



HIGH COURT OF AUSTRALIA

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IN THE HIGH COURT OF AUSTRALIA
SYDNEY REGISTRY

S166/2025

BETWEEN:

REDDIT, INC.

Plaintiff

and

COMMONWEALTH OF AUSTRALIA

First Defendant

MINISTER FOR COMMUNICATIONS

Second Defendant

PLAINTIFF'S SUBMISSIONS

PART I FORM OF SUBMISSIONS

1. These submissions are in a form suitable for publication on the Internet.

PART II ISSUES

2. Is Pt 4A of the *Online Safety Act 2021* (Cth) invalid because it impermissibly burdens the implied freedom of political communication?¹

PART III SECTION 78B NOTICES

3. The Plaintiff has given notice under s 78B of the *Judiciary Act 1903* (Cth) (**SCB 62-65**).

PART IV FACTS

4. The facts are stated in the special case. Reddit emphasises the following.

A STATUTORY FRAMEWORK

5. **The text:** Part 4A was inserted into the Act by the *Online Safety Amendment (Social Media Minimum Age) Act 2024* (Cth) (**Amendment Act**). Under s 63D, “[a] provider of an age-restricted social media platform must take reasonable steps to prevent age-restricted users having accounts with the age-restricted social media platform”. The term “age-restricted user” is defined in s 5 to mean “an Australian child who has not reached 16 years”. Failure to comply with s 63D can attract a civil penalty of 30,000 penalty units which, for a corporate respondent, can be multiplied by 5, meaning a penalty of up to \$54.6 million.²
6. The term “age-restricted social media platform” is defined in s 63C. Broadly, it is either an “electronic service” that satisfies certain conditions specified in the Act and rules made under the Act (para (1)(a)), or a service that is specified in the rules (para (1)(b)).³ There are some exclusions, including where the service is specified in the rules (s 63C(6)(b)).
7. On 25 March 2026, the *Online Safety (Age-Restricted Social Media Platforms) Rules 2025* (Cth) were amended to insert rule 4A (**SC [40]**). That rule provides a further condition which an electronic service must satisfy in order to be an age-restricted social media platform for the purposes of s 63C(1)(a)(iv), being that a service must have either or both of a “recommender feature” or a “logged-in feature” as defined (rule 4A(1)).

¹ Reddit’s position is that it is not an “age-restricted social media platform” within the meaning of s 63C of the Act (**SCB 70 [29]**). However, the Court is presently concerned only with the question of validity of Pt 4A: see *Reddit, Inc. v Commonwealth of Australia* [2025] HCATrans 84, Order 1. For that reason, the correctness of the eSafety Commissioner’s position on whether any platform is captured does not arise: see [12] below.

² *Regulatory Powers (Standard Provisions) Act 2014* (Cth), s 82(5). The value of a penalty unit was indexed to \$364 on 1 July 2026 under s 4AA of the *Crimes Act 1914* (Cth).

³ To date, the Minister has not specified any services under s 63C(1)(b).

8. Before specifying an electronic service for the purposes of either s 63C(1)(b) or (6)(b), the Minister must seek and have regard to advice from the eSafety Commissioner (s 63C(5), (7)). The eSafety Commissioner is a statutory body which has various functions relating to online safety (s 26, see especially s 27(b), (c), (d), (k)).
9. **Legislative history:** The Amendment Act was not the product of considered deliberation. The policy it reflects was first announced on 10 September 2024 (SC [22]). On 8 November 2024, the Prime Minister announced that National Cabinet had met and First Ministers had agreed to the Commonwealth legislating to impose a minimum age of 16 to access social media in Australia (SC [24]). Less than two weeks later, on 21 November 2024, the Minister introduced the Amendment Bill into the House of Representatives (SC [25]). No exposure draft was released (SC [25]). On the same day, the Bill was referred to the Senate Environment and Communications Legislation Committee. Any party wishing to make a submission had just 24 hours to do so, and the Committee was required to report two business days later (SC [27]). The House of Representatives debated the Amendment Bill on 25 and 26 November 2024 (SC [28]), and passed the Bill on 27 November 2024 (SC [29]). On the same date, the Bill was introduced into the Senate, and the Senate passed the Bill with amendments the following day (SC [30]-[31]). The House of Representatives agreed to the Senate's amendments to the Bill on 29 November 2024 (SC [32]).
10. **The eSafety Commissioner's view:** The measures adopted in the Amendment Act were *discouraged* by the eSafety Commissioner in submissions to two parliamentary inquiries (SC [15], [18]). In the first, the Commissioner said that “[a]n abstinence-based approach to cutting off young people from the internet is likely to have adverse consequences for the mental health and wellbeing of children and young people not from supportive homes with engaged parents”, and “could shut vulnerable young people off from support services and affinity groups” (SCB 253). She also said that “[s]uch blunt force approaches could also prevent young people who are excluded from developing the key skills they will need to navigate the world safely as adults” (SCB 253; also 259-260). In her later submission, she said she had “concerns that some young people will access social media in secrecy”, which may mean that “they access social media without adequate protections in place and are more likely to use less regulated non-mainstream services that increase their likelihood of exposure to serious risks”, and that a ban “doesn’t work to build the capacity of young people to engage online safely” (SCB 771). Further, neither Committee recommended a measure like s 63D, after inquiries conducted over *months*, not days (SC [16]-[17]).

11. The eSafety Commissioner has candidly accepted that the law is deficient. She has said that she “was not really keen on [the ban] when it was first discussed”, because it was “a very blunt force approach”, and involved “asking us to ... fence the ocean”, which was “a futile exercise” (SCB 2499-2500). She also observed that the legislation implementing the ban was developed “very quickly”, with “very thin scaffolding” (SCB 2500).

B SCOPE OF THE BAN

12. *The affected platforms:* The eSafety Commissioner has publicly taken the position that 10 platforms are “age-restricted social media platforms” (SC [42]). They are Facebook, Instagram, Kick, Reddit, Snapchat, Threads, TikTok, Twitch, X (formerly Twitter), and YouTube. The key features of each of these platforms are summarised in the special case.
13. The obligation imposed by s 63D is to take reasonable steps to prevent young people from having accounts. That is so regardless of the consequences of having an account. For example, as explained below, the inability to have an account on Reddit or YouTube does little to prevent users from accessing the vast majority of content on those platforms. The law denies young people a key, but to a door that is already open.
14. *Reddit:* Reddit is an electronic service accessible through a web browser and on a mobile application, which commenced operation in about June 2005 (SC [52]-[53]). It is one of the top ten most-visited websites in the world, with 4.5 million monthly active unique logged-in users in Australia from April to June 2025 (SC [53]). In 2024, a survey undertaken by the eSafety Commissioner suggested 8% of Australians aged 13 to 15 used Reddit (SC [53]).
15. Reddit is predominantly text-based (SC [54]). It is organised into topic-based fora (“subreddits”), created and moderated by Reddit users (“moderators”). Subreddits facilitate dissemination of information relating to a particular subject-matter (SC [54]-[55]), and are titled with an “r/” followed by the topic, eg r/AustralianPolitics (SC [55]). On 31 March 2026, there were more than 100,000 active subreddits (SC [54]).
16. A user can access most of the content on Reddit without an account (SC [64]). It is a public website: *any person* with Internet access can browse and search for posts and comments. When a logged-out user accesses Reddit, they see a feed displaying “popular” recent posts on Reddit (SC [66]). They can click on any post to open it, scroll through the full post and associated comments, and click through to other posts, subreddits or external websites (SC [67]). They can use the search bar to search across public subreddits (SC [68]).
17. A user requires an account to *communicate* on Reddit. An account holder can: join

subreddits and “follow” other users, indicating that they want to see more content from that subreddit or user; post to subreddits, comment on other posts, and interact with posts and comments by “upvoting” and “downvoting” (to express approval and disapproval of content); give and receive awards, for example, in order to react to a user’s contributions in a subreddit; and receive “karma”, which is necessary to post in certain subreddits (SC [56], [71]). An account holder can also act as the moderator of subreddits, allowing them to create or supervise subreddits in which they are interested (SC [95]-[99]).

18. Once logged-in, an account holder automatically sees a “home feed” containing posts from the subreddits they have joined and posts by users they have followed (SC [76]). The home feed can also display posts and subreddits that are recommended by a process based on factors such as content that has generally been upvoted and the account holder’s past activity (SC [80]). From this feed, account holders can choose to view the “popular” feed (referred to above); a “news” feed, which displays news content from across subreddits, including on political and governmental matters; and (on the app only) a “latest” feed, which displays recently posted content from subreddits followed by the user (SC [77]).
19. From any feed or by using the search bar, a user can navigate to a particular subreddit or post. A subreddit is not an “endless feed”; the end point is defined by the number of posts in the subreddit. As noted, there are more than 100,000 subreddits. Further, a user must either manually scroll through the subreddit to see further posts, and manually click through to posts on other subreddits, or use the search bar to find posts. That provides a meaningfully different experience compared to an endless stream of video content.
20. An account holder can also modify their account settings. They can: disable the feature which allows Reddit to show “recommendations” in the home feed and the processes by which Reddit personalises ads based on the user’s Reddit activity and information from Reddit partners (SC [81]); stop video content playing automatically (SC [79]); disable various kinds of ads, such as for gambling, alcohol and weight loss (SC [82]); disable the chat function partially or entirely (SC [85]-[86]); disable notifications, choose which notifications they receive (SC [89]-[90]) and choose how some notifications are received (SC [90]); and join “Reddit Premium”, a paid subscription that removes ads (SC [100]).
21. The substantial majority of Reddit account holders choose a pseudonymous username (SC [73]). When users take steps to create an account, the system states that “Reddit is anonymous” and suggests a pseudonymous username (SC [72.1]). The system does not publicly display a user’s sex or gender identity (SC [72.3]), and users are given choices as

to their display name, identification image (or “avatar”), profile banner image, and any profile description (SC [72.4]; see also SCB 1218ff). Reddit does not provide for users to become “friends” with other users (SC [75]), and does not import users’ contact lists or address books (SC [74]). The usernames of users who react to content through upvotes or downvotes are not disclosed to other users (SC [60]).

22. There are thus at least four important differences between Reddit and other platforms said by the eSafety Commissioner to be subject to Pt 4A. *First*, the focus of Reddit is not *who* has posted content, but *what* they have posted. It is a platform for substantially pseudonymous users with a shared interest interacting in an interest-specific community, where visibility of posts is determined in part by “upvotes”. It is unlike other platforms where users are generally identified by name and communicate with people they know who directly post content to their profile, such as Facebook and Snapchat (SC [156], [173]). *Secondly*, unlike the home feeds of other platforms,⁴ the Reddit home feed is predominantly text-based, given Reddit itself is predominantly text-based, and can be comprised solely of content from subreddits the user has chosen to join without any “recommended” content. *Thirdly*, subreddits, which comprise a substantial proportion of the platform, are not “endless feeds”. That is not so for other platforms, eg TikTok, where a significantly greater proportion of the platform is comprised of endless feeds (SC [107]). *Finally*, unlike many other platforms,⁵ Reddit does not have a feature which allows users to post content which automatically disappears after a given amount of time (SC [57]).
23. **YouTube:** YouTube allows users to discover, watch and share videos and other content, provides a forum for people to connect and inform others, and acts as a distribution platform for original content and advertisements (SC [256]-[257]). On average, there are over 20 million videos uploaded daily to YouTube. Between 1 January and 31 July 2024, YouTube had an average of 25 million monthly active logged-in users in Australia, over 325,000 of whom were estimated to be between 13 and 15 (SC [258]).
24. As with Reddit, a substantial proportion of YouTube content is publicly accessible without an account (SC [259]). Further, a significant proportion of Australian users access YouTube logged out (SC [268]). Such logged out users may search for videos through a search engine

⁴ See, eg, SC [136.15], [137] (the Instagram “home” tab); SC [156.16], [157] (a user’s Facebook feed); SC [190.11], [191] (the X “for you” timeline); SC [225] (the “home” feed on the Threads mobile app); and SC [242.7] (the Kick “home” page).

⁵ See, eg, SC [107.3] (TikTok), SC [136.6], [136.8] (Instagram), SC [156.6] (Facebook), SC [172], [173.5], [173.6] (Snapchat), SC [208.5] (Threads) and SC [224.1] (Twitch).

or on YouTube; watch videos, including “live” videos; read comments, and see view counts and like totals; share videos externally by sending hyperlinks; access a home page with a continuous feed of recommended videos; and browse the “YouTube Shorts” feed, a continuous stream of short videos posted by users (SC [260]). Again, as with Reddit, a user needs an account to *communicate* on YouTube, by commenting on, reacting to or uploading videos. Further, as discussed at [50], only account holders can access protective features such as account settings and parental controls.

25. **Services not covered:** Certain classes of electronic services have been excluded from the definition of “age-restricted social media platform” under s 63C(6)(b) by rule 5 of the Rules (SC [36]-[38]). The specified classes include services that have the sole or primary purpose of enabling end-users to communicate by means of messaging, email, voice calling or video calling (rule 5(1)(a)) or enabling end-users to play online games with other end-users (rule 5(1)(b)). Therefore, Pt 4A does not prevent young people from holding accounts with, for example, widely used messaging services (such as WhatsApp, Messenger or Discord) and gaming services (such as Roblox or Steam) (SCB 2455, 2478).

PART V ARGUMENT

A BURDEN

26. **Scope of the burden:** There is no dispute that Pt 4A burdens the implied freedom to the extent that it restricts political communication *from* young people to other individuals, as well as *to* and *between* young people (see SCB 80 [28.5]-[28.8]). It is well settled that the implied freedom can be burdened even where the relevant communication is not between electors: it protects “political communication *from* all and *to* all”,⁶ which reflects that “*each member* of the Australian community has an interest in disseminating and receiving information, opinions and arguments concerning government and political matters that affect the people of Australia”.⁷ That is, “[t]here are many in the community who are not electors but who are governed and are affected by decisions of government”, such that “they, as well as electors, may seek to influence the ultimate choice of the people as to who should govern”.⁸ “The free flow of political communication is ‘not simply a two-way affair between electors and government or candidates’; it extends to communication between

⁶ *Ravbar v Commonwealth* (2025) 99 ALJR 1000 at [424] (Beech-Jones J) (emphasis in original).

⁷ *Lange v Australian Broadcasting Corporation* (1997) 189 CLR 520 at 571 (the Court); see also *Farmer v Minister for Home Affairs* (2025) 99 ALJR 1408 at [175] (Gleeson J).

⁸ *Unions NSW v New South Wales* (2013) 252 CLR 530 at [30] (French CJ, Hayne, Crennan, Kiefel and Bell JJ).

electors and between electors *and other persons* who may seek to influence the ultimate choice of the people as to whom they elect as their representatives”.⁹

27. *Nature of the burden:* The implied freedom has “within its scope both the expression and reception of ideas via the complete range of media by which political communication is achieved”.¹⁰ Part 4A prohibits young people from using tools of political communication which are of central importance to political communication and civic engagement in 2026.
28. Online platforms, including social media, are a common source of news and political information for Australians, including those under 16 (SC [306]). In May 2026, a study of more than 1,000 Australians aged 10-17 found social media is a primary source of news for young Australians,¹¹ with 41% having used it to access the news the previous day and 32% following social media accounts specifically to receive news (SC [309.1], see also SC [308.2]), and with social media being the second-most preferred news source (39%) behind family (52%) (SC [309.2]). It also found that use of social media to receive news increases with age, from 37% for 10-12 year olds to 72% for 16-17 year olds (SC [309.3]).¹²
29. Part 4A has already negatively impacted young people’s civic engagement. Of the 26% of young Australians who reported they had been “significantly affected” by the ban: 51% said they were receiving less news; 47% reported less access to world news and events; 45% experienced less opportunity to share views or take action; 42% reported less access to local news and events; 41% reported less access to news about issues they care about; and 40% reported having fewer discussions about news with others (SC [309.5]).
30. These statistics are unsurprising given an account is necessary for young people to communicate on the relevant platforms. On Reddit, young Australians cannot post on any of the numerous subreddits dedicated to Australian political matters (SC [310], [320]). They cannot ask questions during an “Ask Me Anything” session, which have previously been hosted by many Australian politicians, candidates and public institutions (SC [63], [312]). They cannot make posts linking to news articles, government announcements, parliamentary debates or policy proposals, or participate in discussions by commenting or voting on content (SC [311]; SCB 1297ff). They cannot comment on or react to the vast

⁹ *Farmer* (2025) 99 ALJR 1408 at [40] (Gageler CJ, Gordon and Beech-Jones JJ) (emphasis added), see also [137] (Steward J).

¹⁰ *Farmer* (2025) 99 ALJR 1408 at [240] (Jagot J).

¹¹ See also SC [307]-[308], concerning studies which support the same conclusion.

¹² See also the study presented by Professor Ariadne Vromen (SC [318]). While that study analysed the habits of 16-29 year olds, it is obvious that young people’s habits do not change substantially on their 16th birthday.

amount of political content on YouTube (SC [321]) or TikTok, including on constitutional referenda and international conflicts and humanitarian crises (SC [323]-[327]). Young Australians cannot engage with the social media accounts of the youth wings of the Australian Labor Party, Liberal Party of Australia and Australian Greens (SC [314]-[316]).

31. Social media is particularly significant for vulnerable and minority groups. The impact on access to news is greater for those whose parents have a lower level of education (SC [309.7]). In 2021, a survey by the eSafety Commissioner of young people and their parents or caregivers showed that Aboriginal and Torres Strait Islander and LGBTQIA+ youth engage in social and political discussion online at higher rates than the average Australian teen cohort (SC [317]). Submissions to the 2024 parliamentary inquiry (referred to in [10] above) emphasised that social media is of considerable importance to Aboriginal and Torres Strait Islander and LGBTQIA+ young people, young people in rural and remote areas, trauma survivors, and culturally and linguistically diverse young people (at [3.85]-[3.91]) (SCB 601-603). Political communication may be enabled through these platforms because they provide spaces for education, support and self-expression (including for vulnerable and minority groups) (SC [358], [376]; SCB 599-603).
32. Part 4A also denies young people the ability to harness social media as a democratiser of communication. Social media is unique in its ability to provide free and effective means of communication to a mass audience, for people who would not ordinarily be able to communicate through mainstream media (which typically includes young people). There are many examples of young people using social media to deliver political messages to a wide audience, including: Swedish climate-change activist Greta Thunberg; Australian climate-change activist Anjali Sharma; Abbie Jane, who, at age 12, launched the Rainbow Shoelace Project to fight homophobia in remote New South Wales; School Strike 4 Climate campaigners (who used TikTok to promote participation); and Leonardo Puglisi who, aged 11, founded what is now known as 6 News Australia on YouTube and X (SC [313], [323]).
33. The impact is not limited to young people's online engagement with political matters. Research demonstrates a positive correlation between political interest and civic engagement both online and offline, and that the use of social media is significantly predictive of offline civic engagement (SC [319]).
34. By Pt 4A, young Australians cannot use one of the most significant modes of political communication in modern society: a tool for political organisation, civic education, and direct access to representatives. They are already left less politically engaged and informed.

35. ***Extent of the burden:*** Prior to the Amendment Act, use of social media platforms was almost universal among young Australians. On 30 June 2025, there were approximately 675,858 Australians aged 14 and 15 (SC [301]). Research published in December 2025 demonstrated that approximately 624,000 Australians in that age bracket – or roughly 92.33% of that cohort – had used at least one social media platform during a four-week period (SC [305]). The very high proportion of young Australians who previously used social media is confirmed by three other recent studies, including one conducted by the eSafety Commissioner between December 2024 and February 2025 (SC [302]-[304]).
36. The burden is already manifest. In January 2026, the eSafety Commissioner reported that, across all reporting platforms, 4.7 million accounts had been removed or restricted (SC [46], SCB 1193; see also SC [47]-[49]). Beyond the platforms identified by the Commissioner, a further 11 have stated that they consider themselves caught by Pt 4A (SC [51]). To the extent that those providers comply with s 63D so as to avoid enforcement action, the burden extends to the use of those platforms to engage in political communication.
37. The burden imposed by the law extends to communication across the entirety of the “people of the Commonwealth”. That is because Pt 4A also prohibits adults, such as family members, teachers, health professionals, religious or community leaders and politicians, from ***receiving*** communications from young people to the extent that such communication would otherwise be done through, ***or informed by***, the use of a platform in a way that requires an account. It also extends to political communication ***from*** adults to the extent they are unable or unwilling to complete any age assurance process, for example for privacy reasons, and so will not retain or create new accounts.
38. For these reasons, the burden is direct and very substantial. The primary “mode” of political communication affected by the law is an extremely important one in Australia, particularly for the more than 600,000 young Australians. “[I]f a restriction on a preferred mode of communication significantly compromises the ability of those affected to communicate their message, it may not be an answer that they are left free to communicate by other, less effective means”.¹³ That is the case here. The intense burden requires commensurately intense scrutiny.¹⁴

¹³ *Brown v Tasmania* (2017) 261 CLR 328 at [258] (Nettle J), summarising *ACTV* (1992) 177 CLR 106 at 145-146 (Mason CJ) and referring to 173 (Deane and Toohey JJ).

¹⁴ *Brown* (2017) 261 CLR 328 at [128] (Kiefel CJ, Bell and Keane JJ).

B LEGITIMATE PURPOSE

39. The purpose of Pt 4A is “to reduce the risk of harm to age-restricted users from certain kinds of social media platforms”. That is consistent with the statutory object set out in s 63B.¹⁵ Reddit accepts that is a legitimate purpose.¹⁶
40. The Commonwealth’s position is that the purpose of s 63D is “to reduce the risk of harm to age-restricted users from the use of accounts on social media platforms that have the design features that are described in rule 4A of the Rules” (SCB 80 [28.9]). Generally speaking, it is impermissible to refer to regulations made under an Act to construe an Act.¹⁷ That must be so here in circumstances where rule 4A of the Rules was not made until 16 months after the Act was enacted, almost 4 months after s 63D commenced, and after the present litigation was commenced. It is clear that the Act can operate without any rules made under s 63C(1)(a)(iv) to prescribe additional criteria (see “(if any)”), and indeed did so.
41. The Rules suggest a belated attempt to narrow the purpose and create an otherwise missing link between the purpose of the law (preventing harms) and the means chosen to address it (banning accounts). The Commonwealth seeks impermissibly to merge purpose with means, collapsing the third part of the *Lange* test. However, the stream cannot rise higher than its source:¹⁸ the power to make Rules is dependent on the validity of the Act. The validity of a law that burdens the implied freedom depends upon the legitimacy of its purpose. That purpose cannot be recalibrated by adding Rules or altered at the whim of the Executive from time to time by the making of different Rules. Otherwise, the law could lose and regain constitutional validity from time to time.
42. In any event, for the reasons below, the law is not “reasonably appropriate and adapted” to achieve its purpose, even if the Commonwealth’s identification of purpose were correct.

C REASONABLY APPROPRIATE AND ADAPTED

(1) The ban does not address the risk of harm

43. There is a fundamental disconnect between what the law is intended to achieve, and what it in fact achieves (or could achieve). That disconnect arises on the face of the law itself. *First*, none of the criteria set out in s 63C(1)(a) relate to whether an electronic service might carry

¹⁵ See, eg, *Unions NSW v New South Wales* (2019) 264 CLR 595 (*Unions No 2*) at [79] (Gageler J); *Ruddick v Commonwealth* (2022) 275 CLR 333 at [133] (Gordon, Edelman and Gleeson JJ).

¹⁶ Cf *Monis v The Queen* (2013) 249 CLR 92 at [348]-[349] (Crennan, Kiefel and Bell JJ).

¹⁷ *Master Education Services Pty Ltd v Ketchell* (2008) 236 CLR 101 at [26] (the Court).

¹⁸ *Australian Communist Party v Commonwealth* (1951) 83 CLR 1 (*Communist Party Case*) at 258 (Fullagar J).

any risk of harm. As a result, the scope of services captured is unnecessarily over-broad. *Secondly*, the obligation imposed on those services by s 63D is to prohibit accounts, regardless of whether that would reduce the risk of harm on the platform. Further, as explained below, it also fails to achieve its purpose in its practical operation, and does nothing to address the same or similar risks of harm from other electronic services.

44. ***Content is still widely accessible:*** The Amendment Act does not provide protection from content which young people may continue to access on online platforms without an account. As explained above in relation to Reddit (at [16]) and YouTube (at [24]), there are swathes of content, comprising a substantial proportion of all content on those platforms, that are accessible without an account. For example, Pt 4A does ***nothing*** to stop an Australian child from sitting in their bedroom late at night watching videos on YouTube.
45. People without accounts can also use a web browser to view and search for limitless content on Snapchat (SC [181]), Threads (SC [216.4]), Twitch (SC [233]) and Kick (SC [250]). There is nothing in the Act to prevent this being permitted by platforms such as TikTok, Instagram or Facebook, which already permit users to search for, and view, some amount of content (SC [116]-[119], [144], [166]). Thus, to the extent that Parliament sought to address particular kinds of content, that content remains readily and widely accessible by young people, and could lawfully be made even more available. And, as explained below, Pt 4A ***removes*** protective measures which minimise exposure to harmful content.
46. ***Design features still operate:*** A ban on holding accounts does nothing to address risks of harm arising from particular design features apparently the subject of the Commonwealth's concern, where those features appear on platforms ***without*** the use of an account. In respect of all but one of the online harms detailed in the special case, the given risk or association arises in connection with the "design features" at SC [336] (SC [335], [349], [356], [361], [367], [372]). In the other instance, being possible alterations in brain development, the risk arises from the "use" of ***screen*** media (SC [346]). Yet, a user without an account can still access these design features – and therefore be exposed to the identified risk or association – in various ways, including through: (a) "endless feeds" (SC [336.2]) on Reddit (SC [66]), TikTok (SC [108], [116.1]), Snapchat (SC [181]), Threads (SC [216.4]), Twitch (SC [233]), Kick (SC [250]) and YouTube (SC [260]-[261]); (b) recommended/customised content (SC [336.6]) on Reddit (SC [66], [70]), TikTok (SC [116], [119]), Snapchat (SC [181]), Threads (SC [216.4]) and YouTube (SC [281]); (c) displaying numbers of "likes", reactions or views (SC [336.5]) on Reddit (SC [66]-[67]), TikTok (SC [116.3]), Instagram

(SC [144]), Snapchat (SC [183]), Twitch (SC [233]), Kick (SC [250]) and YouTube (SC [260.3]-[260.4]); and (d) time-limited content (SC [336.4]) on TikTok (SC [116.7]) and Instagram (SC [144]).

47. If Parliament wanted to stop young people from being exposed to “design features”, it did so only to a very limited extent, and entirely coincidentally as to how a platform operates. Further, there is *nothing* in the Act to prevent platforms from making these design features even *more* prevalent in the aspects of the service that are available to logged-out users.
48. ***Exclusion of platforms with risks of harm:*** As noted above, messaging and gaming services are excluded. There is *nothing* to stop an Australian child from sitting in their bedroom late at night playing video games, sending messages, or chatting on video calls. Part 4A is wholly indifferent to the risk of harm posed by these other services. The eSafety Commissioner found that 1 in 3 children had their most recent or impactful experience of cyberbullying on messaging services and 1 in 4 had it on gaming services (SCB 1179). The Parliament has also not sought to address the credible risks, based on peer-reviewed research, that: extended use of screen media such as emails, WhatsApp and the use of computers or gaming can impact the sleep of children by reducing sleep duration and increasing sleep disruption (SC [350]); extended use of screen media such as mobile phones and video games increases the likelihood that children will develop mental health conditions such as depression and anxiety, suicidal behaviours and suicidal ideation and/or, where children have existing mental health conditions, that those conditions will become clinically worse (SC [355]); and that other screen media use such as television and video games intensifies the symptoms of children under 16 who have ADHD (SC [368]).
49. While under-inclusiveness is not necessarily fatal,¹⁹ the persuasiveness of the justification for the law is considerably undermined when a very large part of the problem that is sought to be addressed is left out of scope without any cogent explanation.
50. ***Prohibiting accounts worsens the risks of harm:*** Part 4A *removes* access to measures which assist in protecting young people, because they are only available to account holders. As already explained at [20], Reddit account holders are given control over matters such as the extent to which audiovisual content plays automatically, and whether and how the Reddit system recommends new content in a manner which logged-out users are not.²⁰

¹⁹ *Brown* (2017) 261 CLR 328 at [222]-[223] (Gageler J).

²⁰ Similar control over design features is given to account holders on other platforms: eg, account holders can disable “autoplay” of audiovisual content on Facebook (SC [158]), X (SC [192]) and Twitch (SC [226]).

Young people using other platforms without an account are also unable to be protected from exposure to particular harmful content as they previously had been, when platforms restricted access to sensitive content based on the account holder being under a particular age,²¹ or a user could take advantage of tools to set limits on their screen time.²² Parents are also unable to utilise parental control features which enabled them to limit young people's access to social media platforms and exercise oversight over their activity.²³

(2) The ban is ineffective

51. Even if a ban on holding an account *could* address the risks of harm, Pt 4A could only achieve its purpose if it in fact prevented young Australians from having an account on age-restricted social media platforms. On the technology currently available, compliance with the obligation to take “reasonable steps” to prevent young people from having accounts does *not* mean that they will not have accounts.
52. In particular, the effectiveness of Pt 4A depends on the availability of technology to determine the age of users. Even the Commonwealth's own independent report published in August 2025 (SC [379]) accepted that this technology has serious limitations. *First*, each of the three main methods used to determine age has constraints in relation to non-majority groups. In relation to “age verification” (use of a verified date of birth), the report said that “there may be cultural and education barriers” (SCB 1998), that “gaps persist in remote and very remote communities”, and that “exact age verification for children is constrained by limited access to hard data” (SCB 1926). In relation to “age estimation” (the application of biometric or statistical techniques such as facial analysis, voice modelling or motion pattern recognition) (SCB 1820), some of the systems “exhibited reduced accuracy for non-Caucasian users”, and “[u]nderrepresentation of Indigenous populations ... remains a challenge that vendors are *beginning* to address” (SCB 1829, emphasis added, see also SCB 2100), and that “[s]kin tone is a known source of bias” (SCB 2103). In relation to “age inference” (the drawing of a conclusion about age by analysing known facts about the user) (SCB 2149), “demographic sensitivity” remains an “active area[] for improvement”, and “[s]ome systems risked bias where signals correlated with cultural, linguistic or

²¹ See, eg, SC [125] (in relation to TikTok “Restricted Mode”); SC [150] (in relation to Instagram “Teen Account” settings), SC [165] (in relation to Facebook “Teen Account” settings), SC [215] (in relation to Threads “Teen Account” settings), SC [269]–[272] (in relation to YouTube).

²² For example, Facebook (SC [170]), Threads (SC [219]) and YouTube (SC [274]).

²³ See, eg, SC [122]–[124] (in relation to TikTok); SC [149] (in relation to Instagram); SC [169.2] (in relation to Facebook), SC [186] (in relation to Snapchat). Prior to the Amendment Act, Twitch and Kick only permitted users under 18 to use the service under the supervision of a parent or guardian (SC [235], [252]).

socioeconomic factors” (SCB 1846). Similar issues with age estimation technology were identified in an earlier report by the eSafety Commissioner (SC [378]).

53. *Secondly*, the Commonwealth’s report accepted that the technology may be inaccurate more generally. It said that performance of age estimation technology “may degrade under poor lighting, occlusion, extreme angles or low-resolution input” (SCB 1828), and “[a]ccuracy varies in suboptimal conditions” (SCB 1829). The mean absolute error for 13 year olds was 2.76, for 14 year olds was 2.91 and for 15 year olds was 3.02 (SCB 2083), which is significant given the law requires platforms primarily to identify users of *those* ages. The eSafety Commissioner has recently said that “facial age estimation ... is known to have higher error rates for children near the age threshold of 16 years” (SCB 1197).
54. In fact, the Commonwealth’s report understated the issues with the technology. In March 2026, 438 scientists, researchers and academics from 32 countries outlined significant technical, privacy and societal concerns associated with large-scale age verification requirements, and called for a moratorium on deployment of plans until scientific consensus on the feasibility, benefits and harms of age assurance technologies settles (SC [389]). They argued that current age verification and estimation technologies are not ready for large-scale mandatory deployment; that technologies are relatively easy to bypass, and would require the implementation of complex global infrastructure that does not yet exist to be successful; and that large-scale age verification could increase sensitive data collection and undermine privacy. In addition, an academic study from 2024 found that “age estimation solutions from facial scans cannot ever be expected to achieve acceptable levels of accuracy” and “the systems being proposed to automate age verification are unworkable” (SCB 2435).
55. The effectiveness of Pt 4A is further undermined by the availability of means to bypass the age assurance technology. It is possible for an Australian user under 16 to: rely on a VPN (using free or inexpensive software) to access the platform by appearing to be from outside Australia; use an adult’s device, email or account to access the platform; or use an adult’s face or another image to circumvent facial age estimation technologies (SC [388]).
56. The evidence so far is that the effectiveness of the ban has been limited. In March 2026, the eSafety Commissioner reported that “many children”, or a “substantial number”, aged under 16 still have their accounts or can create new accounts (SCB 1191). In particular, around 7 in 10 parents reported that their child still had an account on four of the platforms, and 1 in 2 reported that their child still had an account on YouTube (SCB 1194). In addition, a University of Chicago report based on a survey of 746 teenagers four months after the

Amendment Act came into force found that “compliance is low: approximately 27% of banned 14-15 year olds comply”, “[t]he social environment around [social media] use has barely moved: most banned teens believe that their peers are still using banned platforms and cite social reasons for continuing use”, and “[a]mong 14-15 year olds subject to the ban, 63.8% report past-week use of a banned platform” (SCB 2454-2456). The report also found that “75% of banned teens consider circumventing the restrictions easy or very easy” and that “the most common workarounds are entering a false birthdate at sign-up (44%), lying about age on verification prompts (57%), using a parent’s or older sibling’s account (42%), and routing traffic through a VPN (30%)” (SCB 2458).

(3) The identified risks of harm do not justify the burden

57. The Commonwealth seeks to justify the law on the basis of harms that may not even be caused by use of social media, with or without an account. There is no scientific consensus about whether there is a causal link between social media use and particular harms which are said to be associated with social media use and, assuming that a causal link exists, what pathway any such causal link takes. The studies also indicate that further research is required before any scientific consensus could be reached in relation to those matters (SC [329]). Further, in some cases, the science so far only reveals an “association” between two matters, rather than a causative link between them (SC [345], [347], [360], [366]).
58. In addition, the risks that have been identified are wholly unquantified. The special case records only that the risks are “credible”. The Court does not know whether these are “low” risks or “high” risks. In the absence of that quantification, it is impossible for the Court to determine whether the direct and substantial burden is calibrated to the nature of the risk. That is fatal on a matter on which the Commonwealth bears the onus, particularly where the extent of the burden demands compelling justification.
59. Further, the Court does not know whether the risks are more likely to be attributable to *certain* age-restricted social media platforms as opposed to others. As the special case makes clear, each has different “design features” (see SC [336]). The parties have not identified any peer-reviewed research testing whether any particular design feature (eg “endless feed”), or mode of implementation of that design feature, is more or less likely to lead to persons engaging in addictive, disordered or problematic use of social media when compared to another design feature (eg push notifications) (SC [337]). The causal pathway by which “design features” increase the likelihood that a user will engage with the platform varies depending on the design feature in question (SC [339], see also [370.2]). The research

has not considered whether the likelihood of various identified risks materialising differs depending on the design feature or features in question (SC [349.2], [361.2], [367.2]). For example, in relation to the risk relating to reduced attention span, one of the studies specifically noted that no distinction was made between different social media platforms and that there are studies to suggest differentiation may be important (SC [365]).

60. It cannot be assumed that all platforms pose the same risks equally. Of the design features of apparent concern, Reddit does not have “time-limited content”, the “endless feed” only forms a relatively small part of the overall service (namely the three “feeds”), “autoplay” and “push notifications” can be switched off (if the user has an account), and it is predominantly text-based. It can be readily distinguished from a service like TikTok (for example) where time-limited content, endless feed and video content are *characteristic* of that platform. Yet, Pt 4A applies a blanket restriction to all age-restricted social media platforms wholly unadapted to the propensity of each to cause harm.
61. In addition, the only facts before the Court relate to the use of online platforms with particular design features. As discussed above, some design features are available irrespective of whether a user has an account. There are no facts before the Court which suggest that any particular or different risks are associated with the use of online platforms *with an account*. Given that the means chosen to reduce the harm is to ban accounts, there is a clear disjunct between the purpose of the law, the facts put forward to justify the law and what the law actually does.
62. Finally, there is nothing in the special case that links any of the identified risks to Reddit specifically. Reddit was not specifically considered in any of the studies upon which the existence of most of the risks was based: SC [348], [353], [357], [364], [371], [375].
63. The absence of facts justifying the law is unsurprising where it was rushed through Parliament. In the circumstances, the Commonwealth cannot discharge *its* onus to justify the identified burden.²⁴ While “Parliament does not generally need to provide evidence to prove the basis for legislation which it enacts ... its position in respect of legislation which burdens the freedom is otherwise”.²⁵ “[T]he Parliament may have choices but they have to be justifiable choices where the implied freedom is concerned”.²⁶ A burden may not be justified where there is an expert recommendation that further evidence is needed, but that

²⁴ *Hopper v Victoria* (2026) 100 ALJR 582 at [49] (Gageler CJ, Gordon, Jagot and Beech-Jones JJ).

²⁵ *Unions No 2* (2019) 264 CLR 595 at [45] (Kiefel CJ, Bell and Keane JJ).

²⁶ *Unions No 2* (2019) 264 CLR 595 at [45] (Kiefel CJ, Bell and Keane JJ), see also [151] (Gordon J).

recommendation is not heeded and “[i]t is as if Parliament simply went ahead and enacted” the legislation without considering whether it was needed.²⁷ “[I]t is the duty of the Court in every constitutional case to be satisfied of every fact the existence of which is necessary in law to provide a constitutional basis for the legislation”.²⁸

64. The importance of identifying the particular risk addressed by the law in the justification inquiry is illustrated by two overseas decisions. *First*, the French Constitutional Council recently held that a ban on social media for people under 15 was unconstitutional.²⁹ It found that the prohibition was likely to apply to online communication services without any established risk to health and safety (at [13]). It also placed significance on the inability of a parent, duly informed of the risks, to lift or modify the ban in the best interests of their child and found that the prohibition did not require any particular assessment of the risk to the minor, taking into account their age, degree of maturity, family situation or nature of the relevant service (at [15]-[16]). In those circumstances, the provisions were not “appropriate, necessary and proportionate to the objective pursued” (at [18]).
65. *Secondly*, in *Brown v Entertainment Merchants Association*,³⁰ the Supreme Court of the United States (Scalia J, joined by Kennedy, Ginsburg, Sotomayor and Kagan JJ) held that a law prohibiting the sale or rental of “violent video games” to minors failed “strict scrutiny” and was therefore constitutionally invalid. California acknowledged that “it cannot show a direct causal link between violent video games and harm to minors”, but submitted that “the legislature can make a predictive judgment that such a link exists, based on competing psychological studies” (at 799). The Court rejected that argument, finding the studies relied upon were largely “based upon correlation, not evidence of causation” (at 800). The Court also found that the law, insofar as it did not regulate other content, “is wildly underinclusive when judged against its asserted justification, which in [the Court’s] view is alone enough to defeat it” (at 802). The Court said that “[u]nderinclusiveness raises serious doubts about whether the government is in fact pursuing the interest it invokes” (at 802, also 805). While First Amendment jurisprudence cannot be translated to the Australian context directly, this decision is consistent with the “calibration” inquiry adopted by the Court – a very substantial

²⁷ *Unions No 2* (2019) 264 CLR 595 at [117] (Nettle J).

²⁸ *Communist Party Case* (1951) 83 CLR 1 at 222 (Williams J); see also *Unions NSW v New South Wales* (2023) 277 CLR 627 at [31] (Kiefel CJ, Gageler, Gordon, Gleeson and Jagot JJ).

²⁹ Decision No. 2026-911 DC of August 14, 2026.

³⁰ 564 US 786 (2011) at 799.

burden on the freedom demands compelling evidence in order to be justified.³¹

(4) Alternatives to the ban

66. It is impossible for Pt 4A to be “reasonably appropriate and adapted” where there are a number of obvious and compelling alternatives that would have achieved Parliament’s purpose to the same or a similar extent but with a lesser burden.³² It is sufficient that there are “other less drastic means by which the objectives of the law could be achieved”.³³
67. **Modify the affected platforms:** One alternative is a law limited to electronic services that can only be used with an account, or services where the substantial proportion of the functionality is accessible only with an account. The law would exclude services like Reddit or YouTube where almost all of the content can be accessed irrespective of whether or not the user has an account. This would involve a more rational connection between the law and its purpose, since the ban on the account would actually stop access to the relevant content and design features. Such a connection does not presently exist, given the impact on banning accounts varies widely among the ten platforms, particularly as to accessibility of content.
68. **Regulate the content:** Another alternative would be to regulate the content itself, rather than access to the content. This approach has already been adopted in Australia. The *Online Safety (Basic Online Safety Expectations) Determination 2022* (Cth) sets “expectations” that the provider will take reasonable steps to ensure safe use of online services, including “to ensure that the best interests of the child are a primary consideration in the design and operation of any service that is likely to be accessed by children” (s 6(2A)). There are also “expectations” in relation to “recommender systems” (s 8B), minimisation of the provision of certain material (s 11), and prevention of access by children to “class 2 material” (s 12), which broadly speaking is content classified as X 18+ or R 18+ (Act, s 107).
69. In addition, the eSafety Commissioner maintains a register of Codes and Standards in relation to the regulation of unlawful and age-restricted material on electronic services.³⁴ The Commissioner has determined the *Online Safety (Relevant Electronic Services – Class 1A and Class 1B Material) Industry Standard 2024* (Cth) and registered the Relevant Electronic Services Online Safety Code (Class 1C and Class 2 Material). The Standard

³¹ *Clubb v Edwards* (2019) 267 CLR 171 at [178]-[180] (Gageler J); see also *APLA Ltd v Legal Services Commissioner (NSW)* (2005) 224 CLR 322 at [56] (McHugh J).

³² *Babet v Commonwealth* (2025) 99 ALJR 883 at [186] (Edelman J) and the authorities cited there.

³³ *Lange* (1997) 189 CLR 520 at 568 (the Court).

³⁴ See <<https://www.esafety.gov.au/industry/codes/register-online-industry-codes-standards>>.

regulates unlawful material while the Code regulates age-restricted material. The Code requires providers to implement specified age assurance and access control measures for Australian end-users under 18 in relation to Class 1C and Class 2 material. This includes content relating to self-harm and suicide, and disordered eating (SC [359], [377]). Reddit considers that it is bound to comply with both instruments (SC [395], [397]). All but one of the reports identified in Part I of the special case identifying risks upon which the Commonwealth relies were published before the commencement of the Code (SC [332]), so the extent to which the Code has already addressed the identified risks is unknown.

70. The Government also intends to regulate online content through enactment of a statutory duty of care for digital platforms. The former Minister for Communications announced that platforms will be required to take reasonable steps to protect others from harm, including harms to young people and mental wellbeing, and the instruction and promotion of harmful practices (SCB 2739). The Department has conducted a consultation process and published an issues paper in May 2026 (SC [401]-[402]). If the Commonwealth wishes to address a problem with content, or design features (such as algorithms or endless feeds) which deliver content to young people, it could address it *directly* as part of this proposal.
71. The regulation of content is the approach adopted in numerous overseas jurisdictions. For example, the *Online Safety Act 2023* (UK) imposes duties requiring service providers to identify, mitigate and manage the risks of harm from “content and activity that is harmful to children” (s 1(2)(a)(ii)) (SCB 2766). Those duties seek to ensure services are “safe by design” and “designed and operated in such a way that ... a higher standard of protection is provided for children than for adults” (s 1(3)(a), (b)(i)) (SCB 2767). In the European Union, the *Digital Services Act 2022* (EU) imposes obligations on providers of online platforms relating to protection of minors (SC [403.2(a)]; see, eg, SCB 3192 (art 28)).
72. ***Regulate or prohibit design features:*** Parliament could also enact a law mandating the use of settings that control or prohibit design features, or control the use of online platforms more broadly. These controls are already available on the devices that are used to access age-restricted social media platforms (SC [419]-[422]). This approach has been adopted overseas. In the US, the *Colorado Healthier Social Media Use by Youth Act* requires a “social media platform” to provide information to users about their engagement on social media, or display a “pop-up or full screen notification” to a user under 18 that they have spent one hour on the platform during a 24-hour period, or that a user has been on the platform between 10pm and 6am, with repeat notifications every 30 minutes (SCB 3306).

The Utah *Minor Protection in Social Media Act* requires social media platforms to provide modified accounts for minors, including “default privacy settings [that] prioritize maximum privacy”, disabling autoplay, endless feed and push notification functionality, and offer the ability to set time limits on use or schedule mandatory breaks (SCB 3278-3279). Finally, the *Social Media Safety Act* in Arkansas requires social media platforms not to engage in “practices to evoke any addiction or compulsive behaviours in an Arkansas user who is a minor”, and to stop push notifications between 10pm and 6am (SCB 3286-3287).

73. **Mandate parental controls:** Lastly, Parliament could enact a law requiring the use of parental control settings to limit or supervise young people’s social media use. These settings already exist on the devices used to access age-restricted social media platforms made by Apple (SC [404]-[410]) and Google (SC [411]-[414]), and the operating systems used on computers (SC [415]-[418]). There are also applications that can be purchased and used by parents (SC [423]-[434]). This approach has been adopted overseas. Many European countries and the UK require parental consent or controls to be implemented (SC [403.2(b), (c)]). Further, in Arkansas, parental consent is required for users under 16 to access a social media account, and platforms must develop an “online dashboard” for parents to view and understand the child’s use habits and provide tools to restrict their access (SCB 3286-3287), see also Florida (SCB 3297-3298) and Utah (SCB 3270). Although the issues with age assurance identified above would remain, any of the alternatives in this section would address the problem more directly and with a lesser burden.

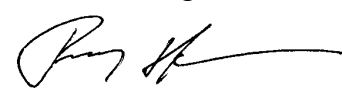
PART VI ORDERS SOUGHT

74. The questions of law (SCB 218-219) should be answered: (1) Unnecessary to answer; (2) Pt 4A is wholly invalid; (3) A declaration that Sch 1, cll 1-7 and 13-16 of the *Online Safety Amendment (Social Media Minimum Age) Act 2024* (Cth) is invalid; (4) the Defendants.

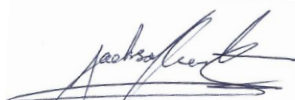
PART VII ESTIMATED TIME

75. Reddit estimates that it will require up to 3 hours for oral argument, including reply.

Dated: 28 August 2026



Perry Herzfeld
Eleven Wentworth
02 8231 5057
pherzfeld@elevenwentworth.com



Jackson Wherrett
Eleven Wentworth
02 8066 0898
wherrett@elevenwentworth.com



Olivia Ronan
Eleven Wentworth
02 8231 5008
ronan@elevenwentworth.com

ANNEXURE TO THE PLAINTIFF'S SUBMISSIONS

No	Description	Version	Provision(s)	Reason for providing this version	Applicable date(s)
<i>Commonwealth</i>					
1.	The Constitution	Current	ss 7, 24	Currently in force	All relevant times
2.	<i>Online Safety Act 2021</i> (Cth)	Current	s 5, Pt 4A	Currently in force	All relevant times
3.	<i>Online Safety (Age-Restricted Social Media Platforms) Rules 2025</i> (Cth)	Current	ss 4A, 5	Currently in force	Since 25 Mar 2026 (s 4A); at all relevant times (s 5)
4.	<i>Online Safety Amendment (Social Media Minimum Age) Act 2024</i> (Cth)	As made	Whole	For illustrative purposes	N/A
5.	<i>Online Safety (Basic Online Safety Expectations) Determination 2022</i> (Cth)	Current	Whole	For illustrative purposes	N/A
6.	<i>Online Safety (Relevant Electronic Services – Class 1A and Class 1B Material) Industry Standard 2024</i> (Cth)	Current	Whole	For illustrative purposes	N/A
<i>Foreign statutes</i>					
7.	<i>App Store Accountability Act 2025</i> (Utah)	Current	Whole	For illustrative purposes	N/A
8.	<i>Digital Services Act 2022</i> (EU)	Current	Whole	For illustrative purposes	N/A
9.	<i>Healthier Social Media Use by Youth Act</i> (Colorado)	Current	Whole	For illustrative purposes	N/A

No	Description	Version	Provision(s)	Reason for providing this version	Applicable date(s)
10.	<i>Minor Protection in Social Media Act 2024</i> (Utah)	Current	Whole	For illustrative purposes	N/A
11.	<i>Online Protection of Minors Act</i> (Florida)	Current	Whole	For illustrative purposes	N/A
12.	<i>Online Safety Act 2023</i> (UK)	Current	Whole	For illustrative purposes	N/A
13.	<i>Social Media Safety Act</i> (Arkansas)	Current	Whole	For illustrative purposes	N/A