

Follow-up to the European Parliament non-legislative resolution of 26 November 2025 on the protection of minors online

- 1. Rapporteur:** Christel SCHALDEMOSE (S&D / DK)
- 2. References:** 2025/2060(INI) / A10-0213/2025 / P10_TA(2025)0299
- 3. Date of adoption of the resolution:** 26 November 2025
- 4. Competent Parliamentary Committee:** Committee on Internal Market and Consumer Protection (IMCO)
- 5. Brief analysis/ assessment of the resolution and requests made in it:** The Commission welcomes the European Parliament's resolution on the protection of minors online. The resolution sends a strong message underscoring the European Union's commitment to the safety and wellbeing of children online, in full respect for children's rights in the digital environment. The Union is at the forefront of the protection of minors online and the Commission is dedicated to continuing its efforts in collaboration with the European Parliament.
- 6. Response to requests and overview of actions taken, or intended to be taken, by the Commission:**

Enforcement of the Digital Services Act (paragraphs 4, 7, 9, 29, 34, 36, 39, 45, 52, 56, 57, 63, 68, 73)

The Commission is fully dedicated to the enforcement of the Digital Services Act (DSA) and the protection of minors online. In that light, it has opened proceedings against the providers of TikTok, Instagram and Facebook regarding the harmful impact of algorithms and addictive design on minors, among others. In February 2026, the Commission preliminary found TikTok in breach of the DSA for its addictive design, including features such as infinite scroll, autoplay, push notifications and its highly personalised recommender system. The Commission has also opened proceedings against the providers of Pornhub, Stripchat, XNXX, and XVideos, focusing on the risks for the protection of minors, including those linked to the absence of effective age verification. The investigations are ongoing, respecting due process throughout. The Commission recalls that risks stemming from financial scams are also part of certain ongoing investigations.

In 2025, the Commission adopted Guidelines on measures to ensure a high level of privacy, safety and security for minors online pursuant to Article 28(4) of the DSA. The guidelines outline measures that providers of online platforms, as online intermediaries, can take to comply with Article 28(1) of the DSA. The guidelines address inter alia age assurance, default settings, interface design including safeguards on certain AI features, recommender systems, moderation, reporting, tools for guardians, governance, terms and conditions and commercial practices including certain loot boxes, virtual currencies and in-app

purchases, as well as practices that can lead to excessive, impulsive or unwanted spending or addictive behaviours. Given the rapid evolution of technology and societal norms, an evaluation of the guidelines is foreseen for 2026, which may lead to revisions to address emerging challenges and incorporate new insights.

In particular, the guidelines recommend that providers of online platforms accessible to minors have clear, easily identifiable and accessible support tools that allow minors to seek help, including providing block and mute buttons, and that such support tools be child-friendly, clearly visible, immediately accessible and connect minors with support services such as those that form part of the national EU co-funded Safer Internet Centres. The guidelines also recommend that parental control tools put in place by providers of online platforms accessible to minors should apply regardless of the device or operating system used to access the service as well as be compatible with interoperable 'one-stop-shop tools' for guardians gathering all settings and tools. Among several recommendations on recommender systems, the guidelines mention that providers should "ensure that, if a recommender system relies on the processing of behavioural data about a minor, the suggestions of specific information to minor recipients of the service or the prioritisation of that information does not rely on the processing of behavioural personal data that is so extensive as to capture all or most of the minor's activities on the platform".

The Commission took its first investigatory steps after the adoption of the guidelines and used its enforcement powers vis-à-vis providers of very large online platforms (VLOPs) to request information on how the Snapchat, YouTube, Apple Appstore and Google Play services protect minors online.

In the context of investigations, in cases where infringement persists, causing serious and urgent harm, the Commission may, according to Article 82 of the DSA, request the Digital Services Coordinator (DSC) of the provider's Member State of establishment to request that the competent judicial authority order the service's temporary restriction of access.

The Commission recalls that the DSA applies to companies active in the videogame industry insofar as these qualify as online platforms. The Commission also recalls that the application of Article 28(2) of the DSA is a responsibility of national authorities with regards to those intermediaries that are not very large online platforms or very large online search engines (VLOSEs), and that Article 28(2) does not as such prohibit all advertising to children. The resolution emphasises the importance of risk assessment and audit reports. The Commission treats the enforcement of the risk assessment and mitigation obligations with the utmost seriousness. The risk assessments clearly lead to improvements, and the Commission expects providers to continue improving. The risk assessment reports are also published by the providers, to ensure transparency and allow public scrutiny. Where the Commission considers that risk assessments are not diligent, or that risk mitigation measures are not effective, proportionate and reasonable, it

may make use of its enforcement powers, as it is doing in several ongoing proceedings.

The Commission, in cooperation with the Digital Services Coordinators (DSCs), may issue guidelines to present best practices and recommend possible measures for relevant providers to comply with obligations to mitigate systemic risks. The recently published report – pursuant to Article 35(2) DSA on the most prominent and recurrent systemic risks reported by providers or identified through other information sources – of the European Board for Digital Services, in cooperation with the Commission, contributes to the understanding of systemic risks and mitigation measures.

In October 2023, the Commission published a delegated act detailing the framework for the preparation and issuance of audit reports and audit implementation reports.

Enforcement of the Audiovisual Media Services Directive (paragraphs 4, 54, 57, 63, 67, 69), including audiovisual commercial communications, targeted advertising, influencers.

The Commission continues to monitor closely the national implementation of the Audiovisual Media Services Directive (AVMSD) by the Member States.

Some key relevant provisions address elements underlined by the Parliament such as targeted advertising (paragraphs 54-57), or audiovisual commercial communications by influencers. Article 9 and Article 28b(3) AVMSD lay down limitations on audiovisual commercial communications to minors and prohibit the processing of personal data of minors collected by video-sharing platforms for direct marketing, profiling and behaviourally targeted advertising purposes.

Regarding influencers, to the extent that influencers provide audiovisual content and are considered as media service providers, they fall under the AVMSD and are thus subject to the obligations related to audiovisual commercial communications, including the prohibition of surreptitious audiovisual commercial communications, and the rules on protection of minors.

Importantly, the evaluation of AVMSD is ongoing and the update of the media rules is foreseen for Q3 2026 in the 2026 Commission work programme. The above rules will be assessed, including the coherence with other EU legal instruments, and the Commission will consider whether any shortcoming should be addressed, including as regards the protection of minors online.

Enforcement of consumer law (para 6 and 13)

The Commission shares the Parliament's view with respect to the importance of robust enforcement of consumer legislation, including of the [Unfair Commercial Practices Directive](#) (UCPD). Effective

enforcement and redress are among the priorities of the 2030 Consumer Agenda.

In 2025, the Commission published the Consumer Protection Cooperation (CPC) Network's common position on Star Stable Online, where a number of harmful practices such as direct exhortation to children, other aggressive practices and misleading influencer marketing have been identified. In its support role, the Commission will continue to support any joint enforcement actions carried out in the video game sector by national consumer protection authorities at EU level. The Commission will also continue to facilitate the dialogue between the CPC Network and the video game industry, notably regarding the implementation of the CPC Network Key Principles on In-Game Virtual Currencies, to ensure that video game developers and publishers comply with existing EU consumer legislation. This is to create a safer and more transparent experience for players, in particular minors.

Furthermore, the Commission notes the Parliament's call to propose a revision of the CPC Regulation to ensure that the Commission has centralised investigative and enforcement powers across the EU in cases of widespread infringement of EU consumer laws. As announced in the 2023 Consumer Agenda, the Commission will propose a revision of the CPC Regulation in the fourth quarter of 2026. In preparing the revision, the Commission will assess the need for centralised investigation and enforcement powers at EU level in specific cases and how to further strengthen coordination among national authorities.

Digital Fairness Fitness Check and the upcoming Digital Fairness Act (para 14, 36, 37, 38, 39, 42, 43, 44, 45, 47, 48 49, 52, 54, 55, 56, 58, 61, 64, 65, 66, 67)

The Commission shares the Parliament's objective and sense of urgency on filling the gaps in current EU legislation to strengthen the protection of minors. In October 2024, the Commission published the findings of the Digital Fairness Fitness Check of EU consumer law. The Fitness Check identified a number of shortcomings and problematic practices in the digital environment, including in areas highlighted by the European Parliament in this resolution, that point to the need for action at EU level to fill gaps in consumer protection, reduce legal uncertainty for businesses, prevent regulatory fragmentation and facilitate enforcement while avoiding overlaps and duplication with existing legislation, in particular the digital rulebook.

As announced in the 2026 Commission Work Programme, the Commission is currently working on a proposal for a Digital Fairness Act (DFA), planned for the fourth quarter of 2026. The Digital Fairness Act will aim to further strengthen, where not already covered by existing legislation, the protection of consumers online against practices such as: dark patterns that can unfairly influence consumer decisions; addictive design features; problematic commercial practices by

influencers; unfair personalisation that takes advantage of consumers' vulnerabilities and problematic features in digital products.

The DSA has increased the protection of consumers, including minors, and the DFA will explore how to further keep this protection in areas not covered by the DSA, ensuring consistency and avoiding overlap.

In addition, the Commission takes careful note of:

- the Parliament's call to effectively tackle addictive design in all online services and for all ages in the review of consumer protection law, as well as for the effective enforcement of existing provisions under the DSA that address addictive and welcoming of investigations under the DSA focusing on addictive behaviour, and for ambitious action at EU level in this regard. As highlighted in the 2030 Consumer Agenda, the Commission shares the view that children's exposure to harmful practices and features in digital products and algorithms designed to exploit their vulnerabilities and foster addiction raises concerns that require further scrutiny;
- the Parliament's call to address dark patterns by reviewing the list of unfair commercial practices under Annex I to the Unfair Commercial Practices Directive in order to close further legal gaps;
- the Parliament's concerns with respect to video games that encourage unwanted spending and its call on the Commission to guarantee a high level of protection for minors who play video games, in particular with regard to loot boxes and other randomised content, risks linked to paid virtual currencies, micro-transactions, pay-to-progress and pay-to-win mechanisms;
- the Parliament's call to introduce DSA-equivalent obligations to protect minors from personalised advertising that would be applicable to all other digital services and traders;
- the Parliament's call to address the lack of transparency about the paid promotion of products by social media influencers and the promotion by influencers of products that may put minors at risk, including as regards the role of brands and other actors in the influencer marketing chain.

As part of the preparatory work for the Digital Fairness Act, the Commission will rigorously assess if the bar of consumer protection needs to be further improved in these issues, ensuring consistency with existing legislation and avoiding overlaps. It will pay particular attention to minors, as these practices can be particularly harmful for children.

Age assurance (para 17, 18, 19, 24, 25)

The Commission agrees with the Parliament on the importance of effective age assurance mechanisms to protect minors in the online environment. In this regard, it should be reiterated that the AVMSD requires Member States to ensure that audiovisual media service

providers and video-sharing platform providers under their jurisdiction protect minors from content that might impair their physical, moral or mental development, including through establishing and operating age verification systems (Articles 6a(1) and 28b(3)(f), respectively). Additionally, the Commission has [published technical specifications](#) for a harmonised EU age verification solution. The EU age verification solution will also support the implementation of the DSA provisions to protect minors online. Its technical specifications are meant to ensure interoperability and become a compliance example and reference standard, fulfilling the requirements for age assurance solutions referred to in the aforementioned Commission guidelines on the protection of minors. The EU age verification solution is designed to meet the highest data protection and privacy standards. It does not allow for identity tracking and prevents linkability of transactions. Work is also specifically ongoing to integrate and offer zero-knowledge proof technology with the solution.

The solution is being piloted in several Member States. When the EU Digital Identity Wallet becomes available at the end of 2026, the solution will offer a way to make the age verification functionality available to all EU citizens.

The Commission guidelines on the protection of minors under the DSA call for all age assurance methods put in place by providers of online platforms accessible to children to be accurate, reliable, robust, non-intrusive and non-discriminatory.

With regard to other pieces of EU legislation on this matter, the Commission recalls that it has published an in-depth report pursuant to Article 91 DSA on the way the Regulation interplays with other legal acts.

Addressing challenges brought by AI technologies (paragraphs 73, 75)

The Commission acknowledges that AI technologies might pose specific risks to children. The aforementioned Commission guidelines on the protection of minors under the DSA call for the introduction of safeguards around AI systems and features integrated in online platforms accessible to minors. Those safeguards include technical measures to warn minors that interaction with an AI feature is different from human interaction and that the information provided might be factually inaccurate and misleading. In October 2025, the Commission asked the providers of Google Play and App store what measures they have put in place in order to ensure that minors could not access age-inappropriate content, including so called ‘nudify’ apps. Furthermore, AI features such as chatbots could be in scope of the DSA if integrated into a service that is designated under the DSA. The Commission has for example sent X a request for information to inquire about its AI chatbot Grok, including questions on risks and risk mitigation linked to how Grok is used as part of X, and has requested X to retain documents on the integration of Grok in its recommender systems. In January 2026,

the Commission launched a new formal investigation against X regarding the deployment of Grok functionalities, notably in relation to the dissemination of illegal content, such as manipulated sexually explicit images, including content that may amount to child sexual abuse material. The Commission also shares the view of the European Parliament that the Artificial Intelligence Act (AI Act) is a particularly relevant legal framework whose proportionate risk-based rules can address AI risks for minors. Particularly relevant are the rules on transparency in Article 50 for AI systems designed to interact with natural persons (such as chatbots) and the requirements for marking and labelling of AI-generated and manipulated content (including deep fakes), which will apply from 2 August 2026, in order to mitigate some of the concerns related to their misleading nature. The Commission is facilitating compliance with these obligations through, among others, the development of a Code of Practice on marking and labelling of AI-generated content. In addition, the AI Act tackles risks stemming from **general-purpose AI models**, including the most powerful ones that pose **systemic risks**. Besides a number of transparency obligations, providers of the most powerful models need to assess and mitigate systemic risks, including risks to safety and fundamental rights (e.g. risk of harmful manipulation or the generation and dissemination of harmful content), that can propagate at scale across the value chain. The Commission approved a Code of Practice for general-purpose AI models as a voluntary tool to facilitate compliance with these obligations, which was signed by major AI providers. The enforcement powers of the AI Office will become effective as of 2nd August 2026. -

The Commission has also analysed whether the prohibitions of AI systems that deploy purposefully manipulative or deceptive techniques, or exploit vulnerabilities due to age, disability, or a specific socio-economic situation causing significant harm could cover AI systems producing child sexual abuse material and non-consensual sexually explicit images. The Commission conclusion would be that these practices are not covered.

Coordination with Member States (paragraphs 12, 81)

The Commission cooperates and coordinates with Member States in the enforcement of the DSA and works closely with national authorities, including in the context of the European Board for Digital Services (the Board). In particular, the working group “Working together” is tasked with the topic of Cross-border cooperation and a dedicated working group on the topic of protection of minors online has been established.

The aforementioned Commission guidelines on the protection of minors under the DSA aim at fostering a coordinated and consistent enforcement of Article 28 across all Member States, and Member States’ authorities were involved in their development. In 2025, the Board also launched a joint action against pornographic platforms taking steps alongside the Commission, and on 23 September 2025, the

Board asked its working group on the protection of minors to continue its work on the implementation of the guidelines with the aim to streamline enforcement efforts, strengthen cross-border collaboration and achieve a high-level of protection across the EU. The Board will continue to help the Commission to establish a harmonised approach to age assurance and the protection of minors. For this purpose, and considering the relevance of age assurance for other legal frameworks, the Board involves a representative of the Media Board as well as one of the European Data Protection Board in discussions on this topic.

The Commission recalls that DSCs cooperate and coordinate with the Consumer Protection Cooperation (CPC) network at meetings of the Board's working group on the interplay of the DSA with consumers protection legislation. Commission services also cooperate, for instance in the actions conducted by the CPC network and DSA enforcement services, and the Commission encourages the creation of national task forces which have been already established in certain Member States.

For the AI Act implementation, the collaboration with the Member States is taking place in the context of the AI Board, which has set up multiple subgroups on prohibitions, high-risk, transparency, general-purpose AI and an Administrative Cooperation Group on market surveillance. On education, the Commission shares the concerns of the European Parliament. Several EU initiatives target education, such as the Erasmus+ and the Digital Education Action Plan. The Commission is facilitating exchange of good practices across the EU on online safety and digital literacy, targeting children, educators and carers via the co-funded network of Safer Internet Centres and the Better Internet for Kids (BIK) platform. The Commission is also gathering evidence and practices from around the EU on the impact of mobile phone bans in schools across Europe.

Engagement with parents, whistleblowers, external stakeholders and experts (paragraphs 10, 40)

The Commission actively engages with the network of Safer Internet Centres, (SICs), which are a key asset for the Better Internet for Kids Strategy (BIK+) as well as for supporting the implementation of the DSA and of the new action plan against cyberbullying. The SICs offer awareness raising resources, and typically a helpline to get support on problematic online issues and a hotline to report anonymously suspect child online abuse material across the Member States. The hotlines are part of the global INHOPE network, present in 52 countries worldwide to allow swift action against child sexual abuse material. The SICs count on over 20 years of experience and direct outreach to over 46 million in 2025, including direct contact with children of all ages, parents, teachers and educators. The funding provided by the Commission, currently via Digital Europe Programme, also aims at enabling the Safer Internet Centres to raise awareness regarding specific and general emerging risks including online challenges and trends. In 2025, the Commission also held the DSA for YOUTH Campaign to inform young people, parents and educators about the aforementioned DSA guidelines

on the protection of minors online. It brought together a range of resources including family-friendly booklets to help understanding the DSA under the protection for minors angle.

The Commission provides funding as well to Child Helpline International to support children in various situations, including when they are cyberbullied or face other type of online violence.

The Commission agrees with the European Parliament as to the importance of engaging with whistleblowers. The DSA Whistleblower tool is designed to enable employees and other insiders to report harmful practices of VLOPs/VLOSEs anonymously.

Regarding the AI Act, the AI Office has also launched a whistleblower tool for reporting of harmful practices and non-compliance by providers of general-purpose AI models. Collaboration with stakeholders will be institutionalised with the set-up of the Scientific Panel (involving independent scientific experts) and the Advisory Forum (involving representatives from various stakeholder groups, including industry, academia, civil society etc.). The Commission launched in 2025 a call for expression of interest inviting interested stakeholders and experts to apply. The Commission is concluding the selection of the experts for both the Scientific Panel and the Advisory Forum, so they can become operational in the coming months.

Strengthening the legal framework for the protection of minors online (paragraphs 13, 14, 17, 19, 36, 39, 40, 44, 45, 49, 51, 52, 54, 55, 56, 66, 67, 69)

The Commission welcomes the European Parliament's resolution mandate for the EU's ongoing evaluation and legislation efforts. The Commission underlines that the protection of minors online must be grounded in a rights-based approach, in line with Article 24 of the Charter of Fundamental Rights of the European Union and the UN Convention on the Rights of the Child. Children are rights holders in the digital environment, and their best interests must be a primary consideration in the implementation and enforcement of relevant EU legislation. The Commission will continue to assess options to strengthen the existing framework to ensure the safety and wellbeing of minors online:

1. In Q3 2026, the Commission will present an evaluation report and possible proposals for review of the Audiovisual Media Services Directive (AVMSD). This will include analysing the impact and application of the measures aimed at protecting minors from illegal or harmful content made accessible by video sharing platform providers, and in relation to content made available by influencers. This exercise will also consider whether more needs to be done in order to better protect minors online from harmful content.
2. The Commission will propose a revision of the CPC Regulation in the fourth quarter of 2026. In preparing the revision, the Commission will assess the need for centralised investigation and enforcement

powers at EU level in specific cases.

3. As a follow-up action to the Fitness Check of EU consumer law on digital fairness published in 2024, the Commission is working on a proposal for a Digital Fairness Act (DFA). The proposal seeks to complement and reinforce the EU digital rulebook by addressing remaining gaps and areas of legal uncertainty in consumer protection without any overlapping or duplication.
4. Following on the State of the Union Speech, Commission President von der Leyen announced an expert panel to advise on the best approach for Europe to protect children online. The Commission is working to establish this panel of experts, ensuring that it can provide independent and evidence-based advice, taking account of different positions and perspectives on social media restrictions, including those of all relevant stakeholders including parents, teachers, civil society, industry, Member States, children and young people.
5. The EU-wide enquiry on the impact of social media on health and well-being, as announced in the Commission's political priorities, will complement existing research and ensure evidence-based developments in this area. It will focus on young people.
6. The Commission is committed to strengthening the legal framework to prevent and combat child sexual abuse and exploitation, including in the online environment. The proposed Regulation on preventing and combating child sexual abuse, currently under interinstitutional negotiations, would establish obligations for companies to take responsibility for preventing the dissemination of child sexual abuse material and the online grooming of children on their services. It would also create an EU Centre to prevent and combat child sexual abuse as a new EU agency. In addition, on 6 February 2024, the Commission presented a proposal to recast Directive 2011/93/EU on combating child sexual abuse and sexual exploitation. The revised rules aim to ensure that all forms of child sexual abuse and exploitation, including those enabled or facilitated by technological developments, are effectively criminalised. The proposal also seeks to strengthen provisions on investigation and prosecution and to introduce more specific requirements concerning prevention and victim support.
7. As announced under the ProtectEU Internal Security strategy, the Commission will develop an Action Plan for the Protection of Children Against Crime, focusing on both offline and online dimensions. The Action Plan will address situations where children could come into contact with the criminal justice system as both victims and alleged perpetrators, with a focus on prevention and child-friendly responses

The Commission looks forward to continuing its close collaboration with the European Parliament to ensure that children grow in a safe and empowering online environment.

Media and digital literacy and education (para 81-82)

The Commission agrees with the Parliament on the importance of strengthening media and digital literacy with a view to empower young people to make informed and responsible choices online. A strong foundation laid out already at school helps foster curious, critical and constructive citizens, who have a solid basis that adapts to the technological and regulatory developments. To this end, the Commission's ambition to establish education as a core place where media and digital literacy is fostered is stronger than ever. The Commission has put targeted efforts in this regard as concerns:

1. The Union of Skills offers a comprehensive vision to ensure that all Europeans have the skills needed today. The Action Plan on Basic Skills complementing the Union of Skills identifies digital and citizenship skills on equal footing with 'traditional' basic skills, such as literacy, mathematics and science. Media and digital literacy closely linked to digital and citizenship skills, is now a core part of the skillset needed in 21st century.
2. As part of the Digital Education Action Plan, in 2022, the Commission published Guidelines for teachers and educators on tackling disinformation and promoting digital literacy, offering practical and targeted support in all EU official languages. Building on their success, updated Guidelines will be published shortly aiming to address latest developments, such as generative AI, social media and influencers. The Guidelines will also offer a chapter for policymakers and school leaders, as well as several detailed lesson plans which will also address cyber-bullying.
3. Furthermore, in May 2025, in cooperation with the OECD, the Commission published a draft AI literacy framework for primary and secondary education aiming to offer a common understanding of what the competences young people need to critically engage and use the technology. The framework will be finalised before the summer and made available in all EU official languages. It will also inform the 2029 PISA assessment on media and AI literacy, offering an important opportunity to measure progress.
4. Also, the work of the eTwinning community, the European School Education Portal and the Erasmus+ programme supports teachers, educators and parents across the EU daily.
5. Delivering on the Union of Skills and as part of an ambition Education Package, the Commission will launch a 2030 Roadmap on the future of digital education and skills. The Roadmap will aim at translating Europe's digital education priorities into a focused set of

impactful measures that support learners, teachers and institutions. It will look into a more systemic-wide approach towards strengthening the role of education and training in boosting digital and media literacy, building resilience toward disinformation in a sustainable manner, and advancing AI literacy building on the AI literacy framework.