

Underperforming & Unprepared

How have platforms responded
to EU legislation for online safety so far?



Climate Action
Against Disinformation



Executive Summary

In 2024, more than 400 million people will vote in the EU elections during a period plagued by two crises: rampant disinformation and the devastating impacts of climate change. The previous year, [2023, was recorded as the hottest ever in human history](#). At the same time, the frequency of climate disinformation and greenwashing campaigns rose, alongside [an influx of death threats targeting scientists](#). The World Economic Forum has recently [named disinformation as the world's greatest threat](#). The convergence of these two crises poses significant challenges for EU citizens, jeopardizing online information integrity and impeding climate action and policy. Additionally, it widens societal and political divisions in Europe.

In response to the mis- and disinformation crisis, the EU introduced the [Digital Services Act](#) (DSA) and is in the process of creating a Code of Conduct based on a voluntary Strengthened [Code of Practice on Disinformation](#) (Code). These regulations were designed to protect the online space, shield citizens from societal manipulation and misinformation, and defend fundamental freedoms, including the right to information. They aim to achieve this by specifying the duties and authorities of Very Large Online Platforms (VLOPs), like Meta and TikTok, and Very Large Online Search Engines (VLOSEs), such as Google.

As the European Parliamentary elections approach, it's critical to analyse how online platforms and search engines have responded to the EU regulations to prevent climate disinformation. Therefore, the Climate Action Against Disinformation (CAAD) coalition has created a scorecard to analyse the latest Strengthened Code of Practice Reports and the first round of DSA Transparency Reports provided by large online platforms. This evaluation is intended to understand the efficacy of the EU regulations to safeguard public discourse.

Despite these landmark initiatives, our analysis indicates that most online platforms and search engines are significantly underperforming in their responses to climate mis- and disinformation. The enforcement of DSA and other EU regulations has not yet prompted policies and processes necessary to prevent the dissemination of climate misinformation in EU countries. The scorecard shows a failure to adequately address concerns regarding the advertising and monetisation of such content, as well as its moderation.



Although some platforms have taken initial steps to address climate misinformation, all of them have scored poorly. The highest score of 4.5 out of 18 was awarded to Facebook and TikTok

All of the VLOPs examined fail to:

- › Include climate misinformation as a category when reporting on content removed from their advertising platforms;
- › Report on users and brands who repeatedly breach community standards for spreading climate misinformation, or impose restrictions on them;
- › Report on intentional manipulation of their services for the purposes of climate misinformation;
- › Implement policies restricting advertising campaigns from the fossil fuel sector;
- › Implement a process for delisting climate misinformation within its search function, or in any other way address climate misinformation in discussion of recommender systems;
- › Implement any policies prohibiting greenwashing in advertising, as per the [CAAD definition of climate disinformation](#).

Some are ahead of others:

- › Pinterest is the only platform reporting on the number of actions taken on content and users flagged for climate misinformation, while Facebook and TikTok scored the most points for engaging the public on the spread of disinformation and leading media literacy campaigns to educate users on climate science.

An 18-point assessment question system was used to analyse current misinformation policies at LinkedIn, Facebook, Instagram, Pinterest, Snapchat, TikTok, YouTube and X, using the latest Strengthened Code of Practice Reports and the first round of DSA Transparency Reports.

Snap, Pinterest and X are not part of the Strengthened Code of Practice on Disinformation, which, at the time of writing, is voluntary. The Code of Practice is in the process of becoming the Code of Conduct under the DSA (article 35). The DSA is compulsory under EU law.

Emerging threat in the EU: Climate Disinformation

The 2024 European Parliament elections will see over 400 million voters cast their ballots during a time climate disinformation threatens to poison public discourse and sabotage climate action. It's clear that climate disinformation is bad for democracy: it undermines informed decision-making within public institutions, erodes trust in institutions, and manipulates public opinion. In addition to stalling the necessary climate action to limit human-induced global warming to 1.5°C as per the Paris Agreement, disinformation also fosters division within broader society.

With rising temperatures come extreme weather events, displacement, food insecurity, and economic devastation. The Intergovernmental Panel on Climate Change (IPCC) has already [confirmed that irreversible damage is occurring to natural ecosystems, communities, and human rights](#).



If global temperature rise surpasses 1.5°C, we risk the total collapse of vital food systems, & mass extinctions.

The window for meaningful change is [rapidly closing](#); failing to act decisively now will condemn current and future generations to a world of instability and suffering.

Amidst escalating climate challenges, climate scientists and advocates face increasing online attacks, indicative of a concerted effort to disrupt climate policy. Obstructionists are resorting to desperate tactics in the age of record-shattering temperatures and climate disasters. Their strategies often involve coordinated disinformation campaigns and greenwashing efforts designed to sow doubt in the public's mind. [Historically](#), high-polluting interests have been implicated in funding and amplifying misinformation, creating obstacles to meaningful climate action.

Failing to act on climate change and meet this legally binding international treaty poses a significant risk to public health within the EU. Nonetheless, misinformation and disinformation [have impeded global climate progress](#) for decades, with Big Tech platforms actively playing a role in facilitating [its spread for the fossil fuel industry and other high-polluting sectors](#). The status quo must drastically change for the EU [to cut greenhouse gas emissions by at least 55% by 2030 under EU law](#) and to [hit its own legally binding net zero target by 2050](#).

The Response from EU Lawmakers

Climate disinformation is recognised as a vital challenge to the resilience of European democracies, undermining societal debates with false and misleading information. The EU has become the first-ever policymaking body to acknowledge the need to officially tackle the issue. EU Parliament Lawmakers overwhelmingly [backed](#) a report on foreign interference in all democratic processes within the European Union, calling for the EU to “urgently address climate mis- and disinformation” and implement a “global code of conduct”. According to the [EU](#), disinformation related to climate change ranked as the third most detected theme of disinformation in the EU in 2022, behind COVID-19 disinformation and the war in Ukraine.

Simultaneously, the EU has led efforts to roll out new and evolving regulations to target both the hosts and creators of online disinformation. The 2018 [EU Code of Practice on Disinformation](#), a collaboration between the European Commission and online platforms, was introduced to combat the spread of misleading content. The online platforms voluntarily pledged to enhance transparency, cut off funding for disinformation and curb its dissemination, especially during election periods. This voluntary framework of industry self-regulation evolved into the [Strengthened Code of Practice on Disinformation](#). It is currently in the process of becoming legally binding under the DSA. While the code has achieved some success, areas for improvement remain, prompting the development of a more robust version.

As of 17 February 2024, the DSA, a new legally binding legislation came into effect to make the Internet a safer place for European citizens by introducing a more stringent regulatory framework.¹ The DSA exists to address widespread problems in digital markets, enhance transparency, and curb illegal activities, including disinformation efforts aimed at exploiting public opinion. While major digital players previously held significant rule-making power, the DSA ensures fairness, safety, and accountability across the board.

However, while the DSA’s purpose may seem simple, compliance can be complex. It covers a broad range of digital services and areas, requiring businesses to carefully assess how the law applies to their specific operations. This innovative regulation clearly outlines the roles and responsibilities of VLOPs and VLOSEs such as Google, Meta and TikTok, creating a safe online environment for EU citizens.

¹A breach of the DSA may result in the Commission imposing fines of up to 6% of the global turnover of the VLOP or VLOSE, as well as an order to address any breaches by a specified deadline. Since August 2023, DSA rules have been applied to platforms with more than 45 million users in the EU.

The final version of the DSA details tech companies' new legal obligations, as well as the responsibilities of the EU and member states with regard to its enforcement. It [includes](#):

- Clear rules for dealing with illegal content;
- New rights for users to challenge content moderation decisions;
- More transparency on recommender systems and online advertising;
- Limited restrictions on targeted advertising and deceptive designs;
- General transparency and reporting requirements;
- Obligations for the largest platforms to rein in “systemic risks”;
- Legally-mandated data access for external scrutiny;
- New competencies and enforcement powers for the European Commission and national authorities.

The DSA fosters a co-regulatory framework, placing much trust in designated VLOPs and VLOSEs. However, there is currently [an absence of specific provisions addressing climate misinformation in the legislation](#). This gap raises concerns that platforms will continue to ignore climate misinformation as a serious threat to the public, despite it often containing denial, greenwashing and hate speech.

Currently, the DSA makes it clear that platforms “must identify, analyse, and assess systemic risks that are linked to their services”. The DSA [identifies](#) these as:

- Fundamental rights, such as freedom of expression, media freedom and pluralism, discrimination, right to access information, consumer protection and children’s rights;
- Public security and electoral processes;
- Gender-based violence, public health, protection of minors, and mental and physical wellbeing;
- The dissemination of illegal content.

THE ANALYSIS: Platforms' Initial Performances

The proliferation of climate change disinformation poses a critical threat to the urgent global response required to mitigate the crisis. Recognising this danger, the Climate Action Against Disinformation (CAAD) coalition, a unified front of climate and anti-disinformation organizations, has taken a leading role in exposing, analysing, and countering the spread of harmful climate-related disinformation.

The coalition's scorecard scrutinises two key regulatory efforts from the European Union: the Strengthened Code of Practice Reports and the initial round of DSA Transparency Reports. The Strengthened Code of Practice on Disinformation sets out voluntary guidelines for VLOPs, while the Digital Services Act (DSA) enforces transparency measures, requiring platforms to disclose data on their efforts in combating disinformation.

CAAD's mission goes beyond simple analysis of adherence to this legislation. The coalition seeks to highlight the tactics of climate disinformation, revealing deceptive narratives, the networks that amplify them, and their harmful consequences. By understanding the strategies used to undermine climate science and sow public confusion, CAAD works to empower policymakers, the public, and responsible media with knowledge and tools to combat this threat.

The coalition's scorecard examines whether the reported actions of these major platforms and search engines offer adequate protection against the sophisticated and constantly evolving landscape of climate disinformation. Their insights hold platforms accountable and drive improvements to safeguard public discourse from manipulation and ensure the public has reliable information to guide their decisions on climate action.

The scorecard consists of 18 key questions prepared meticulously by reviewing the EU regulations for preventing the spread of disinformation and the policy asks for platforms developed by CAAD to drive climate action against disinformation.

These questions were used to analyse current misinformation policies at LinkedIn, Facebook, Instagram, Pinterest, Snapchat, TikTok, YouTube and X, using the latest Strengthened Code of Practice Reports and the first round of DSA Transparency Reports.

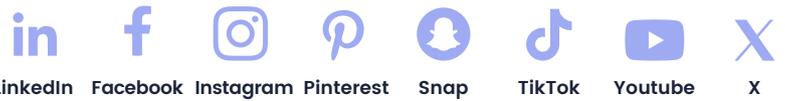
The analysis shows that all the platforms and search engines are underperforming as their reports largely failed to reflect how they address the threat of climate mis- and disinformation.

Although some platforms and search engines have taken initial steps to address climate misinformation, all of them have scored poorly. the highest score of 4.5 out of 18 was awarded to Facebook and TikTok, while X scored 0.5 out of 18. This indicates that these platforms are inadequately prepared to adhere to the DSA regulations and thus fail to effectively prevent the spread of climate disinformation on their platforms.

Our findings



	LinkedIn	Facebook	Instagram	Pinterest	Snap	TikTok	Youtube	X
Is the platform displaying all climate-change related adverts in its advertising library? Does it display meaningful meta information, such as demographic, geographic and interest targeting, amount spent and impressions earned?	0.5	1	1	0.5	0.5	1	1	0.5
Does the platform have a monetisation policy relating to climate change? And is it reporting on content being demonetised in some way?	0.5	0	0	0	0	0.5	0.5	0
Are advertising content removals broken down by categories that include climate misinformation?	0	0	0	0	0	0	0	0
Does the platform make clear in its reports to the EU that it generates financial profits from the promotion of the fossil fuel industry?	0	0	0	0	0	0	0	0
Does the platform have any policies restricting advertising campaigns from the fossil fuel sector?	0	0	0	0	0	0	0	0
Does the platform have any policies prohibiting greenwashing in advertising, as per the universal definition of climate misinformation?	0	0	0	0	0	0	0	0
Does the platform outline climate misinformation in its community standards?	0	0	0	1	0	0.5	0	0
Does the platform have a process for delisting climate misinformation within its search function, or in any other way address climate misinformation in discussion of recommender systems?	0	0	0	0	0	0	0	0
Does the platform transparently explain its fact-checking processes and enforcement measures in relation to climate misinformation to its users?	0	0.5	0.5	0.5	0	0	0	0
Does the platform recognise the threat of selling or sharing personal data to harmful advertisers or data brokers – such as fossil fuel industry groups – to the spread of disinformation?	0	0	0	0	0	0	0	0



	LinkedIn	Facebook	Instagram	Pinterest	Snap	TikTok	Youtube	X
In its risk assessment, does the platform notify how product or design changes will affect the spread of climate misinformation before implementation?	0	0	0	0	0	0	0	0
Does the platform already allow academics and other climate misinformation researchers to access non-personal data related to content, including user-generated content, promoted content and paid advertising?	0.5	1	1	0	0.5	0.5	0.5	0
In its reports of intentional manipulation of its services, does the platform report on manipulation for the purposes of climate misinformation?	0	0	0	0	0	0	0	0
Does the platform report on the number of actions taken on content flagged for climate misinformation?	0	0	0	1	0	0	0	0
Does the platform report on the number of actions taken on users flagged for climate misinformation?	0	0	0	1	0	0	0	0
Does the platform report on users and brands who repeatedly breach community standards for spreading climate misinformation? And does it impose restrictions on them?	0	0	0	0	0	0	0	0
Does the platform engage in public communications to educate users on detecting and limiting the spread of disinformation, or media literacy campaigns to educate users on climate science?	0	1	0	0	0	1	0	0
Has the platform allocated resources to monitor content and enforce policies on climate change in all languages equitably?	0	1	1	0	0.5	1	1	0
TOTAL SCORE	1.5	4.5	3.5	4	1.5	4.5	3	0.5

Discussion

All of the platforms scored poorly and there are several areas where all platforms scored zero.

All of the VLOPs examined failed to:

- Include climate misinformation as a category when reporting on content removed from their advertising platforms;
- Report on users and brands who repeatedly breach community standards for spreading climate misinformation, or impose restrictions on them;
- Report on intentional manipulation of their services for the purposes of climate misinformation;
- Implement policies restricting advertising campaigns from the fossil fuel sector;
- Implement a process for delisting climate misinformation within its search function, or in any other way address climate misinformation in discussion of recommender systems;
- Implement any policies prohibiting greenwashing in advertising, as per the [CAAD definition of climate disinformation](#).

Working on any of the policies and processes listed above would immediately set a platform apart from the others. There are also policies and processes individual platforms need to focus on, by following the progress achieved by others.

	Score	What's going well	Areas for improvement
 LinkedIn	1.5	<ul style="list-style-type: none"> > Scores minimal points for compliance with legislation (ad library, research API). > By default does not monetise climate misinformation 	<ul style="list-style-type: none"> > Develop a better advertising library > Recognise climate misinformation in any platform standards > Report on content removed for climate misinformation > Open up API to climate misinformation researchers > Direct existing media literacy resources to climate change <p>All areas listed in box 1</p>
 Facebook	4.5	<ul style="list-style-type: none"> > Advertising library > Fact-checking network > Media literacy campaigns > Good spread of content moderation across the EU 	<ul style="list-style-type: none"> > Add climate misinformation to community standards and demonetisation policy > Report on content removed for climate misinformation > Include fossil fuel accounts by default in Social, Issue, Election and Politics advertising <p>All areas listed in box 1</p>
 Instagram	3.5	<ul style="list-style-type: none"> > Advertising library > Fact-checking network > Good spread of content moderation across the EU 	<ul style="list-style-type: none"> > Add climate misinformation to community standards and demonetisation policy > Report on content removed for climate misinformation > Include fossil fuel accounts by default in Social, Issue, Election and Politics advertising > Implement media literacy work that is already happening at sister platform Facebook <p>All areas listed in box 1</p>
 Pinterest	4.5	<ul style="list-style-type: none"> > Climate misinformation in community standards > Reports on climate misinformation 	<ul style="list-style-type: none"> > Develop a better advertising library > Include climate misinformation in advertising standards and demonetisation policy > Develop media literacy campaigns > Open up API to climate misinformation researchers > Accelerate joining of Strengthened Code (soon mandatory) <p>All areas listed in box 1</p>

	Score	What's going well	Areas for improvement
 Snap	1.5	<ul style="list-style-type: none"> > Scores minimal points for complying with legislation (ad library, research API, moderation across some languages) 	<ul style="list-style-type: none"> > Develop a better advertising library > Recognise climate misinformation in any platform standards > Report on content removed for climate misinformation > Open up API to climate misinformation researchers > Accelerate joining of Strengthened Code (soon mandatory) All areas listed in box 1
 TikTok	4	<ul style="list-style-type: none"> > Climate misinformation in community standards > Good advertising library > Good spread of content moderation across the EU 	<ul style="list-style-type: none"> > Use universal definition of climate change disinformation > Report on content removed for climate misinformation > Direct existing media literacy resources to climate change > Open up API to climate misinformation researchers All areas listed in box 1
 Youtube	3	<ul style="list-style-type: none"> > Advertising library > Includes climate misinformation in advertising and demonetisation policy > Good spread of content moderation across the EU 	<ul style="list-style-type: none"> > Use universal definition of climate change disinformation > Include climate misinformation in community standards misinformation > Report on content removed for climate misinformation > Open up API to climate misinformation researchers > Include fossil fuel companies by default in social, issue and election advertising All areas listed in box 1
 X	0.5	<ul style="list-style-type: none"> > Has a minimum standard advertising library - nothing else. 	<ul style="list-style-type: none"> > Recognise climate misinformation in any platform standards > Report on content removed for climate misinformation > Open up API to climate misinformation researchers > Re-join Strengthened Code (soon mandatory) All areas listed in box 1

Recommendations

We emphatically urge policymakers and regulatory bodies to prioritise the findings of this comprehensive analysis. It provides an invaluable roadmap for refining and implementing targeted policies designed to decisively combat the proliferation of climate misinformation within online environments. The systemic risks posed by climate denial and misleading narratives are undeniable, and decisive action is paramount.

Key recommendations: This analysis underscores the need for a multi-pronged approach. Regulatory bodies must further enforce the VLOPs to improve their regulations and policies to ensure that they:

- **Recognise the magnitude of the threat:** Officially classifying climate change and its associated disinformation as a “systemic risk” reflects the scale of the challenge and the potential for widespread harm across society, the environment, and the economy.
- **Target disinformation networks:** Identify and disrupt the well-established actors and networks that manufacture and disseminate climate misinformation. Policies must address the underlying structures and incentives that drive these networks.
- **Strengthen transparency and accountability:** Provide robust transparency reporting that reveals the true scale of climate misinformation and enables policymakers to assess the effectiveness of platform interventions. Allow all researchers to have access to the transparency reports, not just academics from established institutions.

Recommendations

CAAD urges appointed Digital Service Coordinators for Very Large Online Platforms (VLOPs) to prioritise mitigating climate misinformation on VLOPs as per Articles 34 and 35. These state that VLOPs are obliged to diligently identify, and analyse any systemic risks in the EU stemming from the design or functioning of their service and its related systems, or from the use of their services. The climate crisis is directly related to systemic risks identified by the DSA, posing a threat to the [public health](#) and individual freedom of citizens in EU member states. Combatting climate misinformation is crucial to support the overarching goals of maintaining habitable and democratic environments for European citizens. Climate misinformation deceives online users, undermining wider efforts [to help EU countries cut greenhouse gas emissions by at least 55% by 2030 under EU law and reaching net zero by 2050.](#)

We urge EU regulators to pay close attention to the negative effects of climate misinformation on [civic discourse and electoral processes](#), [public security](#) and [gender-based violence](#), all identified as systemic risks under the DSA. Moreover, [climate misinformation jeopardises democratic processes](#) and is increasingly playing a central role in EU general elections, with [the Netherlands](#) and [Spain](#) serving as recent case studies. 2024 is also a significant election year outside of the EU with the United States and the United Kingdom expecting presidential and parliamentary elections. There is a high risk that climate misinformation generated by election campaigns in both countries will permeate the EU's digital information sphere, affecting democratic processes on a member-state level.

We urge platforms to acknowledge the threat of climate disinformation and take immediate steps to improve transparency and data access to quantify disinformation trends. Reviewing the assessment above, they must use it as a means to improve their policies in a way that slows the spread of climate misinformation, as well as improves overall product quality and safety. Adopting a standardised and comprehensive definition of climate disinformation, we also urge platforms to take steps to stop misleading fossil fuel advocacy in paid ad content and enforce policies against repeat offenders spreading climate mis- and disinformation. Regulations are intended to serve as foundational baselines, not limits on the actions platforms can take.

Conclusion

The DSA marks a pivotal stride in safeguarding European Union citizens amidst a rapidly evolving online environment, especially with the arrival of generative AI, which has already been used for creating and disseminating misinformation. It serves the dual purpose of upholding freedom of speech while shielding users from deceptive and harmful content. However, in a year filled with significant political elections – both inside and outside the EU – a significant amount of work remains to be accomplished in addressing online climate mis- and disinformation, alongside its associated risks to public health, public security and democracy.

We strongly advocate for an official recognition that climate change and its associated disinformation are a “systemic risk” to the EU member states.

Or, at the very least, we urge regulators to interpret climate misinformation as an obstacle to the EU’s public health and public security, both of which are already identified as systemic risks under the DSA.

Eliminating climate misinformation is integral to safeguarding the EU’s environmental commitments, protecting public freedom, fostering informed civic discourse and addressing the societal threats posed by a rapidly degrading environment. Therefore, we urge regulators to mandate VLOPs to align their policies with the recommendations delineated in this report.

About the Climate Action Against Disinformation Coalition (CAAD):

CAAD is a group of more than 50 organisations committed to addressing content that perpetuates false narratives on our environment and dilutes productive conversations on the climate. We hold Big Tech accountable for their role in allowing climate mis/disinformation to spread on their platforms and engage decision-makers at the national and international level to enforce accountability and bring political awareness to the problem. CAAD relentlessly pursues accountability and a good-faith dialogue around our environment that leads us toward substantive climate solutions.

Disclaimer: This briefing is for informational purposes only. All information is provided in good faith. While we have done our best to verify the accuracy of the information presented as of the date appearing at the top of the report, we make no representation or warranty of any kind, express or implied, regarding the accuracy, adequacy, validity, reliability, or completeness of such information.

CAAD Policy Asks:

Specifically, governments should require that social media, advertising technology, broadcast and publishing companies:

- 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 Community content standards
- 3 An enforcement mechanism for violation of the standards
- 4 A greater allocation of resources to monitor content in all languages and local dialects
- 5 An explanation of any fact-checking processes
- 6 A robust public input mechanism for content flagging
- 7 Release publicly available assessments of how product or design changes affect the spread of climate disinformation and hate speech before they are implemented.
- 8 Allow public interest researchers and academics to access non-personal data related to content, including user generated content, promoted content and paid advertising.
- 9 Adopt a universal definition of climate disinformation.
- 10 Prevent the monetisation of climate disinformation aligned with the definition through advertisements and search, including “greenwashing.”
- 11 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.
- 12 Engage in public communications to educate users on detecting and limiting the spread of disinformation.

APPENDIX

All Code of Practice on Disinformation reports for the platforms can be found at the Code of Practice Transparency Center [here](#). We analysed January 2023, June 2023 and March 2024 reports for all available platforms. Pinterest and Snap have never submitted Voluntary Code reports. X only submitted a partially completed report for January 2023.

All external links from the reports, such as advertising libraries and community standards were last checked in January 2024, as there were no obvious relevant changes to these based on the release of the March 2024 Strengthened Code reports.

Digital Services Act transparency reports provided in October 2023 by all platforms can be found via their respective EU transparency centres. At the time of writing these were live at the following links:

[Facebook](#)

[Instagram](#)

[LinkedIn](#)

[Pinterest](#)

[Snap](#)

[TikTok](#)

[X](#)

[Youtube](#)

CAAD recommendations to Very Large Online Platforms for tackling climate disinformation:

<https://caad.info/what-is-misinformation-disinformation/#policy-asks>

CAAD scorecard for the majority of Very Large Online Platforms' policies to tackle climate misinformation (2023): <https://caad.info/analysis/reports/climate-of-misinformation-ranking-big-tech/>