Abridged Submission

Submission on the "Inquiry into the harm young New Zealanders encounter online, and the roles that Government, business, and society should play in addressing those harms"

Dr Samantha Marsh

Senior Research Fellow, Public Health

School of General Practice and Primary Health Care, University of Auckland

25 July 2025

This submission responds to the Education and Workforce Committee's inquiry into the harm young New Zealanders encounter online, with a focus on social media, where the evidence is strongest, the harms most widespread, and the need for age-based protections increasingly clear. The term 'online harm' is too broad and varied for me to address effectively in a single submission.

Social media has consistently been shown in systematic reviews and meta-analyses to be associated with adverse outcomes for children and adolescents. Systematic reviews and meta-analyses are widely considered the gold standard in evidence synthesis.

SUMMARY OF RESEARCH

The overwhelming body of evidence, from systematic reviews, meta-analyses, and robust individual studies, consistently shows that social media use is harmful – not harmless – to the wellbeing of young people. As such, while social media is only one factor affecting youth mental health and wellbeing, it stands out as a highly modifiable risk, offering a powerful opportunity for meaningful change.

New Zealand Research

Social Media impacts on Pacific youth - Moana Connect Research, 2024[1]
- Pacific youth are more likely to experience cyberbullying/online social exclusion, receive requests for sexually explicit material, have their personal information posted without permission, and accidentally encounter disturbing material than their peers from other ethnic groups, as well as being more likely to download viruses/malware, when using social media.
- Limited positive impacts of social media were noted, such as access to avenues for challenging media bias and opportunities to maintain transnational connections.

"What we're watching" – Classification Office, 2022[1]

- Māori are more likely to experience racial abuse and harassment online.
- Māori are more likely than other groups to encounter online content promoting or encouraging violence towards others based on characteristics such as race, sexuality, or gender, as well as content related to violent extremism or terrorism.
- Māori and Pacific teens are more likely to report that they have received unwanted digital communication that negatively impacted their daily activities compared with other ethnic groups.

State of the Generation Survey – Youthline, 2023[2]

- 49% of young people view social media as a key issue facing their generation, with social media being the top issue reported among Pasifika youth.
- When asked where the best place to get support is, social media was ranked number 11, although young people said the best way for Youthline to reach them was through social media.
- When asked what types of support Youthline should offer, a social media platform was ranked 7th.

Unpublished University of Auckland survey

Data is from an online survey I undertook in 2019 of 358 NZ children aged 13-18. The survey explored teen behaviours and attitudes towards smartphones and social media. The survey was funded by a grant from the Health Research Council.

- 22% of respondents met the criteria for problematic social media use.
- The average number of hours of social media use per day was 4.06 hours.
- Māori respondents reported significantly greater daily social media use than [3]NZ European participants (5.0 versus 3.7 hours; $p<0.001$).
- 89% started using social media before the age of 16
- 42% started using social media before the age of 13
- 28% felt like they were on social media "almost constantly"
- 58% said they were on social media too much
- 94% of those who owned a smartphone said they use social media

International Research

Due to the inherent limitations of social media research (e.g. rapid changes in this field and the lack of a subjective measure of social media that adequately captures all aspects of use), any decisions about how to address the impact of social media on adolescent and child wellbeing

---

[1] Te Mana Whakaatu Classification Office. What we're watching New Zealanders' views about what we see on screen and online. Wellington, NZ: Te Mana Whakaatu Classification Office, 2022.
[2] Youthline. State of the Generation Report 2023, 2023.
[3] Laulu T, Taufa N, Gentles D, Fa'alili-Fidow J. The impacts of social media on the wellbeing of Pacific youth in New Zealand-A literature review: Social Media impacts on Pacific youth. *Pacific Health Dialog* 2024; **21**(11).

should rely, wherever possible, on systematic reviews and meta-analyses, and high-quality individual studies that are interpreted within the context of the totality of the evidence base[1].

Social media has consistently been shown in systematic reviews and meta-analyses to be associated with adverse outcomes for children and adolescents. Systematic reviews and meta-analyses are widely considered the gold standard in evidence synthesis.

Depression, anxiety, and psychological disease

- Social media has consistently been associated with depression[2][3][4][5], anxiety[6], and/or psychological distress[7][8][9] across multiple recent reviews.
- A recent meta-analysis found that for every extra hour of social media use, there was a 13% increase in the risk of depression in adolescents[10].
- Associations are significant, although they are often classified as 'small'.

Sleep issues

- Social media and smartphone use have been associated with later bedtimes, longer sleep onset latency, shorter sleep duration, insomnia, sleep problems, reduced sleep quality or sleep efficiency, and reduced daytime functioning or tiredness[11][12].
- A systematic review of cross-sectional studies showed significant associations between poor sleep quality and negative mental health[13].

[1] Abbasi K. A commitment to best practice in research methods and reporting. British Medical Journal Publishing Group; 2025.

[2] Vahedi Z, Zannella L. The association between self-reported depressive symptoms and the use of social networking sites (SNS): A meta-analysis. *Current Psychology* 2021; **40**: 2174-89.

[3] Cunningham S, Hudson CC, Harkness K. Social media and depression symptoms: a meta-analysis. *Research on child and adolescent psychopathology* 2021; **49**(2): 241-53.

[4] Yoon S, Kleinman M, Mertz J, Brannick M. Is social network site usage related to depression? A meta-analysis of Facebook–depression relations. *Journal of affective disorders* 2019; **248**: 65-72.

[5] Alonzo R, Hussain J, Stranges S, Anderson KK. Interplay between social media use, sleep quality, and mental health in youth: A systematic review. *Sleep medicine reviews* 2021; **56**: 101414.

[6] Piteo EM, Ward K. Social networking sites and associations with depressive and anxiety symptoms in children and adolescents–a systematic review. *Child and adolescent mental health* 2020; **25**(4): 201-16.

[7] Alonzon, 2021

[8] Keles B, McCrae N, Grealish A. A systematic review: the influence of social media on depression, anxiety and psychological distress in adolescents. *International journal of adolescence and youth* 2020; **25**(1): 79-93.

[9] McCrae N, Gettings S, Purssell E. Social media and depressive symptoms in childhood and adolescence: A systematic review. *Adolescent Research Review* 2017; **2**: 315-30.

[10] Liu M, Kamper-DeMarco KE, Zhang J, Xiao J, Dong D, Xue P. Time spent on social media and risk of depression in adolescents: a dose–response meta-analysis. *International journal of environmental research and public health* 2022; **19**(9): 5164.

[11] Alonzo R, Hussain J, Stranges S, Anderson KK. Interplay between social media use, sleep quality, and mental health in youth: A systematic review. *Sleep medicine reviews* 2021; **56**: 101414.

[12] Brautsch LA, Lund L, Andersen MM, Jennum PJ, Folker AP, Andersen S. Digital media use and sleep in late adolescence and young adulthood: A systematic review. *Sleep medicine reviews* 2023; **68**: 101742.

[13] Alonzon, 2021

Eating disorders and body image

- Social media is associated with poor body image and body satisfaction, depressive eating, eating disorders/disordered eating, and poor mental health[1][2].
  - These relationships appear to be mediated (explained) by the impacts of social media on social comparison, thin/fit ideal internalisation, and self-objectification[3].
- Highly visual social media use is shown to have a <u>strong</u> relationship with eating disorders and disordered eating[4].

Low self-esteem

- Social media use has consistently and significantly been linked with low self-esteem[5][6]; similar to depression, effect sizes tend to be small.

<u>Evidence linking problematic social media use/addiction with harm</u>

> While many studies are limited by how social media use is measured, which is typically based on 'hours of use', problematic social media use (PSMU) characterises use that has similarities with addiction-like symptoms or behaviours and appears more strongly associated with outcomes.

- PMSU has consistently been linked with sleep issues[7], loneliness[8], and depression, anxiety, and stress[9].
- A high-quality 2025 study shows that high or increasing trajectories of addictive social media use, mobile phone use, or video games are common in early adolescents and are associated with suicidal behaviours and ideation and worse mental health[10].

---

[1] 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; **3**(3): e0001091.

[2] Blanchard L, Conway-Moore K, Aguiar A, et al. Associations between social media, adolescent mental health, and diet: A systematic review. *Obesity reviews* 2023; **24**: e13631.

[3] 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; **3**(3): e0001091.

[4] Sharma A, Vidal C. A scoping literature review of the associations between highly visual social media use and eating disorders and disordered eating: a changing landscape. *Journal of Eating Disorders* 2023; **11**(1): 170.

[5] Webster D, Dunne L, Hunter R. Association between social networks and subjective well-being in adolescents: A systematic review. *Youth & Society* 2021; **53**(2): 175-210.

[6] Saiphoo AN, Halevi LD, Vahedi Z. Social networking site use and self-esteem: A meta-analytic review. *Personality and Individual Differences* 2020; **153**: 109639.

[7] Khan A, Thomas G, Karatela S, Morawska A, Werner-Seidler A. Intense and problematic social media use and sleep difficulties of adolescents in 40 countries. *Journal of Adolescence* 2024; **96**(5): 1116-25.

[8] Ge M-W, Hu F-H, Jia Y-J, et al. The relationship between loneliness and internet or smartphone addiction among adolescents: A systematic review and meta-analysis. *Psychological Reports* 2025; **128**(3): 1429-51.

[9] Shannon H, Bush K, Villeneuve PJ, Hellemans KG, Guimond S. Problematic social media use in adolescents and young adults: systematic review and meta-analysis. *JMIR mental health* 2022; **9**(4): e33450.

[10] Xiao Y, Meng Y, Brown TT, Keyes KM, Mann JJ. Addictive screen use trajectories and suicidal behaviors, suicidal ideation, and mental health in US youths. *JAMA* 2025.

- This is important to the NZ context, where 1 in 5 children aged 13-18 meet the PSMU criteria.

Experimental studies linking social media with harm

A recent meta-analysis investigated whether reducing exposure to smartphones or social media would improve mental health outcomes, with mixed results[1]. However:

- This meta-analysis included studies where participants reduced or withdrew use for as little as one day. Studies with short durations like this are likely picking up on withdrawal symptoms, and this is reflected in the findings, where short-term withdrawal of use had negative impacts on wellbeing outcomes.
- When the data were reanalysed to only include studies with durations of more than 1 week, the opposite was found, with almost all studies showing positive impacts on wellbeing outcomes[2].

Other emerging evidence inferring causation

In addition to the studies above, emerging evidence from studies published in 2025 suggests that social media may be causally linked with harm:

- A 3-week smartphone screen use reduction study demonstrated small to medium effect sizes on depressive symptoms, stress, sleep quality, and wellbeing[3].
    - The authors concluded, "The results suggest a **causal** relationship, rather than a merely correlative one, between daily smartphone screen time and mental health."
- A 3-year longitudinal study investigated the relationship between social media use and depressive symptoms across 4 annual waves from late childhood to early adolescence[4].
    - Longitudinal associations were identified between increases in social media use and later depressive symptoms at the within-person level.
    - The authors concluded, "These findings provide initial evidence of temporal ordering and could suggest that social media use is a potential contributing factor to adolescent depressive symptoms **rather than merely a correlate** or consequence of such symptoms."

[1] Ferguson CJ. Do Social Media Experiments Prove a Link With Mental Health: A Methodological and Meta-Analytic Review. 2024.

[2] Rausch Z, Haidt J, "The Fundamental Flaws of the Only Meta-Analysis of Social Media Reduction Experiments (and Why It Matters), Part 1," 2025, https://www.afterbabel.com/p/the-case-for-causality-part-1.

[3] Pieh C, Humer E, Hoenigl A, et al. Smartphone screen time reduction improves mental health: a randomized controlled trial. *BMC medicine* 2025; **23**(1): 107.

[4] Nagata JM, Otmar CD, Shim J, et al. Social media use and depressive symptoms during early adolescence. *JAMA Network Open* 2025; **8**(5): e2511704-e.

Small effect sizes

- Although effect sizes may seem small to clinicians, they can have profound effects if they occur at the population level[1].
- Small effects can have substantial consequences, especially when considered at scale and over time[2].
- Social media use in NZ adolescents is near universal, estimated at around 90%; therefore, even small effect sizes are likely to have a large impact.
- Importantly, "complex psychological phenomena are most likely determined by a multitude of causes and that any individual cause is likely to have only a small effect"[3].

Potential benefits of social media

Social media as a source of mental health support

- In the U.S., 34% of teens say they use social media as a mental health resource[4].
- Social media may be a gateway to credible mental health support; however, teens rarely find evidence-based content there.
    - A recent study found that only one of the top 100 TikTok videos tagged with #teenmentalhealth contained reliable, evidence-based treatment content[5].
- In young people who had experienced self-harm, social media was described as an unsafe environment where self-harm is normalised and glamorised, graphic content is shared, and harmful content appears in feeds through algorithms, even when the young person wasn't seeking it out[6].

Social media is a place for minority groups to connect and develop identity

- Social media plays an important role in the daily lives of LGBTQ+ youth and can offer a safe space not offered in offline environments[7][8].
- It offers a place for information, identity formation and exploration, and support[9][10].
- Social media has also been described as a double-edged sword for LGBTQ+ youth:

[1] Carey EG, Ridler I, Ford TJ, Stringaris A. Editorial Perspective: When is a 'small effect' actually large and impactful? *Journal of child psychology and psychiatry* 2023; **64**(11): 1643-7.

[2] Götz FM, Gosling SD, Rentfrow PJ. Small effects: The indispensable foundation for a cumulative psychological science. *Perspectives on psychological science* 2022; **17**(1): 205-15.

[3] Götz, 2022

[4] Pew Research Center. Teens, Social Media and Mental Health, 2025.

[5] Lau N, Srinakarin K, Aalfs H, Zhao X, Palermo TM. TikTok and teen mental health: an analysis of user-generated content and engagement. *Journal of pediatric psychology* 2024: jsae039.

[6] Lookingbill V, Le K. "There's Always a Way to Get Around the Guidelines": Nonsuicidal Self-Injury and Content Moderation on TikTok. *Social Media+ Society* 2024; **10**(2): 20563051241254371.

[7] Selkie E, Adkins V, Masters E, Bajpai A, Shumer D. Transgender adolescents' uses of social media for social support. *Journal of Adolescent Health* 2020; **66**(3): 275-80.

[8] Paceley MS, Goffnett J, Sanders L, Gadd-Nelson J. "Sometimes you get married on Facebook": The use of social media among nonmetropolitan sexual and gender minority youth. *Journal of Homosexuality* 2022; **69**(1): 41-60.

[9] Byron P, Robards B, Hanckel B, Vivienne S, Churchill B. " Hey, I'm having these experiences": Tumblr use and young people's queer (dis) connections. *International Journal of Communication* 2019; **13**: 2239-59.

[10] Berger MN, Taba M, Marino JL, Lim MS, Skinner SR. Social media use and health and well-being of lesbian, gay, bisexual, transgender, and queer youth: Systematic review. *J Med Internet Res* 2022; **24**(9): e38449.

- LGBTQ+ youth are more likely to be exposed to self-harm[1].
- Social media has been described as intense and toxic by LGBTQ+ youth[2].
- Mental health concerns are linked with discrimination, victimisation, and policies that do not accommodate changed identities[3].
- One study identified three narratives in LGBTQ+ youth, with the dominant narrative being that social media is a place of rejection (43.1%), followed by a place of connection (37.9%), and a duality of experiences (19.0%)[4].

Social media is a place for connection, identity formation, learning, and emotions

- A recent systematic review and thematic meta-analysis of adolescent views of social media use and wellbeing consistently found a duality of outcomes (**Figure 1**)[5].
  - Connections: While social media can be used for social support, it can also be a source of conflict and criticism
  - Identity: Social media can help construct identities, but at the same time, can lead to inauthentic self-expression
  - Learning: While social media can be a source of knowledge, it can also displace and interrupt learning opportunities and be a source of inaccurate information or even misinformation.
  - Emotions: Social media can have both a positive and a negative impact on mood.

Note: It is vital to provide vulnerable youth with safe, regulated online spaces to connect with communities they identify with and offer the support they may have found on social media, whilst protecting them from its associated harms [See Recommendation 3].

Pathways through which social media harms

Pathways to harm
Design features
o Algorithms
o Persuasive design
o Short-form videos
Fear of missing out
Social comparisons
Cyberbullying
Harmful content
Sextortion and predators
Social exclusion
Pornography
Child sexual exploitation
Polarisation and exposure to echo chambers

[1] Charmaraman L, Hodes R, Richer AM. Young sexual minority adolescent experiences of self-expression and isolation on social media: cross-sectional survey study. *JMIR mental health* 2021; **8**(9): e26207.

[2] Byron, 2019.

[3] Berger, 2022.

[4] Fisher CB, Tao X, Ford M. Social media: A double-edged sword for LGBTQ+ youth. *Computers in Human Behavior* 2024; **156**: 108194.

[5] Shankleman M, Hammond L, Jones FW. Adolescent social media use and well-being: A systematic review and thematic meta-synthesis. *Adolescent Research Review* 2021; **6**(4): 471-92.

To effectively reduce the negative impacts of social media on young people, any legitimate and meaningful intervention must address all the pathways through which social media leads to harm, not just the easiest or most convenient to tackle, such as design features or harmful content.

The teenage brain

- Neuroscience research reveals that adolescence is a period of heightened sensitivity to the influence of social media, making young people especially susceptible to its harms.
- Those under 16 are at greatest risk, underscoring the urgent need for stronger protections during these critical years of development[1].

RECOMMENDATIONS

While social media is only one factor affecting youth mental health and wellbeing, it stands out as a highly modifiable risk, offering a powerful opportunity for meaningful change.

Te Tiriti o Waitangi

To commit to achieving equitable outcomes for Māori, we must recognise and actively address the disproportionate harms that they face online. This will include targeted research, policy, and resourcing to close the digital harm and wellbeing outcomes gap.

Proactive steps must be taken to safeguard rangatahi Māori from social media harms. This requires the Crown and health agencies to be fully informed about the specific risks and impacts for Māori, and to act decisively to prevent harm, such as supporting culturally relevant digital literacy programs and regulating harmful platform designs. Research into how rangatahi Māori use and engage with social media platforms should be prioritised, and adequate funding of kaupapa Māori approaches to digital wellbeing secured, to ensure rangatahi Māori and whānau have access to culturally safe online spaces and support services that reflect te ao Māori values and models of care.

---

[1] Orben A, Przybylski AK, Blakemore S-J, Kievit RA. Windows of developmental sensitivity to social media. *Nature Communications* 2022; **13**(1): 1649.

Recommendations include:

- Establishing Māori-led advisory groups on digital harm.
- Co-creating digital wellbeing resources with Māori youth.
- Investing in kaupapa Māori online community and health support platforms.
- Ensuring all public health messaging and interventions are culturally responsive and accessible to Māori.

The Ottawa Charter

The following recommendations are based on the five action areas of the Ottawa Charter for health promotion. The Charter provides clear action areas, such as building healthy public policy, creating supportive environments, strengthening community action, developing personal skills, and reorienting health services, that guide comprehensive, effective interventions. Importantly, the Charter encourages collaboration across sectors and settings, ensuring that solutions address the root causes of health issues and promote equity.

Recommendation 1: Raise and Enforce the Minimum Age for Social Media Access to 16

Ottawa Charter Action Area: Build Healthy Public Policy

Age restrictions are the only comprehensive strategy that addresses all the ways social media can cause harm. This includes social comparison, exclusion, echo chambers, fear of missing out, and the effects on brain development and the brain's reward system.

Although age restrictions won't be completely foolproof, they are crucial to the solution. This approach is not just about limiting children's access or holding social media companies accountable; it is also about changing societal expectations and giving parents the confidence to set boundaries and say 'no'.

We do not have research demonstrating this approach is effective, because this policy has not been implemented yet, and other jurisdictions are also just coming to terms with the harm and exploring regulatory tools to protect young people. However, research in adults shows that even reducing social media use for a week or more has a positive impact on mental wellbeing. Given the scale of social media use and harm, a policy will likely represent a cost-effective approach in NZ.

Considerations

Safety by design would be a better approach to a ban

While working with tech companies to promote 'Safety by Design' is recommended as a general goal for adults, as certain features of social media are harmful to all age groups, there are significant issues with relying on this approach for social media, particularly when it comes to young people:

- Safety by Design Guidelines for children[1] do nothing to protect children from social comparisons, distractions, social exclusion, echo chambers, short-form videos, or the impacts of social media on the brain's reward system.
- Filters are not 100% effective.
  An internal TikTok study found that:

  The "leakage rate" [inappropriate content getting past moderators] is as follows: 35.71% of "Normalisation of Pedophilia" content; 33.33% of "Minor Sexual Solicitation" content; 39.13% of "Minor Physical Abuse" content; 30.36% of "leading minors off platform"; 50% of "Glorification of Minor Sexual Assault"; and 100% of "Fetishizing Minors."[2]

- Content is not always overtly harmful, e.g. a video of a man squeezing a water bottle to demonstrate how hard to choke a woman or girls talking about how many calories they have eaten, etc. This content is unlikely to be filtered but is still harmful.
- Even if social media is deemed 'safe' concerning harmful content and exposure to predators and ads, it still displaces time in activities known to be supportive for wellbeing and development, such as sleep, physical activity, and face-to-face

---

[1] OECD Publishing. Towards digital safety by design for children, 2024.
[2] Kentucky attorney general, 12 states sue TikTok. 2024.

communication. While some academics refute this argument, internal documents from TikTok show that they are aware of this harm:

"Compulsive usage also interferes with essential personal responsibilities like sufficient sleep, work/school responsibilities, and connecting with loved ones."[1]

- There will be little incentive for tech companies to remove features such as persuasive design (e.g. notifications, streaks) and short-form videos, as these features are the equivalent of 'nicotine' in vapes and cigarettes. Their business model is user engagement and 'eyes on screens'.

"The product in itself has baked into it compulsive use."[2]

- Tech companies do not have a history of acting in good faith concerning how they design their products for children. For example, internal documents from TikTok reveal that they introduce features designed to look like they are encouraging healthier or safer use of their products. Still, they are aware that while these features look good to policymakers, they are not effective:

"We found out through some research that they're not altogether effective", but that "it's good as a point to share with policymakers, 'cause they're kind of impressed that we're spending time, money, and energy to get people off our platform, at least in theory."[3]

There will be unintended consequences

It is argued that because under 16s are not meant to be on social media, they will not be able to ask for help if they are on it and get into trouble. From personal communications with families and children in my work, children report not telling their parents about things they have encountered online, as they know their parents will take the device away. Importantly, an enforced age restriction does not hold children or parents responsible, but rather the companies profiting from that harm.

The concern that raising the age for social media access might discourage open conversations about harmful online experiences between young people and their parents is not a valid reason to continue exposing adolescents to such risks.

Freedom of speech violations

Some argue that imposing an age restriction on social media would violate freedom of speech, but societies already accept reasonable limits on free expression to protect against harms like invasion of privacy or defamation. Safeguarding children from online harm is a similarly legitimate reason for placing restrictions. Moreover, the persuasive design and algorithm-driven content of social media platforms undermine true free will by manipulating what children see and how they behave online, meaning their freedom of expression is already compromised. Allowing access to social media exposes children to manipulation, abuse, and exploitation, so protecting them should take priority.

---

[1] Haidt J RZ. TikTok Is Harming Children at an Industrial Scale. 2025.
[2] Haidt, 2025.
[3] Haidt J RZ. TikTok Is Harming Children at an Industrial Scale. 2025.

It's delaying the inevitable

Delaying access buys time for vital brain development to occur. It also enables structured educational programmes to be embedded into the school curriculum or provided through external agencies. Without enforced age restrictions, young kids will continue to access social media without the opportunity for education.

Kids will be forced onto platforms with even darker content

From my work in schools, I have spoken to many children and adults who have talked to me about the content they/their kids have seen on social media. This has ranged from violent pornography, live beheadings/murders, raping of infants, and putting kittens in blenders. The content our kids see on social media could not get much darker.

Social media is harmful, but you cannot stop children from using it

Just like other age restrictions, such as those for smoking, driving, and having sex, we do not expect an age restriction to be 100% effective. However, it is a crucial first step in shifting societal norms and empowering parents to say no. As a society, we should also not just continue to give children access to a harmful product just because it is hard to regulate – this sets a dangerous precedent.

Kids go to social media for mental health support

Research shows that social media does not provide evidence-based support for mental health issues, and this is not the content that most young people are engaging with when they access 'mental health support' on social media. Research from Youthline also shows that this is not the preferred place to get support, with kids ranking it 11th on the list of places that are best to get support[1]. Any benefits of reaching kids on social media to provide mental health support can be realised by moving kids onto more regulated platforms for support [see Recommendation 3 and Recommendation 4].

Social media is an important place to connect, particularly for minority groups

The research presented previously showed that minority groups are also more likely to be harmed by social media and that excessive social media can increase loneliness. Increasing the age of access to social media is not about restricting all internet use and opportunities for connection, just the ones on a platform associated with significant harm. There is, therefore, an opportunity to move kids onto more regulated platforms where they can connect.

---

[1] Youthline. State of the Generation Report 2023, 2023.

Recommendation 2: Develop a public health campaign that aligns with teen values

Ottawa Charter Action Area: Strengthening community action

Introduction of an age restriction is likely to result in a backfire effect, whereby teens are more likely to want to use social media if we take it away from them. This is because when we perceive our sense of freedom to engage in an activity is being threatened, even if we agree that the activity is not good for us, psychological reactance can make us want to engage in that behaviour even more. When designing messages for teens, we need to avoid activating their psychological reactance. To do this, we must steer clear of explicit directives.

The anti-tobacco Truth campaign provides a framework for doing this. Between 2000 and 2004, it's estimated that the Truth campaign prevented around 450,000 adolescents from trying smoking in the United States, because it did not threaten the freedom of teens; instead, it invited them to reclaim it. Quitting smoking was framed as an act of independence.

A campaign for teens around social media use could do the same by highlighting how platforms exploit users, and frame opting out or using alternatives as an act of autonomy.

Such a campaign might expose the manipulation techniques used by tech companies to hook young users, centre the youth voice by having teens share their experiences of social media harms, invite teens to be counterculture, and offer young people safer and healthier alternatives that they can co-create, such as online and offline spaces that prioritise safety, privacy, and connection. Spaces are shaped by teens and are not engineered for corporate profit.

Considerations

There is a growing movement in NZ to prioritise youth voices in shaping social media policy. While listening to young people and valuing their perspectives is essential, it's equally important to recognise that young people are not experts in the research. They may not fully understand the sophisticated manipulation tactics social media companies use to capture their attention or how these platforms can affect their brain development. Ultimately, personal experience, while valuable, does not equate to expertise. Policy must balance youth input with evidence-based knowledge to protect and support young people.

Rather than simply asking teens what they want, I propose that we trust them with the truth, equip them with knowledge about how these platforms operate, and invite them to be active partners in creating solutions (within the parameters of an age restriction of 16 years).

Tackling social media harms will require bold, honest campaigns that respect young people, expose the realities behind the platforms, and empower healthier choices.

Recommendation 3: Create supportive and regulated online and offline environments

Ottawa Charter Action Area: Creating supportive environments

The environments where children spend their time, both physical and online, are critical to their wellbeing. Many NZ schools have already adopted smartphone-free policies, but it is essential to ensure full compliance with this legislation to help shift social norms and foster healthier habits. Further, schools should refrain from using social media to communicate with children.

Expanding social-media-free zones, like smokefree areas, would further promote healthy environments for children. Schools should also reconsider the necessity of device-based homework, recognising their pivotal role in shaping digital habits despite competing demands.

It is important that we pair policy changes with offline and online spaces and resources for vulnerable youth. In particular, vulnerable youth will need regulated online spaces to connect with communities they identify with and offer the support they may have found on social media, without exposing them to its associated harms.

Considerations

A common argument against imposing a social media age restriction is that it could cut off essential sources of support for vulnerable children, especially those from minority groups. While social media can offer connection and community, these same young people are also disproportionately exposed to harmful content that undermines their wellbeing. One solution is to create or promote regulated online spaces where young people can safely connect and access support, without the risks that come with mainstream social media platforms.

Recommendation 4: Invest in safe and regulated access to mental health support

Ottawa Charter Action Area: Reorienting health services

Health providers need targeted support to recognise social media as a significant environmental factor affecting youth mental health. They should be equipped with practical resources and training to help whānau and children navigate these risks.

Comprehensive mental health support for teens is also essential. This includes accessible online support through regulated platforms and increased investment in in-person mental health services.

Considerations

Some argue that removing social media would leave vulnerable teens without access to mental health support. However, social media is often not a safe environment for these young people and rarely provides evidence-based support. Organisations that offer safe, effective help may

need to transition their services to regulated platforms or find new ways to reach youth who are no longer on social media. While social media is sometimes seen as a lifeline for mental health support and a space for marginalised communities to connect, to truly support young people, we must ensure they have access to both online support on regulated platforms and robust offline services.

Recommendation 5: Provide information and education for whānau and young people

Ottawa Charter Action Area: Developing personal skills

Parent education is a key part of the solution. Research has shown better mental health outcomes for children whose parents report greater control over their time spent online; however, many NZ parents are unaware of the risks their children face on social media or how to support them.

Education for young people before they reach 16 years is also key. This should be embedded into the school curriculum and introduced cumulatively through classroom education in the early years.

Considerations

While parent education is important, relying solely on parents to be vigilant is simply not feasible, with many lacking the tools and resources to monitor their children's social media access. For solutions to be equitable, they must extend beyond parental responsibility.

Similarly, while building digital literacy skills is essential, it should not be the primary approach to keeping children safe on social media. As this submission demonstrates, young adolescents are especially vulnerable to social media platforms' persuasive techniques to capture and hold their attention.

Even tech companies acknowledge that young people cannot fully self-regulate, yet they (and other groups) continue to promote education as the primary safeguard, a stance revealed in internal documents from TikTok[1]:

Minors are "particularly sensitive to reinforcement in the form of social award," have "minimal ability to self-regulate effectively," and "do not have executive function to control their screen time."

"TikTok's success can largely be attributed to strong out-of-the-box personalisation and automation, which limits user agency."

The reality is that education alone, no matter how high its quality, is unlikely to meaningfully reduce social media harms. Young brains are simply not equipped to resist these platforms' sophisticated, reward-based designs. This narrative, promoted by industry, is not supported by research.

---

[11] Haidt J RZ. TikTok Is Harming Children at an Industrial Scale. 2025.

Other recommendations for consideration

- **Conflict of interest disclosure:** Anyone publicly commenting on the harms or benefits of social media for youth mental health, whether in the press, Parliament, or elsewhere, must be required to disclose any conflicts of interest, and I would encourage the Committee to require that submitters disclose conflicts including donations, grants and any other funding from tech companies.

- **Prioritise restrictions on account creation:** Legislation should focus on restricting minors' creation of social media accounts, rather than simply limiting access to certain content.

- **Regulate harmful design features**: Introduce policies that protect children from harmful design elements. While social media is particularly damaging to young people, other online platforms also use persuasive design, AI-driven recommendations, and gamification to capture attention. Minimum safety standards should be established for all digital spaces to guard against harmful content, inappropriate contact, excessive use, and misuse of personal data.

- **Limit engagement with tech companies:** Be cautious when involving tech companies in policy discussions. These companies have shown they do not always act in good faith. For instance, they have made billions from products designed to be addictive, products they know can harm young people, while publicly downplaying these risks. They also undertake corporate blame shifting, where they divert the responsibility off the companies (who are profiting) and onto the users (children), and then frame this as "empowering" young people. Additionally, much like tobacco companies in the past, tech firms try to enhance their credibility by funding organisations tasked with keeping kids safe online and youth organisations in NZ.

- **Avoid relying on parental consent to apps:** Do not make parental consent the primary safeguard for social media or app use. Many parents may not fully understand the risks, and this approach quickly becomes ineffective as social pressure mounts for parents to allow access. We see this with Meta supporting a "Digital Age of Majority" (where parental consent will be required to access social media). While this has been framed as supporting and empowering parents, ultimately it will lead to the same situation we find ourselves in, where parents are pestered to allow access to smartphones and social media because "everyone else has it". All this succeeds in doing is putting the onus of responsibility back on the parents.

- **Invest in research on AI-driven risks:** AI is rapidly reshaping online environments, with significant implications for wellbeing, education, and relationships. Proactive investment is needed to monitor, understand, and address these emerging risks.

Conclusions

The recommendations outlined here are not about excluding young people from social media but about delaying access, just as we do with driving, smoking, and drinking, until they are developmentally ready to choose for themselves whether or not they want to take on the risks and responsibilities involved.

A genuine public health strategy must move beyond simply targeting individuals and their parents. Current recommendations place too much emphasis on education, framing social media use as a personal choice and shifting responsibility away from tech companies and onto families. Given the intentionally addictive nature of these platforms and the unique vulnerabilities of the adolescent brain, the responsibility for harm lies squarely with the companies that design and profit from these systems, not with the young people who use them.

Just because social media has become the norm in young people's lives does not mean it is healthy or inevitable. While we want youth to eventually learn to use social media safely and responsibly, expecting children to master these skills when even adults struggle is unrealistic and unfair. Our primary duty must be to protect young people, not to maintain the status quo for industry benefit.