

Open Letter to the European Institutions:

Not All Platforms Are the Problem

Excluding the Fediverse and Other Non-Algorithmic Platforms from the EU Kids Act, and Recognising Information as a Public Service Through EU Public Trusted Platforms

To:

- The European Commission (DG CNECT, DG JUST, DG EAC)
- The European Commission's Expert Panel on Online Child Safety
- The European Parliament (Committees on IMCO, LIBE, CULT)
- The Council of the European Union
- The European Data Protection Supervisor (EDPS)

Dear President, Commissioners, Members of the European Parliament, and Distinguished Representatives,

Europe is moving quickly toward stronger protection of children online. Following President von der Leyen's announcement that an EU-wide social media restriction for minors could be proposed this year, the Commission's expert panel on online child safety has delivered its final report, recommending a harmonised access restriction for children under 13 and a phased regime from 13 to 18. These recommendations informed the recent proposal of the EU Kids' Act.



A European Parliament committee has already backed a non-binding call for a default digital minimum age of 16 for social media, video-sharing platforms and AI companions, with parental consent required between 13 and 16. Several Member States (France, Spain, Denmark, Austria, Germany and others) are legislating in parallel.

EUMANS, whose Civic AI campaign advocates for digital technologies that strengthen rather than erode democratic agency, shares the concern that drives this effort. **Addictive design, engagement-maximising algorithms, and the harvesting of children's attention for profit have no place in a healthy digital environment for minors**.

We write, however, to ask that the measure be built on a precise and defensible distinction: between the platforms that cause the harm the EU has identified, and platforms that do not.

The Line Belongs at the Algorithm, Not at the Network

The European Union's own regulatory framework already draws this line. The **Digital Services Act** defines **"recommender systems"** as the automated processes that suggest, rank or prioritise content to users, and its **Article 38** already requires very large platforms to offer at least one version of their feed that is not based on behavioural profiling.

The Commission's own **2025 Guidelines on the protection of minors under the DSA** call on platforms to reduce addictive design features and give users more control over recommender systems; not to eliminate networked communication among young people as such. The evidence base the EU has assembled points squarely at engagement-optimised algorithmic amplification, not at the fact that a service allows people to post, follow, and reply to one another. For instance, Facebook was a crucial enabler of the Arab Springs, Discord sustained the revolts in Nepals, and the recent Albanian Flamingo Revolution is running on decentralised, open source social networks.



Providing access to information beyond traditional intermediaries still represents one of the most groundbreaking democratic promises of social media, together with the possibility of connecting with digital communities that differ from one's given background. While the parental control foreseen by the EU Kids Act will prove extremely difficult to be enforced, anonymous and name-based access to those digital communities can be beneficial, especially for individuals who are members of marginalised communities and minorities.

A restriction that applies indiscriminately to every service that can be described as "social media" would conflate the tool with the harm. It would place a decentralised, non-commercial, chronologically-ordered network in the same regulatory bucket as a platform built to maximise time-on-app for advertising revenue, even though the two present entirely different risk profiles for a child's attention, privacy, and wellbeing. Moreover, it would focus public debate on widespread platforms, rather than promoting a shift towards existing, value-driven, and inherently more democratic alternatives.

In fact, restricting social media overall would miss a crucial point in this debate: that **platforms are responsible for their own algorithms and moderation rules**, even though they cannot be accountable for the content posted by their users. Here is where platforms become **intermediary bodies to access to information**, thus playing a key role in what must be considered a public service, whose rules are determined by public, democratic authorities.

Given that algorithms and moderation procedures are more easily auditable than endless flows of malicious content, **public authorities can and shall decide on the governance of such features**. It is up to democratic institutions to decide who oversees how content is moderated, what values and rights must be enshrined in the very architecture of these platforms, and who has a say on how they are shaped. **Access to information shall be considered as a public service, performed under democratically decided rules**.



The Fediverse Is A Concrete Alternative

The **Fediverse** - the ecosystem of interoperable, open-protocol networks built on ActivityPub, including Mastodon, PeerTube and others - has no single corporate owner monetising attention, no centrally imposed engagement-optimising feed, and defaults to reverse-chronological, follows-based timelines rather than profiling-driven ranking. Moderation is distributed across independently run communities rather than dictated by a single platform's commercial interest in maximising engagement. Its very structure defies the "one-size-fits-all", broadcast approach of BigTech, and enforces a de-centralised, customisable, "multi-cast" logic throughout its whole value chain, embedded in the principles of **interoperability and data portability** across platforms.

This is not a theoretical proposition for the EU institutions themselves. Between 2022 and 2024, the European Data Protection Supervisor ran 'EU Voice' and 'EU Video', a pilot built on Mastodon and PeerTube, hosting accounts for 40 EU institutions, bodies and agencies (including Commissioners and Members of the European Parliament) making EU institutions the largest cohort of public bodies present on the Fediverse worldwide. The EDPS itself described the pilot as proof that public bodies can offer social media that respects fundamental rights as a genuine alternative to platforms owned by a handful of large corporations.

The project closed in 2024 not because it failed, but because no institution took on permanent hosting and funding. We ask that this precedent be built upon, not forgotten, as the Union now legislates on the very risks EU Voice and EU Video were designed to avoid.



Our Request

We ask that the forthcoming legislative proposal:

1. **Define its scope by reference to the presence of profiling-based recommender systems and engagement-optimised algorithmic amplification** - using the DSA's own Article 3(s) and Article 38 as the technical and legal anchor - rather than by an undifferentiated "social media" label; and
2. **Formally exclude, or apply a distinct and proportionate regime to, platforms that do not deploy such systems**, including Fediverse-based services, in recognition of the categorically different risk they pose to minors.
3. **Include youth in the platform design governance**, especially for those features who will affect how minors experience social media.
4. **Promote media pluaralism by accelerating the migration of European Institution's communication activities to the Fediverse**, to lead by example, and incentivise a more democratic and trustworthy public sphere.

Information as a Public Service

There is a second, related principle at stake. **Access to reliable information and participation in public discourse are democratic functions of the same order as public service broadcasting**, which the EU and its Member States have long treated as essential infrastructure rather than a matter to be left entirely to the market.



Today, that same function online has been almost entirely outsourced to a small number of foreign, profit-driven platforms whose design choices are precisely what is now driving this legislation. In other words, a dependency turning unhealthy for adults and even more consequential for the minors who are forming their civic and informational habits on these services.

We support the emerging recognition of this problem within the European debate. Christophe Leclercq, founder of Euractiv (now The Rapporteur), has proposed the development of **Trusted European Platforms**, a **federated ecosystem of platforms for journalism, science, governance and community**, built on the explicit principles that disinformation should not be algorithmically boosted, that identity should be portable without enabling surveillance, and that users deserve tools of agency rather than pure consumption.

In parallel, the European Commission has registered a European Citizens' Initiative, "European Public Social Network," calling for a legislative act establishing a social media platform at EU level, funded by and accountable to the public rather than to advertisers or a single owner.

EUMANS supports the spirit of both initiatives, and we make one addition: neither has to be built from scratch. The Fediverse already provides a working, open, non-extractive protocol layer, and the EDPS's own 'EU Voice' and 'EU Video' project demonstrated that EU institutions can operate it credibly and at scale.

Emerging European projects such as W Social - publicly launched in June 2026 and built, governed and hosted in Europe under EU data-protection law - add to a growing landscape of candidates that should be evaluated on their technical merits, using the same recommender-system test we propose above, rather than assumed to qualify or dismissed by default.



We ask that **the Fediverse, and open-source European initiatives like it, be treated as reference infrastructure** when the EU designs what a genuinely EU Public Trusted Platform should look like. And given that **platforms' algorithms are already the new intermediary bodies for information and democracy**, we also call on the European Union to **design these systems through constitutional, participatory processes**.

Leveraging Existing EU Initiatives

This proposal builds on and connects existing European efforts:

- **EU Kids' Act**, launched in September 2026, and envisaging provisions for banning access to minors, with gradual restrictions from 13 to 18 years old.
- **EU Digital Fairness Act** that is expected to tackle consumer rights online.
- **Digital Services Act (Articles 3(s), 27, 38)** – the existing legal definition of "recommender system" and the right to a non-profiling feed, ready to serve as the technical dividing line for the new proposal.
- **2025 Commission Guidelines on the protection of minors under the DSA** - already identify addictive design and recommender systems, not networked communication as such, as the object of concern.
- **EDPS's 'EU Voice' and 'EU Video' pilot (2022–2024)** - proof that EU institutions can, and did, operate trustworthy, Fediverse-based social media at scale.
- **Trusted European Platforms (EurActiv, Christophe Leclercq)** - a blueprint for federated, non-extractive European digital public space.
- **European Citizens' Initiative "European Public Social Network"** (registered 4 March 2026) - a live, citizen-led mandate for publicly funded social media as a public service.



- **European Digital Infrastructure Consortium (EDIC) for Digital Commons**, developing, maintaining, and scaling digital commons for Europe, pooling resources across member states to reduce technological dependency.
- **European Digital Identity Wallet (eIDAS 2.0)** - the natural, privacy-preserving mechanism for any age-verification requirement the new rules may introduce, without concentrating identity and data in a single commercial gatekeeper.

A Call To Action

We urge the European Institutions to:

1. ### Draw the line at the algorithm, not the network

Define the scope of the minors' access restriction around profiling-based recommender systems and algorithmic amplification, per DSA Articles 3(s) and 38, rather than around an undifferentiated "social media" label.

2. ### Exclude or proportionately treat the Fediverse

Formally exempt, or apply a distinct and lighter-touch regime to, Fediverse-based and equivalent open-protocol platforms that do not deploy engagement-optimised recommender systems.

3. ### Recognise information as a public service

Commit to supporting EU Public Trusted Platforms, building on EurActiv's Trusted European Platforms proposal and the European Public Social Network citizens' initiative.



4. **Build on open, federated protocols already proven at EU level**

Consult the Fediverse, drawing on the EDPS's 'EU Voice' and 'EU Video' precedent, and evaluate emerging European projects such as W Social, rather than commissioning a new closed platform from scratch. Ensure citizens are involved in the design of trusted platforms.

Protecting children online and preserving a plural, trustworthy digital public space are not competing. They are the same goal, pursued at two layers of the same architecture. We ask the European Union not to let a justified fight against addictive, engagement-driven platforms end up disadvantaging the open, federated, non-extractive networks that already embody the alternative Europe says it wants to build.

Let us be clear: EUMANS does not believe these measures alone will end online child abuse or all harms faced by minors on social media. **But they do address a responsibility platforms can no longer evade**: they must **actively transform their systems to reflect their role as stewards of the public sphere**.

This is a vital step forward, which cannot succeed in isolation. Real change also demands progress on content moderation. The paradox? Platforms keep offloading content responsibility onto individual users, despite having **few real tools** to address it themselves.

We stand ready to collaborate with EU institutions, civil society, and the developers of open-source and Fediverse infrastructure to make this vision a reality.

Sincerely,
Marco Cappato - Founder & President, EUMANS
Francesco Vecchi - Civic AI Campaign Coordinator, EUMANS