Dear Ms. Fore:

We the undersigned 487 child safety experts and advocates from 26 countries are writing with serious concern about harmful inaccuracies regarding the impact of pornography to children in the April 2021 publication “Digital Age Assurance Tools and Children’s Rights Online across the Globe.”

This document provided many useful insights regarding the intersection of children’s rights, business and the Internet and commendably provides references to evidence and reports to substantiate statements and claims. However, the report as originally posted failed to provide any evidence to support its claim that “there is no consensus on the degree to which pornography is harmful to children.”1 Elsewhere the paper similarly asserts, “As discussed above, the evidence is inconsistent and there is currently no universal agreement on the nature and extent of the harm caused to children by viewing material classified as pornography.”2

We thank you that edits appear to have been made to this document to correct these claims. Though the edits still fall short of recognizing the vast body of research demonstrating the harms of pornography to children, and therefore lay a faulty foundation for future potential policies that could put children at psychological and social developmental risk due to pornography exposure.

Further, the UNICEF report raises concerns about children’s privacy rights as potential barriers to age verification laws, or other legislation to protect children from pornography. We request a clarification to be made that the right to privacy under the International Covenant on Civil and Political Rights, Article 17, and the Convention on the Rights of the Child, Article 16, does not protect children’s right to access pornography in private. It protects against “unlawful” interference and attacks. States have broad latitude under these human rights treaties to craft laws to protect children from harmful content.

We ask that you review the below sampling of available research, and that the UNICEF Child Rights and Business Unit accordingly conduct a thorough literature review and subsequent update of its report to recognize the existing research demonstrating negative impacts of pornography to children and the right of states to protect them from it.

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Overview
A literature review of 57 studies investigating pornography use among adolescents identified 21 studies which examined adolescents’ sexual attitudes and behaviors towards sex in relation to their pornography use. The review stated, “Specifically, longitudinal and cross-sectional studies using Chinese, United States, Taiwanese and Dutch samples showed that early exposure to pornography predicted more permissive sexual attitudes, sexual harassment perpetration, a range of sexual behaviors in females and sexual preoccupation and later sexual experimentation in males.”

Sexual Development
Pornography exposure at a young age introduces sexual behaviors to youth and may reinforce those behaviors as rewarding. Frequent pornography use may lead to greater sexual preoccupation among adolescents, such as greater self-reported interest in sex and pornography than peers, thinking about sex almost all the time, fantasizing about trying sexual activities seen in pornography several times a week, as well as having tried acts seen in pornography. A study of university students in the U.S. found that exposure to sexually explicit material (SEM) during childhood was a significant predictor of future SEM use, online sexual behaviors, and sexual dysfunctions in young adulthood. These findings suggest that children ages 6 to 12 may not have the psychological resiliency to handle disruptive overexposure to SEM.

Further, “Mainstream online pornography is a key social institution” for developing norms of sexual conduct. According to the top three pornography websites in the UK, those social norms include sexual violence from the very outset of the user experience—no click required. Recent research has shown that 1 in 8 (12%) of the video titles on largest mainstream pornography sites in the U.K. (Pornhub, XVideos, and XHamster) described activities that constitute sexual violence including sexual activity between family members, aggression and assault, image-based sexual abuse, and coercive and exploitive sexual activity. Much of the material analyzed likely depicted evidence of real sexual assaults and non-consensual distribution of sexually explicit material. Thus, children who end up these sites are being socialized to sexually violent pornography from the very outset of their exposure to hardcore pornography.

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7 Ibid.
Sexual Violence

Pornography normalizes sexual violence. Current exposure to violent pornography among adolescents can predict emergence of sexual violence, with average age at first perpetration between 15 and 16 years.\(^8\) Several studies have shown pornography consumption to be associated with both verbal and physical sexual aggression\(^9\) and actual and anticipated dating/sexual violence among adolescents.\(^10\) For instance, a study found that among adolescents exposed to violent pornography, boys were 2 to 3 times more likely to report sexual dating violence, both perpetration and victimization, while girls were over 1.5 times more likely to perpetrate threatening and physical dating violence.\(^11\)

A longitudinal study of youth ages 10-15 years found that those who reported intentional exposure to violent X-rated material over time were nearly six times more likely than those who did not consume X-rated material to self-report sexually aggressive behavior. This association remained significant even after controlling for other factors that may contribute to sexually aggressive behavior (e.g., sexual aggression victimization, alcohol and drug use, witnessing family violence, and general aggressive behavior). The study hypothesized that “viewing pornography that portrays sexual aggression as rewarding may reinforce an individual’s own proclivity toward sexually aggressive behavior.”\(^12\)

A meta-analysis of 59 different studies (from 1975 to 2008) comparing adolescent (12–18 years old) male sex offenders (n=3,855) to male non-sex offenders (n=13,393) found that adolescents who had sexually offended were significantly more likely to have had early exposure to pornography, report higher rates of exposure to pornography, have significantly more atypical sexual fantasies, behaviors or interests (sex with animals, incest, pedophilia, etc.), and were more often diagnosed with a paraphilia than non-sex offenders. The researchers suggested that promising directions for further research included the roles of exposure to sexual violence, exposure to sex or pornography more generally, and atypical sexual interests.\(^13\)

Brain Development

Among adults, increased pornography use has been linked to decreased brain gray matter volume in the areas of the brain associated with motivation and decision-making.\(^14\) Current literature suggests the adolescent brain may be more sensitive to pornography than the mature adult brain because of the

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overlap between key areas associated with the brain’s response to sexually explicit material and the vulnerabilities posed by adolescent brain’s immaturity in those same regions.\(^\text{15}\)

**Compulsive Sexual Behavior**

The delayed development of the brain region associated with decision-making and impulsivity, may increase adolescents’ risk of developing problematic pornography use if exposed to it.\(^\text{16}\) Among males, younger age of first exposure to pornography has been linked to higher rates of current pornography use.\(^\text{17}\) Another study found that 27% of adolescents who frequently used pornography reported watching more pornography than they wanted.\(^\text{18}\)

**Learning**

Adolescent pornography use displaces time that needs to be spent on schoolwork or studying and disrupts attention and engagement in non-sexual endeavors.\(^\text{19}\) Additionally, Internet pornography may negatively impact academic performance. Research has shown that the more adolescent boys viewed pornography, the poorer their grades were after six months.\(^\text{20}\) Additionally, a study which compared adolescents with pornography addiction to those without found that those with pornography addiction suffered a 13.36% reduction in their verbal memory.\(^\text{21}\)

**Attitudes Toward Self/Mental Health**

High consumption of pornography is linked with poor self-image and increased insecurity.\(^\text{22}\) Studies have found adolescent pornography use to be associated with lower life satisfaction, psychosomatic symptoms, depressive symptoms,\(^\text{23}\) suicidal ideation and suicide attempts.\(^\text{24}\)


\(^{18}\) Donevan and Mattebo, ibid.


\(^{20}\) Ibid.


\(^{22}\) Owens et al., ibid.


general, has also been associated with severe levels of depression, anxiety, and stress among university students.25

Perceptions of Sex and Others
Pornography teaches inaccuracies about sex to young viewers. Research has shown that exposure to pornography helps to sustain young people’s adherence to sexist, unhealthy perceptions of sex and relationships.26 Studies have found that adolescents exposed to pornography have stronger gender-stereotypical sexual beliefs, more permissive sexual attitudes,27 and greater acceptance of sexist beliefs, rape myths,28 and dating/sexual violence.29

Relationships
A study of Israeli adolescents found that high attachment anxiety and loneliness were predictors of pornography use and online sexual activities. These results indicate that adolescents experiencing loneliness and fear of rejection may use pornography as compensation for the lack of affection and love which they crave.30

Risky Sexual Behavior
Pornography use among adolescents is associated with risky sexual behaviors like greater occurrence of sexual intercourse, experience with casual sex behavior,31 unprotected sex, sex under the influence of alcohol,32 anal sex,33 oral sex, and trying sexual acts seen in pornography.34 Exposure to pornography early in adolescence can predict early sexual debut, unsafe sex, and multiple sexual partners in later adolescence.35

Other Risky Behavior

29 Rodenhizer and Edwards, ibid.
31 Peter and Valkenburg, ibid.
32 Cho, ibid.
34 Donevan and Mattebo, ibid.
A study of Korean adolescents found that frequent pornography use was associated with harmful behavior like alcohol use, smoking, and drug use.\textsuperscript{36} For emerging adult men, pornography use has been associated with greater alcohol use and binge drinking.\textsuperscript{37}

**Sending Sexually Explicit Images**
A survey of 4,564 adolescents aged 14–17 in five European countries found that viewing Internet pornography is significantly associated with an increased probability of having sent sexual images and messages (sexting) among boys.\textsuperscript{38} A separate survey of 617 college freshman found that 30% of participants sent nude pictures at some time during high school; 45% had received nude pictures on their cell phones. The most important motivation for sexting was coercion such as blackmail or threats (about half of all sexting may be coercive).\textsuperscript{39} Importantly, it is impossible to control where sexted images end up once sent.\textsuperscript{40} A study by the Internet Watch Foundation found that 88% of self-produced sexual images and videos of youth appeared on parasite websites, indicating that control over self-generated sexts is lost once the content has been circulated online.\textsuperscript{41}

**Increased Likelihood of Selling and Buying Sex**
Male high schools seniors who were frequent users of pornography were significantly more likely to have sold (7.0% vs. 1.2%) and bought sex (7.7% vs. 1.5%) than other males of the same age.\textsuperscript{42}

**Increased Female Sexual Victimization**
A study of 14- to 19-year-olds found that females who watched pornographic videos were at significantly greater likelihood of being victims of sexual harassment or sexual assault.\textsuperscript{43}

Signed,

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- Martin Myszka
- Tim Ross
- Elle Tino
- Glynis Blake

**United States, Cont.**
- Austin Ruse
- Shonda Hall
- Eleanor Kaufman
- Lael Johnson

\textsuperscript{36} Cho, ibid.
\textsuperscript{40} Reynolds et al., ibid.
\textsuperscript{41} Smith, ibid. Note: parasite websites are websites created for the purpose of displaying self-generated content harvested from the website to which it was originally uploaded.
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