altina-sosyal-medya-yasagi-basladi-platformlari-hangi-kurallar-bekliyor).

13 'Social media to be banned for under-16s in landmark government move to give kids their childhood back', GOV.UK, 15 June 2026 (https://www.gov.uk/government/news/social-media-to-be-banned-for-under-16s-in-landmark-government-move-to-givekids-their-childhood-back).

features enabling ‘uninterrupted content consumption’ and prompting notifications) may not give accounts to under-15s (Article 6(1)).

- **Supervised and child accounts:** Platforms may, but need not, allow guardians to open limited accounts for 13- and 14-year-olds; in those accounts, guardians must be able to set a daily time limit, which ‘shall not exceed one hour per day’ (Article 6(2)(b)). Under-13s may only use video-sharing services designed for children, through a guardian’s own account, again with a daily limit of no more than one hour (Article 7(4)(c)).
- **Existing accounts:** Accounts held by under-15s, or those ‘in relation to whom the age cannot be established’, must be disabled within six months of application (Article 6(4)). Providers need not verify age where they can establish ‘with a high degree of confidence’ that a user has reached the minimum age (Article 32(2)).
- **Safety by design:** All minors are covered by rules concerning addictive design, time limits, recommender systems, safe default settings, contacts, and in-game spending (Chapter III).
- **Verification:** The age gate must rely ‘exclusively’ on the EU age verification solution supplied by a third party (Article 29(2)), and ‘any age assurance measure shall be zero knowledge proof’ (Article 28(3)). Member states must provide a free EU age verification solution and an electronic attestation of parental responsibility (Article 31).
- **Timing and enforcement:** The regulation would apply six months after its entry into force (Article 43), with fines of up to 6% of worldwide turnover through the Digital Services Act (DSA) and the AI Act.

The file took time to find a home in the EP. After three committees (internal market, civil liberties, and culture and education) had claimed responsibility for it, it was referred in late October to the Internal Market and Consumer Protection Committee as the lead committee, with the public health, industry, culture and education, legal affairs, and civil liberties committees asked for opinions (European Parliament 2026). The dispute reflects a real feature of the text: It combines product rules for safe design, access bans that raise questions of rights, and screen-time limits that touch on parental and educational choices.

Analytical framework: proportionality, parental choice, and the test of evidence

The analysis that follows rests on five principles and on evidence of how comparable interventions have performed in practice.

First, parents are the primary decision-makers for their children. Families differ in their circumstances, values, and children's maturity; the UN Committee on the Rights of the Child asks states to respect children's evolving capacities and parents' guidance in the digital environment (UN Committee on the Rights of the Child 2021). Rules should support parental judgement, not replace it.

Second, regulation should target specific, evidenced harms rather than broad categories of services or features. The same rule should apply to the same risk, regardless of the business model or legal category the service falls under.

Third, government failure is as real as market failure. Rules written in the name of a worthy cause can be shaped by interests that profit from them (Yandle 1983), and rules that cannot be enforced may push behaviour into places that are harder to see and supervise.

Fourth, regulatory burdens fall hardest on the smallest actors. Large firms can absorb fixed compliance costs, but small firms, start-ups, and volunteer-run communities often cannot. A rule that appears neutral may therefore entrench incumbents.

Fifth, privacy is a part of safety. Data collected to prove age becomes a target for hackers and for misuse; every requirement that affects all users, adults included, must be justified by the risk it addresses.

Using these five principles, we apply a simple empirical test: Have comparable interventions, notably France's ban, Australia's under-16 limit, and age verification for adult content in France, the UK, and the US, made children safer without significant side effects? Where the evidence shows evasion, displacement to other services, or legal failure, the burden of proof for repeating the same approach at EU scale rises accordingly.

Key findings

The sections that follow start from a point of agreement, that some online services pose real risks to children, before showing why the instruments chosen at the national and EU levels are likely to fall short of their aims and raise costs for families, users, and smaller firms.

Fragmentation turns compliance into a fixed cost

Age verification is relatively cheap per check but carries fixed set-up costs. Ofcom's July 2026 report on the first six months of the UK regime, which presents early findings rather than final conclusions, found that direct costs did not appear prohibitively high for the services it analysed: a median of around £0.06 per check, with set-up costs clustering in the tens of thousands of pounds. It also noted that the evidence was incomplete and that costs 'could pose a barrier to smaller services' (Ofcom 2026). Australia's own estimate assumed 80 staff hours per platform just to set up age checks (Australian Government 2024). A service operating across the EU would have to integrate Portugal's Chave Móvel Digital, Greece's Kids Wallet, Cyprus's Digital Citizen app, Poland's mObywatel, Slovakia's eID, and Denmark's AltID, each with different age limits, consent rules, and regulators. A large platform spreads those costs over hundreds of millions of users. A small one pays them per country, or does not enter that market.

The national route is also legally fragile. Every draft must be notified to the Commission through the Technical Regulations Information System (TRIS). The Commission issued detailed opinions on the French and Greek drafts in July and August 2026, respectively, extending their standstill periods (European Commission 2026e, 2026f). The Commission's position is that member states may set an age but may not add their own obligations on platforms in areas that the DSA already harmonises. National laws can

therefore set the age limit but not the rules that make it work, and, under the same procedure, a national draft on a matter covered by the Commission's proposal must be postponed until 12 months from its notification (European Commission 2026b). The Commission did exactly that with Austria's draft on 28 October 2026, extending its standstill by a year.[14]

Critics question the bans themselves

Age limits have broad support, but a growing number of critics contend that bans are the wrong tool. Four objections keep recurring.

Children's rights. Critics argue that bans restrict children's rights to information, expression, and participation, which the UN Committee on the Rights of the Child recognises in the digital environment (UN Committee on the Rights of the Child 2021). In September 2026, a group of more than 130 organisations and experts wrote that restricting children's online participation would violate 'their rights to freedom of expression and access to information'.[15] France's Constitutional Council accepted a version of this argument when it found the French ban a disproportionate restriction of freedom of communication.

The evidence. The claim that social media causes adolescent mental illness remains disputed. Large studies found the average association between digital technology use and adolescent well-being to be small (Orben and Przybylski 2019), and reviewers of the causal case argue that it goes beyond the data (Odgers 2024). The Commission's own expert panel stopped at 13 as the age of access and recommended safe design instead of excluding 13- to 17-year-olds (European Commission 2026a).

Effectiveness and the burden on families. Italy's prime minister said in June 2026 that a ban 'can be easily circumvented' and would shift the

14 'Österreichs Social-Media-Verbot: EU-Kommission verlängert Frist um ein Jahr' [Austria's social media ban: EU Commission extends deadline by one year], *Börse Express*, 30 October 2026 (https://www.boerse-express.com/news/articles/oesterreichs-social-media-verbot-eu-kommission-verlaengert-frist-um-ein-jahr-957433).

15 '130 associations s'opposent à l'interdiction des réseaux sociaux pour les enfants, nouveau revers pour Emmanuel Macron ?' [130 associations oppose the ban on social media for children, a new setback for Emmanuel Macron?], *Phonandroid*, 9 September 2026 (https://www.phonandroid.com/?p=2708217).

problem onto families.[16] UNICEF Portugal's director warned that 'the outright ban on access does not solve' the problem and that the only remedy known to work is accountability for safe design.[17]

The voices of young people and civil society. The Organising Bureau of European School Students' Unions stated that students feel the responsibility for a safer digital environment is being placed on their shoulders and that platforms do not become safer when users turn 18.[18] In Greece, 25 organisations, including digital rights, mental health, and child protection groups, asked the government for an open consultation and for rules to make platforms safer for all users, not only for under-15s.[19] Luxembourg's national youth council opposed a ban for under-15s or under-16s.[20] In Belgium, the leader of a governing party called the federal plan 'useless, ineffective and counterproductive',[21] and Estonia's government argued that 'the platforms should change'.[22]

16 'Meloni says banning kids from social media is not a solution on its own', The Next Web, 17 June 2026 (https://thenextweb.com/news/meloni-social-media-ban-children-no-panacea).

17 'Proibir redes sociais a menores não resolve abusos, alerta UNICEF Portugal' [Banning social media for minors does not solve abuses, warns UNICEF Portugal], *HealthNews*, 6 September 2026 (https://healthnews.pt/2026/09/06/proibir-redes-sociais-a-menores-nao-resolve-abusos-alerta-unicef-portugal/).

18 'Meet Europe's youth activists pushing back against blanket social media bans', *Euronews*, 11 May 2026 (https://www.euronews.com/next/2026/05/11/meet-europes-youth-activists-pushing-back-against-blanket-social-media-bans).

19 '25 Greek and international organizations raise concerns to the prime minister and the competent ministers regarding the Draft Law on the Prohibition of Access to Social Media for Children under 15 years old', Homo Digitalis, 25 May 2026 (https://homodigitalis.gr/en/posts/136244/).

20 'Dossier consolidé' [Consolidated record], Bill no. 8690, Chamber of Deputies of Luxembourg, 16 September 2026 (https://wdocs-pub.chd.lu/docs/compilation/docpa/pdf/8690_Dossier_Complet.pdf). Complete file including the opinion of the National Youth Council.

21 'Interdire les réseaux sociaux aux moins de 15 ans: «Inutile, inefficace et contreproductif», dénonce Georges-Louis Bouchez' [Banning social media for under-15s: 'Useless, ineffective, and counterproductive', denounces Georges-Louis Bouchez], *La DH Les Sports+*, 23 July 2026 (https://www.dhnet.be/actu/belgique/2026/07/23/interdire-les-reseaux-sociaux-au-moins-de-15-ans-inutile-inefficace-et-contreproductif-denonce-georges-louis-bouchez-7S7JXABFHJBNFNAKPSV5MJVEHI/).

22 'Don't ban children from social media, Estonia tells EU', *The Star* (Agence France-Presse), 8 September 2026 (https://www.thestar.com.my/tech/tech-news/2026/09/08/don039t-ban-children-from-social-media-estonia-tells-eu).

Who gains from good intentions: Baptists and bootleggers online

Historical analogies might be useful for a better understanding of the regulatory issue. The American economist Bruce Yandle noticed something odd about laws that closed liquor stores on Sundays (Yandle 1983). They were backed by two groups who never sat at the same table. Church groups, the 'Baptists', campaigned for them on moral grounds. Illegal liquor sellers, the 'bootleggers', quietly welcomed them, because every closed shop sent customers their way. Rules with this double backing tend to last and to be written in ways that suit the quiet beneficiaries.

In the debate on minors online, the campaigners are sincere, and their concern is real – parents' movements, paediatricians, child protection organisations, and governments that want to show they are acting. The question is who else gains from the way age limits are written. Every age verification design chooses a gatekeeper, and the gatekeeper gains. If each service must check ages itself, the winners are large platforms that already hold verified payment data, run their own age estimation models, and employ compliance teams. If the check sits in the operating system or app store, the winners are Apple and Google. If it is run by a national identity app, the state and its contractors become the gatekeeper. Behind all three stands an age verification industry whose market exists because the law requires it.

The large firms understand this well. In the US, Meta lobbied for the 2025 Utah and Louisiana laws that make app stores verify users' ages, comparing the app store to a liquor shop that should check identity; Apple replied that the app store is a shopping mall and Meta is the liquor shop.[23] Each company wants to pass on the checking, with its cost and legal risk, to a rival. Three effects then push in the same direction. Verification systems, audits, and compliance plans cost roughly the same regardless of a firm's size; every extra step at sign-up discourages people from trying a new service; and laws define 'social network' and 'video-sharing platform' around today's market leaders. The result is a familiar paradox: Rules adopted because a few platforms are too powerful raise the barriers that keep them powerful. Sweden's government inquiry proposes to exempt micro- and small firms and civil society platforms (Regeringen 2026); the Kids Act deliberately does not (European Commission 2026g).

23 'Meta clashes with Apple, Google as US states push age verification laws', *Business Standard* (Bloomberg), 26 July 2025 (https://www.business-standard.com/technology/tech-news/meta-clashes-with-apple-google-as-us-states-push-age-verification-laws-125072600116_1.html).

Even the best design needs an identity document

The best-designed age check in force in Europe is the one France's media regulator, Arcom, imposed on pornographic sites under the 2024 law on securing and regulating the digital space (Arcom 2024). An independent third party checks the user's age and issues a proof; the site never sees who the user is, and the verifier never learns which site asked. Each site must offer at least two methods, usable by at least 80% of French adults. Enforcement has been real: In July 2026, Arcom opened proceedings against 31 more sites and asked French internet providers to block 13 of them,[24] and the Court of Justice of the EU confirmed on 16 June 2026 that France may impose such checks on sites established in other member states, under conditions.[25]

While the token is anonymous, the proof behind it is not. Someone, somewhere, must look at a passport, a bank card, or a face, and that party becomes a store of exactly the data criminals want. In October 2025, Discord disclosed that government identity photos of about 70,000 users, collected by a vendor handling age-related appeals, may have been exposed.[26] Extending such checks from adult content to the social networks used by almost everyone multiplies the number of people who must hand over that data. This was one reason France's Constitutional Council struck down the social media ban; it would have required every user, adults included, to prove their age, with no limits set by the law on how (Conseil constitutionnel 2026).

Denmark shows where the alternative leads. Its draft bill of 7 September 2026 sets an age limit of 15 for designated social networks and video-sharing platforms from 1 July 2027 (Folketinget 2026). The bill prescribes no method, but the ministry names AltID, the new state digital identity app, as the likely tool. If it becomes the gate, logging into a social network will depend on a state credential. Greece follows the same path with its Kids

24 'Vérification d'âge: l'Arcom tente de bloquer 31 nouveaux sites pornographiques (mais le problème reste entier)' [Age verification: the Arcom tries to block 31 new pornographic sites (but the problem remains)], *MacGeneration*, 31 July 2026 (https://www.macg.co/ailleurs/2026/07/verification-dage-larcom-tente-de-bloquer-31-nouveaux-sites-pornographiques-mais-le-probleme-reste-entier-310139).

25 'Judgment in joined cases C-188/24 and C-190/24', Court of Justice of the European Union, press release, 16 June 2026 (https://curia.europa.eu/site/upload/docs/application/pdf/2026-06/cp260087fr.pdf).

26 'Discord updates breach disclosure, government IDs of tens of thousands compromised', *Cyber Daily*, 10 October 2025 (https://www.cyberdaily.au/security/12755-discord-updates-breach-disclosure-government-ids-of-tens-of-thousands-compromised).

Wallet, and Cyprus, Italy, Poland, Portugal, and Slovakia plan to use national identity apps or wallets. The Kids Act generalises the model, requiring every member state to provide an electronic attestation of who is the parent of whom (European Commission 2026g).

Most proposals are less careful. Of the 23 national initiatives, 11 do not specify how age will be checked: These include the Swedish, Dutch, Lithuanian, and Luxembourg proposals. Ten point to a state identity app or wallet, while Romania's allows age estimation. Only Austria's draft prescribes an independent, double-blind check by a third party without tying it to a state identity app (European Commission 2026d).[27] France's replacement draft names neither an enforcement authority nor anyone responsible for verifying age.[28] A rule that is vague on method will default to whatever the largest platforms already do: document uploads, face scans, or inference from behaviour, the very methods the expert panel advised against.

September as the test: the risk of displacement

September 2026 was meant to show what happens when a European country removes under-15s from social media. The French law would have barred new accounts from 1 September and closed existing ones in early 2027. However, no account was deleted. The Constitutional Council held that the ban was not an adapted, necessary, and proportionate restriction of freedom of communication (Article 11 of the 1789 Declaration), because it applied to any service letting users connect and share without any condition relating to features or content, and because parents could neither lift nor limit it and it involved no assessment of the risk to the individual minor. Separately, it held that requiring every user, adults included, to prove their age without legal safeguards failed to protect the right to privacy (Article 2) (Conseil constitutionnel 2026). Those objections apply equally to several other national drafts and partly to the Kids Act, whose Article 6(4) would disable the accounts of every under-15 in the EU and of anyone whose age 'cannot be established' (European Commission 2026g).

The best evidence therefore comes from Australia, whose minimum age rule took effect on 10 December 2025 for ten platforms, including YouTube,

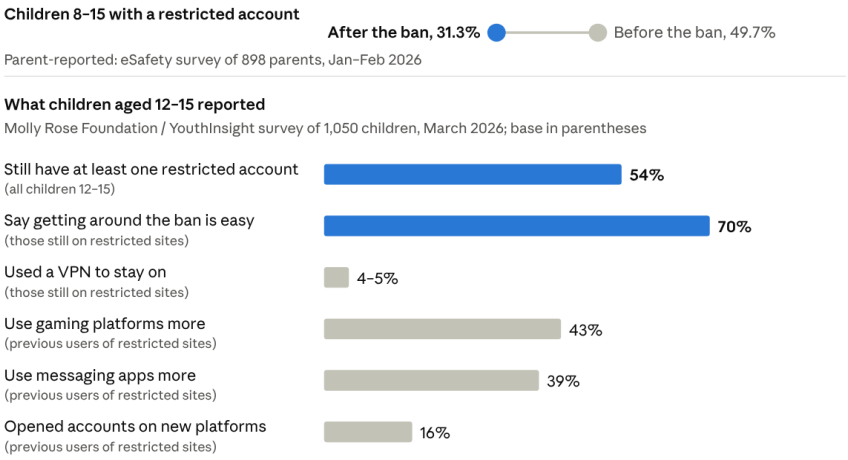
27 'Audiovisuelle Mediendienste-Gesetz, KommAustria-Gesetz, Änderung' [Audiovisual Media Services Act, KommAustria Act, Amendment], ministerial draft 132/ME, Austrian Parliament, 2026 (https://www.parlament.gv.at/gegenstand/XXVIII/ME/132).

28 'Réseaux sociaux des mineurs', Le Club des Juristes, 2026.

TikTok, Instagram, and Snapchat, while Discord, Roblox, WhatsApp, Steam, and YouTube Kids were excluded. About 4.7 million accounts were removed or restricted in the first weeks, though the regulator stresses that it counts accounts, not children; the figure measures platform activity, not whether children are safer.[29] Two early surveys give a fuller picture (Figure 3). In the regulator's survey of 898 parents, conducted from 19 January to 2 February 2026, the share of children aged 8 to 15 with at least one account on the restricted platforms fell from 49.7% to 31.3%, but most children who had held accounts on Facebook, Instagram, Snapchat, or TikTok still had them (eSafety Commissioner 2026). In a survey of 1,050 12- to 15-year-olds on an online youth panel, conducted from 12 to 31 March 2026 for the Molly Rose Foundation, a UK charity, 54% still had at least one account on a restricted platform, only around one in twenty used a virtual private network (VPN), and many of those who had used restricted platforms before reported using gaming and messaging services more (Molly Rose Foundation 2026). Both surveys are early and self-reported, and neither measures harm directly. They indicate that evasion and displacement are real risks, not that the ban has failed.

29 'Nearly 5M kids' accounts removed from social media, Lemon8 avoids legislation after "self assessment"', *B&T*, 16 January 2026 (https://www.bandt.com.au/nearly-5m-kids-accounts-removed-from-off-social-media-lemon8-say-it-does-not-fall-under-legislation/).

Figure 3. Australia's under-16 ban: early survey evidence, January to March 2026



Sources: eSafety Commissioner (2026) and Molly Rose Foundation (2026)

In launch week, Lemon8 and Yope topped the lifestyle category of Apple's App Store.[30] Ten months in, no platform has been fined: 'We do not have a fine-issuing button', the regulator told the Australian Senate.[31]

The same pattern appears wherever age checks have been enforced. After US states required age verification for pornography, searches for the main compliant site fell by 51%, while searches for the main non-compliant site rose by 48% and searches for VPNs by 24% (Lang et al. 2025). In the UK, daily VPN users more than doubled, from about 650,000 to over 1.4 million, when checks began in July 2025, before easing to about 900,000 by November.[32] When Pornhub's owner withdrew from France in June 2025, Proton VPN reported a 1,000% jump in sign-ups within half an hour.[33] These studies concern adult content and VPN use rather than children's social media, but they point the same way: When

30 'Australians seek alternatives as social media ban takes hold', *Mobile World Live*, 10 December 2025 (https://www.mobileworldlive.com/regulation/australians-seek-alternatives-as-social-media-ban-takes-hold/).

31 'Senate Estimates opening statement', eSafety Commissioner, 27 May 2026 (https://esafety.gov.au/newsroom/blogs/senate-estimates-opening-statement).

32 'UK porn traffic down since beginning of age checks but VPN use up, says Ofcom', *The Guardian*, 10 December 2025 (https://www.theguardian.com/society/2025/dec/10/uk-porn-traffic-down-age-checks-vpn-use-up-ofcom).

33 'VPN demand jumps 1,000% after Pornhub pulls out of France', *Straight Arrow News*, 7 June 2025 (https://san.com/cc/vpn-demand-jumps-1000-after-pornhub-pulls-out-of-france/).

compliant services add friction, part of the traffic moves to services that do not comply. For children, that could mean leaving platforms with teen accounts, moderation teams, and reporting tools for apps with none or for services beyond the reach of any European regulator.

The Kids Act: one rulebook, new loopholes

The Kids Act fixes the fragmentation problem but rebuilds many of the national laws' design flaws at EU scale. Table 1 sets out the main issues in the text, starting with those that most affect children and families.

Table 1. Design issues in the EU Kids Act proposal

Problem	Where in the text	Why it matters
A one-hour cap parents cannot raise	Articles 6(2)(b) and 7(4)(c): Guardians may set a daily limit 'which shall not exceed one hour per day'	The state overrides parents upwards, never downwards. A child who wants to watch a film on a video-sharing platform hits the cap after an hour and moves to a streaming service the Act does not cover. The cap restricts long-form content the most, generally seen as less problematic than short-form feeds (meaning a child cannot watch a movie on YouTube). It also applies per service, so ten apps still allow ten hours.
Video-sharing in, video-on-demand out	Scope, Article 2(1); no mention of on-demand or music streaming	Streaming services use autoplay and personalised recommendation rows for children too but will face none of the Kids Act's rules on breaks in viewing, on protecting school time and night-time sleep, or on recommender systems until a separate review of the Audiovisual Media Services Directive. Identical viewing habits are regulated by the service's legal category, not by risk, which distorts competition between services.

Problem	Where in the text	Why it matters
Recommender rules for some services only and the wrong tool for young children	Article 10(2): explicit preferences first, engagement signals off by default, no data from outside the service; Article 7(1)(h): Recommendations and search for under-13 services are 'turned off and cannot be activated' without a prior assessment	Curation is how children's video services keep content age-appropriate. Switching it off by default leaves younger children with unsorted catalogues. Safety classifiers rely on the behavioural signals the text switches off, and cross-service parental controls such as Google Family Link sit 'outside the service'.
Kids' and teen accounts lose their legal status	Articles 6(2) and 7: only guardian-created accounts for 13- and 14-year-olds; no social network access at all under 13; no account of the child's own under 13	Teen accounts with restricted defaults, which large platforms rolled out in 2024–25, can no longer be offered directly to teenagers. Children lose age-appropriate products and are incentivised to lie about their age.
The same features regulated twice	Article 6(1) triggers vs Chapter III (Article 9 on addictive design, Article 10 on recommenders)	The features that trigger the account ban are those Chapter III already makes safe for every under-18. Because almost every social or video service has at least one of these features, the trigger list becomes a blanket ban. Veale (2026) reads the criteria as implying 'a 1hr limit on Spotify, Strava, Chess.com' for 13- and 14-year-olds.
Existing tools sidelined	Article 16: App stores block apps rated above a user's age; Pan-European Game Information (PEGI) named only in Recital 39	PEGI ratings, console controls, Family Link, and Screen Time already let parents decide. Turning advisory age ratings into automatic statutory blocks replaces parental judgement rather than supporting it.
Educational AI treated as a risk	Articles 2(4) and 3(5)(d): Only educational bots run by or for schools are exempt; Article 14(1)(b): no use of prior interactions by default	A general-purpose assistant used for homework is also subject to time limits and to 'default amnesia': By default, it may not use what it learned from a child's earlier conversations in later ones. A tutor that cannot remember yesterday's lesson is less useful, and the memory carve-out for safety is left undefined.

Problem	Where in the text	Why it matters
Operating-system checks on shared devices	Article 29(6): An operating system holding an age signal must pass it on	A family tablet or computer logged into a parent's profile passes an adult signal to the child or forces a child profile on the adult. Shared devices are most common in poorer households. Sideloaded apps and the open web bypass the store entirely, and operating systems have no designated regulator.
Adults pushed towards identity checks	Article 8(1): minor-safe defaults for all users, signed-out ones included, until adulthood is established; Article 6(4): accounts disabled where age 'cannot be established'	Normal features become an adults-only reward for verifying. Adults without an identity document, a suitable phone, or a digital wallet risk losing existing accounts.
Age estimation ruled out in practice	Article 28(3) requires zero-knowledge proof for 'any' age assurance; Article 29(2) requires 'exclusively' the EU solution for the gate	Facial age estimation and other low-friction methods cannot meet the requirements of a zero-knowledge test. This empties Article 29(4), which allows providers to use methods other than the EU solution for default settings and app stores if they meet the requirements of Articles 27 and 28, and goes against the Commission's own cost reasoning. A tiered approach (light checks for low risk, hard checks for high risk) collapses into identity-based verification.
Games and hobby servers caught without a small-firm filter	Article 3(5)(e)–(g): any video game or gaming platform, online- or offline-capable; no general exemption for small firms	About 80% of EU games companies are small or micro firms (European Commission 2026b). Developers and private-server communities fear verification costs will push them out of the EU market, benefiting large studios.

Problem	Where in the text	Why it matters
Thin evidence, short deadlines, and open-ended powers	No standard impact assessment (a staff working document analyses impacts instead); costs for small providers 'not possible to conclusively determine'; 30-day compliance plans for existing very large online platforms (Article 5); six months to application (Article 43); triggers and exemptions amendable by a delegated act (Articles 2(5) and 6(6))	The General Data Protection Regulation (GDPR), the DSA, and the AI Act each gave about two years to comply. The text also carries drafting errors: Article 6(1) begins at point (d), several cross-references point to the wrong articles, and the financial statement still uses an earlier title ('CARE').

Sources: European Commission (2026a, 2026b); Veale (2026); authors' analysis

The public consultation shows how these provisions are being received. By 17 October, the Commission's consultation, open until 3 December 2026, had received 2,496 responses, 98% of them from individual citizens (European Commission n.d.). About six in ten raised privacy and surveillance concerns, half mentioned games, and about 30% the position of small and independent developers. The responses are not a representative sample. Many were mobilised by gaming communities, including fan forums where players fear small private servers will not survive verification costs.[34] Organised stakeholders were yet to file under their own names, but digital rights groups have published their objections elsewhere;[35,36] Video Games Europe has cautioned 'against sweeping age assurance measures applicable to every game and player in Europe'.[37]

34 'The new "EU KIDS Act" threatens the continued existence of small private servers in all games, including Mordhau', r/Mordhau (Reddit), video, 1 October 2026 (https://www.reddit.com/r/Mordhau/comments/1wuvte3/the_new_eu_kids_act_threatens_the_continued/).

35 'The KIDS Act will make the internet less safe', European Digital Rights, 30 September 2026 (https://edri.org/our-work/the-kids-act-will-make-the-internet-less-safe/)

36 Christoph Schmon, 'EU Kids Act won't keep the internet accountable and trustworthy', Electronic Frontier Foundation, 21 September 2026 (https://www.eff.org/deeplinks/2026/09/eu-kids-act-wont-keep-internet-accountable-and-trustworthy).

37 Neil Long, 'Video Games Europe warns against sweeping restrictions proposed in the EU KIDS Act', MobileGamer.biz, 17 September 2026 (https://mobilegamer.biz/video-games-europe-warns-against-sweeping-restrictions-proposed-in-the-eu-kids-act/).

Assessment of the Commission's proposal

The Commission's underlying objective, a single EU rule that keeps children safer online, is legitimate, and harmonisation alone would remove the costly and legally fragile patchwork described above. Assessed against the evidence, however, the proposal presents substantial risks that warrant careful consideration.

The central concern is that the proposal relies on access by age as its main lever, while the evidence reviewed here points to design as a central source of harm and to evasion as a common response to bans. As the Australian experience suggests, excluding children from mainstream services may not reliably keep them away from risky ones. Several specific risks are detailed below:

- **Parents overruled:** A statutory one-hour ceiling that parents cannot raise, and the removal of accounts that children could use under supervision, substitute a single legal formula for the judgement of families.
- **Risk of displacement:** Children who lose accounts on regulated platforms may move to streaming services, messaging apps, games, or services beyond the reach of EU regulators, where protections are weaker.
- **Identity checks for everyone:** Minor-safe defaults for all users until adulthood is established, and the disabling of accounts whose holders' age 'cannot be established', push adults towards identity-based verification and concentrate sensitive data in the hands of a few verifiers.

- **Higher costs for smaller firms:** With no general exemption for small firms, a short transition, and fixed verification costs, the proposal favours the largest platforms and studios, which can absorb compliance costs and would gain from the exit of smaller rivals.
- **Uneven treatment of comparable services:** Video-sharing platforms face rules that video-on-demand services do not, and recommender restrictions apply to some services but not others offering similar content.
- **Legal uncertainty:** Triggers and exemptions can be changed by a delegated act, the text contains drafting errors, and the timeline is far shorter than that of comparable EU digital legislation.

In fairness, the Commission reaches a different conclusion on several of these points. It argues that a single, fully harmonised rule will replace up to 27 national regimes and the compliance costs they impose, and that the safety-by-design obligations in Chapter III target design rather than access alone, which is the approach many critics of the bans favour (European Commission 2026b). Those benefits are real. However, they do not offset the costs of the access ban's broad triggers, of identity-based verification, and of the absence of any proportionality for small firms. Harmonisation is welcome, but harmonising the wrong instruments does not make them the right ones.

It is also important to acknowledge the strongest argument on the other side. Supporters point to rising concern about adolescent mental health, which Haidt (2024) attributes largely to the shift to smartphone-based childhoods and to parents who feel unable to resist social pressure on their own: When every classmate is online, no single family can opt out. For them, a legal age limit solves a coordination problem that individual families cannot solve alone. For services whose core features carry evidenced risks for children, such as contact with strangers or live-streaming by minors, an age threshold backed by proportionate verification may be justified.

The objection is not to that narrow case but to the instruments chosen to address it. Extending broad access bans, statutory screen-time caps, and identity-based verification across most of the digital economy raises costs for families, users, and smaller firms while doing little to address the specific harms that motivated the proposal.

Policy recommendations

The following recommendations would address the risks children face online while avoiding the problems in the current national and EU approaches.

1. Keep one harmonised age, and align it with data protection law. A single EU age, fully harmonised, is the main achievement of the Kids Act and should survive the negotiations. The consent age under Article 8 of the GDPR should be aligned with it so that a 15-year-old is not considered an adult under one EU law and a child under another. National laws adopted in the meantime should lapse when the EU rule applies, which France's replacement draft already provides for.

2. Base the threshold on evidence. The Commission's own expert panel recommended an EU floor of 13, combined with safe design for teenagers. Any higher threshold should be justified by evidence of specific harms and reviewed once safety-by-design obligations are in force.

3. Verify once, privately, and offer more than one route. A privacy-preserving proof of age, issued once and reused, is less intrusive than a check at every sign-up. The EU age verification app can serve this purpose, provided it is one option among several rather than the exclusive gate. Low-risk uses should allow age estimation, and strict verification should be reserved for genuinely high-risk services.

4. Do not make adults prove their age by default. Users who browse without logging in should receive a normal experience, and accounts should not be disabled merely because a holder's age 'cannot be established'.

5. Regulate risky functions, not common features. Obligations should target contact with strangers, live-streaming by minors, and recommendation spirals into harmful content, not features that nearly every service shares. The same function should face the same rule whether it sits on a video-sharing platform or a streaming service.

6. **Leave time limits to parents, and build on existing tools.** Parents, not a statutory ceiling, should set screen time. The law should support tools families already use, such as Family Link, Screen Time, console controls, and PEGI ratings, and treat age ratings as guidance for parents rather than automatic statutory blocks.

7. **Protect age-appropriate products.** Children's and teen accounts with restricted defaults and age-appropriate recommendations should be encouraged, not legislated away. Educational AI tools should be able to remember what a pupil has learned, within clear safety rules. Operating-system age signals should follow user profiles, not devices.

8. **Give small firms a proportionate regime and a realistic transition.** Micro and small enterprises need a simplified regime or an exemption, as Sweden's inquiry proposed. Every provider needs a transition closer to the two years allowed by the GDPR, DSA, and AI Act – instead of the proposed six months. The Commission should publish a full impact assessment, with a cost estimate for small providers, before the EP and the Council fix their positions.

Every amendment can be measured against three questions. Does it reduce a specific, evidenced harm to children rather than restrict a feature in general? Does it leave the decisions that belong to families with parents? Can a 30-person European firm comply at a cost proportionate to its size? A rule that fails the third question is likely, sooner or later, to fail the first two as well.

Conclusion: protection by design, not by exclusion

The concern behind the Kids Act is genuine. Some online services expose children to contact with strangers, harmful content, and designs that encourage compulsive use, and parents are right to expect the law to help. The question is not whether to act but how.

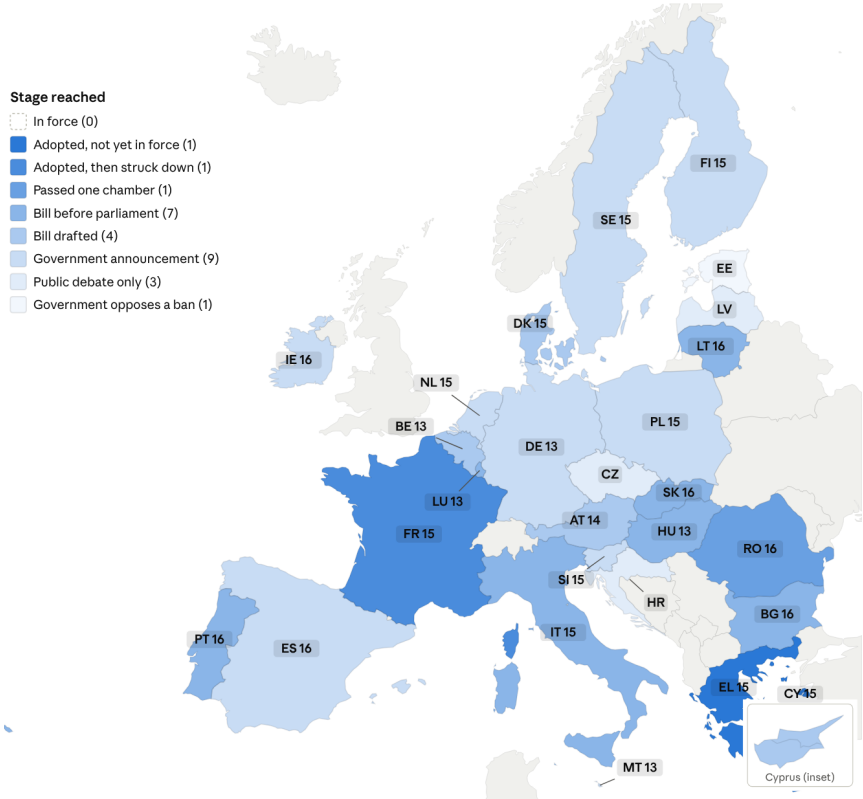
The evidence presented in this paper points to a clear conclusion. National bans have so far failed in court or stalled in parliament; the leading design for privacy-preserving verification still depends on identity documents; and early Australian evidence suggests that bans risk moving children to other services rather than off them. A Union-wide version of the same approach, with a one-hour cap parents cannot raise, recommendations switched off where they help most, identity checks that include adults, and no proportionality for small firms, is unlikely to produce a different outcome.

The alternative is not necessarily inaction. It is to keep the single harmonised age, verify just once and privately, target the functions that carry evidenced risks, leave time limits to parents, treat comparable services alike, and give small firms a realistic path to compliance. As the proposal moves through the EP and the Council, with the EP's lead committee only beginning its work and the consultation running until 3 December, co-legislators face a choice between protection by exclusion and protection by design. The answer will shape how a generation of Europeans grows up online.

Appendix A:
The EPICENTER tracker

The tracker records the status of every member state as of 2 November 2026. Entries for Denmark, France, Germany, Greece, Slovakia, and Sweden come from the EPICENTER network survey; all entries were checked against parliamentary records, TRIS notifications, and official announcements. Figure A1 shows the stage each national initiative has reached, Figure A2 lists the key dates behind and ahead, and Table A1 gives the details for each country.

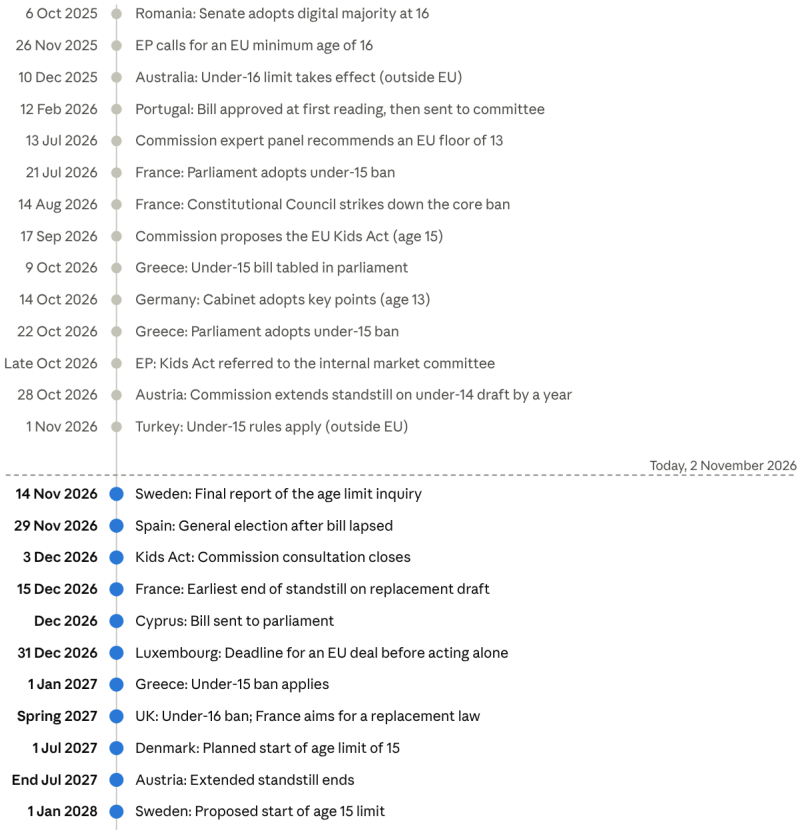
Figure A1. Stage reached by national initiatives on minors' access to social media, October 2026



Notes: The numbers indicate the proposed minimum age. Belgium: Flanders 13, federal plan 15; Malta: 13 floated, no draft; Spain: bill lapsed on parliament dissolution, 6 October 2026.

Sources: EPICENTER tracker, national parliamentary records, and TRIS notifications

Figure A2. Key dates, October 2025 to January 2028



Sources: National parliamentary records, TRIS notifications, and official announcements as of 2 November 2026

Table A1. National initiatives on minors' social media access across the EU-27, most advanced first

Country	Status (as of 2 November 2026)	Proposed age (years)	Parental consent	Age verification	Key dates and next step
France[38]	Adopted, core ban struck down;	15	Revocable parental	Not specified (new draft)	Adopted 21 July 2026; Article 1 struck down 14 August (2026-911 DC); new draft notified 14 September (TRIS 2026/0500/FR), standstill until at least 15 December; target spring 2027
Romania[39]	Passed one chamber	16	Written parental consent for under-16s	Age estimation or validation	Passed by the Senate on 6 October 2025 (121-0-5, L190/2025); in chamber committees (PL-x 356/2025)

38 'Réseaux sociaux des mineurs', Le Club des Juristes, 2026; 'Interdiction des réseaux sociaux aux moins de 15 ans : Bruxelles impose un report de 12 mois, le projet français est-il concerné ?' [Ban on social media for under-15s: Brussels imposes a 12-month postponement; is the French draft affected?], *Kohen Avocats*, 29 October 2026 (https://kohenavocats.com/interdiction-reseaux-sociaux-moins-15-ans-report-12-mois-bruxelles-projet-loi-francais-kids-act-2026/).

39 'Listă Legislație' [List of legislations], Senate of Romania, legislative file L190/2025 (https://www.senat.ro/legis/lista.aspx?nr_cls=L190&an_cls=2025); Chamber of Deputies, PL-x 356/2025, searchable in the Chamber's legislative tracker (https://cdep.ro/pls/proiecte/upl_pck2015.home).

Country	Status (as of 2 November 2026)	Proposed age (years)	Parental consent	Age verification	Key dates and next step
Greece[40]	Adopted, not yet in force	15	None	Kids Wallet/gov.gr Wallet	Notified to the Commission under TRIS (2026/0233/GR) on 8 May 2026; Commission's detailed opinion issued on 10 August; bill tabled 9 October; adopted 22 October; applies from 1 January 2027
Slovakia[41]	Bill before parliament	16	None	State eID or EU wallet, yes/no answer	Approved by cabinet on 26 August 2026; passed first reading in October 2026 as part of an anti-radicalisation bill; applicable from 2027

40 Giorgos Karagiannis, 'How Greece's under-15 social media ban will work on Facebook, Instagram and TikTok', ProtoThema, 12 October 2026 (https://en.protothema.gr/2026/10/12/how-greeces-under-15-social-media-ban-will-work-on-facebook-instagram-and-tiktok/); 'Greek parliament approves social media ban for under-15s from January', *Xinhua*, 23 October 2026 (https://english.news.cn/20261023/9aaea55541e84f01b2abb8197a5c6f35/c.html).

41 'Zákon proti radikalizácii mieri do druhého čítania: Zákaz sociálnych sietí rozdeľuje poslancov' [Law against radicalization goes to second reading: social media ban divides MPs], *Noviny.sk*, 6 October 2026 (https://www.noviny.sk/slovensko/1269113-zakon-proti-radikalizacii-mieri-do-druheho-citania-zakaz-socialnych-sieti-rozdeluje-poslancov).

Country	Status (as of 2 November 2026)	Proposed age (years)	Parental consent	Age verification	Key dates and next step
Lithuania[42]	Bill before parliament (opposition)	16	Parental consent for under-16s	Not specified	Registered on 23 February 2026 (XVP-1239); presentation vote on 9 April 2026 (65-0-9); planned from 1 January 2027
Portugal[43]	Bill before parliament	16 (no access under 13)	Verified parental consent for 13- to 15-year-olds	Chave Móvel Digital	Approved at first reading (in general) on 12 February 2026; in committee since 17 March; no final vote
Italy (European Commission 2025)[44]	Bill before parliament, stalled	15	Contracts with under-15s only through parents	National mini-wallet, then EU app	DDL 1136 filed on 13 May 2024; stalled in Senate committee; government will not table own bill (17 June 2026)
Bulgaria	Bill before parliament (opposition)	16	Parental consent required for 13- to 15-year-olds (May draft)	National digital wallet	GERB-UDF bill tabled on 9 July 2026

42 Seimas of the Republic of Lithuania, draft law XVP-1239 (https://e-seimas.lrs.lt/portal/legalAct/lt/TAP/39ddd7c0108911f1a9c8d1c199560a47).

43 'PSD e PS aprovam proibição das redes sociais a menores de 13 anos', *Diário de Notícias*, 2026.

44 'Social network e minori, la legge italiana s'è arenata' [Social networks and minors, Italian law has run aground], *Avvenire*, 4 May 2026 (https://www.avvenire.it/politica/social-network-e-minori-la-legge-italiana-se-arenata_107931).

Country	Status (as of 2 November 2026)	Proposed age (years)	Parental consent	Age verification	Key dates and next step
Hungary	Bill before parliament (opposition)	13	Not specified	Not specified	KDNP bill tabled on 19 May 2026; governing Tisza has not taken a position
Luxembourg[45]	Bill before parliament	13	Consent for 13- to 15-year-olds	Not specified	Bill 8690 tabled on 21 January 2026; prime minister's pledge on 19 May: national rule if no EU deal by end-2026
Austria (European Commission 2026d)[46]	Bill drafted and notified; EU standstill extended	14	None	Third-party double-blind check; ID Austria optional	Approved by cabinet on 27 July 2026; notified under TRIS (2026/0405/AT) on 28 July; standstill extended by a year on 28 October, citing the Kids Act; earliest start end of July 2027

45 'Dossier consolidé', Bill no. 8690, Chamber of Deputies of Luxembourg, 2026.
46 'Audiovisuelle Mediendienste-Gesetz, KommAustria-Gesetz, Änderung', ministerial draft 132/ME, Austrian Parliament, 2026; 'Österreichs Social-Media-Verbot: EU-Kommission verlängert Frist um ein Jahr', *Börse Express*, 30 October 2026 (https://www.boerse-express.com/news/articles/oesterreichs-social-media-verbot-eu-kommission-verlaengert-frist-um-ein-jahr-957433).

Country	Status (as of 2 November 2026)	Proposed age (years)	Parental consent	Age verification	Key dates and next step
Denmark[47]	Bill drafted	15	None (dropped)	Not prescribed; AltID named	Consultation from 7 September to 5 October 2026; government to seek Commission approval (2 November); introduction in early 2027; planned start of 1 July 2027 may slip
Cyprus[48]	Bill drafted	15	None	Digital Citizen app	Action plan adopted on 16 September 2026; bill sent to parliament in December 2026
Belgium[49]	Flemish decree drafted; federal plan	13	None	Not specified (federal: itsme or MyGov)	Flemish draft approved in principle on 26 June 2026; federal draft not yet adopted

47 'New age limit of 15 for certain social media platforms', Mondaq, 2026; 'Denmark seeks EU approval to introduce social media age limit of 15', *The Copenhagen Post*, 2 November 2026 (https://cphpost.dk/2026-11-02/news/round-up/denmark-seeks-eu-approval-to-introduce-social-media-age-limit-of-15/).

48 'Cyprus to submit social media age limit bill to parliament in December', *Cyprus Mail*, 17 September 2026 (https://cyprus-mail.com/2026/09/17/cyprus-to-submit-social-media-age-limit-bill-to-parliament-in-december).

49 'Wijziging mediadecreet: bescherming minderjarigen bij tussenhandeldiensten die lichamelijke, geestelijke of morele ontwikkeling kunnen aantasten' [Change in media decree: protection of minors in brokering services that may affect physical, mental or moral development], Flemish Government, 26 June 2026 (https://www.vlaanderen.be/Decision/6A3D0D842AAC1320B6A17F8E).

Country	Status (as of 2 November 2026)	Proposed age (years)	Parental consent	Age verification	Key dates and next step
Germany[50]		13	Graduated	EU digital identity wallet from 2027	Key points adopted by cabinet on 14 October 2026 (policy outline, not a bill); transitional until an EU age applies
Sweden		15	None	Not specified	Inquiry report SOU 2026:35 published on 2 June 2026; final report due 14 November; proposed start on 1 January 2028; no new government by mid-October after the 13 September election
Netherlands[51]		15	None	Not specified	Coalition agreement on 30 January 2026; Dutch–Spanish non-paper for an EU rule 11 September
Poland	Governing-party plan	15	None	mObywatel	MPs' bill announced in January 2026, not filed; target early 2027

50 'Kinder- und Jugendschutz in der digitalen Welt verbessern' [Improving child and youth protection in the digital world], Bundesregierung, 14 October 2026 (https://www.bundesregierung.de/breg-de/aktuelles/kabinett-eckpunkte-jugendmedienschutz-2456960).

51 'Kabinet pleit in Europa voor minimumleeftijd voor sociale media' [Cabinet calls in Europe for minimum age for social media], Rijksoverheid, 11 September 2026 (https://www.rijksoverheid.nl/actueel/nieuws/2026/09/11/kabinet-pleit-in-europa-voor-minimumleeftijd-voor-sociale-media).

Country	Status (as of 2 November 2026)	Proposed age (years)	Parental consent	Age verification	Key dates and next step
Finland		15	Not decided	Not specified	Working group 1 March to 31 December 2026
Slovenia[52]		15	Not specified	Not specified	Guidelines issued 5 February 2026; new government backs an EU-wide under-15 age limit (17 September)
Ireland[53]		16	Not specified		Strategy commitment on 18 February 2026; EU route preferred, national backstop
Spain (Congress of Deputies 2025)[54]	Bill lapsed	16	Not specified	Not specified	Bill tabled on 27 March 2025; lapsed on parliament dissolution 6 October 2026; election 29 November

52 'Ministrstvo za starostno mejo 15 let pri uporabi družbenih omrežij' [Ministry on the age of 15 years in the use of social networks], Government of Slovenia, 17 September 2026 (https://www.gov.si/novice/2026-09-17-ministrstvo-za-starostno-mejo-15-let-pri-uporabi-druzbenih-omrezij/).

53 'Ireland ready to restrict social media for children even without EU agreement, Minister says', *The Irish Times*, 16 June 2026 (https://www.irishtimes.com/politics/2026/06/16/ireland-ready-to-restrict-social-media-for-children-even-without-eu-agreement-minister-says/).

54 'El BOE publica la disolución de las Cortes y la convocatoria de elecciones generales' [The BOE publishes the dissolution of the Courts and the call for general elections], RTVC, 6 October 2026 (https://rtvc.es/boe-publica-disolucion-cortes-y-convocatoria-elecciones-generales-6-octubre-2026/).

Country	Status (as of 2 November 2026)	Proposed age (years)	Parental consent	Age verification	Key dates and next step
Malta[55]		13, floated	Not specified	Not specified	Restrictions announced 19 October 2025; consultation from 4 December 2025 to 27 February 2026
Czechia	Public debate	15, floated by the prime minister	None	None	Prime minister backed a ban in February 2026; ministry decision by end-2026
Latvia	Public debate	None	None	None	Coalition plan of 11 March 2026 lapsed with the government; election 3 October 2026
Croatia	Public debate	None	None	None	Opposition bill (age limit of 15 years, with consent), opposed by the government, March 2026
Estonia[56]		None	None	None	Did not sign the Jutland Declaration (October 2025)

Sources: EPICENTER network survey, national parliamentary records, TRIS notifications, and government announcements; Regeringen (2026)

55 'Consultation on social media reform', NL-0042-2025, Government of Malta, 4 December 2025 (https://www.gov.mt/en/publicconsultation/Pages/2025/NL-0042-2025.aspx).

56 'Don't ban children from social media', *The Star*, 2026.

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