



**Submission to the Oireachtas Committee on Children,  
Equality, Disability, Integration and Youth -  
Protection of Children in the Use of Artificial Intelligence**

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## **IMO Submission to the Oireachtas Committee on Children, Equality, Disability, Integration and Youth – Protection of Children in the use of Artificial Intelligence**

The IMO would like to thank the Oireachtas Committee on Children, Equality, Disability, Integration and Youth for the invitation to make a submission on the Protection of Children in the use of Artificial Intelligence.

The IMO has become increasingly concerned about the impact of Social Media on the Mental health and well-being, particularly of young people and was a topic discussed at length at our recent AGM in Killarney, Co Kerry April 4-6<sup>th</sup> with concerns raised about the AI driven tools employed that target young people, keep them engaged on-line and spread harmful content.

Worldwide an increasing body of evidence shows that excessive social media use is associated with poor mental health and well-being particularly among young people.

A 2018<sup>i</sup> study demonstrates that across the US that between 2010 and 2015, average levels of social-media use, depressive symptoms, and rates of suicide increased in lockstep, especially among females. Adolescents who spent more time on new media (including social media and electronic devices such as smartphones) were more likely to report mental health issues than adolescents who spent more time on non-screen activities. Related research shows that other indicators of poor mental health and psychological wellbeing have increased among teens and young adults since 2012, including dissatisfaction with life<sup>ii</sup> and loneliness<sup>iii</sup>.

Harmful content related to social media and suicide and self-harm include normalising of self-harm discussion of motivation or triggers, concealment, suicidal ideation or plans; and live depictions of self-harm acts.<sup>iv</sup> Numerous studies show that for adolescents, greater time spent on social media is associated with increased self-harm behaviour and suicidal ideation, linked to users receiving damaging messages promoting self-harm, copying self-harming behaviour of others, and emulating self-harm practices from shared videos.<sup>v</sup>

Recent research published by the WHO/Europe shows that 1 in 6 adolescents across Europe have experienced cyber-bullying up from 12%/13% in 2018.<sup>vi</sup> With both time spent on social media, and engagement in problematic use associated with both victimisation and perpetration.<sup>vii</sup>

A systematic review of 50 studies across 17 countries reveals that social media use is linked to body image issues, eating disorders/disordered eating, and poor mental health among young people.<sup>viii</sup> This connection is mediating through pathways like social comparison, internalization of thin/fit ideals, and self-objectification. Social media trends and pro-eating disorder content, as well as appearance focused platforms and investment in photos strengthen this relationship.

In terms of the addictive nature of social media, users commonly report experiences in their usage that mirror widely used criteria for establishing addiction, including the inability to reduce their use of social despite wanting to and withdrawal symptoms when they are unable to access social media.<sup>ix</sup> In terms of social media addiction, it is estimated that 20% of adolescents may use social media for at least 5 hours daily.<sup>x</sup>

We know that Artificial Intelligence (AI) is the driver behind the many of the tools deployed by social media companies to target young people, keep them engaged and to spread harmful content, AI driven features include:

- recommender systems – which use AI algorithms to learn from past user behaviour to predict content that users might find interesting or engaging, for example taking into account users' viewing history, search queries, likes/dislikes, as well as information on similar content that other users have enjoyed.
- Infinite scroll – which again uses AI to feed users with an endless stream of content tailored to their preferences
- push notifications, - which use AI to deliver timely and personalised messages to users in order to keep them engaged in their platforms
- Beauty filters – which use AI to manipulate and alter a user's appearance in real time.

The My World 2 Survey of Youth Mental Health in Ireland<sup>xi</sup> which surveyed over 10,000 adolescents 12-19 years old in 2019 found that:

- Over 96% of adolescents reported having a social media profile or account.
- Of those who reported to have a social media profile, 96% reported having Snapchat, 90% Instagram, 54% Facebook, 28% Twitter and 4% had a Dating App.
- Just over one-third of adolescents (34%) reported spending more than three hours online per day, 29% reported spending 2-3 hours online a day
- Compared to the first survey in 2012, the proportion of adolescents who fell into the severe and very severe categories for depression increased from 8% to 15%
- Similarly the proportion of adolescents who fell into the severe and very severe categories for anxiety increased from 11% to 22%
- Adolescents who reported spending less than two hours online were more likely to be in the normal range for depression, and adolescents who reported spending more than three hours online were more likely to be in the very severe range for depression. A similar pattern was observed for anxiety.
- A clear trend was also observed between body esteem and time spent online; adolescents who spent more time online had lower levels of body esteem.

Until recently social media and AI has largely been unregulated. National and European legislation including the Online Safety and Media Regulation Act 2022, the EU Digital Services Act and the EU Artificial Intelligence Act, include measures that should better

protect young users from on-line harm. However, the IMO is of the view that the legislation does not go far enough and further action is needed. At this year's IMO AGM , the following general motions were carried in relation to smartphone use and social media:

**The IMO calls on the Department of Education to institute a ban (from the start of the next school year) on Smartphone use by pupils within all primary schools in Ireland.**

Earlier this year the UK Government issued guidance on prohibiting mobile phone use with a view to removing unnecessary distraction, disruption and diversion a creating a safe space where pupils are protected from the risks and dangers associated with social media and cyber-bullying.<sup>xii</sup>

**The IMO calls on the Department of Health, in light of the US Surgeon General's Advisory on "Social Media and Youth Mental Health" , to urgently develop a well-funded public health strategy modelled on successful "tobacco free" policies to combat social media addiction, use and harm.**

In 2023 the US Surgeon General issued an advisory<sup>xiii</sup> (reserved for significant public health issues that require urgent action) calling attention to the growing body of evidence relating to the harmful impact of social media on youth mental health. Like other products, goods and services a safety first approach is needed and until safety is demonstrated with rigorous evidence and independent evaluation, protections must be put in place to minimize the risk of harm. The US Surgeon General recommended a multi-faceted approach to better safeguard the mental health and well-being of children and adolescents from the harms of social media including actions by policymakers, technology companies, researchers, families, and young people.

Measures proposed by the IMO can include but are not limited to

- Strengthening age restriction and verification processes for social media accounts
- Explore options to charge per usage ( akin to minimum unit pricing for alcohol).
- Increase competition with alternative not-for-profit or Governmental/EU search engine and hosting platform
- Social Media platforms to be treated as publishers and subject to the same regulations as other media outlets
- Outlaw any algorithmic device that could lead to problem use

**The IMO calls on the Government, in light of the case taken by 42 US Attorneys General against Meta for their product's detrimental effect upon youth mental health to urgently investigate the allegations and publish opinion on whether a similar case should be taken in Ireland.**

In October 2023, 42 Attorney Generals from 33 US States filed a federal lawsuit against Meta<sup>xiv</sup> accusing the company of developing a business model that deliberately targets young people for financial gain maximising the time and attention young users spend on their Social Media Platforms Facebook and Instagram. They accuse Meta of designing and

deploying harmful and psychologically manipulative features such as dopamine-manipulating recommender algorithms, “likes” and social comparison features, audio visual and haptic alerts that recall young users to their platforms during school and at night, visual filters that promote body dysmorphia and content presentation formats such as infinite scroll that keep young users engaged with their platforms. They accuse Meta of falsely representing their platforms as safe, refusing to abandon harmful features and downplaying the impact of those features on young users mental and physical health.

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