May 21, 2025

Mr. Sundar Pichai Chief Executive Officer Google, Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043

Re: Suspending Gemini Rollout Due to the AI Chatbot's Unaddressed, Significant Risks to Young Children

Dear Mr. Pichai,

Once again, it appears that Google is exposing children to significant online safety and privacy risks in its race to promote its latest product. This month, Google <u>announced</u> it would roll out a version of its Gemini chatbot for users under 13 years old. Google should reverse that decision. AI chatbots cause a litany of well-documented harms, from stunting social development to endangering online safety and privacy. These harms are particularly acute for young children. Google's announcement flies in the face of privacy and online safety laws including the Children's Online Privacy Protection Act¹ and other state design code statutes. As a coalition of consumer advocates and children's online privacy and safety experts, we write to ask Google to halt its rollout of the Gemini chatbot to children under 13.

AI chatbots and <u>other generative AI products</u> pose heightened risks to young children. Children have <u>difficulty understanding the difference</u> between an AI chatbot and a human, and AI chatbots can <u>easily trick a child into trusting it.</u>² AI systems, like Gemini, expose young children especially vulnerable to misinformation and manipulation. There are similar, <u>serious risks</u> to children's mental health and social development,³ as young users may develop a psychological dependence or rely on AI chatbots for untrustworthy information, parasocial companionship, or emotional support. Finally, although Google claims that children's data <u>would not be used</u> to train its AI, serious data protection and user privacy concerns persist. For example, Google has not identified additional safeguards to ensure that it would not misuse data collected through Gemini for other internal purposes or share it with third parties.

¹ 16 C.F.R. § 312.4 (Offering Gemini to children likely constitutes a "material change in the collection, use, or disclosure practices to which the parent has consented," under §312.4 of the COPPA Rule, requiring Google to comply with additional notice and consent requirements under the law.).

² Young children, beginning around age 3 through <u>elementary school</u>, <u>are incredibly credulous</u>, <u>or highly trusting</u>, especially when it comes to things they hear from others (called "interpersonal trust"). Though Google's <u>Family</u> <u>Guide to AI</u> warns that, "AI can make mistakes; put on your thinking cap!... You should always double-check if what AI tells you is right." This is a developmentally inappropriate demand on young kids with potentially harmful consequences.

³ When researchers looked at how children 3-10 years old interact with internet-connected toys like AI chat bots, <u>they found that they were likely to treat them like a person</u>. <u>Another study</u> "observed that... young children...attributed human-like qualities to the devices and developed an emotional attachment to them." This emotional attachment can disturb or, in extreme cases, displace essential real-life interactions, and can be detrimental to children's healthy social-emotional development.

Gemini system itself echoes these concerns. When asked if it posed risks to children's privacy and safety, it identified many of the above-listed harms. However, the Google announcement disclaimed any responsibility to mitigate these harms or implement safeguards around its own product. Instead, Google unfairly shifts all responsibility onto parents, <u>recommending</u> that parents teach their children how to fact-check Gemini's answers, remind their children that Gemini isn't human, and instruct their children not to disclose sensitive personal information to the AI chatbot. While parental involvement is a key component of children's online safety, the companies creating and financially benefitting from these highly complex systems are the ones who best understand their products and are in the best position to take meaningful action on safety, fitness, and compliance with legal obligations. If Google wants to market its products to children, it is Google's responsibility to ensure that the product is safe and developmentally appropriate for those children, which it has not done.

Given the substantial harm that AI chatbots like Gemini pose to children, and the absence of evidence that these products are safe for children, Google must suspend its rollout of Gemini for young children under 13.

Sincerely,

Organizations:

Electronic Privacy Information Center (EPIC) Fairplay

Africa Digital Rights Hub LBG AFT Alana Institute Alexander Neville Foundation Alternative Solutions ANEW Life International, Inc Anxiety and Depression Association of America Becca Schmill Foundation Better Screen Time **Better Tech Project** Center for Digital Democracy Center for Online Safety Centre for Media, Technology, and Democracy Check My Ads Child Online Africa (COA) Clinical Social Work Association **Consumer** Action Consumer Federation of California Corporación Colombiana de Padres y Madres - Red PaPaz David's Legacy Foundation Defending the Early years Depression and Bipolar Support Alliance (DBSA)

Design It For Us **Devin J Norring Foundation** Early Childhood Work Group, Fairplay's Screen Time Action Network Eating Disorder Coalition of Iowa Eating Disorders Coalition for Research, Policy, & Action **EDGE** Consulting Partners Educate and Empower Kids Enough Is Enough Erik's Cause **Farrington Specialty Centers Global Action Plan** Grace McComas Memorial Internet Safety Labs IPA-Canada Jewish Family and Children's Services (SF Bay Area) LiveMore ScreenLess Lookup.live Lynn's Warriors Maternal Mental Health Leadership Alliance Matthew E. Minor Awareness Foundation Media Monitoring Africa Mental Health Association of South Mississippi National Federation of Families Parents Television and Media Council Parents Who Fight **ParentsSOS** ParentsTogether Action Paving the Way Foundation Peace Educators Allied for Children Everywhere (PEACE) Protect Young Eyes Raising Awareness About Digital Dangers (raadd.) **Realized Potential Inc REDC** Consortium SAVE-Suicide Awareness Voices of Education Strategic Training Initiative for the Prevention of Eating Disorders Tech Transparency Project The Anxious Generation Campaign The Multi Service Eating Disorders Association Inc The Tech Oversight Project Truce Turning Life On U.S. Public Interest Research Group (PIRG) UltraViolet United Church of Christ Media Justice Ministry VSAK Washington Nature Preschool Association (WaNPA)

WealthManagementMinistries-Prevention Works Joint Task Force and Coalition Wired Human WithAll Yellowstone Human Trafficking Task Force

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