

Response to the Consultation Paper on the draft Online Safety (Basic Online Safety Expectations) Amendment Determination 2023

About Eating Disorders Families Australia

Established in 2016 by a group of passionate, highly motivated parents, Eating Disorders Families Australia (EDFA) has grown into a national organisation providing education, support, counselling, and advocacy services to more than 3,000 family members and carers of those living with an eating disorder.

EDFA is proud to be Australia's only national organisation focused solely on families and carers impacted by an eating disorder. EDFA's mission is to enable families and carers to be more effective supports and to be recognised as central to the prevention, early identification and recovery of a loved one with an eating disorder. EDFA is a lived experience, not-for-profit organisation. The majority of the Directors on our Board, including our Executive Director, have their own lived experience as carers of someone with an eating disorder. Many of our volunteer support group facilitators and Facebook community moderators are lived experience carers.

Since 2021, EDFA has been funded by the Federal Health Department to provide its national online support groups for families and carers. Since 2023, EDFA has also received Health Department funding to provide professional, one-on-one, lived experience, online counselling services for families and carers.

EDFA works closely with other eating disorder organisations, including the Butterfly Foundation, the National Eating Disorders Collaboration (NEDC), the Australia and New Zealand Academy for Eating Disorders (ANZAED), the Inside Out Institute, and various state eating disorder organisations.

EDFA has a longstanding record advocating on issues relating to the portrayal of unhealthy body images. We have regularly participated in government and parliamentary processes, including the Select Committee on Social Media and Online Safety in 2022, and the Body Image and Social Media Roundtable at Parliament House in September 2023. EDFA Executive Director Jane Rowan is on the eSafety Expert Advisory Panel.

We are proud of our partnership with the Embrace Collective with whom we recently succeeded in convincing the Australian Curriculum Assessment and Reporting Authority (ACARA) to amend the Australian Curriculum guidelines to remove harmful references to weight, healthy and unhealthy food, and body mass index, which can be triggering for students who have, or are at risk of, eating disorders.

About Eating Disorders

An estimated 1.1 million Australians are living with an eating disorder. There are multiple types of eating disorders, including Anorexia Nervosa, Bulimia Nervosa, Binge Eating Disorder, Avoidant Restrictive Food Intake Disorder, purging disorder, pica, rumination disorder and Orthorexia among others.

While the causes of eating disorders are not fully known, it is considered that certain people are predisposed because of their genetic make-up or the existence of certain personality traits. Eating disorders can be triggered by various environmental factors or stressful events (e.g. bullying). Early intervention is considered key to successful recovery. The prevalence of eating disorders – and the demand for support services – continues to rise. There is an increasing incidence of eating disorders occurring at younger ages (i.e. pre-teen).

Eating disorders are often accompanied by other mental health conditions, such as depression, anxiety, Attention Deficit Hyperactivity Disorder, and suicidality. Significant numbers of people with eating disorders are diagnosed with Autism. Eating disorders can have significant physical impacts on the body, including infertility, bone brittleness, increased risk of heart attack, brain and multi organ failure, and premature death. Anorexia Nervosa – along with Schizophrenia – has the highest mortality rate of any mental health condition, with 20% dying from the disease.

Eating Disorders, the Internet, and Social Media

The impact of harmful internet and social media content on children and adolescents who have, or are at risk of, eating disorders is well established through a strong body of Australian and international research. EDFA provided examples of this research in its January 2022 submission to the Select Committee on Social Media and Online Safety ([Submissions – Parliament of Australia \(aph.gov.au\)](https://aph.gov.au/submissions)).

Since then, a scoping review of 50 studies from 17 countries that was published in March 2023 ([The social media diet: A scoping review to investigate the association between social media, body image and eating disorders amongst young people | PLOS Global Public Health](https://doi.org/10.1371/journal.plosone.0244444)) found that:

“social media usage leads to body image concerns, eating disorders/disordered eating and poor mental health via the mediating pathways of social comparison, thin / fit ideal internalisation, and self-objectification. Specific exposures (social media trends, pro-eating disorder content, appearance focused platforms and investment in photos) and moderators (high BMI, female gender, and pre-existing body image concerns) strengthen the relationship, while other moderators (high social media literacy and body appreciation) are protective, hinting at a ‘self-perpetuating cycle of risk.’”

The scoping review concluded that:

“Social media usage is a plausible risk factor for the development of eating disorders. Research from Asia suggests that the association is not unique to traditionally western cultures. Based on scale of social media usage amongst young people, this issue is worthy of attention as an emerging global public health issue.”

The terrible impact of cyberbullying on young people has received increased public and media attention in recent years, with the tragic suicide of 14-year-old Amy ‘Dolly’ Everett and other high-profile cases in Australia and internationally. The official statistics in the Office of the eSafety Commissioner’s Annual Reports continue to show significant year-on-year increases in complaints about the cyberbullying of children.

In September 2023, the International Journal of Eating Disorders published a study by researchers at the University of California into the association between cyberbullying and eating disorder symptoms ([Cyberbullying and eating disorder symptoms in US early adolescents - Cheng - 2023 - International Journal of Eating Disorders - Wiley Online Library](#)). Using the Adolescent Brain Cognitive Development (ABCD) study which collected data from nearly 12,000 adolescents nationally aged 10-14 years, the research found that:

“cyberbullying victimization and perpetration are associated with eating disorder symptoms. Screening for and providing anticipatory guidance on cyberbullying and eating disorder symptoms in early adolescents may be warranted.”

In May 2021, the International Journal of Eating Disorders published a study by researchers in Norway confirming the association between bullying and binge eating ([The association between bullying and eating disorders: A case-control study - Lie - 2021 - International Journal of Eating Disorders - Wiley Online Library](#)). The research found that:

“individuals with a history of any ED were significantly more likely to have experienced bullying victimization during childhood or adolescence, particularly verbal, indirect, and digital bullying. Bullying prior to ED onset was also significantly more common than bullying within the same timeframe for controls. Further analysis showed that these effects were due to individuals with BN or BED reporting significantly more lifetime and premorbid bullying than controls.”

A priority action of the National Eating Disorders Strategy launched in August 2023 calls on:

“Social media platform providers and media organisations to uphold the use of inclusive language and imagery, act to ensure algorithms support the dissemination of content reflecting diverse bodies and identities, enforce bans on appearance-related abuse, harassment and discrimination, provide support and skill development to moderators and administrators, and employ a diverse workforce.”

Are internet and social media providers doing enough?

One of the inherent issues with eating disorders is they can dominate every waking moment of the person's life, with issues around food, weight, and body size and shape an all-encompassing obsession. The controlling nature of eating disorders draws the person to social media content that validates and reinforces their destructive eating behaviours, in turn strengthening the disorder's physical and mental hold over them.

EDFA's members and Facebook Community users¹ regularly express concern about cyberbullying and the harmful impact their loved ones' internet and social media usage has on their eating disorders. Their concerns vary:

- In some cases, their loved one has been cyberbullied, triggering the initial onset of their eating disorder, a decline in their recovery, or an associated mental health-related episode.

¹ EDFA has a moderated closed Facebook community page for family and carers of loved ones with eating disorders. There are around 2,000 people in the community.

- Certain social media sites like Instagram, Facebook and Tik Tok are regularly cited by parents as being problematic because of their focus on unhealthy body shapes and images.
- The ease of access to websites and online chat groups that actively encourage dangerous eating habits (pro-ana, pro-mia, thin-spiration, what-i-eat-in-a-day) and self-harm.
- On the worst of these sites and groups, users are pressured to engage in dangerous behaviours and are expected to provide evidence that they have done so.
- Young people with eating disorders forming their own online communities on social media platforms, which is problematic if they encourage unhealthy eating or self-harming.
- Overall high levels of social media usage by their loved ones, with young people with eating disorders often isolated from their school and other friends and too unwell to participate in normal adolescent physical activities.

Internet and social media companies claim they take various actions to reduce the harms that their platforms have on young people with eating disorders. However, there is clear evidence that global social media platforms have knowingly allowed these harms to continue unabated for extended periods and been slow to act when valid concerns have been expressed to them. Recently, Meta's CEO, Mark Zuckerberg, apologised directly to parents whose children had been exploited, bullied or driven to self-harm and suicide by social media.

EDFA acknowledges that ridding the internet of all problematic content for people with eating disorders (and related mental health and self-harm issues) may not be realistic, but digital platforms and social media companies should acknowledge the seriousness of these issues and do more to identify and remove problematic content in a timely manner. They need to be more transparent about their algorithms and the actions they are taking to remove bad actors, as well as being more responsive to complaints and proactive in encouraging and directly supporting the development of content that encourages healthy eating and positive and diverse body images.

What needs to be done?

EDFA believes there is a range of actions that can be taken to reduce the harmful impacts of internet and social media usage on young people who have, or are at risk of, eating disorders:

1. Internet and social media providers should be required to remove harmful content that encourages extreme dieting, eating disorders and self-harm. The Basic Online Safety Expectations (BOSE), Industry Codes and Standards should make specific reference to this harmful content.
2. Internet and social media providers should be required to ensure their algorithms, AI and recommender systems do not push harmful extreme dieting, pro-eating disorder and self-harm content to users. This can be done through the BOSE, Industry Codes and Standards.
3. Internet and social media providers should be required to have complaint processes that enable families and carers concerned about the impact of harmful content on their loved ones with eating disorders to have their issues addressed in a timely and effective manner.
4. Internet and social media providers should be required to have zero tolerance for the cyberbullying of children. They should be expected to embed safety-by-design features that identify cyberbullying behaviour in as close to real-time as possible, with policies of

warnings, the immediate locking out of offenders from platforms, and cooperation with policing authorities.

5. The Office of the eSafety Commissioner should require social media providers such as Instagram, Tik Tok, Facebook and You Tube to develop and implement highly visible programs that encourage positive body images and inform users about the risks of harmful eating and extreme body image online content. The Office of the eSafety Commissioner could report annually on the development and implementation of these programs.
6. Broader online safety programs that are taught in schools or available online should reference the risks of online content that promotes unhealthy body images and extreme dieting and provide advice on how to avoid and deal with such content.
7. Funding should be provided for specialised body image-related internet and social media literacy intervention programs that can be used by people with eating disorders and their families and carers. These programs should be developed in partnership with people with lived experience of eating disorders and their families and carers. They could be rolled out through eating disorder organisations such as the Butterfly Foundation and EDFA.

EDFA position on draft BOSE Determination

Eating Disorders Families Australia (EDFA) welcomes the proposed enhancements to the BOSE in the draft Determination. In particular, EDFA supports the proposals to include additional expectations relating to:

1. Generative AI, recommender systems and user controls, and
2. Making the best interests of the child a primary consideration in the design and operation of any service that is used by, or accessible to, children.

Generative AI, recommender systems and user controls

EDFA is concerned about the potential for Generative AI internet tools to be misused to generate content (including images) that are harmful and triggering for young people who have, or are at risk of, eating disorders. Equally, we are concerned these tools could be misused in ways that encourage young people with eating disorders who have associated mental health conditions to consider self-harming or acting upon their suicidal thoughts. It is imperative the additional expectation requires internet and social media providers to have in-built safeguards in their Generative AI to prevent these sorts of dangerous misuses of these tools. In situations where harmful misuses are detected, the Generative AI tool should also be able to generate messages that encourage end users to seek support and should provide support options. EDFA also recognises the importance of educating end users about the risks of using Generative AI tools but sees this as secondary to ensuring these technologies cannot be used in ways that endanger life.

Algorithm-enabled recommender systems can be highly detrimental for young people with eating disorders who have low self-esteem and spend large amounts of time on platforms such as Instagram, Facebook, and You Tube accessing content about unhealthy weight loss and body images and associating with others with similar obsessive interests as well as those who might seek to harm them. With clear evidence of the link between adolescents' social media usage and eating disorders, there is a need to ensure recommender systems are not triggering young people to engage in harmful behaviours. Instead, internet and social media providers should be using their algorithms to deliver positive and supportive content to young users who are detected from their internet usage as

possibly being at risk. This positive and supportive messaging should be developed in consultation with the eating disorders sector.

EDFA supports internet and social media providers integrating user empowerment controls into the design and functionality of their services. This is an important tool for parents and carers as well as the young people who have, or are at risk of, eating disorders. These should include blocking and muting tools, content filtering through opt-out tools, and restrictive safety settings to protect children from harmful content. Users should be able to apply these tools to control access to a broad range of content, including but definitely not restricted to adult content. For example, content filtering tools and restrictive safety settings should be able to prevent access to sites that encourage extreme dieting and weight loss or glorify unhealthy body images and shapes. Internet and social media providers should ensure these user empowerment tools are as easy as possible to use and come with educational materials that are understandable for people who may not be regular users of their services.

The best interests of the child

EDFA supports the additional expectation that service providers will take reasonable steps to ensure the best interests of the child are a primary consideration in the design and operation of any service that is used by, or accessible to, children. We also support the expectation that service providers will implement age assurance mechanisms to restrict access by children to Class 2 materials and that they continue to enhance these solutions technologically over time.

Children and adolescents who have, or are at risk of, eating disorders are highly impressionable and susceptible to online harms. Like young online users more broadly, they access a wide range of online content, not all of which is specifically targeted at children. Much of this material is generally available but will not be caught by any age assurance requirements or technologies. It is therefore imperative that the best interests of the child is a primary consideration in the design and operation of all internet and social media services that are accessible by children. While social media platforms may have policies and self-registration processes to discourage access by younger children, these are not always effective, so service providers should be required to assume that their services are not age restricted and are being accessed by children. EDFA believes there is merit in considering a classification system similar to that which exists for other media, with a requirement to provide photo ID in order to access age-restricted content. The “best interests of the child” should apply to all generally accessible internet content, and this should be clearly stipulated in the BOSE.

The consultation paper states that service providers will be expected to consider the best interests of the child generally, including having regard to the physical, psychological, and emotional well-being of children on a service. More than 22% of adolescents are affected by eating disorders (Mitchison et al, 2020). As EDFA has consistently pointed out, the link between internet and social media usage, heightened body image concerns, and disordered eating is well established. Rogers and Melioli found as far back as 2016 in their empirical review of 67 separate studies:

“The existing data supports a relationship between Internet use and body image and eating concerns, and adolescents may be particularly vulnerable to the impact of the Internet. In

particular, engagement with visual, appearance-focused social media platforms is associated with heightened concerns.”²

This makes it essential that the “interests of the child” BOSE requires service providers to consider the potential of their service to adversely impact the “physical, psychological and emotional well-being” of children on their service who have, or are at risk of, eating disorders. This should occur at all stages of the development and operation of the service including its design, the use of algorithm-enabled recommender systems, working with lived experience eating disorder experts, responding to complaints, and taking on board feedback and research. It should involve a combination of measures, including:

- being transparent to users about the content on their service;
- not allowing and removing any content that could cause harm to children;
- having a culture of continuously improving online safety for children, including through the promotion of positive perceptions about body image;
- being transparent about their use of Generative AI and algorithm-enabled recommender systems; and
- including visible messaging about their commitment to the “interests of the child,” the practical actions they are taking to minimise online harm for children, a complaints and feedback mechanism, and educational material to enable users to opt out or restrict access to content that may not be appropriate for children.

² Rachel F Rodgers and Tiffany Melioli, Adolescent Research Review volume 1, pages 95–119 (2016)