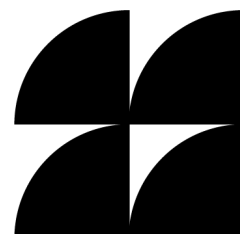


JULY 2026

Measuring Risk II:

What EU Risk Assessments and US Litigation Reveal About Snap and YouTube

Peter Chapman
Matt Steinberg
Knight-Georgetown Institute





About the Knight-Georgetown Institute

The Knight-Georgetown Institute (KGI) is dedicated to connecting independent research with technology policy and design. KGI serves as a central hub for the growing network of scholarship that seeks to shape how technology is used to produce, disseminate, and access information. KGI is designed to provide practical resources that policymakers, journalists, and private and public sector leaders can use to tackle information and technology issues in real time. Georgetown University and the Knight Foundation came together to launch the institute in 2024. Learn more about KGI at <https://kgi.georgetown.edu>.

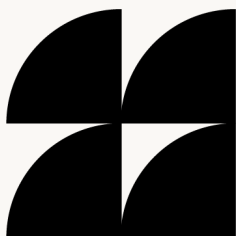


Table of Contents

I. Introduction.....	1
II. Approaches to Platform Risk.....	3
A. The Digital Services Act.....	3
B. Platform Litigation in the United States.....	4
C. Converging Risks in EU Assessment and US Litigation.....	5
III. Assessing the Effectiveness of Platform Mitigations: Snap and YouTube.....	7
A. Snap.....	7
1. Systemic Risk Assessment Mitigations.....	9
2. Insights from US Litigation.....	11
3. Are Snap’s Mitigations Effective?.....	14
B. YouTube.....	22
1. Systemic Risk Assessment Mitigations.....	23
2. Insights from US Litigation.....	25
3. Are YouTube’s Mitigations Effective?.....	27
IV. Toward Effective Risk Assessment: Measuring Problematic Use.....	32
V. Conclusion.....	34
Appendix A. Relevant Legal Documents.....	36
Bibliography.....	39

I. Introduction

Across the United States and European Union, two influential digital governance regimes are producing new bodies of evidence about how large social media companies conceptualize, assess, and respond to risks associated with their platforms.¹ In the EU, the Digital Services Act (DSA) requires major platforms to conduct and publish annual systemic risk assessments, including risks related to the protection of minors.² In the US, hundreds of ongoing lawsuits against social media companies are revealing internal company documents, depositions, and expert reports through discovery. These internal documents provide a window into how platforms identify, measure, and respond to risks.

These two bodies of evidence offer a rare opportunity. EU risk assessments show how platforms publicly characterize risks and mitigation efforts. Litigation records reveal how these same companies internally study user behavior, evaluate product design decisions, and assess trade-offs between safety, engagement, and growth. Reading these records side-by-side makes it possible to examine not only what platforms say about risk, but also the internal steps companies take to prevent and mitigate risk.

This second report in KGI's *Measuring Risk* series focuses on Snap and YouTube. [Measuring Risk I](#) examined Meta and TikTok.³ Both reports use the same comparative lens to examine companies' 2025 EU risk assessments alongside materials disclosed through US litigation, including the multidistrict litigation (MDL) before the Northern District of California and the Judicial Council Coordination Proceedings (JCCP) in California state court.

This comparison arrives at a pivotal moment. In early 2026, two US juries reached landmark verdicts: one finding Meta and YouTube negligent in the design of their platforms⁴ and the other finding Meta liable for failing to protect children online.⁵ These verdicts, together with new trials set to begin later in 2026, mean that the internal research, design decisions, and risk metrics described in litigation are not simply background context: they are increasingly the basis for liability. This raises the stakes for policymakers and researchers to clearly articulate what platforms should measure and disclose in order to demonstrate that their mitigations actually work.

Measuring Risk II finds important gaps between what Snap and YouTube publicly disclose in their EU risk assessments and what has emerged from the US litigation record. Both companies' risk assessments largely focus on content- and user-generated risks, while litigation documents reveal internal attention to risks associated with product design itself, including recommender systems and

¹ The authors would like to recognize the contributions of the KGI team, including Zander Arnao, Alissa Cooper, Claire McCrea, Julie Anne Miranda-Brobeck, and Amy Winecoff.

² Regulation 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), article 34, 2022 O.J. (L 277) 1, <https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>.

³ Chapman and Steinberg, *Measuring Risk*.

⁴ Kang et al., "Meta and YouTube Found Negligent in Landmark Social Media Addiction Case."

⁵ New Mexico Department of Justice, "New Mexico Department of Justice Wins Landmark Verdict Against Meta."

engagement-maximizing product designs, like autoplay or notifications.

Neither YouTube's nor Snap's assessment translates internal company capacity into meaningful findings that regulators or the public can use. Snap's risk assessment does not disclose how many teens or parents actually use Snap's flagship parental-control tool Family Center, nor does it report the usage data needed to evaluate age assurance or design-based risks. Key Snap safety tools were only built after intense external pressure. Indeed, the initial product goal for Family Center "was to have a feature we can point regulators, interested parents, and press to," as opposed to providing a meaningful mitigation.⁶ Unsurprisingly, litigation documents describe that less than 0.33% of Snap's teen users were purportedly enrolled in Family Center.⁷

YouTube's assessment lists take a break, bedtime reminders, supervised experiences, and recommender system safeguards as key mitigations. However, it fails to report adoption, awareness, or outcome data that would let anyone outside the company determine whether they reduce risk. Indeed, internal YouTube communications suggest that YouTube has not evaluated whether screentime reminders actually help users to manage use.⁸ Historically, some products were also not assessed for risks. The launch of YouTube Kids, for example, did not include consultation with experts about potential risks.⁹

The evidence reviewed in this report points to a consistent pattern: platforms possess comprehensive internal data and robust analytical capabilities to understand risks and mitigation effectiveness. This includes both behavioral trace data — records generated through user interactions with digital systems — and self-reported data capturing users' experiences and behaviors. But this data and capability has not translated into effective assessment. The *Measuring Risk* series highlights the need for EU risk assessments to move beyond descriptive inventories of mitigations toward transparent, metrics-driven statements of risk and mitigation effectiveness. While insights generated through US litigation are still emerging and incomplete, they nonetheless highlight the types of data, methods, and benchmarks that should inform more credible, forward-looking platform governance.

This report concludes by describing how to develop more robust measures related to a single risk area: problematic use. The risks of problematic use and addiction are at the center of both EU risk assessments and US litigation. As a result, problematic use is an important area to ensure effective

⁶ Exhibit 897: Family Center Internal Discussion, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.34.pdf>.

⁷ Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment at 135, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California November 21, 2025), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2480.0_1.pdf. Unfortunately, the source exhibit for this citation remains under seal and the Plaintiffs' Opposition does not provide a time period for this statistic.

⁸ Exhibit 732: Teen (Unsupervised) Viewer Wellbeing and Safety, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2754.4.pdf>.

⁹ Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment at 153, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

short- and long-term measurement. Improving measurement and mitigation will not emerge without concerted effort across disciplines and stakeholder groups. Stakeholders should come together to articulate measurement approaches that translate existing academic and company expertise into transparent, comparable, and actionable measurement of risk and mitigation effectiveness.

II. Approaches to Platform Risk

European platform regulation and litigation in the US represent distinct but adjacent approaches to governing and mitigating risks posed by digital platforms. This section describes core requirements of the DSA, how Snap and YouTube have articulated risks and mitigations within their EU risk assessment reports, and how litigation in the US considers risks and harms to minors related to platform design.

A. The Digital Services Act

The DSA requires covered platforms to assess four categories of systemic risks on an annual basis. Required risks include illegal content; negative effects for the exercise of fundamental rights; risks to civic discourse, electoral processes, and public security; and protection of public health and minors, including physical and mental wellbeing.¹⁰ The DSA further requires platforms to adopt “reasonable, proportionate and effective mitigation measures, tailored to the specific systemic risks identified” through the risk assessment.¹¹

Snap’s 2025 DSA risk assessment is organized around four categories of risk: user dissemination of illegal content or content that violates Snap’s terms and conditions, negative effects on fundamental EU rights, negative effects on public security, and negative effects on public health.¹² Within each category, there are multiple subcategories. Under fundamental rights, for example, there are subcategories covering human dignity, freedom of expression, private life, data protection, nondiscrimination, children’s rights, consumer protection, and property. Snap’s risk assessment specifically considers the role of algorithmic systems as well as mitigations focused on the protection of minors.¹³

Google’s 2025 risk assessment analyzes all Google products designated under the DSA, including Search, Maps, Play, Shopping, and YouTube. Google considers DSA risks associated with all products related to illegal content, negative effects on fundamental rights, negative effects on civic discourse, and negative effects related to gender-based violence, public health, and minors.¹⁴ YouTube’s assessment specifically considers risks potentially associated with platform design, including privacy risks and risks to minors.

¹⁰ Digital Services Act, article 34.

¹¹ Ibid., article 35.

¹² Snap, *Snap DSA Report*.

¹³ Ibid.

¹⁴ Google, *Report of Systemic Risk Assessments 2025*.

While YouTube’s and Snap’s assessments include analysis of product design, the assessments primarily focus on content- and user-generated risks. Neither assessment provides the data and metrics necessary for assessing the effectiveness of risk mitigation. The assessments fail to provide evidence or substantiate how particular mitigations actually reduce specific risks. As such, the assessments fail to provide the necessary information for the public, users, and regulators to assess whether mitigation measures meaningfully address the underlying drivers of risk.

Where assessments fall short, the European Commission has investigative powers to enforce compliance. The Commission has issued several requests for information to YouTube and Snap to assess platform compliance with DSA expectations. These requests for information have focused on the platforms’ recommender systems and approaches to the protection of minors.¹⁵ In March 2026, the Commission opened formal proceedings against Snap to investigate if the company is sufficiently providing a high level of safety, privacy, and security for children online.¹⁶

B. Platform Litigation in the United States

The landscape of platform litigation in the US continues to evolve. Juries in two cases have reached landmark decisions against Meta and YouTube. In March 2026, a Los Angeles jury found Meta and YouTube liable for negligence in the design of their platforms in the first JCCP case to reach a verdict.¹⁷ The jury found that YouTube’s and Meta’s design choices were a substantial factor in causing harm to the plaintiff, a young woman who began using Instagram at age 9 and YouTube at age 6.¹⁸ In New Mexico, also in March 2026, another jury found Meta liable for violating state consumer protection laws by failing to protect children from online predators on its platforms.¹⁹ In May 2026, Snap, YouTube, TikTok, and Meta all announced settlements with the Breathitt County School District in Kentucky.²⁰

These cases are representative of the hundreds of court cases against social media companies moving through US courts. The MDL in California consolidates a range of claims against Meta, Snap, TikTok, and YouTube with the “bellwether” cases brought by State Attorneys General set to commence in August of 2026. As described in *Measuring Risk I*, these cases assert a range of claims related to specific harms to minors that arise from platform design. The JCCP and MDL allege that platforms

¹⁵ European Commission, “Commission Sends Requests for Information to TikTok and YouTube under the Digital Services Act”; European Commission, “Commission Sends Requests for Information to YouTube, Snapchat, and TikTok on Recommender Systems under the Digital Services Act”; European Commission, “Commission Scrutinises Safeguards for Minors on Snapchat, YouTube, Apple App Store and Google Play under the Digital Services Act”; European Commission, “Commission Sends Requests for Information to Meta and Snap under the Digital Services Act”; European Commission, “Commission Sends Requests for Information to YouTube, Snapchat, and TikTok on Recommender Systems under the Digital Services Act”; European Commission, “Commission Scrutinises Safeguards for Minors on Snapchat, YouTube, Apple App Store and Google Play under the Digital Services Act.”

¹⁶ European Commission, “Commission Investigates Snapchat’s Compliance with Child Protection Rules under the Digital Services Act.”

¹⁷ Kang et al., “Meta and YouTube Found Negligent in Landmark Social Media Addiction Case.”

¹⁸ The jury found that YouTube’s liability was 30% of responsibility while Meta was 70%.

¹⁹ New Mexico Department of Justice, “New Mexico Department of Justice Wins Landmark Verdict Against Meta.”

²⁰ Kang, “Meta Settles a School District’s Social Media Addiction Lawsuit.”

have deliberately designed their products to promote compulsive and addictive use through extended-use designs (such as infinite scroll and autoplay), broad account visibility, and engagement-optimized recommender systems. States and plaintiffs reference a range of research connecting platform product design to user wellbeing and allege that specific designs can cause or exacerbate serious harms to minors, including sleep deprivation, depression, self-harm, sextortion, eating disorders, and other physical and mental health impacts.²¹

C. Converging Risks in EU Assessment and US Litigation

The risks identified in EU risk assessments and the claims against Snap and YouTube in the US have notable connections. The MDL’s master complaint, for example, makes numerous claims related to the risk of abuse and compulsive use associated with social media products, including specific impacts related to physical and mental wellbeing.²² JCCP complaints similarly allege harms from platform design, including recommender systems.²³ Claims center on specific harms related to physical and mental health, including “depression, self-harm, eating disorders, suicide attempts and ideation, [] [sic] and sleep deprivation.”²⁴ Snap and YouTube explicitly consider most of these risks in their EU risk assessments.

²¹ American Psychological Association, “Potential Risks of Content, Features, and Functions”; Office of the Surgeon General, *Social Media and Youth Mental Health*.

²² Including harms relating “to dissociative behavior, withdrawal symptoms, social isolation, damage to body image and self-worth, increased risky behavior, exposure to predators, sexual exploitation, and profound mental health issues for young consumers including but not limited to depression, body dysmorphia, anxiety, suicidal ideation, self-harm, insomnia, eating disorders, death, and other harmful effects.” See Plaintiffs’ Second Amended Master Complaint, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California December 15, 2023), https://www.motleyrice.com/sites/default/files/documents/social_media_addiction-redacted_master_complaint.pdf.

²³ Complaint for Wrongful Death and Survivorship, and for Violations of the California Unfair Competition Law, Business & Professional Code §§ 17200 et seq., *Rodriguez v. Meta Platforms Inc. et al.*, No. 3:22-cv-00401 (Northern District of California January 20, 2022), https://socialmediavictims.org/wp-content/uploads/2022/01/Rodriguez-Complaint-FINAL-1_21_22.pdf.

²⁴ Complaint for Wrongful Death and Survivorship at 1, *Rodriguez*, No. 3:22-cv-00401.

The following table summarizes connections across the EU risk assessments and US complaints in two domains: protection of minors and mental health and wellbeing.

EU Systemic Risk Area	EU Risk Assessments		US Complaints	
	Snap	YouTube	Snap	YouTube
Protection of Minors	Snap assesses risks of negative effects on minors and references the American Psychological Association's health advisory on social media use in adolescence. ²⁵	YouTube specifically assesses minor's rights, including in relation to illegal content, child exploitation, and potentially addictive behaviors. ²⁶	Complaints allege that Snap's design and business model is focused on minors and is designed to induce compulsive use which results in concrete harm. ²⁷	Complaints allege that YouTube is designed with features that promote compulsive use among minors and enable child exploitation. ²⁸
Mental Health and Wellbeing	Snap assesses risks to physical and mental wellbeing, including mental health, body dissatisfaction, self-esteem, and dangerous pranks or challenges. ²⁹	YouTube assesses the risk that "the interface, design, or features of YouTube stimulate behavioural addictions in minors." ³⁰	Complaints allege that Snap's design has mental health and wellbeing risks and that Snap has failed to warn users about its products' physical and mental health risks. ³¹	Complaints allege that mental health and wellbeing impacts flow from YouTube's design choices, including its personalized recommender system and extended use designs. ³²

²⁵ Snap, *Snap DSA Report*. See also American Psychological Association, *Health Advisory on Social Media Use in Adolescence*.

²⁶ Google, *Report of Systemic Risk Assessments 2025*, 131.

²⁷ Plaintiffs' Second Amended Master Complaint, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

²⁸ *Ibid*.

²⁹ Snap, *Snap DSA Report*, 304.

³⁰ Google, *Report of Systemic Risk Assessments 2025*, 133.

³¹ Plaintiffs' Second Amended Master Complaint, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR. See also Complaint for Wrongful Death and Survivorship at 1, *Rodriguez*, No. 3:22-cv-00401.

³² Plaintiffs' Second Amended Master Complaint, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

III. Assessing the Effectiveness of Platform Mitigations: Snap and YouTube

Documents produced in US litigation speak to the effectiveness of mitigations described by YouTube and Snap in their EU risk assessments. Internal company documents released through litigation provide insights into how platforms track and report on identified risks that are relevant to both EU risk assessment and verification of platform safety claims in the US. This section compares mitigations identified in YouTube's and Snap's risk assessments with evidence that has emerged through US litigation.

A. Snap

Snapchat is a digital messaging and social media platform designed to enable users to communicate with their friends. Snapchat's platform is organized around five elements: Camera, Chat, Map, Discover, and Spotlight.³³ The camera allows users to "share what's on their mind with the people that matter most to them."³⁴ Chat allows users to share messages and pictures. Map allows users to share locations. Discover allows users to follow Stories from broader publishers and creators. Spotlight allows users to watch videos.³⁵ As described above, Snap's EU risk assessment considers four categories of risk: user dissemination of illegal content or content that violates Snap's terms and conditions, negative effects on fundamental EU rights, negative effects on public security, and negative effects on public health.³⁶

Snap's EU risk assessment describes a range of mitigations, many of which are also at issue in US litigation. This section analyzes internal company documentation and expert reports from US litigation related to three elements of Snap's mitigation strategy:

1. The role of platform design in risk and mitigation;
2. Age assurance and age-appropriate experiences, and
3. Family Center and parental control tools.

In comparison to the internal documentation revealed in litigation against TikTok and Meta,³⁷ Snap's litigation record is notable for revealing that key safety domains were under-assessed and that key safety tools were built only due to external pressure. Snap's US litigation record shows that the company treated teenagers as its core audience and most valuable cohort, despite telling EU regulators that "Snapchat services are not primarily directed at or used by minors." Snap's CEO told lawyers that the platform employed no full-time mental health researchers. Snap's head of user

³³ Snap, *Snap DSA Report*, 26.

³⁴ *Ibid.*, 27.

³⁵ *Ibid.*, 27-8.

³⁶ *Ibid.*

³⁷ See Chapman and Steinberg, *Measuring Risk*.

research told lawyers that the company's research team never studied mental health, addiction, or anxiety.

The safety tools Snap did build were shaped by external pressure rather than effectiveness. Snap created Family Center not as a safety intervention, but something to "point regulators, interested parents, and press to." Litigation documents reveal that the feature was purportedly used by just 0.33% of teens. Platform access was permissive and, in December 2021, the company had identified 43 million under-13 users, but only removed less than 3,000 underage accounts. Features linked to compulsive use, including Streaks, Snap Score, and notifications, are not mentioned in Snap's EU assessment, even as internal documents describe Streaks as driving a "compulsive behavioral pattern" and notifications as triggering a sense of "24/7 urgency" to check Snap.

1. Systemic Risk Assessment Mitigations

The following table summarizes key mitigation measures from Snap’s 2025 assessment in relation to recommender systems and online engagement risks.

Select Risk Mitigation Measures	
Ad Restrictions for Minors	Snapchat does not allow advertisements based on profiling for users aged 13-17 in the EU ³⁸ and prohibits ads that “appeal specifically to children under the age of 13.” ³⁹
Age Assurance and Age Gating	Snap describes taking a “risk-based approach to age assurance.” ⁴⁰ Snap initially relies on Apple and Google Play Store requirements for declared age. ⁴¹ Snap then independently asks users to declare their age and does “not use inferred age techniques to prevent individuals under the age of 13 from registering or accessing the app.” ⁴² Snap uses an age inference model “to limit under 18 access to content and features targeted and suited to more mature audiences.” ⁴³
Algorithmic Content Recommendation	Snap describes designs to mitigate risks of amplification of illegal and harmful content. ⁴⁴ Mitigations include automated and human moderation, ⁴⁵ content diversification rules, ⁴⁶ evaluation rooted in satisfaction and retention, ⁴⁷ and options to disable personalized recommendations. ⁴⁸
Community Guidelines Enforcement	Snap’s Community Guidelines prohibit a range of behaviors and content that can raise risks. ⁴⁹ Snap may restrict access for users who engage in repeated or egregious violations. ⁵⁰

³⁸ Snap, *Snap DSA Report*, 457.

³⁹ *Ibid.*, 476.

⁴⁰ *Ibid.*, 287.

⁴¹ *Ibid.*, 457.

⁴² *Ibid.*, 457.

⁴³ *Ibid.*, 462.

⁴⁴ *Ibid.*, 421.

⁴⁵ *Ibid.*, 431.

⁴⁶ *Ibid.*, 431-2.

⁴⁷ *Ibid.*, 432-3.

⁴⁸ *Ibid.*, 423.

⁴⁹ *Ibid.*, 54-55.

⁵⁰ *Ibid.*, 278-9.

Content Authenticity	Snap describes guidelines, policies, and practices to prevent illegal or otherwise violating content created using Snap’s generative AI tools. ⁵¹
Dark Patterns	Snap’s risk assessment describes the existence of a Dark Patterns Design Policy, which design, product, and engineering teams must adhere to when developing, testing, adapting, or deploying new features. ⁵²
Family Center and Parental Control Tools	Family Center is an in-app parental tool that allows parents, caregivers, or trusted adults to view teens’ accounts. This includes opt-in restrictions related to content, AI chatbots, and location sharing. ⁵³
Here For You	User searches for information on specific sensitive topics will direct users to relevant resources, including localized partners, when users search for themes related to “mental health, anxiety, depression, stress, suicidal thoughts, grief and bullying.” ⁵⁴
Prevalence Testing	Snap analyzes a random sample of Public Stories to measure the rate of policy violating content on the platform (Policy Violating Prevalence). ⁵⁵
Privacy Assessment	Snap states that all new products are subject to a Privacy Assessment (PASS Review) that is designed to ensure that user data is not misused. ⁵⁶
Profile and Content Visibility	Users under the age of 15 are defaulted to non-public accounts. ⁵⁷ Users aged 16-17 may opt into a public profile account. ⁵⁸ Snap describes design defaults related to safety, including the fact that all Snap Map users are defaulted to “Ghost Mode,” where location is not shared. ⁵⁹
User Reporting and Blocking Tools	While much of the reporting section is redacted, Snap describes tools to report to Snap’s trust and safety team. ⁶⁰ Snap provides users tools to block certain terms or replies ⁶¹ as well as user accounts. ⁶²

⁵¹ Ibid., 485.

⁵² Ibid., 320.

⁵³ Ibid., 480-1.

⁵⁴ Ibid., 366-7.

⁵⁵ Ibid., 57.

⁵⁶ Ibid., 196.

⁵⁷ Ibid., 475.

⁵⁸ Ibid., 36-7.

⁵⁹ Ibid., 325-6.

⁶⁰ Ibid., 388.

⁶¹ Ibid., 28.

⁶² Ibid., 69

In some areas, Snap’s risk assessment provides more detail than other platforms. The risk assessment notably references academic and civil society research as well as specific internal measurement Snap uses to understand mitigation effectiveness. Snap’s integration of these sources is comparably more robust than its platform peers, such as Meta and TikTok. For example, Snap references internal 2023 and 2025 measurement of the prevalence of self harm content and content promoting dangerous activities.⁶³ The actual metrics are, unfortunately, redacted, but this is a useful example of how platforms should be expected to report on specific risk metrics.

Snap also incorporates references to internal survey research, reporting that “over 90% of our community says they feel happy, connected, and comfortable” while using the product.⁶⁴ Snap has also supported three rounds of its Digital Well-Being Index, which measures experiences of Gen Z social media users across platforms.⁶⁵ The report further references academic research on the impact of messaging apps and social media on user wellbeing.⁶⁶

However, the litigation record also reveals that Snap has chosen to avoid research in key risk areas. These gaps clearly undermine the ability of Snap to understand the nature of risks as well as the effectiveness of mitigation measures.

2. Insights from US Litigation

Snap is a party to hundreds of cases in the United States. Filings, exhibits, deposition testimony, and expert reports released as part of these cases provide insight into Snap’s risks and the effectiveness of its mitigation measures, particularly in relation to minors. Court documents highlight key gaps in Snap’s 2025 EU risk assessment, including Streaks, Snap Score, and notifications.

However, materials released through US litigation do not map neatly onto Snap’s 2025 EU risk assessment. Snap has evolved its safety features in response to external pressure and the evidence referenced may not reflect the current status of platform mitigations. Furthermore, many of the materials disclosed in US litigation may only relate to the US market.

a. How important are minors to Snap’s business?

Snap’s 2025 EU risk assessment provides limited information about the characteristics and demographics of its EU user base. The report states that Snapchat had more than 93 million average monthly active users in the EU as of January 2025, and notes that “community demographics have not seen any significant changes since our previous reports.”⁶⁷ The report further states that “Snapchat services are not primarily directed at or used by minors” and that “only a relatively small percentage of European Union users fall within the 13-17 age category.”⁶⁸ The report does not provide a breakdown of its user base by age or disclose what proportion of its users are minors.

⁶³ Ibid., 304.

⁶⁴ Ibid., 308.

⁶⁵ Snap, “Digital Well-Being Index.”

⁶⁶ Snap, *Snap DSA Report*, 308.

⁶⁷ Ibid., 19.

⁶⁸ Ibid., 469.

Court documents reveal that minors are a critical user group for Snap in the US. Snap's head of product research stated that "our core audience is teenagers."⁶⁹ A product team lead described Snap as the "number one social media app for teenagers in the United States."⁷⁰ Snapchat purportedly reached 90% of the 13- to 24-year-old market in the US by 2023.⁷¹ In a deposition, Snap CEO Evan Spiegel stated that approximately 20% of Snapchat's roughly 450 million daily active users are teenagers.⁷²

Minors are a particularly active demographic. Their attention translates to commercial benefits for Snap. Documents released in litigation reveal that the 13-to-17 cohort was particularly lucrative, generating "the highest average revenue per user during the first 12 months after registration."⁷³ Furthermore, Snap statistics reportedly show that "users aged 13-17 represent nearly 50 percent of the [total] time spent on Snapchat."⁷⁴

Together, these documents raise questions related to Snap's claim that minors are an ancillary audience of its EU user base. Documents produced during US litigation suggest that users aged 13-17 are a central and commercially essential audience for the platform in the US.

b. How are minors using Snap?

Snap's EU risk assessment describes how it tracks metrics related to the average time minors spend on specific Snap features, though the actual statistics are redacted for the public.⁷⁵ Snap also reports that the platform tracks the time of day of product use and that "majority of time is spent in the evening."⁷⁶ While this is comparatively more specific than other EU risk assessments, it would be strengthened by providing more meaningful metrics. Reporting average time spent by feature does not provide a useful picture of risks associated with extended use. Risks are heterogeneous and particular use patterns will correspond to different levels of risk.

Measuring Risk I describes that US litigation documents demonstrate that TikTok and Meta track specific usage patterns across user group percentiles. For example, TikTok disclosed average user time spent by percentile, including the 50th, 66th, 75th, 90th, and 99th percentile of use.⁷⁷ TikTok termed the 99th percentile pattern of use "Objective[ly] harmful usage."⁷⁸ Snap's risk assessment does not provide comparable distributional data. However, Snap's reporting of feature-specific averages

⁶⁹ Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment at 117, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

⁷⁰ *Ibid.*

⁷¹ *Ibid.*

⁷² *Ibid.*

⁷³ *Ibid.*

⁷⁴ *Ibid.*

⁷⁵ Snap, *Snap DSA Report*, 305.

⁷⁶ *Ibid.*, 307.

⁷⁷ Expert Report of Dimitri A. Christakis at paragraph 155, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California December 11, 2025),

<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2534.17.pdf>.

⁷⁸ *Ibid.*

suggest that more granular distributional metrics could easily be generated from the same underlying usage data.

Documents from US litigation offer a more detailed and valuable window into how minors use Snap. As stated above, Snap statistics reportedly show that “users aged 13-17 represent nearly 50 percent of the [total] time spent [by users] on Snapchat.”⁷⁹ Internal documents further suggest Snap is a “daily habit” for nearly 50% of 13-to-17-year-olds.⁸⁰ Snap understands that minors are particularly active on the platform during school hours. Snap’s CEO confirmed that from the platform’s earliest days, Snap server data showed “peaks of activity during the school day and dips on the weekend.”⁸¹ Internal Snap research emphasized how the product was used in school contexts, reporting that 64% of Snapchatters ages 13-21 use Snapchat during school, as visualized in a 2018 presentation:



Figure 1. Exhibit 845: Snap Habits: At school and work, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*.⁸²

c. How does Snap study risks to minors?

Measuring Risk I describes how Meta and TikTok have historically built internal teams focused on understanding user experience and potential risks to users. Internal research conducted by Meta and TikTok assessing risks to minors and other users of the platform plays an important role in the litigation record. In contrast, documents currently produced in litigation with Snap suggest that the company

⁷⁹ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 117, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

⁸⁰ *Ibid.*

⁸¹ Exhibit 803: Videotaped Deposition of Evan T. Spiegel at 112, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.2.pdf>.

⁸² Exhibit 845: Snap Habits, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.7.pdf>. Image quality is reflective of the original.

has not conducted comparable platform-specific internal research focused on risks such as problematic use, depression, or body dysmorphia.

Snap's CEO testified that the company employed no "full-time mental health researchers" (e.g., the psychiatrists, neurologists, or mental health professionals employed by other platforms), stating instead that "I believe we rely on third-party experts."⁸³ Snap's head of user research testified that her team never conducted research related to user experience and mental health.⁸⁴ She further testified that research investigating user experiences related to addiction or anxiety "isn't anything that [the company has] ever done."⁸⁵ Snap's former Lead Safety Product Manager testified that mental health work was "volunteer work," as the company had no dedicated product manager focused on mental health or wellbeing.⁸⁶ As external researchers and peer companies expanded research related to social media risks, the litigation record suggests that Snap did not invest in similar internal research.

3. Are Snap's Mitigations Effective?

Documents from US litigation provide evidence related to several of the mitigations described in Snap's EU risk assessments. Many of the mitigations listed in the EU are cited as elements of safety strategies in Snap's public communications in the US market. In comparison to the documents produced in litigation related to TikTok and Meta, the litigation record for Snap notably lacks robust internal studies. Furthermore, the litigation record shows that many categories of safety tools were built only under external pressure and were internally understood to serve public and regulatory communication purposes rather than meaningfully mitigate risks.

This section evaluates documents related to three elements of Snap's mitigation strategy as described in its 2025 EU risk assessment: Snap's design features, including those that are absent from the risk assessment, age assurance and age-appropriate experiences, and Family Center.

a. Features not included in Snap's assessment

Snap's 2025 EU risk assessment places platform design front and center, stating that "From day one, Snap has made conscious design decisions to mitigate systemic risks from occurring on its platform."⁸⁷ Snap devotes multiple sections of the assessment to design and mitigations, including the company's stated approach of "Privacy and Safety by Design."⁸⁸ The assessment includes a section on physical and mental wellbeing, in which the company acknowledges that behavioral-addiction risks

⁸³ Exhibit 803: Videotaped Deposition of Evan T. Spiegel at 47, 50, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

⁸⁴ Exhibit 827: Deposition of Morgan Hammerstorm at 96, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.5.pdf>.

⁸⁵ *Ibid.* at 98.

⁸⁶ Exhibit 948: Deposition of Juliet Shen at 105, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2760.11.pdf>.

⁸⁷ Snap, *Snap DSA Report*, 319.

⁸⁸ *Ibid.*, 523.

could arise from the use of the product.⁸⁹ It references Snap’s “adoption” of the Age Appropriate Design Code guidance for developers⁹⁰ as well as a description of the “Privacy and Safety by Design” review process.⁹¹ Snap’s focus on design is comparatively stronger than other platforms’ risk assessments.

The assessment nonetheless has several foundational gaps when it comes to Snap’s product and features. First, there is a lack of focus on metrics and evidence which confirm the ways in which specific design features create or mitigate risks for particular user groups. Second, the assessment fails to account for a number of the specific design features which independent research and US litigation link to problematic or extended use. Designs focused on extending product use, in particular, are not analyzed in Snap’s risk assessment, including Streaks, Snap Score, or the role of notifications.

Streaks

Streaks track the consecutive days two users have exchanged Snaps and display a running count that breaks if either user fails to send a Snap within 24 hours.⁹² In US litigation, plaintiffs allege that Streaks drive compulsive and habitual use among minors. In the EU, Streaks are not assessed as a potential risk in relation to the protection of minors or wellbeing.

Internally, Snap considers potential risks associated with Streaks. In 2018, internal Snap research described Streaks as “a main driver” of engagement among minors on the platform because minors take Streaks “extremely seriously due to social pressure.”⁹³ An internal Snap engineering document stated that the “end result” of Streaks was to create “a compulsive behavioral pattern” for Snap users.⁹⁴ An email exchange between Snap executives stated that the company had “tapped into some mass psychosis where 17 million people **must** keep the streaks going.”⁹⁵

Snap knows that Streaks are particularly popular among minors. Internal Snap documents indicate that 41% of US high schoolers maintained an average of 9.5 Streaks and that 47% of Streak users were under 17.⁹⁶ The documents also showed that Streak use peaked at age 16.

⁸⁹ Ibid., 267, 311.

⁹⁰ Ibid., 455.

⁹¹ Ibid., 524.

⁹² Snap, “How Do Streaks Work and When Do They Expire?”

⁹³ Exhibit 1153: Streaks: Master Doc, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 27, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2888.39.pdf>.

⁹⁴ Exhibit 933: Relationships (LOCAL), *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2878.18_1.pdf.

⁹⁵ Exhibit 935: Snapstreak Distribution, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 23, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2762.1.pdf>. Emphasis in original.

⁹⁶ Exhibit 936: Streaks Utility Analysis - High School vs. College Users, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2878.19_1.pdf; Exhibit 935: Snapstreak Distribution, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

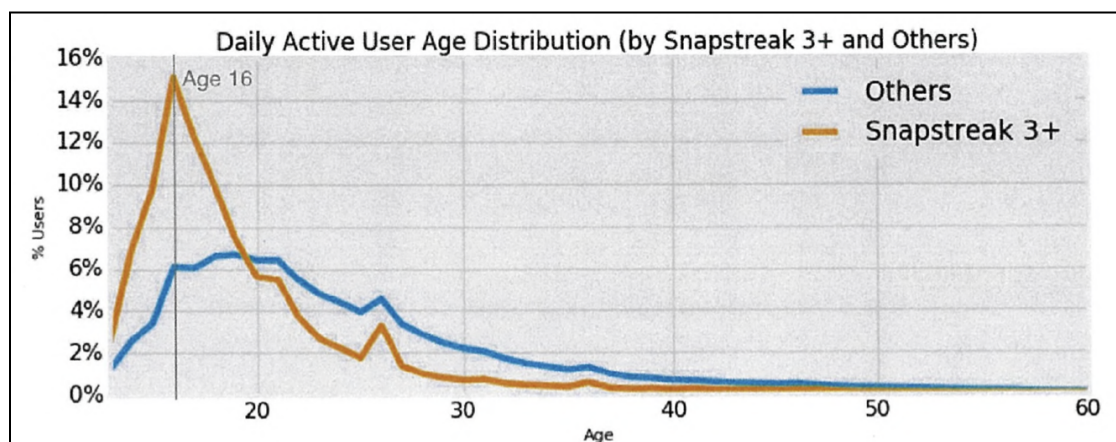


Figure 2. Exhibit 935: Snapstreak Distribution, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*.⁹⁷

In 2023, Snap further monetized Streaks by offering users a paid option to restore broken Streaks.⁹⁸ While redacted, the product strategy reportedly includes specific metrics related to revenue associated with this more direct monetization.⁹⁹

Snap Score

Snap's 2025 EU risk assessment also fails to consider risks associated with Snap Score. Users of Snap are assigned a Snap Score, which the company states is based on "the number of Snaps you've sent and received, the Stories you've posted, and a couple other factors."¹⁰⁰ The stated internal goal of the Snap Score was to make the "user care about (if not become addictive to) their [] score and thus encourage them to produce and consume more [S]naps."¹⁰¹ The product Feature Goals are explicitly tied to engagement.¹⁰²

⁹⁷ Exhibit 935: Snapstreak Distribution, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR. Image quality is reflective of the original.

⁹⁸ Exhibit 937: Streak Restore Deep Dive, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2878.20_1.pdf.

⁹⁹ Ibid.

¹⁰⁰ Snap, "What Is a Snapscore?"

¹⁰¹ Exhibit 812: User score tooltip for New Users, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.7.pdf>.

¹⁰² Ibid.



Figure 3. Exhibit 812: User score tooltip for New Users, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*.¹⁰³

Internal documents suggest that Snap is aware of risks associated with Snap Score, with internal communications suggesting Snap Score served to encourage users to “keep their privacy settings open, accepting strangers’ [friend requests], and participate in shout outs and streaks in order to gain more contacts and views on Snapchat and eventually increase their score.”¹⁰⁴ While privacy risks are evaluated in Snap’s risk assessment, the role of the design of Snap Score is not.¹⁰⁵

Notifications

Snap’s 2025 EU risk assessment does not sufficiently consider whether notifications may contribute to risk. The assessment describes how Snap encourages users in onboarding to turn on notifications.¹⁰⁶ The assessment does not describe how users can restrict push notifications within the app. However, it does suggest that mobile operating systems allow for users to activate bedtime mode that turns off specific notifications or the device as a whole.¹⁰⁷

Other EU risk assessments consider the role of notifications in the protection of minors or mental health. TikTok’s 2025 assessment, for example, considers the role notifications may play in extended use, describing how restrictions on push notifications for minor users are part of TikTok’s strategy to prevent and mitigate online engagement risks.¹⁰⁸

¹⁰³ Ibid.

¹⁰⁴ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 121, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹⁰⁵ Snap, *Snap DSA Report*.

¹⁰⁶ Ibid., 359.

¹⁰⁷ Ibid., 317.

¹⁰⁸ TikTok, *DSA Risk Assessment Report 2025*, 61.

Internally, Snap discusses how the ephemeral nature of its messaging feature drives urgency with users.¹⁰⁹ Snap internally describes notifications as “a powerful lever for growth and engagement.”¹¹⁰ Plaintiffs in US litigation suggest that Snap’s ephemerality was designed to create a “24/7 urgency to be online.”¹¹¹ The ephemeral nature of Snap’s product “require[s] users to develop a daily habit of checking” messages.¹¹² Snap’s own user research identified risks associated with these goals and recommended that the company “consider [] giving users the power to turn off notifications during school hours or when they should be working or studying.”¹¹³ However, a Snap employee deposed in US litigation stated that the company did not allow for minors to restrict push notifications during school hours.¹¹⁴

b. Age assurance and age-appropriate experiences

Snap’s EU risk assessment describes age-appropriate experiences as foundational to its approach to minor safety.¹¹⁵ Many of the mitigations described in the risk assessment, including restricted discoverability for teen accounts, advertising restrictions, and Family Center, depend on Snap correctly identifying which users are minors.¹¹⁶ This makes age-dependent mitigations reliant on the effectiveness of Snap’s age assurance tools. For age assurance to be effective as a risk mitigation, it must have both a high level of baseline accuracy and as well as effective circumvention resistance, among other properties.¹¹⁷ Snap’s risk assessment does not enable meaningful evaluation of either accuracy or circumvention resistance.

Snap’s EU risk assessment details the company’s reliance on multiple age assurance tools. The risk assessment describes how Snap’s approach to age assurance begins with Apple’s and Google’s app store age restrictions at the point of app download.¹¹⁸ Snap then prompts users to declare their age.¹¹⁹ Once a user is onboarded, Snap uses a combination of declared age and inferred age techniques to tailor safe product experiences.¹²⁰ Because age-dependent protections for minors is a critical mitigation, understanding the effectiveness of Snap’s age-assurance systems is essential. Snap’s risk assessment does not report the actual data needed to evaluate protections like age-assurance

¹⁰⁹ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 138, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹¹⁰ Exhibit 914: [Notifs] Fullscreen Takeover Notifications Enable Prompt, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2878.9_1.pdf.

¹¹¹ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 138-9, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹¹² *Ibid.*

¹¹³ Exhibit 849: Social Media - Wellness Perception Research at 6, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.9.pdf>.

¹¹⁴ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 138-9, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹¹⁵ Snap, *Snap DSA Report*, 456-65.

¹¹⁶ *Ibid.*, 458.

¹¹⁷ See Rescorla et al., *Age Assurance Online*.

¹¹⁸ Snap, *Snap DSA Report*, 457-8.

¹¹⁹ *Ibid.*, 458.

¹²⁰ *Ibid.*, 460. Snap does not infer user age at sign up as it is “not feasible without data based on user activity once registered and engaging in the app.”

accuracy (both false accepts and false rejects), the number of suspected underage accounts identified, the number actually removed, and platform-wide removal lag metrics.¹²¹

Documents from US litigation suggest that, for most of Snap's history, the company employed a hands-off approach to user age. Prior to 2013, Snap did not require users to enter their age at registration. When Snap first added a birthday field, it defaulted to the year 2000, making every new account appear to be a teenager.¹²² In 2017, Snap changed the default to age 18, making every new account appear to be an adult. This default remains in place in the US today.¹²³ Internal documents released in litigation describe how minors denied registration for being under 13 could immediately re-register on the same device using a different birthday.¹²⁴ Snap considered implementing lockout periods to prevent this, but rejected this intervention because it could have a “negative impact on daily new users” as well as a “material impact to user acquisition and growth.”¹²⁵

Documents released in litigation reveal the historic prevalence of underage users on Snap. In December 2021, Snap reportedly internally identified more than 43 million users as potentially under 13 years old, though they did not describe the evaluation methods used to ascertain this number.¹²⁶ In the same month, Snap deleted only 2,430 underage accounts, which is a removal rate of approximately 0.006%.¹²⁷

Snap's approach appears to have initially allowed under-13 users to proliferate on Snap. A 2017 report for Snap by research boutique Moffett Nathanson found that “Despite the rules that don't allow those under the age of 13 to be on Snapchat our focus group clearly showed that the middle school set was a rabid — almost exclusively — user of Snapchat.”¹²⁸ Given that Snap knows that its product is particularly popular with young users, one would expect described mitigations to focus on assessment of circumvention resistance.

However, under-13 children on the platform are reportedly removed only if they self-identify or are reported by others.¹²⁹ Internal Snap product managers reportedly discussed the fact that TikTok deleted approximately 20 million underage accounts per quarter while Snap was deleting only 50 per day, suggesting that any external communication of Snap's numbers would be “laughable.”¹³⁰

¹²¹ See Rescorla et al., *Age Assurance Online*.

¹²² Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment at 130-1, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹²³ *Ibid.* at 130-1.

¹²⁴ *Ibid.* at 131.

¹²⁵ *Ibid.*

¹²⁶ *Ibid.* at 132.

¹²⁷ *Ibid.*

¹²⁸ Exhibit 826: MoffettNathanson I SNAP: A Middle School Crush?, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.4.pdf>.

¹²⁹ Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment at 133, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹³⁰ *Ibid.* at 132.

c. Family Center

Snap's 2025 EU risk assessment describes parental supervision through Family Center as a central strategy for risk mitigation.¹³¹ Family Center is mentioned more than 40 times in the report and is described as an in-app feature giving parents or caregivers visibility into their teen's friends list and who they have recently messaged.¹³² Family Center offers parents options to restrict access to specific content tagged as "sensitive" by Snap, disable the option to engage with Snap's AI chatbot, and request their teen's location.¹³³

Snap's risk assessment fails to describe the effectiveness of Family Center as a mitigation. The assessment does not provide details about how many teens or parents are enrolled in Family Center nor any outcome data that would allow readers to evaluate its effectiveness in practice. The assessment does provide a number of screenshots which describe the Family Center user experience and cites a positive reference from Jugendschutz, an independent German agency which promotes the protection of minors online.¹³⁴ The report from Jugendschutz does reference the "positive" emergence of Snap Family Center tools, but it does not evaluate effectiveness.¹³⁵

US litigation against Snap includes a focus on Snap's portrayal of Family Center as an effective safety mitigation tool. Documents released through litigation provide important context on the origins, purpose, and use of Family Center. While Facebook launched a Family Safety Center in the early 2010s,¹³⁶ Snap did not introduce parental controls until 2022.¹³⁷ From the outset, Family Center sought to enable "instructive mediation" between parents and minors in ways that provide "parental/caregiver tools that encourage open conversations."¹³⁸ While instructive mediation is a valuable goal, Snap rejected proposals that would allow parents to more actively help manage minors' privacy settings through Family Center.¹³⁹ In fact, CEO Evan Spiegel intervened to ensure that the goal of Family Center was to provide parents "visibility but not necessarily control" over privacy settings to limit outreach from unknown adults.¹⁴⁰

¹³¹ Snap, *Snap DSA Report*, 480–481.

¹³² *Ibid.*

¹³³ *Ibid.*, 480.

¹³⁴ *Ibid.*, 481.

¹³⁵ Jugendschutz.net, *2022 Bericht*; Jugendschutz.net, *2023 Bericht*; Jugendschutz.net, *2024 Bericht*; Jugendschutz.net, *2025 Bericht*. The authors thank LK Seiling of the Weizenbaum Institute and the #DSA40 Data Access Collaboratory for assistance with reviewing the Jugendschutz reports.

¹³⁶ Kelly, "Facebook Launches Bullying Page in its Family Safety Center."

¹³⁷ Exhibit 853: Deposition of Nona Yadegar at 412-3, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.12.pdf>.

¹³⁸ Exhibit 891: Quick question - FAQ for Family Center at 3, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.31.pdf>.

¹³⁹ Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment at 134, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹⁴⁰ Exhibit 893: Family Center: 12/1/21 Updates, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.32.pdf>.



Figure 4. Exhibit 893: Family Center: 12/1/21 Updates, In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation.¹⁴¹

Internal documentation further suggests that Family Center was understood within Snap as a response to regulatory and reputational pressure. Internal communications, excerpted in Figure 5, suggest that the minimum viable product (MVP) goal for Family Center “was to have a feature we can point regulators, interested parents, and press to.”¹⁴²

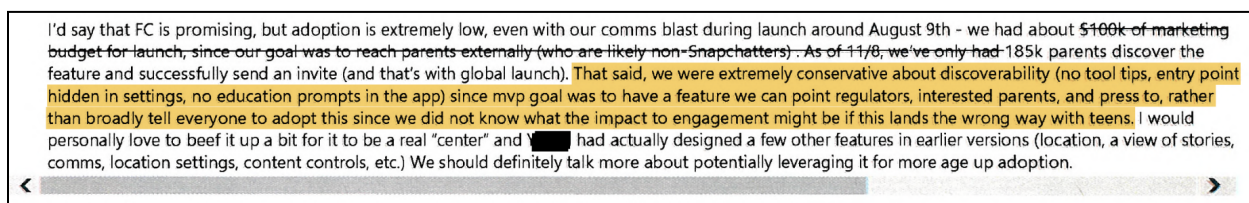


Figure 5. Family Center Internal Snap Messages, Exhibit 897, In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation.¹⁴³

Family Center does not appear to be widely used. Documents released in US litigation indicate that only 0.33% of teenage users were enrolled in Family Center.¹⁴⁴ Litigation documents suggest that Snap did not make Family Center a default feature or proactively communicate how to opt in to the tool. Internal Snap documents suggest that “Family Center is extremely hard to find in the app.”¹⁴⁵

Snap’s EU risk assessment includes the average time minors spend on specific Snap features.¹⁴⁶ These same metrics could be used to communicate some of the impact of Family Center. The risk assessment should report Family Center uptake, usage patterns of users enrolled and not enrolled,

¹⁴¹ Ibid. Image quality is reflected in the original.

¹⁴² Exhibit 897: Family Center Internal Discussion, In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation, No. 4:22-md-03047-YGR (Northern District of California March 25, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.34.pdf>.

¹⁴³ Ibid. Highlighted section added by authors.

¹⁴⁴ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 135, In Re: Social Media Adolescent Addiction, No. 4:22-md-03047-YGR. Unfortunately, the source exhibit for this citation remains under seal.

¹⁴⁵ Ibid.

¹⁴⁶ Snap, Snap DSA Report, 305.

and other measures of its effectiveness. Family Center is not an effective mitigation simply because it exists; it must actually reduce risk in practice for real users.

B. YouTube

YouTube is a global video-sharing platform operated by Google that has billions of users, including a substantial number of minors.¹⁴⁷ In its 2025 EU risk assessment, Google identifies a range of inherent risks that may be associated with the product. Most of the risks identified by Google are associated with content users generate and share on YouTube, including violent, dangerous, sensitive, and graphic content, as well as misleading information.¹⁴⁸ YouTube's risk assessment also includes some focus on the design of the service, such as how YouTube's recommender system presents content to users.

YouTube's litigation record shows how platform design influences behaviors. Features including autoplay, which YouTube executives once called "the single most impactful launch in YouTube history," are linked to nighttime use. Awareness of parental tools like Family Link was reportedly as low as 15% among parents as of 2022. YouTube has, at various points, measured some of the harms its EU risk assessment fails to report, even if the platform's measurement has been partial and inconsistent. Internal strategy documents from 2019 show YouTube capturing a point-in-time snapshot of teen watch time, late-night use, and self-reported regret and sleep disruption at a level of granularity that is not reflected in its EU risk assessment. YouTube's own engineers and researchers described the recommender system as capable of driving an "addiction cycle," and as recently as 2025, internal teams acknowledged they "don't know if" core wellbeing features like breaks and bedtime reminders actually "work." This lack of knowledge was not due to methodological barriers; it was because the company has chosen to not look "too deeply" into the effectiveness of these safety tools.

¹⁴⁷ Google, *Report of Systemic Risk Assessments 2025*, 114.

¹⁴⁸ *Ibid.*

1. Systemic Risk Assessment Mitigations

YouTube’s risk assessments describe a range of risks and mitigation strategies. The following table summarizes select mitigation measures.

Select Risk Mitigation Measures	
Ad Restrictions for Minors	Google prohibits personalized ads on YouTube Kids as well as for users in supervised experiences for tweens. ¹⁴⁹ YouTube further restricts data collection and use for videos that are “made for kids.” ¹⁵⁰
Age Verification	YouTube uses age verification to customize particular experiences, including live streaming. ¹⁵¹ YouTube uses “automated detection systems to find signals ... that indicate that the channel may be owned by a user under the age of 13.” ¹⁵²
AI Watermarking with SynthID	Any content published on YouTube that was created with Veo, Google DeepMind’s video generation model, is embedded with a watermark using SynthID. Users can identify these through a content label that clearly communicates if a piece of content was generated using AI. ¹⁵³
Comment Protections for Minors	Comments are not available on certain types of videos featuring minors, on YouTube Kids, or for embedded videos. YouTube uses automated detection systems to remove potentially predatory comments. ¹⁵⁴
Community Guidelines	YouTube’s Community Guidelines prohibit spam, deceptive practices, sensitive content involving minors, violent or dangerous content, regulated goods, and harmful misinformation, while allowing exceptions for educational, documentary, scientific, or artistic content. ¹⁵⁵
Family Center / Family Link	Family Link provides tools for parents and guardians to manage their child’s experience across Google products, including YouTube. YouTube also maintains a Family Center hub, launched in 2025, to allow parents and guardians to link accounts. ¹⁵⁶

¹⁴⁹ Ibid., 132.

¹⁵⁰ Ibid., 134.

¹⁵¹ Ibid., 14.

¹⁵² Ibid., 133.

¹⁵³ Ibid., 14.

¹⁵⁴ Ibid., 134.

¹⁵⁵ YouTube, “YouTube’s Community Guidelines.”

¹⁵⁶ Google, *Report of Systemic Risk Assessments 2025*, 117.

Information Panels	YouTube creates “information panels” which provide content sourced from independent third parties on queries prone to misleading information, pointing to sources like health authorities, Wikipedia, and the United Nations. ¹⁵⁷
Recommendation Safeguards: Elevating High Quality Sources	YouTube trains its recommender systems to elevate high-quality sources in search results, particularly in sensitive contexts and key moments, including news, politics, and medical information. ¹⁵⁸
Recommendation Safeguards: Repeated Recommendations	YouTube implements safeguards to reduce repeated recommendations of certain types of content, for example comparison of physical features or idealizing certain body types or fitness levels. ¹⁵⁹
Reducing Excessive Screentime	For users who are under 18, take a break and bedtime reminders are turned on by default. YouTube Kids also has integrated screen time tools. ¹⁶⁰
Supervised Experiences	Supervised experiences are offered for pre-teens or teens to access YouTube through a supervised Google Account. Features like comments, uploads, purchases, and live chat are disabled. ¹⁶¹
YouTube Kids	A child-specific YouTube designed to provide safer and simpler experience for minors, with specific tools for parents and guardians ¹⁶²

¹⁵⁷ Ibid., 126.

¹⁵⁸ Ibid.

¹⁵⁹ Ibid., 132.

¹⁶⁰ Ibid., 133.

¹⁶¹ Ibid., 132.

¹⁶² Ibid., 132.

YouTube's risk assessment references some data which is linked to the effectiveness of its mitigation measures. For example, since 2021, YouTube has reported high-level statistics related to its Violative View Rates (VVR), or views of videos that violate YouTube's policies.¹⁶³ The metric "estimates the percentage of total views on YouTube that are of violative videos" and YouTube's risk assessment reports on these metrics.¹⁶⁴ The risk assessment further describes content moderation metrics in relation to specific policies, including spam, harassment, cyberbullying, child safety, promotion of violence and extremism, and violent or graphic content.¹⁶⁵

From a process perspective, the Google assessment also makes reference to external partnerships which are relevant for risk assessment and mitigation. This includes consultations with a range of expert groups, including industry associations, other companies, and civil society organizations.¹⁶⁶

2. Insights from US Litigation

YouTube is a defendant in a range of US litigation and documents from these lawsuits offer insight into YouTube's risks and mitigation effectiveness in relation to minors. The documents released through litigation, however, span multiple years and do not account for all of the features described in the 2025 EU risk assessment. YouTube, like other platforms, has evolved its safety features over the last years. Furthermore, data released in US litigation is a combination of US- and globally-focused information and is not always directly relevant for the EU risk assessment.

The studies and communications released through US litigation nonetheless provide a valuable glimpse into the data and methodologies YouTube uses internally to understand and mitigate risks. These insights can help clarify how to effectively measure and mitigate platform risk moving forward.

a. Who uses YouTube?

YouTube provides minimal public safety reporting on its users and viewing habits. YouTube's press website reports a range of high-level statistics. For example, 20 million videos are uploaded to YouTube each day and YouTube Shorts averages over 200 billion daily views and reports billions of monthly users.¹⁶⁷

Minors are a key YouTube audience. Ninety percent of American teens report using YouTube, with 15% reporting that they use the platform "almost constantly."¹⁶⁸ Children under 13 are also a key demographic for YouTube, with YouTube Kids launching in 2015 with a specific goal of engaging users under the age of 13.¹⁶⁹ YouTube Kids' early growth strategy was for the platform to "become a daily tool for all [under thirteen year old] kids globally," as visualized in an internal 2017 presentation:

¹⁶³ Ibid., 124.

¹⁶⁴ Ibid.

¹⁶⁵ Ibid., 129.

¹⁶⁶ Ibid., 42.

¹⁶⁷ YouTube, "YouTube for Press."

¹⁶⁸ Faviero and Sidoti, "Teens, Social Media and Technology 2024."

¹⁶⁹ Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment at 152, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

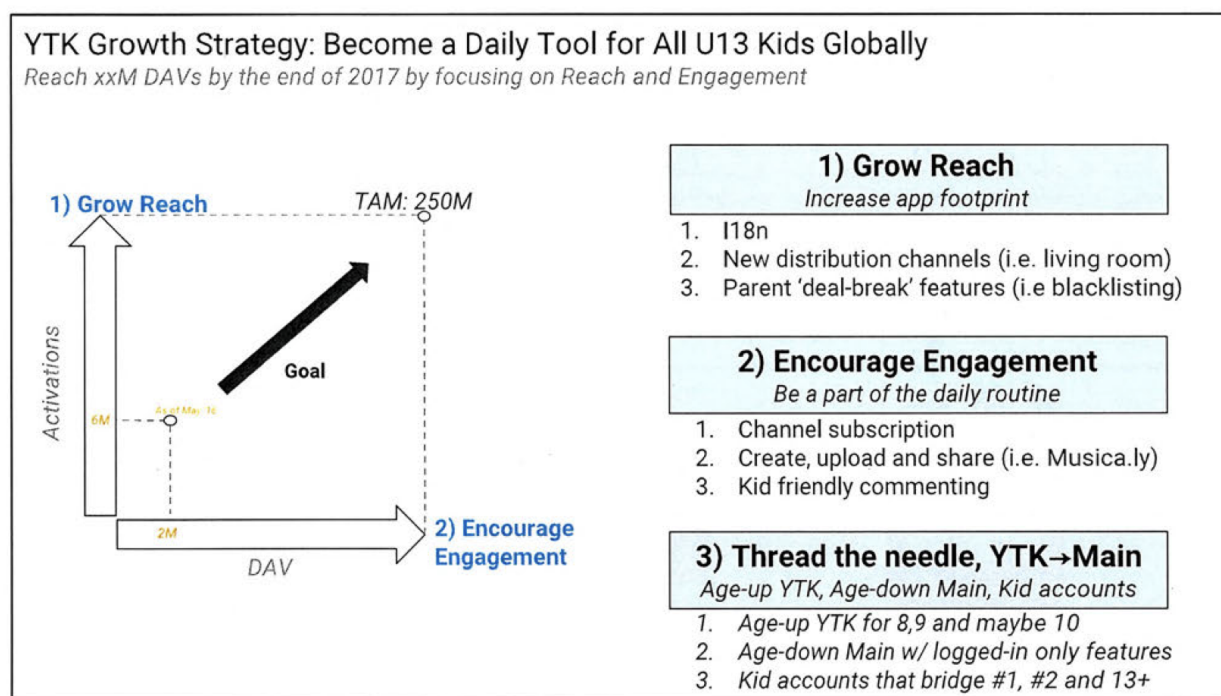


Figure 6. Exhibit 703: YouTube Kids: Vision and Strategy, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*.¹⁷⁰

b. How are minors using YouTube?

Documents produced through US litigation include granular data related to how minors use the platform. A series of documents produced for a 2019 strategy meeting provides a valuable, point-in-time glimpse into the data that YouTube collects.¹⁷¹ The document references a number of internal statistics, including that US teens watch an average of 88 minutes of YouTube per day.¹⁷² The strategy document discusses viewing habits, stating that approximately 10% of 13-24-year-olds watch more than 2 hours of YouTube a day and that 7% of teens watch YouTube after midnight on school nights.¹⁷³ The presentation also references user survey data stating that 13% of 13-24-year-olds report regret related to their YouTube use and 30% say that time spent on YouTube has cut into their sleep.¹⁷⁴ The presentation summarizing these findings is excerpted below:

¹⁷⁰ Exhibit 703: YouTube Kids: Vision and Strategy, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 24, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2870.8.pdf>.

¹⁷¹ Exhibit 772: YouTube 2019 Strategy Offsite Two Pagers, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 26, 2026), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2882.38_1.pdf.

¹⁷² *Ibid.*

¹⁷³ *Ibid.*

¹⁷⁴ *Ibid.*

- *Habitual heavy use:* ~10% (32MM) of 13-24 year olds on YouTube habitually⁷ watch > 2 hours / day (excluding music).⁸ ~13% (36MM) of 18-24 year olds reported "I regret how long I stayed on YouTube" in the past week.
- *Late night use:* ~7% of teens on YT watch past midnight on school nights. Teen "night owls" were 88% more likely to have emotional & behavioral problems ([article](#), [study](#)). 30% of users 18-24 say YouTube has cut into sleep.
- *Unintentional use:* Among users 18-24 years old, 23% report "losing track of time on YouTube,"⁹ 20% report "procrastinating on YouTube," and 20% report YouTube "interfered with work, school, or homework."

Figure 7. *Digital Wellbeing Problem Statement and Background, YouTube 2019 Strategy Offsite, Exhibit 772, Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment.*¹⁷⁵

This 2019 strategy document shows that YouTube has been collecting detailed data about user habits for many years, including average daily viewing time by age group, the share of teens watching past midnight, self-reported regret, and sleep disruption. YouTube is clearly capable of assessing risks to minors, mental health, and wellbeing that the DSA requires. For YouTube's risk assessment to be meaningful, it should incorporate actual metrics, including those from the 2019 strategy, such as the average and distribution of daily watch time by age band, nighttime and late-night usage patterns, and session-length outliers, among others.

3. Are YouTube's Mitigations Effective?

YouTube's EU risk assessment describes a range of risk mitigations. Many of the risks and mitigations in the EU risk assessment feature prominently in US litigation, given that many of the same mitigations are described in YouTube communications in the US market. This section examines evidence emerging in the US related to three elements of YouTube's DSA mitigation strategy: the platform's recommender system, screentime tools, and parental controls.

a. Recommender system

YouTube's risk assessment describes mitigations focused on risks associated with YouTube's recommender system. Mitigations seek to elevate high-quality sources in search results¹⁷⁶ and maintain safeguards to reduce repeated recommendations of content to support the wellbeing and mental health of young people.¹⁷⁷ The assessment further describes how the surfacing of high-quality content helps to mitigate risks of potentially addictive behaviors in minors.¹⁷⁸

YouTube's recommender algorithm has historically been optimized to maximize users' watch time, even if, in the words of one senior engineer, this meant "essentially ignoring the initial intention the user had when coming to YouTube."¹⁷⁹ Internal YouTube documents highlight tensions between its recommender system as a driver of engagement and risks to broader wellbeing. For example, 2019

¹⁷⁵ Ibid. Image quality reflects the original document.

¹⁷⁶ Google, *Report of Systemic Risk Assessments 2025*, 126.

¹⁷⁷ Ibid., 132.

¹⁷⁸ Ibid., 133.

¹⁷⁹ Exhibit 767: Thoughts on YouTube Discovery, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 26, 2026), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2882.34_1.pdf.

YouTube strategy documents describe the recommender system as a tool to maximize engagement. Under an internal strategy goal to “increase habitual users,” YouTube sought to “identify diverse interests that drive frequent, regular usage on YouTube and introduce more users to this content, e.g., [] learn which creators or content clusters are likely to increase your engagement, and build the optimal UX to introduce that content.”¹⁸⁰ Beginning in 2016, YouTube also began to measure satisfaction as a metric, alongside its engagement metrics.¹⁸¹ In 2024 and 2025, YouTube launched video sequencing safeguards to prevent repeated recommendations related to sensitive topics.¹⁸²

A 2018 literature review conducted by YouTube’s internal research team highlighted external research linking YouTube’s recommendation system to habitual or excessive use.¹⁸³ The internal presentation describes how recommendations could contribute to an “addiction cycle,” visualized below:

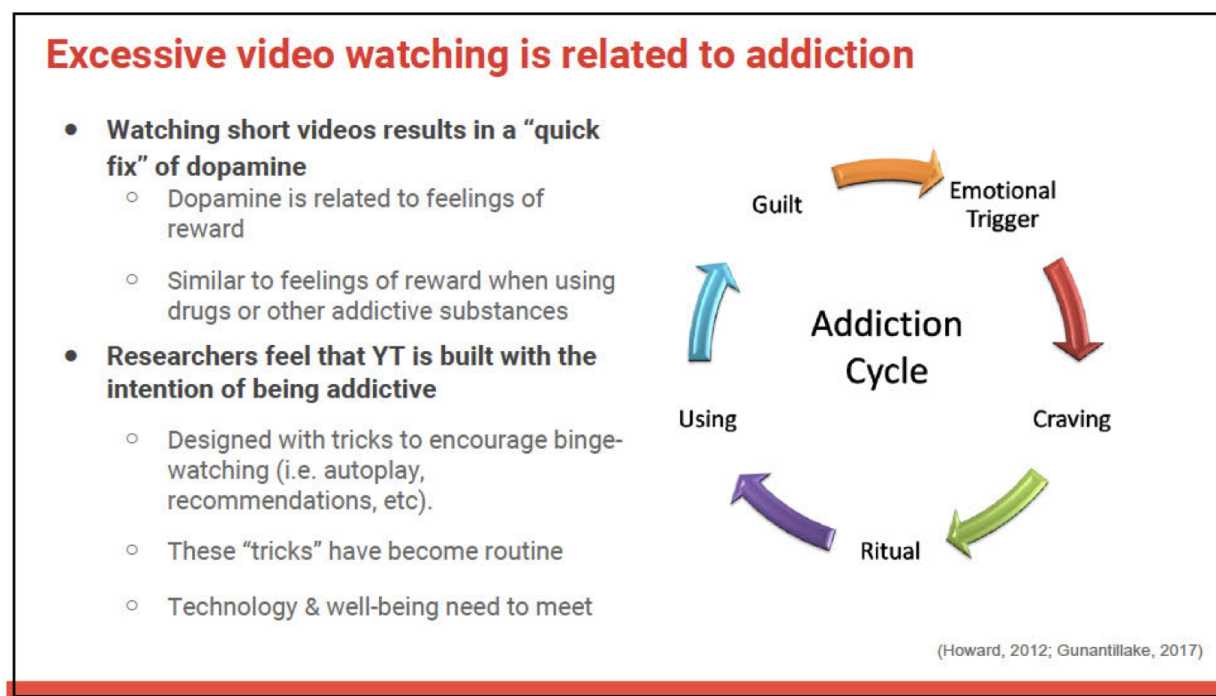


Figure 8. Exhibit 775 YouTube UX Research, Literature Review: Effects of Watching Digital Videos on Viewer Well-Being, In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation.¹⁸⁴

By 2024, internal strategy described how the prevalence of “low quality content recommendations that can convey & normalize unhealthy beliefs or behaviors” was one of “the biggest challenges for teen

¹⁸⁰ Exhibit 772: YouTube 2019 Strategy Offsite Two Pagers, In Re: Social Media Adolescent Addiction, 4:22-md-03047-YGR.

¹⁸¹ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 169, In Re: Social Media Adolescent Addiction, No. 4:22-md-03047-YGR.

¹⁸² YouTube, “Investing to protect teen wellbeing.”

¹⁸³ Exhibit 775: YouTube UX Research, Literature Review: Effects of Watching Digital Videos on Viewer Well-Being, In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026),

<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2754.21.pdf>.

¹⁸⁴ Exhibit 775: YouTube UX Research, Literature Review: Effects of Watching Digital Videos on Viewer Well-Being, In Re: Social Media Adolescent Addiction, No. 4:22-md-03047-YGR.

wellbeing on YouTube.”¹⁸⁵ YouTube’s Wellbeing Vision identifies four primary behaviors driving negative wellbeing effects and articulates an internal measurement strategy combining user perspectives and observed platform behaviors, as visualized below:¹⁸⁶

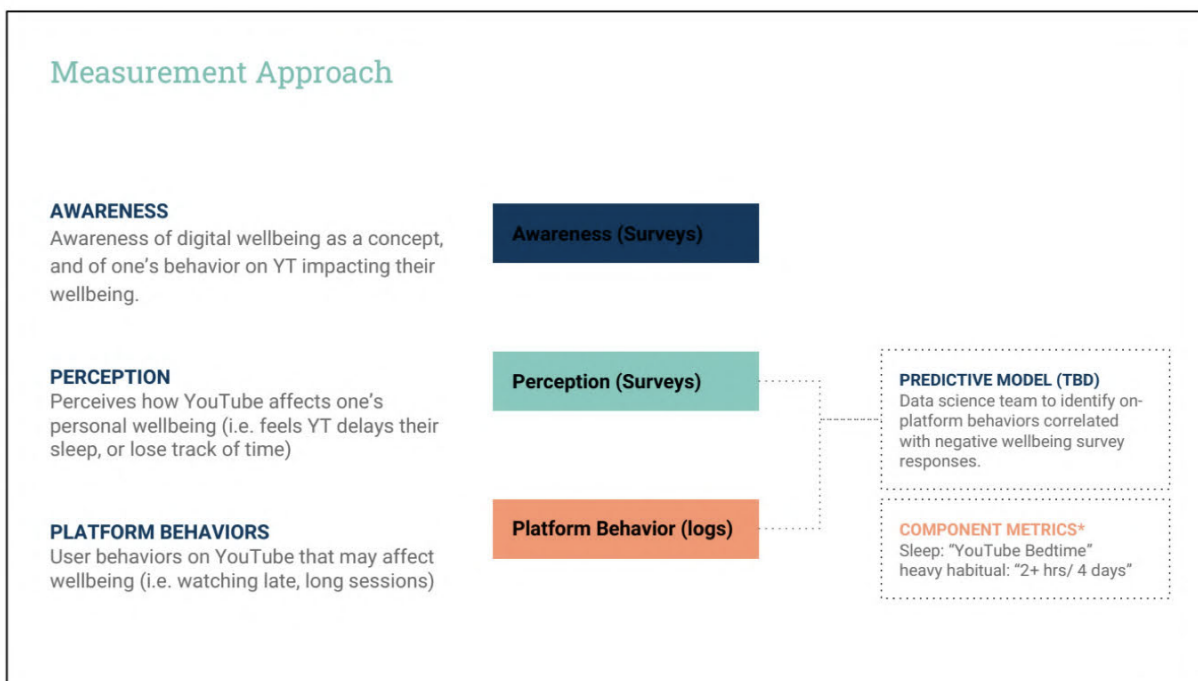


Figure 9. Exhibit 738: YouTube Wellbeing Strategy Measurement Approach, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*.¹⁸⁷

Despite a growing interest in measurement of wellbeing, YouTube’s EU risk assessment does not integrate insights generated through its measurement. It describes several mitigations related to recommender system design without demonstrating their effectiveness. To close this gap, YouTube’s risk assessment should integrate outcome-based metrics related to recommender system design, user satisfaction, and wellbeing. Without this kind of actionable transparency, the risk assessment fails to consider whether YouTube’s mitigations meaningfully reduce risks to the protection of minors and mental health and wellbeing.

¹⁸⁵ Exhibit 732: Teen (Unsupervised) Viewer Wellbeing and Safety, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹⁸⁶ Exhibit 738: YouTube Wellbeing Vision, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 26, 2026), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2882.19_1.pdf.

¹⁸⁷ Exhibit 738: YouTube Wellbeing Vision, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

b. Screentime tools

YouTube’s EU risk assessment identifies “the risk that YouTube stimulates behavioural addictions in minors”¹⁸⁸ and suggests that “avoiding excessive screen time is important.”¹⁸⁹

For users under 18, the assessment reports that “take a break” and “bedtime reminders” are turned on by default. These features are “aimed at reinforcing healthy screentime habits,” and the assessment notes that YouTubeKids includes a “built-in timer” that “lets parents limit screen time by telling kids when it’s time to stop watching.”¹⁹⁰ The assessment does not, however, evaluate or communicate whether YouTube’s interface and product design may contribute to risks to minors’ wellbeing.

Screentime Reminders

YouTube’s EU risk assessment describes how “take a break” and bedtime reminders help to reduce excessive use among minors. Reminders are designed to encourage “more active choices by recipients of YouTube’s service about how they want to spend their time online.”¹⁹¹

The assessment does not provide any details related to user adoption rates, effectiveness, or evidence that the reminders reduce the specific behaviors they are purportedly designed to address. Recent internal documents suggest that YouTube does not evaluate mitigation effectiveness with the same focus as engagement goals. A discussion of 2025 teen wellbeing goals, for example, stated that “We don’t know if our break and bedtime reminders ‘work’ (and haven’t looked too deeply).”¹⁹²

Data is essential for knowing whether YouTube’s screentime mitigations are working. Documents from US litigation indicate that YouTube has studied some relevant behaviors. The internal YouTube Wellbeing Vision identifies four video-watching behaviors that “bring about the majority of negative wellbeing effects,” including “Late Night Use, Habitual Heavy Use, Unintentional Use, and Problematic Content.”¹⁹³ The presentation highlights the strength of scientific evidence related to late-night use, describing effects on sleep quality and duration, mental stimulation, mood, and displacement of other behaviors.¹⁹⁴

YouTube tracks some of these behaviors at the cohort level. Internal studies discussed as part of YouTube’s 2019 strategy found that approximately 7% of teens on YouTube watch past midnight on school nights, and that 30% of users ages 18-24 say YouTube has cut into sleep.¹⁹⁵ Internal analytics found that teen viewing peaked at 6–8PM and continued across devices from 8–11PM. Among the 18–24 cohort, approximately 13% (some 36 million users) said that they “regret[ted] how long [they]

¹⁸⁸ Google, *Report of Systemic Risk Assessments 2025*, 131.

¹⁸⁹ *Ibid.*, 133.

¹⁹⁰ *Ibid.*, 133-134.

¹⁹¹ *Ibid.*, 134.

¹⁹² Exhibit 732: Teen (Unsupervised) Viewer Wellbeing and Safety at 11, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹⁹³ Exhibit 738: YouTube Wellbeing Vision, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹⁹⁴ *Ibid.*

¹⁹⁵ Exhibit 772: YouTube 2019 Strategy Offsite Two Pagers, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

stayed on YouTube” in the past week and 23% said they were “losing track of time on YouTube.”¹⁹⁶ A further 20% reported YouTube “interfered with work, school, or homework.”¹⁹⁷ While YouTube did not offer many of its screentime tools at the time of this analysis, it underscores the types of data that YouTube is collecting to understand the effectiveness of their product and mitigations. The US litigation record suggests that YouTube could readily collect the data necessary to know if the mitigations described in their EU risk assessment work.¹⁹⁸

Autoplay

Specific product features may be in opposition with screentime management tools. The autoplay feature, for example, is explicitly designed to promote additional watch time. When YouTube launched autoplay in 2015 it did so with the expectation that default autoplay would “generate more WT [watch time].”¹⁹⁹ The feature was successful. Autoplay immediately increased desktop watch time by 8% and overall watch time by 4%.²⁰⁰ At the time, executives called it “the single most impactful launch in YouTube history.”²⁰¹

YouTube came to understand that autoplay could contribute to excessive use and wellbeing impacts among minors. YouTube’s internal research purportedly found that autoplay was particularly resonant at night, with autoplay’s share of watch time roughly doubling at night.²⁰² To address this risk, YouTube turned autoplay off by default for users ages 13-17 in 2021.²⁰³ Documents from US litigation, however, suggest that the design of this change undermined its effectiveness. The autoplay toggle was described internally as “very prominent” and “easy-to-understand,” making it simple for teens to re-enable.²⁰⁴ Other screentime management tools, by contrast, were purportedly buried in settings and more difficult to navigate.²⁰⁵

YouTube’s EU risk assessment lists a range of mitigations aimed at “Addressing Potentially Addictive Behaviour in Minors,” including built-in limits. What is missing from the list of mitigations is evidence of their effectiveness. Litigation documents reveal that YouTube is tracking the impact of specific features like autoplay. The risk assessment should include metrics related to the percentage of watch time for minors driven by autoplay, including those at night, as well as other relevant indicators.

¹⁹⁶ Ibid.

¹⁹⁷ Ibid.

¹⁹⁸ Exhibit 732: Teen (Unsupervised) Viewer Wellbeing and Safety at 11, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

¹⁹⁹ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 153-4, 165, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

²⁰⁰ Exhibit 765: YouTube Main App, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 26, 2026), https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2882.32_1.pdf.

²⁰¹ Ibid.

²⁰² Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 165-6, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

²⁰³ Ibid. at 166.

²⁰⁴ Ibid.

²⁰⁵ Ibid.

c. Parental controls

YouTube's EU risk assessment describes a range of parental controls aimed at mitigating risks. Google's Family Link feature provides tools for parents and guardians to manage their child's experiences.²⁰⁶ Supervised experiences can disable features including comments, uploads, purchases, and live chat.²⁰⁷ YouTube Kids is described as a platform that enables a safer experience for minors, while also providing specific tools for parents and guardians.²⁰⁸

The risk assessment does not provide details on how widely these tools are used nor whether they are effective. Internal YouTube documents released in US litigation call into question their effectiveness. Family Link was initially accessible only through one's Google account as opposed to through YouTube.²⁰⁹ Awareness of the tools was low, with a 2022 YouTube presentation suggesting that only 15% of parents were aware of Family Link tools.²¹⁰

YouTube's EU assessment presents YouTube Kids, Supervised Experiences, and Family Link as key tools to advance minors' safety. The effectiveness of these tools rest on how widely they are used and whether they are designed and implemented in ways that effectively reduce risk. While YouTube's risk assessment describes available tools available to parents and guardians, it fails to provide meaningful evidence as to how they work in practice.

IV. Toward Effective Risk Assessment: Measuring Problematic Use

The evidence reviewed in this report points to a consistent pattern across Snap and YouTube, mirroring the experiences of Meta and TikTok described in the *Measuring Risk I* report: social media companies possess much of the technical infrastructure and methods necessary to rigorously assess risk and mitigation effectiveness.

Despite these capabilities, companies do not publicly communicate how they assess and measure risk or how risk is effectively mitigated. EU risk assessments and public safety communications remain broadly descriptive: they describe stated company policies, but they do not demonstrate how risks are mitigated. Problematic use and addiction sit at the center of both EU risk assessments and US litigation, making this an especially important area for improved measurement. Strengthening measurement will require concerted effort across stakeholders and disciplines.

²⁰⁶ Google, *Report of Systemic Risk Assessments 2025*, 117.

²⁰⁷ *Ibid.*, 132.

²⁰⁸ *Ibid.*, 132-3.

²⁰⁹ Exhibit 1016: Parent Screen Time Monitoring and Controls in YT, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 26, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2883.6.pdf>.

²¹⁰ Exhibit 1017: Supervision Onboarding for [Redacted], *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California March 26, 2026), <https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2883.7.pdf>.

Independent researchers have long studied problematic use through the components model of behavioral addiction — salience, mood modification, tolerance, withdrawal, conflict, and relapse — which has shaped self-report instruments like the Bergen Social Media Addiction Scale and related efforts.²¹¹ Because independent researchers largely lack access to platform behavioral data, this research relies heavily on self-report tools, which may correlate imperfectly with actual behavior.²¹²

Companies have invested in research that links self-report and behavioral trace data. Meta's internal program combined survey-based self-report data with granular behavioral indicators like passive late-night use.²¹³ YouTube's Wellbeing Vision identifies four behaviors linked to negative wellbeing effects, including Late Night Use, Habitual Heavy Use, Unintentional Use, and Problematic Content.²¹⁴ Even Snap, which has not invested heavily in internal research, tracks feature-level usage by time of day.²¹⁵ None of these companies, however, translate internal capacity into outcome-based reporting that would let regulators, courts, researchers, or the public assess whether specific problematic use mitigations actually work.

In the short term, companies should be expected to analyze and report a discrete set of self-report and behavioral trace measures relevant to problematic use. These measures should be integrated into regularly deployed A/B tests of product features as well as self-report data collection. Standardizing a core suite of measures across platforms will strengthen the effectiveness of EU risk assessments and public company communications. Combining self-reported subjective experiences and behavioral trace data could also help identify which subjective experience dimensions are most associated with different behaviors. Achieving standardization will require regulators, researchers, and platforms to converge on a discrete, comparable set of metrics drawn from two complementary measurement traditions: self-report and behavioral trace data. Alignment would give EU regulators and US courts a reliable evidentiary basis for risk mitigation, while giving companies a clearer, shared framework for communicating problematic-use findings to the public.

Longer term, durable progress requires investment beyond any single risk-assessment cycle or court case: a shared definitional framework that reconciles academic learning with the constructs companies already use internally. This will allow companies to build on existing and validated constructs as both research and product features evolve. A common taxonomy would allow for outcome-oriented evaluation of problematic-use to travel across platforms and jurisdictions, rather than remaining locked inside a single company's internal terminology and redacted exhibits. This framework should be paired with predictable, rather than litigation-dependent, researcher access to platform data, as the evidence underlying this *Measuring Risk* series exists only because of discovery in litigation.

²¹¹ Andreassen et al., "Bergen Social Media Addiction Scale."

²¹² Parry et al., "Social Media and Well-Being"; Griffioen et al., "Toward Improved Methods in Social Media Research."

²¹³ Chapman and Steinberg, *Measuring Risk*.

²¹⁴ Exhibit 738: YouTube Wellbeing Vision, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

²¹⁵ Snap, *Snap DSA Report*, 305.

V. Conclusion

This report examined Snap and YouTube’s 2025 EU risk assessments alongside the internal company documents, depositions, and expert reports emerging from US litigation. The pattern it surfaces closely tracks the one identified in the *Measuring Risk I* report: companies possess sophisticated internal capabilities to measure risk and to evaluate whether their mitigations work. But very little of this measurement capability is reflected in what companies disclose through EU risk assessments or public communication with users, parents, and regulators.

Neither YouTube nor Snap’s assessment translates internal company capacity into meaningful findings the public can use. Snap’s risk assessment does not disclose how many teens or parents actually use Family Center, nor does it report the usage data needed to evaluate age assurance, Streaks, Snap Score, or notifications, despite acknowledging design as central to safety. YouTube’s assessment lists take a break, bedtime reminders, supervised experiences, and recommender system safeguards as mitigations without reporting adoption, awareness, or outcome data that would let anyone outside the company determine whether they reduce risk.

The litigation record in the US reveals a stark lack of oversight. In Snap’s case, internal testimony indicates that entire domains of risk, including mental health and addiction, were not robustly evaluated. A key safety feature, Family Center was conceived internally as fodder for regulators and the press, rather than as a tool built and measured for impact.²¹⁶ In YouTube’s case, internal teams have acknowledged not closely evaluating whether their own break and bedtime reminders work,²¹⁷ even as the company has tracked granular, related behavioral data, such as late-night use and regret, for years.²¹⁸

The two reports in our *Measuring Risk* series reveal that the constraint for credible platform risk governance is not technical capacity but motivation and transparency. Social media companies have already built, tested, and tracked the kinds of metrics that EU risk assessments should include to demonstrate that mitigations are reasonable, proportionate, and effective, as Article 35 requires. What is missing is the expectation, enforced consistently by regulators and reinforced by courts, that companies proactively assess risks, mitigate them, and report concrete metrics rather than the policies that surround them.

Problematic use offers a concrete and tractable place to begin closing this gap. It is a risk that is central in both EU risk assessment and US litigation. But the underlying lesson extends well beyond

²¹⁶ Plaintiffs’ Corrected Omnibus Opposition to Defendants’ Motions for Summary Judgment at 135, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California November 21, 2025).

²¹⁷ Exhibit 732: Teen (Unsupervised) Viewer Wellbeing and Safety, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, No. 4:22-md-03047-YGR (Northern District of California February 20, 2026).

²¹⁸ Exhibit 772: YouTube 2019 Strategy Offsite Two Pagers, *In Re: Social Media Adolescent Addiction*, No. 4:22-md-03047-YGR.

just problematic use. As DSA enforcement matures and US litigation moves from discovery to verdicts and remedies, the opportunity to align platform governance around shared, outcome-based measurement will not last indefinitely. Researchers, regulators, and platforms each hold a piece of what credible measurement requires. Realizing it will depend on whether they choose to put those pieces together before the next round of risk assessments simply repeats the last.

Appendix A. Relevant Legal Documents

Complaint for Wrongful Death and Survivorship, and for Violations of the California Unfair Competition Law, Business & Professional Code §§ 17200 et seq., *Rodriguez v. Meta Platforms Inc. et al.*,
https://socialmediavictims.org/wp-content/uploads/2022/01/Rodriguez-Complaint-FINAL-1_21_22.pdf.

Exhibit 703: YouTube Kids: Vision and Strategy, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2870.8.pdf>.

Exhibit 732: Teen (Unsupervised) Viewer Wellbeing and Safety, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2754.4.pdf>.

Exhibit 738: YouTube Wellbeing Vision, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2882.19_1.pdf.

Exhibit 765: YouTube Main App, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2882.32_1.pdf.

Exhibit 767: Thoughts on YouTube Discovery, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2882.34_1.pdf.

Exhibit 772: YouTube 2019 Strategy Offsite Two Pagers, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2882.38_1.pdf.

Exhibit 775: YouTube UX Research, Literature Review: Effects of Watching Digital Videos on Viewer Well-Being, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2754.21.pdf>.

Exhibit 803: Videotaped Deposition of Evan T. Spiegel, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.2.pdf>.

Exhibit 812: User score tooltip for New Users, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.7.pdf>.

Exhibit 826: MoffettNathanson I SNAP: A Middle School Crush?, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.4.pdf>.

Exhibit 827: Deposition of Morgan Hammerstorm, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.5.pdf>.

Exhibit 845: Snap Habits, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.7.pdf>.

- Exhibit 849: Social Media - Wellness Perception Research, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.9.pdf>.
- Exhibit 853: Deposition of Nona Yadegar, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2759.12.pdf>.
- Exhibit 891: Quick question - FAQ for Family Center, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.31.pdf>.
- Exhibit 893: Family Center: 12/1/21 Updates, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.32.pdf>.
- Exhibit 897: Family Center Internal Discussion, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2871.34.pdf>.
- Exhibit 914: [Notifs] Fullscreen Takeover Notifications Enable Prompt, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2878.9_1.pdf.
- .
- Exhibit 933: Relationships (LOCAL), *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2878.18_1.pdf.
- Exhibit 935: Snapstreak Distribution, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2762.1.pdf>.
- Exhibit 936: Streaks Utility Analysis - High School vs. College Users, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2878.19_1.pdf.
- Exhibit 937: Streak Restore Deep Dive, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2878.20_1.pdf.
- Exhibit 948: Deposition of Juliet Shen at 105, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2760.11.pdf>.
- Exhibit 1016: Parent Screen Time Monitoring and Controls in YT, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2883.6.pdf>.
- Exhibit 1017: Supervision Onboarding for [Redacted], *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2883.7.pdf>.
- Exhibit 1153: Streaks: Master Doc, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2888.39.pdf>.

Expert Report of Dimitri A. Christakis, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,

<https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2534.17.pdf>.

Plaintiffs' Second Amended Master Complaint, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,

https://www.motleyrice.com/sites/default/files/documents/social_media_addiction-redacted_master_complaint.pdf.

Plaintiffs' Corrected Omnibus Opposition to Defendants' Motions for Summary Judgment, *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,

https://storage.courtlistener.com/recap/gov.uscourts.cand.401490/gov.uscourts.cand.401490.2480.0_1.pdf

.

Bibliography

- American Psychological Association. *Health Advisory on Social Media Use in Adolescence*. American Psychological Association, May 2023.
<https://www.apa.org/topics/social-media-inter-net/health-advisory-adolescent-social-media-use>.
- — —. “Potential Risks of Content, Features, and Functions: The Science of How Social Media Affects Youth.” April 2024.
<https://www.apa.org/topics/social-media-inter-net/youth-social-media-2024>.
- Andreassen, Cecilie Schou, J. Billieux, M.D. Griffiths, D.J. Kuss, Z. Demetrovics, E. Mazzoni, and S. Pallesen. “Bergen Social Media Addiction Scale.” *PA PsycTests*. 2016.
<https://psycnet.apa.org/doiLanding?doi=10.1037%2Ft74607-000>.
- Andreassen, Torborn Torshiem, Geir Scott Brunborg, and Stale Pallesen. “Development of a Facebook Addiction Scale.” *Psychological Reports* 110, no. 2 (2012): 501-517.
<https://pubmed.ncbi.nlm.nih.gov/22662404/>.
- Chapman, Peter, and Matt Steinberg. *Measuring Risk: What EU Risk Assessments and US Litigation Reveal about Meta and TikTok*. Knight-Georgetown Institute, February 12, 2026.
<https://kgi.georgetown.edu/research-and-commentary/measuring-risk-what-eu-risk-assessments-and-us-litigation-reveal-about-meta-and-tiktok/>.
- European Commission. “Commission Investigates Snapchat’s Compliance with Child Protection Rules under the Digital Services Act.” March 25, 2026.
https://ec.europa.eu/commission/presscorner/detail/en/ip_26_723.
- — —. “Commission Scrutinises Safeguards for Minors on Snapchat, YouTube, Apple App Store and Google Play under the Digital Services Act.” October 10, 2025.
<https://digital-strategy.ec.europa.eu/en/news/commission-scrutinises-safeguards-minors-snapchat-youtube-apple-app-store-and-google-play-under>.
- — —. “Commission Sends Requests for Information to Meta and Snap under the Digital Services Act.” November 10, 2023.
<https://digital-strategy.ec.europa.eu/en/news/commission-sends-requests-information-meta-and-snap-under-digital-services-act>.
- — —. “Commission Sends Requests for Information to TikTok and YouTube under the Digital Services Act.” November 9, 2023.
<https://digital-strategy.ec.europa.eu/en/news/commission-sends-requests-information-tiktok-and-youtube-under-digital-services-act>.
- — —. “Commission Sends Requests for Information to YouTube, Snapchat, and TikTok on Recommender Systems under the Digital Services Act.” October 2, 2024.
<https://digital-strategy.ec.europa.eu/en/news/commission-sends-requests-information-youtube-snapchat-and-tiktok-recommender-systems-under-digital>.
- — —. “How the Digital Services Act Enhances Transparency Online.” Accessed June 22, 2026.
<https://digital-strategy.ec.europa.eu/en/policies/dsa-brings-transparency#ecl-inpage-lsets8qr>.
- Faviero, Michelle, and Olivia Sidoti. “Teens, Social Media and Technology 2024.” Pew Research Center, December 12, 2024.
<https://www.pewresearch.org/internet/2024/12/12/teens-social-media-and-technology-2024/>.
- Google. *Report of Systemic Risk Assessments 2025*. Google, December 2025.
https://storage.googleapis.com/transparencypart/report-downloads/dsa-risk-assessment_2025-8-28_2025-8-28_en_v1.pdf.
- Griffioen, Nastasia, Marieke van Rooij, Anna Lichtwarck-Aschoff, and Isabela Granic. “Toward Improved Methods in Social Media Research.” *Technology, Mind, and Behavior* 1,

- no. 1 (2020): 24–38.
<https://doi.org/10.1037/tmb0000005>.
- Griffiths, Mark. “A ‘Components’ Model of Addiction within a Biopsychosocial Framework.” *Journal of Substance Use* 10, no. 4 (2005): 191–197.
<https://psycoperu.org/wp-content/uploads/2021/03/griffiths2005-componets.pdf>.
- Howison, James, Andrea Wiggins, and Kevin Crowston. “Validity Issues in the Use of Social Network Analysis with Digital Trace Data.” *Journal of the Association for Information Systems* 12, no. 12 (2011): 767–797.
<https://aisel.aisnet.org/jais/vol12/iss12/2>.
- Jugendschutz.net. *2022 Bericht - Jugendschutz im Internet: Risiken und Handlungsbedarf*. Jugendschutz.net, April 2023.
https://www.jugendschutz.net/fileadmin/daten/publikationen/jahresberichte/jahresbericht_2022.pdf.
- — —. *2023 Bericht - Jugendschutz im Internet: Risiken und Handlungsbedarf*. Jugendschutz.net, July 2024.
https://www.jugendschutz.net/fileadmin/daten/publikationen/jahresberichte/jahresbericht_2023.pdf.
- — —. *2024 Bericht - Jugendschutz im Internet: Risiken und Handlungsbedarf*. Jugendschutz.net, May 2025.
https://www.jugendschutz.net/fileadmin/daten/publikationen/jahresberichte/jahresbericht_2024.pdf.
- — —. *2025 Bericht - Jugendschutz im Internet: Risiken und Handlungsbedarf*. Jugendschutz.net, May 2026.
https://www.jugendschutz.net/fileadmin/daten/publikationen/jahresberichte/jahresbericht_2025.pdf.
- Kang, Cecilia. “Meta Settles a School District’s Social Media Addiction Lawsuit.” *The New York Times*, May 21, 2026.
<https://www.nytimes.com/2026/05/21/technology/meta-settlement-social-media-addiction-lawsuit.html>.
- Kang, Cecilia, Ryan Mac, and Eli Tan. “Meta and YouTube Found Negligent in Landmark Social Media Addiction Case.” *The New York Times*, March 25, 2026.
<https://www.nytimes.com/2026/03/25/technology/social-media-trial-verdict.html>.
- Kelly, Meghan. “Facebook Launches Bullying Page in its Family Safety Center.” *Venture Beat*, October 18, 2012.
<https://venturebeat.com/technology/facebook-bullying-family-safety-center>.
- New Mexico Department of Justice. “New Mexico Department of Justice Wins Landmark Verdict Against Meta.” March 24, 2026.
<https://nm DOJ.gov/press-release/new-mexico-department-of-justice-wins-landmark-verdict-against-meta/>.
- Office of the Surgeon General. *Social Media and Youth Mental Health: The U.S. Surgeon General’s Advisory*. Publications and Reports of the Surgeon General, 2023.
<http://www.ncbi.nlm.nih.gov/books/NBK594761/>.
- Parry, Douglas A., Jacob T. Fisher, Hannah Mieczkowski, Craig J.R. Sewall, and Brittany I. Davidson. “Social Media and Well-Being: A Methodological Perspective.” *Current Opinion in Psychology* 45 (2022).
<https://www.sciencedirect.com/science/article/pii/S2352250X21002293>.
- Rescorla, Eric, Zander Arnao, and Alissa Cooper. *Age Assurance Online: A Technical Assessment of Current Systems and their Limitations*. The Knight-Georgetown Institute, January 29, 2026.
<https://kgi.georgetown.edu/research-and-commentary/age-assurance-online/>.
- Snap. “Digital Well-Being Index - Year Four.” Snap Values. February 2026.
<https://values.snap.com/safety/dwbi>.
- — —. “How Do Streaks Work and When Do They Expire?” Snapchat Support. Accessed June 22, 2026.
<https://help.snapchat.com/hc/en-us/articles/7012394193684-How-do-Streaks-work-and-when-do-they-expire>.
- — —. *Snap DSA Report: Risk Assessment Results and Mitigations*. Snap, August 25, 2025.
<https://images.ctfassets.net/kw9k15zxtrs/1wx>

[6fdS4smqUq0Zy77HAVO/6116435e15a3504d84f2a7b41d7d442b/FINAL_v1_-Redacted-2025_DSA_Risk_Assessment.pdf](https://www.snap.com/privacy/6fdS4smqUq0Zy77HAVO/6116435e15a3504d84f2a7b41d7d442b/FINAL_v1_-Redacted-2025_DSA_Risk_Assessment.pdf).

— — —. “What Is a Snapscore?” Snapchat Support. Accessed June 22, 2026.

<https://help.snapchat.com/hc/en-us/articles/7012326657044-What-is-a-Snapcore>.

Tech Oversight Project. *YouTube: Addiction Inc.* - *MDL Docket Analysis: YouTube*. Tech Oversight Project, March 2026.

<https://techoversight.org/wp-content/uploads/2026/03/TOP-REPORT-YouTube-Addiction-Inc.pdf>.

TikTok. *DSA Risk Assessment Report 2025*. TikTok, August 28, 2025.

<https://sf16-v.a.tiktokcdn.com/obj/eden-va2/za>

[vwwlY_fjulyhwzuyh/ljhwZthlaukilkulzlp/DSA/DSARiskAssessmentReport-TikTokTechnologyLimited-2025.pdf](https://www.fjulyhwzuyh/ljhwZthlaukilkulzlp/DSA/DSARiskAssessmentReport-TikTokTechnologyLimited-2025.pdf).

YouTube. “Investing to protect teen wellbeing on YouTube.” YouTube Official Blog. Accessed July 12, 2025.

<https://blog.google/intl/en-mena/product-updates/connect-communicate/investing-to-protect-teen-wellbeing-on-youtube/>.

— — —. “YouTube’s Community Guidelines.” YouTube Help. Accessed June 23, 2026.

<https://support.google.com/youtube/answer/9288567>.

— — —. “YouTube for Press.” YouTube Official Blog. Accessed June 23, 2026.

<https://blog.youtube/press/>.