



World Council
For Health
Australia

World Council for Health
Country Council: Australia

**Submission - Online Safety Amendment (Social
Media Minimum Age) Bill 2024 [Provisions]**

22 November 2024



Introduction

World Council for Health is a broad, grassroots, expert-led initiative to work together to empower global and community health. We are governed by seven principles:

1. We act in honour and do no harm
2. We are free beings with free will
3. We are part of nature
4. We are spiritual and thrive when life has meaning and purpose
5. We thrive together and value our diverse community
6. We value different perspectives
7. We use technology with discernment

With courage we do not tolerate the violation of people's inalienable rights and freedoms.

With courage we do not tolerate profit, power and influence coming before the wellbeing of people and planet.

The freedoms we speak of are freedom of speech, freedom of movement, freedom of assembly, the right to free and informed consent, the right to privacy, the right to body integrity, and that everyone is innocent until proven guilty.

The Australian Country Council of the World Council for Health is led by [Lucinda van Buuren](#), [Professor Ian Brighthope](#), [Dr Melissa McCann](#), [Dr David Robbolini](#), [Ian Bell](#), [Katie Ashby-Koppens](#) and [Michelle Bradshaw](#).

World Council for Health Australia welcomes the opportunity to provide a submission to the Environment and Communications Legislation Committee for the [Online Safety Amendment \(Social Media Minimum Age\) Bill 2024 \[Provisions\]](#).

Following are our submissions on the statements that we strongly suggest must be considered by the Committee given their likely impact to compromise and undermine parental rights and privacy risks for Australians.

1. Overview

- 1.1. We at WCH Australia, are deeply concerned about the proposed Online Safety Amendment (Social Media Minimum Age) Bill 2024 [Provisions] and urge the Environment and Communications Legislation Committee to reconsider and withdraw this Bill.
- 1.2. There are some prima facie concerns we have with the Bill, namely:
 - 1.2.1. There is a Lack of Detail on How Age Verification will occur: The government has not provided adequate information on how identity and age verification will be conducted for social media users over 16, raising significant concerns and questions regarding individual privacy and data security.
 - 1.2.2. The Legislation for World-First is Premature: Swiftly entering this bill through the parliament without full disclosure of its mechanisms and then failing to provide adequate time for consideration through submissions, (24 hours) obstructs transparency and ultimately obstructs carefully considered and informed public participation in the decision-making process which as a United Nations, member state delegate, we are obligated to uphold.
 - 1.2.3. The Bill Tramples Parental Rights: Parenting children is the parents right and this bill could override parental discretion and responsibility in managing their children's online presence.
 - 1.2.4. Privacy Risks: Age verification could lead to increased data collection, with significant privacy implications. Social Isolation: Children have been utilising social media from the age of thirteen and changing this age to now sixteen has the potential to isolate teenagers who rely on social media for social interaction and support.
- 1.3. A suggested, more favourable alternative to this bill, would be to focus on digital literacy programs and safer platform features.

- 1.4. We strenuously oppose the Social Media Minimum Age Bill 2024 and urge policymakers to reconsider the very premise of the legislation, let alone what has been included in the Bill.
- 1.5. While the Bill is intended to protect young Australians during critical stages of their development, we believe its potential consequences will cause greater harm, particularly regarding privacy, freedom of expression, and the introduction of digital identification systems. All of which require careful scrutiny.
- 1.6. We expand on our concerns above using the following structure:
 - 1.6.1. Overview: WCH strenuously opposes the Bill
 - 1.6.2. The Bill has been tabled in an undemocratic and unconstitutional way
 - 1.6.3. The Government is inserting itself into the family unit: it has no Parental Role
 - 1.6.4. Children have Rights Too
 - 1.6.5. This will do More Harm than Good
 - 1.6.6. Don't Dictate: Educate
 - 1.6.7. Big Tech Delegated Control
 - 1.6.8. Privacy Under Threat
 - 1.6.9. Gateway to Digital ID enslavement for ALL Australians
 - 1.6.10. Surveillance - Pressure from unelected global organisations such as the United Nations, World Health Organisation (WHO) and their partner the World Economic Forum (WEF)

2. The Bill has been tabled in an undemocratic and unconstitutional way allowing insufficient time for public consultation

- 2.1. The Bill was first tabled in the House of Representatives on 21 November 2024.
- 2.2. The opportunity for the people of Australia to provide feedback was just over 24 hours, assuming public submissions close 11.59pm 22 November 2024, with the Committee to supply the report by 24 November 2024.
- 2.3. The concept of the Bill has been floated by Labor for some time. There is no emergency. So why the need for urgency and apparent secrecy for a new world-leading legislation, that the Labor Prime Minister says he wants to make sure “we’ve got it right”.
- 2.4. On 1 May 2024, the Labor Government announced an age assurance technology trial to examine options to protect children from harmful online content such as pornography and other age-restricted services, as well as harms on social media.
- 2.5. On 7 November 2024, Labor Prime Minister Anthony Albanese announced plans for the Bill.
- 2.6. The wording of the Bill was made available three weeks later with only 24 hours for public feedback.
- 2.7. This rush suggests insufficient time to fully assess the bill’s long-term implications, leaving many questions about its implementation unanswered.
- 2.8. Such conduct and behaviour allows no opportunity for Australians to fully consider and grasp the terms of the Bill and what is being proposed.
- 2.9. The haste with which the legislation is being pushed through suggests that lawmakers are prioritising speed over thorough consideration, this is particularly alarming when it is world first reliant on entirely new technology.
- 2.10. It is therefore under the reservation of insufficient time we make this submission without prejudice to our right to respond further should opportunity be provided.

- 2.11. We also note that this kind of conduct from the government, both Labor and the Coalition will not be forgotten when we head into next year's election.

3. The Government is inserting itself into the family unit: it has no Parental Role

- 3.1. This Bill bypasses parental authority in managing children's online safety.
- 3.2. Parents are the first and most effective line of defence when it comes to monitoring and guiding their children's daily activities.
- 3.3. However, this Bill centralises control in a government-mandated age verification system, undermining the critical role of parents in making decisions about their children's digital lives.
- 3.4. It is not the government's job to parent the children of our nation. Parents do not need to have their authority and their duties undermined in such a way.
- 3.5. The internet is like the new town square, but digital. It is an environment which we all operate and children need to learn about it and learn to operate within it.
- 3.6. We do not say that no protection should be afforded to children on the internet: access to porn and dangerously harmful content should be controlled - however, this is already successfully done under legislation.
- 3.7. We also acknowledge that there is reliable evidence that significant smartphone and social media use has the ability to harm children and youths. WCH Australia would like to see a more considered approach that balances harms with benefits afforded with social media use such as the positives of education and connection.
- 3.8. Further, parents should have the right to choose the social platforms they deem fit and suitable for their individual child and there is already software available for parents to install on their children's devices that will limit their use - in the way the parent decides.
- 3.9. What is proposed is a blanket ban, which we believe will only create greater danger, which we touch on in section 12 below.

3.10. The government's own Safety Commissioner, noted:

"A blanket age ban on social media is like banning kids from the water instead of teaching them how to swim."

3.11. In the same way parents choose to educate their children around water and get swimming lessons, parents should have the right to choose how they educate their children about social media.

4. Children have Rights too!

4.1. Children have rights too! There are 54 articles (or 'rights') that make up the international Convention on the Rights of the Child, of most relevance here is:

Article 12 – Children have the right to their opinion and can say what they think should happen.

Article 13 – Children have the right to freedom of expression and can seek, receive and impart information and ideas of all kinds.

4.2. This new Bill will tread all over those rights!

4.3. Children's voices have a right to be heard.

4.4. This Bill will silence and censor children and teenagers.

5. This will do More Harm than Good

5.1. Social media is a part of modern day society. It serves as a vital tool for young people to connect, access emotional support, and form communities.

5.2. The Bill's restrictions will isolate teenagers, especially those who rely on online platforms for self-expression and social interaction.

- 5.3. Social media provides critical access to educational resources and mental health support. For instance, platforms like Headspace and Kids Helpline are vital for young people struggling with mental health challenges.
- 5.4. Further, as bullying is a big concern for the government - the social media applications that allow young people still to chat and communicate will be exempt from the legislation, meaning platforms where bullying can still occur will still be available to children.
- 5.5. A blanket ban with no grandfather clause will elevate social media in the minds of children and teenagers and have the very real potential to push social media use in this age cohort underground. Current examples are places such as the dark web, where behaviour and conduct is entirely unmonitored and unregulated - far from the protections intended by the bill.

6. Don't Dictate: Educate

- 6.1. Rather than relying on a blanket age verification system, a more effective solution would focus on digital literacy and equipping young people with the tools to navigate online spaces responsibly.
- 6.2. As eSafety Commissioner Julie Inman Grant suggested, addressing online safety should not be limited to age restrictions, but should also prioritise education:

“Teaching children to navigate these spaces safely is far more effective than just putting up barriers.”
- 6.3. Investing in educational programs and enhancing platform safety features would inform children and better prepare them to handle risks such as cyberbullying and predatory behaviour, while also allowing social media to continue serving its educational, social, and mental health roles.

7. Government Overreach and Empowerment of Big Tech

- 7.1. As with the Communications Legislation Amendment (Combatting Misinformation and Disinformation) Bill 2024, the government is proposing to place policing power in the hands of Big Tech under the threat of fines close to \$50 million for recurring breaches.
- 7.2. This model is also rife with numerous issues because it opens the door to authoritarian control over digital media and speech and will empower Big Tech to become the age police on the government's behalf.

8. Privacy Under Threat

- 8.1. Provisions allowing for the surveillance of online communications violate individual peoples' right to privacy and will create a culture of mistrust as big brother aka Big Tech and Big Government will be watching people.
- 8.2. The collection of sensitive personal data for age verification purposes will be necessary should the Bill have any effect as it intends.
- 8.3. The Bill mandates the creation of systems to verify users' age, which will lead to the collection of vast amounts of personal information, raising risks of data breaches and identity theft.
- 8.4. There are a raft of examples of peoples' personal private information being hacked and leaked. Nothing in the Bill gives any comfort that peoples' privacy will be protected or respected.

9. Gateway to Digital ID enslavement for ALL Australians

- 9.1. A very huge and real concern is the Bill would require all Australians to undergo age verification, raising concerns about privacy and data protection.
- 9.2. Consequently, the digital identification systems could lead to increased surveillance, potentially eroding civil liberties and creating opportunities for state surveillance.

Michael Shellenberger, journalist, called it “a Trojan horse to create digital IDs,” which he argues is a “giant leap into the totalitarian dystopia depicted in 'Black Mirror,' already in place in China.”

10. Surveillance - Pressure from unelected global organisations such as the United Nations, World Health Organisation (WHO) and their partner the World Economic Forum (WEF)

- 10.1. Quite contradictory to the United Nations' 1996 ICCPR's, is the new approach being pressed globally by the United Nations, its health agency the World Health Organisation, organisations that once catered for all the world's nations to come to gather together, discuss common problems, and find shared solutions that benefit all of humanity.
- 10.2. More recently, the United Nations has not been driven by the 193 countries that are called member states for the benefit of member states. Instead, the United Nations has committed itself to more commercial and globalist interests by partnering with the World Economic Forum (WEF) “an international non-governmental organisation, think tank, and lobbying organisation based in Cologny, Canton of Geneva, Switzerland ... founded on 24 January 1971 by German engineer Klaus Schwab.” The WEF and the United Nations "Strategic Partnership Framework" signed 13 June 2019 is to "jointly accelerate the implementation of the 2030 Agenda for Sustainable Development."
- 10.3. Globally there is enormous pressure by international organisations (UN and WHO) and groups such as the WEF to control, survey, track and throttle information.

World Health Organization

- 10.4. If Australia does not reject the World Health Organisation's 2024 International Health Regulations by 19 July 2025, Australia will be required by 19 September 2025 to:

“develop, strengthen and maintain core capacities . . . in relation to . . . surveillance.” (Annex 1, A.2.c.(i)).
- 10.5. The “surveillance” requirement is partially defined in Article 5. The 2024 IHRs need to be read together with the Pandemic Treaty, which is being finalised. Article 5 of the most

recent draft of the Treaty sets forth the “One Health Approach,” which connects and balances human, animal, plant and environmental health, giving a pretext for surveillance on all these fronts.

- 10.6. Barcoding and tracking the citizenry on behalf of an unelected world organisation for the 2030 agenda and the United Nations’ 17 Sustainability Goals is misguided and dangerous, especially when the largest purveyors of mis and dis-information are the government and mainstream media.

11. Conclusion

- 11.1. While the Australian government’s proposed Online Safety Amendment (Social Media Minimum Age) Bill 2024 may seek to address important concerns around online safety, the approach outlined in the bill risks creating many more problems than it solves. The focus on mandatory age verification and the potential for digital identification systems could lead to privacy violations, hinder freedom of expression, and disproportionately impact vulnerable groups and once again transfer incredible power to unelected unaccountable bureaucrats. Instead of relying on this restrictive and potentially harmful system, I urge policymakers to focus on fostering digital literacy, improving platform safety features, and supporting initiatives that promote responsible online behaviour. This will better protect children and young people while preserving privacy, access, and free speech in the digital age.
- 11.2. Thank you for considering these concerns. I strongly urge policymakers to reconsider the bill in its current form. While this issue has been long standing, the sudden urgency to push this legislation through with minimal time for public input is deeply concerning.
- 11.3. World Council for Health Australia thanks the Senate Environment and Communications Legislation Committee for the opportunity to provide a submission on the Online Safety Amendment (Social Media Minimum Age) Bill 2024 [Provisions].