

TRIS NOTIFICATION PROCEDURE

Greek law introducing a minimum age limit for the use of online social networking services

July 2026

Introduction

The Computer & Communications Industry Association (CCIA Europe) welcomes the opportunity to provide its contribution to the [TRIS notification procedure](#) 2026/0226/GR, regarding the Greek draft provisions on the introduction of a minimum age limit for the use of online social networking services (hereinafter the Greek draft law).

Greece aims to strengthen national protections for minors by banning access to online social networking services for minors under fifteen years of age. CCIA Europe supports protecting children and teenagers online, yet national bans create direct legal conflicts. As the European Commission prepares EU-wide social media rules, adding individual national requirements creates unnecessary market friction. European Union law already establishes clear rules to safeguard young users and promote safety on the internet. Unilateral national initiatives fragment the single market, overlap with existing European Union legislation, and ultimately reduce online safety for minors. More concretely, CCIA Europe believes that the Greek draft law proposes national legislation that:

1. Breaches the Digital Services Act
2. Undermines EU regulatory coherence
3. Interferes with children's freedom of expression and information

In light of this, CCIA Europe calls on the European Commission to issue a detailed opinion on the incompatibility of the Greek proposal with EU law and to request Greece to pause its initiative pending ongoing work at EU level.

I. Breach of the Digital Services Act

Harmonised European Union legislation is necessary for a unified single market that protects all citizens equally. Preventing overlaps, duplication, and legal fragmentation avoids business uncertainty, securing a cohesive European approach to protecting minors.

The Greek draft law aims to establish an age limit for the use of online social networking services provided by online platforms in order to restrict access to them by minors who have not yet reached the age of fifteen. However, the Digital Services Act (DSA) already establishes a fully harmonised regulatory framework for intermediary services, containing robust provisions aimed at protecting minors online.¹ It establishes standard EU-wide obligations designed to foster a safe, predictable, and trustworthy digital environment for young users, while balancing fundamental rights under the EU Charter and leaving

¹ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), available [here](#).

breathing room for market innovation.² Additionally, the European Commission's supplementary guidelines on Article 28 DSA dedicated to protecting children online further strengthens this framework.³ To ensure legislative coherence and effective protection, individual Member States are precluded from introducing national rules that overlap with areas regulated by the DSA.⁴ Viewed through this lens, the proposed Greek legislation raises several significant concerns.

First, the scope of this proposal lacks legal clarity because it conflicts with definitions under EU law. Article 1, for instance, refers to "online social networking services provided by online platforms." Under both the DSA and Digital Markets Act (DMA), an "online platform" is a distinct category of digital service rather than an operating entity. On its face, this is already confusing. Left uncorrected, it risks trickling down into real compliance problems where market actors may struggle to determine with confidence whether the proposed restrictions apply to them.

Second, imposing a strict, blanket prohibition on minors under the age of fifteen from accessing social media networks goes against the DSA approach on "age-appropriate design" and "privacy, safety, and security by design". This involves tailoring the digital environment to the developmental needs of children to protect their fundamental rights to participation, access to information, and freedom of expression, rather than excluding them entirely. Any threshold or verification mandate must be proportionate and appropriate to the actual risks posed by a specific platform. In the DSA, before implementing any-age restrictions, providers are instructed to conduct an independent, case-by-case assessment of their platform's specific risks and evaluate the potential impact such restrictions might have on fundamental rights and freedoms. Therefore, applying a universal age threshold and verification mandate across all social networking services operating in Greece bypasses this platform-specific risk review entirely.

Third, to enforce the prohibition on minors under the age of fifteen accessing social media, the Greek draft law mandates that the providers of online social networking services apply appropriate, proportionate, and reliable age-verification methods. This would include the equivalent European Union age-verification solution, incorporated in the 'Gov.gr Wallet' application and the 'Kids Wallet' application in order to restrict access to users who have not yet reached the age limit laid down in the Greek draft law. In practice, we anticipate that these are the only methods which will be enforced by national authorities absent uniform age assurance approaches. Under the DSA and the eIDAS framework, Member States face strict limits on imposing unilateral technical mandates on platforms. Additionally, paragraph 48 of the Guidelines on the protection of minors under Article 28 DSA provides that where the provider of an online platform determines age assurance-based restrictions are necessary, the Commission expects it to offer users more than one age assurance method, not a single, state-mandated age verification solution.

² Charter of Fundamental Rights of the European Union, available [here](#).

³ European Commission's Guidelines on measures to ensure a high level of privacy, safety and security for minors online, pursuant to Article 28(4) of Regulation (EU) 2022/2065, available [here](#).

⁴ Recital 9 DSA provides that: "Member States should not adopt or maintain additional national requirements relating to matters falling within the scope of this Regulation, unless expressly provided for in this Regulation, since this would undermine the direct and uniform application of the fully harmonised rules applicable to providers of intermediary services pursuant to the objectives of this Regulation".

Fourth, consistent with the e-Commerce Directive,⁵ the DSA upholds the country-of-origin principle as a cornerstone of European Union law. Under this principle, Member States must refrain from imposing additional, potentially burdensome national obligations on service providers that have their main establishment and are regulated in another Member State. By asserting jurisdiction over every service accessible within its borders, the Greek draft law disregards the exclusive competence of the Member State of main establishment and introduces severe regulatory fragmentation into the internal market. Article 3(4) of the e-Commerce Directive does permit derogations from the country-of-origin principle, but only in specific circumstances where a service causes, or poses a serious and grave risk of causing, prejudice to the objectives that the restrictions is meant to protect. Invoking this exception also requires meeting strict procedural steps, including a prior request to the Member State of establishment and formal notification to the European Commission. CCIA Europe maintains that the proposed Greek legislation fails to satisfy the necessary criteria to warrant such an exception.

Finally, the enforcement of the DSA relies on a fully harmonised system of cooperation between the Digital Services Coordinators (DSCs) of the Member States, heavily relying on the country-of-origin principle where the Member State of main establishment holds primary jurisdiction (Chapter IV DSA). The Greek draft law, in Article 5, empowers the Greek national authority (EETT) to supervise the obligations imposed on platforms and explicitly instructs EETT to notify the DSC of another Member State if a platform established there is suspected of non-compliance. As established by the European Commission in a recent detailed opinion regarding similar draft legislation, forcing a national authority to signal breaches by platforms established in other Member States duplicates and encroaches upon the fully harmonised cooperation rules set out in Articles 56 and 58 of the DSA, and the country of origin, and therefore, contradicts EU law.⁶

II. Incoherence with other EU laws

Member States must avoid adopting divergent national rules that fragment the Single Market - particularly where EU law already establishes a harmonised framework and the European Commission is advancing further measures to protect minors online.

CCIA Europe believes in harmonised and proportionate protective measures which do not lead to blanket bans that limit, restrict, or censor the online experience. Rather than relying solely on age exclusion, online protection strategies should rely on risk-based approaches that effectively mitigate harm. The Association considers that policy should foster a secure digital ecosystem that empowers parental guidance and leverages industry innovation in safety-by-design.

⁵ Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market ('Directive on electronic commerce'), available [here](#).

⁶ See European Commission Opinion on the draft legislative provisions aimed at protecting minors from the risks to which they are exposed by the use of social networks, Notification 2026/185/FR, July 2026. Available [here](#).

Online safety is heavily regulated. European Union rules, including the DSA, the Audiovisual Media Services Directive (AVMSD),⁷ and the Regulation on Addressing the Dissemination of Terrorist Content Online (TCO)⁸, alongside many other initiatives,⁹ already establish a harmonised framework based on safety-by-design principles. While safety measures can continually evolve, creating national legal fragmentation through unilateral social media bans generates profound regulatory uncertainty and undermines a cohesive European approach to child safety.

Under the Fegert-Melchior report commissioned by Commission President von der Leyen to advise on making the online world safer for children, the recommended approach is not blanket bans but harmonised access restrictions for under-13s, requiring supervision rather than total exclusion, along with ‘safe by design’ platform features in full alignment with the DSA.¹⁰

With the European Commission’s ambitions to publish a social media regulation after the summer, Member States should refrain from adopting additional obligations particularly when blanket bans are demonstrably ineffective. Evidence from international models indicates that total bans result in widespread circumvention, the migration of minors to alternative, less-regulated platforms, reduced visibility for safety interventions, greater burdens on parents, and significant privacy concerns regarding data collection.¹¹

A feature-based, safety by default approach is inherently more proportionate. CCIA Members have developed sophisticated age-assurance technologies, robust parental controls, and default safety features. Regulation that engages the industry in delivering outcomes is far more effective than regulation that simply removes access. A framework elevating parental guidance through consent and graduation is entirely preferable to categorical exclusion and far more coherent with the current European framework.

III. Interference with children’s freedom of expression and information

By disproportionately restricting minors’ ability to seek and receive information, the Greek draft law infringes upon children’s fundamental rights - and must be rejected in favor of existing, more proportionate safeguards.

⁷ Directive 2018/1808 of the European Parliament and of the Council of 14 November 2018 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities, available [here](#).

⁸ Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online, available [here](#).

⁹ European Commission, Protecting and empowering young people online, consulted in July 2026, available [here](#).

¹⁰ European Commission, Special panel on child safety online, published in July 2026, available [here](#).

¹¹ See Australian eSafety Commissioner, Social media minimum age: Compliance update, Australian Government, March 2026, available [here](#); ABC News, “Why teens say social media ban isn’t working for under-16s,” June 14, 2026. Available [here](#); Anna Bawden, “Four in five under-16s in Australia using social media despite ban, study shows,” *The Guardian*, June 24, 2026. Available [here](#); Courtney Barnes et al., “Assessing early effects of Australia’s Social Media Minimum Age Act on adolescents’ social media use: observational study,” *The BMJ*, BMJ 2026; 393: e363695, June 2026. Available [here](#).

The right of minors to seek and receive information is protected by the European Convention on Human Rights (ECHR), including the right to hold opinions and to receive and impart information and ideas,¹² and Article 24 of the Charter of Fundamental rights of the European Union, according to which children possess explicit rights to express views freely.

By establishing a blanket ban, the Greek draft law significantly limits users under fifteen years of age to engage with key digital spaces for education, civic participation, and communication. Given that the European Commission guidelines on Article 28 DSA specify that minor protection measures must preserve fundamental rights through proportionate means, categorical access bans directly conflict with these rights.

Broad national prohibitions do not account for distinct risk profiles across online platforms. Identifying specific service features and mitigating associated risks provides a targeted alternative that maintains access to age-appropriate online environments while avoiding redundant national restrictions.¹³ Sustainable policy solutions depend on digital education, media literacy, and support for families rather than statutory bans.

Conclusion

Children deserve a safe internet. But the proposed Greek draft law is the wrong way to get there. It breaches EU law, including the DSA and the country-of-origin principle. It fragments a single market that depends on regulatory harmonisation to function. And it disproportionately restricts young people's own fundamental rights to expression and information. A blanket national ban is a blunt, ineffective instrument for a problem that requires precision.

The better path is the one the EU has already set out: risk-based, safety-by-design regulation, paired with parental empowerment, delivered through a single, unified European framework rather than a patchwork of national exceptions. CCIA Europe calls on the European Commission to issue a detailed opinion declaring the Greek draft law incompatible with EU law, and requesting that Greece pause its initiative.

¹² Article 10(1) of the European Convention on Human Rights states that “everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. This Article shall not prevent States from requiring the licensing of broadcasting, television or cinema enterprises”. Text available [here](#).

¹³ More details on CCIA Europe's views on age-appropriate design can be found [here](#).

About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

Visit ccianet.eu, x.com/CCIAEurope, or linkedin.com/showcase/cciaeurope to learn more.

For more information, please contact:

CCIA Europe's Head of Communications, Kasper Peters: kpeters@ccianet.org