

**RE: THE URGENT NEED FOR ACTION ON PROTECTING CHILDREN ONLINE INCLUDING FROM EXPOSURE TO AGE-INAPPROPRIATE CONTENT and NCWC SUPPORT FOR S209**

April 7<sup>th</sup>, 2026

Dear Minister Miller and Minister Solomon,

**The National Council of Women of Canada (NCWC) urges swift approval of Bill S-209, *An Act to restrict young persons' online access to pornographic material*, citing strong evidence for protective age-verification measures.**

**Our Historical Commitment**

The National Council of Women of Canada has long been committed to protecting children's wellbeing and rights. Several years ago, recognizing the critical threat posed by unregulated access to online pornography, the NCWC circulated an Open Letter in support of Bill S210 and age-verification legislation. Now closed, the letter, updated to S209 can be viewed here: <https://www.ncwcanada.ca/letter-of-support>. (The list of organizations who signed follows.)

**Widespread Support for Bill S-209-** The evidence supporting this legislation is compelling and multifaceted.

**1. Canadian Public Opinion-** Polling data demonstrates overwhelming public support for age-verification measures:

- A Léger poll of 1,614 Canadian respondents conducted February 2 to 5, 2024, found that 77% of Canadians support age verification to access online pornography, with only 13% in opposition.
- A Nanos Research poll for *The Globe and Mail* found that 79% of Canadians support forcing online platforms to verify users are 18 before accessing pornography.
- Support is particularly strong among women, with 89% approval, compared to 70% among men.
- Support is highest in Quebec, where 82% of residents endorse age-verification measures.

**2. Well-Documented Harms to Children-**The psychosocial impacts of pornography exposure on children are grave and extensively documented:

- Research by the UK Children's Commissioner identified an association between exposure to pornography before age 12 and negative health outcomes, including lower self-esteem.
- A review of 19 studies in New Zealand found that adolescents who view online pornography are more likely to engage in risky sexual behaviours and to experience anxiety or depression.
- A UK study by the British Board of Film Classification revealed that 60% of children's first exposure to pornography is unintentional, with average first exposure occurring between ages 9 and 11.

- The 2023 Children First Canada report documents alarming increases in harm to Canadian youth: sexual internet luring has increased 815% over five years, with 51% of affected children experiencing depression and 39% experiencing anxiety.

**3. International Precedent**-Canada is falling behind peer nations in protecting children. Age-verification legislation or similar protective measures have been adopted or are being implemented in:

- The United Kingdom, where the Online Safety Act mandates age verification for much of the web.
- France, where “no porn, no Instagram for kids” policies include age-verification requirements.
- The United States, where a growing number of states require age verification for pornography sites.
- New Zealand, where public support for age-verification policies is also high.

**4. Alignment with International Commitments**-Bill S-209 directly supports Canada’s existing international obligations:

- Canada ratified the UN Convention on the Rights of the Child in 1991, and Article 19 requires all appropriate legislative measures to protect children from exploitation and abuse.
- UN General Comment 25, adopted in February 2021, explicitly calls for robust age-verification systems to prevent children from accessing services that are illegal for their age, while maintaining data protection and privacy safeguards.
- General Comment 25, paragraph 114, states that parties should legislate to ensure that children are protected from harmful goods and services, and that robust age-verification systems should be used to prevent access to products and services illegal for children to own or use, consistent with data protection and safeguarding requirements.

### **The Urgency of Action and Call to Action**

Without regulation, there are no enforceable protections mirroring what Canadians expect in the physical world. Parents are not expected to patrol bars, casinos, or strip clubs to protect their children — nor should they bear sole responsibility for ensuring safe online experiences. Governments worldwide have recognized this duty and are requiring platforms to implement safeguards that reflect society's standards.

Canada is already falling behind on child and youth wellbeing. [UNICEF’s Report Card 19](#) ranks Canada 19th out of 36 wealthy countries overall, with troubling results in mental health, physical health, and life satisfaction and that progress has stalled even as the country’s wealth has grown.

This legislation must advance without delay. While digital technology offers opportunities, the well-documented risks to children make inaction indefensible. Inaction is not neutrality; it is a deliberate choice to leave children unprotected in proven harmful environments.

The situation facing Canadian children is therefore both urgent and preventable. An estimated 2.7 million Canadian children under age 11 are active on the internet, making hundreds of thousands of vulnerable youngsters susceptible to unintended pornography exposure. Current law blocks in-person porn sales to minors, but offers zero online protection. Proven age-verification technologies now enable effective safeguards without compromising privacy.

For these reasons, we ask your government to prioritize children’s wellbeing by advancing meaningful age-verification legislation and ensuring that online protections keep pace with the standards we already accept offline. Failing to do so would be to ignore due diligence and to fall short of our obligations to every child in Canada.

The National Council of Women of Canada therefore urges both your departments to:

1. Actively support the passage of Bill S-209 in Parliament.
2. Prioritize its consideration in legislative scheduling.
3. Collaborate with other government departments to ensure effective implementation, particularly regarding privacy-protective technology standards.
4. Communicate to your parliamentary colleagues the compelling evidence and public mandate supporting this critical child protection measure.

**Conclusion**

The National Council of Women of Canada believes that Bill S-209 represents a measured, proportionate response to a serious public health threat to Canadian children. The convergence of scientific evidence, public opinion, international best practice, and our existing international obligations makes the case for swift passage of this legislation both urgent and compelling.

Recognising that protecting children goes beyond individual government departments and is a collective duty across all levels of government and political parties, we welcome the opportunity to meet with you to discuss this matter further to provide additional research, stakeholder perspectives, and international comparisons and look forward to your response.

**Respectfully submitted,**

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cc.  
The Right Honourable Mark Carney  
The Honourable Sean Fraser Minister of Justice and Attorney General of Canada  
The Honourable Gary Anandasangaree Minister of Public Safety  
The Honourable Patty Hajdu Minister of Jobs and Families  
The Honourable Rechie Valdez Minister of Women and Gender Equality  
The Honourable Anna Gainey Secretary of State for Children and Youth

*Mission Statement:*

*To empower all women to work together towards improving the quality of life for women, families, and society through a forum of member organizations and individuals.*

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## **OPEN LETTER SIGNATORIES S210/S209:**

(Alphabetically listed)

### **NATIONAL ORGANIZATIONS:**

Anglican Church of Canada  
Arrêter ExploitationHub  
Bridge2Future  
Buyer Resist Education Society  
Canadians4Action Coalition/Canadians for the Protection of Children Online  
CFUW-Canadian Federation of University Women  
Connecting to Protect  
Courage For Freedom  
Defend Dignity  
EFC: Centre for Faith and Public Life  
EPPNE Ensemble pour Protéger Nos Enfants  
EVE (Exploited Voices now Educating)  
Exploitation Education Institute  
Family Federation for World Peace  
Marie-Vincent Foundation  
Parents Aware  
PWRDF Primate & World Relief and Development Fund/Alongside Hope  
Religions for Peace Canada  
Services 4 Humanity  
Symphonie Communications  
The Canadian Coalition to Empower Women  
The Canadian Federation of Business and Professional Women  
The National Council of Women of Canada  
Women's Federation for World Peace, Canada

### **REGIONAL COMMUNITY and SERVICE ORGANIZATIONS**

Archdiocese of Vancouver  
Association des Parents Catholiques du Québec  
BPW Montreal  
Brome Missisquoi Youth Foundation and Houses of Hope  
Business & Professional Women of Niagara  
Conseil des Femmes de Quebec (PCWQ)  
Diocèse de Valleyfield  
Elementary Teachers Federation of Ontario (ETFO)  
Family Enrichment and Counselling Service  
Fredericton Inc.

Institut de Formation et d'Aide  
Communautaire à l'Enfant et à la famille (IFACEF)  
Kristen French Child Advocacy Centre  
La Sortie  
Logifem-Montreal  
Montreal Council of Women  
Montreal Diocesan Theological College  
Niagara District Council of Women  
Ontario Secondary School Teachers' Federation  
Ontario Federation of Home and School Association Inc  
PEI Retired Teachers' Organization  
Provincial Council of Women of British Columbia  
Provincial Council of Women of Manitoba  
Religions pour la Paix - Québec  
StCF Services Inc (Setting the Captives Free Services)  
TOES Niagara (Tools of Empowerment for Success)  
Toronto and Area Council of Women  
Vancouver Anti-Porn Society  
Women Aware-Montreal

### **LOCAL COMMUNITY and SERVICE ORGANIZATIONS**

Christ Church Cathedral-Montreal  
Christ Lutheran Church-Rhein, Saskatchewan  
Church of St Mark & St Peter- Montreal  
Conseil Canadien des Femmes Musulmanes-Montréal  
Grace Church- Sutton Quebec  
Le Carrefour de l'Espoir St-Michel  
Montreal Lakeshore University Women's Club  
Ottawa Council of Women  
Ottawa Council on Aging  
Phoenix Community Projects -Montreal  
Prince Albert Council of Women  
Saskatoon Council of Women  
Setting the Captives Free Services-Vancouver  
Sorooptimist International of Chilliwack  
Sorooptimist International of Vancouver

Soroptimist International of Victoria  
Westshore (SIVW)  
St Matthew & Mar Thoma Church -Toronto  
St. Augustine Church -Vancouver  
St. Matthias; Anglican Church -Westmount  
Quebec  
Ukrainian Women's Association of Canada-  
Vancouver  
Ukrainian Women's Association of Canada-  
Kniahynia Olha Branch  
Vancouver Anti-Porn Society  
Vancouver Collective Against Sexual  
Exploitation (VCASE)  
Vancouver Council of Women  
Welcome Hall Mission-Montreal  
Winnipeg Council of Women  
YWCA Metro Vancouver  
Zonta Club of Montreal