

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

Response Call for Evidence on guidelines to enforce the protection of minors online

Sector specific challenges and accelerators

CPME welcomes the European Commission initiative to issue guidelines on the protection of minors online, including a non-exhaustive list of good practices and recommendations for online platform providers to mitigate risks and ensure a high level of privacy, safety, and security for children.

European Doctors have called for an appropriate balance between the (increasing intensive) use of digital technologies, and the practice of health enhancing behaviours.¹ European Doctors noted that sufficient links had been found between internet use and mental wellbeing, and that digital technologies and social media were exacerbating feelings of anxiety and depression, disturbing sleep patterns, leading to cyber-bullying, body image troubles and disordered eating.² Screen time and online gaming were also a source of concern.³

CPME takes the opportunity to contribute further to the discussion, bringing to your attention the following additional studies:⁴

¹ [CPME Feedback on the Commission's Proposal for a Decision establishing the 2030 Policy Programme "Path to the Digital Decade"](#), points 3–4, 13 December 2021.

² Please see OECD, [Children & Young People's Mental Health in the Digital Age – Shaping the Future](#), 2018.

³ Please see World Health Organization. "[Guidelines on physical activity, sedentary behaviour and sleep for children under 5 years of age](#)". (2019); Armitage, Richard. "[Gambling among adolescents: an emerging public health problem.](#)" *The Lancet Public Health* 6, no. 3 (2021): e143.; Alan M Emond, Mark D Griffiths, [Gambling in children and adolescents](#), *British Medical Bulletin*, Vol. 136, Issue 1 (December 2020), p 21–29; Stavropoulos, Vasileios, Jeremy Vassallo, Tyrone Leonard Burleigh, Rapson Gomez, and Michelle Colder Carras, "The role of internet gaming in the association between anxiety and depression: A preliminary cross-sectional study." *Asia-Pacific Psychiatry* (2021): e12474.

⁴ These studies were presented by the Irish Medical Organisation to the Oireachtas Committee on Children, Equality, Disability, Integration and Youth – Protection of Children in the Use of Artificial Intelligence in May 2024.

- *“A 2018ⁱ study demonstrates that across the US that between 2010 and 2015, average levels of social-media use, depressive symptoms, and rates of suicide increased in lockstep, especially among females. Adolescents who spent more time on new media (including social media and electronic devices such as smartphones) were more likely to report mental health issues than adolescents who spent more time on non-screen activities. Related research shows that other indicators of poor mental health and psychological wellbeing have increased among teens and young adults since 2012, including dissatisfaction with lifeⁱⁱ and lonelinessⁱⁱⁱ.”*
- *Harmful content related to social media and suicide and self-harm include normalising of self-harm discussion of motivation or triggers, concealment, suicidal ideation or plans; and live depictions of self-harm acts.^{iv} [...]*
- *Recent research published by the WHO/Europe shows that 1 in 6 adolescents across Europe have experienced cyber-bullying up from 12%/13% in 2018.^v With both time spent on social media, and engagement in problematic use associated with both victimisation and perpetration.^{vi}*
- *A systematic review of 50 studies across 17 countries reveals that social media use is linked to body image issues, eating disorders/disordered eating, and poor mental health among young people.^{vii} This connection is mediating through pathways like social comparison, internalization of thin/fit ideals, and self-objectification. Social media trends and pro-eating disorder content, as well as appearance focused platforms and investment in photos strengthen this relationship.*
- *In terms of the addictive nature of social media, users commonly report experiences in their usage that mirror widely used criteria for establishing addiction, including the inability to reduce their use of social despite wanting to and withdrawal symptoms when they are unable to access social media.^{viii} In terms of social media addiction, it is estimated that 20% of adolescents may use social media for at least 5 hours daily.^{ix}”*

ⁱ Twenge JM, Joiner TE, Rogers ML, Martin GN. Increases in depressive symptoms, suicide-related outcomes, and suicide rates among US adolescents after 2010 and links to increased new media screen time. *Clinical Psychological Science*. 2018 Jan;6(1):3-17.

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- ⁱⁱ Twenge JM. *Generations: The Real Differences Between Gen Z, Millennials, Gen X, Boomers, and Silents—and What They Mean for America's Future*. Simon and Schuster; 2023 Apr 25.
- ⁱⁱⁱ Twenge JM, Haidt J, Blake AB, McAllister C, Lemon H, Le Roy A. Worldwide increases in adolescent loneliness. *Journal of adolescence*. 2021 Dec 1;93:257–69.
- ^{iv} Dyson MP, Hartling L, Shulhan J, Chisholm A, Milne A, Sundar P, Scott SD, Newton AS. A Systematic Review of Social Media Use to Discuss and View Deliberate Self-Harm Acts. *PLoS One*. 2016 May 18;11(5):e0155813. doi: 10.1371/journal.pone.0155813. PMID: 27191728; PMCID: PMC4871432.
- ^v Cosma A, Molcho M, Pickett W. A focus on adolescent peer violence and bullying in Europe, central Asia and Canada. *Health Behaviour in School-aged Children international report from the 2021/2022 survey. Volume 2*. Copenhagen: WHO Regional Office for Europe; 2024. Licence: CC BY-NC-SA 3.0 IGO.
- ^{vi} Craig W, et al. 2020 Social Media Use and Cyber-Bullying: A Cross-National Analysis of Young People in 42 Countries. *J Adolesc Health*. 2020 Jun;66(6S):S100–S108. doi: 10.1016/j.jadohealth.2020.03.006. PMID: 32446603.
- ^{vii} Dane A, Bhatia K. The social media diet: A scoping review to investigate the association between social media, body image and eating disorders amongst young people. *PLOS Global Public Health*. 2023 Mar 22;3(3):e0001091.
- ^{viii} Griffiths MD, Kuss DJ, Demetrovics Z. Social networking addiction: An overview of preliminary findings. *Behavioral addictions*. 2014 Jan 1:119–41.
- ^{ix} Zende D, Bowden-Jones H. Is excessive use of social media an addiction?. *Bmj*. 2019 May 15;365.