Charter for Climate Information Integrity in Advertising

Supporting the commitments of the Belém Declaration on Information Integrity on Climate Change

Supported by the Global Initiative for Information Integrity on Climate Change





Global Initiative for Information Integrity on Climate Change



Table of contents

Terminology 3

Introduction 6

Risks posed to climate information integrity by advertising 9

Principles for achieving climate information integrity in advertising 16

Policies and practices 20

1. Human rights safeguards for freedom of opinion and expression, as well as the right to privacy 20
2. Healthy incentives for information integrity on climate change 22
3. Transparency of digital advertising supply and value chains 24
4. Safeguarding against greenwashing in advertising practices 28
5. Accountability for harm to climate information integrity 31

Terminology

For the purposes of this Charter, the key terms below are used as follows:

Artificial intelligence (AI)

This paper discusses a range of AI technologies, including generative AI, AI recommender systems, agentic AI, large language models (LLMs), chatbots, etc.

Agentic AI

Agentic AI is an artificial intelligence system that can accomplish a specific goal with limited supervision.[1]

Generative AI

AI systems that can create new content, such as text, images, or music, without direct human input.[2]

AI surface

The portion of a screen where advertisements appear within or alongside AI generated content (e.g. chatbot responses, AI search summaries or AI-generated media).

Ad industry

A sector of organizations and companies creating and placing advertising or providing analysis of advertising. This includes advertising agencies, marketing departments within organizations, AdTech companies and trade bodies that seek to persuade the public to respond to products, services or causes.

Advertisers

Companies or individuals who purchase advertising, such as the marketing department of organizations or advertising firms. In this paper, this term excludes technology service providers, including AI companies and AdTech.

AdTech

The ecosystem of technology, tools and platforms that monetize online content.

---

[1] IBM, "What is agentic AI?", IBM Think. Available at: https://www.ibm.com/think/topics/agentic-ai.
[2] UN Innovation Network, "Generative AI".

Ad verification

Technology, including practices, software, tools and algorithms, which ensures ads appear on intended sites, reach targeted audiences and are viewed by real people.

Attention economy

An approach to the management of information that treats human attention as a scarce commodity. To address the scarcity of people's attention, technologies have been increasingly aimed at strategic capture of private attention aided by systematic collection and analysis of personal data, which has become a profitable business model.[3]

Brand safety

Practices and technology, including AI, that ensure advertising is placed in the appropriate context, with the intention to protect advertiser reputation.

Climate disinformation and misinformation

This refers to deceptive or misleading content that:

- Undermines the existence or impacts of climate change, the unequivocal human influence on climate change, and the need for corresponding urgent action according to the IPCC scientific consensus and in line with the goals of the Paris Climate Agreement;
- Misrepresents scientific data, including by omission or cherry-picking, in order to erode trust in climate science, climate-focused institutions, experts, and solutions; or
- Falsely publicises efforts as supportive of climate goals that in fact contribute to climate warming or contravene the scientific consensus on mitigation or adaptation.[4]

Media owners

A person or organisation, who owns any media business, for example publishers, website owners, digital platforms, cinema networks, television channel owners, newspaper proprietors, radio channel owners, owners of virtual and physical advertising space, and generally anyone who owns a medium in which advertising can be purchased.[5]

---

[3] United Nations Economist Network, *The Attention Economy* (United Nations, 2021). Available at: https://www.un.org/sites/un2.un.org/files/attention_economy_feb.pdf.
[4] Climate Action Against Disinformation, "What is climate disinformation?" (2022). Available at: https://caad.info/what-is-climate-disinformation/.
[5] Oxford University Press, "Media owner", definition (2026). Available at: https://www.oxfordreference.com/display/10.1093/oi/authority.20110803100146692.

Object-level transparency

Detailed data availability on specific ad placement and effectiveness, treating each placement as a discrete, auditable object. This level of transparency enables advertisers to reconcile ad spend directly to the posts, creators, accounts and channels that carried their ads, wherever this content is publicly available, including on personalised surfaces such as newsfeeds. It does not require disclosure of who saw the ad. In closed groups, private communications and individual interactions with AI systems, object-level transparency is provided through categorised and aggregated placement-level data, and never through user-level data.

Personal data

Any information relating to an identified or identifiable individual ("data subject"); "Data processing" means any operation or set of operations performed on personal data, such as the collection, storage, preservation, alteration, retrieval, disclosure, making available, erasure, or destruction of, or the carrying out of logical and/or arithmetical operations on such data.[6]

[6] Council of Europe, *Convention 108+: Convention for the Protection of Individuals with regard to the Processing of Personal Data* (2018). Available at: https://rm.coe.int/convention-108-convention-for-the-protection-of-individuals-with-regar/16808b36f1.

Introduction

The Charter for Climate Information Integrity in Advertising (the Charter) has been produced in response to multilateral calls to harness the power of advertising to support healthy information environments that uphold human rights and support access to accurate, evidence-based climate information. The Charter is a direct response to calls within the Global Climate Action Agenda COP30 outcomes report to advance corporate accountability by creating a Charter for Accountable Climate Advertising.[7]

The United Nations Global Principles for Information Integrity (UN Global Principles), launched by the UN Secretary-General in June 2024, explicitly recognize advertisers as key stakeholders with power to strengthen the information ecosystem.

At the 30th annual United Nations Climate Change Conference (COP30) held in Belém, Brazil in 2025, information integrity was acknowledged for the first time in a COP decision, as an essential element for climate action. Information integrity was also selected as one of the key objectives of that year's Action Agenda, aiming to engage multiple stakeholders in voluntary climate commitments.

Information integrity

Information integrity refers to an information ecosystem in which reliable and accurate information is available to all, enabling people to engage meaningfully in public life, make informed decisions and exercise their rights. This ecosystem is shaped by the actions of a diverse range of actors, including governments, technology companies, media, civil society and individuals.

Strengthening information integrity means protecting the right to freedom of expression and access to information, ensuring inclusive access to a range of information sources and enabling people to navigate information spaces safely, with privacy and freedom. It involves building resilient societies that foster trust, knowledge and public empowerment. Challenges to information integrity encompass a spectrum of risks, such as disinformation, hate speech, restrictions on press freedom and the malicious use of technologies.[8]

The Global Initiative for Information Integrity on Climate Change (GIIICC) – a multi-stakeholder coalition co-led by the Government of Brazil, the UN and UNESCO – launched the Belém Declaration on Information Integrity on Climate Change at COP30.

---

[7] *Global Climate Action Agenda at COP 30: Outcomes Report* (2025), p. 58. Available at: https://unfccc.int/sites/default/files/resource/COP30%20Action%20Agenda_Outcomes%20Report_December_2025.pdf.
[8] *Strengthening Information Integrity: From Principles to Practice*, Issue Brief 1 (United Nations publication, 2025), p. 5. Available at: https://www.un.org/sites/un2.un.org/files/un-information-integrity-issue-brief-01.pdf; *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis*, Issue Brief 2 (United Nations publication, 2026), pp. 6 and 21. Available at: https://www.un.org/sites/un2.un.org/files/un-information-integrity-issue-brief-02.pdf.

It was signed by 29 countries plus the EU.[9] In specific relation to the role of advertising, signatories to the Declaration commit to:

> Promote and support the sustainability of a diverse and resilient media ecosystem through adequate policies to enable and ensure accurate and reliable coverage, specially, within this context, on climate and environmental issues, as well as policies on advertising transparency and accountability.[10]

Signatories also call on the private sector to:

> Commit to the integrity of information on climate change in their business practices, in line with the United Nations Guiding Principles on Business and Human Rights;
>
> Ensure transparent, human rights-responsible advertising practices that bolster information integrity on climate change and support reliable information and journalism.[11]

Against this backdrop, the Charter for Climate Information Integrity in Advertising (the Charter) provides a delivery mechanism for the commitments made in the Declaration. For the purpose of the Charter, **advertising industry actors** include brands, advertisers, media and creative agencies, AdTech, artificial intelligence (AI) and generative AI companies, digital platforms, broadcasters, print and social media companies, data brokers, cloud computing services and other emerging technology actors.

The Charter describes the risks advertising poses to climate information integrity in the digital information ecosystem, and offers key principles to inform, interpret and implement policies and practices to mitigate those risks, across five interrelated areas of action:

1. **Human rights safeguards** for freedom of opinion and expression, as well as the right to privacy.
2. **Healthy incentives** for information integrity on climate change
3. **Transparency** of digital advertising supply and value chains
4. **Safeguarding** against greenwashing in advertising practices
5. **Accountability** for harm to climate information integrity

---

[9] The Declaration has been endorsed by Armenia, Austria, Australia, Belgium, Brazil, Canada, Chile, Czechia, Denmark, Estonia, Fiji, Finland, France, Germany, Ghana, Iceland, Luxembourg, Mauritius, Netherlands, Norway, Peru, Poland, Portugal, Seychelles, Slovenia, Spain, Sweden, Türkiye, Uruguay and the European Union.
[10] "Declaration on Information Integrity on Climate Change", COP30, Belém, 12 November 2025, para. 1 (b).
[11] "Declaration on Information Integrity on Climate Change", COP30, Belém, 12 November 2025, paras. 2 (a) and (b).

The Charter does not introduce new obligations; it distils existing obligations into practical measures for climate information integrity in advertising, in line with core international human rights treaties and instruments, including the United Nations Guiding Principles on Business and Human Rights (2011).

It is also aligned with the international treaty framework regulating response to global climate change, comprised of the 1994 United Nations Framework Convention on Climate Change (UNFCCC) that establishes the general principles and basic obligations of States in preventing dangerous interference with the world's climate, as translated into specific interrelated actions in the 2005 Kyoto Protocol thereto and the 2015 Paris agreement.[12]

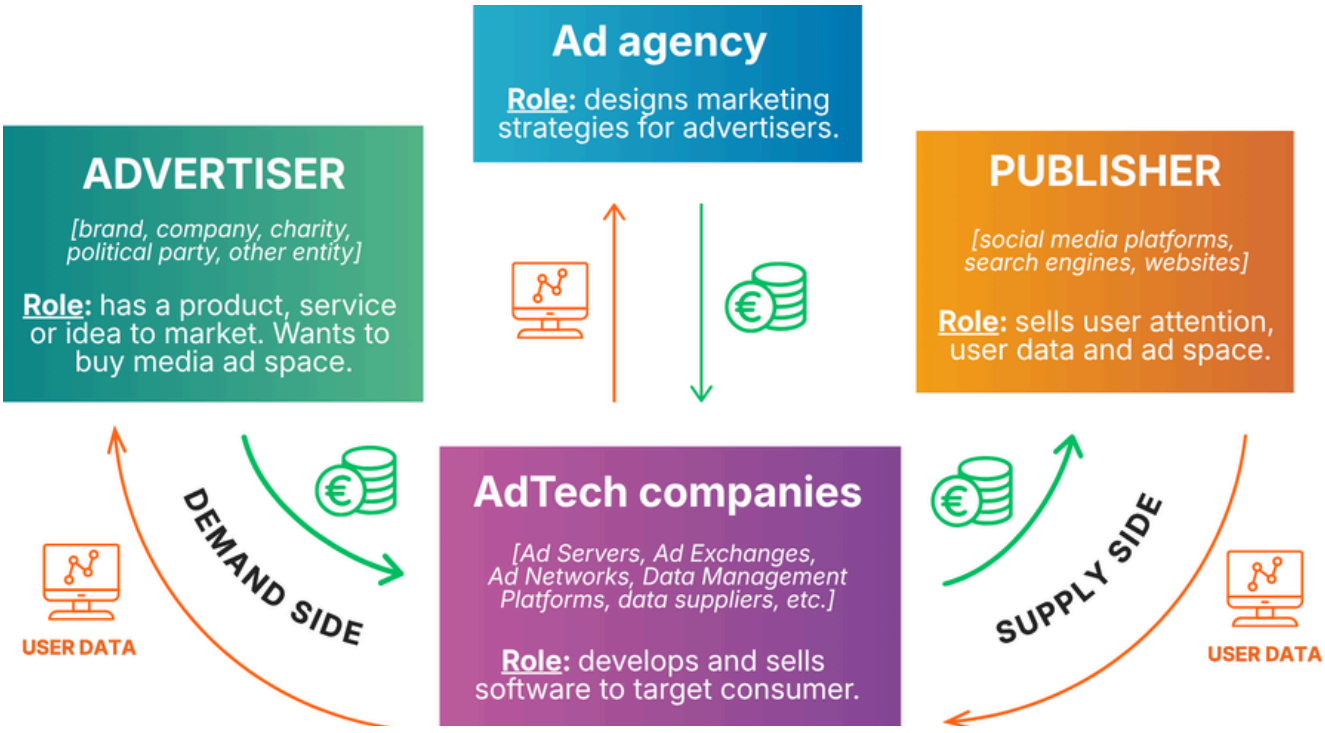
[12] United Nations Framework Convention on Climate Change, United Nations, *Treaty Series*, vol. 1771, No. 30822; Kyoto Protocol to the United Nations Framework Convention on Climate Change, United Nations, *Treaty Series*, vol. 2303, A-30822; Paris Agreement, United Nations, *Treaty Series*, vol. 3156, No. 54113.

Risks posed to climate information integrity by advertising

Digital platforms – like Facebook, TikTok, Instagram, YouTube and others, have a significant role in shaping how we interact with the world and each other. They have become part of our lives, allowing us to communicate, share stories, express ideas and opinions and creativity. Advertising is the dominant business model of this information ecosystem.

The digital advertising space and associated technologies, including Artificial Intelligence (AI), have also facilitated the spread of misinformation and disinformation, including on climate change and environmental issues. As the core revenue model of platforms used by billions of people to access news, as well as to connect and form their understanding of the world, digital advertising funds all kinds of content; from pluralistic media and high-quality entertainment, to hate speech and disinformation.[13]

How digital advertising works



The characteristics of the digital advertising supply chain functions are attention, scale and opacity. Advertising Technology (AdTech) and AI technologies harvest personal data to target content to people consuming online information in granular and opaque ways.[14]

---

[13] *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis*, Issue Brief 2 (United Nations publication, 2026), pp. 6–7.
[14] *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis,* Issue Brief 2 (United Nations publication, 2026), pp. 8-9.

When a brand purchases advertising, money passes through AdTech such as demand-side platforms, ad exchanges, supply-side platforms and verification services. Supply chain actors thereby profit directly from use of this personal data, before the advertisement reaches a single person. At each step of this process, fees are extracted and revenue is distributed to platforms and intermediaries, as well as content creators and publishers, to a lesser extent.[15]

The attention economy

The monetization of disinformation in the digital realm has proven enormously profitable for digital platforms, social media companies, AdTech companies, data brokers and generative AI companies. It has also come at a significant cost for advertisers, insurance companies, investors, consumers, people and the planet. The algorithms used by technology companies may steer online audiences towards false, misleading information and away from evidence-based information. By creating business models that monetize attention, big tech industry actors (including social media platforms, AdTech, AI and other emerging technology companies across the digital advertising supply chain) have amplified voices that promote harmful mis- and disinformation, made the production and dissemination of disinformation easier and faster and sidelined expert voices in online discourse.

This "attention economy" has been heavily leveraged by well-funded disinformation and hate campaigns to generate doubt and denial about climate change via tactics, techniques and technologies that are not transparent to advertisers, the people consuming information, or those impacted by it.

The shift of advertising to digital platforms and away from traditional print and broadcast media has reduced the financial viability of high-quality, free, independent, pluralistic and public interest journalism that is vital for information integrity on climate change.[16]

This trend is being exacerbated by the increasing use of generative AI for search and discovery, which bypasses publisher websites altogether. Many high-quality news outlets have not survived, threatening access to critical public interest information and the freedom to seek, receive and impart information along with it. Meanwhile, others leverage the way algorithms surface negative content to engage viewers and readers and promote climate disinformation.

Artificial intelligence in advertising

The information ecosystem is rapidly transforming at a rate that outpaces the ability of tools to accurately measure its carbon cost, and the cost of the proliferation of harmful content.[17]

---

[15] *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis*, Issue Brief 2 (United Nations publication, 2026), p. 16.
[16] Forum on Information and Democracy, *A Digital Tax to Support Quality Journalism: Applying the Polluter-Pays Principle to Big Tech Platforms* (2025), pp. 8–9. Available at: https://informationdemocracy.org/wp-content/uploads/2025/08/Policy-Brief-Digital-Taxes-for-Quality-Journalism.pdf;
Economist Impact, *Breaking News: The Economic Impact of Covid-19 on the Global News Media Industry* (2022). Available at: https://www.skeyesmedia.org/documents/bo_filemanager/Breaking-news_the-economic-impact-of-covid-19-on-the-global-news-media-industry.pdf.
[17] Ellie Hammonds, "The Media Leader investigation: AI push outpaces carbon transparency in advertising", *The Media Leader*, 10 March 2026. Available at: https://uk.themedialeader.com/the-media-leader-investigation-ai-push-outpaces-carbon-transparency-in-advertising/.

In addition to having significant environmental impact itself, AI is also being increasingly used to partially or even fully create ads using generative AI, to place ads using agentic AI, or next to AI-generated content, or to target people (through prediction of user behaviour).[18] Research has shown that generative AI does not always accurately report climate information, and may even spout climate disinformation and conspiracies, making the production of climate disinformation even easier than before, as well as diverting audiences, and therefore revenue, from reliable sources of information.[19]

Where AI and other tools are deployed without regard for information integrity, audience trust in advertising decreases, with detrimental impacts for businesses and the information ecosystem they operate in.[20] The Independent International Scientific Panel on Artificial Intelligence established by the General Assembly in 2025 pointed this out in its preliminary report:

> "*AI makes it easier to produce and target persuasive content at scale, including content designed to mislead, contributing to a gradual erosion of information integrity that can weaken the shared reality required for public trust, social cohesion and democratic deliberation.*" [21]

The first UN Global Risk Report (2024) similarly identified the spread of mis- and disinformation a top "global vulnerability." [22]

At the same time the escalating use of energy and water to build data centres for AI needs is exacerbating threats to information integrity in the carbon reporting supply chain. Fossil fuel use for the rapid expansion of these data centres is not always transparently reported.[23]

Commercial risk for advertisers

Brands are generally not willing participants in the decline in information integrity. Lack of transparency and accountability across the industry and the AdTech supply chain means they do not have the data they need to understand the effectiveness of digital advertising and to make informed decisions about where their ads are placed. For example, brands do not know which of their advertising provides a return on their investment, what content and creators they fund and what risks are associated with these practices, in monetary, planetary and human terms.

---

[18] *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis*, Issue Brief 2 (United Nations publication, 2026), p. 8.
[19] Global Witness, "AI chatbots share climate disinformation and recommend climate denialists to susceptible personas" (18 December 2025). Available at: https://globalwitness.org/en/campaigns/digital-threats/ai-chatbots-share-climate-disinformation-to-susceptible-users/.
[20] *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis*, Issue Brief 2 (United Nations publication, 2026), p. 7.
[21] *Preliminary Report of the Independent International Scientific Panel on AI: Evidence-based Assessment of Opportunities, Risks and Impacts of AI* (United Nations, July 2026), p. 9.
[22] *UN Global Risk Report 2024* (United Nations, 2024), p. 26; UNESCO, *Global Roadmap for Information as a Public Good in the Face of the Environmental Crisis* (2024), p. 10; *Governing AI for Humanity: Final Report* (United Nations publication, 2024), p. 29.
[23] Yale School of the Environment, "Data Centers, Urban Heat, and AI Growth" (10 July 2026). Available at: https://environment.yale.edu/news/article/data-centers-urban-heat-and-ai-growth.

Research shows that consumers feel unfavourably towards brands associated with misinformation,[24] whereas brands who appear on trusted news sites benefit from greater engagement and advertising effectiveness.[25] Placing advertising near mis- or disinformation or hate speech therefore does not make business sense for brands, yet the opacity of the AdTech system means that brands lack oversight of whether they are contributing to the monetization of mis- and disinformation, or how they might effectively monetize accurate information.[26] Even though advertisers have called for greater oversight,[27] advertising industry actors across the supply chain have so far failed to share the required data at scale.

Beyond the absence of data for advertisers to make informed decisions, digital platforms allow illegitimate advertisers - those who use advertising to spread scams and fraud and to sell illegal products and services - to run ads. These criminal actors, who may be operating as part of sophisticated, organized criminal organizations, are likely to disregard brand safety recommendations and may be willing to be associated with even the most harmful content.

Given the epidemic of scams and fraud - which in 2025, victimized one in seven consumers worldwide and generated estimated global losses of US$442 billion, with total annual losses exceeding US$1 trillion - the indirect financing of content by criminal advertisers must be treated seriously.[28]

This is not a marginal or anecdotal problem, but a structural feature of the current online advertising ecosystem. Malvertising - advertising used to deliver scams, phishing, and malicious redirects - increased 42% year-over-year in 2025, marking the largest surge recorded since 2019.

Consumer and business losses are estimated at over $12.5 billion in the United States alone.[29]

---

[24] Research by Integral Ad Science found in a survey of more than 1,150 adults that 73% of consumers agree or strongly agree that they would feel unfavourably to brands associated with misinformation and are likely to perceive a brand more positively if it denounces misinformation. Integral Ad Science, "New IAS Report Uncovers How Consumer Perception of Misleading Content Impacts Brand Favorability" (7 September 2022). Available at: https://integralads.com/news/misinformation-consumer-research/

[25] Research by Teads/Lumen found that brands appearing on traditional news sites boosted engagement by 35% and increased ad attention by 20%. Graham Alexander, "The value of traditional news", IAB UK, 28 October 2024. Available at: https://www.iabuk.com/member-content/value-traditional-news.

[26] Richard Kirk, "Brands could be spending three times too much on social. You read that right", *The Media Leader*, 10 September 2024. Available at: https://uk.themedialeader.com/brands-could-be-spending-three-times-too-much-on-social-you-read-that-right/; see Quadrature Climate Foundation, *Change the Narrative: Smart Climate Campaigning in an Adversarial Digital World* (2020).

[27] World Federation of Advertisers (WFA), *WFA Manifesto for Online Data Transparency* (2018). Available at: https://wfanet.org/knowledge/item/2018/04/20/WFA-Manifesto-for-Online-Data-Transparency;
World Federation of Advertisers (WFA), "Global brands call for clearer consensus on AI labelling as usage accelerates, WFA research" (2 April 2026). Available at: https://wfanet.org/knowledge/item/2026/04/02/global-brands-call-for-clearer-consensus-on-ai-labelling-as-usage-accelerates-wfa-research;
Andrew Buckman, "Why transparency is vital for brands and the advertising industry", IAB UK. Available at: https://www.iabuk.com/opinions/why-transparency-vital-brands-and-advertising-industry;
Association of National Advertisers (ANA), *2024 Programmatic Transparency Benchmark Study* (2024). Available at: https://www.ana.net/content/show/id/pr-2024-12-programmatic;
UK Department for Culture, Media and Sport, *Online Advertising Taskforce: Progress Report 2025* (17 March 2026). Available at: https://www.gov.uk/government/publications/online-advertising-taskforce-progress-report-2025.

[28] See Bitdefender, *Global Scam Intelligence Report 2026* (2026). Available at: https://blogapp.bitdefender.com/hotforsecurity/content/files/2026/06/global_scam_intelligence_2026.pdf.

[29] Sead Fadilpašić, "'Social advertising is being used to defraud at scale across some of the largest platforms.': Nearly one in three Meta ads reportedly point to a scam, phishing or malware", TechRadar, 24 February 2026. Available at: https://www.techradar.com/pro/security/social-advertising-is-being-used-to-defraud-at-scale-across-some-of-the-largest-platforms-nearly-one-in-three-meta-ads-reportedly-point-to-a-scam-phishing-or-malware.

Malvertising now drives 41% of all cyberattacks against individuals, making it the single largest threat to consumers according to telemetry from Gen Digital, functioning as a primary entry point into broader scam operations distributed across social media platforms. Leaked internal Meta documents further indicate that the company internally projected it would earn about 10% of its overall annual revenue - roughly $16 billion - from advertising for scams and banned goods, and that its platforms show users an estimated 15 billion "higher risk" scam advertisements every day.[30]

Privacy and freedom of expression

The personal data collection and use in targeted advertising is also undermining privacy rights.[31] Personal data, including peoples' location, financial transactions, and their online activity is routinely harvested from websites, apps and services that people rely on daily without giving them any meaningful control over how this data is used and shared. Once data is collected, data brokers, advertisers, apps and platforms exchange it among themselves to assemble detailed individual profiles that can reveal highly sensitive information. Data is also frequently combined with offline sources. These profiles are used both to target commercial and political advertising and to inform decisions affecting human rights, such as access to credit, insurance or welfare benefits.[32]

That data and ad targeting can also be bought by other actors to inform disinformation campaigns, or even to target individuals, including climate scientists, activists, and journalists. Privacy violations resulting from targeted advertising erode the health of the information ecosystem and expose citizens to risk and erode trust in the advertising industry.[33] Due to the level of opacity with which the industry operates, consumers lack meaningful information to understand what data is collected about them, how it is shared, and how they have been targeted in advertising campaigns, including those that may be harmful to them. As a result, they are unable to understand, contextualise, and critically assess the ads they see.

When the rights to personal data protection and privacy are abused through surveillance and the ways personal data is processed and harvested - freedom of information and expression is also compromised.[34] The right of everyone to hold opinions without interference and to express them is protected in international human rights law.[35] Freedom of expression entails the right to seek, receive and impart information and ideas, including those that are offensive or shocking. This right includes expression and receipt of all forms of communications of every form of idea and opinion capable of transmission to others, and may include commercial advertising.[36]

---

[30] Reuters, "Meta is earning a fortune on a deluge of fraudulent ads, internal documents show", *The Daily Star*, 6 November 2025. Available at: https://www.thedailystar.net/tech-startup/news/meta-earning-fortune-deluge-fraudulent-ads-internal-documents-show-4028761.
[31] Check My Ads Institute, "A New Future for Digital Advertising; Policy Solutions to Restore Adtech Integrity" (last updated 13 June 2025). Available at: https://checkmyads.org/policy/#tabbed-content-solutions--4
[32] See Privacy International, "Written evidence from Privacy International", submission to the UK Parliament's Joint Committee on Human Rights, No. RTP0025. Available at: https://committees.parliament.uk/writtenevidence/100839/html/.
[33] See Johanna Graf, Lukas Probst, Lena Steltzner and Leonie Wellmer, *The Potential of Contextual Advertising Compared with Tracking-based Personalised Advertising* (Germanwatch, August 2025). Available at: https://www.germanwatch.org/sites/default/files/2025-08/Germanwatch_Working%20Paper_Potential%20of%20Contextual%20Advertising_2025_1.pdf.
[34] Check My Ads Institute, "A New Future for Digital Advertising; Policy Solutions to Restore Adtech Integrity" (last updated 13 June 2025).
[35] International Covenant on Civil and Political Rights, United Nations, *Treaty Series*, vol. 999, No. 14668, art. 19.
[36] Human Rights Committee, general comment No. 34 (2011) on article 19: Freedoms of opinion and expression, United Nations document CCPR/C/GC/34, para. 11.

As with all forms of expression, those manifested through commercial advertising can be subject to certain restrictions, but only where such restrictions are provided by law and are necessary for respect of the rights or reputations of others; or for the protection of national security, or public order (*ordre public*) or of public health or morals.[37] Such situations may arise for instance, where environmental and climate change issues are considered from a public health perspective.

Climate mis- and disinformation have contributed to attacks against emergency responders, journalists, scientists, health professionals, activists and others who engage on climate and environmental issues.[38] Such attacks have a chilling effect on journalistic freedom and the rights of others to access information. These risks and their consequences tend to be exacerbated during natural disasters and extreme weather events. For this reason, expressions that incite violence can be limited on grounds specified in international law including to protect the human rights of others, in ways that can have implications for advertisers whose service providers monetize the spread of environmental and climate mis- or disinformation in ways that threaten human rights, erode public trust and expose brands to reputational and legal risks.

Advertised emissions

Transparency is also critical in determining the climate impacts of emissions owing to increased consumption driven by advertising. The concept of 'Advertised Emissions', understood as the greenhouse gas emissions that result from the uplift in sales generated by advertising, captures this idea. An advertiser that measures and reduces its Advertised Emissions can complement action on its operational emissions, to take climate action in ways that genuinely reduce carbon emissions overall.

Greenwashing

UN Secretary General António Guterres has called for zero tolerance of net-zero greenwashing and false pledges that mask continued fossil fuel expansion.[39] The advertising industry is a key participant in such practices, both through its contribution to the erosion of information integrity and more directly through advertising messaging that is false or misleading.[40]

Transparency and accountability are needed for advertising industry actors participating in and profiting from greenwashing, in order to create a level playing field for those organisations who want to incentivise demand for genuine lower-carbon choices. Ending greenwashing presents an opportunity for advertisers to become part of the solution - by incentivising choices that drive genuinely sustainable consumption. Deficiencies in environmental and digital literacy compound these challenges, meaning that many people are unable to critically assess the veracity of the

---

[37] International Covenant on Civil and Political Rights, United Nations, *Treaty Series*, vol. 999, No. 14668, art. 19 (3).
[38] See, inter alia, UNESCO, *Press and Planet in Danger: Safety of Environmental Journalists – Trends, Challenges and Recommendations* (2024); Global Witness, *Roots of Resistance: Documenting the Global Struggles of Defenders Protecting Land and Environmental Rights* (September 2025); Asia Centre, *Climate Disinformation in the Philippines: Legitimising Attacks on Indigenous Peoples* (2026); American Federation of Government Employees (AFGE), "AFGE Condemns Misinformation, Threats against FEMA Employees Helping with Hurricane Efforts" (21 October 2024).
[39] United Nations, "COP27: 'Zero tolerance for greenwashing', Guterres says as new report cracks down on empty net-zero pledges", UN News, 8 November 2022. Available at: https://news.un.org/en/story/2022/11/1130317.
[40] Greenwashing is defined as: misleading the public to believe that a company or entity is doing more to protect the environment than it is.

information delivered to them, or the interests of those profiting from it. Lack of public understanding about human rights also allows public and private actors to successfully hijack the language of freedom of expression to stifle public discourse on the one hand, while defending speech that causes human rights harms on the other.

The limits of self-regulation

This Charter has described in depth the limits of advertising self-regulation. Accountability to both individuals whose rights are impacted and for the damage done to information integrity is currently severely lacking. UNESCO advocates for a comprehensive governance system, where self-regulation is combined with co-regulation and statutory regulation.[41]

More broadly, businesses have largely been trusted to self-regulate their responsibilities, in the 1992 Rio Earth Summit Agenda 21 Action Plan, the 2000 UN Global Compact and the 2015 Paris Climate Change Agreement to the 1992 UN Framework Convention on Climate Change (UNFCCC). However, self-regulation has proven largely ineffective.[42] The first global stocktake of the Paris agreement in 2021 to 2023 found implementation to be "lacking across all areas." [43] It pointed to the voluntary nature of several initiatives and the need to increase private sector accountability.[44]

While self-regulation has so far failed to mitigate risks posed to climate information integrity, mandatory approaches through legal and policy frameworks often fail to keep pace with modern advertising systems, even in well-resourced States. Private sector actors may strive to comply with domestic laws while also aligning their operations with international human rights norms, particularly in contexts where State-based protections are deficient.[45] Yet some multinational companies – who wield immense power – deliberately opt to operate in countries whose governance systems are not aligned with international human rights law and standards, in order to avoid accountability. Further accountability challenges arise from the fact that advertising industry actors may be domiciled in one jurisdiction but cause harms in others.

These interrelated challenges to climate information integrity speak to the need for interrelated responses by both public and private actors and by national states and international organizations. In many countries, governments are among the biggest funders of the advertisement industry, and should review their policies, aligning them with this Charter. The Charter therefore offers actions for governments, businesses and advertisers to take towards fulfilling their critical roles to play in achieving climate and environmental information integrity.

---

[41] See UNESCO, *Guidelines for the Governance of Digital Platforms: Safeguarding Freedom of Expression and Access to Information through a Multistakeholder Approach* (2023). Available at: https://unesdoc.unesco.org/ark:/48223/pf0000387339.
[42] Forum on Information and Democracy, *Ads for News, News for Ads: The Role of Government in Reforming the Digital Advertising Market* (March 2026), pp. 16–17. Available at: https://informationdemocracy.org/publications/ads-for-news-news-for-ads%EF%BD%9Cthe-role-of-government-in-reforming-the-digital-advertising-market/.
[43] United Nations Framework Convention on Climate Change (UNFCCC), "Frequently Asked Questions About the Global Stocktake". Available at: https://unfccc.int/topics/global-stocktake/about-the-global-stocktake/frequently-asked-questions-about-the-global-stocktake; "Technical dialogue of the first global stocktake: Synthesis report by the co-facilitators on the technical dialogue", United Nations document FCCC/SB/2023/9 (8 September 2023), para. 196.
[44] "Technical dialogue of the first global stocktake: Synthesis report by the co-facilitators on the technical dialogue", United Nations document FCCC/SB/2023/9 (8 September 2023), para. 196.
[45] *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (United Nations publication, 2011), Guiding Principle 23. Available at: https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

Principles for achieving climate information integrity in advertising

The following principles are offered to support interpretation and implementation of the Charter.

States' human rights obligations in advertising

States have duties to prevent third parties domiciled in their territory – including advertising industry actors – from negatively interfering with human rights. Operational principles in fulfillment of these duties include enacting and enforcing laws requiring businesses to respect human rights and supporting them to do so through human rights due diligence – and by requiring or encouraging them to communicate how they address their human rights impacts.[46] States must also ensure that when human rights abuses occur, those affected have access to an effective remedy.[47]

As part of their obligation to realize human rights, States must take proactive actions to create an environment in which rights can be exercised, in the form of a pluralistic, independent and sustainable information environment.[48] In encouraging independent and diverse media, States should take into account the extent to which developments in information and communication technologies have substantially changed the way that ideas and opinions are exchanged and take necessary steps to foster independence of and access to these new media, including to enable access to climate and environmental information.[49]

Legality, necessity and proportionality

Any measures States take in respect of information integrity in advertising must respect freedom of information. States must refrain from imposing restrictions that amount to censorship or that arbitrarily or disproportionately limit freedom of expression.[50] Because freedom of expression carries special duties and responsibilities, it is not an absolute right. Article 19(3) of the International Covenant on Civil and Political Rights permits restrictions to it where limitations are provided by law, pursue a legitimate aim (such as the protection of the rights of others) and are necessary and proportionate to that aim.

Any restrictions on advertising industry actors, including through measures to strengthen transparency and accountability, must align with this tripartite test. Proportionality means that the least restrictive measures be used to achieve the aim, and that safeguards be put in place to ensure that measures cannot be used as a pretext for suppressing protected expression including dissent and unorthodox views, including about climate change and the environment.

---

[46] *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (United Nations publication, 2011), Guiding Principle 3.
[47] *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (United Nations publication, 2011), Guiding Principles 25–31.
[48] *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (United Nations publication, 2011), Guiding Principles 1 and 2.
[49] Human Rights Committee, general comment No. 34 (2011) on article 19: Freedoms of opinion and expression, United Nations document CCPR/C/GC/34, para. 15.
[50] Inter-American Court of Human Rights, *Climate Emergency and Human Rights*, Advisory Opinion AO-32/25 of 29 May 2025, requested by the Republic of Chile and the Republic of Colombia, paras. 500 and 526–527.

The right to privacy

When enacting laws to further transparency in the advertising industry, states and companies must refrain from enacting policies that further undermine people's right to privacy. International human rights mechanisms have been clear that the unauthorized processing of personal data infringes on the right to privacy and have emphasized the importance of data protection laws in enforcing that basic right.[51] For data protection laws to be effective, they must apply comprehensively and be enforced by an independent, adequately resourced regulator.

Transparency without surveillance

Transparency in the advertising supply chain and the right to privacy reinforce each other: the same opaque data flows that allow disinformation to be monetized can also enable surveillance. Transparency measures should therefore follow the money and the content, not the people. To ensure that the measures called for in this Charter cannot become a new route for collecting or sharing personal data, data collected in line with the transparency asks in this Charter must not be used for targeting, audience profiling or measurement of individuals, combined with other datasets, or sold or shared onwards.

Where advertising appears alongside publicly available content, including on personalised surfaces such as newsfeeds, that content may be identified at object level, provided the disclosure is separated from the identity, behaviour and viewing sequence of the person who saw the ad. In closed groups, private communications and individual interactions with AI systems, data should be limited to categorised and aggregated placement-level data. In all cases, minimum thresholds should apply so that individuals or small groups cannot be re-identified.

Human rights responsibilities in advertising

Advertising industry actors have human rights responsibilities.[52] The same responsibilities are owed by digital supply chain actors whose activities shape the global information environment. Like all private sector actors, those in the advertising industry should align their policies and practices with international human rights law.[53]

The UN Global Compact (2000) supports commitment to transparent, human rights-responsible advertising practices to bolster information integrity on climate change and to support reliable information on journalism. Designed in line with the 2030 Agenda for Sustainable Development, the UN Global Compact sets out that businesses should support a precautionary approach to environmental challenges (Principle 7), undertake initiatives to promote greater environmental responsibility (Principle 8), and encourage the development and diffusion of environmentally friendly technologies (Principle 9).

The UN Guiding Principles on Business and Human Rights (2011) is a reference point for corporate human rights responsibilities in business operations, including acting to avoid causing

---

[51] See United Nations High Commissioner for Human Rights, *The right to privacy in the digital age*, United Nations document A/HRC/39/29 (3 August 2018). Available at: http://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/39/29.
[52] Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, "Threats to freedom of expression online in turbulent times", United Nations document A/80/341 (18 August 2025), para. 99.
[53] Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, "Threats to freedom of expression online in turbulent times", United Nations document A/80/341 (18 August 2025), para. 99.

or contributing to adverse human rights impacts and addressing such impacts when they occur, and seeking to prevent or mitigate impacts directly linked to their operations, products or services by their business relationships, even if they have not contributed to them.[54] To fulfill these responsibilities, business enterprises should embed publicly available human rights policies throughout their operations, and put human rights due diligence processes in place to prevent, mitigate and remediate any human rights impacts.[55] The way that responsibility is attributed to people in companies determines the extent to which they are legally accountable for any human rights harms that the company causes.[56]

UNESCO's Guidelines for the Governance of Digital Platforms (2023) offer guidance on safeguarding the right to freedom of expression including access to information and other human rights in digital platform governance, including the right to privacy, while dealing with content that can be permissibly restricted under international human rights law and standards. Principle 5 calls on platforms to establish reporting and complaints mechanisms, in line with the principles outlined in the UN Guiding Principles on Business and Human Rights for effective complaints mechanisms: legitimacy, accessibility, predictability, equitability, transparency, rights-compatibility and continuous learning.[57]

The UN Global Digital Compact (2024) also calls on digital technology companies and social media platforms to strengthen accountability of their systems.[58] The Belém Declaration on Information Integrity on Climate Change (2025) affirms commitment to advertising accountability.[59]
It calls on the private sector to commit to information integrity in climate change in their business practices, in line with the UN Guiding Principles on Business and Human Rights (2011).

Transparency and integrity in advertising

The UNESCO Guidelines for the Governance of Digital Platforms (2023) call for meaningful transparency, on advertising practices of digital platforms, the advertisers who advertise on these platforms, and the ad libraries which allow for scrutiny of this by governments and researchers. In calling digital platforms to report to the public and to governance systems and regulators, "the information provided should be as clear and concise as possible, and as detailed and complex as necessary. Transparency is not simply the provision of legal texts or a data dump, but about providing stakeholders with the information they need to make informed decisions." [60]

The UN Global Digital Compact (2024) calls on digital technology companies and social media platforms to enhance transparency of their systems; to provide researchers with access to data to build an evidence base on how to address misinformation and disinformation; and to publicly communicate their actions to counter-potential harms.[61]

---

[54] *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (United Nations publication, 2011), Guiding Principle 13.
[55] *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (United Nations publication, 2011), Guiding Principles 15-22.
[56] *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (United Nations publication, 2011), p. 29.
[57] UNESCO, *Guidelines for the Governance of Digital Platforms: Safeguarding Freedom of Expression and Access to Information through a Multistakeholder Approach* (2023), Principle 5.
[58] "Global Digital Compact", annex I to General Assembly resolution 79/1 (2024), para. 36.
[59] "Declaration on Information Integrity on Climate Change", COP30, Belém, 12 November 2025, para. 1 (b).
[60] UNESCO, *Guidelines for the Governance of Digital Platforms: Safeguarding Freedom of Expression and Access to Information through a Multistakeholder Approach* (2023), Principle 3 ("Platforms are transparent"), para. 112.
[61] "Global Digital Compact", annex I to General Assembly resolution 79/1 (2024), para. 36.

Unlike these other guidelines, the UN Global Principles for Information Integrity (2024) offer recommendations for advertisers and AdTech companies specifically, including similar transparency and research principles, calling on advertisers to require advertising industry actors to adopt transparency standards that enable end-to-end validation of the supply chain and to share full advertising campaign data with clients and researchers, while respecting user privacy.

By being transparent about how their advertising processes work, AdTech and AI companies strengthen identification and mitigation of human rights risks. Brands and businesses that are committed to their own human rights responsibilities should demand that the companies they pay for advertising services do likewise.[62] As technology advances, the role of advertisers to call for safeguards and transparency about how technologies work, what data is collected and what sources are used or excluded is critical for information integrity.[63]

States should tackle the industry of fraud, scams and the sale of illicit products and services by demanding greater rigor and diligence from advertising industry actors including AdTech, artificial intelligence (AI) and generative AI companies, digital platforms, broadcasters, print and social media companies in selling inventory on the demand side. In addition, they should investigate and hold accountable those who exploit conspiracy theories, including on climate change, to extort and defraud good-faith citizens, including through the placement of ads or the boosting of content on social media.

Public awareness, education and participation

Principle 10 of the Rio Declaration on Environment and Development of 1992 recognizes that environmental issues are best handled through public participation. Article 6 of the United Nations Framework Convention on Climate Change calls Parties to promote education, training and public awareness, including through public access to information on climate change. Article 12 of the 2015 Paris Climate Change Agreement calls parties to cooperate in measures to enhance climate change education, training, public awareness, public participation and public access to information. Given that information is now transmitted and consumed in the digital information ecosystem as well as through traditional media, public participation must also be protected and promoted in digital spaces.

[62] *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis*, Issue Brief 2 (United Nations publication, 2026), p. 16.
[63] *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis*, Issue Brief 2 (United Nations publication, 2026), p. 7.

Policies and practices

1. Human rights safeguards for freedom of opinion and expression, as well as the right to privacy

Goal/vision: Measures are in place to achieve transparency and accountability in the digital information ecosystem, safeguard against interference with freedom of opinion and expression and promote free, independent and evidence-based climate and environmental information.

Policy priorities

1. Measures to increase transparency and accountability in the advertising sector are human rights-responsible and only allow interference with freedom of opinion or expression that are prescribed by law, serve a legitimate purpose (including national security, public safety, public order, public health or the rights and reputations of others) and are necessary and proportionate to that aim.

2. The digital advertising industry is designed to mitigate human rights risks, including to freedom of opinion and expression, by supporting an information system that fosters free, independent and evidence-based climate and environment information.

Practice

For State actors:

1. Leverage multi-stakeholder partnerships, including states, researchers, regulators and civil society, to conduct holistic risk monitoring and information sharing on how personal data is used in the advertising supply chain and how risks to climate and environmental information integrity are addressed while protecting human rights to privacy and freedom of expression, including access to information.

2. Enact and amend laws and policies, in line with international human rights law, to protect academics, environmental journalists, health professionals, activists, human rights defenders, civil society actors and other stakeholders to carry out their work free from fear and harassment.

3. Enact or amend data protection laws and policies in line with international human rights law requiring all advertising industry actors (including AdTech and AI companies and data brokers) to publicly disclose the sources, inferences and recipients of the personal data they process, enforced by an independent and sufficiently resourced regulator.

4. Collaborate with advertising businesses, AdTech and AI companies, social media platforms, the media, other private sector actors and civil society, to strengthen environmental, digital and human rights literacy through education systems, public awareness and media campaigns to empower public and private actors and online consumers to understand their online rights, to critically assess information and

identify manipulative advertising practices in the digital information ecosystem including through the use of AI and AdTech to use personal data and spread information.

5 Enact or amend laws and policies in line with international human rights law, to protect independent, free and pluralistic media as vital sources of information on matters of public interest.

6 Identify and assess how advertising business models can exacerbate risks to freedom of expression including access to information, during climate-related emergencies and crisis situations, such as natural disasters and extreme weather events, and put mitigation strategies in place to safeguard information integrity in such crises, in line with international human rights law.

7 Promote policies to curb the use of digital advertising for the dissemination of fraud and scams, and the sale of illegal or harmful products and services that interfere with people's human rights.

For advertisers:

8 Collaborate across industry and with civil society to share consistently good practices and lessons learnt about information integrity in a timely manner, and to assess the impacts of advertising and systematic mitigation of risks and potential harms stemming from Generative AI, advertising and content monetization.[64]

9 Proactively identify and mitigate human rights risks, publish risk assessments and findings publicly, and directly engage with human rights stakeholders to strengthen the collective evidence-base for environmental and climate impacts of advertising.

10 Establish independent oversight mechanisms to review measures to increase transparency and accountability of digital advertising industry practices, to ensure they are proportionate to a legitimate aim, prescribed in law and necessary, to guard against their misuse to suppress free expression.

11 Put safeguards in place in line with the human right to freedom of expression, including access to information, to ensure privacy-preserving data access for a diverse range of researchers to strengthen collective multi-stakeholder action to fill research gaps and inequalities around environmental information integrity.

12 Require advertising service providers to identify, assess and disclose how their business models exacerbate risks to freedom of expression including access to information during climate-related emergencies and crisis situations, such as natural disasters and extreme weather events, and put risk mitigation strategies in place to uphold information integrity.

---

[64] *United Nations Global Principles for Information Integrity: Recommendations for Multi-Stakeholder Action* (United Nations publication, 2024), p. 27. Available at: https://www.un.org/sites/un2.un.org/files/un-global-principles-for-information-integrity-en.pdf.

2. Healthy incentives for information integrity on climate change

Goal/vision: The digital advertising ecosystem uses ad placement strategies that are transparent, accountable and human-rights responsible in ways that strengthen information integrity on climate and environmental issues.

Policy priorities

1. Ensure there is transparency across the advertising supply chain about what content and creators are being monetized publicly and by whom, so that State and civil society actors can develop evidence-based policies, and so that brands and advertisers have meaningful informed choices to not monetize climate and environmental mis- and disinformation, with full respect to user privacy.

2. Incentivize and empower brands and advertisers to direct their advertising spend away from climate mis- and disinformation, towards public-interest journalism and credible, evidence-based environmental information.[65]

Practice

For State actors:

1. Implement measures to ensure that any government stakeholder engagement of advertisers does not use taxpayer funding to fund mis- or disinformation including on climate change and environmental issues or fund intermediaries that are not working to avoid monetization of mis- or disinformation.

2. Consult with brands, media outlets, advertising industry actors and other relevant stakeholders that demonstrate willingness to support human rights-responsible information integrity safeguards and standards, to identify opportunities to commercially *incentivize* media owners and generative AI tools to support information integrity on climate change.

3. Engage and consult with partners to design and implement measures to establish transparency across the advertising supply chain so that advertisers can make informed choices to not contribute to climate mis- and disinformation, including by introducing client disclosure requirements as well as requirements to disclose advertised emissions.[66]

4. Engage with partners to design and implement measures to incentivize advertising industry actors to direct their advertising spend in support of public interest information on climate and environmental issues by promoting the use of advertising metrics that measure brand safety and risk, and impact on human rights and information integrity.

---

[65] Forum on Information and Democracy, *Strengthening Information Integrity on Climate Change and the Environment* (February 2026), p. 41. Available at: https://informationdemocracy.org/wp-content/uploads/2026/02/Report-FID-%E2%80%93-Strengthening-Information-Integrity-on-Climate-Change-and-Environmental-Issues-.pdf

[66] Selwin Hart, Special Adviser to the Secretary-General on Climate Action and Just Transition, in *The Five Levers for Change: A Blueprint to Phase Out Fossil Fuel Advertising* (ACT Climate Labs, 2025), p. 2.

5 Review regulation and work with the digital advertising supply chain to curb ads and promotion of fraud, scams and of illegal or irregular products.

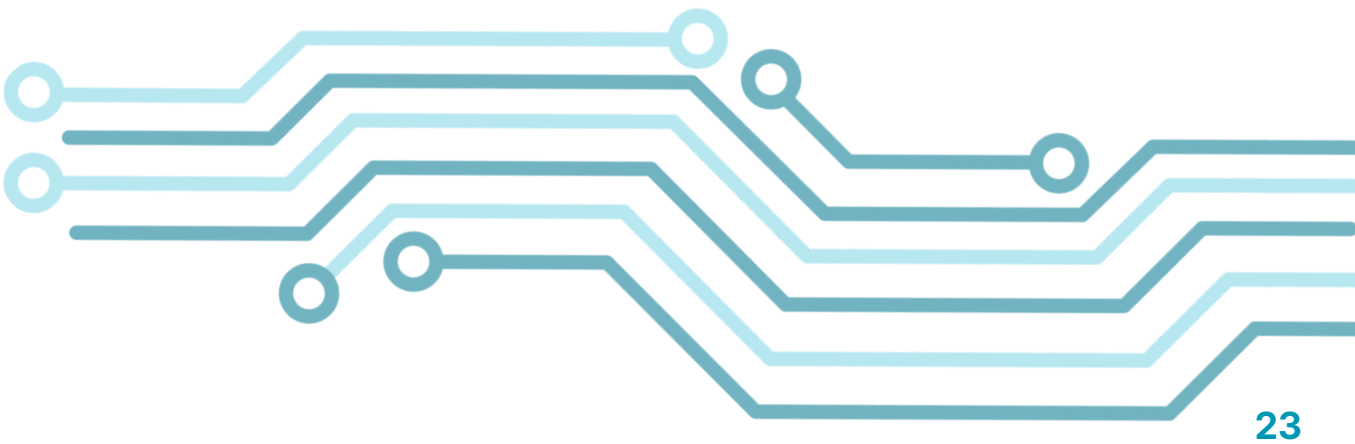
6 Work with the private sector to ensure that search engines, social networks and AI systems do not monetize climate mis- and disinformation content producers by establishing licensing contracts with clear terms of responsibility from content providers.

7 Ensure that all AI applications in advertising have safety-by-design embedded from the outset, not retrofitted.

For advertisers:

8 Publicly state in open sources that are readily accessible by brands, advertising industry actors, shareholders and consumers that information integrity on climate and environmental issues is a company policy priority.

9 Clarify the fiduciary and statutory duties and liabilities of company directors in domestic and international law, including human rights law, in relation to decisions on advertising spending and ad placement, including the short, medium and long-term impact of customer attrition, legal and regulatory exposure, brand devaluation and environmental degradation.



3. Transparency of digital advertising supply and value chains

Goal/vision: Processes, tools and technologies used in ad placement in digital advertising and their impact on climate information integrity are transparent for law and policy makers, brands, advertisers, consumers and other interested stakeholders without further increasing potential violations of the right to privacy via data collection and profiling, to enable advertisers to make informed decisions about their spending, and to inform the development of governance frameworks to support those choices and respond to risks.

Policy priorities

1. Empower brands and advertisers with the data and information they need, with full respect for user privacy, to make choices about where and how to spend their money, including through transparency of the tools and techniques used by advertising industry actors and their consequences for both the public good and brand safety.

2. Provide data and resources to enable academia and research institutes to meaningfully study the digital ecosystem, with a view to improving public policy, empowering advertisers and providing recommendations for the private sector, all while respecting user privacy.

3. Strengthen transparency across the advertising supply chain through mandatory reporting obligations on how digital advertising tools and techniques (including AdTech, AI - including Agentic AI - and other emerging technologies) are used to target consumers, as well as in relation to funding relationships and vested interests in climate mis- and disinformation, and in relation to their Advertised Emissions calculations.

Practice

For State actors:

1. Require government and public entities to publish their advertising policies and ensure transparency regarding the procedures and criteria used to allocate advertising placements and to select and recruit advertising industry actors.[67]

2. Take appropriate legal, administrative or policy measures, in line with international human rights law, to require advertising industry actors to regularly monitor, assess and disclose to brands, advertisers and regulators data at placement and transaction level, excluding user-level data, their risks, dependencies and impact on information integrity along their supply and value chains, including through the use of algorithms and media buying processes, AI-generated or mediated content, and the dissemination of mis- or disinformation on climate and environmental issues.

[67] For example, Brazil recently published information on the website of its Secretariat of Social Communication (SECOM) explaining the procedures governing both traditional and digital government advertising, how media outlets can register to be included in the list of eligible publishers, and the minimum requirements applicable to each category of media outlet, including digital advertising distribution intermediaries.

3 Take appropriate measures, in line with international human rights law, to require digital platforms, social media companies, AdTech companies and generative AI companies to provide meaningful ad placement transparency, excluding user-level data and private interactions, so that advertisers have direct visibility of the kind of content and creators their ads monetise, in line with the principles set out in this Charter.

4 Take appropriate measures, in line with international human rights law, to require advertising industry actors to adhere to industry best practices and carbon accounting standards to help advertising businesses measure greenhouse gas emissions more accurately across media channels, cloud computing services, AI businesses, countries and their partners.

5 Take appropriate measures to ensure advertising industry actors publicly disclose their relationships with fossil fuel actors, including sponsorship, through relevant client disclosure reporting requirements, to include verified ultimate funders, spend and targeting criteria.

6 Take appropriate measures, in line with international human rights law, to require advertising industry actors to periodically and publicly disclose – in ways that researchers, civil society and other public interest actors can access – disaggregated data about how their advertising tools, technologies and processes create, disseminate, moderate and categorize environmental and climate content, as well as user interaction with and revenue generated by such content.[68]

7 Take appropriate measures, in line with international human rights law, to require social media platforms, AdTech vendors and Generative AI companies to verify each and every advertiser, and to adopt and publish clear policies regarding procedures and criteria used to allocate advertising placements by governments and public entities. Creators who are in a high-risk context should be given access to a mechanism to anonymise their identity on the basis of threats and risks. Such mechanism needs to be subject to independent oversight.

8 Require digital platforms to maintain, in all jurisdictions, an up-to-date publicly accessible and searchable archive of all paid advertisements including political, issue-based and fossil-fuel lobby advertisements, disclosing verified ultimate funders, spend, targeting criteria and public placement URLs, excluding user-level data to allow identification of ad placements and revenue flows.[69]

9 Consider measures, in line with international human rights law, to bring transparency and accountability into the AdTech system. This includes adopting Know Your Customer (KYC) requirements and beneficial ownership disclosure requirements[70] for all ad brokers, to verify the beneficial owners, locations, and legitimacy of every vendor, ad network, and verification firm they transact with. AdTech brokers should be required to report this

---

[68] The EU Digital Markets Act can be a reference in this regard. Organization for Security and Co-operation in Europe (OSCE), Office of the Representative on Freedom of the Media, *Safeguarding Media Freedom in the Age of Big Tech Platforms and AI* (2025), p. 106.

[69] See International Court of Justice, *Obligations of States in Respect of Climate Change*, Advisory Opinion of 23 July 2025.

[70] Know Your Customer (KYC): Verification by advertising industry actors that the businesses and organisations they transact with, including advertisers, intermediaries and monetised sellers above a defined threshold, are legitimate legal entities, together with identification of their beneficial owners. Unlike Know Your Customer obligations in the financial sector, it does not involve verifying the identity of, or monitoring, members of the public who see advertising.

information to both clients and regulators to ensure supply chain integrity, to report on risks and to inform the creation and maintenance of a public registry of environmental lobbying through digital advertising, to protect the interests of brands and the rights of consumers in relation to climate mis- and disinformation. This should be used in conjunction with other privacy and best interest protection measures, and not introduced piecemeal.[71]

10 Consider an equivalent for agentic AI, as a Know Your Agent requirement. Establish central AI agent registries maintained by independent regulatory bodies, requiring disclosure of system names, model architecture, training data categories and other relevant information, all while protecting user privacy.[72]

11 Mandate machine-readable credential tagging for all AI-generated advertising content, embedded via watermarking or metadata standards.

12 Design and prescribe penalties and remedies, including deletion of the data concerned, for use of behavioural tracking technologies that unlawfully, unnecessarily, and disproportionately interfere with human rights, including the right to privacy and freedom of expression, and access to information, enforced by an independent and sufficiently resourced regulator.

13 Prohibit public authorities from systematically acquiring personal data from advertising industry actors and data brokers, and subject any access to the legal safeguards, transparency and due process that apply to compelled disclosure, in line with international human rights law.

14 Consider enacting or amending legislation and/or regulations, in line with international human rights law, to include calculation and disclosure of Advertised Emissions from companies in the digital advertising ecosystem who receive the majority of their revenue from the creation, facilitation or display of advertising (i.e. advertising holding companies, AdTech, AI and other emerging technology companies and major social media companies).

For advertisers:

15 Obligate transparency from advertising industry actors, by requiring them to provide data, at placement and transaction level, excluding user-level data, on an ongoing basis, to enable end-to-end validation of the advertising supply chain, to verify where ads are placed, how media buying decisions are made, and the human rights and environmental impact of their advertising spend, and the return on advertising investment, with full respect to user privacy.

16 Require advertising data to be published at domain and channel level, including placement and blocking data, with granular and creator-level data available only to vetted researchers, as well as criteria including data protection compliance, that websites or platforms must

---

[71] Forum on Information and Democracy, *Strengthening Information Integrity on Climate Change and the Environment* (February 2026), p. 35; see also Check My Ads Institute, "A New Future for Digital Advertising; Policy Solutions to Restore Adtech Integrity" (last updated 13 June 2025).
[72] See OpenID Foundation, *Identity Management for Agentic AI: The New Frontier of Authorization, Authentication, and Security for an AI Agent World* (October 2025). Available at: https://openid.net/wp-content/uploads/2025/10/Identity-Management-for-Agentic-AI.pdf.

adhere to before they are able to be monetized, in order to support research into human rights responsible advertising placements and monetization.[73]

17 Conduct, fund or otherwise promote independent, human rights-based, evidence-based public interest research on climate mis- and disinformation in the digital advertising industry to identify and mitigate risks for brands, consumers and climate information integrity.

18 Require advertising supply chain providers to conduct regular client disclosure reporting (CDR), independent third-party audits and vetting of content, ad exchange supply partners, revenue sources and revenue-sharing arrangements with advertisers and content creators and ensure transparency through the publication and dissemination of findings, and in measurement and reduction of Advertised Emissions.

[73] *Strengthening Information Integrity: Advertising, Artificial Intelligence and the Global Information Crisis*, Issue Brief 2 (United Nations publication, 2026), p. 16; *United Nations Global Principles for Information Integrity: Recommendations for Multi-Stakeholder Action* (United Nations publication, 2024), p. 27.

4. Safeguarding against greenwashing in advertising practices

Goal/vision: Measures are in place across the advertising supply chain to guard against greenwashing practices, and to uphold transparency and accountability for any advertised claims made by companies and entities about decarbonisation, fossil fuel emissions, climate change and environmental protection policies and achievements, as well as to help consumers understand why and how they have been targeted.

Policy priorities

1. Protect consumers from exposure to misleading advertising by ensuring that any climate or environmental claims made about products, services, companies or other entities are evidence-based and verifiable.
2. Ensure that advertising supply chain actors are transparent about the veracity of any climate and environmental claims they make or monetize for companies or other entities.

Practice

For State actors:

1. Ensure that any measures in place to regulate private sector claims made about decarbonisation, fossil fuel emissions, climate change and environmental protection policies and achievements, are aligned with international human rights law and are informed by science-based criteria.
2. Consider introducing legislation or regulations, in line with international law, to require that any environmental claims made through advertising are substantiated before publication.
3. Consider establishing or strengthening regulations of advertising to guard against greenwashing practices, supported and substantiated by independent regulators empowered to take actions, including public reporting of greenwashing through advertising.
4. Challenge any environmental claims made by businesses by empowering independent regulators to verify information, prioritising those companies and entities that have the greatest reach through mass market advertising, and commensurate capacity for harm.
5. Put efficient processes and low-cost tools in place to support small and medium businesses to accurately and efficiently verify and disclose their environmental impact and incentivise their continued decarbonisation efforts through public recognition including through advertising.

6 Ensure that any measures put in place to enforce regulations around environmental information integrity in advertising, apply penalties in proportion to the reach and potential impact of the company or entity making false or misleading environmental claims.

7 Design measures to deter greenwashing not only by penalising companies and entities that cause the most harm through misleading statements, but by rewarding genuine disclosure and improvement via procurement processes.

For advertisers:

8 Adopt as a matter of internal governance the requirement that any environmental or net-zero claim is reconciled against actual capital expenditure, lobbying activities and full value-chain emissions before it is advertised.

9 Approach sustainability as a competitive advantage for brands and leverage advertising as an instrument for shifting mainstream demand towards lower-carbon choices, to reach new audiences.

10 Ensure that any advertised environmental claim is signed off by sustainability and legal teams to ensure that supporting evidence and data exist before it is advertised to mitigate against the risk or perception of greenwashing.

11 Adopt and make publicly available the standards that must be met before an account will be accepted, including the evidentiary threshold required for any environmental claim before any advertising will be produced based on it.

12 Test the information integrity and compatibility of potential clients or suppliers of advertising services against whether priority is given to genuine, accurate and evidence-based environmental communication and messaging.

13 Only advertise environmental claims or pledges of companies or entities that are evidence-based and independently verifiable through emissions data and mitigation measures that are transparent to potential investors, consumers, researchers and other actors so that they are able to verify claims without having to request data and substantiating methodology.

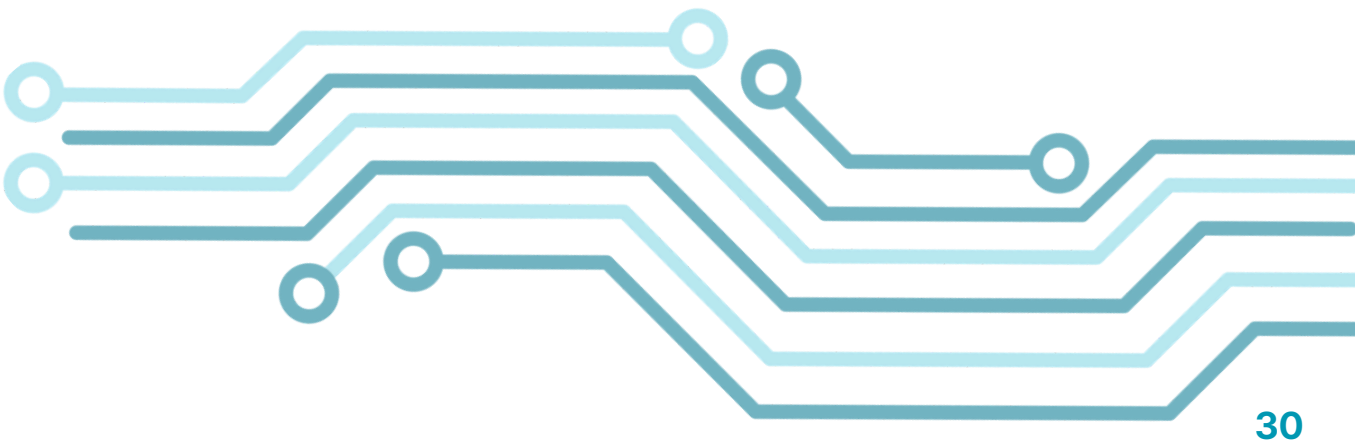
14 Guard against the misuse of advertising practices by fossil fuel industry actors to sanitise their image, including by independently verifying the evidence basis for any environmental claims made, including by screening every advertising campaign at the design and creative stages.

15 Adopt a broad approach to what may constitute greenwashing practices, to mitigate the risk that images and language used in communications and messaging in digital advertising could be misleading, including by avoiding showcasing cherry-picked ‘best practice’ examples that are misrepresentative of the overall environmental impact of the company or entity.

16 Adopt self-regulation practices and policies around greenwashing practices that are efficient and transparent to potential consumers who are targeted or otherwise exposed to digital advertising.

17 Require companies or entities who are seeking advertising services to fully disclose the environmental impact of assets, investments and activities and those of their partners.

18 Monitor and report internally on the gap between advertised and actual sustainability performance, treating a widening gap as a mandatory trigger to review and potentially withdraw any advertised claim.



5. Accountability for harm to climate information integrity

Goal/vision: Advertising industry actors across the advertising supply chain are accountable for promoting climate information integrity and safeguarding human rights standards through reporting and transparency mechanisms.

Policy priorities

1. Advertising industry actors make policy commitments to leverage the communicative power of advertising to strengthen rather than undermine human rights protections and climate information integrity, and work with civil society and advertising stakeholders to drive transparency and accountability through the advertising supply chain.

2. Human rights due diligence processes and accountability mechanisms make climate and environmental information integrity measurable, auditable and enforceable across advertising services.

Practice

For State actors:

1. Review and amend existing laws on data collection and ad content in line with international human rights law, to ensure that legislation is responsive to new and emerging technologies used in digital advertising, including generative and agentic AI tools, require advertising industry actors to conduct human rights due diligence across their business models, as set out in the UN Guiding Principles on Business and Human Rights and to identify implementation gaps in the duty of care owed by advertising industry actors to customers and users for third-party content.

2. Enact or amend legislation, in line with international human rights law, to require parent companies established within the jurisdiction, to report on human rights and environmental impacts and mitigation measures taken in their advertising supply chains, and to establish extraterritorial jurisdiction in relation to human rights harms caused by companies domiciled in their jurisdiction.

3. Consult with civil society, media, and advertising industry actors to develop policies that encourage investment in public interest journalism, and fairly distribute advertising income to support free, independent, and evidence-based reporting on climate and environmental issues, including by promoting sustainable funding models and relationships between large and independent news organisations.

4. Consult with advertising industry actors, civil society, international organisations and other actors with human rights and commercial expertise, to identify and mitigate human rights risks posed by the attention economy to support brand advertisers and consumers to design digital advertising systems and processes that uphold rather than undermine climate and environmental information integrity.

5 Put in place mechanisms, in line with international human rights law, to ensure accountability for adverse human rights and other impacts of climate and environmental mis- and disinformation across advertising supply chains.[74]

6 Provide consumers with meaningful transparency in relation to the ads that they see to understand, contextualise, and critically assess the ads they are shown. That should include live information to viewers of ads, as well as ad libraries that contain complete, real-time and detailed information, made public through application programming interfaces (APIs) revealing information such as the content of the advertisement, the sponsor of the ad, the period when the ad is run, the targeting and amplification techniques used, including among other information the specific groups of recipients targeted, the parameters used to determine the recipients, the number of individuals who saw the ad, the source of personal data and a link to effective means to support the individual's exercise of their rights.

For advertisers:

7 Identify and mitigate risks to information integrity that result from business models of actual and potential advertising suppliers, including risks arising from the removal of accurate and reliable public interest media content.

8 Require advertising supply chain service providers to publicly share policy commitments on information integrity, human rights and climate change, and put accountability mechanisms in place to mitigate and redress harms caused by advertising processes and placements.

9 Require advertising supply chain service providers to have algorithmic systems independently verified for their compliance with information integrity standards, international human rights standards and domestic law.

10 Advertise with media outlets and platforms that bolster climate and environmental information integrity, including public interest journalism, through methods such as inclusion and exclusion lists, ad verification tools and manual vetting.

11 Engage with advertising industry actors that invest in training programmes to develop skills to use AdTech, AI and other emerging technologies in ways that uphold rather than undermine climate information integrity.

12 Require advertising supply chain providers, including AdTech, AI and other emerging technology service providers, to identify and mitigate risks in relation to climate and environmental information integrity that may result from business models, including from the removal of accurate and reliable public interest media content.

13 Require advertising supply chain providers to conduct due diligence risk assessments for digital platforms in relation to the dissemination of mis- or disinformation on climate and environmental issues, and to publish criteria that websites or channels must adhere to before they can monetize content.[75]

---

[74] *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (United Nations publication, 2011), Guiding Principles 28–30; *United Nations Global Principles for Information Integrity: Recommendations for Multi-Stakeholder Action* (United Nations publication, 2024), p. 27.
[75] Forum on Information and Democracy, *Strengthening Information Integrity on Climate Change and the Environment* (February 2026), pp. 34–35.