# PLATFORMS' POLICIES ON CLIMATE CHANGE MISINFORMATION

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## WHY THIS UPDATE MATTERS

This document is a revised and updated version of the technical document Platforms' policies on climate change misinformation first published in 2023. Back then, we mapped how five major platforms, Facebook, Instagram, YouTube, TikTok, and X/Twitter, addressed climate change disinformation through their policies and enforcement systems.

At that time, the Digital Services Act (DSA) had not yet entered into force. Therefore, platforms had no legal obligation to address climate disinformation in the EU, and each one did so in its own way, with varying levels of ambition and effectiveness.

The DSA is now in force, but climate disinformation is not explicitly recognised as a "systemic risk" under Articles 34–35. This omission limits its inclusion in platform risk assessments, mitigation efforts, and transparency reports, and leaves enforcement largely discretionary. Without specific guidance or mandates, platforms retain wide latitude in deciding whether and how to address climate harms.

With this regulatory gap in mind, we set out to examine how platform responses to climate disinformation evolved or failed to evolve between 2023 and 2025, and what their policies look like in practice across **Facebook, Instagram, YouTube, TikTok, X,** and, newly included in this edition, **LinkedIn**. This update aims therefore to:



**Refresh memory** by documenting what actions were in place in 2023.



**Measure progress or regression**, both in public commitments and enforcement practices.



**Support renewed pressure on platforms** to address climate disinformation more seriously.



**Encourage EU regulators to explicitly recognise climate disinformation as a systemic risk under the DSA**, and ensure future guidance, risk mitigation requirements, and platform transparency reflect that urgency.

As the climate crisis accelerates, it is crucial to demand that very large online platforms (VLOPs)<sup>1</sup> take meaningful, measurable action to reduce the spread and amplification of harmful climate narratives, whether through misleading organic content, monetised falsehoods, algorithmic echo chambers, or paid advertisements.

### **METHODOLOGY**

This assessment is based exclusively on a review of publicly available policy documentation provided by six major platforms (Facebook, Instagram, YouTube, TikTok, X, and LinkedIn). The focus was limited to sections of their official websites or transparency hubs that address content moderation, misinformation, and advertising policies. No independent monitoring of disinformation content was conducted for this report. Analysis of EU policy and regulatory context reflects internal expertise and the institutional position of the EU DisinfoLab on the treatment of climate disinformation under the Digital Services Act (DSA).

## **EXECUTIVE SUMMARY**

As the climate crisis deepens, online platforms continue to play a central, yet inadequately governed role in shaping public understanding of climate change. This updated analysis of platform policies from 2023 to 2025 reveals a **landscape of partial progress, regulatory evasion, and growing systemic risks**.

Despite new obligations under the Digital Services Act (DSA), **climate disinformation remains largely unregulated**, falling through the cracks of enforcement and transparency regimes. **Platforms** are not legally required to recognise climate disinformation as a systemic risk, and **most continue to treat it as a marginal issue, if they address it at all**.

**Our findings confirm that:** 

**TikTok** is the only platform with a dedicated, climatespecific content moderation policy, while others (Facebook, Instagram, YouTube, X, LinkedIn) either apply general misinformation rules or provide no relevant framework.



YouTube has formally rejected onboarding third-party fact-checkers under the DSA, weakening accountability and setting a troubling precedent.





Meta's Climate Science Center and Climate Info Finder, previously referenced in its transparency and help resources, are no longer included in public-facing documentation as of 2025. This absence may indicate deprioritisation of climate-focused user resources.



No platform addresses Al-generated climate disinformation through specific moderation tools or disclosure mechanisms, despite the accelerating use of synthetic media in climate denial and greenwashing campaigns.

Recommender systems remain unexamined vectors for the amplification of climate disinformation. None of the assessed platforms include climate risks in their systemic risk audits under Article 34(1)(c) of the DSA.



While a few partial measures persist, such as TikTok's definition of climate denial, periodic search interventions, and ad demonetisation policies on TikTok and YouTube, these remain narrow in scope, inconsistently enforced, and rarely apply to unpaid organic content.

Other platforms that previously referenced climate disinformation (such as Meta) now do so only under generic misinformation categories, and have not reaffirmed or updated climate-specific enforcement frameworks in 2025.

Crucially, no platform offers climate-specific appeal pathways, takedown transparency, or defined enforcement thresholds, leaving users without clarity, remedy, or redress.

In response, this report proposes a dual framework of policy and platform action, calling on EU institutions to formally designate climate disinformation as a systemic risk and requiring platforms to adopt transparent, climate-specific moderation systems. Without these measures, the EU's digital governance goals, and its climate transition targets, remain undermined by unchecked falsehoods and opaque amplification systems.

## **CLIMATE DISINFORMATION POLICY ANALYSIS**

The following three-part classification distils platform actions into what's functioning, what remains ambiguous or limited, and what is clearly absent. These categories help distinguish between symbolic gestures and meaningful implementation, based on whether measures are Climate-specific; Actively enforced; Publicly documented.

Each finding is coded as:



What's working (partially)



What's unclear or weak



What's missing or concerning

This typology allows readers to track not only the presence of climate policies, but their credibility, implementation gaps, and regulatory alignment.

## What's working (partially)



- TikTok maintains a clear policy that prohibits content disavowing the established scientific consensus on climate change. This definition is consistent from 2023 to 2025 and is unique among platforms.
- TikTok continues to apply both automated and human moderation, and explicitly states that climate content is within scope. While transparency on Al use is limited, its moderation policy includes more climate-specific language than other platforms.
- TikTok and YouTube prohibit monetisation of content that denies or contradicts climate science. These restrictions remain in force in 2025 and are verifiable in platform ad policy documents.
- TikTok implements search interventions and banners linking to authoritative sources.
   While these features remain active, the frequency and scope of deployment are not publicly detailed.

#### What's unclear or weak



- TikTok's policies confirm the use of search interventions and banners linking to authoritative climate sources, but do not specify the frequency, scope, or deployment triggers for these features.
- YouTube's climate information panels remain legacy tools with inconsistent visibility, especially in non-English content. No EU-specific updates or improvements are evident in 2025.
- Strike systems on Meta, TikTok, and YouTube are embedded in general Community Guidelines. There is no clarity on whether climate misinformation triggers penalties or or is explicitly in scope for enforcement, and no platform publishes strike thresholds related to climate harms.
- Downranking and labelling mechanisms on Meta and YouTube depend on third-party fact-checkers. They lack proactive or climate-specific triggers, and there is no visibility threshold for reducing harmful content, a model unchanged since 2023.
- Community Notes on X/Twitter rely on crowdsourced input with no scientific vetting. Climate disinfo is not a structured content category, and environmental expertise is absent from contributor training and policy documentation.
- No platform offers a climate-specific appeal or redress process, despite DSA Articles 20 and 34 mandating general appeal mechanisms. Appeal mechanisms do not specify whether environmental or scientific content qualifies for redress.<sup>2</sup>
- TikTok claims to use Al in moderation but does not disclose whether synthetic or manipulated climate narratives are covering a critical gap given Al's increasing role in generating disinformation.

- Meta's climate moderation policies have not been updated since 2022. No new public evidence of model training, refinement, or enforcement updates has emerged.
- Recommender systems key engines of content visibility are not assessed for their role in amplifying climate disinformation. No platform includes climate in algorithmic risk audits despite DSA Article 34(1)(c) obligations.
- Across platforms, transparency on the implementation of moderation and information tools remains limited. While most companies claim to use both automated systems and human reviewers to enforce content guidelines, none publicly detail how these systems are trained or adapted to detect climate-specific or Al-generated disinformation. Similarly, informational prompts and banners, often cited as mitigation tools, are deployed without disclosure of scope, frequency, language coverage, or trigger criteria. This lack of clarity hinders public oversight and makes it difficult to assess the real-world impact of these interventions.

<sup>2</sup> While the DSA mandates general appeal mechanisms (Art. 20), platforms are not currently required to offer climate-specific processes, as climate disinformation is not yet classified as a systemic risk under Articles 34–35

#### What's missing or concerning



- YouTube has explicitly declined to integrate third-party fact-checkers under the DSA. In its January 2025 announcement, the platform confirmed it would not incorporate independent EU fact-checkers into its content moderation workflow. This refusal represents a formal rollback of transparency and weakens compliance with systemic risk provisions.
- YouTube does not moderate organic climate disinformation. While its ad policies
  prohibit monetisation of denialist content, it lacks removal policies, user-facing
  labels, visibility thresholds, or content-level accountability for unpaid posts leaving a
  major volume of disinformation unchecked.
- Meta's Climate Science Center and Info Finder were removed between 2023 and 2025 without explanation or replacement. These tools previously supported public-facing climate education and signalled institutional commitment.
- LinkedIn remains completely absent from the climate disinformation landscape. It provides no moderation policies, user tools, transparency updates, or even policy-level recognition of climate mis/disinformation as a risk category.
- TikTok's moderation system lacks disclosure on synthetic or Al-generated climate disinformation. Despite claims that Al is used to flag harmful content, there is no evidence these tools address climate-related narratives, a growing and high-risk vector of harm.
- Meta's third-party fact-checking system applies only to content explicitly rated under generic categories like "False" or "Missing Context." There is no evidence climate-specific enforcement exists, and Meta has signalled potential phase-out of this program in the EU depending on DSA implementation.
- No major VLOP offers a climate-specific appeal mechanism. While appeal routes technically exist under Articles 20 and 34 of the DSA, users cannot challenge

moderation decisions based on environmental or scientific claims, undermining access to redress for climate-related harms.

- No platform offers climate-specific enforcement categories, thresholds, or takedown triggers. Even TikTok, despite its standalone policy on climate denial, does not define differentiated enforcement tools or metrics. Climate content is lumped into generic misinformation enforcement.
- Recommender systems central to algorithmic amplification of climate denial remain unaudited. No platform publishes assessments, controls, or mitigation strategies addressing how their ranking systems might escalate or suppress climate disinformation. This failure persists despite DSA Article 34(1)(c), which mandates audits for systemic risks.
- No platform has conducted or published climate-specific systemic risk audits. While risk audits are required for election, health, and other harms under the DSA, platforms do not treat climate as a comparable risk category avoiding full transparency or governance action.
- X/Twitter has no formal climate misinformation policy. The platform lacks definitions, enforcement guidelines, fact-checking partnerships, or ad controls specific to climate. Its Community Notes tool also excludes environmental expertise and lacks pathways for systematic review of climate content.
- Al-generated climate disinformation remains completely unaddressed as a distinct harm. No platform defines this category, audits its risks, or applies moderation tools explicitly to synthetic climate narratives. While Meta introduced watermarking/ provenance metadata for Al content in 2024, there is no evidence this applies to climate enforcement.

## SYSTEMIC-LEVEL ANALYSIS / CROSS-CUTTING PROBLEMS



#### **Transparency failures persist across platforms.**

No Very Large Online Platform (VLOP) regularly publishes climate-specific transparency data. Key metrics such as prevalence of climate misinformation, enforcement volumes, or changes to policies remain undisclosed. This lack of visibility hinders external oversight and evaluation of progress over time.



#### Climate policies are scattered and opaque.

The architecture of climate-related policies particularly across Meta's ecosystem (e.g., Meta.com, Oversight Board decisions, Transparency Center) is fragmented and poorly documented. It is often unclear which measures are current, discontinued, or regionally applied, reducing user and researcher access to verifiable information.



#### Advertising rules do not account for climate disinformation.

Most platforms have general advertising guidelines but lack dedicated rules addressing misleading climate claims. This creates openings for fossil fuel interests and greenwashing campaigns to continue unchecked, including through sponsored content and influencer partnerships.



#### Climate disinformation is not recognised as a systemic risk.

Despite growing evidence of climate-related harms, the Digital Services Act (DSA) does not explicitly designate climate disinformation as a systemic risk. This omission enables platforms to sideline climate under broader misinformation policies avoiding disaggregated audits, risk mitigation duties, or mandatory reporting obligations.



#### **Enforcement tools lag evolving threats.**

Al-generated climate disinformation, amplified by recommender systems, is expanding in reach and sophistication. Yet no platform has formally defined synthetic climate narratives as a distinct harm or integrated them into detection, downranking, or labelling systems. This gap leaves an entire class of disinformation unaddressed.



## **BRIDGING POLICY AND ENFORCEMENT GAPS**

Despite the proliferation of climate disinformation across platforms, enforcement remains patchy and inconsistent. This is due in part to regulatory ambiguity: under the current EU framework, climate disinformation is not formally recognised as a "systemic risk" under the Digital Services Act (DSA). As a result, structured risk assessments, platform accountability, and tailored mitigation efforts remain optional rather than required.

To close this enforcement gap and future-proof digital governance in the face of escalating environmental and information crises, we propose a dual framework for action:

## **Regulatory recommendations**

**EU Institutions & National Authorities** 



- Formally recognise climate disinformation as a systemic risk under DSA Articles 34– 35, enabling structured risk assessments, mitigation protocols, and mandatory audits across platforms.
- Include climate disinformation in recommender system risk assessments as outlined in Article 34(1)(c), to account for algorithmic amplification of false or misleading climate narratives.
- Mandate disaggregated transparency reporting under Article 40, requiring platforms to publish enforcement metrics related to climate disinformation (e.g., takedowns, appeals, monetisation), broken down by content type, language, and EU region.
- Regulate misleading climate-related advertising, especially from high-polluting sectors
  or fossil fuel actors, through targeted ad policy updates and clearer implementation of
  green claims guidelines.
- Establish an EU Observatory on Climate Disinformation, tasked with monitoring trends, coordinating evidence-based countermeasures, and evaluating platform compliance and policy evolution over time.



#### Platform recommendations

Very Large Online Platforms / VLOPs

- Define and enforce climate-specific disinformation policies, including explicit coverage of Al-generated, synthetic, or manipulated climate narratives.
- Expand and diversify fact-checking partnerships, ensuring reliable coverage in all
  official EU languages and geographic markets, with the capacity to verify emerging
  climate disinfo tropes.
- Publish climate-specific enforcement data, including prevalence rates, takedown volumes, label usage, and monetisation trends for false or misleading climate content.
- Implement proactive downranking and demonetisation of harmful climate content, particularly content that contradicts the established scientific consensus or promotes greenwashing.
- Restrict fossil fuel and high-emissions industry advertising, especially when such ads include misleading sustainability claims, undermine public climate literacy, or conflict with EU green transition goals.

## PLATFORM-BY-PLATFORM POLICY OVERVIEW

The following tables summarise platform actions across three key dimensions: Definitions and actors, Types of actions, and Types of content. They reflect the evolution or stagnation of efforts between 2023 and 2025 across six major platforms: Facebook, Instagram, You-Tube, TikTok, X/Twitter, and LinkedIn.

To aid interpretation, a symbol-based scoring system is used:



Clear, verifiable climate-specific commitment or action exists



Partially met or unclear implementation
—> action exists but is generic, outdated, or inconsistently applied



Absent, discontinued, or no available evidence of relevant action



## **Definitions and actors**

Platform	Definition of climate change misinformation	Rationale for removing climate change misinformation	User resources on climate provided by platform	Internal actors	External collaborators
Facebook	Climate content determined as false by an authoritative third party and subject-matter experts.  2025 No updated or reaffirmed definition Fact-checkers may rate climate-related posts using standard criteria (e.g., "False", "Missing Context").	Help educate and inform people about the realities of climate change.  2025 Removed. No current official rationale mentioned publicly.	Climate Science Center prominently featured; Climate Info Finder tool available  2025: Climate Science Center is not accessible Climate Info Finder no longer highlighted	Automated tools and human content moderators: Keyword detection;  2025  Automated tools and human moderators still in use. No evidence that Meta's Al systems are designed to detect or flag synthetic climate disinformation specifically.  No clear evidence of dedicated human moderation for climate content	Third-party fact-checking organisations (via Meta's fact-checking programme);  Partnership with authoritative organisations (Climate Science Literacy Initiative with Monash, Cambridge, Yale);  Climate Misinformation Grant program;  Climate pledges with UN  2025  Third-party fact-checkers³  No evidence of ongoing support visibility, or updates for the Climate Science Literacy Initiative  Climate Misinformation Grant Programme: inactive  No evidence that the Climate Pledges tool remains active
Instagram	Climate content determined false by an authoritative third party and subject-matter experts.  2025 No updated or reaffirmed definition. Fact-checkers may rate climate-related posts using standard criteria (e.g., "False", "Missing Context").	Help educate and inform people about the realities of climate change.  2025 No current official rationale mentioned publicly.	Climate Science Center (mainly housed on Facebook, but some elements were cross-promoted on Instagram)  2025 Climate Science Center is not accessible	Automated tools and human content moderators:  Keyword detection;  2025  Automated tools remain active in the EU, but primarily target general harmful content. No evidence of dedicated automation for climate misinformation  Uses Meta's moderation systems. No public disclosure on detection of Al-generated climate disinformation on Instagram.  No clear evidence of dedicated human moderation for climate content	Third-party fact-checking organisations.  2025  ✓ Third-party fact-checkers⁴
YouTube	Non-existent.  2025 Non-existent	Non-existent.  2025 Non-existent	Information panels on climate-related videos to provide users with authoritative context.  2025  Legacy info panels' persist, but not reliably deployed in the EU	Automated tools and human content moderators. No evidence of dedicated automation for climate misinformation  2025  Automated tools and human content moderators. No evidence of dedicated automation for climate misinformation  No public evidence of tools designed to detect synthetic climate misinformation.	No formal partnerships addressing organic climate disinformation  2025  No formal partnerships addressing organic climate disinformation  Declined EU fact-checking integration under DSA
TikTok	Content that disavows the established scientific consensus.  2025  Content that disavows the established scientific consensus.  The effectiveness of its enforcement mechanisms has been called into question.	2023  Empower accurate climate discussions and reduce harmful content.  2025  Same rationale as 2023  Prohibits climate denial, but enforcement details and deployment criteria for banners or interventions are not disclosed.	2023  Search features directing users towards authoritative information.  2025  Search features directing users towards authoritative information.	Automated tools.  Human content moderators.  2025  Automated tools.  Human content moderators.  Claims to use Al tools for moderation, but no detail on their use for synthetic climate misinformation.	Third-party fact-checkers. Fartnership with authoritative organisations.  2025 Third-party fact-checkers. Partnership with authoritative organisations.
X/Twitter	2023 Non-existent 2025 Non-existent	2023 Non-existent. 2025 Non-existent	2023 Community Notes program 2025 Community Notes	2023  Unclear.  2025  Unclear	2023 Non-existent 2025 Non-existent
LinkedIn	2025 Non-existent	2025 Non-existent	2025 Non-existent	2025 Non-existent	2025 Non-existent

<sup>3, 4</sup> As of July 2025, Meta (Facebook) has not officially discontinued its third-party fact-checking program in the European Union. However, the company has expressed intentions to potentially phase out this program in the EU, contingent upon assessments related to the Digital Services Act (DSA)

 $<sup>\</sup>textbf{5, 6 For more info related to the EU:} \ \underline{\textbf{https://newsroom.tiktok.com/en-eu/an-update-on-our-work-in-countering-misinformation}}$ 

## **Types of actions**

Platform	1. Labelling of climate change misinformation	2. Downranking of climate change misinformation	3. Demonetisation of climate change misinformation	4. Strike policy	5. Removal of climate change misinformation
Facebook	Warning labels and third-party fact-checker rating system. Fact-check overlays linked to trusted climate content  2025 Fact-check overlays linked to trusted climate content: unclear	Restrictions include reducing the visibility of content and removal from algorithmic-based recommender systems.  2025  If rated false by fact-checkers, content is likely downranked, but no confirmed climate-specific rule or proactive visibility control.	2023  ✓ Content that has been rated false by a third-party fact-checker is ineligible to monetise.  2025  ✓ Content that has been rated false by a third-party fact-checker is ineligible to monetise.	Meta's strike policy for violating Community Standards. On Facebook, strikes will lead to different restrictions.  2025  Meta's general strike system applies. No climate-specific criteria, but policy still in force for Community Standards violations.	2023  Content removal will be applied when it violates Meta's general Community Standards and Ads policies.  2025  Content may be removed if violate Community Standards or Ads Policy. No clarification on whether Al-generated climate disinfo is treated differently from other misinformation.
Instagram	Warning labels and third-party fact-checker rating system.  Fact-check overlays linked to trusted climate content  2025  Fact-check overlays linked to trusted climate content: unclear	2023  Restrictions include reducing the visibility of content and removal from algorithmic-based recommender systems.  2025  If rated false by fact- checkers, content is likely downranked, but no confirmed climate-specific rule or proactive visibility control.	2023  Content that has been rated false by a third-party fact-checker is ineligible to monetise.  2025  Content that has been rated false by a third-party fact-checker is ineligible to monetise.	2023  Meta's strike policy for violating Community Guidelines.  2025  Meta's general strike system applies. No climate-specific criteria, but policy still in force for Community Standards violations.	2023 Content removal will be applied when it violates Instagram Community Guidelines and Ads policies.  2025 Content may be removed if it violates general policies (e.g., hate speech, incitement). No dedicated removal policy for climate disinfo No indication that synthetic or Al-generated climate content is flagged separately.
YouTube	2023 Limited to info panels under some videos.  2025 Still dependent on legacy info panels	Non-existent.  2025 Non-existent.	Prohibits monetisation of content that contradicts well-established scientific consensus around the existence and causes of climate change.  2025 Policy remains in place	2023 Strike policy for violating Community Standards.  2025 General enforcement remains;	Content may be removed if it violates Community Guidelines or Ads policies. No climate-specific removal rule exists.  2025  Content may be removed if it violates Community Guidelines or Ads policies. No climate-specific removal rule exists.  No climate-specific removal rule, including for Al-generated misinformation.
TikTok	2023  Warning labels only if fact-checking results are inconclusive. TikTok prompt people to reconsider sharing such content. No proactive labelling for confirmed climate misinformation.  2025  Same policy remains	2023  Content becomes ineligible for recommendation into anyone's 'For You feed'. 8  2025  Same policy applies	2023  Content is ineligible to monetise if it does not abide by the Community Guidelines (where climate change misinformation is included).  2025  Policy remains unchanged.	2023 Strike policy for violating the Community Guidelines. 2025 Policy continues	2023 Climate change misinformation is, in theory, actively removed by the platform if undermining wellestablished scientific consensus.  2025 Policy remains in place. No indication whether Al-generated content is addressed differently.
X/Twitter	2023 Non-existent  2025 Non-existent	2023 Non-existent 2025 Non-existent	2023 Non-existent 2025 Non-existent	2023 Non-existent 2025 Non-existent	2023 Non-existent 2025 Non-existent
LinkedIn	2025 Non-existent	2025 Non-existent	Non-existent  2025  Not applicable; LinkedIn does not monetize user content similarly to other platforms	2025 Non-existent Non-existent	2025 Non-existent Non-existent

<sup>7</sup> For example, if it contains dangerous hate speech or leads to imminent physical harm. 8 This means that as a user we could still search for and find the content, but the platform will not proactively curate the content in our newsfeed.

## **Type of content**

Platform	Organic content	Advertisement content
Facebook	Climate change misinformation casting doubt on the existence of climate change and scientific data, minimising its impact, discrediting solutions to climate change or promoting climate 'doomism'.  Meta actively addressed climate misinformation especially by relying on third-party fact-checkers and overlays.  2025  The above definition has not been reaffirmed or updated publicly since 2022.  Third-party fact-checkers may still apply ratings (e.g., "False", "Missing Context") to climate-related posts under general misinformation guidelines. There is no public evidence of targeted enforcement, visibility initiatives, or updated guidance specific to climate change content.	Meta prohibits ads that include content debunked by third-party fact-checkers. Advertisers that repeatedly post information deemed to be false may have restrictions placed on their ability to advertise across Meta technologies. Meta requires all active ads to be available in the public Ad Library and provide additional information for those ads engaging in advocacy around energy and/or climate change.  2025  These policies have not been reaffirmed, and the Climate Misinformation Grant Programme is inactive.  Meta still enforces general ad rules against misinformation and mandates disclosure for political/issue ads, but there is:  No evidence of a climate-specific advertising enforcement or update.  The Ad Library still operates but lacks climate-specific filters or transparency tools.
Instagram	Climate change misinformation casting doubt on the existence of climate change and scientific data, minimising its impact, discrediting solutions to climate change or promoting climate 'doomism'.  Climate misinformation was addressed indirectly through Meta's umbrella policies. While no Instagram-specific documentation existed, enforcement aligned with Facebook's 2023 approach.  2025  No reaffirmed or updated definition of climate misinformation for Instagram.  Third-party fact-checkers may still rate climate-related content using general misinformation criteria (e.g., "False", "Missing Context"), but there is no visibility or public explanation of how this is applied specifically to climate content.	Meta prohibits ads that include content debunked by third-party fact-checkers.  Advertisers that repeatedly post information deemed to be false may have restrictions placed on their ability to advertise across Meta technologies. Meta requires all active ads to be available in the public Ad Library and provide additional information for those ads engaging in advocacy around energy and/or climate change.  Advertising climate disinfo was restricted under Meta-wide ad rules, with climate advocacy ads tracked in the Ad Library.  2025  General ad policies remain in place (e.g., prohibition of false claims, transparency for issue ads), but:  No climate-specific ad enforcement or visibility.  The Climate Misinformation Grant Programme is inactive.  No mention of climate in Instagram ad tools or moderation guidance.  Ad Library exists, but with limited transparency on climate topics.
YouTube	<ul> <li>2023 ✓ Limited enforcement. • No climate-specific moderation framework in place. • No labels, warnings, or systematic removals targeting climate disinfo. • Info panels displayed under some climate-related videos, but coverage was inconsistent, especially across EU languages. 2025 ✓ Still limited and unclear. • No climate-specific moderation or updated enforcement framework. • General Community Guidelines may apply (e.g., harmful misinformation), but no dedicated climate policy or definitions. • "Legacy info panels" persist, but not reliably deployed in the EU; no visibility of active climate information systems or fact-checking overlays.</li> </ul>	Advertising policies prohibit content referring to climate change as a hoax or a scam, or which includes claims denying that long-term trends show the global climate is warming, and claims denying that greenhouse gas emissions or human activity contribute to climate change.  2025  This ad policy remains active  Transparency on enforcement (e.g., metrics, volume, geographic scope) is not available.  No public signal that YouTube actively expands climate ad moderation (e.g., beyond denial to include misrepresentation or greenwashing).
TikTok	2023 Climate change misinformation denying the existence of climate change or the human factors that contribute to its proliferation.  2025 Policy still in effect, but enforcement unclear	2023  Advertising Policies (Industry entry and Ad Creatives) do not specifically prohibit climate change misinformation among the long list of content bans. However, it is mentioned that ad creatives must adhere to TikTok Community Guidelines (where climate change misinformation is included).  2025  No specific update to ad policies regarding climate misinformation
X/Twitter	2023 Non-existent.  2025 Non-existent.	Unclear if the prohibition of misleading <u>advertisements</u> that contradict the scientific consensus on climate change has been implemented. The ban was announced on Earth Day 2022, but not reaffirmed or enforced post-Musk acquisition  2025  No evidence of an active policy prohibiting climate disinfo ads. Prior commitments appear to have been dropped.
LinkedIn	2025 Non-existent.	2025  Not applicable. LinkedIn does not monetise user-generated content in the same way as other platforms. No specific ad policy addresses climate misinformation.

<sup>9</sup> This was launched months before Elon Musk's arrival and it is not certain if it was put in place: <a href="https://blog.twitter.com/en\_us/topics/company/2022/accelerating-our-climate-commitments-on-earth-day">https://blog.twitter.com/en\_us/topics/company/2022/accelerating-our-climate-commitments-on-earth-day</a>. It is not included in the ads content policy of X/Twitter: <a href="https://business.twitter.com/en/help/ads-policies/das-content-policies/inappropriate-content.html">https://business.twitter.com/en/help/ads-policies/ads-content-policies/inappropriate-content.html</a>

## **CONCLUSIONS / NEXT STEPS**

This update confirms that while some platforms have taken isolated steps to address climate disinformation, a comprehensive and accountable moderation ecosystem remains absent. Enforcement mechanisms remain undefined or untransparent, and climate-specific rules are often buried within broader misinformation frameworks.

Going forward, efforts should prioritise:

- EU-level classification of climate disinformation as a systemic risk under the DSA.
- Stronger mandates for disaggregated transparency reporting and algorithmic audits.
- Platform-specific policy improvements including clear definitions, factchecking integration, and synthetic media governance.
- Ongoing monitoring will be necessary to track whether these gaps are meaningfully addressed ahead of COP30 and beyond.

More broadly, platform responses remain hampered by structural weaknesses in transparency and governance. No platform has integrated climate risks into systemic audits of their recommender systems, nor disclosed how their moderation tools, whether human or automated, are tailored to detect climate-specific or Al-generated disinformation. These blind spots limit the effectiveness of even the most well-intentioned policy efforts and underscore the need for regulatory clarity and sustained pressure from civil society.

This analysis is intended to inform EU policy efforts, civil society monitoring, and future platform accountability mechanisms on climate disinformation.







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