



# NO EMBARGO IN SIGHT

Meta Lets pro-Russia Propaganda  
Ads Flood the EU.

Paul Bouchaud, Marc Faddoul and Raziye Buse Çetin

# Executive Summary

**Political ads on Meta are left unchecked, allowing pro-Russian propaganda and financial scams to thrive in the EU.**

1. Meta systemically fails to enforce its own political ad policy:
  - The majority of political ads on Facebook and Instagram are not declared as such. Meta moderates less than 5% of those, even when the political nature is unambiguous. When moderation takes place, it is inconsistent half of the time. We also observe weaker enforcement on less broadly spoken languages as compared to English.
  - Meta's lack of investment in ads moderation means that the rules which political ads are subject to are not enforced, even as the EU Elections are approaching, and new regulation on political ads has been adopted.<sup>1</sup> This could cause a systemic risk to electoral processes as outlined in Digital Services Act (DSA) Article 34, and should be mitigated in accordance with the provisions of Article 35 of the DSA.
2. A large network is exploiting the lack of moderation to flood the platforms with financial scams and pro-Russian propaganda:
  - A large coordinated network of pages is flooding Meta's platforms (Facebook, Instagram, Messenger) with financial scams, with a campaign that reached at least 128 millions accounts in 10 EU countries in January-February 2024 alone.
  - Additionally, French and German audiences are targeted on Facebook with timely pro-Russian political ads. They weaponize news events, such as the farmers protests and military aid packages, to undermine support for Ukraine and institutional support in the EU. We detected more than 3800 such pages, which reached over 38 million accounts, between August 2023 and March 2024.

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<sup>1</sup> [EU introduces new rules on transparency and targeting of political advertising](#), *European Council*, 11 March 2024

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- Parts of this operation, known as *Doppelgänger*, had already been flagged by multiple CSO actors (EUDisinfoLab, CheckFirst, Reset, DFRLab). Meta acknowledged the operation and reported taking effective action against it. Our investigation shows that the network is still very active, with a reach 5 to 10 times bigger than had previously been observed.
- Despite claiming significant investments in safety and security,<sup>2</sup> our report shows that Meta failed to neutralize the campaign in a systematic way. The influence operation continues to thrive, despite that its consistent behavior would make it easy for Meta to take down.

Meta fails to implement adequate policies and systems to prevent the misuse of advertising systems to disseminate misleading information and foreign interference, going against EU guidelines<sup>3</sup> on the mitigation of systemic risks for electoral processes pursuant to the DSA.

As such, we recommend:

- For Meta to take immediate and durable action against the influence network described in this report, and to put in place effective moderation mechanisms of political ads which circulate on their platform to prevent similar exploits in the future.
- For the European Commission to launch an infringement proceeding against Meta under DSA Art.35, and to compel other VLOPs to duly implement their ad repository in line with the requirements of DSA Art.39, since previous reports did not lead to an effective mitigation of the risk.

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<sup>2</sup> [How Meta Is Planning for Elections in 2024](#), *Meta*, 28 November 2023

<sup>3</sup> [Guidelines for providers of VLOPs and VLOSEs on the mitigation of systemic risks for electoral processes](#), *European Commission*, 26 March 2024

## Disclaimer

This investigation was made possible by Meta's diligent implementation of a public ad repository mandated by the DSA Art.39. Equivalent tools deployed by other platforms, X, Snapchat or Bing in particular, have not made advertising data available to the same extent<sup>4</sup>.

Meta's provision of a functional and relatively comprehensive Ad library and API<sup>5</sup>, puts it on a higher transparency standard than its peers. This deserves an acknowledgement, and other platforms ought to be held accountable for failing to provide crucial data points required by the DSA in their ad repository, preventing public scrutiny efforts like this one.

## Credits

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<sup>4</sup> [Full Disclosure: Stress testing tech platforms ad repositories](#), CheckFirst, Mozilla - April 2024

<sup>5</sup> [Ad Library](#), Meta - 2023

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This report is based on the article [\*"On Meta's Political Ad Policy Enforcement: An analysis of Coordinated Campaigns & Pro-Russian Propaganda"\*](#), Bouchaud, 2024.

We refer the reader to <https://hal.science/hal-04541571> for further information about the methods and findings.

The links, press and further updates about this project are available on AI Forensics' website at: <https://aiforensics.org/work/meta-political-ads>

# Methods

## Dataset

We accessed the Meta Ad Library<sup>6</sup> containing, to date, over 240 millions ads, in particular *all* ads targeting EU countries, as mandated to VLOPs (Very Large Online Platforms) by the Article 39 of the DSA. We focused on ads that ran between Aug 17th 2023 and Feb 29th in the 16 European countries which had most ads published in the repository (both declared political ads and non-declared ads): *Austria, Belgium, Bulgaria, France, Germany, Greece, Hungary, Ireland, Italy, Netherlands, Poland, Portugal, Romania, Slovakia, Spain, Sweden.*

## Detection of political ads

To assess Meta’s political ads policy enforcement, we trained a language model to predict if an ad, based solely on its text, falls under Meta’s political ads guidelines. To constitute the training set we considered i) the examples<sup>7</sup> disclosed by Meta to potential advertisers ii) real ads being similar to those examples iii) ads containing the name of political figures, political parties, and political keywords such as “election”, “president” etc. iv) ads moderated by Meta as political v) non-political ads typically advertising commercial goods. We manually annotated over 3 thousands ads, balanced over 14 languages, to enforce Meta’s definition of “ads about social issues, elections or politics”.

We trained a language model on this dataset, and achieved a F1-score of .88 and an AUC of 0.95 over a 10% holdout dataset. Specifically, we fine-tuned *paraphrase-multilingual-MiniLM-L12-v2* through contrastive learning, followed by a logistic regression as a classification head.

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<sup>6</sup> [Ad Library](#), Meta - 2023

<sup>7</sup> [How ads about social issues, elections or politics are reviewed](#), Meta Business Help Center

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We used this model to detect over the set of 30 millions ads, launched in January-February 2024 in the 16 considered countries, those falling under Meta's political ads guidelines. Moreover, to assess the precision of Meta's enforcement, we manually annotated, for each 16 countries, a sample of 100 ads moderated by Meta and 100 ads declared as political by the advertisers.

Meta's definition of political ads being broad and blurry in some cases, we annotated edge-cases ads in favor of Meta decisions. Our results are then conservative estimates, in favor of Meta.

## Detection of coordinated campaigns

Having scored the entire set of ads instead of a limited random sample, allows us to explore the set of undeclared political ads. In particular, we focus in this work, on the detection of coordinated campaigns, understood as multiple advertisers running the same or highly similar ads content across multiple pages without disclosing the political nature of their campaign<sup>8</sup>. This detection is performed, adapting a method developed by [Viginum](#) to detect inauthentic content duplication on social media<sup>9</sup>. Specifically, we identify pairs of ads being semantically similar, allowing to detect, i) translation, if the ads are in different language ii) rewording, if they are in the same language iii) copy-pasta, near copy-paste, if they are close in terms of graphemes.

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<sup>8</sup> "A Security Analysis of the Facebook Ad Library" Edelson et al, 2020

<sup>9</sup> "Unmasking information manipulation: A quantitative approach to detecting Copy-pasta, Rewording, and Translation on Social Media" Richard et al, 2024

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# Moderation of political ads

## Meta's Political Ad Policy

On Meta's platforms such as Facebook and Instagram, political ads are subject to stricter rules than standard ads. For instance, according to Meta's Terms of Service revised<sup>10</sup> in 2018, advertisers can run political ads only to users in the country they reside in. Furthermore, all political ads should carry a noticeable "paid by" label.

Meta launched its Ad Library in 2018 and extended it to European Union member countries in May 2019. The Ad Library allowed access to the political ads<sup>11</sup> repository containing information such as the advertiser's identity, generated impressions and targeted audience. In accordance with the Digital Services Act's article 39 on online ad repositories, Meta extended the ad library to *all* ads targeting individuals within the EU in August 2023<sup>12</sup>.

Meta defines as political ads if:

- *Made by, on behalf of or about a candidate for public office, a political figure, a political party, a political action committee or advocates for the outcome of an election to public office; or*
- *About any election, referendum or ballot initiative, including "go out and vote" or election campaigns; or*
- *About social issues in any place where the ad is being published; or*
- *Regulated as political advertising.*

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<sup>10</sup> [Shining a Light on Ads With Political Content](#), Meta, 24 May 2018

<sup>11</sup> For the sake of brevity we'll designate "ads about social issues, elections or politics" as *political ads*.

<sup>12</sup> [New Features and Additional Transparency Measures as the Digital Services Act Comes Into Effect](#), Meta, 22 August 2023

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**Meta’s definition of social issues are particularly broad.** It is qualified as “sensitive topics that are heavily debated” that are prone to influence the outcome of existing and proposed legislations as well as election results.<sup>13</sup> In the European Union, Meta considers the following top-level social issues when reviewing ads: *Civil and Social Rights, Crime, Economy, Environmental politics, Health, Immigration, Political values and governance, Security and Foreign Policy.*

**Meta defers the responsibility to the advertiser to self-declare when their ad falls under Meta’s definition of social issues, elections and politics.** Although defining what is political is inherently challenging when it comes to precise labeling, Meta’s reliance on voluntary self-declaration presents a critical loophole for bad actors to evade scrutiny by omitting the political labels from their ads.

**Meta’s advertising ecosystem has consistently faced criticism and concern due to substantial gaps in transparency and accountability.** For instance, during the 2018 Brazilian elections, a significant number of political ads went undeclared as advertisers failed to categorize them as such<sup>14</sup>. Similarly, ads from the *Doppelgänger* pro-Russian disinformation campaign, identified by various civil society organizations ([EUDisinfoLab](#), [Reset](#), [DFRLab](#)) and [Viginum](#), France’s agency for combating foreign digital interference, also went undeclared as political<sup>15</sup>.

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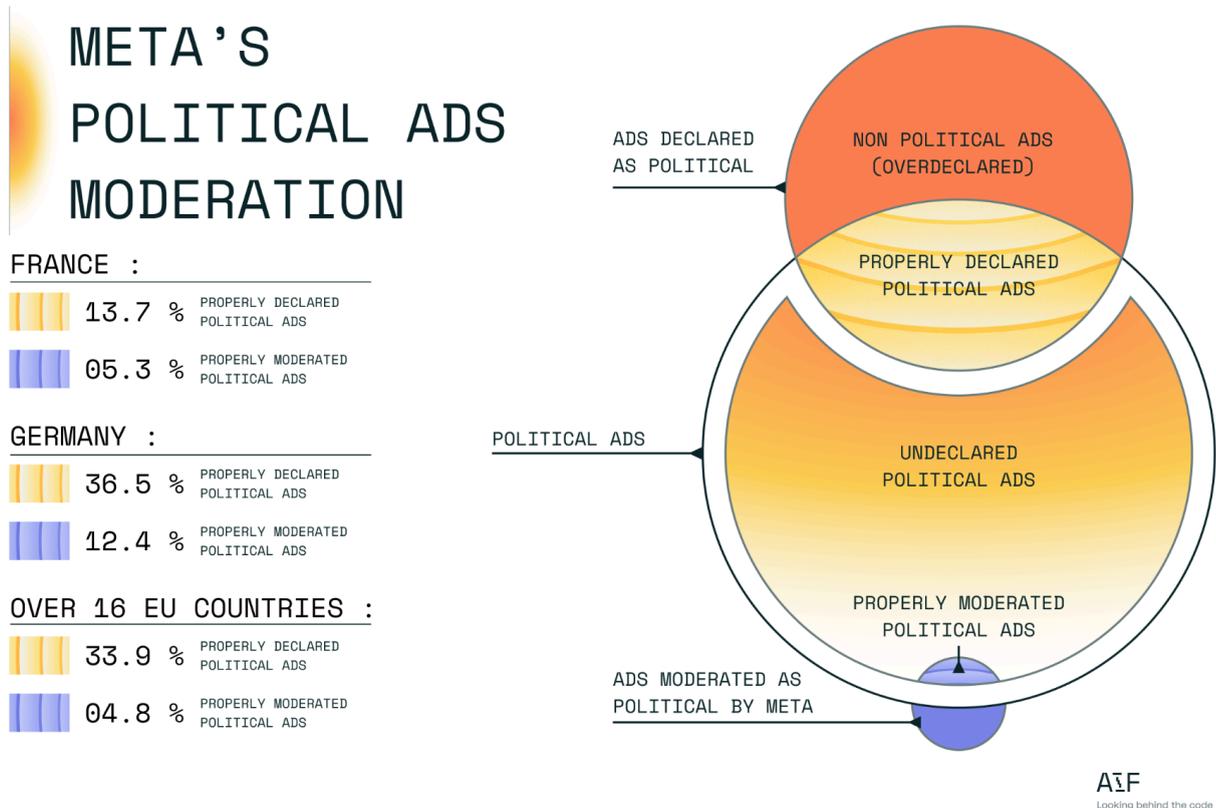
<sup>13</sup> [About Social Issues](#), Meta Business Help Center

<sup>14</sup> Facebook Ads Monitor: An Independent Auditing System for Political Ads on Facebook 2020, Silva et al

<sup>15</sup> [A complex and persistent information manipulation campaign](#), *Viginum*, 19 June 2023

## Policy Enforcement Evaluation

We find that Meta poorly enforces its policies for political advertisement:



- Most political ads published by Meta are not labeled as such. According to our conservative estimate, in the 16 EU countries considered in this study, **66% of political advertisements are not declared as such, among which less than 5% are moderated by Meta as political.** This moderation recall varies across countries, highlighting linguistic inequalities. Ireland, the only english-speaking country in our analysis, scored best, with 22.8% undeclared political ads moderated by Meta compared to 3.9% in Hungary.
- When moderation kicks in, it is most of the time inconsistent with the policy. Among undeclared ads that are moderated as political, we find that 60% don't actually seem to fall into Meta's guidelines. This might confuse advertisers and explain why their self-declarations are similarly inconsistent, with less

than half of the ads declared as political seeming to fall in the guidelines.

- Even explicitly political ads fall through moderation cracks. Many political ads can be trivially flagged, such as ads which name a head of State or those with words explicitly listed in Meta's guidelines. In France, only 16.3% of the 293 undeclared political ads in our dataset featuring the name of President Emmanuel Macron were moderated. We also note that when Meta accurately moderates an ad as political, it does not systematically extend the decision to duplicate versions of the same ad.



Niger 🇳🇬

Yesterday night, the Nigerien Prime Minister made it clear in a press conference that discussions were underway with the French authorities, so that the planning for the departure of the French occupation army based in Niger was finally finalized. a reality.

From Belgium where I am, I will never stop admiring the Nigerien people, the maturity of their leaders and especially its youth who, until now, have demonstrated rigor and professionalism so that nothing goes wrong.

France's behavior towards the demonstrators ultimately made it clear that in the face of strikes, France adopts a posture in Africa that it does not dare to adopt in France. And I consider this as a form of racism because it is unacceptable that the French government considers the demonstrations and demands of its citizens as legitimate and, conversely, describes as manipulated, by the Russians, the African youth who demonstrate freely and are dissatisfied with its African politics.

The words that Emmanuel Macron and his Minister of Foreign Affairs used during the conference of ambassadors and in the media are not only contempt, but an implication which suggests that France is master in Africa. So I will never stop saying it, French African policy is worse than a cancer for our continent. This policy must end immediately.



Let's stop for a long day to dream about our Unemployment Insurance together!

Our unions are currently negotiating a new Unemployment Insurance agreement with the MEDEF and its henchmen. Whatever the outcome, it is very likely that Macron and Borne will once again sit on the latter to further restrict the rights of the unemployed in the name of Saint-Plein-Emploi. Let's come together to think, look for solutions, debate proposals and together invent a new Unemployment...



SAT, OCT 14, 2023

Unemployment Insurance Day!

The Cruiser

Unemployment Insurance Day!

INTERESTED

*Examples of ads, translated in English, not declared as political, nor moderated as such by Meta, referring to French president Emmanuel Macron*

# Detection of influence operation

## Background and Novelty

As described in the methodology section, we build a network of ads, by linking those being identical, direct translation, near copy paste or reworded version. By identifying “connected components”, i.e. sets of ads linked to each other by one content duplication technique, we detected coordinated operations. The detected coordinated campaigns have unique characteristics in common with previously reported pro-Russian influence operations:

- **EU Disinfo Lab** first exposed in September 2022 an operation which they called *Doppelgänger*.<sup>16</sup> It impersonated authentic newspaper and media organizations by copying their design and hosting them on similar domains, to diffuse fake articles, videos and polls (80 ads). **DFRLab** also uncovered further activities from which appear to belong to the same network in February<sup>17</sup> and March<sup>18</sup> 2024. (563 ads detected between July 2023 - January 2024)
- **CheckFirst** exposed a large financial scam operation in June 2023, in their *Facebook Hustles* report.<sup>19</sup> As with *Doppelgänger*, counterfeit websites of renowned media organizations were distributed through Facebook ads, but to promote cryptocurrency scams programs rather than political narratives.

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<sup>16</sup> [DoppelGanger: Media Clones Serving Russian Propaganda](#), *EU Disinfo Lab*, 27 Septembre 2022

<sup>17</sup> [French prime minister faces onslaught of online attacks](#), *DFRLab*, 20 February 2024

<sup>18</sup> [Doppelganger targets Ukrainian and French audiences via Facebook ads](#), *DFRLab*, 12 March 2024

<sup>19</sup> [Facebook Hustles: The Hidden Mechanics of a Scam Machinery Impersonating News Organisations and Creators](#), *CheckFirst*, 22 June 2023

- **Viginum**, the French agency combating foreign digital interference, released in June 2023 an investigation into an information manipulation operation. Named *Reliable Recent News*<sup>20</sup>, it also used website impersonation and Facebook ads to diffuse pro-Russian narratives.
- **Reset** exposed a large network of inauthentic Facebook pages in October 2023<sup>21</sup>. In this investigation, hundreds of thousands of Facebook pages, mainly dormant, were identified as being assets of a coordinated pro-Russian influence network. The pages were detected based on the consistent naming schema they used to automatically generate the pages. Additionally, the report captured about 300 political ads propagated by the network.
- **Qurium**, a Swedish non-profit media foundation who also took part in the first Doppelgänger report, recently an anecdotal example<sup>22</sup> of scam ad using a deep fake of Nobel Prize Maria Ressa, and additional insights into the scammers infrastructure and methodology<sup>23</sup> in March 2024.
- **Meta** acknowledged the existence of the Doppelgänger operation in 2022, attributing it to two companies in Russia, later sanctioned by the EU<sup>24</sup>, founded by a former counselor to the Vice-President of the Duma. As of December 2022, Meta declared having received at least \$105,000 in spending for ads on Facebook and Instagram and to have taken down 703 pages<sup>25</sup>. In August 2023 Meta described Doppelgänger as "the largest and most aggressively persistent covert influence operation from Russia" and ensured their ongoing monitoring.<sup>26</sup>

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<sup>20</sup> [RRN : une campagne numérique de manipulation de l'information complexe et persistante](#), Viginum, 19 Juin 2023

<sup>21</sup> [Under the Radar : Vast Networks of Fake Accounts Raise Questions About Meta's Compliance with the EU's New Digital Rulebook](#), Reset, October 2023

<sup>22</sup> [Deep fake of Maria Ressa connected to Russian cyberscam network](#), Qurium, 4 March 2024

<sup>23</sup> [A journey into the Crypt of cloned media](#), Qurium, 26 March 2024

<sup>24</sup> [Information manipulation in Russia's war of aggression against Ukraine](#), European Council, 2023

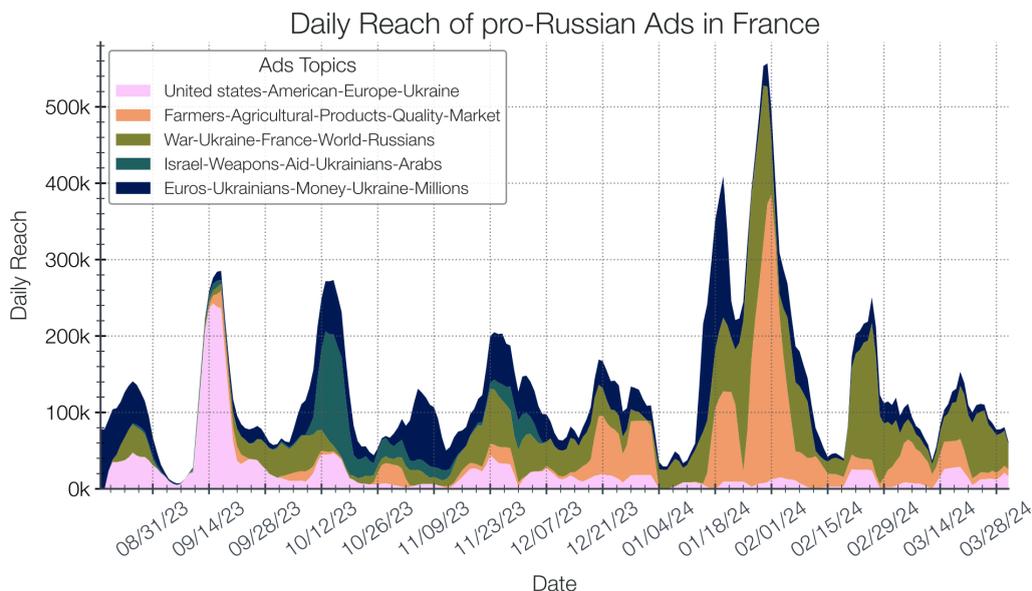
<sup>25</sup> [Meta's Adversarial Threat Report, Third Quarter 2022](#), Meta, November 2022

<sup>26</sup> [Adversarial Threat Report, Second Quarter 2023](#), Meta, August 2023

The reports described above extensively investigated the *modus operandi* of the operations, highlighting strong similarities between them in terms of the phishing domains and methodologies they use, the reliance on dormant and often single-use Facebook pages, common naming conventions and media styles, as well as their ties to Russia. These analyses leveraged expert-based search of the ad library, manual inspection of suspicious ads and pages, naming patterns of the pages, and analysis of the domain names to which the ads point to.

Instead, we systematically identify pages engaged in coordinated activity. This more generalizable approach could also be leveraged internally by Meta to neutralize it. Those previous investigations had only uncovered a fraction of their activities on Meta. Our analysis depicts that the scale and reach of these ongoing operations are **5 to 10 times bigger** than previously described. Despite Meta’s claim that the Doppelgänger operation has “*low-impact on the platform*”<sup>27</sup>, we uncovered its massive scale activity, over 3,826 ads reaching more than 38 million accounts<sup>28</sup> in France and Germany since August 2023.

Despite documented activity, we observed less than 0.1% of the cryptocurrency scam ads have been moderated, and less than 20% of ads from the pro-Russian propaganda influence operation. Even more concerning, we see no reduction of activity over time, as shown below by the reach of political ads targeting France over time:



<sup>27</sup> [Adversarial Threat Report](#), Meta, August 2023

<sup>28</sup> Sum of the reach of each ads, some accounts may have seen ads multiple times

## Pro-Russian Political Influence Operation

Between August 17th, 2023, and March 31st, 2024, pro-Russian ads reached, on average, every day, 138 590 accounts in France and 37 326 accounts in Germany. Beyond this baseline, peaks in reach coincide with significant geopolitical events.

**September 2023:** For instance, in the days following the announcement of a new aid package for Ukraine exceeding \$1 billion by the U.S. Secretary of State on September 6th, 2023, there was a notable increase in ads discussing the United States' involvement in the conflict. These ads compared the GDP of Europe and the U.S., suggesting that the U.S. instigated the conflict to bolster arms sales. Over a span of two days, September 8th-9th, 2023, reached 132 261 accounts in France. None of the 11 ads were moderated by Meta as political.

We display examples of such ads, translated in English (originally written either in French or German).

 **Ekirir online shop**  
Sponsored

The GDP gap between the United States and Europe is 80%!

I think it is clear, without further ado, who benefits from the conflict in Ukraine. Besides, if you remember history, the United States was the only one to emerge stronger from the Second World War, while Europe's economy was in decline.

Read in the article how the United States today makes money from war...  
[nutexpert.com](https://nutexpert.com)



Library ID: 1035559787471276

Inactive

Oct 9, 2023 - Oct 11, 2023

Platforms

EU transparency

See ad details

**Uheqeq online shop**  
Sponsored

Are we now responsible for the deaths of the Jews?

"We thank Ukraine for selling us these weapons, we will use them in the fight against the Jews, we will use them against Israel.

Video from Palestinian chats. Voice-over thanks Kiev for its support in the fight against Israel.

Do you now realize that our weapons will kill Jews?



**October 2023:** Promptly after the Hamas-led attack on October 7th and the subsequent resurgence of armed conflict in Gaza, a new narrative emerged accusing the Ukrainian President, referred to as the "Ukrainian comedian" of embezzling weapons from the Ukrainian army for personal gain. These weapons were alleged to have been used in attacks against Israelis. Such advertisements began circulating as early as October 9th, 2023, in both France and Germany. In total, propaganda ads mentioning Israel garnered a combined reach of 2,134,844 accounts in France (consisting of 222 ads with 47 unique texts) and 624,142 accounts in Germany (comprising 149 ads with 36 unique texts).

Notably, the proportion of ads mentioning 'Israel' being moderated was higher compared to the overall ad campaign, accounting for 23.0% in France and 36.9% in Germany. However, moderation occurred after these ads had already reached a significant number of accounts, totaling 385,514 in France and 142,431 in Germany. In addition to slandering the Ukrainian president, these ads advocated for disengagement of the United States in Ukraine in favor of supporting Israel.

**Clever Yoga Museum**  
Sponsored

Israel needs our help  
US allies doubt Washington's ability to help Israel and Ukraine at the same time. The American industrial sector is operating at full capacity to help the Ukrainians fight the Russians. But now American shells must fly not only on the Russians, but also on targets in Syria and Palestine.  
At the same time, Taiwan is also actively arming itself, increasing its orders for American weapons because a confrontation with China is predicted. America can't help everyone at once.  
Now that Israel is surrounded by enemies and must fight back, we cannot stand idly by! We must help the Israelis defend themselves! Otherwise, the conflict will drag on and the consequences will soon be felt.  
We will have hundreds of thousands of people from Arab countries on our doorstep, fleeing the rain of rockets, devastation and famine. So, either we help Israel now and put out this fire, or the same fires will break out in the streets of Paris and Tel Aviv! [codewtf.com](http://codewtf.com)



Israel needs our help

Learn more



Passionate Photography Salon  
Sponsored

Money is gone

The men in robes have forbidden the traffic light from using the money intended for the pandemic for green energy. In other words: The entire 60 billion euros have now literally evaporated.

The 100 billion euro project was also in danger. It was assumed that the traffic light would use the money to arm the Bundeswehr and at the same time to supply weapons to Ukraine.

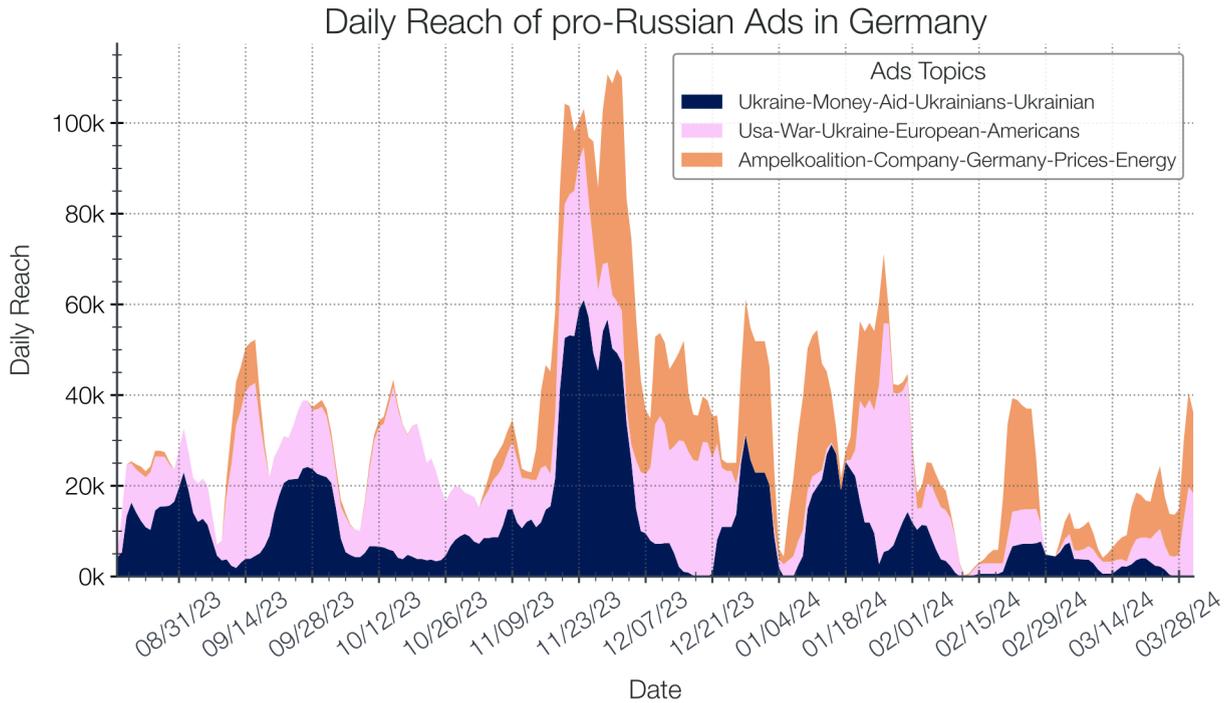
This decision is a disaster. We cannot survive without support from the energy sector, and neither can companies.

The traffic light has two options. Either you take money from other projects or increase the taxes. Both options are bad.

Essentially, we are flying into the abyss. Wave to those who sent us there: the traffic light and our partners from the USA. Finally, our problems began with the Ukraine war, which is considered the best American investment. And if only because they have overcome the crisis after the P and mie. And we are sinking faster and faster! Read more here: [acquiredbedlam.com](https://acquiredbedlam.com)



**November 2023:** On November 11th, 2023, the governing coalition led by German Chancellor Olaf Scholz agreed to double the country's military aid for Ukraine next year to 8 billion euros. Subsequently, on November 21st, 2023, the German defense minister announced a €1.3 billion weapons package during a visit to Kyiv. During this period, we observed a significant surge of 463 ads from the network targeting Germany. These ads, comprising 72 unique texts, criticized the German political coalition and voiced disapproval of Germany's support for Ukraine. The campaign ran from November 12th to November 30th, 2023, reaching a total of 1,676,220 accounts, an all time record, as displayed on the figure below:



**Beauteous gxr5**  
Sponsored

We will oppose Ukraine's accession to the European Union," declared Manon Aubry!

According to various studies, the cost of Ukrainian chickens and eggs is 75% lower than that of French chickens and eggs!

Importing these products means creating "unfair" competition for French farmers.

If we do not oppose Ukraine's accession to the European Union, we will ruin our farmers...

More information here [jamildentalcare.com](http://jamildentalcare.com)

**January 2024:** In France, we noted a peak in reach in January 2024, following the launch of the "Artillery for Ukraine" coalition between France and Ukraine, as well as a call from Members of the European Parliament for increased EU military aid. During this time, the network focused its efforts on French farmers, advocating against the integration of Ukraine into the European Union. The ads argued that such integration would create unfair competition for French farmers and were circulated during large French farmers' protests.

**March 2024:** Finally, less than two days following the attack on Crocus City Hall, advertisements relaying on the Kremlin's allegations of Ukrainian and Western involvement were launched. These ads reached 41,901 French accounts between March 24th and March 31st, 2024, none were moderated as political by Meta.

 **SabrinaRazumnova**  
Sponsored

What really happened in Russia?

Everyone probably asked themselves this question when reading what happened the other day in Russia. Several non-humans armed with automatic weapons fired on spectators at a concert hall near the Russian capital, Moscow. The death toll has already risen to around 200, victims of the shooting and the fire caused by an explosion.

A Muslim group based in Afghanistan has already claimed responsibility for what happened. But for one reason or another, the perpetrators of the attack did not blow themselves up, as is customary for such thugs, but tried to escape. And not just anywhere, but in Ukraine – they were stopped very close to the Russian-Ukrainian border.

It's no longer a secret: Ukraine is losing. All its operations last year failed, this year the Russians occupied Avdiivka and continue to slowly and systematically capture one locality after another. Ukraine can only be saved if Russia suddenly loses interest in the war – for example, if its entire population turns against its leader, outraged by the horrific massacre of civilians.

Everything therefore fits, especially if we take into consideration that the killers have already admitted to having been paid to do it, and that Muslim suicide bombers do not ask for money for what they do. And if Mr. 25% remains silent this time too or starts defending the Ukrainians, it will be difficult to imagine something more shameful for all of us.



## European Regulatory Framework on Political Advertising

The European Regulatory Framework for political advertising has both a set of regulations and initiatives for self-regulation.

A key legislative development is the recent adoption of the Regulation on the **Targeting and Transparency of Political Advertising (TTPA)** by the Council,<sup>29</sup> slated for enforcement in autumn 2025.

Complementing this, the **Digital Services Act (DSA)**, which became fully operative in November 2023, and the newly issued “**Guidelines on the Mitigation of Systemic Risks for Electoral Processes**”<sup>30</sup> lay a robust groundwork for enhancing transparency and accountability within this domain.

While the TTPA retains the onus on advertisers to classify ads as political, the DSA’s mandates platforms to recognize and mitigate systemic risks (Article 34) arising from their services, including those affecting civic discourse and electoral integrity. Additionally, Article 35 specifies the obligation of Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) to confront these risks directly. Article 39 further mandates the establishment of online advertising repositories, exemplified by Meta’s implementation.

In anticipation of forthcoming elections, the Commission released “Guidelines for Providers of Very Large Online Platforms and Very Large Online Search Engines on the Mitigation of Systemic Risks for Electoral Processes.” This initiative aims to support VLOPs and VLOSEs in adhering to Article 35 of the DSA, particularly concerning electoral process risks. The guidelines define political advertising as any activity aimed at the preparation, placement, promotion, publication, delivery, or dissemination of messages by or on behalf of political entities that seeks to influence voting behavior or electoral outcomes at various governance levels.

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<sup>29</sup> [EU introduces new rules on transparency and targeting of political advertising](#), *European Council*, 11 March 2024

<sup>30</sup> [Guidelines for providers of VLOPs and VLOSEs on the mitigation of systemic risks for electoral processes](#), *European Commission*, 26 March 2024

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The guidelines recommend that political ads are *labeled in a clear, salient and unambiguous manner*. VLOPs and VLOSEs are recommended to put adequate measures in place to *prevent the misuse of advertising systems to disseminate misleading information, disinformation and Foreign Information Manipulation and Influence (FIMI)* with regards to electoral processes, including deceptive generative AI content. Additionally, Meta is one of the signatories of the 2022 Code of Conduct on Disinformation committing “to prevent the misuse of advertising systems to disseminate misinformation or disinformation in Measure 2.3 the form of advertising messages”<sup>31</sup>.

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<sup>31</sup> [Signatories of the 2022 Strengthened Code of Practice on Disinformation](#), European Commission

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# Recommendations

As the EU Elections approach, we consider our findings to be very concerning. We make recommendations to Meta, other VLOPs, and to the European Commission to take immediate action on these findings.

## To the European Commission

### Launch an infringement proceeding against Meta under DSA art.35 for systemic risk to the integrity of elections

Despite its claims, Meta is not investing serious efforts ahead of elections in taking down what they call *Coordinated Inauthentic Behavior* to prevent foreign interference.<sup>32</sup> The operation described here had already been reported by multiple reports, and no systemic action has been taken since to stop it from operating.

The ease with which we were able to capture the full scope of the campaign, with just a fraction of the data which Meta has at its disposal internally, depicts a lack of effort from Meta to address the issue. What is worse, the platform continues to financially benefit from this influence operation, by selling advertising space.

We consider this to be a systemic failure, which can cause a risk to the integrity of the election, considering the societal and political nature of the targeted content.

### Enforce a stricter application of DSA Art.39 requiring platforms to provide sufficient metadata in their ad registry

We have been able to scrutinize the efficiency of Meta's moderation of political ads, as well as detecting the coordinated influence operation, thanks to the fact that Meta is providing a satisfactory ad repository. It contains metadata describing the content of the ads, as well as a thorough and functional API to access it.

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<sup>32</sup> [How Meta is planning for elections in 2024](#), *Meta*, November 2023

In this regard, Meta fulfills the requirements mandated by the article 39 of the DSA to a better standard than most other VLOPs.<sup>33</sup> Conversely, platforms as X do not make the content of the ads available in their public registry, despite this being explicitly required by the DSA. This makes external scrutiny of the kind presented here impossible, and appears to be in breach with the law.

## To Meta

### Take immediate and durable action to neutralize Doppelgänger

The influence operation described in this report is still active and prolific at the time of writing this report. It should be taken down promptly. Moreover, the new pages that might arise should be identified and moderated before their ads are published, within the Ads' review<sup>34</sup>. Those can be detected with simple heuristics which would be quite trivial to put in place, and AI Forensics can offer support to Meta if needed.

### Label political ads to enforce specific requirements

Most political ads published by Meta are not declared as such, evading the stricter targeting constraints and disclosure requirements which they should be subject to. Meta should implement a system to automatically flag political content, and trigger a human review below a certain confidence threshold. The seeming absence of automated detection upon the upload of an ad of whether it is political is curious in a company where such classification systems are known to be ubiquitous.<sup>35</sup> It is needed for Meta to effectively enforce its policies on political advertisement, as well as to implement the upcoming European regulation on the matter.<sup>36</sup>

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<sup>33</sup> [Full Disclosure: Stress testing tech platforms ad repositories](#), *CheckFirst, Mozilla* - April 2024

<sup>34</sup> [About ads in review](#), *Meta*

<sup>35</sup> [Our Progress Addressing Challenges and Innovating Responsibly](#), *Meta*, Sept 2021

<sup>36</sup> [EU introduces new rules on transparency and targeting of political advertising](#) - *European Council*, March 2024

# NO EMBARGO IN SIGHT

Meta Lets pro-Russia Propaganda  
Ads Flood the EU.

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