

CAAD calls on the largest online platforms to address climate disinformation, starting now!

- Today the European Commission has officially designated 19 online platforms as being in scope of the Digital Services Act (DSA).
- This is a milestone for the European Union in responding to the threats online disinformation poses to democratic integrity and it comes as many of these companies are taking steps backward in their commitments to transparency, accountability and supporting the democratic process.
- Climate disinformation is one of the most rampant and dangerous forms of disinformation that not only derails climate action but also feeds [polarisation](#) and threatens all democratic processes in the EU, as the EU Parliament's [Special Committee Report](#) stated.
- CAAD calls on these companies to see the EU designation as a wake-up call to start ambitious action against climate disinformation.

The Digital Services Act (DSA), is the EU's new regulatory regime to ensure a safe, transparent, and accountable online environment. The DSA will apply to a range of digital services, but by far the most important changes relate to so-called Very Large Online Platforms or Search Engines (VLOPs and VLOSEs). These platforms play a disproportionate or systemic role in the EU's online landscape - reaching at least 10% of the EU's population, or 45 million end users monthly - and therefore may catalyse or amplify societal risks, for instance to elections and public health. In some cases, these companies have an even larger audience than the threshold for VLOPs and VLOSEs, with YouTube reaching 400 million Europeans a month.

The DSA could drastically shift the architecture and priorities of tech companies that have been considered 'too big to fail' thus far, and afforded enormous leeway in self-regulating harms like climate disinformation to date. Following the Commission's announcement, these platforms have four months to comply with many of the DSA's obligations for VLOPs and VLOSEs, including implementation of adequate content moderation capacities, user-facing transparency measures, and their first annual "systemic risk assessment".

But we cannot afford to wait until the summer, likely to be once again the hottest on record, for platforms to act. This step in the DSA process comes just weeks after release of the latest IPCC report, which highlights how climate mis- and disinformation are thwarting effective responses to climate change, undermining climate science and perpetuating “social inertia”.

The designation clearly shows that online platforms such as Facebook, Google, Twitter and Tiktok have a responsibility to curb exposure to climate disinformation for EU citizens; as [CAAD research](#) has repeatedly shown, their current architecture and business models have the opposite effect, aiding and abetting vested interests to organise, monetise and proliferate disinformation. Recognition around the urgency and scale of this challenge was demonstrated in March 2023, when the Special Committee on foreign interference in all democratic processes in the European Union (ING2) held the [Parliament's first official hearings](#) on climate mis- and disinformation, with input from the Committee on the Environment, Public Health and Food Safety (ENVI) and the Panel for the Future of Science and Technology (STOA). As they highlighted, false and misleading content directly undermines public support for the EU's Green Agenda and 2030 targets.

The European Union has set a clear timeline for these platforms to make meaningful changes, but this work needs to start today. This work should have started many years ago, when alarm bells were already being sounded across the climate sector and by disinformation experts. Companies with huge resources at their disposal need not wait for the Commission to dot every “i” and cross every “t” of the secondary legislative elements before they start addressing the risks we've known about for years.

Since all of these designated platforms operate globally, actions to address climate disinformation should not be limited to the EU. Climate impacts transcend borders and are often most acutely felt outside of the EU. Meanwhile, the attention companies pay to online harms has focussed myopically on English-language content and countries in the Global North, while disinformation, abuse and manipulation of platforms runs rampant in other key contexts. The DSA should be an opportunity to forefront safety-by-design principles and safeguarding of users, not only to the benefit of the EU, but wider online and information ecosystems.

Over the coming months, CAAD urges the newly designated VLOPs and VLOSEs to take the following measures to address climate disinformation on their services. All of these can be seen as DSA compliance measures, as the table below shows.

1. Produce and publicise a transparent company plan to stop the spread of climate disinformation, greenwashing, hate speech, and content that jeopardises public health and security on their platforms that includes:
2. Release publicly available assessments of how product or design changes affect the spread of climate disinformation and hate speech before they are implemented.
3. Allow public interest researchers and academics to access non-personal data related to content, including user generated content, promoted content and paid advertising.
4. Adopt a [universal definition](#) of climate mis- and disinformation
5. Prevent the monetisation of climate disinformation aligned with the definition through advertisements and search, including “greenwashing.”
6. Report annually on the prevalence of foreign interference and coordinated influence operations relating to climate disinformation, as well as fossil fuel industry-sponsored disinformation efforts on their products and services.
7. Engage in public communications to educate users on detecting and limiting the spread of disinformation, on climate as well as intersecting issues (e.g. public health, civil rights, electoral integrity).

ANNEX – I: WHAT ARE THE LARGE PLATFORMS OBLIGED TO DO?

Mandates - Online Platforms	Related DSA Article / EU Legislation
<p>Produce and publicise a transparent company plan to stop the spread of climate disinformation, greenwashing, hate speech, and content that jeopardises public health and security on their platforms</p>	<p>Article 35 of the DSA requires VLOPs/VLOSEs to put in place tailored measures to address their systemic risks, for instance the risk to public health</p>
<p>Release publicly available assessments of how product or design changes affect the spread of climate disinformation and hate speech before they are implemented</p>	<p>Articles 34 – 35 of the DSA require VLOPs/VLOSEs to identify, analyse and assess their systemic risks including risks related to their design.</p> <p>Article 35(f) explicitly proposes “reinforcing the internal processes, resources, testing, documentation, or supervision of any of their activities in particular as regards detection of systemic risk”</p>
<p>Allow public interest researchers and academics to access non-personal data related to content, including user generated content, promoted content and paid advertising</p>	<p>Article 40 of the DSA will oblige VLOPs/VLOSEs to share data with vetted researchers</p> <p>Article 39 will oblige them to set up comprehensive searchable public libraries of their advertisements</p>
<p>Adopt a universal definition of climate disinformation</p>	<p>A definition of climate disinformation can be seen as a risk mitigation measure under Article 35. In addition, Article 14 requires clear and transparent terms and conditions</p>
<p>Prevent the monetisation of climate disinformation aligned with the definition</p>	<p>This could clearly be seen as a risk mitigation measure under Article 35. Demonetising disinformation is also a commitment under the Code of Practice</p>

Mandates - Online Platforms	Related DSA Article / EU Legislation
through advertisements and search, including “greenwashing.”	on Disinformation, set to become a Code of Conduct
Report annually on the prevalence of foreign interference and coordinated climate disinformation influence operations, as well as fossil fuel industry-sponsored disinformation efforts on their services	This could clearly be seen as a risk mitigation measure under Article 35. “coordinated disinformation campaigns” are specifically mentioned in Recital 83 as systemic risks. In addition Article 42 requires bi-annual transparency reporting related to content moderation and to risk mitigation efforts
Engage in public communications to educate users on detecting and limiting the spread of disinformation	The Code of Practice on Disinformation to become a Code of Conduct under Article 45 requires signatories to engage in media literacy and awareness raising measures