

From: eSafety Commissioner
Sent: Thursday, 4 September 2025 1:48 PM
To: **s 22**@valvesoftware.com
Cc: eSafety Industry Supervision; Social Media Minimum Age Restrictions; **s 47G** @valvesoftware.com
Subject: Amended: CC25-0110_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]
Attachments: CC25-0110_Correspondence from eSafety Commissioner to Steam regarding SMMA obligations .pdf

OFFICIAL

Dear **47F**

Many apologies, we understand the link to [How to assess if a service is an age-restricted social media platform | eSafety Commissioner](#) was broken. We have now corrected the link within the attached letter.

Please find re-attached correspondence from the eSafety Commissioner, Julie Inman Grant, providing update on the social media minimum age (SMMA) obligations.

Many thanks

Kind regards

s 47E(c), s 47F

Executive Officer
Office of the eSafety Commissioner

 esafety.gov.au

 **s 22**



eSafety acknowledges all First Nations people for their continuing care of everything Country encompasses — land, waters and community. We pay our respects to First Nations people, and to Elders past and present.

4 September 2025

CC25-0110

47F

Legal Counsel

Valve

By email: 22 @valvesoftware.com
Cc: s 47G @valvesoftware.com

Dear 47F

Social media minimum age obligation

I am writing to provide you with an update on the social media minimum age (**SMMA**) obligations, specifically our next steps in determining whether individual services will be subject to the SMMA obligations and our development of regulatory guidance.

Background

An age-restricted social media platform is defined in section 63C(1)(a) of the *Online Safety Act 2021* (**the Act**) as an electronic service with the sole purpose, or a significant purpose, of enabling online social interaction between 2 or more end-users, which allows end-users to link to, or interact with, some or all of the other end-users, and which allows end-users to post material on the service. Section 63C(6) provides that an electronic service is not an age-restricted social media platform if the service is specified in the legislative rules.

On 29 July 2025, the Minister for Communications, the Honourable Anika Wells MP, made the *Online Safety (Age Restricted Social Media Platforms) Rules 2025*¹ (**the Rules**) under the Act, specifying certain classes of services that are not age-restricted social media platforms.

Where a service demonstrates that it falls within a class of service specified in the Rules, it will not be subject to the SMMA obligation set out in section 63D of the Act. The Explanatory Statement to the Rules states the intention of the Rules is to focus the SMMA obligation on platforms with features and functions known to be harmful to children, whilst excluding those services that pose fewer harms to children, and which help children and young people to thrive.

¹ See the Federal Register of Legislation in relation to the Rules - [Online Safety \(Age-Restricted Social Media Platforms\) Rules 2025 - Federal Register of Legislation](#), and the Explanatory Statement to the Rules - [Online Safety \(Age-Restricted Social Media Platforms\) Rules 2025 - Federal Register of Legislation](#).

Assessment of specific services

eSafety is considering whether certain services may be age-restricted social media platforms and whether some of these services may be excluded under the Rules.

To assist services, eSafety has published guidance on how to assess whether a service is an age-restricted social media platform: [eSafety.gov.au/social-media-age-restrictions-assessment](https://esafety.gov.au/social-media-age-restrictions-assessment).

We are encouraging Valve and other providers of online services to use this guidance to self-assess whether or not they meet the definition of an age-restricted social media platform as soon as possible, and to advise eSafety of their assessment in advance of the SMMA obligations taking effect on 10 December 2025.

We will be using this guidance to undertake our own preliminary assessment of Steam game library and Steam Chat and whether either service is an age-restricted social media platform. If you consider that Valve has additional information that may inform eSafety's assessment, having regard to the guidance, we encourage you to send that to us as soon as possible.

Regulatory guidance for age-restricted social media platforms

eSafety has been engaging in broad consultation to support the development of regulatory guidance in relation to the SMMA obligation.

We understand from discussions with industry the preference for early guidance to assist platforms with their preparation for the commencement of the SMMA obligation. eSafety's regulatory guidance will have regard to knowledge and practice from our previous work on age assurance, results from the government's technical trial, feedback from the consultation and comparable international frameworks.

The guidance will include principles intended to facilitate positive outcomes for Australian end-users as well as support platforms to achieve the intention of the SMMA obligation. These will include and have regard to the principles raised consistently in consultations:

- Age assurance measures, whether deployed in a standalone manner or as part of a multi-layered approach, should be accurate, effective and robust
- Age assurance measures should be privacy-preserving and adopt a data minimisation approach

- Age assurance measures should respect and promote human rights and minimise the potential for bias and discrimination
- Services should be clear and transparent about the age assurance measures they implement by clearly informing users about their options to confirm their age, what data will be used, how data is stored and protected and what the user's rights are in the process.

We recognise platforms vary in design, risk profile, and user base. What is reasonable on one service may not be reasonable on another and may also evolve over time. The regulatory guidance will set out parameters in relation to reasonable steps and will not be prescriptive (for example, the guidance will not state that a certain class or type of tool must be used).

Consistent with the SMMA obligation, platforms are responsible for determining appropriate technical specifications in relation to the use of tools or technology to assess the age of Australian end-users and prevent the creation and holding of accounts by Australian children under the age of 16. Decisions around which tools or technologies to implement should be guided by the principles in the regulatory guidance, which we have foreshadowed at a general level above, as well as informative sources like the government's age assurance technology trial report,² a platform's own testing/innovation and emerging international standards.

eSafety's expectations for age-restricted social media platforms

eSafety will provide further guidance to industry in the coming weeks, however we wish to make clear our expectations for what age-restricted social media platforms should be doing **now** in preparation for the SMMA obligation taking effect on 10 December. eSafety will form a preliminary view in the coming weeks as to whether Steam game library or Steam Chat is captured, and in the interim we are sharing these expectations to assist Steam with any preparation that it may need to undertake should it assess or be assessed as an age-restricted social media platform.

Importantly, and consistent with prior messaging,³ eSafety expects services to prioritise:

- Preparing to find and deactivate accounts held by Australian end-users under 16 from 10 December. This includes end-users with a self-declared age of under 16 as well as any end-users determined to be under 16 through a service's systems and processes.

² [Home - Age Assurance Technology Trial](#)

³ See the eSafety Commissioner's speech at the National Press Club in Canberra on 24 June 2025: [Swimming between the digital flags: helping young Australians navigate social media's dangerous currents](#) | eSafety Commissioner.

- Providing early, clear and age-appropriate communications to affected end-users including:
 - how they can download or otherwise preserve/access their account information while they are unable to use an account to access an age-restricted social media platform
 - what will happen to their account information when their account is deactivated
 - how and when they can expect or request their account be reinstated, including how to appeal if they believe their account was deactivated in error, and
 - support information and resources, noting that some end-users may feel distressed or confused.
- Taking reasonable steps to prevent current Australian end-users under 16 with accounts from increasing their declared age to over 16, opening new accounts indicating that they are over 16, or seeking to change their location or other settings in an effort to open or retain an active account on an age-restricted social media platform.
 - Examples of steps taken by some social media services are set out in eSafety's transparency report titled '[Behind the Screen](#)', published in February 2025.
- Ensuring that the mechanisms for reporting a potential underage end-user and assessing those reports are accessible, fair, transparent, timely and empower end-users/reporters with the option to appeal or challenge an outcome, and that services are prepared to manage potential increase in volume of reports from 10 December.
- Scoping effective age assurance measures to be applied at the point of account creation and across the user-journey. Self-declaration, on its own, will not be sufficient. Services should give consideration to:
 - the overview of the principles eSafety has outlined above
 - building on the systems and processes already in place to enforce current minimum age rules
 - how fallback mechanisms might be triggered for borderline cases

- circumvention risks, including location-based circumvention such as VPN use or age-based circumvention such as spoofing techniques, and appropriate safeguards to combat these risks.

Services are encouraged to document decision-making, risk and impact assessments and other key information related to the implementation of age assurance measures that may demonstrate the taking of reasonable steps.

eSafety has also published some [FAQs](#) on the eSafety website which may assist in developing plans and communications to support and inform end-users' understanding of the SMMA obligations.⁴

The above points are intended to provide you with an early, interim indication of our approach and position. More detailed guidance will be provided shortly.

In the meantime, please reach out if you have any questions about the steps outlined above.

The privacy regulator, the Office of the Australian Information Commissioner (**OAIC**), is a co-regulator of the SMMA legislative requirements and we will continue to work closely with the OAIC as we progress with preparation for implementation of the SMMA obligation.

Next steps

We would appreciate your response to this letter, and in particular, any information you consider relevant to an assessment of whether Steam is an age-restricted social media platform or whether it is excluded under the Rules, by 18 September 2025.

Please do not hesitate to contact my team at **47E(d) [@esafety.gov.au](#)** to discuss.

Yours faithfully



Julie Inman Grant
eSafety Commissioner

⁴ eSafety website, [Social media 'ban' or delay FAQ | eSafety Commissioner](#).

From: **s 47F** **s 22** @valvesoftware.com>
Sent: Tuesday, 23 September 2025 11:25 AM
To: eSafety Commissioner; **s 47F**
Cc: IndustryBOSE; Social Media Minimum Age Restrictions; **s 47G**
Subject: RE: [External Mail] CC25-0110_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]
Attachments: Reply letter to eSafety Commissioner September 2025.pdf

You don't often get email from **s 22** @valvesoftware.com. [Learn why this is important](#)
Hello **s 47E(c), s 47F**

s 47F is travelling and asked me to get back to you.

Valve's response is attached. As noted in the response, feel free to reach out with any questions or if you'd like to discuss.

Thank you.

s 47F
Deputy General Counsel
Valve Corporation

From: eSafety Commissioner **s 47E(d)** @eSafety.gov.au>
Sent: Wednesday, September 3, 2025 7:06 PM
To: **s 47F** **s 22** @valvesoftware.com>
Cc: IndustryBOSE **s 47E(d)** @eSafety.gov.au>; Social Media Minimum Age Restrictions
s 47E(d) @esafety.gov.au>; **s 47F** @valvesoftware.com>
Subject: [External Mail] CC25-0110_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]

OFFICIAL

Dear **s 47F**

Please find attached correspondence from the eSafety Commissioner, Julie Inman Grant, providing update on the social media minimum age (SMMA) obligations.

Many thanks

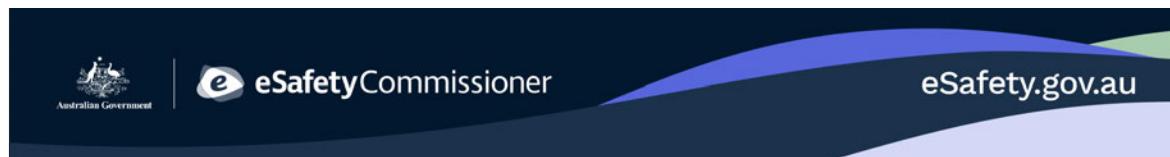
Kind regards

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Valve Corporation
10400 NE 4th Street, Suite 1400
Bellevue, WA 98004

valvesoftware.com

s 22

September 22, 2025

Julie Inman Grant
eSafety Commissioner

via email to **s 47E(d)** @eSafety.gov.au, **s 47E(d)** @eSafety.gov.au, and
s 47E(d) @esafety.gov.au

Dear Commissioner Grant:

I write on behalf of Valve Corporation in response to your letter to **s 47F** dated September 4, 2025, regarding whether Valve's gaming service, Steam, is an age-restricted social media platform as defined in section 63C(1)(a) of the *Online Safety Act 2021* (the "Act"). **s 47F**

The Rules¹ identify several types of services that are "not age-restricted social media platforms" under the Act, including "services that have the sole or primary purpose of enabling end-users to play online games with other end-users" and "services that have the sole or primary purpose of enabling end-users to share information (such as reviews, technical support or advice) about products or services."

Steam is an online gaming platform—the core experience for Steam users is browsing for, purchasing, and playing games. You can access Steam at <https://store.steampowered.com/>.

Steam does offer some limited community features (called "Steam Community") that are ancillary to users' gaming experiences. You can access Steam Community by clicking the "COMMUNITY" link at the top of the Steam homepage, or by navigating directly to <https://steamcommunity.com/>. Steam users use Steam Community to share information about the games on Steam through features like discussion boards, player profiles, game guides, and game reviews. Like all of Steam, Steam Community is focused on games—posting off-topic content is against the rules. See <https://help.steampowered.com/en/faqs/view/6862-8119-C23E-EA7B>. Steam Community is not monetized at all; Valve does not sell advertising or Steam user data.

In short, Steam's primary purpose is "enabling end-users to play online games with other end-users." Steam Community is ancillary to Steam and exists to support Steam's primary purpose by enabling Steam users to "share information (such as reviews, technical support or advice) about" the games on Steam. Accordingly, Steam is not "an age-restricted social media platform" under the Act.

¹ The "Rules" were defined in your letter as the *Online Safety (Age Restricted Social Media Platforms) Rules 2025* promulgated under the Act on 29 July 2025 by the Minister for Communications, the Honourable Anika Wells MP. The Rules are available online at <https://www.legislation.gov.au/F2025L00889/latest/text>.

If you or your staff would like to discuss, please contact me via email at s 22@valvesoftware.com.

Sincerely,

S 47F

Deputy General Counsel
Valve Corporation