

Non-paper by Greece, France and Spain

Title: Protecting Minors from Online harms and risks: Age verification, age-appropriate design and a pan-European digital age of majority

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Europe is facing an issue of intergenerational responsibility that demands collective action on the European level. The protection of minors from Internet harms and risks. The intent of this non paper is neither to criminalize the use of technology, nor to propose unenforceable solutions to an ever-growing challenge. Anywise, the modern digital era has provided us with unprecedented opportunities. Technology has opened new paths for learning, communication, creativity, and entertainment. It has simplified our daily lives, improved our communication, made knowledge more accessible to everyone, and strengthened our engagement with the state.

However, this progress comes with challenges, especially for our children, who are at the center of a new form of harmful imbalance. This imbalance is expressed through the dynamics of digital platforms, whose algorithmic mechanisms design environments that capture users' attention and increase their exposure to addictive designs and often harmful contents and contacts. Poorly designed digital products and services can lead to heightened anxiety, depression, and self-esteem issues as minors are constantly exposed to trivial or comparative contents, while excessive screen time can limit the development of critical skills, alter cognitive capacities, weaken human relationships, and diminish the ability to collaborate effectively.

It is true that Europe has not stood idly by. The GDPR recognizes that minors personal data merit additional protection and several states have adopted best practices in relation to minors and data protection. We have developed the European Strategy for a Better Internet for Kids (BIK+), focusing on safe digital experiences and empowerment, while the “Digital Services Act” (DSA), our cornerstone legislation, demands specifically that Very Large Online Platforms (VLOPs) become more accountable and transparent. It requires all platforms to ensure a high level of privacy, safety and security for minors and forbids the profiling of minors for advertisement purposes. VLOPs are additionally required to assess and mitigate systemic risks to the rights of minors and to their physical and mental health.

We recognize and congratulate the European Commission's effort to address these issues through the recently proposed guidelines for Article 28 of the DSA and strongly call on them to take the opportunity and ensure that the proposals of this paper are duly implemented and respected by platforms and social networks. Indeed, we believe that they must become core obligations in order to protect minors online.

While the above set a global standard for protecting minors online, there is still much work to be done. Greece, France and Spain have identified three major challenges that we need to tackle. First, the imperative for establishing in Europe the principle of a digital-age majority for online social networks. Then, the lack of proper & widespread age-verification mechanisms that are properly enforced and the enactment of a regulatory framework that sets mandatory technical standards for safe, private, non-addictive interfaces in platforms by design as well as limits the irresponsible use of social media in particular.

Greece recently presented its National Strategy for the Protection of Minors from Internet Addiction, which is built upon a holistic framework of actions and initiatives structured around three key pillars. Informing parents around already existing tools for parental control, providing a set of governments-issued tools (KidsWallet) to harness overuse and regulatory initiatives on the European and National level.

France, for its part, has enacted a first legal and technical framework that requires adult-content platforms to operate a robust and privacy-compliant age-verification mechanism for the access to the service.

Spain has approved a draft bill to protect minors in digital environments that introduces different provisions, such as mandatory parental controls and digital education programs. "Cartera Digital Beta", a robust, secure and privacy respectful age verification solution fully aligned with eIDAS2, has also been developed.

On the technical front and in order to combat the issue of age verification, several initiatives are on the way. The European Commission has launched the "mini-wallet" pilot to develop a device-based age verification solution, designed to support online platforms in securely verifying user age. We propose adopting an EU-wide application that supports parental control mechanisms, allows for proper age verification and limits the use of certain applications by minors. The tools under development can serve as models and contribute for a pan-European solution.

On the regulatory front and in order to combat addictive designs as well as enact a regulatory framework that complements technical solutions, we propose:

- Mandatory and built-in age verification solutions and parental control software to all devices with Internet access that will be available in the European market.
- The introduction of a European “Digital Majority Age” for access to online social networks.
- European Norms that will mandate age-appropriate designs, thus minimizing addictive and persuasive architectures (eg. Pop-ups, profile personalization, video autoplay).

Finally, we must complement the initiatives with sustained efforts to foster digital and media literacy and critical thinking skills among minors, parents, and educators, empowering them to navigate the online world more safely and consciously, and providing them with effective tools to prevent the negative effects of disinformation.

These initiatives represent only part of our European strategy, as we understand this is not merely a matter of policy. It is an ethical responsibility towards the next generation. As platforms around the world make policy decisions that might encourage the spread of disinformation and harmful content, we need to make sure that the digital world can remain a place that offers boundless opportunities and can act as an ally for growth and creative expression, not a threat to the health and well-being of our minors.

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