



29 August 2025

Julie Inman Grant
eSafety Commissioner
Office of the Australian eSafety Commissioner
Level 5, 65 Pirrama Road
Pyrmont NSW 2009

By email: s 47E(d) [redacted] [@eSafety.gov.au](mailto:[redacted]@eSafety.gov.au)
Copy: s 47E(d) [@eSafety.gov.au](mailto:[redacted]@eSafety.gov.au) s 47E(d) [redacted] [@esafety.gov.au](mailto:[redacted]@esafety.gov.au)

Dear Commissioner

CONFIDENTIAL: NOT FOR PUBLIC DISCLOSURE

s 47G(1)(b) [redacted]

I refer to your letter dated s 47G(1)(b) [redacted] issued to Meta Platforms, Inc. (Meta) in which you requested:

s 47G(1)(b) [redacted]

We have responded to each of these requests below.

Facebook and Instagram

s 47G(1)(b) [redacted]

WhatsApp

The primary purpose of WhatsApp is to enable end-users to communicate privately by means of messaging, voice calling or video calling. s 47G(1)(b) [redacted]

s 47G(1)(b)

s 47G(1)(b)

. In Minister Rowland's Second Reading Speech,¹ the Minister noted that the objective of the SMMA obligation is to protect, rather than isolate, young people, and that including messaging apps within the definition of 'age-restricted social media platform' would make it harder for young people to communicate with their families. The Minister explicitly identified WhatsApp as an example of a messaging service that was expected to be deemed out of scope of the SMMA obligation on that basis. The Discussion Paper accompanying the exposure draft of the Rules echoed this sentiment, noting that messaging services are 'widely believed to provide benefits of connection that outweigh the risks of harm to young people' and again explicitly naming WhatsApp as an example of a messaging service that should be exempt.

§ 47G(1)(b) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

-
- A horizontal bar chart with three groups of bars, each representing a different demographic group. Each group contains four bars of varying lengths, representing different percentages. The bars are gray and set against a white background with light gray grid lines.
- | Demographic Group | Bar 1 (Leftmost) | Bar 2 | Bar 3 | Bar 4 (Rightmost) |
|---------------------|------------------|-------|-------|-------------------|
| Men | ~15% | ~95% | ~98% | 100% |
| Women | ~92% | ~98% | ~95% | ~98% |
| High School or less | ~95% | ~98% | ~92% | 100% |

Messenger and Threads

Meta confirms eSafety’s understanding that Messenger currently requires end-users to hold a Facebook account and Threads currently requires end-users to hold either a Facebook or Instagram account.

s 47G(1)(b)

[Redacted text block]

Engagement with eSafety

Finally, Meta appreciates eSafety’s efforts to explain its regulatory approach. s 47G(1)(b)

[Redacted text block]

[Redacted text block]

[Redacted text block]

Yours sincerely

s 47F

[Redacted signature block]

12 September 2025

Dear eSafety Commissioner,

We refer to your letter dated 4 September 2025 providing an update on eSafety's progress on the development of regulatory guidance and Kick's assessment of why Kick is an age-restricted social media platform.

Social Media Minimum Age Obligations (SMMA)

We thank eSafety for providing guidance on what social media platforms should be doing now in preparation for the SMMA obligation taking effect on 10 December.

We confirm Kick is progressing solutions including:

- The deactivation of accounts held by end-users under 16
- Providing early, clear and age-appropriate communications to affected end-users
- Taking reasonable steps to prevent current Australian end-users under 16 with accounts from increasing their declared age to over 16
- Taking reasonable steps to prevent existing Australian end-users under 16 from opening new accounts indicating they are over 16
- Preventing manipulation of our settings to otherwise allow under 16 Australian end-users from holding a Kick account
- Taking reasonable steps to ensure new account holders are over 16

We can also confirm that Kick is engaging with third-party age assurance providers to assist us and integrate with age-estimation and age-verification technologies. We are taking this action with the principles eSafety highlighted during the Consultation on Reasonable Steps in mind. We look forward to the upcoming guidance in the coming weeks.

Kick as an age-restricted social media platform

Kick has completed the social media age restrictions assessment made available by eSafety at:

<https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions/assessment>.

1. *Is the service an 'electronic service'?*

Yes.

2. *Is any of the material on the service accessible, or delivered to one or more end-users in Australia?*

Yes.

3. *Does the service allow end-users to post material on the service?*

Yes.

4. *Does the service allow end-users to link to, or interact with other end users?*

Yes.

5. *(a) What is the purpose of the service? (b) Does the purpose include enabling online social interaction between two or more users?*

The purpose of the service is a livestreaming platform. The purpose includes enabling online social interaction between two or more users.

6. *Is online interaction the sole purpose or a significant purpose?*

Online interaction is a significant purpose.

7. *Is service excluded under the Online Safety (Age-Restricted Social Media Platforms) Rules 2025?*

No.

As a result of this assessment, we have concluded Kick is an age-restricted social media platform. Please do not hesitate to contact us at s 47G(1)(a) @kick.com.

Kind regards,
Kick Trust & Safety



10 September 2025

To: Ms. Julie Inman Grant
eSafety Commissioner
PO Box Q500
Queen Victoria Building
Sydney 1230

Via: s 47E(d) [\[REDACTED\]@eSafety.gov.au](mailto:[REDACTED]@eSafety.gov.au)

Dear Julie,

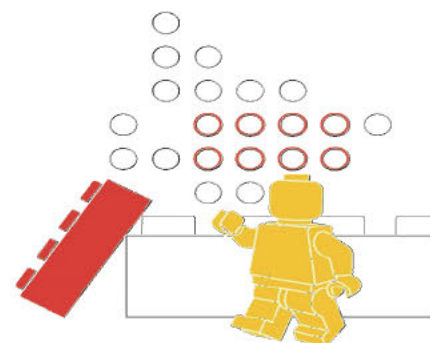
Thank you for your letter (Ref. CC25-0102) dated on 4 September 2025.

We note the efforts undertaken by you and your office on the implementation of the Social Media Minimum Age (SMMA) Act, and appreciate the acknowledgement and consideration of our position on the LEGO Play App.

We reviewed the LEGO Play App against the guidance published to assist services to self-assess whether a service is an age-restricted social media platform self-assessment tool that was published by your office last week, and continue to believe that the LEGO Play App is not an age-restricted social media platform. The summary of our self-assessment is attached in **Annex A** for your reference.

At the LEGO Group, we believe that children are our role models and we on a mission to inspire and develop the builders of tomorrow. In doing so, our approach in creating play experiences for children (physical or digital) prioritises the safety and well-being of children at its core; this means that the play experiences we create for children are designed to help them develop important life skills through safe, fun and playful experiences. To grow the evidence and knowledge on digital play features that contribute to children's well-being, we co-founded the [Responsible Innovation in Technology for Children \(RITEC\)](#) Project with UNICEF. As articulated in our last communication, the research findings found that positive social interactions in safe environments benefit children's learning of social skills, can contribute to different forms of creative play and improve their wellbeing. The LEGO Play App is an example of a product that we have built with this approach, and we continue to believe that the App provides a safe and well-being enhancing space for children to develop important skills to thrive in the 21st century.

In addition, we are also firm believers that children, families, and society at large stand to benefit from digital policies that are pragmatic, constructive, and evidence-based. Children and youths are important stakeholders in the digital environment and their voices provide an important perspective to be considered for the development of digital policies. To support the participation





of children and youths in tech policy design in Australia (and the world), we are sponsoring the Tech Policy Design Insititute's program for this purpose.

We are excited to continue to contribute to the development of children and to bring positive play and learning opportunities throughout their childhood within a supportive policy environment. We hope that your consideration of the LEGO Play App in relation to the SMMA Act would be favourable and continue to encourage my colleagues and I in our ambition to create play experiences for children with safety and well-being at its core.

We look forward to your positive response on our position, and my colleague, Ms Zhenyi Ng, remains available to engage with you and your office should there be any further questions or clarifications.

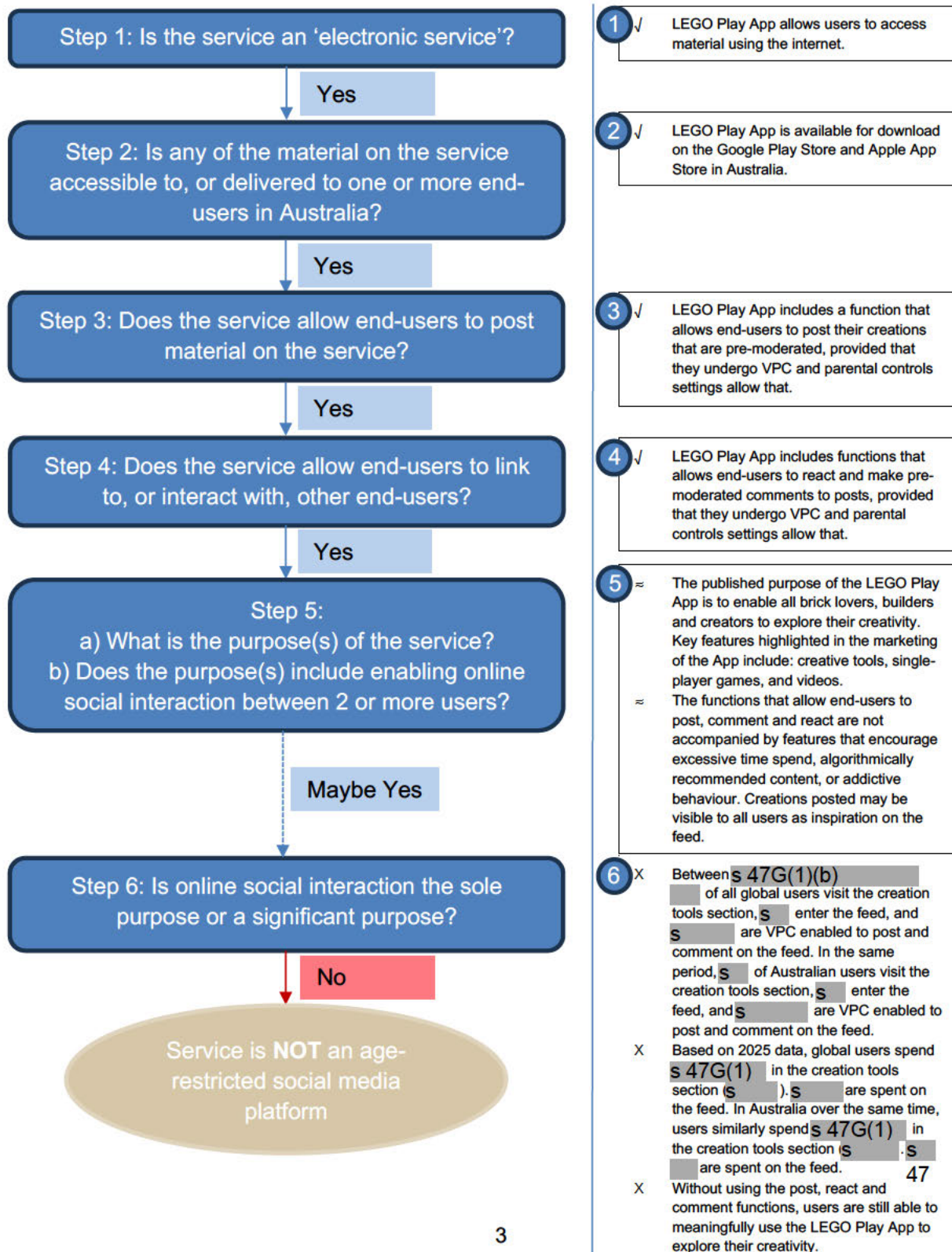
Thank you.

Yours Sincerely,

s 47F



Annex A: E-Safety Commissioner's Age-restricted Social Media Platform Self-Assessment Guidance: LEGO Play





CONFIDENTIAL

12 September 2025

Via email (s 47E(d)) [redacted] **@esafety.gov.au)**
cc: (s 47E(d)) [redacted] **@esafety.gov.au**

Ms Julie Inman Grant
eSafety Commissioner
PO Box Q500, Queen Victoria Building
NSW 1230
Australia

STRICTLY PRIVATE & CONFIDENTIAL

Re: Applicability of Australia's Social Media Age Restrictions to Pinterest

Dear Ms Inman Grant,

Thank you and the eSafety team for meeting with the Pinterest team on 12 August 2025 and with myself and (s 47F) [redacted], on 11 August 2025 to discuss Australia's upcoming social media minimum age obligation ("**SMMA obligation**"). We also thank you for your letter of 4 September 2025 and welcome the opportunity to provide this response, which sets out in further detail why we consider Pinterest out of scope of the SMMA obligation.

Please note that the information we have provided in this response is provided on the understanding that it will be treated by eSafety as confidential as it contains information that is not known or available to the public. Accordingly, we respectfully request that the contents of this letter will not be disclosed outside of eSafety, save where eSafety is legally permitted or required to do so. In the event eSafety intends to disclose this information to a third party, Pinterest kindly requests that eSafety consults with us before doing so to ensure that we have a reasonable opportunity to make representations concerning any disclosure.

I. Executive Summary


Pinterest is designed, built and used as a search and discovery platform. (s 47G(1)(a), s 47G(1)(b)) [redacted]

Therefore, we do not fall within the definition of "age-restricted social media platform" as defined


in the *Online Safety Amendment (Social Media Minimum Age) Act 2024* (the “**Amendment**”) and as such, we do not consider Pinterest in scope of the SMMA obligation.

II. How Pinterest is used


s 47G(1)(a), s 47G(1)(b)




To aid a user’s search journey, Pinterest shows visual recommendations called Pins. Pins can be created by users uploading photos or videos or bookmarking content from the web and optionally providing a text caption, although as further discussed in [Section III\(d\) \(Content on Pinterest\)](#), s 47G(1)(a), s 47G(1)(b)



Users can then save and organise these Pins into collections called boards. Boards allow users to refine their personal style, interests and goals. This can be anything from a list of books they want to read, to inspiration for a home renovation. s 47G(1)(a), s 47G(1)(b)




Pinterest is therefore largely a space for personal experience, as the primary purpose is to facilitate users in finding, exploring, collecting and curating discovered or uploaded Pins into boards. s 47G(1)(a), s 47G(1)(b)



Boards do not need to be shared with anyone to get the full value of Pinterest’s service. Pinterest users can engage in creative, educational and inspirational activity as they build boards that match their style, interests or goals without

s 47G(1)(a), s 47G(1)(b)



concern for social validation and engagement. Importantly, creating a Pin or saving a Pin to a board is not the same as making a post on a social media site. Pins are not broadcast to a user's network and the Pin is not highlighted through notifications or alerts. Users can choose to keep uploaded Pins private, or make them public with comments turned on or off.

s 47G(1)(a), s 47G(1)(b)

Our goal is to continue to enable a meaningful and productive experience that empowers our users to go from discovering a great idea online, to implementing that idea in their real life. In order to do so, s 47G(1)(a), s 47G(1)(b)

III. User engagement with our features and functions

As detailed in [Section II \(How Pinterest is used\)](#), s 47G(1)(a), s 47G(1)(b)

Pinterest has undertaken a stocktake of each feature and function that might be considered to be an enabler of social interaction in accordance with Step 6 of eSafety's age restricted social media platform self-assessment guidance (the "**Guidance**")⁶ to determine whether they might be considered a "significant" purpose of Pinterest. The qualitative and quantitative analysis detailed in the following paragraphs of this section highlight s 47G(1)(a), s 47G(1)(b)


⁶ s 47G(1)(a), s 47G(1)

⁷ s 47G(1)(a), s 47G(1)

⁸ "


<https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions/assessment#step-6>

s 47G(1)(a), s 47G(1)(b)




a) Following/Followers

s 47G(1)(a), s 47G(1)(b)



Pinterest offers a private profile for all users, as the only option for users under the age of 16, and as the default option for users aged 16 and 17. Private accounts are undiscoverable on Pinterest search and search engines, and Pinterest profiles, boards and Pins for these users are only visible to followers approved by the user. Users with private profiles may only be “followed” if the user sends a unique profile link to the prospective follower. Unique profile links act as an invitation and must be shared off-platform (such as by text, email or third party messaging apps). These safeguards mean that younger users are typically not meeting and connecting with new people on Pinterest, but rather only connecting with people they already know.

s 47G(1)(a), s 47G(1)(b)



⁹ s 47G(1)(a), s 47G(1)(b)

¹⁰

¹¹

s 47G(1)(a), s 47G(1)(b)

In addition, as explained above in [Section II \(How Pinterest is used\)](#) and in [Section III, part \(d\) \(Content on Pinterest\)](#) below, users do not come to Pinterest to post pictures of themselves, nor do they post on Pinterest with the intention of becoming viral or gaining followers, especially as s 47G(1)(a), s 47G(1)(b)

b) Messaging

s 47G(1)(a), s 47G(1)(b)


c) Commenting

s 47G(1)(a), s 47G(1)(b)

¹² s 47G(1)(a), s 47G(1)


¹³ s 47G(1)(a), s 47G(1)

s 47G(1)(a), s 47G(1)(b)



Additionally, we have implemented additional safeguards to keep teens safer in the comments section of a Pin. Users under 16 cannot be mentioned or tagged in comments and usernames are optionally disabled.


s 47G(1)(a), s 47G(1)(b)



d) Content on Pinterest

As explained in [Section II \(How Pinterest is used\)](#), our users come to Pinterest to find visual ideas and inspiration and save and organise these Pins into boards to refine and curate interests, ideas and goals. Pinterest is not a place where users come to post personal or family photos to share and discuss with their friends and family.

s 47G(1)(a), s 47G(1)(b)




As shown from the data above, rather than uploading their own content, our users primarily come to Pinterest to find and save Pins. It's important to note that where a user saves a Pin to a board or "Repins", this works as a bookmark for an individual to revisit later, rather than as a public conversation starter or social broadcast to that individual's followers accompanied by a cascade of notifications

s 47G(1)(a), s 47G(1)(b)



s 47G(1)(a), s 47G(1)(b)




¹⁴ s 47G(1)(a), s 47G(1)(b)

¹⁵


¹⁶



s 47G(1)(a), s 47G(1)(b)



s 47G(1)(a), s 47G(1)(b)



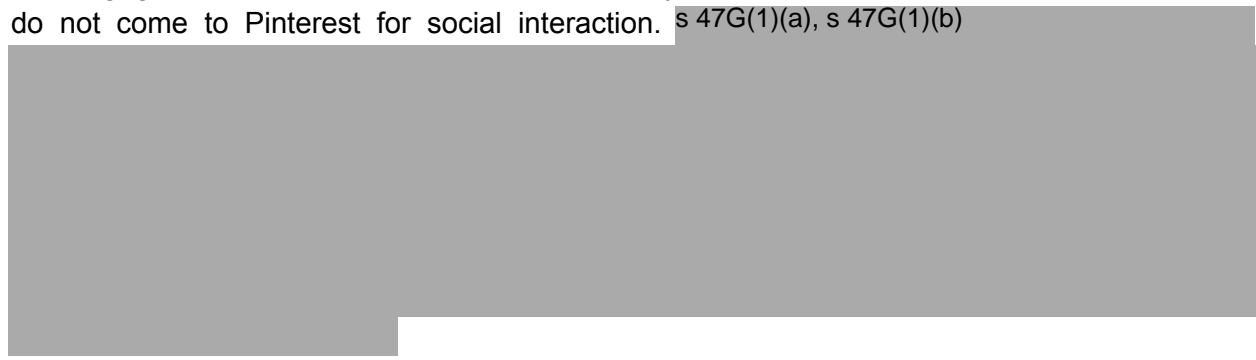
In addition, as described above, profiles for users under 16 are set to private only, and set to private by default for users age 16 and 17. Private profiles are undiscoverable and access is restricted to people to whom the user has shared an invite link off-platform. These safety-by-design choices further limit public posting and network building by teens.

Finally, we do not have livestreams or ephemeral media, both of which are types of content that encourage real-time social interactions using scarcity and urgency and which are often boosted by social media platforms due to high-engagement by users, encouraging more time-spent on platform, social ranking and peer-to-peer interaction.

¹⁷ s 47G(1)(a), s 47G(1)(b)

IV. Why Pinterest does not fall within the definition of “Age-restricted social media platform”

As detailed in the above section, our functions and features that could be considered “social” do not materially influence user behaviour by encouraging social interaction, and the actual use and engagement on Pinterest, as demonstrated by the data set out above, confirms that people do not come to Pinterest for social interaction. s 47G(1)(a), s 47G(1)(b)



In light of the above, and consistent with the test set out in the Amendment and Guidance, Pinterest's “sole” or “significant” purpose is definitively not to enable social interaction, but rather, is designed, built and actually used by our users as a visual search and discovery platform. Pinterest therefore does not meet the definition of “age-restricted social media platform”. We would respectfully request that eSafety confirm Pinterest is out of scope of the SMMA obligation accordingly.

V. Pinterest’s commitment to online safety

At Pinterest, we have a longstanding and industry-leading commitment to making our platform a safe place for everyone, especially young people, and this will not change based on the inapplicability of the SMMA obligation to Pinterest. As discussed in our meeting on 11 August, s 47F’s view is that companies should be competing on safety, and digital platforms should be doing more to keep teens safe online. Pinterest is committed to being a leader in online safety. Accordingly, we have designed and continue to develop our platform with safety for all global users as a priority, regardless of whether users in a particular country are protected by online safety regulation. The results of our comprehensive risk assessments conducted for compliance with laws in other jurisdictions (such as the European Union’s Digital Services Act and the United Kingdom’s Online Safety Act) show that our risk levels are generally low, in light of our effective mitigation measures.

We have implemented robust Community Guidelines which prohibit various types of content, including content that might be particularly harmful to young people. These Community Guidelines are carefully developed and continuously iterated on, based on reports from people using our service, information from outside experts, trends we have identified on other platforms and ongoing penetration testing of our own service. Our teams comprehensively operationalise

these policies, utilising user reports as well as manual and automated content moderation processes, to enforce against violations of our policies that may be harmful to all users, including teens. In Q4 2024, 77% of Pins deactivated for hateful activities were removed before being seen by a single user; 73% of Pins deactivated for self-injury or harmful behaviour were removed before being seen by a single user; and 98% of Pins deactivated for violence were removed before being seen by a single user.¹⁸ Indeed, eSafety's own research into online harms found Pinterest to be a uniquely safe platform compared to other online platforms in the study.¹⁹

In addition to moderating for harmful content, Pinterest consistently accounts for minors' safety and wellbeing when considering and implementing functionalities and features. s 47G(1)(a), s 47G(1)(b)

In addition, where appropriate, we display advisories in response to certain search terms for sensitive topics which connect users with free, country-specific support resources and helplines. We also engage in various media literacy measures, including providing articles on safety, privacy, content personalisation, and wellness throughout our Help Centre; publishing robust global transparency reporting; using AI to show representation of various body types, skin tones, and hair patterns in search results; and promoting civility and respect online with a just-in-time reminder which surfaces the first time a user makes a comment, reminding them that comments should be kind, purposeful and constructive.

Pinterest is a founding signatory of the Inspired Internet Pledge, an industry wide initiative created by the Digital Wellness Lab at Boston Children's Hospital in collaboration with Pinterest. The Inspired Internet Pledge aims to unite the tech industry with the common goal of making the internet a safer and healthier place for everyone, especially young people.²⁰ As part of this pledge, Pinterest has partnered with academics at UC Berkeley to conduct research and publish a 'Field Guide to Non-Engagement Signals'.²¹ This field guide provides actionable guidance for how online platforms can tune for emotional well-being. Pinterest prioritises tuning for wellbeing by using a combination of explicit engagement signals like saves, rigorous enforcement of community guidelines, and survey-based personalisation to give Pinner's a feed of high-quality

¹⁸ <https://policy.pinterest.com/transparency-report-h2-2024>; the data in this sentence relates to Q4 2024 and whether users saw the Pin during the reporting period of Q4 2024.

¹⁹

<https://www.esafety.gov.au/sites/default/files/2025-07/Digital-use-and-risk-Online-platform-engagement-10-to-15.pdf?v=1756795479844>

²⁰ <https://newsroom.pinterest.com/en-gb/news/the-inspired-internet-pledge/>

²¹ <https://medium.com/pinterest-engineering/the-field-guide-to-non-engagement-signals-a4dd9089a176>; <https://arxiv.org/abs/2402.06831>


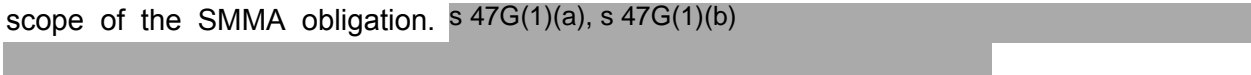
content that's tuned to inspire them.²² The success of Pinterest's commitment to tuning for wellbeing is evidenced in recent research by USC into negative personal experiences online. The research showed that compared to a broad range of online platforms, "Pinterest obtained the lowest rate of these negative experiences in between August and October of 2023 and has maintained that ranking ever since."²³

We are committed to continually reviewing and updating our safety policies and tools based on evolving risks and technological solutions to achieve our goal of providing a safe and positive platform for our users, regardless of the fact we are out of scope of the SMMA obligation. In addition, we note that Pinterest is still regulated under the Australia Online Safety Act (the "**Act**") and is subject to the relevant codes as a Relevant Electronic Service ("**RES**"), as designated by eSafety on 13 January 2025. Pinterest is committed to compliance with such and we have taken steps to address the residual obligations under the Act in addition to the steps we have already taken mentioned above. For example, we have already published a Help Centre article to provide resources to individuals in Australia and to comply with the Act.²⁴

We note eSafety's concern that Pinterest previously declared itself a social media service ("**SMS**") under the Act in 2023. At that time, we were required to nominate a category. We nominated SMS as the closest analogue because eSafety had not yet approved codes or standards for RES. However, we are not, and were not an SMS. We agree with eSafety's recent designation of Pinterest as a RES. We are happy to work together with eSafety to ensure the correct designation.

VI. Age assurance methods

As discussed during our consultation meeting, we understand that information regarding the practical application and implementation of age assurance technologies are of great interest to eSafety, particularly to consider the best practices and recommendations for services that are in scope of the SMMA obligation. s 47G(1)(a), s 47G(1)(b)






²² <https://medium.com/pinterest-engineering/healthier-personalization-with-surveys-65177cf9bea8>

²³ <https://psychoftech.substack.com/p/social-media-experiences-across-nearly>

²⁴ <https://help.pinterest.com/en-gb/article/australia-online-safety-act>

s 47G(1)(a), s 47G(1)(b)



VII. Next Steps

Pinterest is grateful for the opportunity to present this written submission. We welcome further engagement as part of this process, and if it would be of assistance, we would be happy to elaborate on or discuss any of the points raised in this submission with eSafety. Thank you for your engagement and we look forward to hearing from you.

Yours sincerely,

s 47F



Pinterest, Inc



15 September 2025

Julie Inman Grant

eSafety Commissioner

By email: s [REDACTED] [@esafety.gov.au](mailto:s[REDACTED]@esafety.gov.au)

Cc: s 47E(d) [REDACTED] [@esafety.gov.au](mailto:s[REDACTED]@esafety.gov.au)

Dear Julie,

Thank you for your letter dated 4 September 2025, regarding the Social Media Minimum Age (SMMA) obligations and the guidance on how to assess whether a service is considered an age-restricted social media platform under the Online Safety Act 2021. We appreciate the ongoing guidance from eSafety as we work to understand and prepare for these new requirements.

We understand that the SMMA obligations are set to take effect on 10 December 2025 and that eSafety will be conducting its own preliminary assessment of Twitch. s 47G(1)(a), s 47G(1)(b)

[REDACTED]

[REDACTED]

We always appreciate eSafety's transparency and openness to discuss these matters directly, and we would like to schedule a follow-up meeting with your team at the earliest opportunity. We look forward to continuing our constructive engagement and working together to achieve the intended outcomes of the SMMA obligations.

Sincerely,

s 47F

[REDACTED]

ROBLOX
corp.roblox.com

3150 S Delaware St
San Mateo, CA
94403

15 September 2025

Julie Inman Grant
eSafety Commissioner

By email: s 47E(d) @esafety.gov.au

Copy to: s 47E(d) @esafety.gov.au
s 47E(d) @esafety.gov.au
s 47E(d) @esafety.gov.au

Dear Julie,

Thank you for your letter of 4 September 2025.

As requested, we are writing to provide eSafety with information we consider relevant to the assessment of whether Roblox is an age-restricted social media platform (**ARSMP**), including whether Roblox is excluded under the Online Safety (Age Restricted Social Media Platforms) Rules 2025 (**Rules**).

Thank you for sharing your guidance on how to assess whether a service is an ARSMP. We have considered this guidance in finalising our assessment of whether Roblox meets the definition of an ARSMP.

In our view, Roblox does not meet the definition of an ARSMP in section 63C(1)(a) of the *Online Safety Act 2021* (**OSA**) - s 47G(1)(b)

In any event, in our view it is clear that Roblox is excluded under section 63C(6)(b) of the OSA, which provides that an electronic service is not an ARSMP if it is a service specified in the Rules. Section 5(1)(b) of the Rules specifies "services that have the sole or primary purpose of enabling end-users to play online games with other end-users".

The primary purpose of Roblox is to enable end-users to play online games with other end-users. Online gameplay between end-users is fundamental to Roblox - it is the predominant and most important purpose of our platform. End-users access Roblox to



play online games with other end-users. If we were to take away the ability for end-users to play online games with other end-users, Roblox wouldn't be Roblox.

s 47G(1)(b)

In the Discussion Paper that accompanied the exposure draft of the Rules, the Government expressly acknowledged that Roblox would be excluded from being an ARSMP, stating that section 5(1)(b) of the Rules "would exclude games such as **Roblox**, Fortnite and Minecraft". We agree with this position and think it is clear that Roblox falls within the scope of the section 5(1)(b) exemption.

Yours sincerely,

s 47F

s 47F





SERVICE ASSESSMENT

SMAA OBLIGATIONS

17-09-2025

s 47F

Service Assessment of The Hub App

for SMMA Obligations

We recommend that The Hub app not be classified as an age-restricted social media platform under the Online Safety Act 2021 and the Online Safety (Age-Restricted Social Media Platforms) Rules 2025.

Purpose and Design of The Hub

The Hub is a purpose-built platform designed to enable organisations to manage their people, programs, and content within safe, closed digital environments. It was developed as an alternative to mainstream social media, with a deliberate focus on humane technology and an architecture of e-Safety using the online safety act (2021) as a framework.

The platform's core function is to support internal organisational operations, not to facilitate open-ended social interaction. It is sold exclusively via a B2B SaaS model, meaning all usage occurs within the context of a business or not-for-profit organisation's internal structure.

The Hub Is NOT a Social Media Platform

The Hub does not meet the criteria outlined in Section 63C of the Online Safety Act, which defines an age-restricted social media platform as a service with the **sole or** significant purpose of enabling online social interaction between end-users

Key exclusions in The Hub's design include:

- No infinite scroll or autoplay
- No engagement-based reward mechanisms
- No algorithms driven content feeds
- No ephemeral content
- No dopamine-driven comments/engagement
- No encouragement to increase engagement
- No advertising built into the platform
- No on-selling of data
- No promotion of discovering or connecting with other users on the platform.

These features are intentionally omitted to prevent addictive or socially driven usage patterns. Any interaction on the platform is functional and task-oriented, such as accessing training materials, coordinating events, or managing logistics.

Nature of User Interaction

Interactions on The Hub are limited to closed groups within an organisation. There is **no** public posting, no follower systems, and user discovery. Communication is structured and purpose-driven, aligned with the operational needs of the organisation and provides transparent digital oversight for the organisation.

Even though many of our clients are not-for-profits (e.g. schools, churches, charities), The Hub's usage model aligns as 'online business interactions', not social media. Our clients use of the platform is strictly organisational.

Applicability of Excluded Service Classes

We believe The Hub qualifies under Section 5(1)(g) of the Online Safety (Age-Restricted Social Media Platforms) Rules 2025, which excludes services that have a significant purpose of facilitating communication between educational institutions and students or families

While schools and early learning centres are not our primary client base, they do represent over 15% of our user base.

In addition to this our remaining 85% of clients use The Hub for one or more of the following educational uses:

- Distribute educational and organisational content
- Coordinate professional development events
- Manage day-to-day logistics of their programs
- Distribute training material

This further supports our position that The Hub is not designed or used as a social media platform and should therefore be excluded from classification under the age-restriction framework.

Commitment to Safety and Compliance

The Hub was built with e-Safety principles at its core. We remain committed to maintaining a safe, respectful, and transparent environment for all users, and we continue to align our practices with the Basic Online Safety Expectations outlined in the Act.

s 47F



GitHub



88 Colin P Kelly Jr Street,
San Francisco, CA 94107
Tel: 415-448-6673 (main)

September 18, 2025

Julie Inman Grant
eSafety Commissioner

by email: s 47E(d) @esafety.gov.au
cc: s 47F @github.com s 47F @microsoft.com

Dear Commissioner Grant:

Thank you for your correspondence dated September 4, 2025. We appreciated the opportunity to participate in eSafety's consultation and share our thoughts on implementation of the Social Media Minimum Age Act. I am writing to let you know that, due to recent developments and engagement with your Industry Codes and Standards Enforcement Team, we now understand GitHub's service classification under the Online Safety Act is as a Model Distribution Platform (a form of DIS), not a social media service, nor an age-restricted social media platform.

GitHub is not a Social Media Service

The Enforcement Team affirmatively reached out to us after the Designated Internet Services Industry Standard - Class 1A and Class 1B Material was finalized, to discuss compliance planning for the DIS Standard. The Enforcement Team repeatedly informed us that we do not qualify as a Social Media Service, but rather, a Designated Internet Service (DIS), and in particular, a Model Distribution Platform. During these discussions, eSafety's position was explained as follows:

[W]e do not consider that Github's 'sole or primary purpose' is 'online social interaction'. That 'individual developers, hobbyists, students, and open-source projects that share their code on the platform' use the service for 'personal reasons' is not the same as doing so for the purposes of 'social interaction', nor is it the same as any social interaction being the 'sole or primary purpose' of the service. (June 20, 2025 correspondence with s 22).

GitHub accepts and understands eSafety's position and reasoning, as outlined by the Enforcement Team. In reliance on this information, we have been working to align with the applicable requirements.

The September 4 letter suggests that a service may be considered an “age-restricted social media platform” despite the fact that it is not a social media service. Putting to one side whether this is possible—something we do not concede¹—this is not an issue for GitHub. The eSafety Enforcement Team has informed us that what occurs on our platform is not “online social interaction.” Thus, we cannot possibly meet the definition in Section 63(C)(1)(a) (to qualify as an “age-restricted social media platform,” “the sole purpose, or a significant purpose, of the service is to enable *online social interaction* between 2 or more end-users”) (emphasis added).

Before being informed of the Commission’s position that code collaboration on our platform does not qualify as “online social interaction,” GitHub presented information to the Commission advocating for a class exemption for software development collaboration platforms. (See “GitHub Supplementary Submission in Response to the Draft Online Safety (Age-Restricted Social Media Platforms) Rules 2025 Consultation”). We believe those reasons continue to apply and I was informed that they were well-received. But this appears to be a moot point, as GitHub does not meet the threshold requirement of Section 63(C)(1)(a).

To sum it up, based on the advice of the eSafety Enforcement team, we now understand that GitHub is neither a social media service, for purposes of section 13, nor meets the threshold requirement of Section 63(C)(1)(a). If this is not eSafety’s understanding, please explain the basis to treat GitHub differently under Section 63(C)(1)(a) than Section 13.

Of course, if it is preferable to schedule a call or meeting to discuss this matter, we are happy to do that as well.

We very much appreciate your attention to this matter and any thoughts you might have.

Best wishes,

s 47F

GitHub, Inc.

¹ It is not feasible for an individual service to comply with multiple regulatory regimes. This is explicitly recognized in other areas of the OSA regulatory framework, most notably where Industry Codes and Standards specify adherence to one option to the exclusion of others. Should the eSafety Commission like more detail on this position, we’re happy to provide more information.

From: s 47F @match.com>
Sent: Thursday, 18 September 2025 10:27 AM
To: eSafety Commissioner; eSafety Industry Supervision; Social Media Minimum Age Restrictions
Cc: s 47F @match.com; s 47F; s 47F; s 47F
Subject: Re: Amended: CC25-0109_Correspondence from eSafety Commissioner | Social Media Minimum Age (SMMA) Obligations [SEC=OFFICIAL]

You don't often get email from s 47F @match.com. [Learn why this is important](#)

Dear Julie and team,

Thank you for taking the time to meet with me this week — and for your letter, and the clarity provided regarding eSafety's forthcoming assessments and regulatory guidance.

Match Group services and applicability of SMMA

We note eSafety's preliminary view that some Match Group services may fall within the definition of "age-restricted social media platforms" under section 63C of the Online Safety Act 2021. As discussed previously, because we believe that we have taken strong steps to prevent Australians *under 18* (not just under 16) from accessing our services, and therefore are in compliance regardless of whether we fall within the definition of "age-restricted social media platform," we have not taken a position on whether we are covered by the SMMA. However, to show that we are in compliance, and to reiterate our previous discussions, we set forth below our current age assurance measures.

Our current age assurance measures

We confirm that Match Group already applies minimum age restrictions and undertakes age assurance measures across our services.

Individuals *under the age of 18* are strictly prohibited from using our dating platforms. We enforce this policy through a robust combination of technological solutions and human oversight, aimed at preventing underage access and ensuring platform integrity.

We agree that merely requesting age disclosure is insufficient as a standalone age assurance measure. While it serves as a first step, we implement multiple layers to ensure better accuracy and deterrence:

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- App store restrictions: All Match Group apps are rated 17+ on iOS (the highest available setting) and 18+ on Google Play. Properly configured parental controls can effectively prevent minors from downloading or accessing these services. We also adopt emerging tools, such as Google's "Restrict Declared Minors" feature,
- as they become available.
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- Age-gating at registration: If a user provides a birthdate indicating they are underage,

- the account is automatically blocked. Users who enter an incorrect birthdate may regain access only through verification with a government-issued photo ID. Because we collect identifying information (e.g., phone number, email) prior to requesting age, we can
- prevent re-registration using the same credentials and from the same device until the user reaches the age of eligibility. Notably, our age-gating does not display a prompt requiring users to confirm they are 18+, which leads many underage individuals to self-attest
- truthfully, allowing us to block them at the outset.
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- Image and text-based moderation: We employ a combination of automated tools and human oversight to detect potential underage users. Profile photos are scanned using AI-powered image moderation, with flagged accounts escalated to human moderators for review. In parallel, we use machine learning classifiers and keyword detection to flag language
- in profiles and messages commonly associated with underage users.
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- In-app reporting: Users can easily report suspected underage profiles for immediate review.
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- Photo ID verification: Users who are banned or flagged for suspected age violations may
- appeal by verifying their identity with a valid government-issued photo ID.
-

We continue to invest in strengthening our age assurance systems. Most recently, we completed a large-scale benchmarking initiative to validate the accuracy and recall of our AI-based image moderation capabilities, and as we discussed in our 15 September meeting, are using those findings to continuously improve and retrain the underlying models. We are likewise excited about the introduction of Face Check on Tinder in Australia, which may offer additional opportunities for liveness-based age estimation in the future.

Preparation for SMMA commencement

We acknowledge eSafety's expectations for platforms, in particular:

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- readiness to identify and deactivate accounts held by under-16 Australian end-users;
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- clear, age-appropriate communications to affected users;
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- mechanisms to prevent circumvention; and
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- transparent and fair reporting and appeals processes.
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While we believe the strong safeguards described above, designed to prevent under-18 individuals from joining our platforms, already address eSafety's expectations, we are constantly evaluating our age assurance methodologies across the globe. Once published, we will review eSafety's guidance and will incorporate any relevant suggestions to ensure that we meet the standards for keeping under 16s off of our platforms.

Thank you again for the constructive engagement and the opportunity to contribute to the development of clear and practical regulatory guidance.

s 47F

On Thu, Sep 4, 2025 at 9:27 AM s 47F <s 47F@match.com> wrote:
Hi s 22 thank you for this. We've received it and will review in due course.

s 47F

Match Group

s 47F <s 47F@match.com>

s 47F

On Wed, Sep 3, 2025 at 10:52 PM eSafety Commissioner s 47E(d) <[s 47E\(d\)@esafety.gov.au](mailto:s 47E(d)@esafety.gov.au)> wrote:

OFFICIAL

Dear s 47E

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

s 22

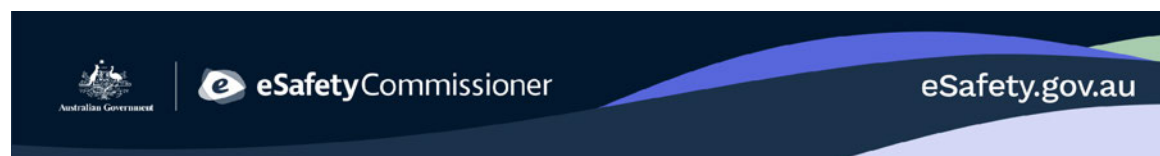
s 22

Executive Officer

Office of the eSafety Commissioner

 esafety.gov.au

 s 22 | 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.*

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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 Liam Lavery 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"). Mr. Lavery is travelling.

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 47F [@valvesoftware.com](mailto:s 47F@valvesoftware.com).

Sincerely,

s 47F





Reddit Australia
1 Sussex Street FL3
Suite 03W123
Barangaroo 2000 Australia

Julie Inman-Grant
eSafety Commissioner
Office of the eSafety Commissioner
Level 5, 65 Pirrama Road
Pyrmont NSW 2009

By email only to: s 47E(d) [@esafety.gov.au](mailto:s 47E(d)@esafety.gov.au)

25 September 2025

Dear Commissioner Inman-Grant,

Thank you for your letter dated 4 September 2025, and for kindly extending our response deadline. We appreciate the updates on the Social Media Minimum Age (SMMA) obligations and the opportunity to provide our views on Reddit's position under it.

Please see attached to this letter Reddit's self-assessment with regard to the SMMA. We have carefully reviewed the self-assessment tool and eSafety's regulatory guidance on the SMMA and are of the view that Reddit should **not be classified as an age-restricted social media platform. As explained in the letter, the sole or significant purpose of our platform is to provide knowledge-sharing in timely, context-rich conversations; interaction between end-users is simply an incidental step to enabling this primary purpose.**

We thank your office for their engagement on the SMMA to date and look forward to further constructive engagement on this matter.

Best,

s 47F

A large rectangular area of the document is completely redacted with a solid grey fill, covering the signature and any accompanying text or images.

Self-Assessment by Reddit regarding Status of Platform Under the Social Media Minimum Age laws

Introduction

This self-assessment of whether Reddit qualifies as an ‘age-restricted social media platform’ subject to section 63C of the *Online Safety Act 2021 (Cth)* (OSA) is conducted according to the self-assessment tool published by eSafety.¹ As set out in the guidance to the tool, the self-assessment also takes into account the Online Safety (Age-Restricted Social Media Platforms) Rules 2025 (‘2025 Rules’) and the social media minimum age (SMMA) obligations under the OSA.

Step 1. Reddit operates an ‘electronic service’ in the meaning of the OSA.

Because Reddit is a platform that enables end-users to access text and other content using the internet, Reddit is an ‘electronic service’ under section 63C of the OSA.

Step 2. Content on the Reddit platform is ‘accessible or delivered to one or more end-users in Australia’ in the meaning of the OSA.

End-users physically located in Australia may access content on the Reddit platform, with or without an account. Thus, content on the Reddit platform is accessible to, or delivered to, one or more end-users in Australia per section 63C(6)(a) of the OSA.

Step 3. Reddit allows end-users to post content on the Reddit platform in the meaning of the OSA.

End-users with accounts on Reddit (logged-in end-users) may post content to topic-based communities such as [r/Apple](#), [r/AskScience](#), [r/Swimming](#), and [r/AustralianPolitics](#), that are open or public spaces accessible to others. End-users without accounts may only view content on Reddit and cannot post, make comments or vote on content.

Step 4. Reddit allows end-users to ‘link to, or interact with, some or all of the other end-users’ on the Reddit platform in the meaning of the OSA.

End-users logged into their accounts on the Reddit platform may pseudonymously engage with each other or their material through ‘express reactions’ such as commenting on or upvoting posts from other end-users to express their sentiment about the content. This pseudonymous characteristic means there is no interaction or ‘linking’ between Reddit’s end-users and/or their content as commonly understood on other platforms that are centered on user profiles and peer-driven user interaction loops. Reddit is not a social network; users do not interact through shared connections or ‘friends.’ Regardless, within the guidance given for this self-assessment, the Reddit platform allows end-users to link to, or interact with,

¹ See <https://www.esafety.gov.au/about-us/industry-regulation/social-media-age-restrictions/assessment>.

some or all of the other end-users. However, we believe that this is an area where the guidance goes beyond the original intention of the legislation.

Step 5. The primary purpose of the Reddit platform is to provide knowledge-sharing in timely, context-rich conversations.

The purpose of the Reddit platform is to organise and make communal knowledge accessible for both seekers and contributors of information, particularly for information that relates to direct human end-user experiences or expertise. While this purpose enables online pseudonymous interaction between two or more logged-in end users, this interaction is merely incidental to the primary purpose of enabling knowledge and information sharing.

For example, [r/BabyBumpsandBeyondAu](#) is a top resource for Australian users seeking or sharing practical parenting advice and product information. One of the key topics discussed and questions asked within the subreddit relates to information on prams – namely, which is the best pram for a first time parent, and what are the benefits and detriments of prams available in Australia. Similarly, when leading sunscreens available in Australia were reported to have mislabeled SPF ratings, users on [r/AusSkincare](#) shared research, updates into recall statuses, links to journal articles, independent lab tests, and recommendations for alternate products.²

People also use the Reddit platform because it serves as the internet’s host of record on a range of sensitive topics, enabled entirely by its pseudonymous nature. This is particularly impactful for those experiencing long-standing issues or struggles, or are in situations where they may not want their contributions tied to their real-world identity. For example, [r/stopdrinking](#) – a support community designed ‘to motivate each other to control or stop drinking’ – allows users to pseudonymously seek support and ask questions for the primary purpose of obtaining information and knowledge, and for users to share their own experiences to assist others. An independently published, peer reviewed scientific paper³ analysed how these online support communities helped enable recovery for users and found:

These discussions highlighted to us that the Reddit platform enables knowledge to be sought, distributed, and discussed by the community. Responses to questions often included formal sources of information, like scientific research results, therapy approaches, new discoveries in the media, and the experiences of others, and was supported by the ability to directly link to content online via URLs. Additionally, some members disclosed that they felt the sense of anonymity provided by Reddit helped make them feel more open to sharing their personal experiences.⁴

Finally, civic leaders and agencies in Australia also regularly come to the Reddit platform to host Ask Me Anything (AMA) sessions, allowing the broader Australian population to question their representatives and improve their civic knowledge. For example, the Australian Electoral Commission regularly hosts AMA sessions on Reddit ahead of elections, to provide important information on how to vote and to help

² See https://www.reddit.com/r/AusSkincare/comments/1myk6od/choice_sunscreen_testing_megathread_ultra.

³ Robert P. Gauthier, Mary Jean Costello, and James R. Wallace. 2022. ‘I Will Not Drink With You Today’: A Topic-Guided Thematic Analysis of Addiction Recovery on Reddit. In CHI Conference on Human Factors in Computing Systems (CHI ’22), April 29-May 5, 2022, New Orleans, LA, USA. ACM, New York, NY, USA, 17 pages. <https://doi.org/10.1145/3491102.3502076>

⁴ See above, p 9.

dispel any concerns or confusion surrounding the electoral process. Australian politicians are also noted for holding real-time town halls with the AMA feature, providing constituents with a valuable opportunity to ask questions and obtain information on matters of public importance.⁵

Step 6. Online social interaction is neither the sole purpose nor a significant purpose of the Reddit platform in the meaning of the OSA.

While the Reddit platform's knowledge sharing function may enable 'online social interaction between two or more end-users' as defined in eSafety's self-assessment tool, this online social interaction is not the sole or significant purpose of Reddit. As discussed above, Reddit provides a platform for users to share knowledge and information; the online interaction is merely incidental to the knowledge and information sharing. Consequently, Reddit does not employ 'social' features and functions that underpin the concerning social interactions and addictive behaviours that the SMMA seeks to address.

As outlined in the explanatory statement to the SMMA, one of the key objectives to the SMMA is to address risks associated with platforms that foster addictive, manipulative, or socially-driven user interaction – particularly those that amplify social comparison, peer validation, and real-time social networking among children and young people. In contrast, Reddit's structure and user experience differ in several key respects.

First, Reddit is a pseudonymous platform organised around sharing information in topic-based communities rather than personal profiles or social networks. It is not in keeping with Reddit norms for users to use their real names or identities on Reddit, as communities are not centered around real-time social networking among young people. Unlike other platforms, end-users engage primarily for information, advice, and discussion on specific subjects – and not to build or maintain personal profiles or relationships.

The platform does not promote real-time presence, friend requests, or activity feeds that encourage users to follow or friend other users to drive ongoing engagement. Reddit does not support import of a person's friend lists or address book. One does not go to Reddit to find or socialise with one's friends or classmates. In addition, Reddit is committed to collecting minimal personal information from users to preserve pseudonymity on the platform. As such, recommender systems on the Reddit platform are centered around *content* in topic-based communities, and not the personal identities of the end-users who post.

Second, and critically, Reddit is by design an open platform and does not require users to sign into an account to access content. Logged-out users can and do use the service without receiving customised content recommendations or notifications.⁶ In Q2 2025, 55% of Daily Active Users from Australia on [Reddit.com](https://www.reddit.com) were logged-out. Thus, by design, enabling social interaction is clearly not Reddit's sole or significant purpose. The significant presence of logged-out daily active users, who are not able to post or

⁵ See <https://www.reddit.com/user/AusElectoralCom> for the AMAs hosted by the AEC; see also Zali Steggall OAM's [AMA session](#) in r/AustralianPolitics; Dr. Andrew Leigh MP's [AMA session](#) in r/AustralianPolitics; Adam Bandt MP's [AMA session](#) in r/Australia; and Malcolm Roberts MP's [AMA session](#) in r/AustralianPolitics.

⁶ Logged-out users get a 'Popular' feed, which showcases the most popular recent posts on Reddit, as determined by net upvotes for the region based on the users' IP-geo location. See <https://support.reddithelp.com/hc/en-us/articles/23511859482388-Reddit-s-Approach-to-Content-Recommendations>.

comment on content, or otherwise engage with other end users or their content, indicates that online social interaction is neither the sole nor significant purpose of the Reddit platform.

Third, the features of Reddit such as upvotes and downvotes are surgically tied to the quality or relevance of the content – they are not a social validation mechanism. Regardless of how prominent a Reddit user is, each and every post or comment they submit starts with only one upvote – a single, automatic vote that is purely cosmetic and doesn't count towards the user's karma score.⁷ This is in direct contrast to platforms where celebrities and influencers have an automatic followership on everything they submit, encouraging a social networking effect. Reddit users are pseudonymous and favour high quality answers and information, not personal popularity based on their identity. Users engage based on shared interests and the merit of contributions, not based on social profiles or follower counts. End-users on Reddit even created the Rediquette, which memorialises norms that voting or downvoting should be based solely on whether the content 'contributes to the conversation...or is off-topic in a particular community.'⁸

Consequently, while the Reddit platform does enable online social interaction between two or more end-users, both the design of the Reddit platform and its use by end-users to seek and share information demonstrate that knowledge-sharing and not online social interaction, is the significant purpose of the Reddit platform.

Finally, while not an element of the self-assessment tool, it bears mentioning that the overwhelming majority of Australian end-users of Reddit are adults, contributing to our view that it was not the original intention of Parliament to include platforms like Reddit within this legislation.

Step 7. Notwithstanding Reddit's status as a platform that does not have a significant purpose of enabling online social interaction per step 6, Reddit has a primary purpose to enable end-users to share information (such as reviews, technical support or advice) about products or services, which is an excluded service under Section 5(1) of the 2025 Rules.

End users primarily come to Reddit to seek or share information or recommendations. For example, approximately 40% of Reddit posts mention products or brands and 25% of the Reddit Answers⁹ query-stream has 'shopping intent' where users ask about a product.¹⁰ Every second on Reddit, an average of two people ask Reddit communities for a recommendation and receive an average of 14 personalised responses.¹¹ In the span of a week, that translates into over 950,000 posts requesting recommendations and 18 million responses in return.¹²

Consumers want quality product reviews that they can trust. They might have seen an influencer promote a product on a different platform, but they then come to Reddit precisely because its lack of profile-based social media features means it contains influencer-free information that is based on real world experiences and not subject to any incentives. The Sydney Morning Herald just last year reported that Reddit was the

⁷ See <https://support.reddithelp.com/hc/en-us/articles/204511829-What-is-karma> for further information on karma.

⁸ See <https://support.reddithelp.com/hc/en-us/articles/205926439-Rediquette>.

⁹ Reddit Answers is a search tool that allows users to enter a question and find a response based on topical discussions on Reddit, with in-line source links to the full discussions and relevant subreddits.

¹⁰ Reddit Insights powered by Community Intelligence, Global, 2024.

¹¹ Reddit Internal, Jan 2023-Dec 2023, Global.

¹² Reddit Internal, Jan 2023-Dec 2023, Global.

third most visited website in Australia in November 2024 and that '[a]s trust in search engines such as Google and brands themselves slowly erodes, consumers are turning to online communities, such as Reddit, for what they perceive to be more straightforward, reputable advice.'¹³ Consumers regularly add 'Reddit' to their searches on Google for product recommendations such as 'best hiking boots Reddit' and 'best cotton T-shirts Reddit' to get direct access to these types of answers and cut through the search engine optimisation and influencer spam. In the past year, people chose a Reddit result on Google Search over 23 billion times¹⁴ and 'Reddit' was the 10th most searched word by Australians on Google in the past year.¹⁵

The Reddit platform hosts a 'recommendation economy' built on trust. 74% of Australian users surveyed agree that Reddit conversations offer authentic experiences that make it easier to make an informed decision about a brand or product. This authenticity comes from consumers sharing their direct experience with the product in response to such questions as, '[Is the Volvo] XC90 good for 4 child seats?'¹⁶ or 'What's really the best electric SUV in 2024? Seeking honest thoughts on range, price, and overall value.'¹⁷ Consequently, 7 in 10 consumers surveyed are more likely to buy a product or brand if conversations on Reddit recommend it.¹⁸ Reddit conversations aren't just helpful in the moment – each post and thread becomes a living source of answers, insights, and validation for anyone asking the same questions weeks, months, or even years later. In fact, 57% of all Reddit posts that get views for over a year mention a brand or a product.¹⁹

Reddit is the number one destination for people to go for informed product information, with 51% of total online references to purchasing occurring on or in relation to the platform.²⁰ This value is also recognised by businesses and organisations. The Reddit Pro feature, which launched in 2024, is used by 1,238,037 businesses and organisations to analyse how and in which subreddits their brands are discussed. July Luggage, for instance, is often discussed in [r/BuyItForLife](#) and [r/HerOneBag](#). That insight allows July Luggage to assess consumer feedback and benchmark their suitcases amongst peers in the market. Thus, the prevalence of product reviews and recommendations and increasing use of Reddit Pro by businesses to draw insights on discussions about their brands underscores Reddit's primary purpose of enabling information sharing about products and services.

Conclusion

For the foregoing reasons, Reddit is not an age-restricted platform within the definition of section 63C of the OSA and is not in scope of the SMMA.

¹³ See <https://www.smh.com.au/lifestyle/fashion/fake-reviews-have-made-online-shopping-a-nightmare-can-reddit-help-20241128-p5kual.html>.

¹⁴ Google Bulk Data, Global, May 2023 - Apr 2024; See The Atlantic, June 2022 at <https://www.theatlantic.com/ideas/archive/2022/06/google-search-algorithm-internet/661325/>; Fast Company, February 2022 at <https://www.fastcompany.com/90722739/is-reddit-a-better-search-engine-than-google>.

¹⁵ See <https://trends.google.com/trends/explore?geo=AU&hl=en>

¹⁶ See https://www.reddit.com/r/VolvoXC90/comments/1gonc3a/xc90_good_for_4_child_seats.

¹⁷ See https://www.reddit.com/r/whatcarshouldibuy/comments/1dydq13/whats_really_the_best_electric_suv_in_2024.

¹⁸ These figures are from a 'Let's talk about your purchases & Social Media' survey conducted in January 2025 across 30,000 monthly users on Reddit in the United States, United Kingdom, Canada and Australia. 2,944 monthly users in Australia participated.

¹⁹ Reddit Internal, Jan 2023-Dec 2023, Global.

²⁰ Brandwatch, Global, Oct 2023 - Mar 2024.

Snap Inc.

1 October 2025

Julie Inman-Grant
eSafety Commissioner
65 Pirrama Road
Pyrmont NSW 2009
Australia

Dear Julie,

Thank you for your letter of 15 August and for the thoughtful conversation on 22 September. We are grateful for the opportunity to continue working together as we prepare for commencement of the Social Media Minimum Age (SMMA) law on 10 December 2025. As requested, we set out below our perspective on why Snapchat is not an age-restricted social media platform for the purposes of paragraph 63C(6)(b) of the Act because Snapchat has the primary purpose of enabling communication through messaging, email, voice calling, or video calling under paragraph 5(1)(a) of the 2025 Rules.

Snapchat is, and has always been, a messaging app. Since its founding, Snapchat was built so that close friends could communicate in the moment. While we have added ancillary features over the years, messaging remains the primary way our community uses Snapchat today.

The Government's [Online Safety \(Age-Restricted Social Media Platforms\) Rules 2025](#) recognize that not all platforms are the same. These Rules exclude a number of types of platforms from the minimum age obligation, including "services that have the sole or primary purpose of enabling end-users to communicate by means of messaging, email, voice calling or video calling." The Explanatory Statement later acknowledges that "[i]t is possible for a service to have additional purposes alongside the sole or primary purpose" and that "only the sole or primary purpose would be used to assess whether a service is not subject to the social media minimum age obligation in section 63D of the Act."¹

We understand that your role is to apply this law consistently and fairly. As outlined in the eSafety Commission's online self-assessment tool, a simple way to test a service's primary purpose is to determine whether users would continue to engage with the service if certain features and functions related to other purposes were removed. "If very little change is likely to occur in the number of end-users on the service, or the way that existing end-users use the service, then it is not likely that the purpose relating to those features and functions is the 'primary purpose.'"² Put simply, if Snapchat's non-messaging features were removed, would the

¹ [Explanatory Statement](#) to the Online Safety (Age-Restricted Social Media Platforms) Rules 2025, p.8.

² [eSafety Commissioner Self-Assessment Tool](#), Step 7.

way people use the service meaningfully change? For Snapchat, the answer is no. The data are clear that if Snapchat's ancillary features were removed tomorrow, people would still use Snapchat primarily to message and talk with their friends and family: only 4% of daily users polled said they would stop using Snapchat if it were limited to just its core communications functions.³

In addition, the Explanatory Statement of the SMMA Rules states that "[t]he sole or primary purpose of enabling communication through messaging, email, voice calling or video calling should be determined by considering the experience of end-users of the service."⁴ Our data show that in Q2 2025, more than 75% of the time spent by all Snapchatters in Australia, including those aged 13-17, was spent on private messaging, voice, and video calling. The end-user experience thus demonstrates that the primary purpose of Snapchat is messaging.

Moreover, third parties in Australia have also validated that messaging is Snapchat's primary purpose. Independent research conducted by Australia's [Reach Out, Beyond Blue and the Black Dog Institute](#) concludes that Snapchat is primarily used for messaging:

"[M]ore frequently using social media to communicate with people teens knew in real life was associated with lower symptoms of depression and anxiety. This may explain why a higher number of hours using Snapchat was not associated with any of the mental health symptoms examined, because Snapchat is a messaging app that adolescents primarily use to communicate with their friends."⁵

We are grateful that the Rules aspire to "support the best interests of the child by not unduly restricting access to services while safeguarding from harms and ensuring children and young people have continued access to beneficial online activities, including connecting with friends and family, access to community and support services, and participating in public life."⁶ We believe that Snapchat's exclusion under Paragraph 63C(6)(b) of the Act and Paragraph 5(1)(a) of the 2025 Rules is not only reflective of the letter of the law but also its spirit.

Lastly, the eSafety Guide on the eSafety Commissioner's official website, last updated on 18 September, 2025, describes Snapchat as "a messaging app that lets you send images, videos or instant text messages to friends."⁷ That is exactly how young Australians overwhelmingly use it.

As a platform with meaningful reach among Australian teens, we take our responsibility to protect young people online seriously. We recognize that bullying and misuse of Snapchat has sadly occurred in Australia, and we have worked tirelessly to keep our platform safe for our community. While we know that Snapchat is not perfect, and we cannot eliminate every risk,

³ Private Snapchat user research conducted by Freshwater Strategy, September 2025.

⁴ [Explanatory Statement](#) to the Online Safety (Age-Restricted Social Media Platforms) Rules 2025, p.8.

⁵ [Reach Out, Beyond Blue and the Black Dog Institute](#), 2024, p. 11.

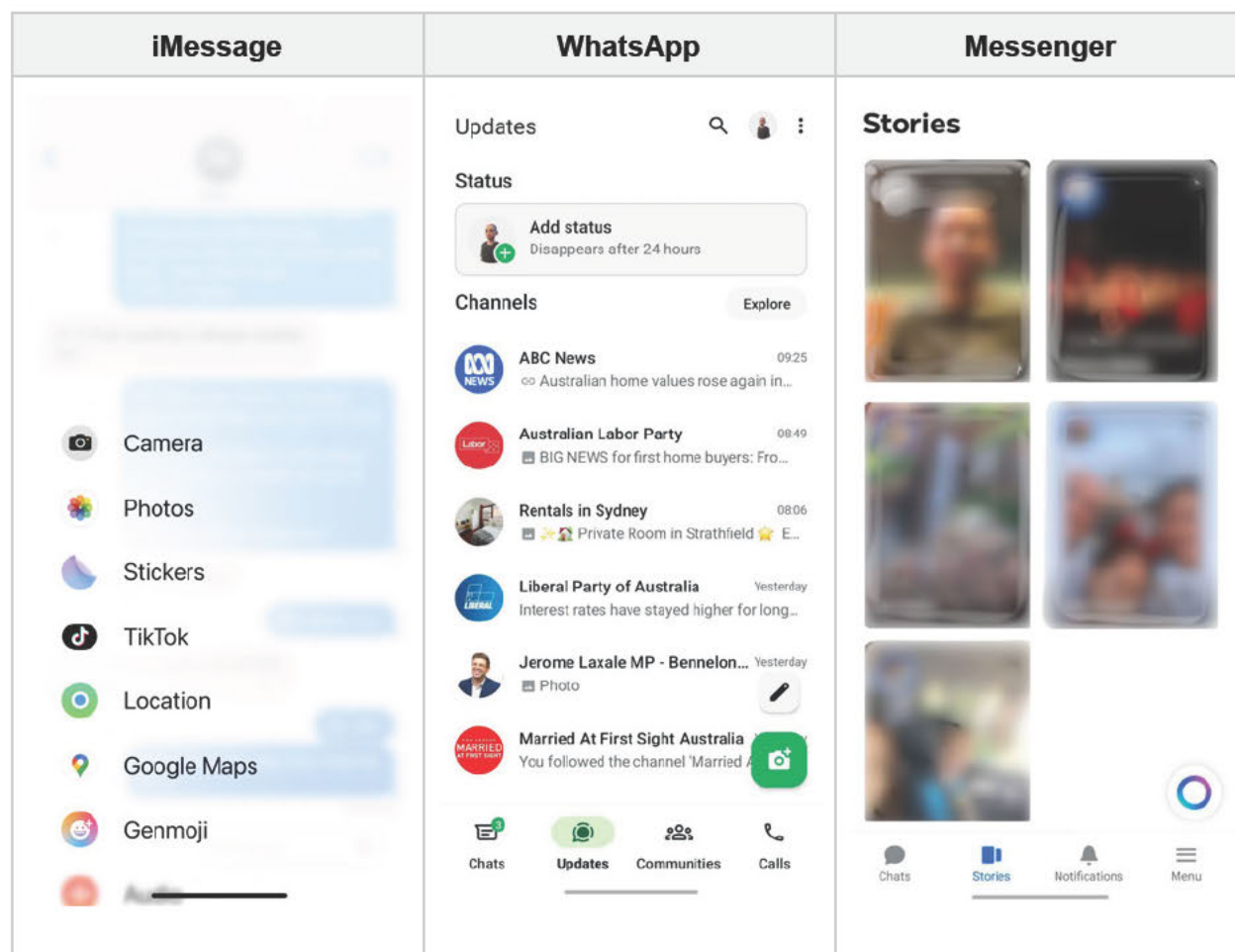
⁶ [Explanatory Statement](#) to the Online Safety (Age-Restricted Social Media Platforms) Rules 2025, p.15.

⁷ [The eSafety Guide: Snapchat](#).

Snapchat provides many safety features including comprehensive in-app reporting, [parental tools](#), and [safeguards against unwanted contact](#).

We have also designed Snapchat to require two people to add each other before communicating, unlike most commonly used messaging services. We maintain 24/7 safety and law-enforcement operations in Australia to proactively detect inappropriate content and behavior and respond quickly to user reports. We also participate in the Take it Down, Report Remove and StopNCII programs that assist victims in curbing the spread of their images on our service. These are just some examples of the way we have worked to make Snapchat safer than other messaging services, including text messaging, which does not provide any of the aforementioned safety measures.

If Snapchat is considered in scope as an age-restricted social media platform, we anticipate that services such as WhatsApp, iMessage, and Messenger, each of which also offers ancillary services like location sharing or broadcast sharing in addition to messaging, would be deemed similarly in scope after a fair and consistent application of the Rules. An even-handed approach will help build trust and confidence in the framework and ensure that dominant players abide by the same rules as everyone else.



Regardless of the outcome, we will continue engaging regularly with your office, share supporting evidence for your assessment, and prepare sensible contingencies in good faith. We will also ensure that our planning aligns with the SMMA's privacy protections. We believe that an objective evaluation of Snapchat's primary purpose of enabling communication through messaging, email, voice calling, or video calling under paragraph 63C(6)(b) of the Act and paragraph 5(1)(a) of the 2025 Rules demonstrates that Snapchat is not an age-restricted social media platform.

Thank you again for the opportunity to work together. I know we share the same goal: helping young Australians stay safe online—and doing so in a way that is fair, transparent, and beneficial to Australian families. Please let us know if any further information would be useful in making your determination.

With appreciation,

s 47F



From: s 47F @tiktok.com>
Sent: Thursday, 2 October 2025 8:20 PM
To: s 47E(d)
Cc: s 22 ; s 47F ; s 22 ; s 22
Subject: Re: [External] RE: Proprietary and confidential - ARSMP self assessment guidance [SEC=OFFICIAL]

Categories: s 22 CRM update

Proprietary and Strictly Confidential

Hi s 22

Thank you for your email. We appreciate the team taking the time to consider our questions. Confirming that extending our planned 10am meeting on Tuesday next week to discuss this topic would be great, thank you.

We note and appreciate your comments regarding eSafety being unable to provide legal advice, and that eSafety will continue to assess any new services or changes to existing services, as and when they occur.

Apologies, we had confirmed verbally in earlier meetings, but now confirm in writing, s 47G(1)(b) As outlined, it is our intention to change the Terms of Service by 10 December to require users to be 16 years old or above in order to create or maintain an account on the current TikTok service. We also intend to implement several additional measures to ensure compliance with our obligations under the SMMA.

For completeness, we confirm that s 47G(1)(b)

We look forward to discussing this further next week. (Enjoy the long weekend!)

Kind regards

s 47F



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From: s 47E(d) @eSafety.gov.au>
Date: Thu, Oct 2, 2025, 5:07 PM
Subject: [External] RE: Proprietary and confidential - ARSMP self assessment guidance [SEC=OFFICIAL]
To: s 47F @tiktok.com>
Cc: s 22 @eSafety.gov.au>, s 47E(d) @eSafety.gov.au>, s 47F @tiktok.com>, s 22 @eSafety.gov.au>, s 22 @eSafety.gov.au>

OFFICIAL

Hi s 47F

Thank you for sending these questions through.

We require some time to consider and will be in a better position to have a productive discussion next week. Please confirm if you would like us to extend the 10am meeting next Tuesday to accommodate a discussion on this topic.

However, we want to be clear that eSafety is unable to provide legal advice in relation to TikTok's proposal regarding under 16 end-users, and it is a matter for TikTok to obtain its own legal advice.

As previously discussed, our focus is on assessing the existing TikTok service, and ensuring that existing services which are captured by the SMMA obligation are compliant by 10 December. eSafety will then continuously consider relevant changes to services as they occur, and the introduction of new services, in order to assess whether they are age-restricted social media platforms.

Based on our discussions to date, s 47G(1)(b)

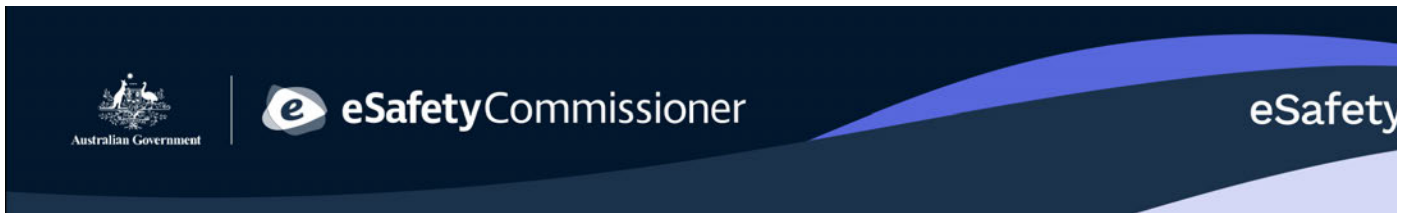
We note that TikTok has not provided any information in response to the Commissioner's correspondence dated 15 August which requested any information relevant to the eSafety's assessment by 29 August. eSafety will be sending TikTok our preliminary assessment of the TikTok service shortly.

Regards

s 22

Industry Compliance and Enforcement Branch

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, present and future.

From: s 47F <[@tiktok.com](mailto:s 47F)>
Sent: Tuesday, 30 September 2025 9:45 PM
To: s 22 <[@eSafety.gov.au](mailto:s 22)>
Cc: s 22 <[@esafety.gov.au](mailto:s 22)>; s 22 <[@eSafety.gov.au](mailto:s 22)>; s 47E(d) <[@eSafety.gov.au](mailto:s 47E(d))>; s 47F <[@tiktok.com](mailto:s 47F)>
Subject: Proprietary and confidential - ARSMP self assessment guidance

Proprietary and Strictly Confidential

Dear s 22

Thank you to you and the team for meeting with us yesterday to discuss the application of eSafety's [assessment guidance](#)s 47G(1)(b). We are arranging a follow-up meeting, but given the tight timelines, we wanted to raise a few critical questions so that eSafety has time to consider them ahead of our next meeting.

s 47G(1)(b)

- | [REDACTED]
- | [REDACTED]
- | [REDACTED]
- | [REDACTED]
- | [REDACTED]

To fully understand eSafety's concerns, it would be helpful if eSafety could clarify the following on our next call:

1. s 47G(1)(b) [REDACTED]
2. s 47G(1)(b) [REDACTED]
3. Why a service being provided via a separate app is critical to the analysis, and how this form of separation (as opposed to substantive differences in terms, functionality and purpose) results in a safer experience for users?
4. What does "operationally and administratively separate" mean in practice? For instance, is eSafety suggesting that services need to be operated by different entities? Can there be overlap in global resources such as engineering or trust and safety professionals? Etc.
5. In respect of each of the above, the basis for eSafety's position, noting there is no guidance in the *Online Safety Act 2021* (Cth) or extrinsic materials on what constitutes a *single* or *separate* electronic service.

s 47G(1)(b)

s 47G(1)(b)

We look forward to discussing in our next call.

Kind regards

s 47F



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