

Ministerial Submission:

Social Media Minimum Age Compliance Update

To	The Hon. Anika Wells MP, Minister for Communications
Cc	<p>s 22 [redacted] Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCA)</p> <p>s 22 [redacted] Communications and Media, DITRDCA</p> <p>s 22 [redacted] Digital Platforms, Safety and Classification Division, DITRDCA</p> <p>s 22 [redacted] Online Safety Branch, DITRDCA</p> <p>s 22 [redacted] Communications Policy</p>
From	Julie Inman Grant, eSafety Commissioner
Date	14 January 2026
Subject	Social Media Minimum Age compliance update
For	Noting
Timely/Critical Date	To inform preparations for 16 January 2026 press conference.

Disclosure of Information under the Online Safety Act

This briefing includes summaries and aggregate data derived from information obtained through compulsory notices under section 63G of the Online Safety Act (the Act).

The information in this briefing is provided to you on a strictly confidential basis as it includes a variety of information which may be confidential, privileged or subject to other restrictions and as such is must not be disclosed publicly or further used or distributed.

In deciding to disclose these insights to you and the Department under sections 208 and 209 of the Act, I have considered the confidential nature of the notices and submissions made to me by providers in relation to the confidentiality of certain information. As a result, and consistent with eSafety's correspondence with providers, this briefing does not include figures specific to individual platforms, except where providers have chosen to make this information publicly available.

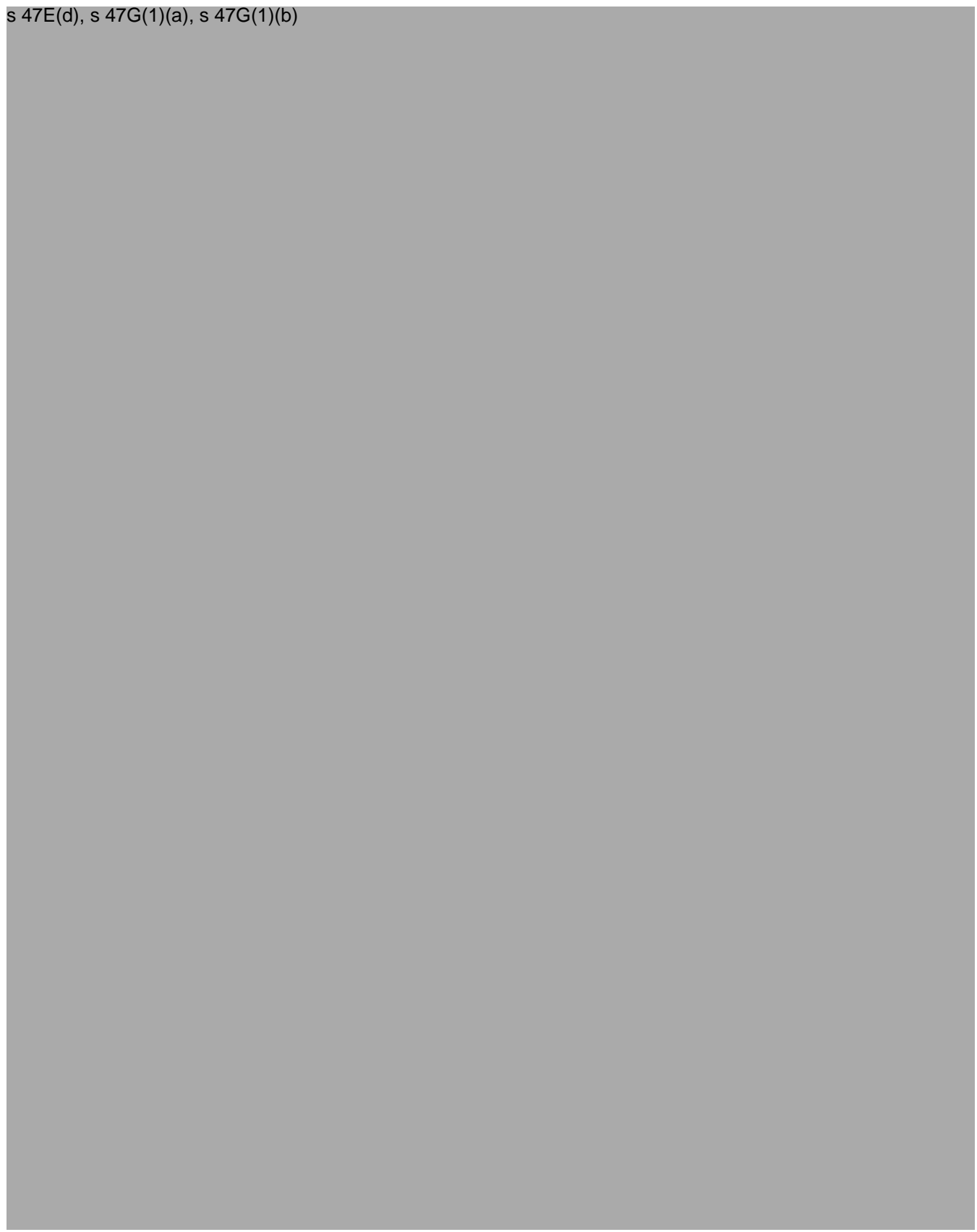
Before any disclosure of information from these and future notices to the public, I must first consult with the providers of the platforms.

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







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

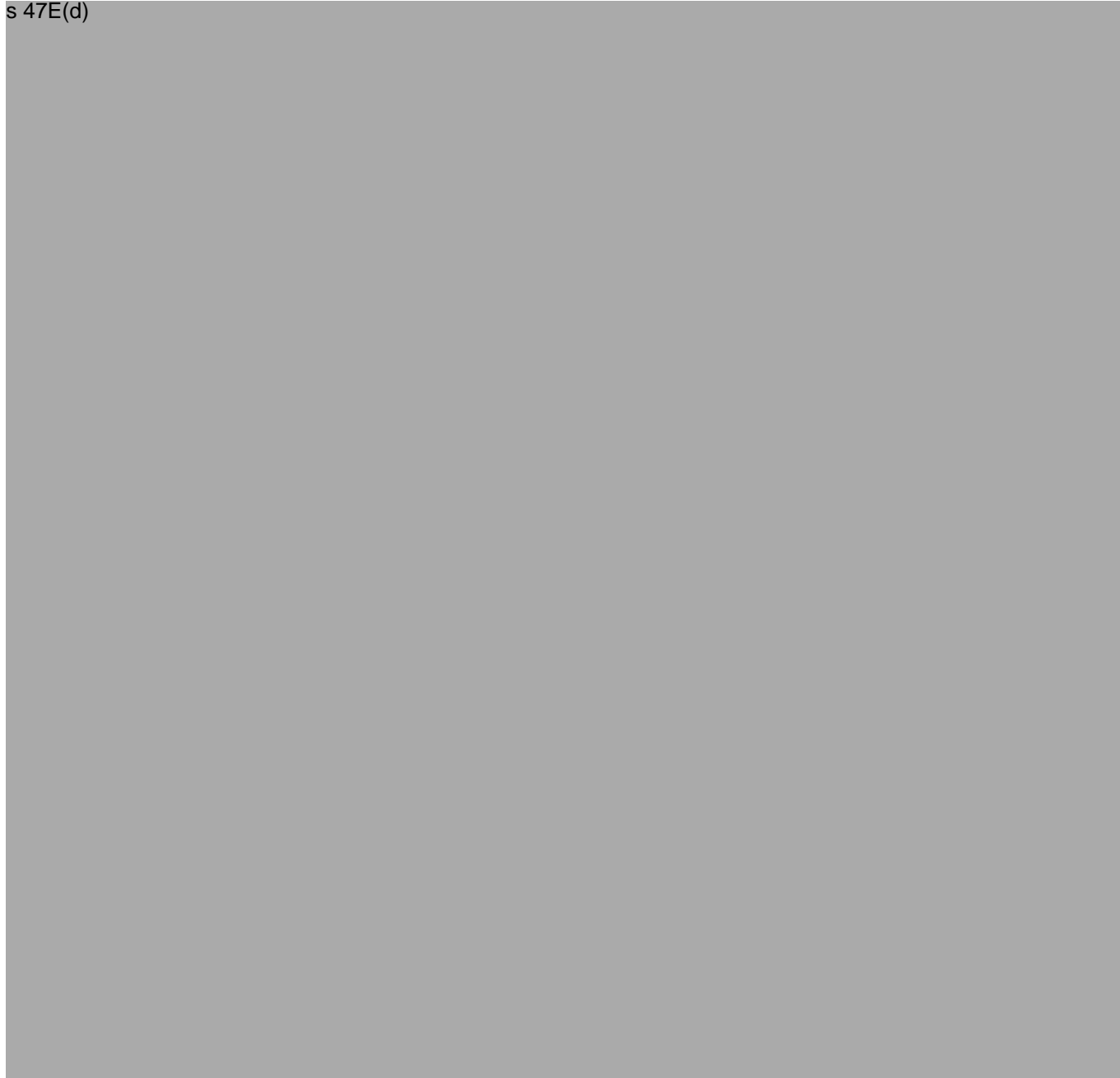


s 47E(d), s 47G(1)(a), s 47G(1)(b)



s 47E(d)





Migration Trends

eSafety is monitoring potential migration trends by accessing app download data from Google Play and the Apple App Store in Australia. Limitations of this data are that it does not reflect usage of an app or the age of the user, however it gives early indicators if an app is rising in popularity.

Pre 10 December 2025, large ARSMPs such as Snap, Facebook, Instagram, Tik Tok and YouTube had weekly downloads of over 10,000, with some reaching over 25,000.

After 10 December, the volume of apps being downloaded surged across these ARSMP platforms for 1-2 weeks (except YouTube) then reduced back down. During this time, we

also saw similar increased download volumes for smaller services such as Capcut, Lemon8, Pinterest and Roblox, however all then reduced over the following weeks.

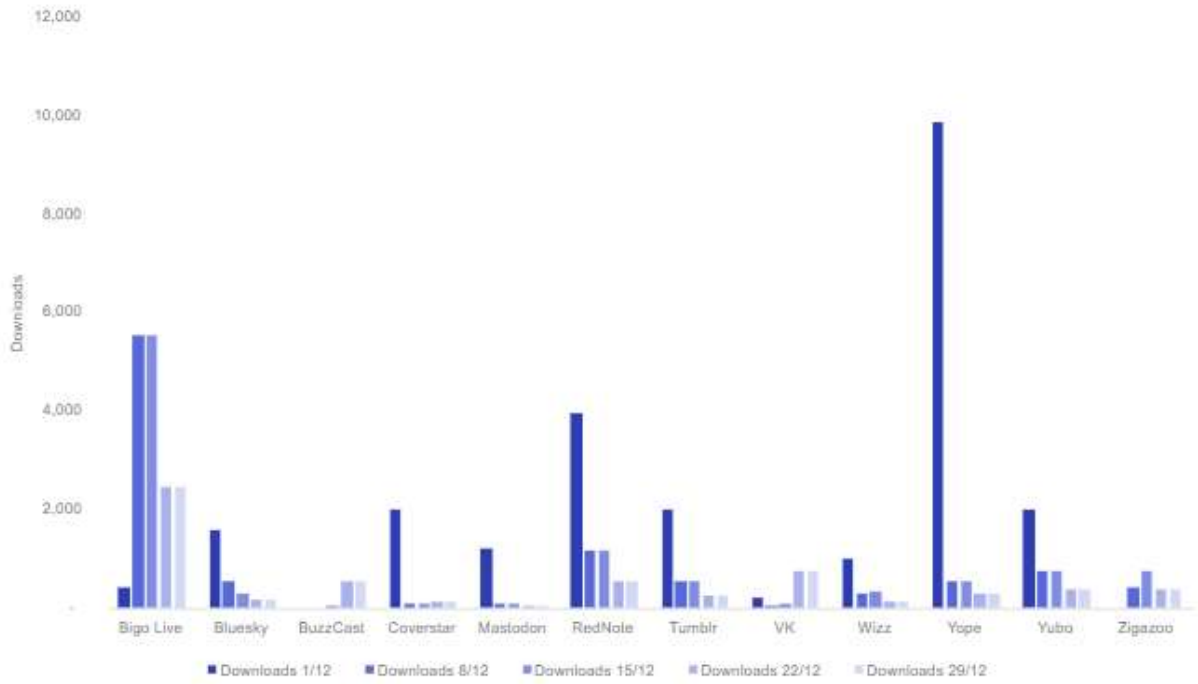
Capcut and Lemon8 remain popular, while Discord's downloads have steadily declined through December. Pinterest and Roblox, on the other hand, have shown overall growth during the month.

eSafety has engaged with Bytedance, the parent company of Capcut and Lemon8. They have self-assessed Capcut as a non-ARSMP, and Lemon8 as an ARSMP, who they state will comply with their regulatory obligations. eSafety are scheduled to meet with Lemon8 this month to understand the steps they are taking to comply with regulatory obligations under the SMMA. We are aware Lemon8 does have age assurance measures in place at account creation stage.

eSafety is monitoring emerging apps, considering them to be those below 10,000 downloads per week. A number of these have been reported in the media as they saw a spike in downloads around 10 December which raised their 'app ranking' for that week. As can be seen in the graph below, Apps such as Yope, Coverstar, BigoTV, Rednote and Zigazoo have seen considerable reductions in downloads and sit well below those large ARSMPs listed on the eSafety website. For example, Bluesky was downloaded 1,571 times in the first week of December, and only 136 times the last 2 weeks of December.

eSafety met with Bluesky on 7 October 2025, during which Bluesky confirmed they have self-assessed as an ARSMP and outlined their compliance plan. Bluesky has information on their platform to inform users that they are using Kids Web Services (KWS) as their age assurance vendor.

AU Downloads December 2025- Emerging downloaded social media apps



s 47E(d)




Next Steps

s 47E(d)



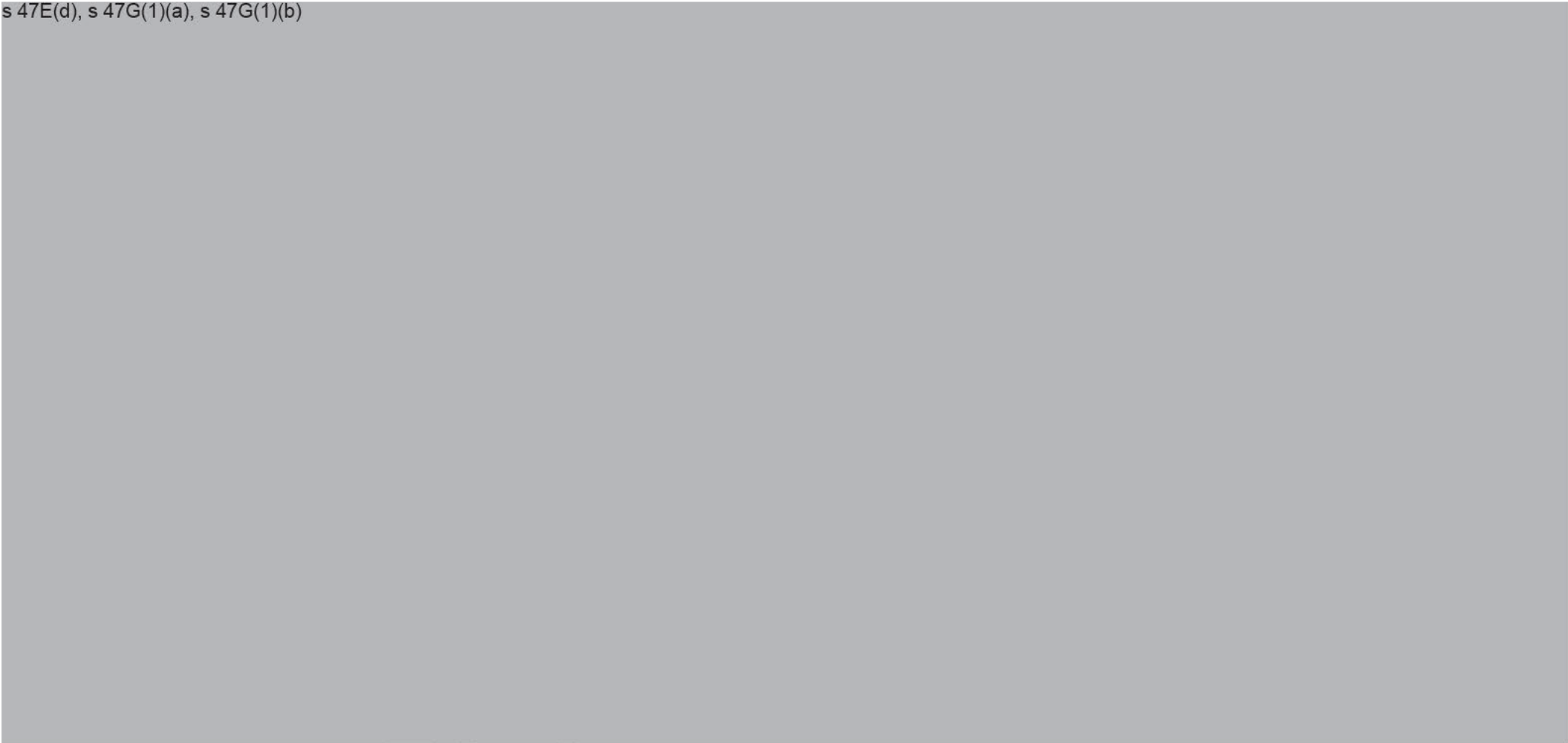
s 47E(d)



- eSafety will continue to develop and update the resources available on eSafety.gov.au to provide families and the public with education and information.
- My team will keep your Office updated on progress through regular weekly meetings and I will provide a written update at the next inflexion point when the platform responses to the second tranche of notices has been received and analysed, and our compliance assessments have progressed.
- Our next public update on SMMA will be related to our evaluation. It will coincide with the release of the evaluation research instrument on the Open Science Framework in February, which outlines the study and what information will be captured and analysed. A detailed brief on the evaluation has been provided to your Office. We will provide your Office visibility of this statement and information soon.

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



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2025 – 2026 Additional Estimates – February 2026

Environment and Communications

7: KEY ISSUES BRIEF: Social Media Minimum Age (SMMA)

Talking Points

- Social media companies removed access to about 4.7 million accounts identified as belonging to children under 16 within the first half of December to comply with Australia's social media minimum age.
- eSafety continues to engage with the major social media platforms to monitor and assess compliance. We are looking at systemic compliance, not individual instances of accounts.
- The process of age assurance requires time to complete fairly and accurately, but early indications are that platforms are making meaningful attempts to prevent under-16s from holding accounts.
- eSafety is taking a proportionate and risk-based approach, focusing on services with the greatest number of children, where there are higher risks of harm.

Key Issues

- The SMMA obligation requires age-restricted social media platforms to take reasonable steps to prevent Australian children under 16 from having accounts on their platforms. The obligation is on platforms, not children or their parents or carers.
- As our regulatory guidance makes clear, the social media minimum age (SMMA) obligation is about having appropriate and effective systems and processes in place, not individual instances of accounts.
- eSafety is taking a proportionate and risk-based approach, focusing on services with the greatest number of users, where there are higher risks of harm, and the steps companies are taking to prevent the youngest users from having accounts.
- Overall, early indications are that platforms are making meaningful attempts to prevent under-16s from having accounts.
- While the SMMA obligation is not a complaints-based scheme, eSafety has a SMMA form on our website through which the public can provide information to eSafety about platform implementation and compliance with the obligation.
- eSafety is monitoring migratory patterns of social media use by children under the age of 16 and will adjust its regulatory focus as needed to ensure age-restricted social media platforms operating in Australia are complying with their obligations.

Background

Regulatory guidance

- Consistent with other international approaches, eSafety has taken a **principles-based** approach. Reasonable steps should respect and protect fundamental human rights and be:
 - **Reliable, accurate, robust and effective**
 - **Privacy-preserving and data-minimising**

- **Accessible, inclusive and fair**
- **Transparent**
- **Proportionate**
- **Evidence-based and responsive to emerging technology and risk.**
- We expect age-restricted platforms take steps to:
 - **find** accounts held by under-16s, **and deactivate/remove** those accounts with kindness
 - **prevent** under-16s from opening **new accounts**
 - **prevent workarounds** that may allow under-16s to bypass the restrictions
 - have **processes to review** decisions and correct errors, so no one is removed unfairly
 - **provide accessible and clear ways for people to report** underage accounts.
- eSafety has encouraged providers to take a **layered approach**
 - Depending on the platform and userbase, this could involve a range of methods for estimating or inferring age at sign up, and then only requiring more information when there is a signal they are under 16, e.g. if they are reported by another user.
 - Steps reflect platforms' circumstances; no specific form of age assurance is required.

Assessing compliance

- We are considering a range of insights to monitor platforms' compliance.
- eSafety has information-gathering powers to require age-restricted social media platforms to give **any information** relevant to their compliance with the SMMA obligation.
- An age-restricted social media platform must comply with an information-gathering notice to the extent that they are capable of doing so. Non-compliance may result in enforcement action taken and subject to civil penalty of up to \$825,000 for each contravention.
- We will be as transparent as possible, however eSafety will not be publishing specific numbers or detailed information obtained using our information-gathering powers, to maintain the integrity of investigations and ensure any potential enforcement action is not compromised.
- While the SMMA is not a complaints-based scheme, eSafety has provided an SMMA online form through which the public can provide information to eSafety about platform implementation and compliance with the obligation. We also have a 'contact us' form that the public can use for enquiries. From **10 December 25 to 20 January 26**, we have received **123 SMMA form submissions** and **380 enquiries**, ranging from broad support of the SMMA, to concerns about accounts not being removed, as well as concerns about the policy in general.

Difficult Questions

If asked whether specific platforms are complying/potential compliance action

- We are considering a range of insights to assess platforms' compliance, including information received in response to information-gathering notices, submissions from members of the public, and engagement with a range of stakeholders, including discussions with age assurance providers and the platforms themselves.
- Our regulatory guidance outlines some examples of the types of information we can require platforms to provide us. This includes information about the tools and technologies the platforms are using, and how many accounts have been actioned since 10 December.

If asked about reports of circumvention

- This is something we are actively considering
- As our regulatory guidance makes clear, the SMMA obligation is about **having appropriate and effective systems and processes** in place, **not individual instances of accounts**.
- The process of age assurance can require time to complete fairly and accurately.
- Many platforms already use age-inference models; a user might pass initial age checks but should later be detected if there is a signal they are under-16.

- We continue to make clear our expectation that platforms continuously improve their efforts to detect and deactivate under-16 accounts.

If asked about migration to other services

- eSafety is monitoring migratory patterns of social media use by children under the age of 16 and will adjust its regulatory focus as needed to ensure age-restricted social media platforms operating in Australia are complying with their obligations.
- We are aware there have been increases in downloads of some emerging apps, for example, Lemon8, Yope and Coverstar. We are monitoring this over time to stay alert to any significant migration of under 16s to new platforms. To date there is no indication this is occurring.
- We did expect this would happen and we continue to engage with platforms to ensure they are meeting their regulatory obligations. We have been engaging with companies located across the world, including France, Singapore and China to encourage platforms to self-assess whether they meet the definition of an age-restricted social media platform and to monitor for migration trends.

If asked why GenAI platforms/other platforms aren't included

- The definition of an age-restricted social media platform is outlined in the Online Safety Act.
- eSafety has provided guidance to platforms to support them to assess whether they might meet the definition of an age-restricted social media platform and are required to comply with the SMMA.
- In the lead up to the SMMA taking effect, eSafety published information on preliminary assessments of a range of online services against the definition of 'age-restricted social media platform' to provide clarity to the public about which services we believe are subject to the SMMA obligation.
- Given the sheer number of online services and the way they are constantly changing, it is not possible for eSafety to maintain an exhaustive list of all services which meet the conditions for age-restricted social media platform at any given time. The onus is on providers who offer services in Australia to assess for themselves whether they meet the conditions, and if so, to comply.
- eSafety has engaged with a wide range of services beyond those listed on our website, and a number of services have assessed that they are covered by the SMMA, including BlueSky, Lemon8, Wizz and Yubo.
- Importantly, eSafety does not have an ability to formally determine whether a service is subject to the SMMA obligation. Rather, eSafety will conduct an assessment of a service when we are considering regulatory action, such as giving an information-gathering notice. If a service disagrees with eSafety's assessment and chooses not to comply with a notice or the SMMA obligation, it will ultimately be a matter for the courts to determine.
- The SMMA is just one of many measures designed to encourage greater transparency and accountability, prevent online risks, and limit harm – especially for children.

If asked about users 16 and over being removed

- We expect that platforms implement measures to comply with the SMMA object in an empathetic and transparent way, communicating clearly with their users about any actions taken on their account, and providing them with ways to access and save their information.
- Our guidance to industry includes an expectation that platforms provide accessible review mechanisms for users who believe they've been wrongly flagged as under 16.
- We understand where there may be instances where platforms initially get it wrong – however we expect that platforms are treating their users with care and fairness.

If asked about the High Court challenge

- Reddit is exercising its democratic right to challenge these laws.
- We will continue to implement this legislation and assess compliance.
- Notwithstanding the legal challenge, Reddit is engaging with eSafety cooperatively on compliance.

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January 2026 Social Media Minimum Age Implementation Update for the Minister



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Top headlines for the month

- **Media and international interest:** On 16 January, eSafety published a [compliance update](#) regarding SMMA implementation. The media engagement delivered key coverage in mainstream and industry press, with ongoing international media and stakeholder queries underway.
- **Public reporting:** SMMA form submissions and enquiries indicate concerns about under 16s remaining on platforms, even after being reported. These alongside other insights are helping to shape our engagement with platforms, particularly the questions in our information-gathering notices.
- **Information-gathering:** s 47E(d)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
- **Evaluation:** Baseline data collection has been completed.

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Stakeholder engagement

In January, we met with...

Industry:

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

Age assurance providers to enhance our understanding and feed into our information-gathering notices.

- Persona (Reddit, X)
- Yoti (Instagram, Facebook, TikTok)
- k-ID (Snap, Kick)

Services self-assessing as ARSMPs to explain our expectations and hear how they will comply before considering how we communicate this on our website.

- [Lemon8](#)
- [BigoLive](#)
- [Yubo](#)

Other stakeholders:

Representatives of international governments with an interest in the SMMA

- Embassy of Israel
- Royal Norwegian Embassy
- United Kingdom High Commission
- New Zealand Government

Mental health orgs as needed including with [KHL following the release of this article](#). We confirmed this reporting was not accurate and no significant spikes or concerns have been raised. Teams will commence regular info sharing meetings with mental health orgs from Feb.


In coming months we will...

- resume regular 'industry supervision' meetings with priority ARSMPs (from Feb)
- be seeking education insights (once term 1 is underway).




2026 Industry Supervision Meetings

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



Supervision is a form of regular, proactive industry engagement that is focused on a platform's activities related to their regulatory obligations. It takes the form of regular direct communication with a regulated entity to discuss risks and mitigation options, and share information, insights or resources to support corrective action.



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Regulatory investigations



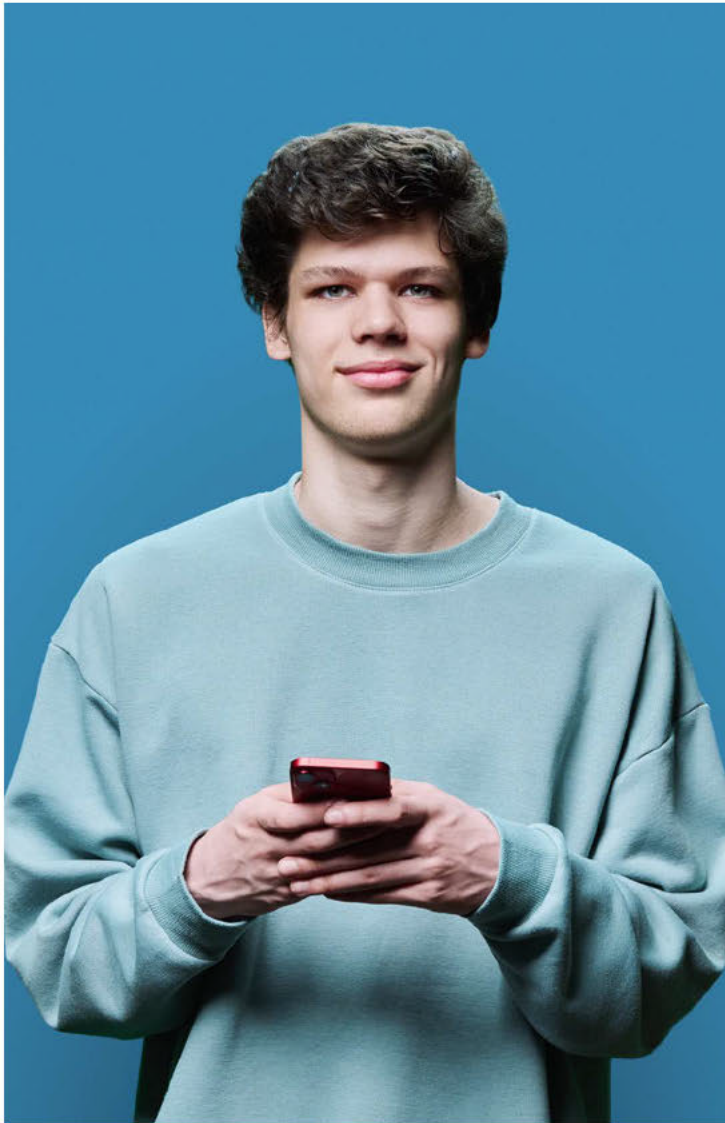
s 47E(d), s 47G(1)(b)



s 47E(d)

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

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Submissions and enquiries from the public

- Common themes raised in [SMMA form submissions](#) and [general enquiries](#) about SMMA centred on two issues:

Theme 1

Concerns about under 16s still on platforms (Snapchat, TikTok, Instagram)

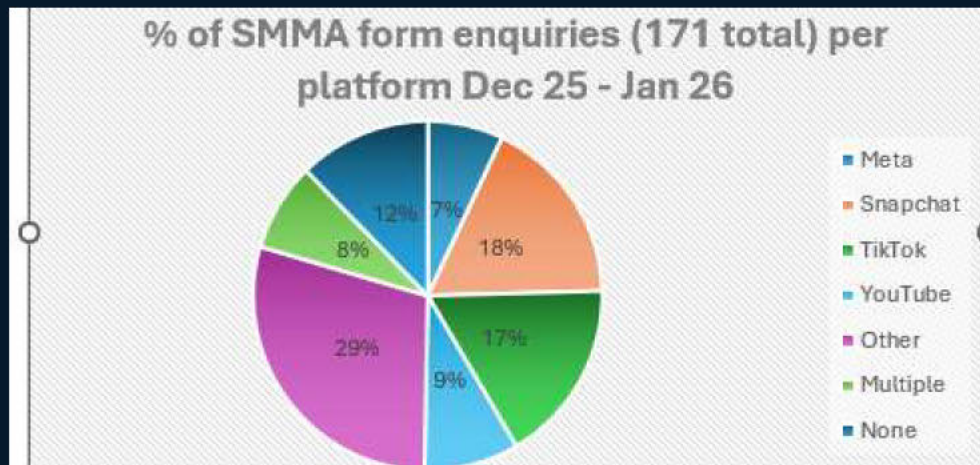
Theme 2

Concerns over perceived inaction from platforms when reporting under-16s

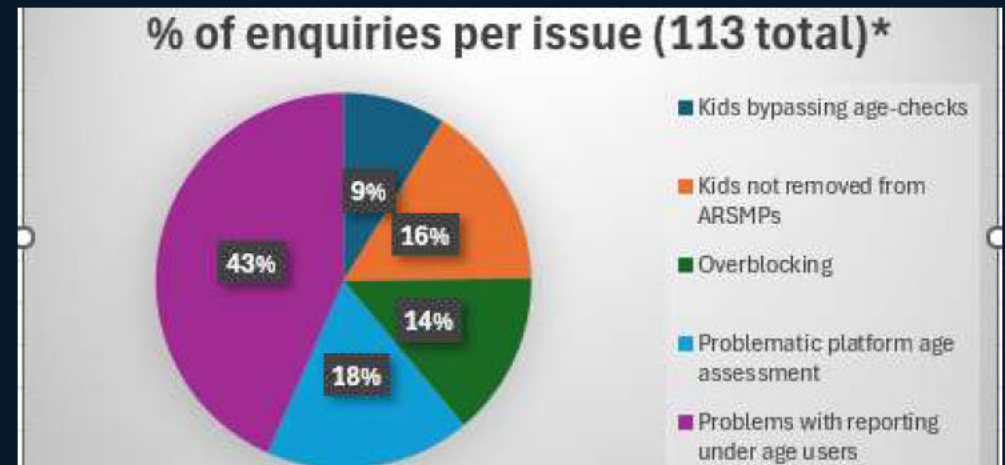
These insights will continue to feed into our discussions with platforms, our formal information-gathering processes and our broader compliance monitoring.

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SMMA Form Submissions Breakdown



Snapchat is the platform that features most commonly in submissions from the public, though the spread is fairly even between the platforms listed.



The most prevalent issue from parents was dissatisfaction by the perceived lack of action by platforms when reporting their under-age kids' accounts.

*excludes generic feedback/queries, e.g. don't support the ban

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Media reporting

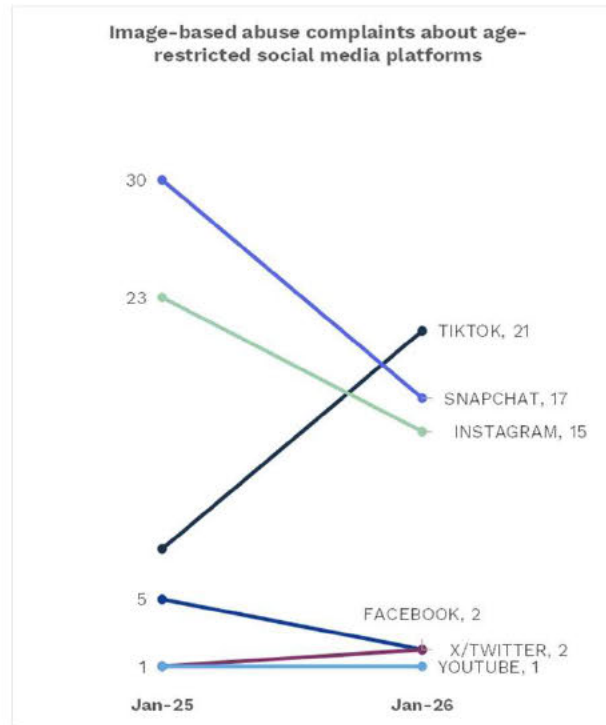
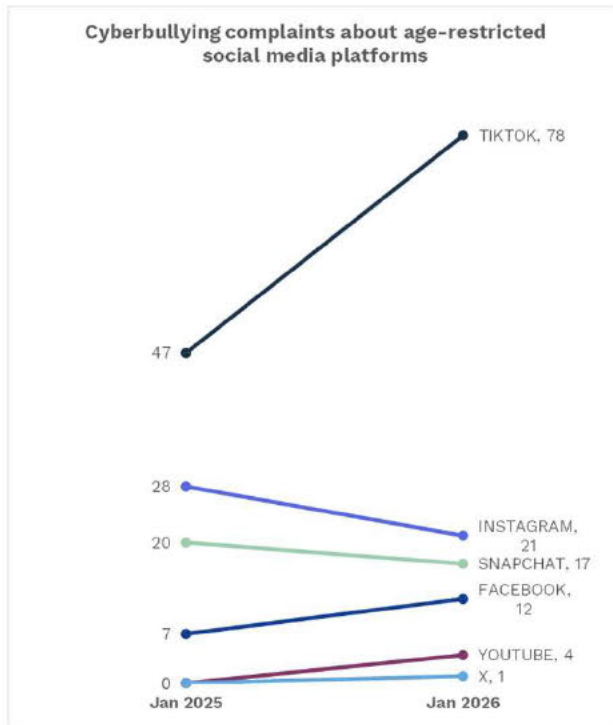
In January, stories of interest included...

These insights will feed into our discussions with platforms, our formal information-gathering processes and our broader compliance monitoring.

- Book stores reporting sale boom following the social media delay – Gold Coast Bulletin
- Positive coverage following mid-Jan compliance update (ABC and The Guardian)
- Coverage on how some teens are circumventing the social media delay (AFR, SMH)
- Concerns raised on compliance by some providers eg Snapchat (AFR , WA Today)
- International coverage (Sunday Times, BBC World)

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Data from complaint schemes - u16 Cyberbullying and Image-Based Abuse



	Total Jan 2026 complaints	Involving age-restricted social media platforms
Cyberbullying	151 (+32% YoY*)	120 (+26% YoY)
Image-based abuse	100 (+96% YoY)	68 (+17% YoY)

*Year on year comparison – Jan 2025 vs Jan 2026

Compared to January 2025 we have seen:

- an increase in child cyberbullying and imaged based abuse complaints on *TikTok & Facebook* compared to the same period last year.
- reports made about other ARSMP are trending downwards.

These insights will feed into our broader work.

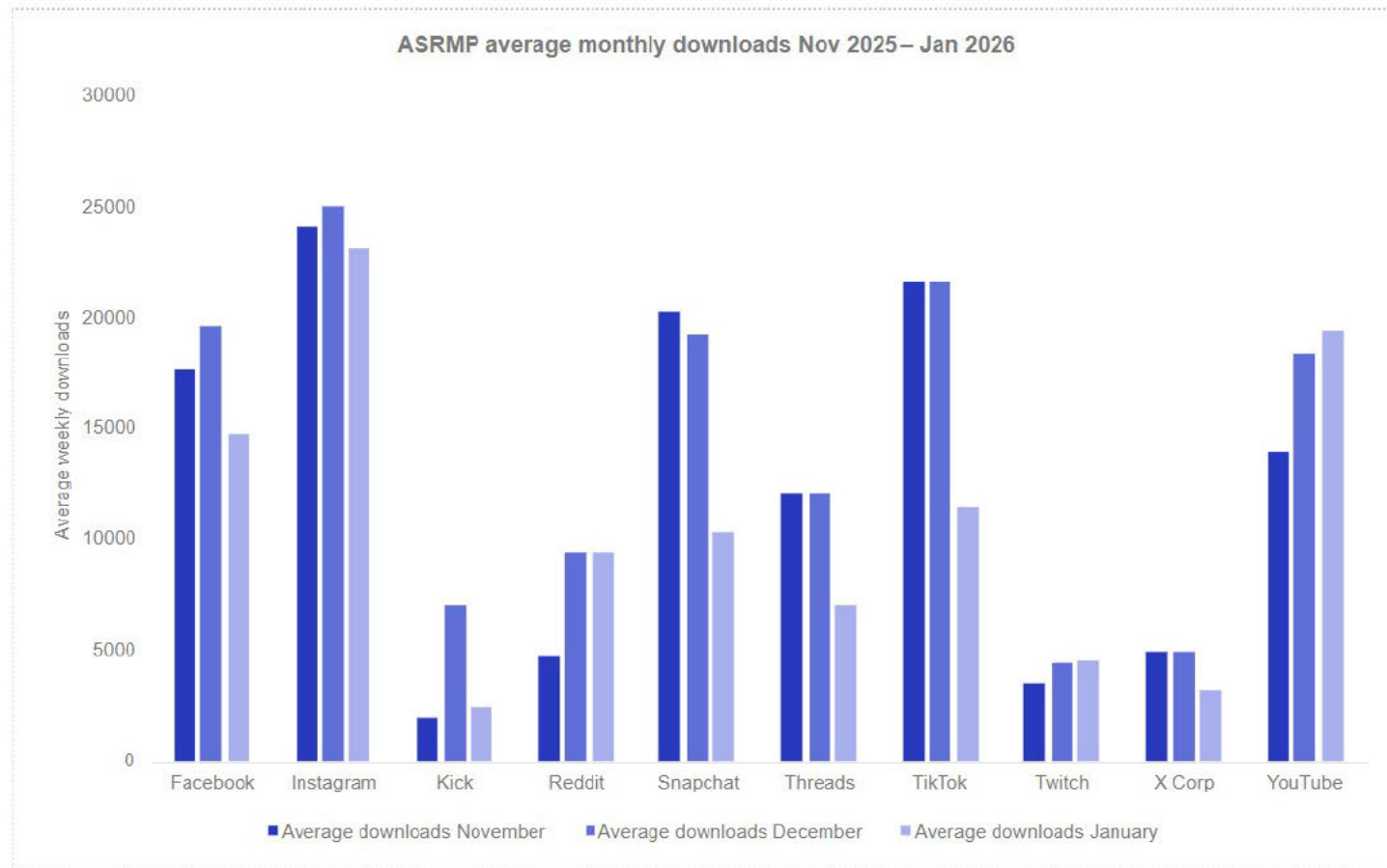
- eSafety continues to receive complaints from u16s involving ARSMPs.
- Complaints are also being submitted from parents that their child's account remains active.

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Market insights

This shows weekly app downloads for ARSMPs listed on eSafety's website, from 1 December to 19 January. All have fewer downloads in mid-January than they did in in December.

Monthly reporting on downloaded apps

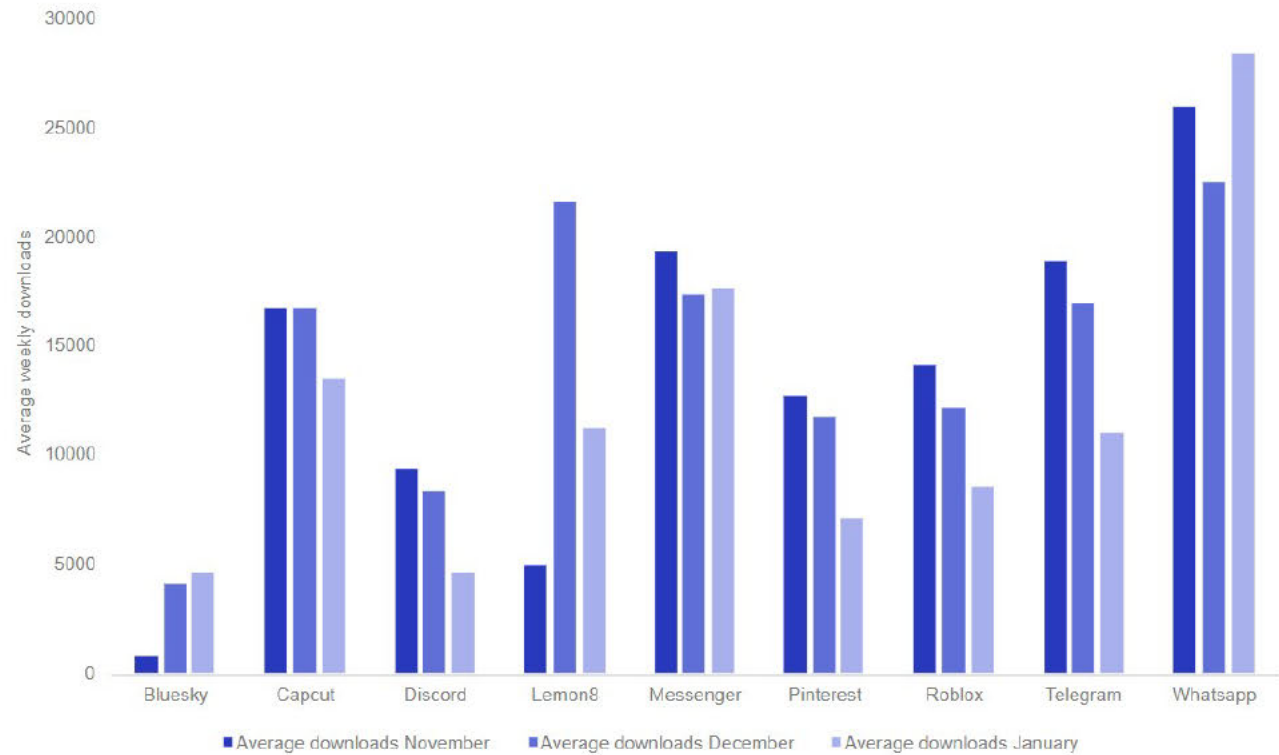


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Market insights

These are the other highly downloaded apps within Australia in January. Of these, Lemon8 has self-assessed as an ARSMP; others have not been assessed as ARSMPs. We see few platforms maintaining the increase in downloads they had in December, with Messenger and Whatsapp remaining steady.

Other highly downloaded app average monthly downloads Nov 2025– Jan 2026

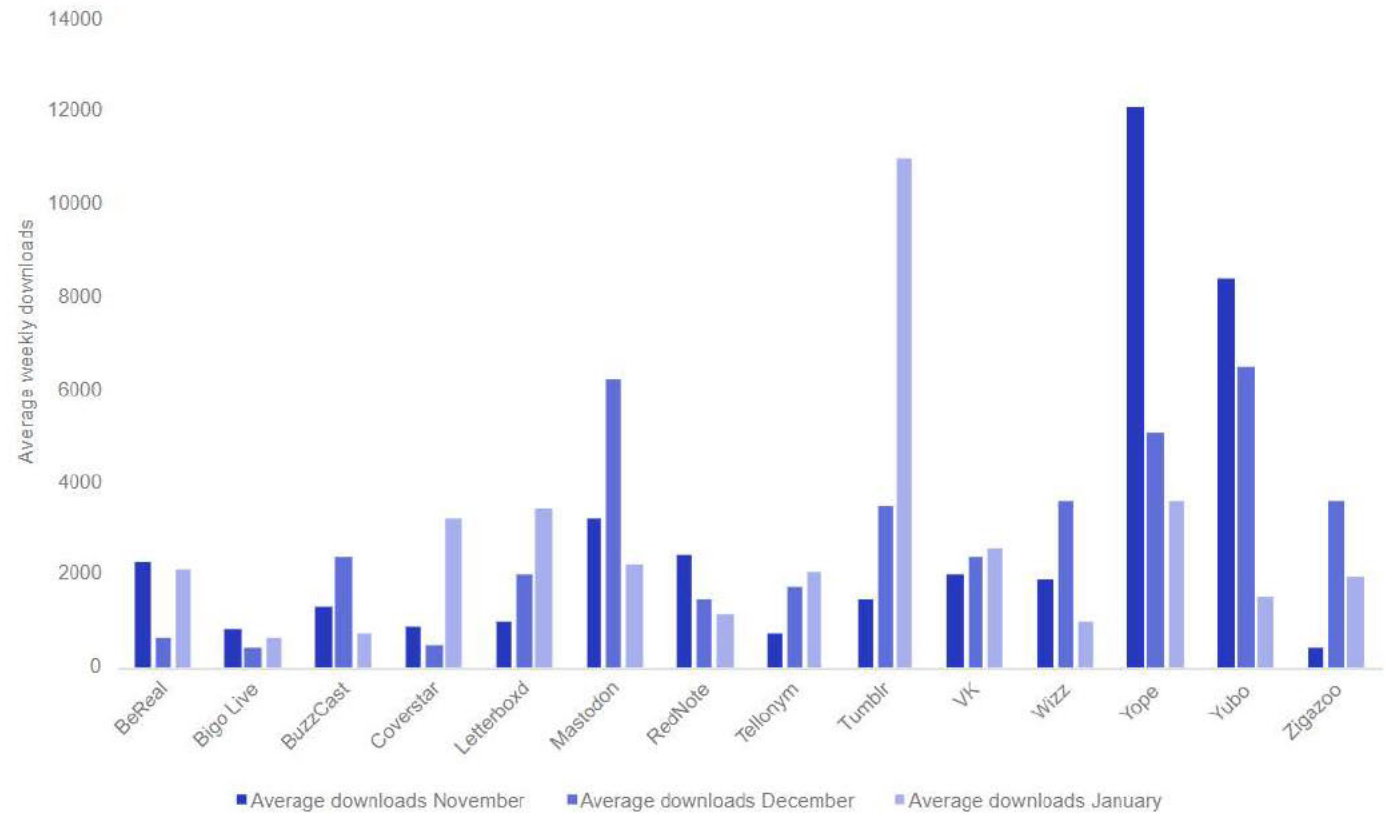


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Market insights

These are the other emerging apps, which average below 10,000 downloads per month in total within Australia. None show sustained and significant growth, but we will continue to monitor.

Emerging app average monthly downloads Nov 2025– Jan 2026



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eSafety research and evaluation

Evaluation
baseline data
collection has
been
completed.

- The study follows **4121 children and families** over **more than two years** using a range of complementary research methods, including:
 - surveys with children aged 10–16 and their parents
 - interviews and group discussions exploring lived experiences
 - opt-in, privacy-protected smartphone-use tracking, capturing high-level information only (such as app use, time spent and time of day)
 - analysis of linked population-level data, such as education and health outcomes.
- The data are currently being prepared for analysis. The second wave of evaluation data collection will go into the field in March 2026.
- A central repository with all relevant information about the evaluation will be published on our Social Media Age Restrictions Hub in Feb/March. The first 'immediate-term' data findings will be available in June/July, followed by a second report in Sep/October 2026 which will highlight findings from 6-months post implementation.
- *Separately*, data collection has been completed for a pulse survey of approximately 1000 parents examining experiences of social media account access post 10 December 2025. The data are currently being prepared for analysis.

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eSafety education and resources

- From November 2025 through January 2026, we have delivered **12 webinars to 4858 parents and carers, educators and youth-serving professionals**, with 5 more webinars scheduled over the coming weeks.
- The public information campaign delivered by DITRDCSA has made a considerable impact in overall website traffic to eSafety.gov.au. There has been around **95% increase in overall page views**, for the period of October 2025 to January 2026 (compared to the same period the year prior).

Top level website traffic

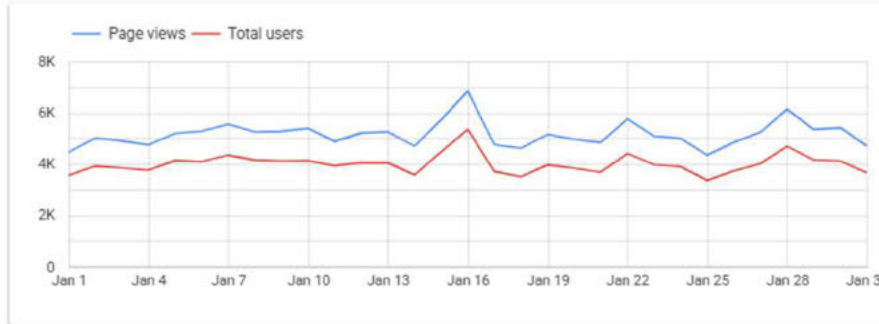
Period: 1-31 Jan 2026

Analytics for SMAR Campaign pages

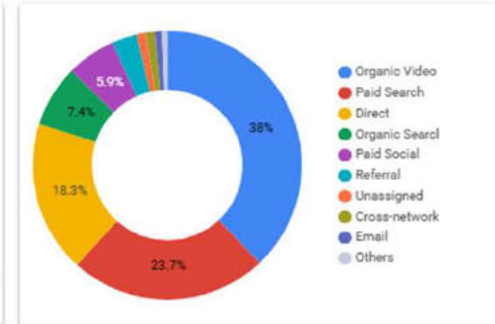
Total users
111,043
↑ 463.1% from previous year

Page views
159,636
↑ 434.3% from previous year

Performance over time



Performance by Traffic source



Top 10 webpages

Page path	Page views	Total users
1. / (home page)	130,954	91,747
2. /about-us/industry-regulation/social-media-age-restrictions-hub	25,538	20,347
3. /about-us/industry-regulation/social-media-age-restrictions/campaign	1,946	1,615
4. /about-us/industry-regulation/social-media-age-restrictions/campaign/simplified-chinese	776	743
5. /about-us/industry-regulation/social-media-age-restrictions/campaign/community-resources	99	78
6. /about-us/industry-regulation/social-media-age-restrictions/campaign/arabic	63	47
7. /about-us/industry-regulation/social-media-age-restrictions/campaign/dari	42	38
8. /about-us/industry-regulation/social-media-age-restrictions/campaign/nepali	35	36
9. /about-us/industry-regulation/social-media-age-restrictions/campaign/spanish	34	31
10. /about-us/industry-regulation/social-media-age-restrictions/campaign/punjabi	33	33

Top 10 downloads

File name	Page path	Downloads
1. Social-Media-Minimum-Age-Campaign-research-report-summary-Oct2025.pdf	/about-us/industry-regulation/social-media-age-restrictions/campaign	16
2. SMAR-FirstNations-StudentWorkbook.pdf	/about-us/industry-regulation/social-media-age-restrictions/campaign	15
3. Out-of-home-animations-for-the-good-of-their-wellbeing.zip	/about-us/industry-regulation/social-media-age-restrictions/campaign	13
4. SMAR-FirstNations-ParentHandbook.pdf	/about-us/industry-regulation/social-media-age-restrictions/campaign	12
5. SMMA-DigitalToolkit-FirstNations.pdf	/about-us/industry-regulation/social-media-age-restrictions/campaign	11
6. SMMA-OOH-10dec-ad2.pdf	/about-us/industry-regulation/social-media-age-restrictions/campaign	9
7. SMMA_Factsheet_ConversationGuide_SimplifiedChinese.pdf	/about-us/industry-regulation/social-media-age-restrictions/campaign/simplified-chinese	7
8. SMMA_OOH-10dec-ad1.pdf	/about-us/industry-regulation/social-media-age-restrictions/campaign	7
9. SMMA-Social-Media-Tiles.zip	/about-us/industry-regulation/social-media-age-restrictions/campaign/community-resources	6
10. SMMA_Factsheet_Digital.pdf	/about-us/industry-regulation/social-media-age-	6

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SMMA Monthly Migration Update Dec 2025 – Jan 2026



Key Takeaways

Seasonality shaped January activity

Potentially new devices obtained over the holiday period and digital-detox patterns lifted install and reinstall volumes in the app space, so January may need to be read as a seasonal snapshot rather than a long-term baseline.

December migration was temporary

Users likely tested alternatives during the Dec. 10 SMMA shift but largely returned to major, established platforms.

Only a few ASRMPs held the highs of December testing

Reddit, Twitch and YouTube stayed strong while most others dipped.

Emerging app spikes faded

Capcut downloads stayed high, but Lemon8 and Telegram fell back. Meanwhile, Tumblr lifted into SMMA-threshold territory, but it's unclear if this is seasonal or real change.

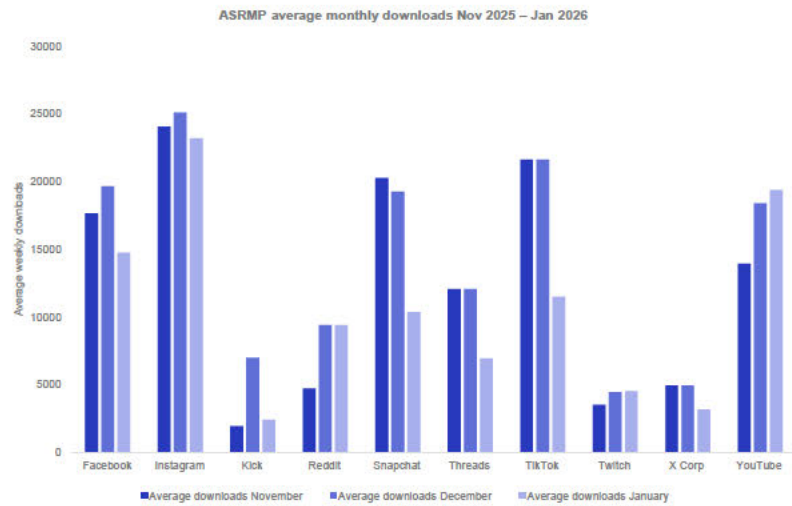
s 37(2)(b)

Source : SEMRush, SimilarWeb (1 Nov 2025 – 31 Jan 2026); AppTweak (2025)

Preliminarily-assessed ARSMP

Insights

- After December, many of the ARSMPs declined in weekly download volume except for Reddit, Twitch and YouTube.



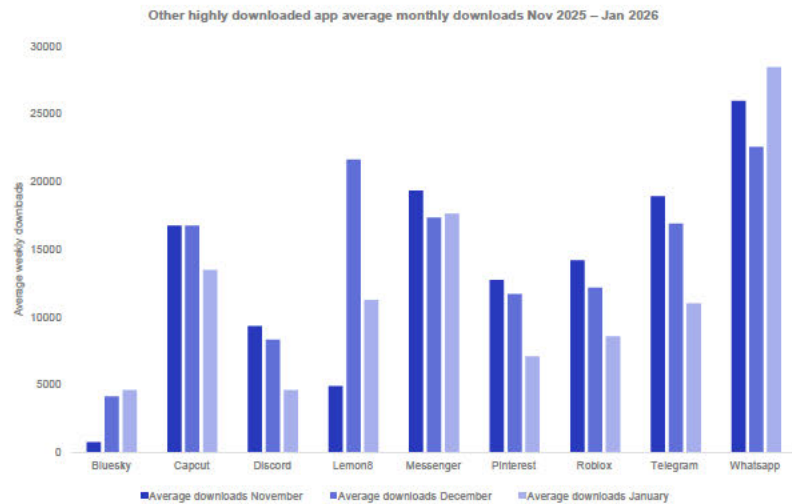
Source : SEMRush, SimilarWeb (1 Nov 2025 – 31 Jan 2026)

YouTube downloads increased after 10 December, suggesting ongoing adoption and possible migration from other platforms.

Other highly downloaded apps

Insights

- Capcut, Lemon8, Pinterest, Roblox, and Telegram all spiked in December. However, Lemon8 fell back in January.
- Discord rolled-out age assurance in Australia in December, which may have contributed to its download drop.



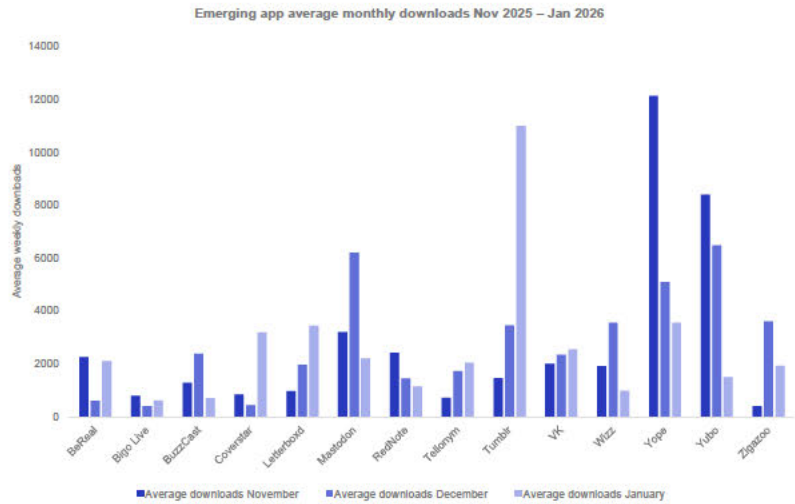
Source : SEMRush, SimilarWeb (1 Nov 2025 – 31 Jan 2026)

- Discord contracted below baseline by late December. According to SimilarWeb, 33% of Discord usage is through the web browser.
- It is possible that Messenger and Whatsapp were already widely used, so their figures could have little impact on migration understanding
- We are engaging with Lemon8, who has self-assessed as an ARSMP

Emerging apps

Insights

- Most emerging apps saw a brief spike around Dec, then fell back. However early January for Coverstar, Letterboxd and Tumblr lifted in the new year. It is too early to call this sustained due to seasonality considerations.



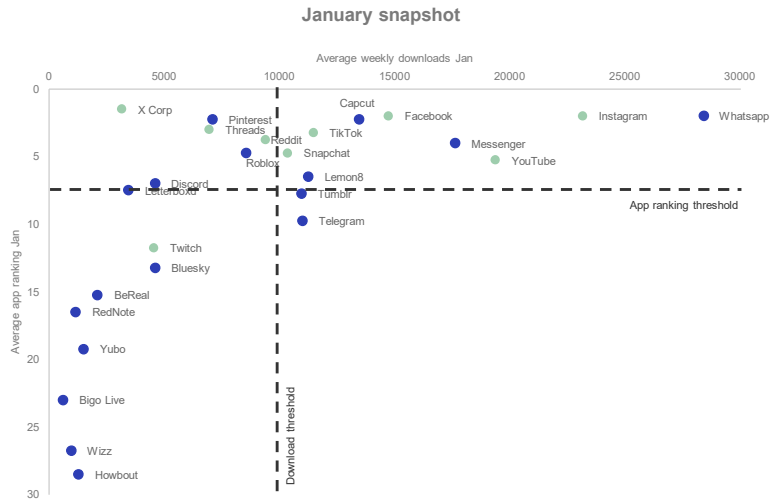
Source : SEMRush, SimilarWeb (1 Nov 2025 – 31 Jan 2026)

We have engaged with Yope, Bluesky and Yubo.
 Bluesky and Yubo have self-assessed as an ARSMP
 We are going to engage with Bigo Live

Landscape snapshot

Insights

- The major platforms and ASRMPs are still dominating app store rankings and downloads, showing no meaningful shift away from them.
- Capcut remains strong, but Lemon8 and Telegram have slipped below earlier levels.
- Tumblr surged in January but it's unclear if this is a real behavioural shift or a seasonal spike.



Source : SEMRush, SimilarWeb (1 Nov 2025 – 31 Jan 2026)

s 47E(d)

Chart definitions

Preliminarily-assessed ARSMP chart inclusion:

Platforms are included if they are assessed by eSafety as an ARSMP

Highly downloaded apps chart inclusion:

Platforms are included if they have a combination of:

- social features such as posting/commenting/sharing, private messaging, livestreaming, friend/follower systems, algorithmic feed
- meets or exceeds 10,000 downloads in a single week during the reporting period

Note: Apps like Google, ChatGPT, Bing, Netflix etc., while highly downloaded, are excluded because they do not have the listed social media features.

Emerging apps chart inclusion:

Platforms were included if they:

- self-assessed as an ARSMP
- appeared in the top 30 of Google or Apple app ranking charts at any time during the reporting period
- have been the subject of public attention

Slide 7

s 22

s 22

Sorry I only just actioned this, but have put in the definitions for each chart for future reference. Thought you might want to review.

s 22 2026-01-15T05:36:45.455

From: Social Media Minimum Age Restrictions
Sent: Thursday, 18 December 2025 4:11 PM
To: s 47F
Cc: s 47F ; Social Media Minimum Age Restrictions; s 22
Subject: RE: Section 63G(3) Notices from the eSafety Commissioner [HSF-AUS01.FID6967495]
[SEC=OFFICIAL]

OFFICIAL

Dear Meta Platforms, Inc.

We confirm receipt and will respond in due course.

Kind regards

Social Media Age Restrictions Team



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.

s 22

A large, solid grey rectangular box covering the majority of the lower half of the page, indicating that the content has been redacted.

From: Julie Inman Grant
Sent: Monday, 22 December 2025 12:15 PM
To: s47F; eSafety Commissioner; s 22; eSafety Industry Supervision; s 22
; Social Media Minimum Age Restrictions
Cc: s47F
s22
Subject: RE: s47G(1)(b) [SEC=OFFICIAL]

OFFICIAL

Hello s47F All:

Thank you for your email.

s 47G(1)(b)



I hope you all have a safe and restful holiday season,

Julie

s 22



From: Social Media Minimum Age Restrictions
Sent: Monday, 22 December 2025 3:27 PM
To: s 47F @hsfkramer.com
Cc: s 47F @hsfkramer.com; Julie Inman Grant; eSafety Commissioner
Subject: RE: Section 63G(3) Notices from the eSafety Commissioner [HSF-AUS01.FID6967495] [SEC=OFFICIAL]
Attachments: 20251222 – SMAR – Facebook – 63G.pdf; 20251222 – SMAR – Instagram – 63G.pdf

OFFICIAL

Dear Meta Platforms, Inc.

Please see attached from the eSafety Commissioner in response to your correspondence of 18 December 2025. We would welcome confirmation of receipt at your earliest convenience.

Kind regards

Social Media Age Restrictions Team



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.



22 December 2025

Meta Platforms, Inc.

Attention: s 47F and s 47F Herbert Smith Freehills Kramer

By email: s 47F [@hsfkramer.com](mailto:s 47F@hsfkramer.com), s 47F [@hsfkramer.com](mailto:s 47F@hsfkramer.com)

Our Reference: 20251222 – SMAR – Facebook – 63G

Variation to Notice requiring you to provide information

(Under s 63G(3) of the *Online Safety Act 2021* (Cth))

s 47E(d)

As a variation, it does not constitute a new decision to give a notice under s 63G(3).

A handwritten signature in black ink that reads "Julie Inman Grant".

Julie Inman Grant
eSafety Commissioner

Attachment: Variation to notice under s 63G(3) of the Act



VARIATION TO NOTICE REQUIRING YOU TO PROVIDE INFORMATION

(Under s 63G(3) of the *Online Safety Act 2021* (Cth))

To: Meta Platforms, Inc.

By email: s 47F [REDACTED] [@hsfkramer.com](mailto:[REDACTED]@hsfkramer.com), s 47F [REDACTED] [@hsfkramer.com](mailto:[REDACTED]@hsfkramer.com)

1. This notice varies the notice given to you under s 63G(3) of the *Online Safety Act 2021* (Cth) on 11 December 2025 (**the Notice**).

2. s 47E(d)

False or misleading information

3. Giving false or misleading information to eSafety is an offence under the *Criminal Code Act 1995* (Cth).

Failure to comply with the Notice

4. You must comply with a requirement under the Notice to the extent you are capable of doing so.



5. Failure to comply with the Notice could result in the commencement of civil penalty proceedings for a civil penalty order of up to AU\$825,000, or other action as determined by the Commissioner.

Confidentiality with the Notice

6. The Notice and its contents should be kept confidential unless eSafety otherwise agrees in writing.
7. You may share the Notice for the purpose of obtaining legal advice should you wish to do so.

Commissioner's disclosure powers

8. The Commissioner has disclosure powers under Part 15 of the Act. The Commissioner may disclose information obtained under the Notice, including to the Minister for Communications (s 208), certain authorities (s 212), and to the general public (e.g. s 217).

Date: 22 December 2025

A handwritten signature in black ink that reads "Julie Inman Grant".

Julie Inman Grant
eSafety Commissioner



22 December 2025

Meta Platforms, Inc.

Attention: s 47F and s 47F Herbert Smith Freehills Kramer

By email: s 47F [@hsfkramer.com](mailto:s 47F@hsfkramer.com); s 47F [@hsfkramer.com](mailto:s 47F@hsfkramer.com)

Our Reference: 20251222 – SMAR – Instagram – 63G

Variation to Notice requiring you to provide information

(Under s 63G(3) of the *Online Safety Act 2021* (Cth))

s 47E(d)

As a variation, it does not constitute a new decision to give a notice under s 63G(3).

A handwritten signature in black ink that reads "Julie Inman Grant".

Julie Inman Grant
eSafety Commissioner

Attachment: Variation to notice under s 63G(3) of the Act



VARIATION TO NOTICE REQUIRING YOU TO PROVIDE INFORMATION

(Under s 63G(3) of the *Online Safety Act 2021* (Cth))

To: Meta Platforms, Inc.

By email: s 47F [REDACTED] [@hsfkramer.com](mailto:[REDACTED]@hsfkramer.com), s 47F [REDACTED] [@hsfkramer.com](mailto:[REDACTED]@hsfkramer.com)

1. This notice varies the notice given to you under s 63G(3) of the *Online Safety Act 2021* (Cth) on 11 December 2025 (**the Notice**).
2. s 47E(d)

False or misleading information

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Failure to comply with the Notice

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6. The Notice and its contents should be kept confidential unless eSafety otherwise agrees in writing.
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Commissioner's disclosure powers

8. The Commissioner has disclosure powers under Part 15 of the Act. The Commissioner may disclose information obtained under the Notice, including to the Minister for Communications (s 208), certain authorities (s 212), and to the general public (e.g. s 217).

Date: 22 December 2025

A handwritten signature in black ink that reads "Julie Inman Grant".

Julie Inman Grant
eSafety Commissioner

From: eSafety Industry Supervision
Sent: Tuesday, 13 January 2026 5:01 PM
To: s 47F ; eSafety Industry Supervision; s 22 ; s 22 ; s 47F
Cc: s 47F
s 22
Subject: RE: Meta follow-up and SMMA communication timeframes [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

Thanks for sharing your blog post.

The OSF pre-registration and research instrumentation are scheduled to be published in the next month. We will share a link to the registration once it is live. In the meantime, eSafety will be releasing additional details about the evaluation shortly, and we will notify you as soon as this information becomes available.

Thanks

s 22

s 22



From: Social Media Minimum Age Restrictions
Sent: Friday, 16 January 2026 1:15 PM
To: s 47F ; Social Media Minimum Age Restrictions
Cc: s 47F
Subject: RE: Section 63G(3) Notices from the eSafety Commissioner [SEC=OFFICIAL]

OFFICIAL

Dear s 47F

We confirm receipt of the correspondence.

Kind regards
Social Media Age Restriction Team

s 22



From: s 47F @hsfkramer.com>
Sent: Thursday, 18 December 2025 2:45 PM
To: s 22 ; Social Media Minimum Age Restrictions
Cc: s 47F
Subject: RE: Section 63G(3) Notices from the eSafety Commissioner [SEC=OFFICIAL] [HSF-AUS01.FID6967495]
Attachments: 20251218 HSK Letter to eSafety - s 47G(1)(a), s .pdf

Dear s 22

As discussed, please see **attached** correspondence.

Kind regards

s 47F

Partner
Herbert Smith Freehills Kramer

s 47F

www.hsfkramer.com

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s 22





Social Media Age Restrictions team
The Office of the Australian eSafety Commissioner
s 47E(d) @esafety.gov.au

18 December 2025
Matter 82808704
By email

Dear Social Media Age Restrictions team

Notices issued under section 63G of the Online Safety Act 2021 (Cth) (the Act) – s 47G(1)(a), s 47G(1)(b)

We refer to the notices issued to Meta on 11 December 2025 in respect of Facebook, Instagram and Threads under s 63G of the Act (**Notices**).

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



Please let us know if any further information would be of assistance.

Yours sincerely

s 47F

Partner
Herbert Smith Freehills Kramer

s 47F

s 47F

Partner
Herbert Smith Freehills Kramer

s 47F

Herbert Smith Freehills Kramer LLP and its affiliated and subsidiary businesses and firms, Herbert Smith Freehills Kramer (US) LLP and its affiliate, and Herbert Smith Freehills Kramer, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills Kramer. We practise in Australia through Herbert Smith Freehills Kramer, an Australian Partnership (ABN 98 773 882 646).

From: s 47F [redacted]@meta.com>
Sent: Friday, 19 December 2025 10:08 AM
To: Julie Inman Grant; eSafety Commissioner; s 22 [redacted] eSafety Industry Supervision;
s 22 [redacted]; Social Media Minimum Age Restrictions
Cc: s 47F [redacted]
Subject: s 47G(1)(b) [redacted]

Hi Julie,

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

[redacted]

[redacted]

[redacted]

s [redacted]

--
s 47F [redacted]
M: s 47F [redacted] | E: s 47F [redacted]@meta.com



From: s 47F @hsfkramer.com>
Sent: Monday, 22 December 2025 3:37 PM
To: Social Media Minimum Age Restrictions
Cc: s 47F; Julie Inman Grant; eSafety Commissioner
Subject: RE: Section 63G(3) Notices from the eSafety Commissioner [SEC=OFFICIAL] [HSF-AUS01.FID6967495]

Dear all

We confirm receipt. Thank you for s 47E(d).

Kind regards

s 47F

Herbert Smith Freehills Kramer

s 47F

www.hsfkramer.com

Global capability. One firm.

[Follow our new LinkedIn page](#)

s 22



From: s 47F @meta.com>
Sent: Monday, 12 January 2026 6:07 PM
To: eSafety Industry Supervision; s 22 ; s 22 ; s 47F
Cc: s 47F ; s 22 ;
Subject: Re: Meta follow-up and SMMA communication timeframes [SEC=OFFICIAL]
Follow Up Flag: Follow up
Flag Status: Flagged

Hi team,

I hope you are all well and were able to enjoy the holiday time.

I wanted to make sure you had seen [our blog post](#) that we published today about our initial compliance and assessment on the social media age ban law.

Are you able to share the details of study design that has been shared on the Open Science Framework?

Many thanks, s 47F

s 22



From: s 47F [redacted]@hsfkramer.com>
Sent: Friday, 16 January 2026 1:00 PM
To: Social Media Minimum Age Restrictions
Cc: s 47F [redacted]
Subject: RE: Section 63G(3) Notices from the eSafety Commissioner [SEC=OFFICIAL]
Attachments: 2026.01.16 - HSF Kramer Letter to eSafety - Schedule B notice response.pdf

Dear s 22 [redacted]

Please see **attached** correspondence.

Kind regards

s 47F [redacted]
Partner
Herbert Smith Freehills Kramer

s 47F [redacted]
www.hsfkramer.com

s 22 [redacted]



Julie Inman Grant
eSafety Commissioner
The Office of the Australian eSafety
Commissioner
s 47E(d) [REDACTED]@esafety.gov.au

16 January 2026
Matter 82808704
By Email

Dear Commissioner

Confidential and commercially sensitive: not for public disclosure

Response to s 63G notice

We act for Meta Platforms, Inc (**Meta**).

We refer to the notices issued to Meta on 11 December 2025 in respect of Facebook and Instagram under s 63G of the *Online Safety Act 2021* (Cth) (**Notices**).

Meta's consolidated response to Schedule B of the two Notices is at **Attachment A**.

Legal professional privilege

In providing its response, Meta does not intend to waive any claim for privilege that may attach to any aspect of the response, including through references to documents in the response.

Confidentiality and commercial sensitivity

Meta's response to the Notices contains confidential and commercially sensitive information. Pursuant to the Notices, Meta's submissions for non-disclosure are at **Attachment D**.

Potential disclosure

Meta reiterates its appreciation for eSafety's confirmation, as set out in your email of 17 December 2025, that any public messaging proposing to mention Meta specifically will be preceded by engagement with Meta.

We otherwise reiterate our request (as set out in our letters dated 16 and 18 December 2025) for an opportunity to comment on the form of any material to be released to the general public that is derived from Meta's response to the Notices.

Doc 2067885723.3



Next steps

Please let us know if there is anything in relation to the response or matters outlined above you would like to discuss.

Yours sincerely

s 47F



Partner
Herbert Smith Freehills Kramer

s 47F



s 47F

Partner
Herbert Smith Freehills Kramer

s 47F



Herbert Smith Freehills Kramer LLP and its affiliated and subsidiary businesses and firms, Herbert Smith Freehills Kramer (US) LLP and its affiliate, and Herbert Smith Freehills Kramer, an Australian Partnership, are separate member firms of the international legal practice known as Herbert Smith Freehills Kramer. We practise in Australia through Herbert Smith Freehills Kramer, an Australian Partnership (ABN 98 773 882 646).



Attachment A

Information in response to Schedule B of the Notices

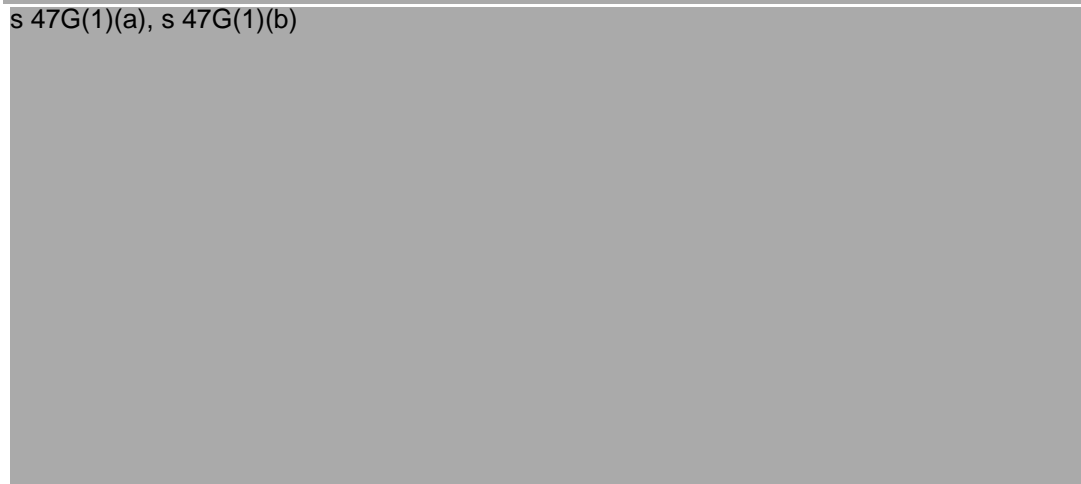
1

Item 1

s 47E(d)




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



2


Item 2

s 47E(d)






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



3

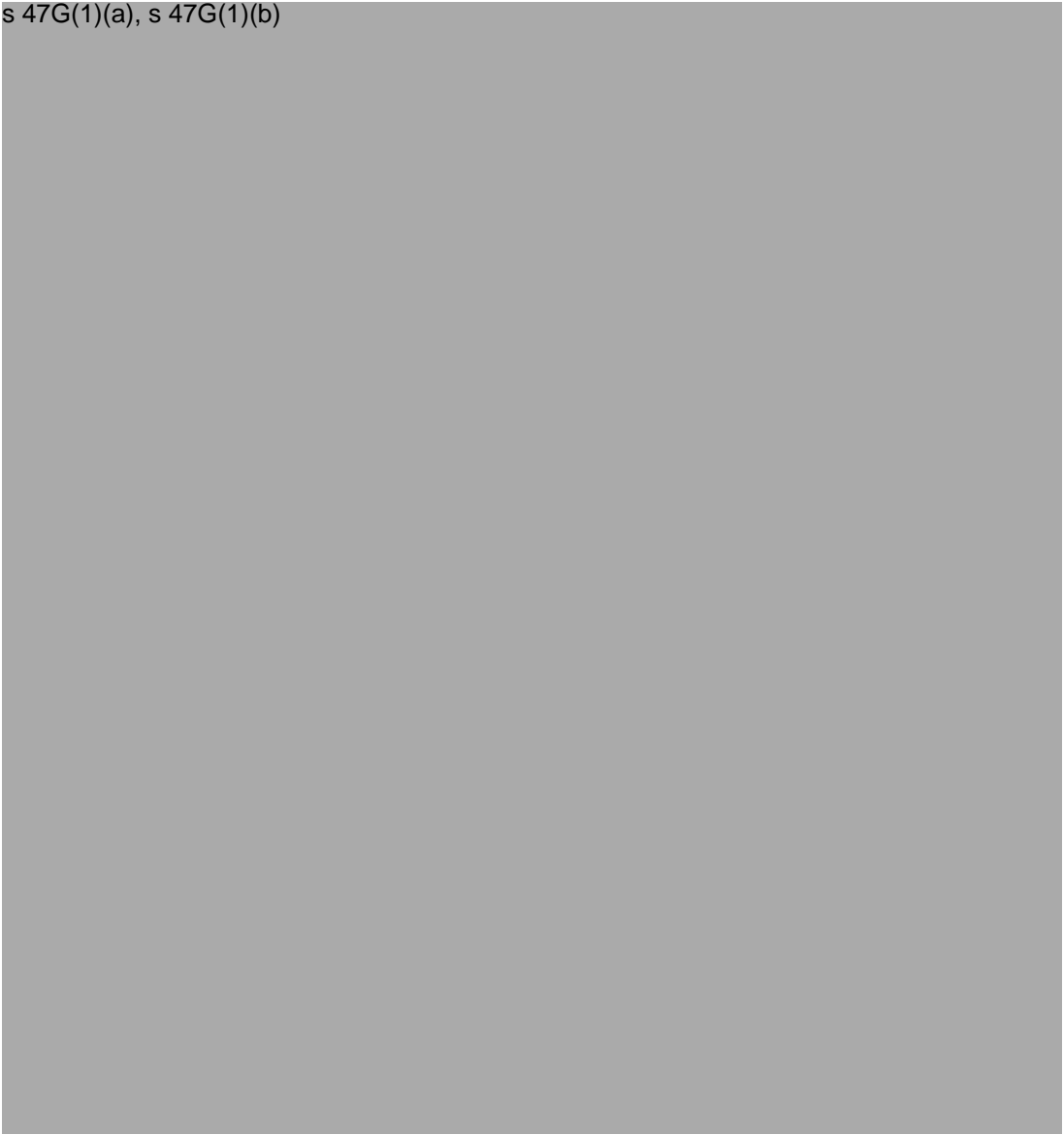
Item 3

s 47E(d)





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







4

Item 4

s 47E(d)




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






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




5 Items 5 and 6

s 47E(d)



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





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

6 Item 7, 8 and 9

s 47E(d)

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

7 Item 10

s 47E(d)

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




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



Attachment B

Information in response to Item 2(a) of the Notice – Facebook

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



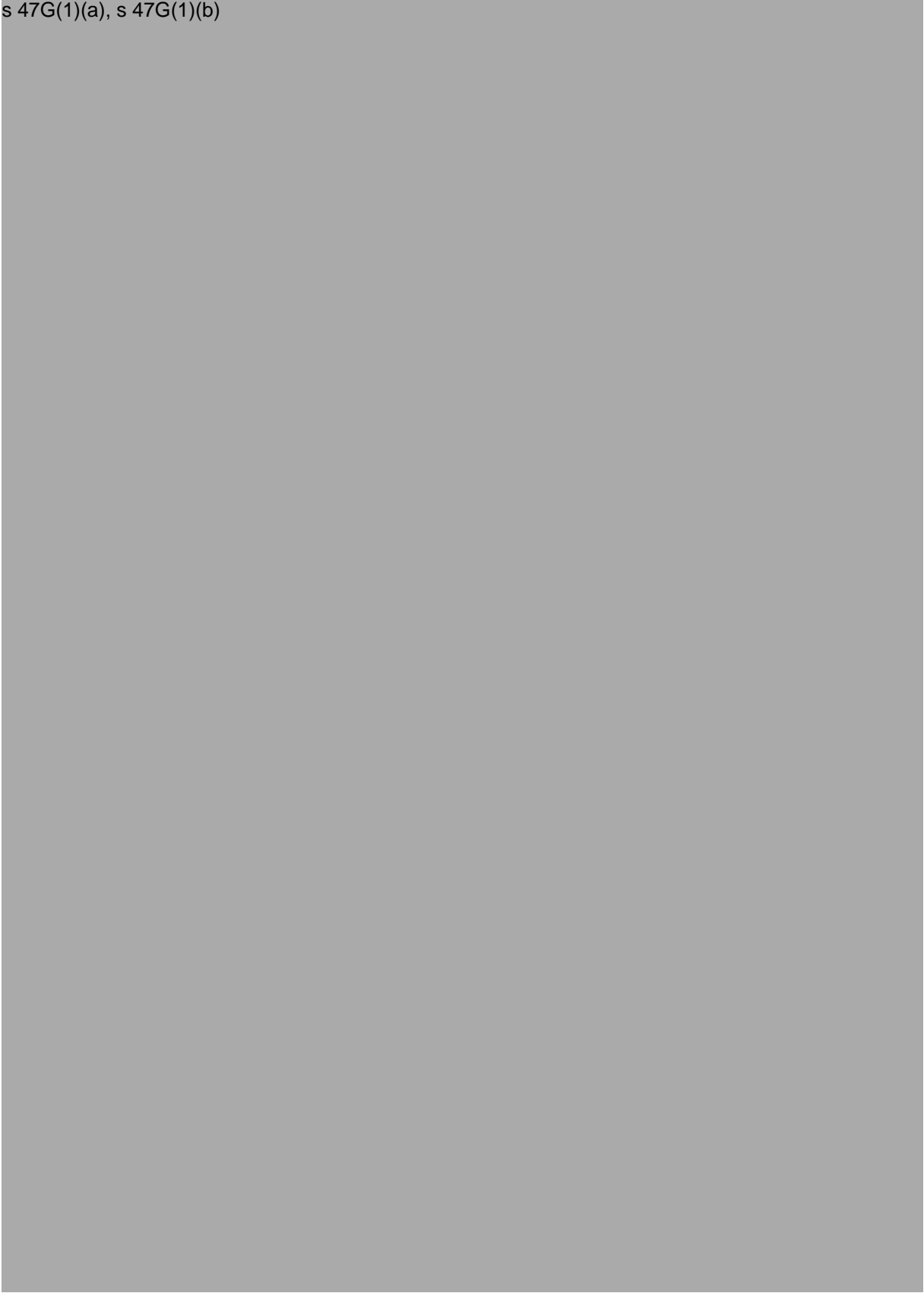


s 47G(1)(a), s 47G(1)(b)






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






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





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






Attachment C

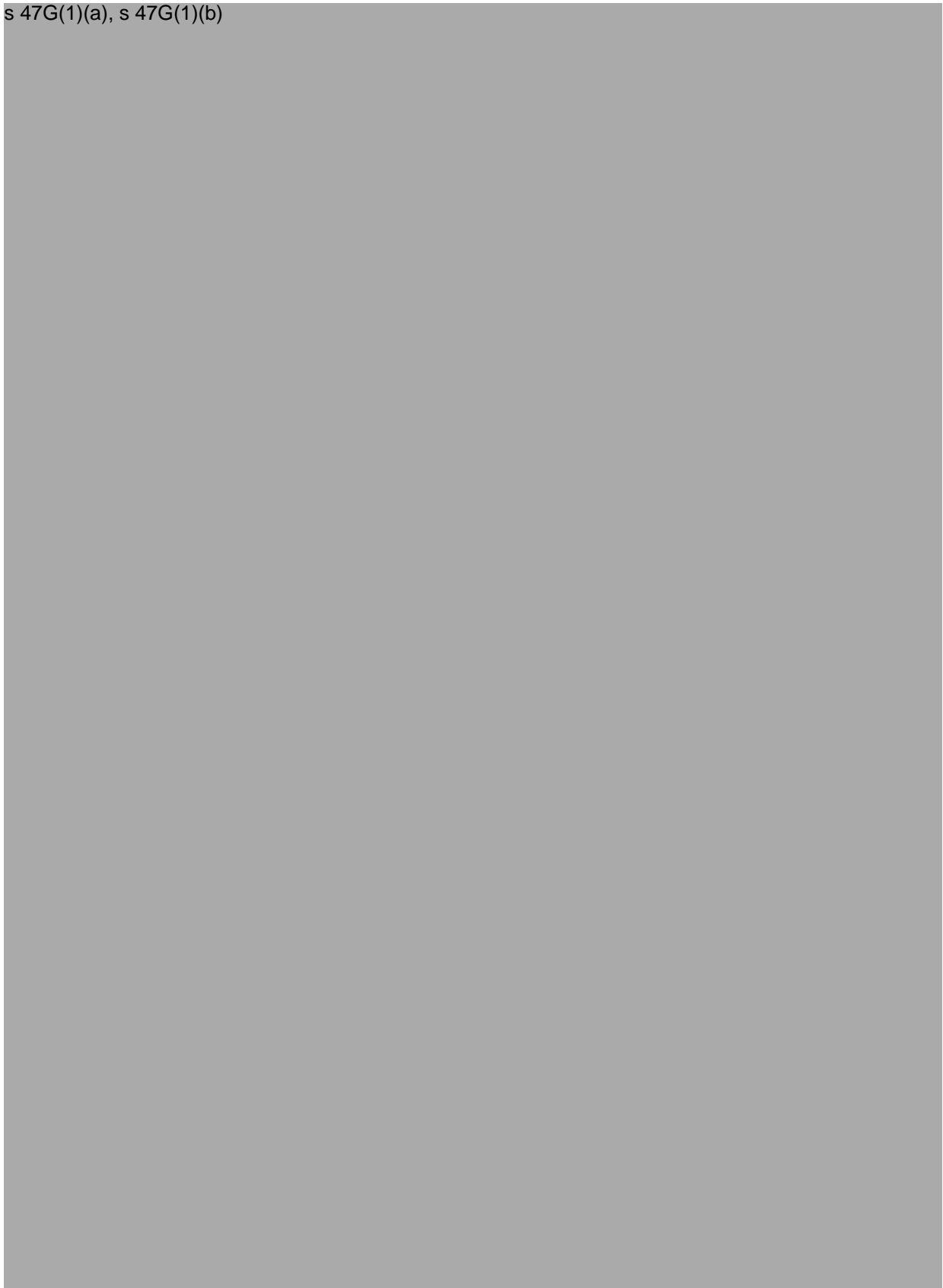
Information in response to Item 2(a) of the Notice – Instagram

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



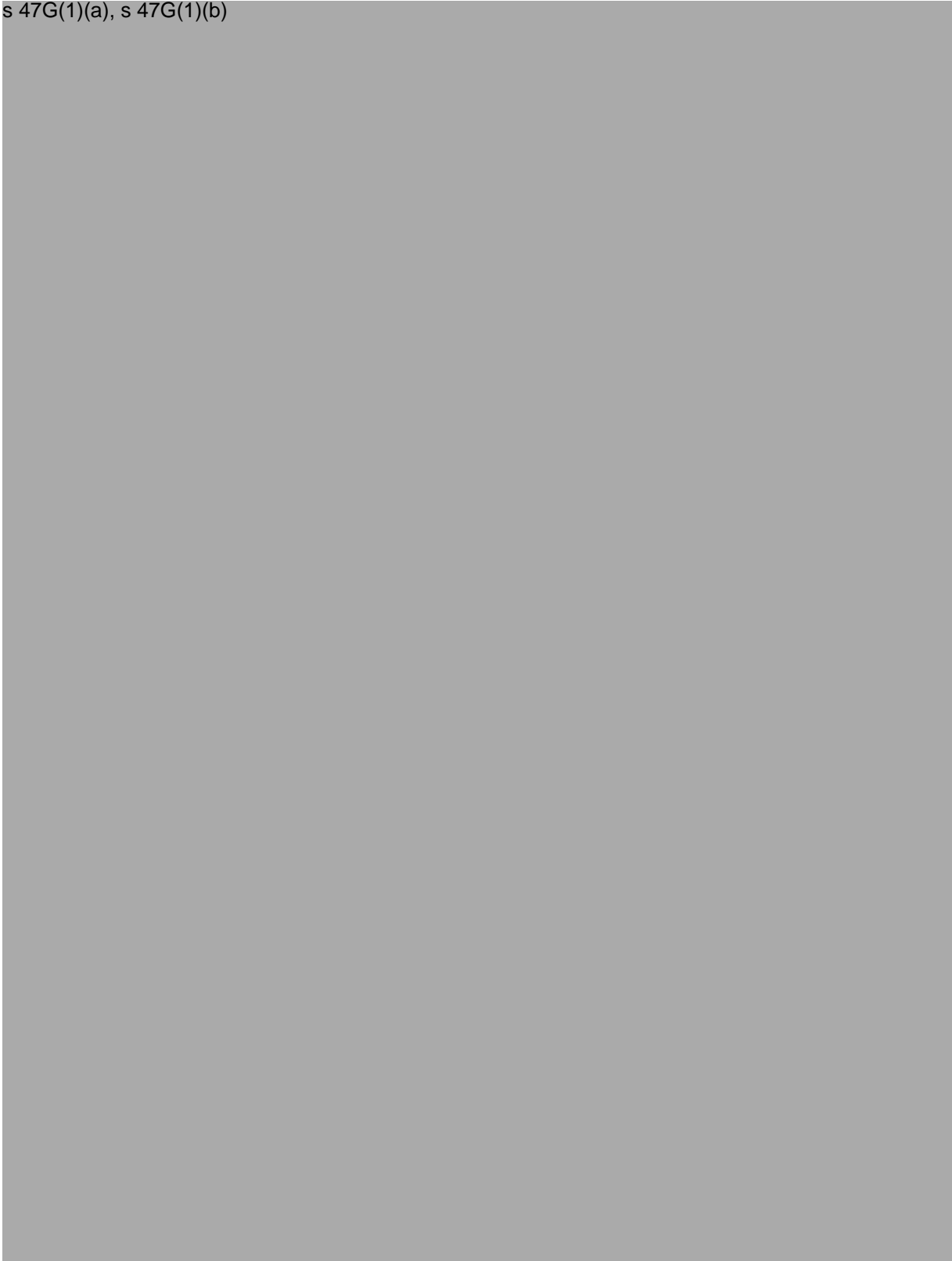


s 47G(1)(a), s 47G(1)(b)





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






Attachment D

Submissions for non-disclosure

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



Question number in Schedule B to the Notices	Content in Meta's response that this submission relates to	Submission Category	Specific Reason
s 47G(1)(a), s 47G(1)(b)			

Question number in Schedule B to the Notices	Content in Meta's response that this submission relates to	Submission Category	Specific Reason
s 47G(1)(a), s 47G(1)(b)	[Redacted content]		

Question number in Schedule B to the Notices	Content in Meta's response that this submission relates to	Submission Category	Specific Reason
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s 47G(1)(a), s 47G(1)(b)





Question number in Schedule B to the Notices	Content in Meta's response that this submission relates to	Submission Category	Specific Reason
--	--	---------------------	-----------------

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

From: eSafety Industry Supervision
Sent: Friday, 19 December 2025 3:41 PM
To: s 47F@snapchat.com
Cc: eSafety Industry Supervision; s 47F@snap.com
Subject: RE: Social Media Minimum Age - Facial age estimation [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

Unfortunately, the eSafety colleagues needed for this meeting are in another session that can't be moved. Thanks so much for your flexibility and understanding. I'll send an invite to you and the people listed below shortly.

Thanks

s 22

s 22

eSafety - Industry Supervision

s 22



From: Social Media Minimum Age Restrictions
Sent: Wednesday, 24 December 2025 11:36 AM
To: s 47F
Cc: Social Media Minimum Age Restrictions
Subject: RE: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]

OFFICIAL

Hi s 47F

Thank you for your email outlining Snap's request.

eSafety agrees to Snap Inc. sharing the contents of the Notice (ref: 20251211 – SMAR – Snapchat – 63G) with Snap Inc.'s age verification vendor k-ID and relevant sub-vendors, including Connect ID and Privately, for the purpose of assisting Snap Inc. to respond to the information required at Schedule B to the Notice.

This agreement is provided on the basis that Snap Inc.'s vendors and sub-vendors also keep the contents of the Notice confidential.

Kind regards,

Social Media Age Restriction Team



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.

s 22

A large, solid grey rectangular box covering the bottom half of the page, indicating that the content has been redacted.

From: Social Media Minimum Age Restrictions
Sent: Monday, 12 January 2026 12:06 PM
To: s 47F
Cc: Social Media Minimum Age Restrictions
Subject: RE: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]

OFFICIAL

Dear Snap Inc.

We confirm receipt.

Kind regards,

Social Media Age Restrictions Team



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.

From: Social Media Minimum Age Restrictions
Sent: Friday, 23 January 2026 11:43 AM
To: s 47F @snap.com
Cc: s 47F @snapchat.com; s 47F @snap.com; Julie Inman Grant
Subject: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]
Attachments: Attachment A - Submissions for non-disclosure January 2026 - Snap.pdf; 20260123 - SMAR - Snapchat - 63G.pdf

OFFICIAL

Dear s 47F

Please find attached a Notice given by the eSafety Commissioner under s 63G(3) of the Online Safety Act 2021 (Cth) and Attachment A – Submissions for non-disclosure.

If you have any questions about the Notice, please contact the Social Media Age Restrictions team at s 47E(d) @esafety.gov.au.

We would welcome confirmation of receipt at your earliest convenience.

Kind regards,

Social Media Age Restrictions Team



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.



23 January 2026

Snap Inc.

By email: s [redacted]@snap.com;

CC: s 47F [redacted]@snapchat.com; s 47F [redacted]@snap.com

Our reference: 20260123 – SMAR – Snapchat – 63G

Notice requiring you to provide information

1. The eSafety Commissioner (**Commissioner**) is required to monitor and promote compliance with the *Online Safety Act 2021* (Cth) (**the Act**), including the social media minimum age obligation in s 63D of the Act.
2. Section 63D states that a provider of an age-restricted social media platform must take reasonable steps to prevent age-restricted users (that is, an Australian child who has not reached 16 years) from having accounts with the age-restricted social media platform.
3. Failure to comply with s 63D could result in the commencement of civil penalty proceedings for a civil penalty order of up to AU\$49.5 million for a single contravention by a body corporate, or other action as determined by the eSafety Commissioner.
4. To monitor a provider's compliance with s 63D, the Commissioner can require the production of information relevant to a provider's compliance with s 63D (s 63G(3)).
5. Please see **enclosed** a notice given to Snap Inc. under s 63G(3) (**the Notice**) requiring you to provide information relevant to your compliance with s 63D in respect of Snapchat.

Power to give the Notice

6. Division 4 of Part 4A of the Act gives the Commissioner the power to, by written notice, require a person to give information relevant to their compliance with s 63D where the Commissioner believes on reasonable grounds that:
 - a. the person is a provider of an age-restricted social media platform; and
 - b. the person has information relevant to the person's compliance with s 63D.

Basis for giving the Notice

7. I give the Notice to you on the basis that I believe on reasonable grounds that:
- Snap Inc. is the provider of Snapchat; and
 - Snapchat is an age-restricted social media platform; and
 - Snap Inc. has information relevant to its compliance with s 63D in respect of Snapchat.

Purpose and context of the Notice

8. s 47E(d)

Required action

9. The Notice requires you to provide the information specified in Schedule A to the Notice in the manner and form prescribed at Schedule A to the Notice to the office of the eSafety Commissioner (**eSafety**) by **10am AEDT on 16 February 2026**.
10. When providing the information required under the Notice, Snap Inc. should have regard to [eSafety's Regulatory Guidance](#) which outlines that steps taken by providers should be:
- Reliable, accurate, robust and effective
 - Privacy-preserving and data-minimising
 - Accessible, inclusive and fair
 - Transparent
 - Proportionate
 - Evidence-based and responsive to emerging technology and risk.
11. In providing required information, please include definitions of relevant terms where applicable.

Failure to comply with the Notice

12. Snap Inc. must comply with a requirement under s 63G to the extent that it is capable of doing so (s 63H).
13. Failure to comply with the Notice is a contravention of s 63H and could result in the commencement of civil penalty proceedings for a civil penalty order of up to AU\$825,000 for a single contravention by a body corporate, or other action as determined by the Commissioner.

Extension of time to comply

14. If Snap Inc. requires additional time to comply with the Notice, please contact the Social Media Age Restrictions team by email at s 47E(d) [REDACTED]@esafety.gov.au by **5pm AEDT on 29 January 2026**. Please provide reasons for why you are seeking an extension of time.
15. The Notice due date continues to apply unless eSafety confirms an extension is granted.

Confidentiality of the Notice

16. The Notice and its contents should be kept confidential unless eSafety otherwise agrees in writing.
17. You may share the Notice for the purpose of obtaining legal advice should you wish to do so.

Confidentiality of compelled information and Commissioner's disclosure powers

18. The Commissioner has disclosure powers under Part 15 of the Act. The Commissioner may disclose information obtained under the Notice in certain circumstances, including to the Minister for Communications (s 208), certain authorities (s 212), and to the general public (e.g. s 217).
19. Please complete the **enclosed** disclosure of information template if you wish to provide reasons why particular information should not be disclosed.

Review rights

20. The decision to give you the Notice is not a reviewable decision under s 220 of the Act. As such, it is not subject to internal review or external merits review by the Administrative Review Tribunal.



21. You may be able to seek judicial review of the Notice. Judicial review does not consider the merits of the decision to give you the Notice, it considers the legality of the decision.
22. If you have any questions about the Notice, please contact the Social Media Age Restrictions team at [s 47E\(d\) \[REDACTED\]@esafety.gov.au](#).

Yours sincerely,

A handwritten signature in black ink that reads "Julie Inman Grant".

Julie Inman Grant
eSafety Commissioner

Attachment: Notice under s 63G(3)
Disclosure of information template

NOTICE REQUIRING YOU TO PROVIDE INFORMATION
(under s 63G(3) of the *Online Safety Act 2021* (Cth))

To: Snap Inc.

By email: s [REDACTED] [@snap.com](mailto:s[REDACTED]@snap.com);

CC: s 47F [REDACTED] [@snapchat.com](mailto:s[REDACTED]@snapchat.com); s 47F [REDACTED] [@snap.com](mailto:s[REDACTED]@snap.com)

1. This notice (**the Notice**) is given to you under s 63G(3) of the *Online Safety Act 2021* (Cth) (**the Act**) and requires you to provide the information specified in Schedule A to the Notice in the manner and form specified in Schedule A to the Notice by **10am AEDT on 16 February 2026** to the extent that you are capable of doing so.
2. I am giving you the Notice because I am satisfied that:
 - a. Section 63G(3) authorises the eSafety Commissioner (**Commissioner**) to give a written notice to a person to whom s 63G applies requiring them to give information to the Commissioner relevant to the person's compliance with s 63D of the Act.
 - b. The conditions for giving the Notice are met because I believe on reasonable grounds that:
 - i. Snap Inc. (**Snap**) is the provider of Snapchat; and
 - ii. Snapchat is an age-restricted social media platform; and
 - iii. Snap has information relevant to its compliance with s 63D in respect of Snapchat.

False or misleading information

3. Giving false or misleading information to eSafety is an offence under the *Criminal Code Act 1995* (Cth).

Failure to comply with the Notice

4. You must comply with a requirement under the Notice to the extent you are capable of doing so.

5. Failure to comply with the Notice could result in the commencement of civil penalty proceedings for a civil penalty order of up to AU\$825,000, or other action as determined by the Commissioner.

Confidentiality of the Notice

6. The Notice and its contents should be kept confidential unless eSafety otherwise agrees in writing.
7. You may share the Notice for the purpose of obtaining legal advice should you wish to do so.

Commissioner's disclosure powers

8. The Commissioner has disclosure powers under Part 15 of the Act. The Commissioner may decide to disclose information obtained under the Notice, including to the Minister for Communications (s 208), certain authorities (s 212), and to the general public (e.g. s 217).



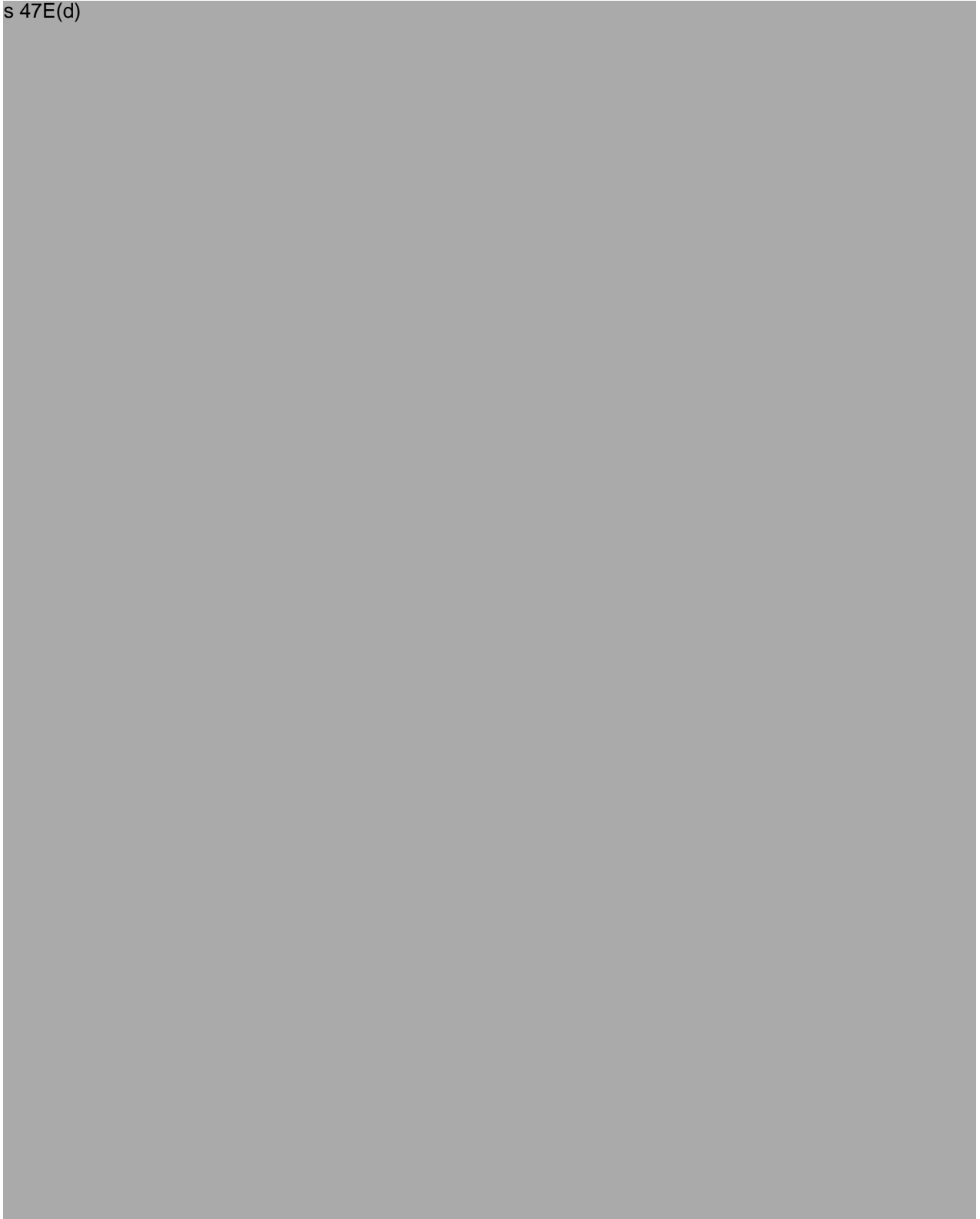
Julie Inman Grant
eSafety Commissioner



SCHEDULE A – INFORMATION REQUIRED TO BE PROVIDED

The information you must provide is as follows:

s 47E(d)



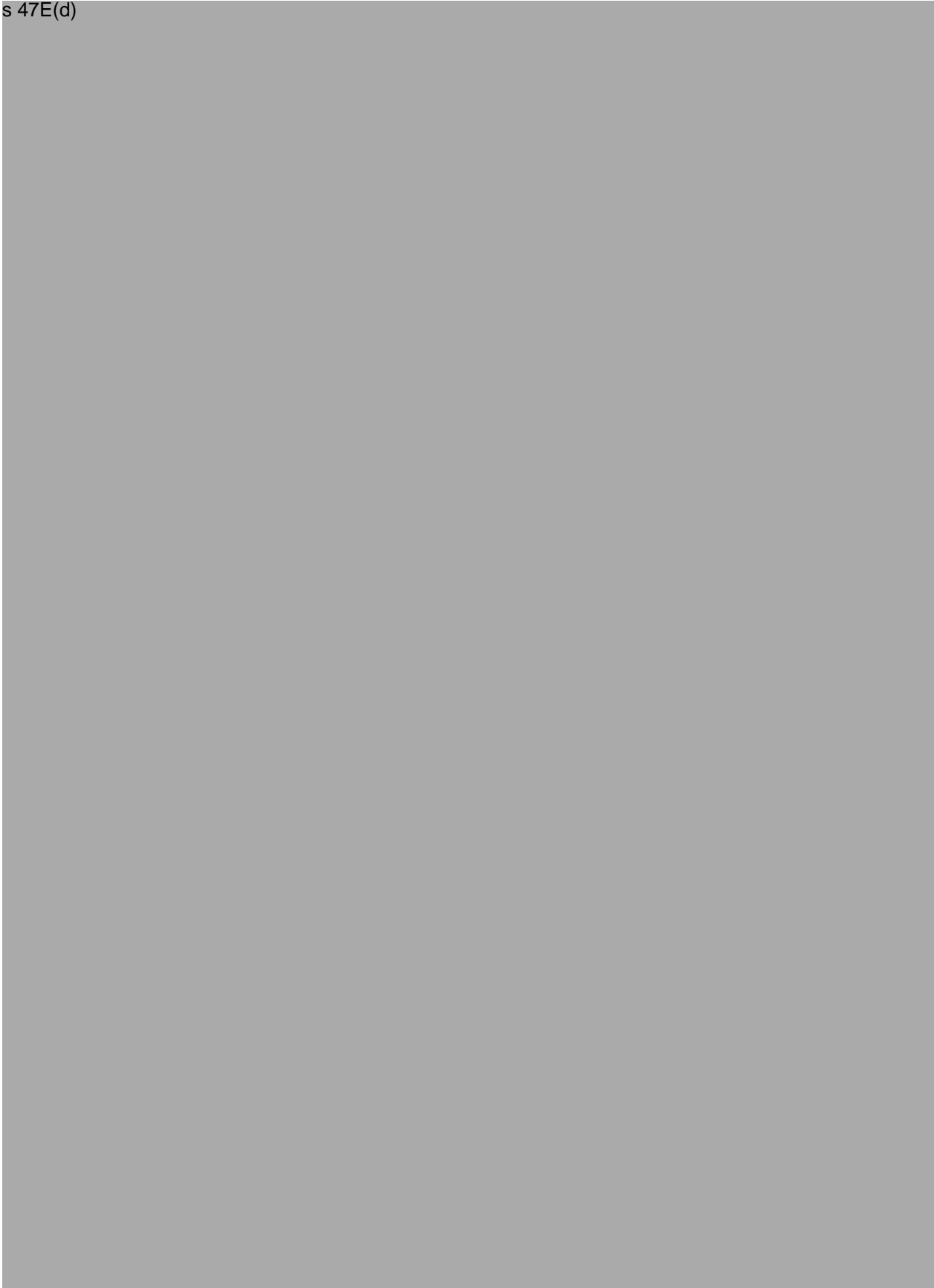


s 47E(d)



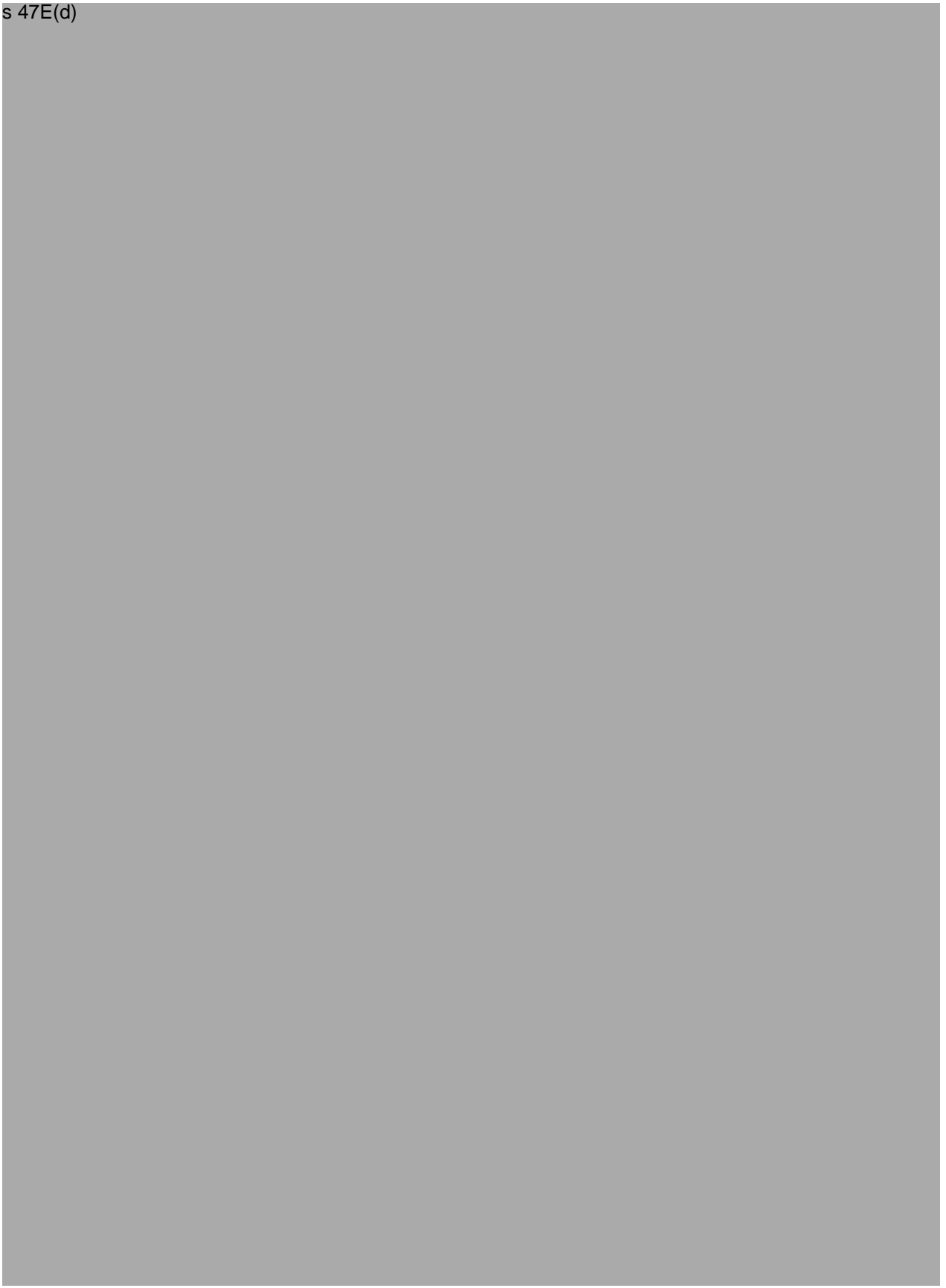


s 47E(d)



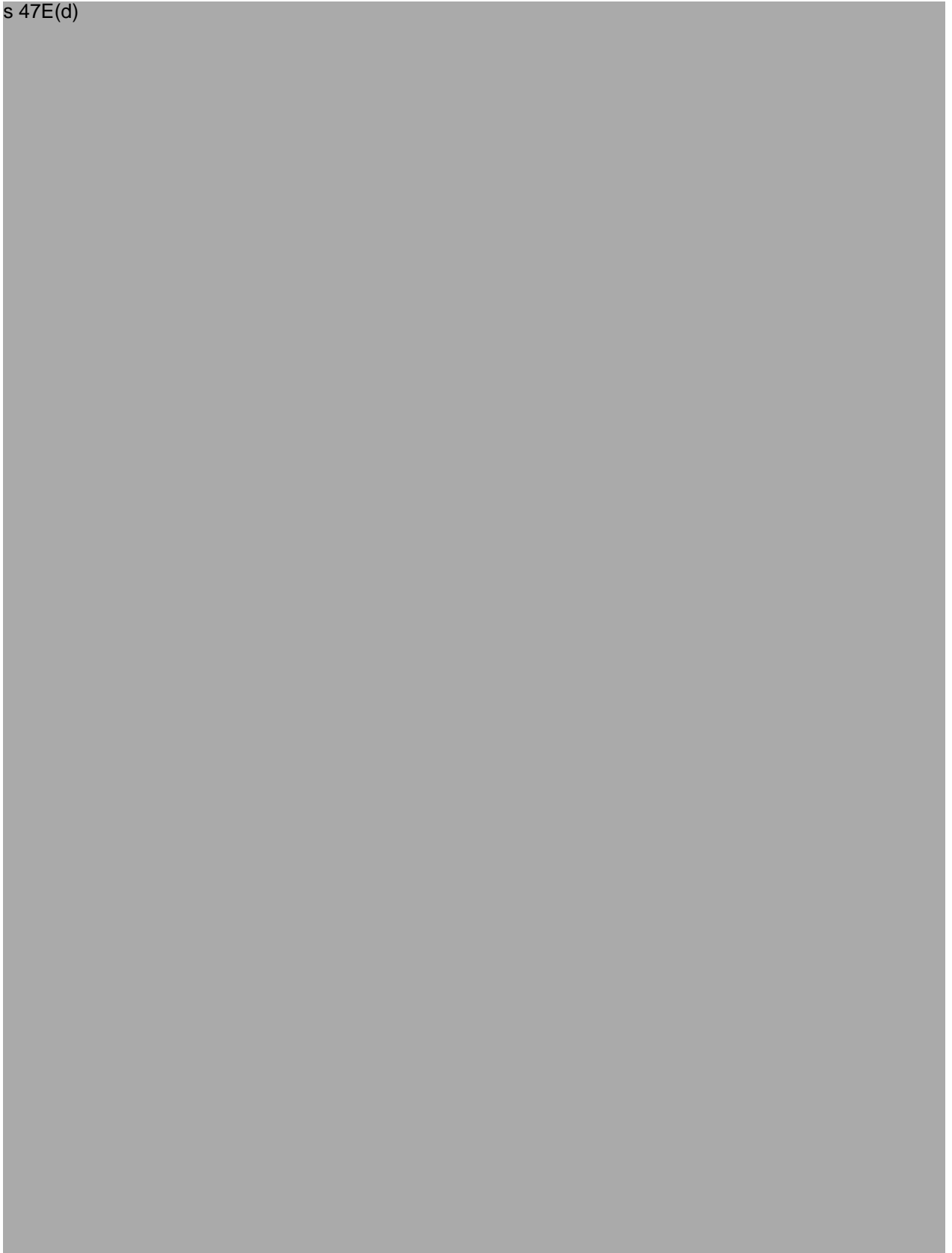


s 47E(d)





s 47E(d)



This information must be provided in the following manner and form:

- The information is to be provided in a PDF and sent to s 47E(d) [@esafety.gov.au](mailto: @esafety.gov.au).
- Where the information sought is a number and the number is zero, you must provide the number and not respond with 'not applicable' or 'N/A'. Additional context may also be provided.
- Where Snap Inc. considers it is not capable of providing the required information, Snap Inc. should include statements explaining the basis on which it has determined it is not capable of providing the information.

The following definitions apply in this schedule:

Age-restricted social media platform has the meaning given by s 63C of the *Online Safety Act 2021* (Cth).

Age-restricted user means an Australian child who has not reached 16 years.

Monthly active end-user refers to an account holder who opened the Snapchat app at least once during the month of November 2025.

Confidentiality and the eSafety Commissioner's disclosure powers

Confidentiality

1. You are required to provide the information sought in the s 63G notice. The fact that certain information is confidential is not generally an excuse from complying with a s 63G notice.
2. Information obtained under a s 63G notice is not automatically confidential. For example, if eSafety receives information that is already in the public domain, the fact that the information was received in response to a s 63G notice does not mean the information becomes confidential.

Disclosure of compelled information

3. The eSafety Commissioner (**Commissioner**) may disclose information obtained under a s 63G notice in certain circumstances, including to the Minister for Communications (s 208 of the *Online Safety Act 2021* (Cth) (**the Act**)), certain authorities¹ (s 212) and to the general public² (e.g. s 217).
4. In the course of considering disclosure of compelled information, eSafety will take into account the objectives of the Act and the relevant functions of the Commissioner in s 27 of the Act, including:
 - to promote online safety for Australians;
 - to support and encourage the implementation of measures to improve online safety for Australians;
 - to collect, analyse, interpret and disseminate information relating to online safety for Australians;
 - to publish (whether on the internet or otherwise) reports and papers relating to online safety for Australians;
 - to advise and give the Minister reports about online safety for Australians; and
 - to monitor and promote compliance with the Act.
5. eSafety recognises that some information may not be suitable for disclosure and invites you to make submissions about the disclosure of information provided in response to the s 63G notice by the due date of the s 63G notice.
6. Any submissions that you provide are voluntary and do not form part of your obligation to respond to the s 63G notice. Your submissions will not be disclosed, unless required by another legal process.
7. eSafety does not intend to disclose information obtained under a s 63G notice where it is satisfied that:
 - (a) the information falls into one of the categories in Table 1 below; and
 - (b) your reasons demonstrate that you would be, or would reasonably be likely to be, adversely affected if the information were disclosed. It is not sufficient to simply assert that disclosure would fall into one of the categories in Table 1.

¹ The Commissioner may disclose information to certain authorities (including the Office of the Australian Information Commissioner) if the Commissioner is satisfied that the information will enable or assist the authority to perform or exercise any of the authority's functions or powers.

² The Commissioner may disclose information that relates to the affairs of a person if the person has consent to the disclosure and the disclosure is in accordance with that consent (s 215 of the OSA); the Commissioner may disclose information if it is already publicly available (s 216 of the OSA); the Commissioner may disclose (a) summaries of de-identified information; and (b) statistics derived from de-identified information (s 217 of the OSA).

Table 1: Categories of information that eSafety will consider not publishing

Category of information	Includes	Relevant Factors
Commercial in confidence	Trade secrets. Information with commercial value, where that value would be diminished if the information were published.	Matters eSafety will consider include: <ul style="list-style-type: none"> - the extent to which information is already publicly known - measures taken to guard secrecy - the value of the information to its owner and competitors - the effort and money spent by the owner in developing the information - the ease or difficulty with which others might acquire or duplicate the information - the commercial harm that could occur from publication - other relevant information or submissions raised.
Other business information that would be unreasonable to publish	Information about an individual's business or professional affairs, or information about the business, commercial or financial affairs of an organisation or undertaking (business information) that would unreasonably affect that person adversely in respect of their lawful business or professional affairs or that organisation or undertaking in respect of its lawful business, commercial or financial affairs.	Matters eSafety will consider include: <ul style="list-style-type: none"> - whether the information is business information - how the publication of the information could have an unreasonable adverse impact on the individual or business.
Law enforcement and public safety	Information that could affect law enforcement or public safety, including disclosing methods or procedures for preventing, detecting, investigating, or dealing with matters arising out of, breaches or evasions of the law. Information that could assist individuals and groups from deliberately contravening or circumventing safety and security measures.	Matters eSafety will consider include: <ul style="list-style-type: none"> - whether the methods or procedures are publicly known or prevalent across industry. - the level of detriment that is likely to occur from the disclosure of any lawful methods or procedures for investigating, preventing, detecting or dealing with breaches of the law. - how information could assist individuals in contravening company safety policies and interventions and the level of detriment that is likely to occur. Information that eSafety will not normally publish: <ul style="list-style-type: none"> - Specific indicators, for example behavioural indicators (new account contacting multiple children) that might companies use, or technical indicators (e.g. device and IP addresses); - Language/terms searched for; - Detailed explanations or information on how technologies work and their weaknesses/vulnerabilities; - "New technology" that is not currently in the public domain.
Personal information	Information about a natural person.	Matters eSafety will consider: <ul style="list-style-type: none"> - whether the information is about an identified individual or an individual who is reasonably identifiable from the summary or other sources - whether the information in the summary could be de-identified so that is no longer about an identifiable individual or individual who is reasonably identifiable.

Table 2: Submission by provider

Please provide your submissions in the below table. It will assist if you provide submissions in the following format:

- 1) Question # in Schedules A and B to the Notice;
- 2) Specific content in provider’s response that submission relates to;
- 3) Which ‘**Category of information**’ in Table 1 the submission relates to (you may identify more than one where relevant); and
- 4) Specific reasons that demonstrate that you would be, or would be reasonably likely to be, adversely affected if the information were disclosed (carefully consider ‘**relevant factors**’ in Table 1).

Question number in Schedule A to the Notice	Content in provider’s response that submission relates to	Submission Category	Specific Reason
6a.	<i>E.g. “Provider does xyz on the service”</i>	<i>E,g, Law enforcement and public safety</i>	<i>Specific reason explaining why disclosure would be likely to cause any real, significant or material harm – please carefully consider relevant factors in Table 1.</i>

Question number in Schedule B to the Notice	Content in provider’s response that submission relates to	Submission Category	Specific Reason
6a.	<i>E.g. “Provider does xyz on the service”</i>	<i>E,g, Law enforcement and public safety</i>	<i>Specific reason explaining why disclosure would be likely to cause any real, significant or material harm – please carefully consider relevant factors in Table 1.</i>

From: Social Media Minimum Age Restrictions
Sent: Friday, 30 January 2026 5:59 PM
To: s 47F
Cc: s 47F @snapchat.com; s 47F @snap.com
Subject: Extension request for 20260123 – SMAR – Snapchat – 63G [SEC=OFFICIAL:Sensitive]
Attachments: 20260130 - SMAR - Snapchat - 63G - Variation.pdf

OFFICIAL: Sensitive

Dear s 47F

Please find attached correspondence from the Acting eSafety Commissioner varying the notice in response to your request for an extension made on 27 January 2026. An extension has been given to **4pm on 2 March 2026**. We would welcome confirmation of receipt at your earliest convenience.

Best,

s 22
Industry Compliance and Enforcement

s 22
 s 22
 esafety.gov.au



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.



30 January 2026

Snap Inc.

By email: [s \[redacted\]@snap.com](mailto:s[redacted]@snap.com)

CC: [s 22 \[redacted\]@snapchat.com](mailto:s 22 [redacted]@snapchat.com); [s 22 \[redacted\]@shap.com](mailto:s 22 [redacted]@shap.com)

Our Reference: 20260123 – SMAR – Snapchat – 63G

Variation to Notice requiring you to provide information

(Under s 63G(3) of the *Online Safety Act 2021* (Cth))

Further to your correspondence of 27 January 2026 [s 47E\(d\)](#) [redacted]

[redacted] please see enclosed a variation to the notice.

As a variation, it does not constitute a new decision to give a notice under s 63G(3).

Should you wish to provide reasons why particular information should not be disclosed using the disclosure of information template, you can provide this to eSafety by **4pm AEDT on 9 March 2026**.

s 22 [redacted]

Kathryn King
Acting eSafety Commissioner

Attachment: Variation to notice under s 63G(3) of the Act

VARIATION TO NOTICE REQUIRING YOU TO PROVIDE INFORMATION

(Under s 63G(3) of the *Online Safety Act 2021* (Cth))

To: Snap Inc.

By email: s [REDACTED] [@snap.com](mailto:s[REDACTED]@snap.com)

CC: s 47F [REDACTED] [@snapchat.com](mailto:[REDACTED]@snapchat.com); s 47F [REDACTED] [@snap.com](mailto:s[REDACTED]@snap.com)

1. This notice varies the notice given to you under s 63G(3) of the *Online Safety Act 2021* (Cth) on 23 January 2026 (**the Notice**).

2. s 47E(d)

False or misleading information

3. Giving false or misleading information to eSafety is an offence under the *Criminal Code Act 1995* (Cth).

Failure to comply with the Notice

4. You must comply with a requirement under the Notice to the extent you are capable of doing so.

5. Failure to comply with the Notice could result in the commencement of civil penalty proceedings for a civil penalty order of up to AU\$825,000, or other action as determined by the Commissioner.

Confidentiality of the Notice

6. The Notice and its contents should be kept confidential unless eSafety otherwise agrees in writing.

7. You may share the Notice for the purpose of obtaining legal advice should you wish to do so.

Commissioner's disclosure powers

8. The Commissioner has disclosure powers under Part 15 of the Act. The Commissioner may disclose information obtained under the Notice, including to the Minister for Communications (s 208), certain authorities (s 212), and to the general public (e.g. s 217).

Date: 30 January 2026

s 22



Kathryn King
Acting eSafety Commissioner

From: s 47F @snapchat.com>
Sent: Monday, 12 January 2026 11:50 AM
To: Social Media Minimum Age Restrictions
Subject: Re: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]
Attachments: 20260112 Snap's Schedule B Response to eSafety's RFI dated 11 December 2025.pdf;
20260112 Snap's confidentiality submissions for Schedule B of eSafety SMMA RFI.pdf

Dear s 22

Please find attached Snap's response to the request for information specified in Schedule B to the Notice.

Please also find attached our submission seeking non-disclosure of the specific confidential information that we have highlighted in yellow in our response.

If possible, we kindly ask eSafety to provide advance notice of any plans to publish any information from our response, including and especially the information for which we are seeking non-disclosure.

I would be grateful if you could please confirm receipt of this email.

Kind regards

s
47F

--

s 47F

Snap Inc.

M: s 47F

E: s @snapchat.com

Snapchat: s 47F

s 22



Snap's submission to Schedule B of eSafety's RFI dated 11 December 2025

The data provided in this Schedule B have been compiled from our internal systems to the best of our ability and knowledge within the requested time.

We request that the information highlighted in yellow be kept confidential for the reasons set out in our confidentiality submission attached.

The information you must provide is as follows:

1. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]

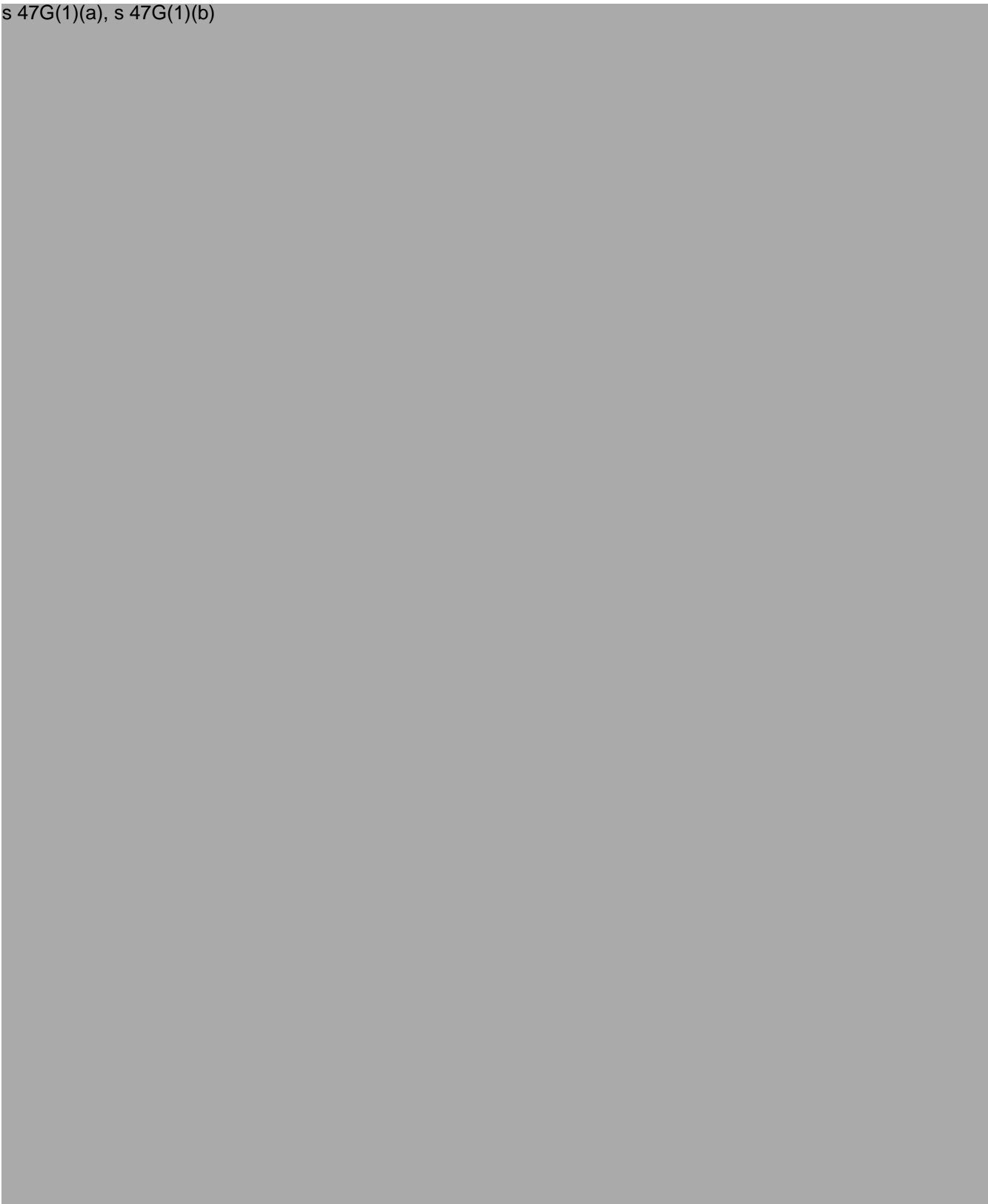
2. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]

a. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]


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




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




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




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



b. s 47E(d)



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



c. s 47E(d)

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

3. s 47E(d)

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

a. s 47E(d)

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

i. s 47E(d)

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

ii. s 47E(d)

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

4. s 47E(d)

s 47E(d)

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

5. s 47E(d)

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

a. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]

6. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]

7. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]

8. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]

9. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]


10. s 47E(d) [Redacted]

s 47G(1)(a), s 47G(1)(b) [Redacted]

Snap's Confidentiality Submissions for our Schedule B response


Question number in Schedule A to the Notice	Content in provider's response that submission relates to	Submission Category	Specific Reason
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s 47G(1)(a), s 47G(1)(b)




Question number in Schedule A to the Notice	Content in provider's response that submission relates to	Submission Category	Specific Reason
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s 47G(1)(a), s 47G(1)(b)




Question number in Schedule A to the Notice	Content in provider's response that submission relates to	Submission Category	Specific Reason
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s 47G(1)(a), s 47G(1)(b)




Question number in Schedule A to the Notice	Content in provider's response that submission relates to	Submission Category	Specific Reason
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s 47G(1)(a), s 47G(1)(b)



Question number in Schedule A to the Notice	Content in provider's response that submission relates to	Submission Category	Specific Reason
--	--	----------------------------	------------------------

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



From: s 47F [redacted]@snapchat.com>
Sent: Friday, 23 January 2026 9:08 PM
To: Social Media Minimum Age Restrictions
Cc: s 47F [redacted]@snap.com; s 47F [redacted]@snapchat.com; s 47F [redacted]@snap.com; Julie Inman Grant
Subject: Re: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]

Received, thank you.

s 47F [redacted]

s 22



From: s 47F @snapchat.com>
Sent: Tuesday, 27 January 2026 2:53 PM
To: Social Media Minimum Age Restrictions
Subject: Re: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]

Follow Up Flag: Follow up
Flag Status: Flagged

Dear SMAR team

Could I please have a quick call with someone from the team to discuss this notice, and particularly the due date for Snap's response.

Thanks
s 47F

s 22



From: s 47F @snapchat.com>
Sent: Tuesday, 27 January 2026 4:42 PM
To: Social Media Minimum Age Restrictions
Subject: Re: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]

Dear SMAR team,

Thank you, s 22 for the call today.

In response to paragraph 14 of the covering letter to the notice, Snap respectfully seeks an extension to the due date for responding to the questions in the notice for the following reasons:

- We do not believe that a three-week timeframe provides adequate time to respond to the volume and complexity of the questions in the notice. The notice comprises five pages of questions, totalling more than 50 questions including sub-questions, and is one of the most comprehensive we have received from eSafety. Many of these questions are complex and/or open-ended rather than “yes/no” questions, requiring detailed consideration. Other questions seek new metrics and data that require internal validation processes. In addition, Snap anticipates making submissions for non-disclosure in respect of certain responses, which will require further work.
- We are also concerned that a short three-week timeframe may adversely impact Snap’s ongoing implementation of the SMAR. Many of the questions are highly technical in nature, and the personnel best placed to prepare Snap’s responses are the same individuals currently focused on our important implementation efforts. Diverting these resources at a critical time—less than two months from the commencement of the highly novel SMAR law—creates implementation risk. A longer response timeframe would better enable Snap to manage both priorities effectively.
- Due to the lean nature of Snap’s local team, which is significantly smaller than those of our competitors, the team preparing the responses to this notice is also responsible for responding to other concurrent information requests. This includes preparation of Snap’s third BOSE periodic report on CSEA and related harms, due on 2 March, as well as anticipated ongoing monthly reporting obligations under the SMAR. These overlapping requirements have further stretched available resources.

As you know, Snap is fully focused on complying with the SMAR and on providing comprehensive and high-quality responses to eSafety’s information requests. While we have already commenced preparations for responding to the notice, we respectfully request an extension of three weeks, until **COB (AEDT) 6 March 2026**. This would provide us a total of six weeks to respond, which we consider reasonable and consistent with comparable reporting timeframes in Australia and internationally (for example, we note that eSafety has provided Snap and other platforms 2 months to prepare our BOSE periodic reports, a process of similar complexity).

I would be pleased to discuss this request further, or otherwise look forward to your response.

Kind regards

S
47F

--

s 47F

Snap Inc.

M: s 47F

E: s [@snapchat.com](mailto:s@snapchat.com)

Snapchat: s 47F

s 22

From: s 47F @snapchat.com>
Sent: Friday, 30 January 2026 6:06 PM
To: Social Media Minimum Age Restrictions
Cc: s 47F @snapchat.com; s 47F @snap.com
Subject: Re: Extension request for 20260123 – SMAR – Snapchat – 63G
[SEC=OFFICIAL:Sensitive]

Hi s 22

Received, thank you. Many thanks for your understanding.

s 47F

s 22



From: Social Media Minimum Age Restrictions
Sent: Thursday, 11 December 2025 7:01 PM
To: s 47F@tglaw.com.au; s 47F@tglaw.com.au
Cc: s 47F@x.com; s 47F@x.com; s 47F@x.com; s 47F@x.com
Subject: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]
Attachments: 20251211 – SMAR – X – 63G.pdf; Attachment A - Submissions for non-disclosure December 2025 - X.pdf

OFFICIAL

Dear s 47F


Please find attached a Notice given by the eSafety Commissioner under s 63G(3) of the Online Safety Act 2021 (Cth) and Attachment A – Submissions for non-disclosure.


If you have any questions about this Notice, please contact the Social Media Age Restrictions team at s 47E(d)@esafety.gov.au.

We would welcome confirmation of receipt at your earliest convenience.

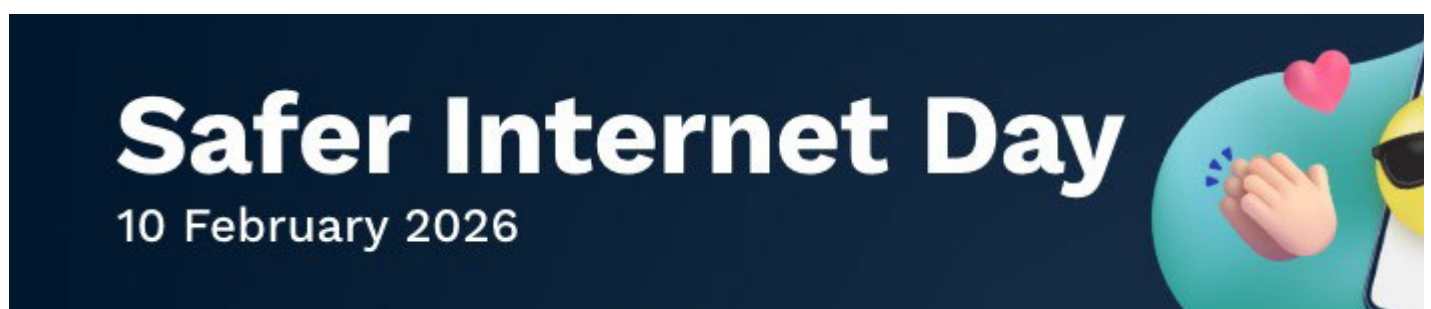
Kind regards

s 22
s 22, Industry Compliance & Enforcement

 s 22

 s 22

Executive Assistant: s 22@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.



11 December 2025

X Corp.

Attention: s 47F and s 47F
Thomson Geer

By email: s @tqlaw.com.au; s 47F @tqlaw.com.au
cc: s 47F @x.com; s @x.com; s 47F @x.com; s 47F @x.com;

Our Reference: 20251211 – SMAR – X – 63G

Notice requiring you to provide information

1. The eSafety Commissioner (**Commissioner**) is required to monitor and promote compliance with the *Online Safety Act 2021* (Cth) (**the Act**), including the social media minimum obligation in s 63D of the Act.
2. Section 63D states that a provider of an age-restricted social media platform must take reasonable steps to prevent age-restricted users (that is, an Australian child who has not reached 16 years) from having accounts with the age-restricted social media platform.
3. Failure to comply with s 63D could result in the commencement of civil penalty proceedings for a civil penalty order of up to AU\$49.5 million for a single contravention by a body corporate, or other action as determined by the Commissioner.
4. In order to monitor a provider's compliance with s 63D, the Commissioner can require the production of information relevant to a provider's compliance with s 63D (s 63G(3)).
5. Please see **enclosed** a notice given to X Corp. under s 63G(3) (**the Notice**) requiring you to provide information relevant to your compliance with s 63D in respect of X.

Power to give the Notice

6. Division 4 of Part 4A of the Act gives the Commissioner the power to, by written notice, require a person to give information relevant to their compliance with s 63D where the Commissioner believes on reasonable grounds that:
 - (a) the person is a provider of an age-restricted social media platform; and
 - (b) the person has information relevant to the person's compliance with s 63D.

Basis for giving the Notice

7. I give the Notice to you on the basis that I believe on reasonable grounds that:
 - (a) X Corp. is the provider of X; and

- (b) X is an age-restricted social media platform; and
- (c) X Corp. has information relevant to its compliance with s 63D in respect of X.

Required action

8. The Notice requires you to provide the information specified in Schedule A to the Notice in the manner and form prescribed at Schedule A to the Notice to the office of the eSafety Commissioner (**eSafety**) by **1:00pm AEDT on 18 December 2025**.
9. The Notice requires you to provide the information specified in Schedule B to the Notice in the manner and form prescribed at Schedule B to the Notice to eSafety by **1pm AEDT on 12 January 2026**.

Failure to comply with the Notice

10. X Corp. must comply with a requirement under s 63G to the extent that it is capable of doing so (s 63H).
11. Failure to comply with the Notice is a contravention of s 63H and could result in the commencement of civil penalty proceedings for a civil penalty order of up to AU\$825,000 for a single contravention by a body corporate, or other action as determined by the Commissioner.

Extension of time to comply

12. In establishing the due dates for the information specified in Schedules A and B to the Notice, eSafety has had regard to feedback from X Corp. received on 10 December 2025 in response to eSafety's letter sent on 8 December 2025.
13. This feedback indicated that providers may not be capable of providing all of the information sought by eSafety by 18 December 2025. Accordingly, eSafety has separated the information sought into two schedules, with minimal information required to be provided by 18 December 2025 and the remaining information required to be provided by 12 January 2026.
14. As a result, eSafety is not inclined to grant additional requests for extension unless a provider can substantiate exceptional circumstances.
15. If X Corp. requires additional time to comply with the Notice, please contact the Social Media Age Restrictions team by email at s 47E(d) _____@esafety.gov.au by **1:00pm AEDT on 16 December 2025**. Please provide reasons for why you are seeking an extension of time.
16. The Notice due dates continue to apply unless eSafety confirms an extension is granted.



Confidentiality of the Notice

17. The Notice and its contents should be kept confidential unless eSafety otherwise agrees in writing.
18. You may share the Notice for the purpose of obtaining legal advice should you wish to do so.

Confidentiality of compelled information and Commissioner's disclosure powers

19. The Commissioner has disclosure powers under Part 15 of the Act. The Commissioner may disclose information obtained under this Notice, including to the Minister for Communications (s 208), certain authorities (s 212), and to the general public (e.g. s 217).
20. Please complete the **enclosed** disclosure of information template if you wish to provide reasons why particular information should not be disclosed.

Review rights

21. The decision to give you the Notice is not a reviewable decision under s 220 of the Act. As such, it is not subject to internal review or external merits review by the Administrative Review Tribunal.
22. You may be able to seek judicial review of the Notice. Judicial review does not consider the merits of the decision to give you the Notice, it considers the legality of the decision.
23. If you have any questions about this Notice, please contact the Social Media Age Restrictions team at [s 47E\(d\)@esafety.gov.au](mailto:s 47E(d)@esafety.gov.au).

A handwritten signature in blue ink that reads "Julie Inman Grant".

Julie Inman Grant

eSafety Commissioner

Attachment: Notice under s 63G(3)

Disclosure of information template

NOTICE REQUIRING YOU TO PROVIDE INFORMATION

(under s 63G(3) of the *Online Safety Act 2021* (Cth))

To: X Corp.

By email: s [REDACTED] [@tqlaw.com.au](mailto:[REDACTED]@tqlaw.com.au); s 47F [REDACTED] [@tqlaw.com.au](mailto:[REDACTED]@tqlaw.com.au)

cc: s 47F [REDACTED] [@x.com](mailto:[REDACTED]@x.com); s [REDACTED] [@x.com](mailto:[REDACTED]@x.com); s 47F [REDACTED] [@x.com](mailto:[REDACTED]@x.com); s 47F [REDACTED] [@x.com](mailto:[REDACTED]@x.com)

1. This notice (**the Notice**) is given to you under s 63G(3) of the *Online Safety Act 2021* (Cth) (**the Act**) and requires you to provide:
 - a. the information specified in Schedule A to the Notice in the manner and form specified in Schedule A to the Notice by **1:00pm AEDT on 18 December 2025** and
 - b. the information specified in Schedule B to the Notice in the manner and form specified in Schedule B to the Notice by **1:00pm AEDT on 12 January 2025**to the extent that you are capable of doing so.
2. I am giving you the Notice because I am satisfied that:
 1. Section 63G(3) authorises the eSafety Commissioner (**Commissioner**) to give a written notice to a person to whom s 63G applies requiring them to give information to the Commissioner relevant to the person's compliance with s 63D of the Act.
 2. The conditions for giving the Notice are met because I believe on reasonable grounds that:
 - (a) X Corp. is the provider of X; and
 - (b) X is an age-restricted social media platform; and
 - (c) X Corp. has information relevant to its compliance with s 63D in respect of X.

False or misleading information

3. Giving false or misleading information to eSafety is an offence under the *Criminal Code Act 1995* (Cth).

Failure to comply with the Notice

4. You must comply with a requirement under the Notice to the extent you are capable of doing so.
5. Failure to comply with the Notice could result in the commencement of civil penalty proceedings for a civil penalty order of up to AU\$825,000, or other action as determined by the Commissioner.

Confidentiality of the Notice

6. The Notice and its contents should be kept confidential unless eSafety otherwise agrees in writing.
7. You may share the Notice for the purpose of obtaining legal advice should you wish to do so.

Commissioner's disclosure powers

8. The Commissioner has disclosure powers under Part 15 of the Act. The Commissioner may disclose information obtained under this Notice, including to the Minister for Communications (s 208), certain authorities (s 212), and to the general public (e.g. s 217).



Julie Inman Grant

eSafety Commissioner



SCHEDULE A – INFORMATION REQUIRED TO BE PROVIDED BY 1PM AEDT ON 18 DECEMBER 2025

The information you must provide is as follows:

s 47E(d)

This information must be provided in the following manner and form:

- The information is to be provided in a PDF and sent to s 47E(d) [@esafety.gov.au](mailto:s 47E(d)@esafety.gov.au).
- Where the information sought is a number and the number is zero, you must provide the number and not respond with 'not applicable' or 'N/A'. Additional context may also be provided.
- Where X Corp. considers it is not capable of providing the required information, X Corp. should include statements explaining the basis on which it has determined it is not capable of providing the information.

The following definition applies in this schedule:

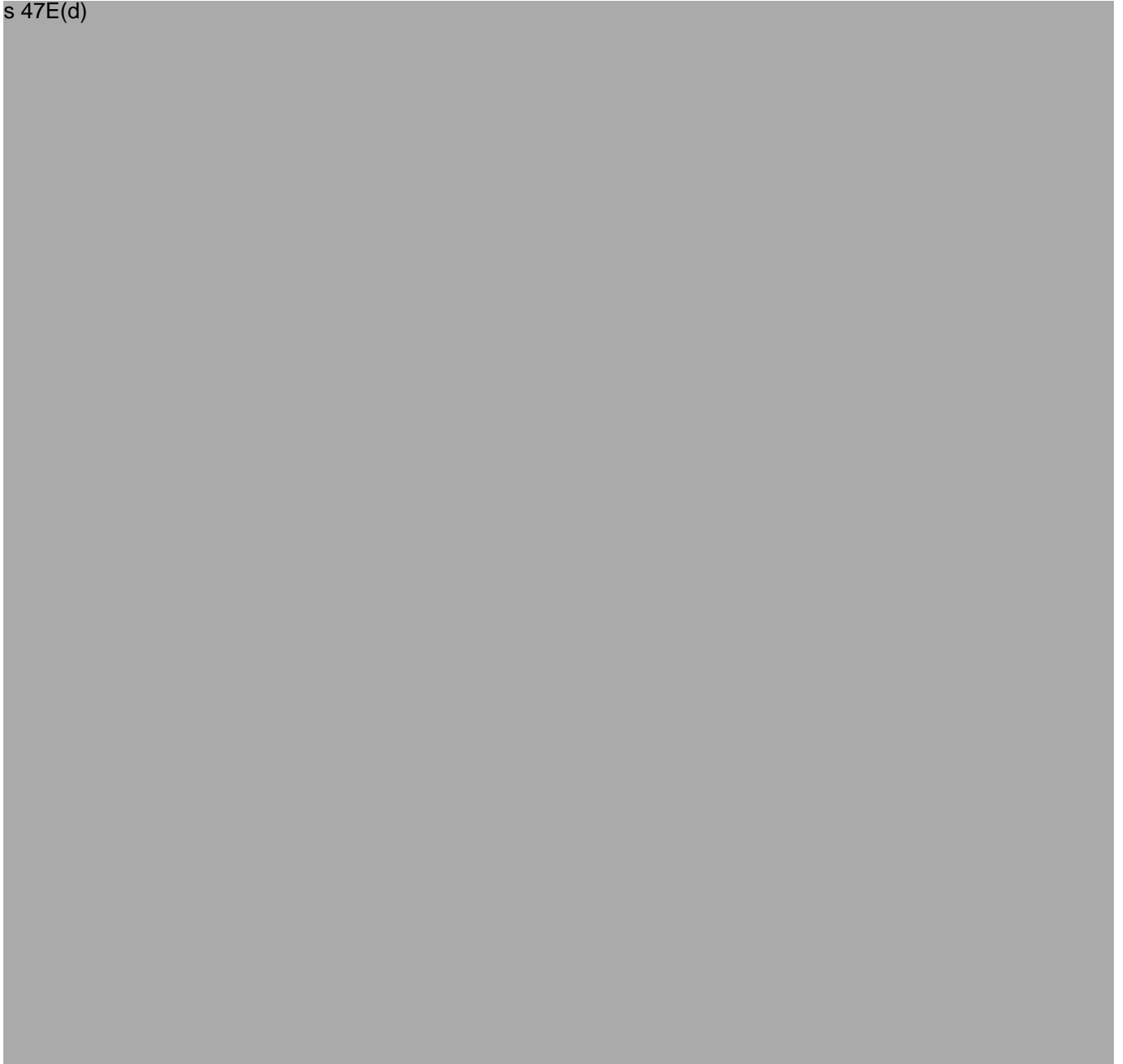
Age-restricted user means an Australian child who has not reached 16 years. For the avoidance of doubt, this includes Australian children who are under 13 years of age.



**SCHEDULE B – INFORMATION REQUIRED TO BE PROVIDED BY 1PM AEDT
ON 12 JANUARY 2026**

The information you must provide is as follows:

s 47E(d)





This information must be provided in the following manner and form:

- The information is to be provided in a PDF and sent to s 47E(d) [REDACTED] [@esafety.gov.au](mailto:[REDACTED]@esafety.gov.au).
- Where the information sought is a number and the number is zero, you must provide the number and not respond with 'not applicable' or 'N/A'. Additional context may also be provided.
- Where X Corp. considers it is not capable of providing the required information, X Corp. should include statements explaining the basis on which it has determined it is not capable of providing the information.

The following definitions apply in this schedule:

Age-restricted user means an Australian child who has not reached 16 years. For the avoidance of doubt, this includes Australian children who are under 13 years of age

Confidentiality and the eSafety Commissioner's disclosure powers

Confidentiality

1. You are required to provide the information sought in the s 63G notice. The fact that certain information is confidential is not generally an excuse from complying with a s 63G notice.
2. Information obtained under a s 63G notice is not automatically confidential. For example, if eSafety receives information that is already in the public domain, the fact that the information was received in response to a s 63G notice does not mean the information becomes confidential.

Disclosure of compelled information

3. The eSafety Commissioner (**Commissioner**) may disclose information obtained under a s 63G notice in certain circumstances, including to the Minister for Communications (s 208 of the *Online Safety Act 2021* (Cth) (**the Act**)), certain authorities¹ (s 212) and to the general public² (e.g. s 217).
4. In the course of considering disclosure of compelled information, eSafety will take into account the objectives of the Act and the relevant functions of the Commissioner in s 27 of the Act, including:
 - to promote online safety for Australians;
 - to support and encourage the implementation of measures to improve online safety for Australians;
 - to collect, analyse, interpret and disseminate information relating to online safety for Australians;
 - to publish (whether on the internet or otherwise) reports and papers relating to online safety for Australians;
 - to advise and give the Minister reports about online safety for Australians; and
 - to monitor and promote compliance with the Act.
5. eSafety recognises that some information may not be suitable for disclosure and invites you to make submissions about the disclosure of information provided in response to the s 63G notice by the due date of the s 63G notice.
6. Any submissions that you provide are voluntary and do not form part of your obligation to respond to the s 63G notice. Your submissions will not be disclosed, unless required by another legal process.
7. eSafety does not intend to disclose information obtained under a s 63G notice where it is satisfied that:
 - (a) the information falls into one of the categories in Table 1 below; and
 - (b) your reasons demonstrate that you would be, or would reasonably be likely to be, adversely affected if the information were disclosed. It is not sufficient to simply assert that disclosure would fall into one of the categories in Table 1.

¹ The Commissioner may disclose information to certain authorities (including the Office of the Australian Information Commissioner) if the Commissioner is satisfied that the information will enable or assist the authority to perform or exercise any of the authority's functions or powers.

² The Commissioner may disclose information that relates to the affairs of a person if the person has consent to the disclosure and the disclosure is in accordance with that consent (s 215 of the OSA); the Commissioner may disclose information if it is already publicly available (s 216 of the OSA); the Commissioner may disclose (a) summaries of de-identified information; and (b) statistics derived from de-identified information (s 217 of the OSA).

Table 1: Categories of information that eSafety will consider not publishing

Category of information	Includes	Relevant Factors
Commercial in confidence	Trade secrets. Information with commercial value, where that value would be diminished if the information were published.	Matters eSafety will consider include: <ul style="list-style-type: none"> - the extent to which information is already publicly known - measures taken to guard secrecy - the value of the information to its owner and competitors - the effort and money spent by the owner in developing the information - the ease or difficulty with which others might acquire or duplicate the information - the commercial harm that could occur from publication - other relevant information or submissions raised.
Other business information that would be unreasonable to publish	Information about an individual's business or professional affairs, or information about the business, commercial or financial affairs of an organisation or undertaking (business information) that would unreasonably affect that person adversely in respect of their lawful business or professional affairs or that organisation or undertaking in respect of its lawful business, commercial or financial affairs.	Matters eSafety will consider include: <ul style="list-style-type: none"> - whether the information is business information - how the publication of the information could have an unreasonable adverse impact on the individual or business.
Law enforcement and public safety	Information that could affect law enforcement or public safety, including disclosing methods or procedures for preventing, detecting, investigating, or dealing with matters arising out of, breaches or evasions of the law. Information that could assist individuals and groups from deliberately contravening or circumventing safety and security measures.	Matters eSafety will consider include: <ul style="list-style-type: none"> - whether the methods or procedures are publicly known or prevalent across industry. - the level of detriment that is likely to occur from the disclosure of any lawful methods or procedures for investigating, preventing, detecting or dealing with breaches of the law. - how information could assist individuals in contravening company safety policies and interventions and the level of detriment that is likely to occur. Information that eSafety will not normally publish: <ul style="list-style-type: none"> - Specific indicators, for example behavioural indicators (new account contacting multiple children) that might companies use, or technical indicators (e.g. device and IP addresses); - Language/terms searched for; - Detailed explanations or information on how technologies work and their weaknesses/vulnerabilities; - "New technology" that is not currently in the public domain.
Personal information	Information about a natural person.	Matters eSafety will consider: <ul style="list-style-type: none"> - whether the information is about an identified individual or an individual who is reasonably identifiable from the summary or other sources - whether the information in the summary could be de-identified so that is no longer about an identifiable individual or individual who is reasonably identifiable.

Table 2: Submission by provider

Please provide your submissions in the below table. It will assist if you provide submissions in the following format:

- 1) Question # in Schedules A and B to the Notice;
- 2) Specific content in provider’s response that submission relates to;
- 3) Which ‘**Category of information**’ in Table 1 the submission relates to (you may identify more than one where relevant); and
- 4) Specific reasons that demonstrate that you would be, or would be reasonably likely to be, adversely affected if the information were disclosed (carefully consider ‘**relevant factors**’ in Table 1).

Question number in Schedule A to the Notice	Content in provider’s response that submission relates to	Submission Category	Specific Reason
6a.	<i>E.g. “Provider does xyz on the service”</i>	<i>E,g, Law enforcement and public safety</i>	<i>Specific reason explaining why disclosure would be likely to cause any real, significant or material harm – please carefully consider relevant factors in Table 1.</i>

Question number in Schedule B to the Notice	Content in provider’s response that submission relates to	Submission Category	Specific Reason
6a.	<i>E.g. “Provider does xyz on the service”</i>	<i>E,g, Law enforcement and public safety</i>	<i>Specific reason explaining why disclosure would be likely to cause any real, significant or material harm – please carefully consider relevant factors in Table 1.</i>

From: Social Media Minimum Age Restrictions
Sent: Monday, 15 December 2025 3:56 PM
To: s 47F@tglaw.com.au; s 47F@tglaw.com.au
Cc: s 47F@x.com; s 47F@x.com; s 47F@x.com; s 47F@x.ai; Social Media Minimum Age Restrictions
Subject: RE: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]
Attachments: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL]

OFFICIAL

Dear s 47F

We are reaching out regarding our email of 11 December (below and **attached**) attaching a Notice given by the eSafety Commissioner under s 63G(3) of the Online Safety Act 2021.

We would be grateful if you could confirm receipt. If you have any questions about the Notice, please contact the Social Media Age Restrictions team at s 47E(d) @esafety.gov.au.

Kind regards

Social Media Age Restrictions team



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.

From: Social Media Minimum Age Restrictions
Sent: Wednesday, 17 December 2025 3:19 PM
To: s 47F@tglaw.com.au; s 47F@tglaw.com.au
Cc: s 47F@x.ai; s 47F@x.com; s 47F@x.com; s 47F@x.com; Social Media
Minimum Age Restrictions
Subject: Reminder: Information required under s 63G notice due tomorrow by 1PM AEDT
[SEC=OFFICIAL]

OFFICIAL

Dear X Corp.

This is a reminder that the information set out in Schedule A to the notice given to you by the eSafety Commissioner on 11 December 2025 under s 63G of the *Online Safety Act 2021* (Cth) is due **tomorrow, 18 December 2025 by 1pm AEDT**.

Please ensure the information is complete and submitted in the manner and form required by the deadline to avoid any compliance issues.

Kind regards

Social Media Age Restriction Team



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.

From: Social Media Minimum Age Restrictions
Sent: Thursday, 18 December 2025 11:13 AM
To: s 47F
Cc: s 47F@tglaw.com.au; s 47F@tglaw.com.au; s 47F@x.com; s 47F@x.com; s 47F@x.com; Social Media Minimum Age Restrictions
Subject: RE: Reminder: Information required under s 63G notice due tomorrow by 1PM AEDT [SEC=OFFICIAL]

OFFICIAL

Dear X Corp.

We confirm receipt.

Kind regards

Social Media Age Restriction Team



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.

From: Social Media Minimum Age Restrictions
Sent: Monday, 12 January 2026 9:59 AM
To: s 47F
Cc: s 47F@tglaw.com.au; s 47F@tglaw.com.au; s 47F; s 47F; Social Media Minimum Age Restrictions
Subject: RE: Reminder: Information required under s 63G notice due tomorrow by 1PM AEDT [SEC=OFFICIAL]

OFFICIAL

Dear X Corp.

We confirm receipt.

Kind regards

Social Media Age Restrictions Team



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.

s 22

From: s 47F [redacted]@x.com>
Sent: Tuesday, 2 December 2025 9:39 PM
To: eSafety Industry Supervision
Cc: s 47F [redacted]@x.com
Subject: Re: Request to confirm X Corp links for eSafety guide update [SEC=OFFICIAL]

Dear eSafety Industry Supervision,

Thank you for your questions.

Dedicated resources for X users in Australia are consolidated in our Help Centre article at the following link: <https://help.x.com/en/rules-and-policies/australia-resources>. This Help Centre article will be updated from 10 December 2025 to communicate the changes implemented by X Corp. to comply with the social media minimum age obligation as currently set out in Part 4A of the Online Safety Act 2021.

We confirm the following links are correct as of today:

- To report an underage user: <https://help.x.com/en/forms/safety-and-sensitive-content/underage-user>
- Help On Your Suspended Account resources including reporting forms <https://help.x.com/en/managing-your-account/suspended-x-accounts>

We shall update you if there are any updates to these links on account of the changes implemented by X Corp. to comply with the social media minimum age obligation.

Thank you.

Kind regards,
s 47F [redacted]

From: s 47F @tglaw.com.au>
Sent: Wednesday, 10 December 2025 11:23 AM
To: s 22 ; Social Media Minimum Age Restrictions
Cc: s 22 ; eSafety Industry Supervision; s 47F ; s 47F ; s 47F
Subject: X Corp. - Intention to give s 63G notices on 11 December 2025 [TGLAW-Legal.FID3298795]
Attachments: 2025.12.10 - Letter to eSafety (s 63G notice).pdf

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

[Confidential]

Dear s 22

Please see **attached** correspondence.

Kind regards

s 47F

| Lawyer

Thomson Geer

s 47F

Level 23, Rialto South Tower, 525 Collins Street, Melbourne VIC 3000 Australia

s 47F @tglaw.com.au | tglaw.com.au

[Advice](#) | [Transactions](#) | [Disputes](#)

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#####

Level 23, Rialto South Tower
525 Collins Street
Melbourne VIC 3000 Australia

GPO Box 375 Melbourne VIC 3001

T +61 3 8080 3500
F +61 3 8080 3599

10 December 2025

s 22
General Manager, Regulatory Operations
Office of the eSafety Commissioner
PO Box Q500
Queen Victoria Building NSW 1230

Dear s 22

Intention to give section 63G notice on 11 December 2025

We act for X Corp..

We refer to your letter dated 8 December 2025 regarding the eSafety Commissioner's intention to give a written notice (**Notice**) to our client under section 63G of the *Online Safety Act 2021* (Cth) (**Act**).

Thank you for informing our client of the Commissioner's intention to issue the Notice. Our client appreciates the transparency and remains committed to constructive engagement. This letter is therefore sent in the spirit of cooperation.

We understand the Commissioner intends to issue the Notice on Thursday, 11 December 2025 and will require the information set out in the Notice by 1pm (AEDT) on Thursday, 18 December 2025.

While we recognise the importance of the Commissioner's role in assessing compliance with section 63D of the Act, the proposed compliance period of less than five business days does not provide our client with a realistic opportunity to identify, collect, review, and produce the information requested. As a global platform with operations spanning multiple jurisdictions, a substantial amount of coordination work is required in order to retrieve accurate information and data.

In short, our client is simply not capable of complying with the Notice in the timeframe currently proposed.

In order to comply with the Notice, our client would need at least 28 days - which we consider a reasonable and appropriate period particularly in light of the intervening holiday periods in the United States and elsewhere.

We note section 63H of the Act requires a person to comply with a requirement under section 63G to the extent that person is capable of doing so. The Commissioner is now on notice that our client will be incapable of complying with the Notice within the proposed timeframe. In those circumstances, it would be inappropriate to issue a notice to our client with a deadline that the Commissioner now knows our client is not capable of complying with.

Our client is committed to cooperating with the Commissioner and responding to the Notice.

To facilitate this, we request that the compliance deadline be extended to **8 January 2026**.

For completeness, our client reserves its rights in relation to the Notice, including the right to rely on this correspondence in any proceedings.

Yours faithfully
Thomson Geer

s 47F



Partner

s 47F



From: s 47F @tglaw.com.au>
Sent: Monday, 15 December 2025 8:00 PM
To: Social Media Minimum Age Restrictions
Cc: s 47F s 47F @x.com; s 47F @x.com; s 47F @x.com; s 47F @x.ai
Subject: RE: Section 63G(3) Notice from the eSafety Commissioner [SEC=OFFICIAL] [TGLAW-Legal.FID3298795]

[Confidential]

Dear Social Media Age Restrictions team

We acknowledge receipt.

Kind regards

s 47F

| Lawyer

Thomson Geer

s 47F

Level 23, Rialto South Tower, 525 Collins Street, Melbourne VIC 3000 Australia

s 47F @tglaw.com.au | tglaw.com.au

Advice | Transactions | Disputes

Our offices will be closed from COB Tuesday 23 December 2025 and will reopen on Tuesday 6 January 2026. However, if you require urgent prepublication advice or urgent advice generally, please email prepub@tglaw.com.au. The prepub email address is being constantly monitored. If you need to speak with me, please call my mobile as set out above.

s 22



From: s 47F [redacted]@x.ai>
Sent: Thursday, 18 December 2025 11:00 AM
To: Social Media Minimum Age Restrictions
Cc: s 47F@tglaw.com.au; s 47F [redacted]@tglaw.com.au; s 47F [redacted]@x.com; s 47F [redacted]@x.com;
s 47F [redacted]@x.com
Subject: Re: Reminder: Information required under s 63G notice due tomorrow by 1PM AEDT
[SEC=OFFICIAL]
Attachments: eSafety Section 63G notice - X Corp. - Schedule A response to eSafety.pdf

Dear eSafety

Please find attached the response from X Corp. to the notice given under s 63G(3) of the Online Safety Act 2021 (Cth), providing the information specified in Schedule A to the Notice.

On a strictly non-precedential basis, we do not intend to seek non-disclosure of any particular information supplied in response to Schedule A of the Notice.

Yours faithfully

X Corp.

s 22



X Corp.



865 FM 1209, Building 2
Bastrop, TX 78602

eSafety Commissioner

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

18 December 2025

Dear eSafety Commissioner

Notice requiring X Corp. to provide information

We refer to the notice (the “**Notice**”) given to X Corp. under s 63G(3) of the Online Safety Act 2021 (Cth) (the “**Act**”) requiring X Corp. to provide (inter alia) the information specified in Schedule A to the Notice in the manner and form specified in Schedule A to the Notice by 1:00pm AEDT on 18 December 2025.

Please refer to the Annexure to this letter, in which we have provided the information specified in Schedule A to the Notice.

On a strictly non-precedential basis, we do not intend to seek non-disclosure of any particular information supplied in response to Schedule A of the Notice.

Yours faithfully

X Corp.

ANNEXURE
SCHEDULE A – INFORMATION REQUIRED TO BE PROVIDED BY 1PM AEDT ON 18 DECEMBER 2025

No.	Information requested	X Corp. Response
1.	s 47E(d)	s 47G(1)(a), s 47G(1)(b) [Redacted] s
2.		s 47G(1)(a), s 47G(1)(b) [Redacted]
		s 47G(1)(a), s 47G(1)(b) [Redacted]

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

		s 47G(1)(a), s 47G(1)(b)
3.		s 47E(d)
4.		

From: s 47F [redacted]@x.ai>
Sent: Monday, 12 January 2026 12:03 AM
To: Social Media Minimum Age Restrictions
Cc: s 47F [redacted]@tglaw.com.au; s 47F [redacted]@tglaw.com.au; s 47F [redacted]; s 47F [redacted]
Subject: Re: Reminder: Information required under s 63G notice due tomorrow by 1PM AEDT [SEC=OFFICIAL]
Attachments: eSafety Section 63G notice - X Corp. - Schedule B response to eSafety 11 Jan 2026.pdf

Dear eSafety

Please find attached the response from X Corp. to the notice given under s 63G(3) of the Online Safety Act 2021 (Cth), providing the information specified in Schedule B to the Notice.

On a strictly non-precedential basis, we do not intend to seek non-disclosure of any particular information supplied in response to Schedule B of the Notice.

Yours faithfully

X Corp.

s 22



X Corp.



865 FM 1209, Building 2
Bastrop, TX 78602

eSafety Commissioner

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

11 January 2026

Dear eSafety Commissioner

Notice requiring X Corp. to provide information

We refer to the notice (the “**Notice**”) given to X Corp. under s 63G(3) of the Online Safety Act 2021 (Cth) (the “**Act**”) requiring X Corp. to provide (inter alia) the information specified in Schedule B to the Notice in the manner and form specified in Schedule B to the Notice by 1:00pm AEDT on 12 January 2026.

Please refer to the Annexure to this letter, in which we have provided the information specified in Schedule B to the Notice.

On a strictly non-precedential basis, we do not intend to seek non-disclosure of any particular information supplied in response to Schedule B of the Notice.

Yours faithfully

X Corp.

ANNEXURE
SCHEDULE B – INFORMATION REQUIRED TO BE PROVIDED BY 1PM AEDT ON 12 JANUARY 2026

No.	Question	X Corp. Response
1.	s 47E(d)	s 47E(d), s 47G(1)(a), s 47G(1)(b)
2.		

	s 47E(d)	s 47E(d)
3.		
4.		s 47E(d), s 47G(1)(a), s 47G(1)(b)
5.		