



# The Limits of Age-Based Restrictions

Implications for Online Safety Policy

## ISSUE BRIEF

### Background

While digital technologies offer some learning and social benefits, the largely unregulated operation of major digital platforms in Canada has caused significant harm to the physical and mental health of children and youth. **Canadian physicians have identified clear associations between increased social media use and adverse health outcomes in young people**, including depression, anxiety, psychological distress, and sleep disruption<sup>1,2</sup> as well as heightened risks of online victimization, including bullying, harassment and sextortion.

To mitigate these harms, peer nations have established independent online safety regulators with meaningful enforcement authority, mandating child risk assessments and implementing age-appropriate design codes for platforms. Several leading international jurisdictions have also implemented age-based restrictions designed to delay youth access to social media. On both fronts, Canada currently lacks comparable protections. The federal government is considering a suite of online safety measures to better protect children and youth, with age-based restrictions emerging as a prominent policy option. To inform evidence-based policy decisions, the potential benefits, limitations and implementation challenges of age-based restrictions must be carefully assessed.

### Social Media and the Adolescent Brain

While no age group is immune to the harms associated with online technologies, children and youth have unique developmental vulnerabilities that warrant targeted protections.<sup>3</sup>

Adolescence, broadly spanning puberty to the mid-twenties, is a critical period of social, emotional and intellectual development marked by profound biological changes in brain structure and function. During this time, youth may test limits, risk-taking increases, and sensitivity to peer feedback intensifies.<sup>4</sup> At the same time, higher-order cognitive capacities—such as planning, judgment and self-regulation—are still developing. This mismatch creates a dynamic developmental window that shapes how young people respond to their environment, including digital spaces.<sup>5</sup>

Hormonal shifts at the onset of puberty drive these changes and initiate a period of intensive brain remodeling, often called ‘neuroplasticity’. Key features of this process are **myelination** and **synaptic pruning**, where frequently activated neural pathways are selectively strengthened while less-used connections are eliminated.<sup>6</sup> This is especially important in the **limbic system** – the network of brain regions involved in emotion, motivation and reward processing. As these circuits are refined, they become more efficient, but also more responsive to emotionally meaningful and rewarding experiences. As a consequence, adolescents are more likely to show heightened emotional reactions, seek out new experiences and be strongly influenced by social feedback.<sup>6,7</sup>

Because synaptic pruning strengthens the most often-used neural circuits, repeated experiences during this period can have lasting effects. Digital environments that provide rapid, frequent and highly salient social feedback reinforce patterns of attention, emotional response and impulse control in ways that are more impactful during adolescence than at other stages of life.

At the same time, the prefrontal cortex—the region of the brain responsible for higher order cognitive functions that modulate emotional responses, such as decision-making, impulse control and long-term planning—develops more gradually. This developmental asynchrony means that systems involved in reward and emotion are highly active before systems responsible for regulation are fully established. As a result, adolescents may be more sensitive to immediate rewards and peer validation, while having a more limited capacity to manage impulses or assess long-term consequences.

This body of evidence supports a clear conclusion: Children and adolescents are not simply “small adults” in a digital environment. Their heightened sensitivity to social reward, combined with still-developing self-regulatory capacity, creates a distinct, time-limited window of vulnerability. These developmental realities should therefore be explicitly considered in the design, governance, and regulation of social media platforms, particularly those features that amplify social reinforcement, encourage prolonged engagement, or intensify peer comparison.

Importantly, there is no precise age at which the brain becomes “fully mature”.<sup>5</sup> Rather, progress is gradual, with different brain systems maturing at different rates both within and between individuals. Rather than a sudden fixed endpoint, brain development reflects the ongoing integration of more stable emotional systems with increasingly effective cognitive controls, well into most individuals’ 20s.

## Potential Benefits Associated with Social Media Age Minimums

### Delaying Early Social Media Exposure to Mitigate Harms

Almost half of youth report using social media for more than three hours a day (“heavy social media use”). This level of use is associated with higher levels of psychological distress, with younger adolescents appearing particularly vulnerable.<sup>8</sup> **By limiting access to digital platforms, age-based restrictions may help minimize excessive use among younger users and, in turn, reduce health risks**—especially for those most vulnerable to social comparison, cyberbullying and algorithmic amplification of toxic content. Age-based restrictions during this sensitive period may also reduce exposure to environments that encourage compulsive use and reinforce maladaptive habits, supporting the development of healthier habits over time.

### Safeguarding Against Commercial Exploitation and Strengthening Privacy Protections

**Children and adolescents may lack the cognitive and emotional capacity to fully understand the consequences of algorithmic targeting** and are less able to provide meaningful consent to the collection and use of their data. Recognizing that the business model for many online platforms relies on extensive data collection and highly targeted behavioural advertising, age-based restrictions would align with well-established protections against commercial exploitation and established privacy principles for young people.<sup>9</sup>

## Facilitating Long-term Normative Shifts

Beyond the immediate benefits for current users, the broader impact of age-based social media restrictions may lie in shifting societal norms around appropriate social media use and the role of digital environments in the lives of young people. When children are not active on social media, it is less likely to function as a primary social hub.<sup>10</sup> Given that time spent in the digital world displaces other activities that support social and emotional learning and growth, reducing online exposure may yield wide-ranging benefits for wellbeing and growth.<sup>11</sup>

Recent media attention has focused on Australia's under-16 social media age ban; however, it will take time before evidence demonstrates the population-level effects of this policy.<sup>12</sup> Australia's eSafety Commissioner has announced a longitudinal study to track longer-term impacts, including mental health outcomes and the quality of peer relationships, which may take years to fully emerge.<sup>10</sup> While rigorous evidence is still accumulating, policy-level restrictions may help establish a clear societal standard, reducing the burden on individuals and families to independently determine and enforce rules for appropriate social media use for young people.

## Important Considerations in the Implementation of Age Restrictions

### Reducing Safety and Accountability for All

Age-assurance mechanisms have inherent limitations and risk functioning as superficial compliance measures rather than meaningfully enhancing safety.<sup>1,13</sup> A formal age ban may also reduce incentives for technology companies to invest in improving the safety of digital environments for both young people and adults.

**Genuine safety improvements require substantive design changes, including stronger platform accountability through safety-by-design measures,** with privacy-protective age-assurance mechanisms functioning as one component of a broader harm-reduction strategy in an evolving online world. Age-based restrictions may have unintended consequences for young people, including discouraging children who circumvent restrictions from seeking help from caregivers if they encounter harmful content online. They may also push youth towards higher risk, fully unregulated digital environments.

### Undermining Children's Access to Digital Participation and Access to Information

Broad age-based restrictions on social media may also undermine children's rights to participation and access to information. In appropriately structured and supported environments, digital platforms can offer meaningful opportunities for learning, social connection, and self-expression. These benefits may be particularly important for children and youth who are marginalized or living with health conditions, for whom in-person communities or supports may be limited or inaccessible. Policy approaches should therefore balance risk mitigation with the preservation of opportunities for healthy engagement, ensuring that efforts to enhance safety do not inadvertently restrict access to beneficial online experiences.

## Failing to Reliably Verify User Age

Though Canadian children under the age of 13 should not currently be able to register and access social media, these restrictions have proven ineffective in practice.<sup>14</sup> In a recent Canadian study, approximately half of children aged 7 to 11 reported using social media in the past month.<sup>14,15</sup> This reflects the broader absence of reliable, validated age-assurance systems capable of consistently verifying user age. Existing approaches remain limited by both accuracy challenges and potential privacy intrusions.

International experience further underscores these constraints. While the office of Australia's eSafety Commissioner reported that social media companies removed access to about 4.7 million under-age accounts following the introduction of its age-based restrictions, it also acknowledged that circumvention—including age falsification, spoofing<sup>i</sup>, use of VPNs or proxy tools to bypass restrictions and other adaptive strategies—will likely persist, particularly in the early implementation phase as the platforms' systems and processes evolve.<sup>16</sup>

## Oversimplifying the Developmental Trajectory

The minimum age at which an individual can legally provide their own permission for the collection and processing of their personal information—the digital age of consent—varies across jurisdictions, and the capacity for consent varies between individuals. Strict, arbitrary age limits fail to account for the complex biological and psychological vulnerabilities and strengths that exist on a spectrum throughout adolescence, and extend well beyond age 18.<sup>17</sup>

# From Risk to Regulation: A Path Forward for Canadian Children and Youth

During adolescence, heightened sensitivity to social feedback and reward cues means that online features such as algorithmic amplification, visible “likes,” follower counts, personalized recommendations and targeted advertising can significantly influence both behaviour and wellbeing, with distinct vulnerabilities extending into early adulthood.<sup>4-6</sup> Accordingly, delaying access to social media on the basis of age alone is unlikely to eliminate the substantial risks embedded in platforms by design. To achieve that, a comprehensive, safety-by-design approach is required. Recent Canadian polling shows broad support for holding platforms accountable for children's safety, as well as for establishing an independent public regulator to oversee social media companies.<sup>18</sup>

**As Canada considers next steps, age-based restrictions can be considered as one component of a broader, evidence-informed safety framework to address online harms, but only if it is centered on and implemented by an empowered independent regulator.**

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<sup>i</sup> The act of deliberately providing false information or using technical workarounds to circumvent age-verification systems, allowing underage users to access restricted digital platforms.

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