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ON THE BACK BURNER:

HOW FACEBOOK'S INACTION ON MISINFORMATION FUELS THE GLOBAL CLIMATE CRISIS

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STOP FUNDING HEAT, May 2021

https://www.stopfundingheat.info

FOREWORD

In the run-up to the COP26 global climate change conference this November, the stakes could not be higher. Yet just when international collaboration is most urgently needed, efforts to address the threat of climate change continue to be undermined by large-scale, well-funded, organised misinformation campaigns.

Drawing on decades of tried and tested PR techniques for undermining science, these campaigns seek to downplay the dangers of climate change, and hamper the search for workable solutions. Climate denialist groups are actively using social media to advance this agenda – both through organic campaigns and micro targeted advertising.

Studies in recent years have pointed to crises in public health, political polarisation and accelerations of hate speech – even incitement to genocide – all gestating and growing through online platforms. But less has been written on how digital media platforms have helped spread climate misinformation, and to date there is no summary of the existing literature.

Stop Funding Heat wanted to go through the data with a fine-tooth comb, starting with one of the biggest offenders: Facebook.

After months of pulling together the evidence, we have found that the situation is worse than we initially envisaged – so much so that we have been compelled to publish what was originally going to be private research.

Facebook not only has insufficient rules in place to credibly combat climate misinformation, but even its basic policies are failing.

What has become clear is that Facebook's product and policies need to change. Yet the company has no incentive to change its business model. Any government committed to tackling climate change needs to wake up to the systemic risk posed by Facebook's business model in accelerating climate misinformation. Activists, journalists and ordinary Facebook users can help through boycotts, actions, sharing and talking about this report. Facebook relies on advertising for 98% of its revenue – and the impact of the Stop Hate For Profit campaign has shown that when big advertisers speak out, Facebook will respond. Brands and investors need to ensure they are on the right side of history, and show Facebook they do not want to give money to a platform that is actively threatening human survival.

EXECUTIVE SUMMARY

Facebook has a problem with misinformation, one that CEO Mark Zuckerberg has admitted himself. Over the years, headlines have focused on Facebook's role in helping to undermine democratic elections, amplifying hate speech and spreading public health misinformation, in particular during a global pandemic. But given the severity of the global climate crisis, there has been a disproportionately small amount of attention paid to Facebook's role in aiding and abetting climate change misinformation.

In this report, Stop Funding Heat – a campaign committed to making climate denial and climate misinformation unprofitable – has summarised all the literature it could find on climate misinformation on Facebook.

In Part 1, "Introduction", we define key terms such as "misinformation", "disinformation" and "false news", and use academic studies to demonstrate why climate misinformation is a problem in the first place. We finish this section by making the case that with COP26 and the increased likelihood of adverse weather events, online climate misinformation is likely to escalate in 2021. Facebook needs to be ready.

In Part 2, "Facebook's Climate Policy Gap", we check how Facebook's policies currently measure up to the scale of the climate crisis and the expected rise in the incidence of climate misinformation. We find that, despite a strong public alignment to fighting climate change and combating misinformation, there is a disappointing follow-through in Facebook's public documentation. Climate change is not mentioned in any of Facebook's misinformation documentation, despite other important themes like hate speech, political misinformation and public health misinformation all being referenced. We conclude in this section that without addressing climate misinformation specifically, Facebook is hindering its staff and partners from solving the problem.

Part 3, "Facebook is Not Walking The Walk on Climate Misinformation" is the longest section of this report. Here we find that Facebook's two existing misinformation solutions – the Third-Party Fact-Checking Program and the Climate Science Information Center – are not sufficient and, in the case of the former, often not being implemented as intended. We focus on climate misinformation where possible, but due to the lack of study compared to other areas we also investigate other themes. This is upon the understanding that the mechanisms and networks that spread misinformation of all kinds are related.

Part 3 contains two major sections. In the first, covered by 3.1 and 3.2, we summarise numerous empirical studies, including but not limited to:

      - A landmark InfluenceMap report finding climate misinformation present in Facebook
      advertising in the US.
      - Avaaz reports demonstrating Facebook's failure to combat misinformation on Covid-19 in 2020.
      - An Institute for Strategic Dialogue (ISD) study asserting that Facebook is not meeting
      the challenge
      of combating election misinformation.
      - Several studies covering the growth of content from deceptive news sites, a growing frontier of
      misinformation on the platform.
      In the second section of Part 3, covered by 3.3 and 3.4, we reference journalistic investigations that

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have looked into Facebook's climate misinformation solutions, including but not limited to:
- A controversy that lasted over a year in which climate science framed as "opinion" was not fact-checked.
- A loophole that still exists where politicians are exempt from fact-checks.
- A fundamental misunderstanding in how the Climate Science Information Center can genuinely "inoculate" against climate misinformation in its current state.

Ultimately, our research unearths significant evidence that Facebook is not doing enough on climate misinformation or, in many cases, misinformation in general. Contained within the same report for the first time, the evidence in its totality is overwhelming. But, with just over half a year until pivotal talks at COP26 this year, there is still time to fix this.

Lastly, Part 4 makes several recommendations to Facebook based on our findings. Our recommendations to Facebook are, first, that it adds climate change misinformation to its relevant public misinformation documentation. Secondly, that internal research on climate misinformation is shared with researchers and journalists so this issue can be solved collaboratively. Thirdly, that it confirms all climate related content on its advertising platform is genuinely checked for misinformation, including by humans. Fourthly, that it confirms and demonstrates action taken against repeat offenders on both its advertising platform and through organic content.

Part 4 also makes recommendations to brands, activists, investors and governments. We recommend that brands strongly consider a renewed advertising boycott of Facebook until clear improvements are made. To activists, we recommend they join the call for Facebook to clean up its act on climate misinformation. To investment funds claiming to integrate environmental, social and governance risks into their decision-making, we recommend they pull their money from Facebook until safeguards are implemented to ensure re-investment will "do no harm". Finally, to governments, we recommend a broad approach to regulating platforms as large as Facebook.

PART 1 - INTRODUCTION

1.1 Background to this Report

Since being founded in February 2004, Facebook's meteoric rise to being one of the largest companies on the planet has not been without issues. Over the years, headlines have focused on Facebook's role in undermining democratic elections, amplifying hate speech and spreading public health misinformation. While the severity of these problems matched the scale of the attention, there has been a disproportionately small amount of attention paid to Facebook's role in aiding and abetting an existential crisis – human-made climate change.

That is not to say there is no literature out there on this issue. At Stop Funding Heat we have carefully collected the evidence and it is clear – Facebook's algorithm is fuelling climate misinformation, and its proposed solutions are not working well or fast enough. Its business interests are fundamentally misaligned with our ability to combat climate change.

This first section sets the overall context of the report, including important definitions from the literature. The next two sections then outline the problem in two distinct ways: first, that Facebook's claims of fighting climate change are not matched by its policies (Part 2); and second, even the policies it currently has are not being enforced, or are otherwise being undermined (Part 3). Part 4 explores possible solutions.

The threat of climate change to our society and communities grows every year. In 2018, the Intergovernmental Panel for Climate Change (IPCC) found that we could cross the crucial threshold of 1.5 degrees warming as early as 2030, less than ten years from now. According to researchers at 350, this means adverse weather events, sea level rises, millions of otherwise preventable deaths, and potential global loss of US$20 trillion this century.

The 26th Conference of Parties (COP26) climate summit in Glasgow this year is the most pivotal since the conference in Paris in 2015, as it is the first COP to take place since the Paris Agreement's measures come into effect. Governments urgently need to strengthen measures to reduce CO2 emissions. But bad actors with vested interests will seek to stop this by any means necessary, including using social platforms to undermine science and encourage delay. We hope this report will assist activists, campaigners, researchers, journalists, politicians and, yes, Facebook and its staff, to take the appropriate actions for a future that avoids further delay on climate action; for a future that avoids climate catastrophe.

1.2 About Stop Funding Heat

Stop Funding Heat is a group of activists committed to making climate denial and misinformation unprofitable. We do this by exposing misinformation about climate change and its underlying causes in the press and on online platforms – and by encouraging brands to avoid advertising with the worst culprits. To learn more about our campaign or to contact us visit www.stopfundingheat.info

1.3 Key Definitions

"Misinformation" vs "Disinformation"

In order to understand the extent of climate misinformation on Facebook we must first unpack what is meant by "**misinformation**", as well as similar terms such as "**disinformation**" and "**fake news**". Fortunately, there appears to be consensus in both academic and other literature on how we should define these terms.

According to leading climate communication researcher, John Cook, misinformation is "information initially presented as true but later found out to be false". Disinformation, however, is "false information disseminated with deceptive intent". Cook goes on to say that "unlike disinformation, misinformation is agnostic to the intent of the source". This view is corroborated by a number of sources, including the 4As white paper, where "disinformation is distributed with the intent to deceive [and] misinformation is distributed without the intent to deceive". Crucially, we have not found a dramatically separate version of this definition anywhere in the literature.

The summary research paper Online misinformation about climate change contains a useful diagram of the distinction, reproduced below, where disinformation is a subset of misinformation, which in turn is a subset of information.
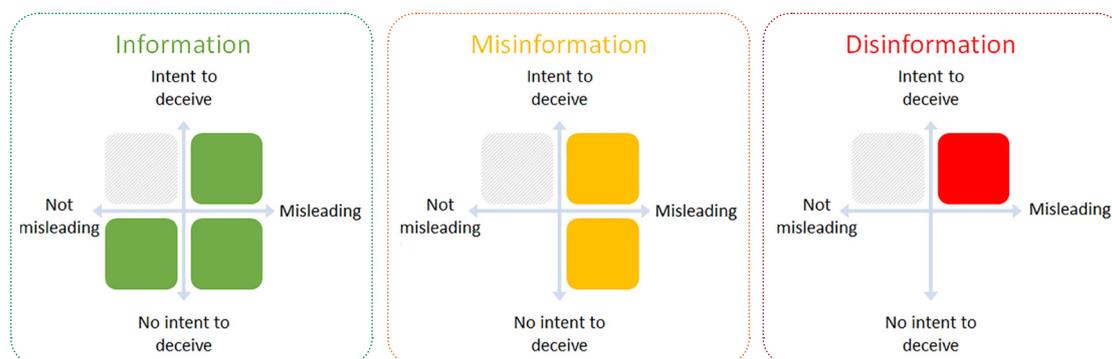

Figure 1: A visual representation of the distinction between disinformation and misinformation, reproduced from Online misinformation about climate change, by Treen, Williams and O'Neill.

At this point, we should note that it is very difficult to quantify disinformation online, as it requires an understanding about the intent of the spreader. Nor does it matter for the purposes of researching false information; as someone receiving information is unlikely to be more or less convinced online by someone spreading it on purpose, or by someone spreading it unwittingly. As such, we have found that all studies seeking to quantify the problem either do not make a distinction at all or strictly cover **misinformation** on online platforms. Meanwhile, a separate line of research uses investigative journalism tools and techniques to find the **disinformation** spreaders, i.e. the bad actors.

For the remainder of this report we will be using the definitions of misinformation and disinformation as given in this section, where disinformation shows clear intent and misinformation does not. As such, you will see us

"Fake News" vs "False News"

The term **fake news** was specifically avoided in the literature we found as it is not considered a scientifically neutral term, having been used over recent years to defame and damage reputations. However, as will be seen in the next chapter, Facebook confusingly uses the term **false news** as an equivalent to **misinformation**. Indeed, much of the company's literature appears to use the two terms interchangeably. False news is not generally seen anywhere else in the literature on misinformation, apart from when referring to Facebook.

For the remainder of this report we will be using the term false news only in the contexts where Facebook has used the term itself.

"Climate Misinformation" vs "Climate Denial"

In the context of climate change, many people will equate climate misinformation with **climate science denial** (or **climate denial** for short). This is matched in academic practice, with the previously cited summary paper, Online misinformation about climate change, stating "the recent academic focus on misinformation can, for climate change, be seen as a re-framing of longer standing academic discourse on these topics", which include, according to the paper, "skeptical discourse", "skeptical arguments", "denial campaign[s]", "contrarian messages" and so on.

Climate denial itself is very wide ranging. The taxonomy reproduced below, published in John Cook's 2020 paper Deconstructing Climate Science Denial, covers well known forms of climate denial attacking the science such as "it's not happening" and "humans aren't causing it". But climate denial also covers misinformation that results in delaying action on climate change, such as: undermining potential policies or solutions, attacking climate scientists or advocacy groups, or implying a social or economic need to continue with our current emission levels.

The 26th Conference of Parties (COP26) climate summit in Glasgow this year is the most pivotal since the conference in Paris in 2015, as it is the first COP to take place since the Paris Agreement's measures come into effect. Governments urgently need to strengthen measures to reduce CO2 emissions. But bad actors with vested interests will seek to stop this by any means necessary, including using social platforms to undermine science and encourage delay. We hope this report will assist activists, campaigners, researchers, journalists, politicians and, yes, Facebook and its staff, to take the appropriate actions for a future that avoids further delay on climate action; for a future that avoids climate catastrophe.
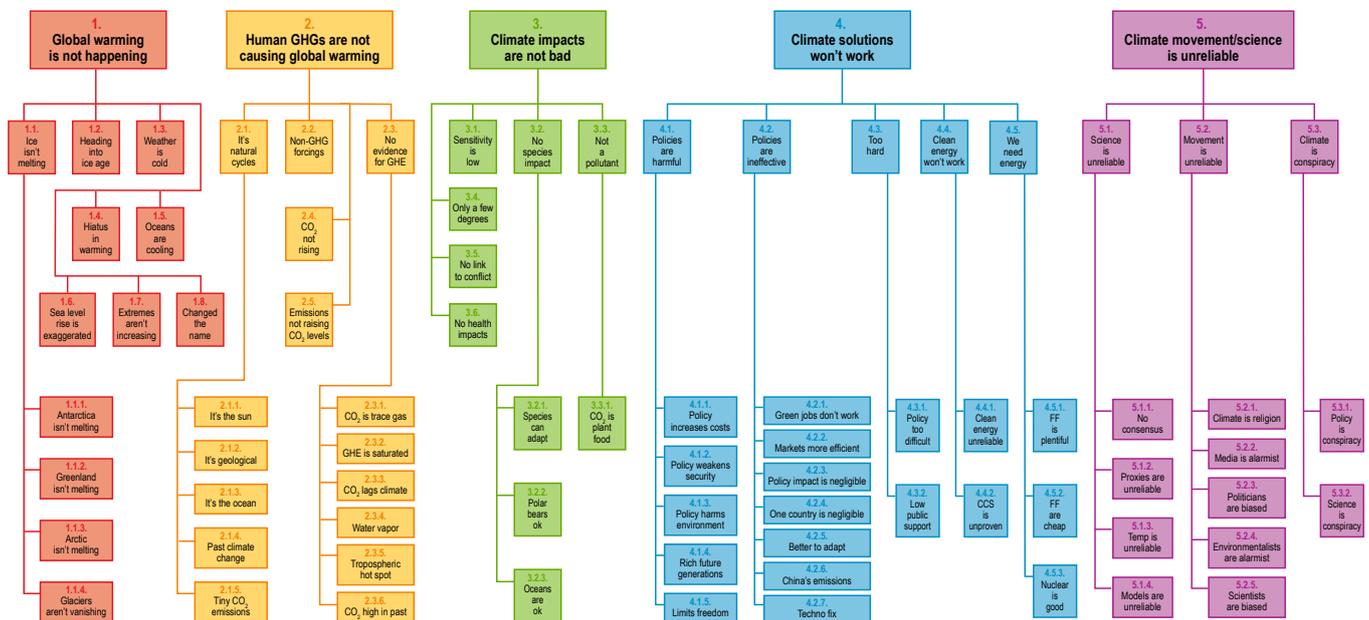
Figure 2: The different forms of climate science denial. Reproduced from Deconstructing Climate Science Denial, John Cook, 2020.

Misrepresentation is another form of climate misinformation that Stop Funding Heat is monitoring, in particular in relation to corporate advertising. Colloquially, this is known as **greenwashing**. While there is no false information in, for example, a fossil fuel company stating its total capital investment in clean energy, or a car manufacturer stating the number of lines of electric vehicles it is launching, the reality is that, in proper context, this practice may misleadingly overstate the significance of the action being taken in an effort to sell products or to deflect criticism. Given the historical context of denialism from the fossil fuel industry, this activity is a growing battleground for delaying action. That said, because this form of misrepresentation is still an emerging issue in the context of Facebook, in this report we have only focused on **climate denial**, as defined in the above taxonomy, as climate misinformation.

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1.4 The Very Real Harms of Climate Misinformation

We will not be debating or referencing climate science in this paper. Indeed, according to Facebook themselves, *"Climate change is real. The science is unambiguous and the need to act grows more urgent by the day."*

But is climate misinformation actually harmful? Though it may seem obvious to some, it is a question worth exploring. The literature is plentiful, with this 2019 paper by John Cook citing a number of studies demonstrating how misinformation leads to a change of attitudes or lack of action on climate change. Three stand out papers include:

> 1) Ranney & Clark found that even a few misleading statistics can, relatively speaking, greatly lower acceptance of climate change.
>
> 2) McCright, Chartman, Dentzman and Dietz found that "counter-frames" used to deny anthropogenic climate change "significantly reduce ... Belief in the reality [and] belief about the veracity of climate science [and] support for aggressively attempting to reduce ... Emissions in the near future".
>
> 3) Van der Linden, Leiserowitz, Rosenthal and Maibach found that misinformation targeting scientific consensus significantly decreases the perceived scientific consensus, which subsequently lowers other climate attitudes, including policy support.

Finally, section 5 of the already referenced paper by Treen, Williams and O'Neill also amply covers the historical research around harms created by climate misinformation, with its roots in the tactics employed by the tobacco industry to delay legislation in the 1990s.

1.5 Climate Misinformation is Expected to Rise in 2021

Private research seen by Stop Funding Heat has shown that news stories of climate change and adverse weather events peak during political events relating to climate. Misinformation campaigns rise and fall in line with this. There is public research that at least confirms this phenomenon of climate misinformation peaking during political events. That said, one can simply observe the phenomenon in relation to both political news and adverse weather events, as it has happened consistently in the past. Five examples are:

- "Climategate" papers released and spread on social media during COP15, Copenhagen. Other issues derailed COP15 proceedings in 2009, with the "Danish text" often cited as a big contributing factor. However, the fact remains that the misinformation campaign ran. In the 2021 context, misinformation of this sort is more liable to reach further than in 2009. See more detail on Climategate here, with streamlined debunking of the myths here.
- Misinformation about the UN Compact for Migration, causing some countries to withdraw from the agreement (2019).
- Posts, among other things, blaming "greenies" and arson attacks for Australian bushfires (2020). See a comprehensive list here.
- Misinformation about Oregon wildfires (2020).
- Misinformation about wind turbines being solely responsible for power outages during the Texas winter storm (2021). See also here.

With the US rejoining the Paris Accord in 2021, the upcoming COP26, plus adverse weather events on the rise year-on-year, we can expect coordinated misinformation and disinformation efforts to appear at these same times throughout the year. Facebook needs to be ready.

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1.6 What this Report Does Not Cover

This report focuses on climate misinformation as much as possible. As such, we are not covering other responsibilities that Facebook has with regards to climate change. We talk only briefly at the start of Part 2 about Facebook's environmental stewardship policies. We do not cover developments outside of misinformation that have worrying implications for the climate, such as Facebook entering into professional partnership with problematic outlets known for climate misinformation such as the National Review, The Washington Times, Fox News and – most controversially – Breitbart, or Facebook overseeing the illegal sale of Amazon land plots on its Marketplace. Indeed, there may be other examples; if you know of any, please get in touch so we can continue to document the issues.

This report focuses entirely on the Facebook platform. This means that we have not examined other platforms owned by Facebook, including Instagram, Messenger and WhatsApp. This was a hard decision to have to make, as the two messenger apps have 1.3 billion and 2.0 billion monthly active users respectively, while Instagram has 1.0 billion. These are smaller numbers compared to Facebook's 2.8 billion, but clearly large enough to warrant their own investigations. We briefly footnote here three relevant studies,[1] although there is almost certainly more evidence on these platforms.

Additionally, we have not covered other major platforms, such as Twitter or YouTube.[2]

Finally, like all reports, we did not have unlimited time to produce it. All citations were accessed on 27th April 2021. You may know of, or find information, that is not mentioned here, particularly anything written close to the publication date. This may support or even contradict our findings. We are considering this an ongoing conversation and are doing our best to continue storing and updating whatever information we find – so please do get in touch with additions or comments by emailing sean@stopfundingheat.info or tweeting us @stopfundingheat

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[1] For messenger apps, an EU Disinfo Lab study showed that these apps accounted for at least 13% of Covid-19 misinformation – likely a severe underestimate due to the nature of messaging apps making it hard to draw any statistically reliable conclusions. Secondly, an Avaaz study found that 26.1% of Spaniards surveyed had seen false, misleading, hateful or racist content on WhatsApp leading up to the Spanish 2019 elections. This figure is likely more accurate. For Instagram, there has been a recent study by the Center for Countering Digital Hate and Restless Development that demonstrates how new Instagram tools including "explore" and "suggested posts" encourage users to view increasingly extremist content. As with all the other empirical studies in this area (see Section 3.2), none of these reports mention climate misinformation specifically.

[2] One Avaaz study did specifically look into climate misinformation and YouTube, but as the platform works very differently to Facebook, it is not covered in any major way in our report.

PART 2 - FACEBOOK'S CLIMATE POLICY GAP

2.1 Facebook's Public Stance on Climate Change

As already covered, Facebook is very vocal about its commitment to fighting climate change. But what does Facebook say it is specifically doing in this fight? We can summarise its strategy into two broad components.

The first component is environmental stewardship, which is covered in detail on a sustainability sub-domain. This is not the focus of our research and so will not be investigated further.

The second component addresses the information on the platform. Facebook's September 2020 blog Stepping Up The Fight Against Climate Change mentions two specific initiatives:

- Initiative 1: Launching and promoting The Climate Science Information Center. This is a portal-like page that "*connect[s] people to factual and up-to-date climate information*". Although information on the Center is sparse, it is likely that users mainly find it when they search climate related terms. A blog post in February 2021 provided an update on this initiative, including: rolling it out from 4 to 16 countries; adding the UN Environment Programme as a link to those countries that do not have it; adding a section including fact-checks and debunking common climate myths; and trialling informational labels for UK users when looking at any post that mentions climate change.
- Initiative 2: "*70 independent fact checking organisations covering over 60 languages ... can and do check climate science content*". This is an indirect reference to Facebook's Third-Party Fact-Checking Program, which actively works to reduce "false news" on the platform.

From our extensive research, these two initiatives cover Facebook's work on climate misinformation. While they are positive steps, our research in Part 3 will unearth many problems with the effectiveness and even fundamental approach of both.

2.2 Climate Misinformation Missing from Facebook's Public Policies

We wanted to investigate Facebook's documentation a little further first of all. Given Facebook's sluggishness in responding to problems in the past, we didn't want to take its word on how much climate change matters at the platform. After reviewing the documentation, it indeed appears that Facebook has missed the opportunity to take early, decisive action against climate misinformation on its platform.

Looking across the multitude of official Facebook correspondence, programmes, policies and guidelines, it is clear that Facebook is not prioritising the danger of climate misinformation on the platform.

A) No Mention of Climate Change in Community Standards

Facebook's Community Standards dictate the rules about what people and organisations may post anywhere on the platform. The approach in the Standards is to outright ban some content and investigate or reduce the spread of other content. Regarding "false news", which is Facebook's general term for misinformation, the most important passage is reproduced below:

Section 21 - False News

Reducing the spread of false news on Facebook is a responsibility that we take seriously. We also recognise that this is a challenging and sensitive issue. We want to help people stay informed without stifling productive public discourse. There is also a fine line between false news and satire or opinion. For these reasons, we don't remove false news from Facebook, but instead significantly reduce its distribution by showing it lower in the News Feed

We are working to build a more informed community and reduce the spread of false news in a number of different ways, namely by: Disrupting economic incentives for people, Pages and domains that propagate misinformation; using various signals, including feedback from our community, to inform a machine learning model that predicts which stories may be false; reducing the distribution of content rated as false by independent third-party fact-checkers; empowering people to decide for themselves what to read, trust and share by informing them with more context and promoting news literacy collaborating with academics and other organisations to help solve this challenging issue

This indicates that Facebook is taking a stance of "reduce" instead of "remove" when it comes to false news. However, this isn't reflected across the range of false news. Facebook has recently taken moves to remove all Holocaust denial as of October 2020 – found in Section 12 of the Standards - and vaccine misinformation of any kind in Feburary 2021 – referenced in Section 3 of the Standards. Additionally, Facebook already prohibits "misrepresentation" regarding census participation, voter registration or voting – also found in Section 3 of the Standards. As such, this passage on false news is incongruent with the wider approach.

What is particularly inconsistent is that, **as of April 2021, climate change is not mentioned one time in the Community Standards, nor in any of the 2020** Community Standards reports. This was addressed in an open letter to Facebook from a number of US senators in July 2020. Facebook was asked whether "the spread of false information on the climate crisis [is] included in Facebook's understand[ing] of false news". Facebook's response, in August 2020, to this specific question was simply "yes". It is perplexing, therefore, that climate change is never referenced in the documentation studied.

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B) Facebook's Position on Prohibited Content

The recent changes to prohibited content are in line with Facebook's evolving understanding of the term "harmful". In April 2020, Mark Zuckerberg personally extended the "harmful" definition to cover public health misinformation, stating "*if a piece of content contains harmful misinformation that could lead to imminent physical harm, then we'll take it down. We've taken down hundreds of thousands of pieces of misinformation related to Covid-19, including theories like drinking bleach cures the virus or that physical distancing is ineffective at preventing the disease from spreading.*"

However, there are no signs of this being extended to cover climate misinformation. In a September 2020 interview with NBC, Nick Clegg, Facebook's Vice President of Global Affairs, said while talking in the context of climate change misinformation that "*we only remove stuff where there is an obvious link to immediate and impending real world harm*". This implies that climate change is not currently considered by Facebook to be an "immediate and impending real world harm" on a par with incitement of violence, public health misinformation, Holocaust denial, or voting or census misinformation.

C) No Mention of Climate Change in the Third-Party Fact-Checking Program

As climate change is not included in the Community Standards, we checked whether it was mentioned somewhere in the Third-Party Fact-Checking Program. Unfortunately it is not, but neither are the other misinformation themes mentioned in the Community Standards.

D) No Mention of Climate Change from the Facebook Oversight Board

The Facebook Oversight Board is an initiative formed to ensure that Facebook is enforcing its own standards appropriately. According to its website, the Board was created in 2019 in order to "*promote free expression by making principled, independent decisions regarding content on Facebook and Instagram and by issuing recommendations on the relevant Facebook Company Content Policy*". The Oversight Board takes emblematic content removal or reduction cases and applies Facebook's own policies, adjudicating on whether the appropriate action was taken. Thus, the Oversight Board's remit is limited only to items that fall under Facebook's existing rules, meaning that climate change — which is not explicitly mentioned in its policies — would necessarily be hard to rule on. Indeed, none of the Board's first rulings, nor their proposed upcoming decisions, mention climate change.

E) No Mention of Climate Change in Advertising Standards

Facebook's Advertising Policies specifically mention discrimination, health misinformation, political misinformation, with even a specific clause on vaccines, but there is no mention of climate change. It is possible that climate change misinformation is counted broadly under the section on misinformation, which says it prohibits "*ads that include claims debunked by third-party fact-checkers or, in certain circumstances, claims debunked by organisations with particular expertise*". It goes on to mention that "*advertisers that repeatedly post information deemed to be false may have restrictions placed on their ability to advertise on Facebook*". The only concrete example provided under misinformation, however, is about vaccines. Without a clear example provided regarding climate misinformation, we cannot assume that it is included in the advertising standards.

As with the Community Standards, we see no reason why climate change could not be added as a specific clause, or at least as an example under the misinformation section.

F) Advertising Standards are Open to Corporate Misinformation

On Facebook, adverts relating to elections and social or political issues require pre-approval by Facebook and disclaimers in the advert. Environmental politics are included in this: "*discussion, debate and/or advocacy for or against topics, including but not limited to climate change, renewable/sustainable energy and fossil fuels*". However, Facebook's definition excludes items of a commercial nature, even if they are specifically related to renewable or sustainable energy or fossil fuels. Adverts which require disclaimers include:

> *"Going to the beach used to be fun, now all we see is waste plastics. We need environmental policy change now!"*
> *"Fracking is ruining our community."*
> *"How can we better tackle climate change?"*

Whereas adverts not requiring such a disclaimer include:

> *"Take a look at our new 2020 electric car debuted at this week's auto show."*
> *"New smart solar panels can lower your energy bills."*

This means that, while a number of charities and campaigns must jump through hoops as well as share personal information with Facebook, corporate entities do not – even if they are participating in misrepresentation or corporate greenwashing.[3] While we understand that Facebook may not count misrepresentation as climate misinformation, this practice still makes it that much easier to place political or lobbying adverts without detection, as exposed by reporter Emily Atkin on Twitter earlier this year. There is no reason why corporations that impact climate change in a big way, such as fossil fuel companies, should not be required to add disclaimers to their adverts by Facebook.

G) Infrequent Mention of Climate Change in Public Facing Blogs

Of the 19 articles on Facebook's public News Blog in 2020, including several on misinformation, only one – already referenced previously - mentions climate change. Furthermore, the timing of this blog was one week ahead of Climate Week 2020, with accompanying press relations activity. This does not mean that the Climate Science Information Center was created only for marketing reasons, but the stark contrast with this press relations activity with the overall lack of discussion of climate change from Facebook implies a lack of concerted effort on the company's part, particularly when compared to other forms of misinformation.

Another blog, also already referenced, regarding the Climate Science Information Center was posted in February 2021. This indicates a pick up in focus, which will be critical for Facebook to maintain during this crucial year for climate change action. We examine the specific changes to the Climate Science Information Center in section 3.4 below.

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[3] See the definitions section in Part 1 for our position on misrepresentation as a form of misinformation.

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PART 3 - FACEBOOK IS NOT WALKING THE WALK ON CLIMATE MISINFORMATION

Part 2 found that while Facebook's public facing blogs assure that strong action is being taken on climate change misinformation, the surface level tenacity is not matched in its policies or external documentation. In these regards, Facebook needs to do more.

Additionally, we have found from reviewing a broad range of empirical and journalistic literature that the actions being taken by Facebook are not as effective as they may appear. This part of our report is broken down into four sections. First, we look at the money Facebook receives on its advertising platform to spread climate misinformation. Then we look at empirical evidence demonstrating that Facebook's attempts to reduce misinformation are not that successful yet. This should not be a surprise, as section 3.3 finds some fundamental issues with Facebook's Third-Party Fact-Checking Program. Finally, we look at the likely impact of the Climate Science Information Center, the relatively new initiative specific to combating climate misinformation.

3.1 Climate Misinformation Appearing in Facebook Advertising

In theory, climate change misinformation should never appear in Facebook adverts, but in practice this is far from the case. Here we briefly explore some known entities promoting climate misinformation through adverts.

United States

InfluenceMap has so far produced the best-in-class report on climate change denial in Facebook advertising, with its report covering the period from January to June 2020. This found that 51 adverts denying the existence of human-made climate change gained 8 million impressions in the timeframe. Using data on spend provided by Facebook, InfluenceMap estimated the total spend of these adverts to be around US$42,000.

InfluenceMap's report found that only one of the 51 adverts was discontinued by Facebook, with the other 50 allowed to run.

United Kingdom

The Stop Funding Heat team previously found and reported on climate misinformation in Facebook adverts in the UK in 2020. One set of adverts was produced by the controversial think tank and known climate denier, The Global Warming Policy Forum (GWPF). The worst of the 2020 ads are documented in this Medium article and Twitter thread. GWPF have continued to place adverts in 2021, with over GBP£2,500 spent to date.

Another set of adverts were produced by the private organisation "Eco Central UK". The Independent reported on this with DeSmog UK last year. The Eco Central UK ads can be found through this link, with GBP£4,250 spent to date. No ads have been spotted from Eco Central in 2021 so far.

Rest of World

We have not found any further work looking at climate misinformation in Facebook ads so far, but strongly suspect there is more that can be uncovered. This will likely be the focus of some further research by Stop Funding Heat later this year.

Transparency Issues with Adverts

One major problem with the climate misinformation adverts found so far is that, despite the mandatory "social or political ads" disclaimer on all of the adverts, the original source of the funding can be very hard to trace, with Facebook not obliged to provide that information. The Global Warming Policy Forum is a known climate denier entity, well documented by DeSmog UK. However, in the case of Eco Central UK, it was reported that the Facebook page was set up on behalf of a "private client" by a company called Consulate Communications Limited. As such, despite the disclaimer, nobody really knows who paid for the misinformation in this case.

In the US context, InfluenceMap notes in its report that, as climate misinformation has become an increasingly difficult thing for corporations to associate with, adverts are now usually spread by "think tanks and entities whose sources of funding are highly opaque".
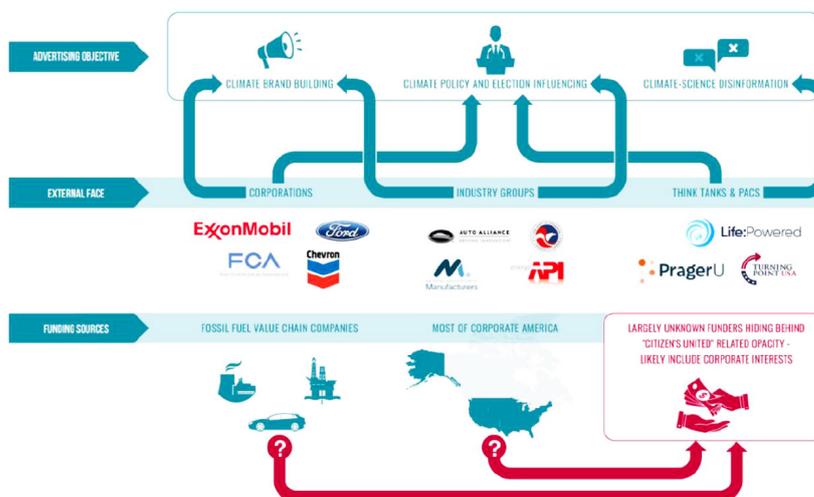
Figure 3: Funding sources for Facebook adverts are opaque despite disclaimers. Reproduced from InfluenceMap's report, Climate Change and Digital Advertising.

3.2 Misinformation Still Rife in Organic Content

While there is clear evidence of climate misinformation spreading through Facebook advertising, the story for organic (non-advertised) content is less clear. Since Facebook is taking a "reduce not remove" approach, merely pointing out the existence of climate misinformation is not sufficient to say there has been a failure of implementation. Instead, we would need to demonstrate the scale of climate misinformation on the platform.

Unfortunately, we were not able to find any such studies. However, there does exist a wide range of literature on how well Facebook is doing at curbing other forms of misinformation, such as on political issues, public health issues and hate speech. Given that Facebook's policies on climate misinformation are much weaker than on these topics (Part 2 of this report) and that it is not doing a good job at catching and preventing climate misinformation in paid advertising (previous section), it might be reasonable to infer that – if Facebook is doing poorly in implementing its misinformation policies in other areas – it is likely doing a poor job on organic climate misinformation.

This section covers the most significant studies that we found covering Facebook's success or failure in implementing its misinformation policies. We start with Avaaz's studies, which clearly outline the gap between what Facebook says it is doing and what actually it is doing. We then look at a very robust study from the The Institute for Strategic Dialogue (ISD) illuminating some key tactics of misinformation spreaders during EU elections. Following this, there are a number of studies that look at whether deceptive websites are on the rise on Facebook in the last four years (at best, they are as prevalent as they were in 2016). Finally, we look very briefly at Facebook's failure to implement even its most recent policy regarding anti-vaccination content.

We find that, overall, Facebook is falling short in all areas.

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Avaaz Studies Expose Extent of Misinformation and Facebook's Poor AI Response

Avaaz produced multiple studies between 2019 and 2020 on the Facebook algorithm's tendency to spread misinformation. The studies are all available through Avaaz's disinformation hub. Here we summarise the most salient findings.

Covid-19 Studies Expose the Extent of Misinformation on the Platform
Avaaz's August 2020 report, Facebook's Algorithm: A Major Threat to Public Health, and the April 2020 report, How Facebook Can Flatten the Curve of the Coronavirus Infodemic, are comprehensive empirical studies using CrowdTangle. The reports found large-scale failure on Facebook's part to contain Covid-19 misinformation:

- **Misinformation was rife:** There were an estimated 3.8 billion views of global health misinformation between May 2019 and May 2020.
- **Misinformation could be more prevalent than genuine science:** At the peak of the coronavirus infodemic in April 2020, content from the top 10 websites spreading misinformation had four times as many estimated views via the Facebook platform as the 10 leading health institutions, like the WHO and the CDC. While this was the worst month for this measure on record, it is clearly not acceptable to reach anywhere close to that level at all.
- **Misinformation was not being labelled:** Based on a sampled 174 pieces of misinformation, only 16% had a warning label added. Often shares of a fact-checked piece did not have a warning label added.
- **Much of the misinformation came from few, large sources:** 42 "super-spreader" pages generated 76% of all the websites' estimated views that were studied. Yet there was a failure to downgrade most of the repeat offenders despite it being a Facebook policy.
- **It was too easy to get around Facebook's AI:** Re-publishing content in full, or partially, or translating content to new languages were all effective ways of ensuring an originally fact-checked piece of content went undetected when re-posted.
- **Fact-checks were too slow:** "It can take up to 22 days for the platform to downgrade and issue warning labels on false content, even when Facebook's fact-checking partners as well as the World Health Organization and local health authorities, move at a significant pace to issue corrections."
- **Responses were worse for non-English speaking users:** Spanish, Portuguese and Italian speaking users received significantly fewer warning labels.
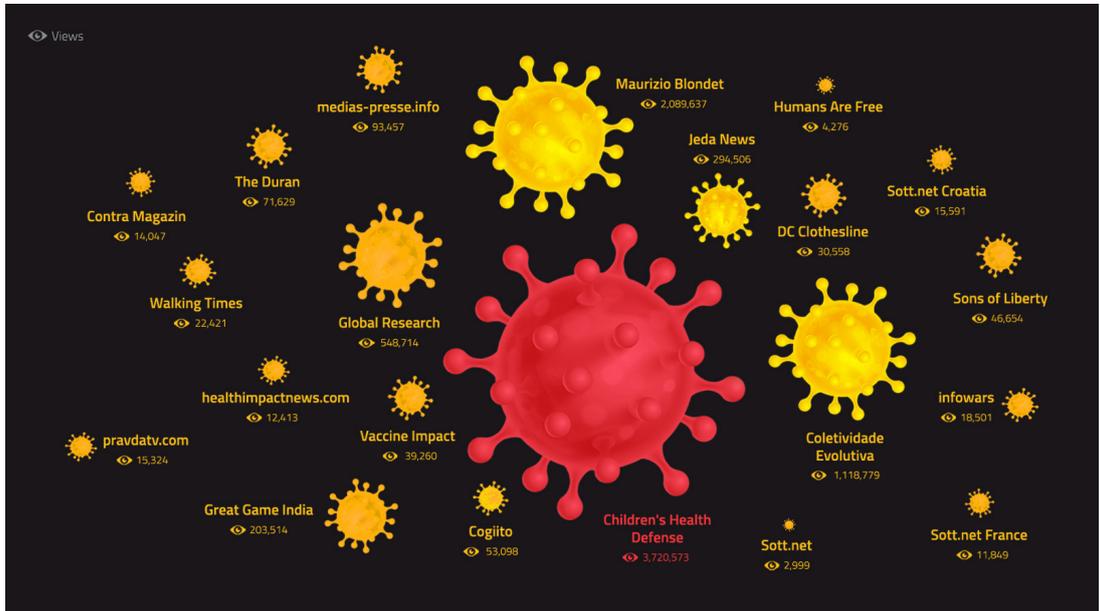
Figure 4: A fact-check occurring on the Children's Health Defense Facebook Page that was not subsequently applied on multiple other Pages. Reproduced from [Facebook's Algorithm: A Major Threat to Public Health](#).

The reports found, crucially, that there is "a gap between [Facebook's] promises and what is actually happening on the platform". The algorithm, designed primarily to grow Facebook's userbase and retain users, directly undermined Facebook's efforts to stop the spread of Covid-19 misinformation. Facebook does not share its whole strategy on combating misinformation, but the measures are strikingly similar to (or better than) those currently used to combat climate misinformation – providing free adverts to the WHO, curating a Covid-19 Information Center and showing notifications to users who engaged with harmful misinformation.

Political Misinformation Ahead of the US Election Exposes the Weaknesses in Facebook's AI-First Approach

Avaaz's October 2020 report, How Facebook's AI is Failing American Voters Ahead of Election Day[4], illustrates that the problem of misinformation is still widespread in US politics, while usefully highlighting some of the tactics used by disinformation spreaders. The report finds that 738 pieces of content that were previously fact-checked did not have a label applied due to very simple tweaks in the content, including "a different background image, slightly chang[ing] the post, crop[ping] it or writ[ing] it out".

Avaaz also found 119 "repeat offenders" – pages that shared misinformation at least three times – that have not apparently had clear action taken against them in line with Facebook's "repeat offender" policy.

Worse still, six days after informing Facebook about these posts and with one month still to the election, 93% of the posts discovered were still live without a fact-checking label.

This points towards Facebook not being organised well enough for the extent of misinformation on its platform, and exposes clear weaknesses in Facebook's ability to respond to coordinated misinformation campaigns.

Covid-19 Misinformation "Super-Spreaders" Were Identified Early in the Pandemic

An April 2020 report by NewsGuard found early indications of the extent of Covid-19 misinformation on Facebook. 31 English language "super-spreaders" had a combined fanbase of over 21 million users (note, there is likely duplication in this figure). As with the Avaaz reports, Newsguard found that many of the posts did not have a warning label and that, despite repeated offences, these super-spreaders were still allowed to post misinformation on the platform.

Crucially, NewsGuard also found that the posts that did have fact-check labels reached most of the audience before the label was implemented. Without going back to those users who had initially seen the content – a method named "correcting the record" by campaigners – this undermines the fundamental point of adding fact-check labels.

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[4] The full report is still only available on request. We have read this latest draft, but only provide the publicly available information in this report.

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Misinformation Tactics Are Becoming More Sophisticated – Case Studies from the EU Elections

The Institute for Strategic Dialogue (ISD) has been tracking misinformation tactics and narratives on Facebook with a number of tools and techniques. While its report, Click Here for Outrage, does not draw any empirical conclusions, its approach is very scientific, so the results are included in this section. The study found 18 case studies of malign information operations targeting the European parliamentary elections in 2019, spanning a number of tactics beyond just false information, such as false identities, false communities and false popularity. This is worrying, because these tactics are not necessarily included in our current definition of climate misinformation, and are even harder to study empirically than the topic of false information alone.

ISD's report strongly concludes that platforms have failed to self-regulate when it comes to election integrity and misinformation, with a "pressing need for liberal democratic governments in Europe to upgrade their … laws". It goes on to say: "Without clear definitions, laws and guidelines … we are relying on tech companies to create the norms for democracies in Europe from offices in Silicon Valley. Currently they are not meeting that challenge with satisfactory answers." Given the breadth and depth of ISD's study on these topics, this is a worrying sign regarding Facebook's performance in countering misinformation on its site.

"Iffy" Sites Known for Misinformation Spreading Are Still As Successful on Facebook as in 2016

The studies covered so far clearly show us that Facebook has a huge misinformation problem. But even if the most egregious lies are dealt with the majority of the time, Facebook will need to address ever more subtle forms of misinformation. Purported "news sites" can often weave a clever web of misinformation narratives, combining multiple themes into one. In many ways, this kind of misinformation may be more damaging, as it can be harder to detect.

Before looking at the details of the next three studies, we should bear in mind one main limitation of monitoring all content from "iffy" or "deceptive" sites; namely that the studies do not account for how much content from these sites is misinformation of some kind. Of course, not all Facebook content from these sites will contain misinformation. However, given Facebook does not provide detailed misinformation data to researchers at this stage, the measure does serve as a good proxy.

With that said, The Iffy Quotient is a painstakingly detailed data set measuring how much of Facebook and Twitter's top 5,000 URLs come from "Iffy" sites – that is, from news sources known for spreading misinformation. The Iffy Quotient uses NewsGuard and Media Bias/Fact Check to determine whether sites are "iffy" or not.

Browsing the Iffy Quotient for Facebook since 2016 shows us that, despite a drop in content from misinformation sources after 2016 and particularly in 2019, misinformation sources have rallied, particularly through late 2020 and into 2021 (Figure 5). It is unclear whether this is because misinformation sources have increased over time, or whether misinformation sources have found new tactics to spread on Facebook, despite its efforts to curb it. Either way, the data shows that Facebook is not winning the battle in reducing the misinformation on its platform.

Figure 5: The Iffy Quotient shows that the percentage of the top 5,000 URLs on Facebook coming from misinformation sources in early 2021 (blue line, blue background on the right) is about the same as in 2016 when records began (blue line, purple background on the left). Downloaded from https://csmr.umich.edu/ projects/iffy-quotient/ on 22nd April 2021.

More worrying, when using NewsWhip to count estimated engagement scores of posts, "Iffy" news sites are just as well engaged in 2021 as they were from 2016 to 2018 (Figure 6). Again, it is unclear why this sudden increase has happened, but it does raise the question of whether Facebook is genuinely equipped to combat misinformation on its platform when it is framed as "news".
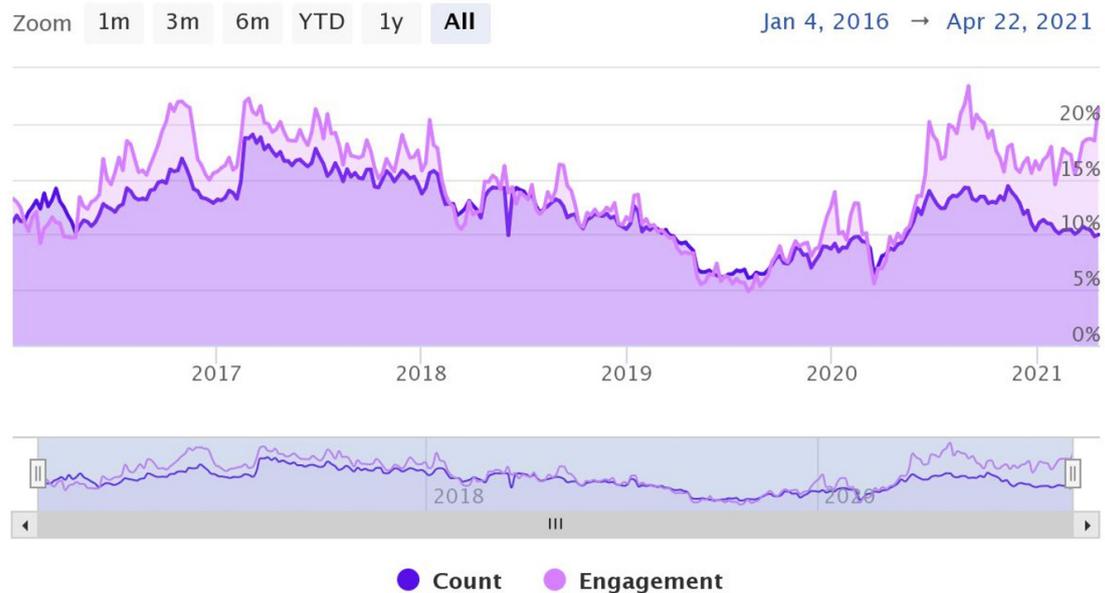
Facebook Engagement vs Count

Figure 6: The percentage of the top 5,000 URLs on Facebook, daily, that are Iffy (dark line, same as Figure 5) and the percentage of all engagements on Facebook from those same top 5,000 URLs that are Iffy (light line). Downloaded from https://csmr.umich.edu/projects/iffy-quotient/ on 22nd April 2021.

News Sites Employing Subtler Forms of Misinformation are Growing in Popularity on Facebook

Building on work from the Iffy Quotient, The German Marshall Fund (GMF) started producing quarterly data in October 2020 on social media engagement with deceptive sites that masquerade as journalism. Its reports distinguish between "false content producers" – those that NewsGuard determined repeatedly publish content that is provably false, and "manipulators" – those that NewsGuard determined fail to gather information responsibly.[5] The reports then use NewsWhip to gather data on interactions every quarter since the 2016 US election.

In October 2020, GMF found that "engagement with articles from outlets that repeatedly publish verifiably false information has increased 102% since the run up to the 2016 election … Irresponsible site engagements increased 296%".

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[5] To give an idea of who is in each dataset, the top five false content producers in Q3 by total interactions 2020 were Red State Observer, The Federalist, DJHJ Media, Wayne Dupree and WND. The top five manipulators were Fox News, The Daily Wire, Breitbart, The Blaze and The Western Journal. GMF point out that "Although the top five sites for each category are conservative-leaning, there are several left-leaning and apolitical sites within our deceptive sites."

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This means that engagement with false information via these sites has significantly increased since 2016. The growth of "false content producers" is proportionate to the growth in US sites in general on Facebook – meaning Facebook is failing to fix the issue. However, more concerning than this is the data indicating that interactions with manipulators is disproportionately on the rise – meaning Facebook is actively not fixing this particular issue.

Percent Change in Interactions Since the Third Quarter of 2016
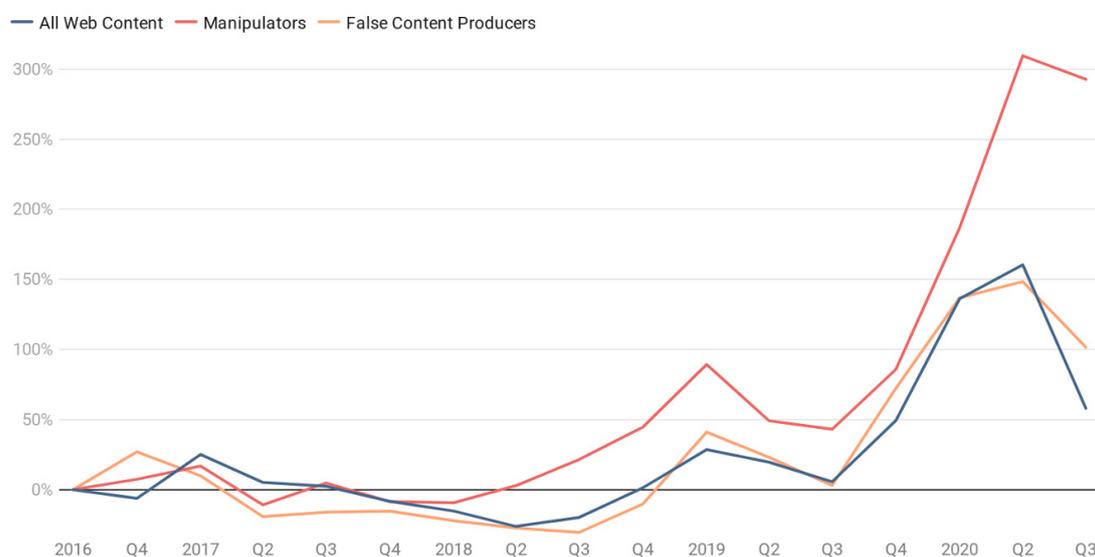
Figure 7: Percentage change in interactions compared to Q3 2016 of all web content in NewsWhip (500,000 sites) compared with the German Marshall Fund's "manipulators" and "false content producers" data sets. Source: GMF.

Put another way, engagement with "deceptive sites" is on the up whichever way you look at it, but it is the "manipulators" – those that do not repeatedly publish clearly false content, but do fail to gather and present information responsibly – that are beating Facebook's initiatives to curb misinformation. GMF points out several issues with Facebook's approach when it comes to solving this issue, including that "manipulators are less likely to be fact-checked false—since Facebook's fact-checking system tends to look for verifiably false content".

A second quarterly report published in January 2021 by GMF showed that, while Facebook interactions with all sites decreased after the run up to the 2020 Presidential election, the "manipulators" were still enjoying a disproportionate share of interaction growth since 2016.

Far-Right News Sources Enjoy Particularly High Engagement

Supporting the data from the two studies above, a study published by Cybersecurity for Democracy, also using NewsGuard and Media Bias/Fact Check, analysed the content from US news sources ahead of and after the US election. It found that "misinformation sources far outperform[ed] non-misinformation sources", and that far-right sources enjoyed more engagement on average.
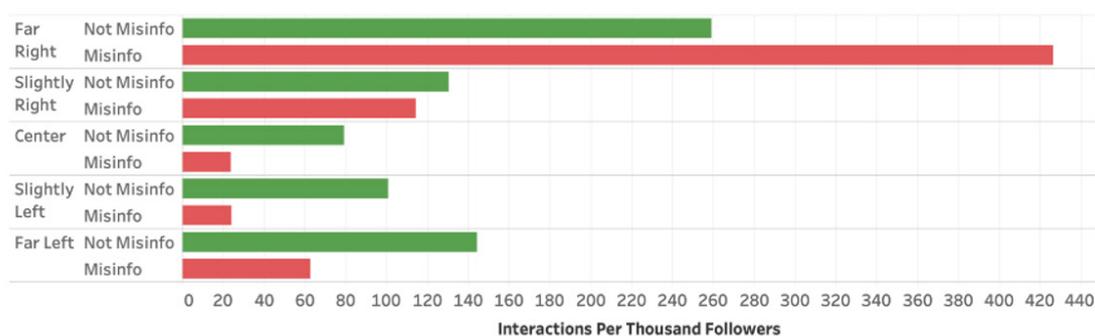
Figure 8: Misinformation "sources" — that is, sites that are known for spreading misinformation on a regular basis — outperformed non-misinformation sources, due to a failure to reduce spread of far-right misinformation in particular. Reproduced from Far Right News Sources on Facebook More Engaging.

Anti-Vaccine Content Still Prevalent on Facebook Even After Facebook Banned it

Finally, a recent study from EU DisinfoLab found that even directly after announcing a policy on removing vaccine misinformation, Facebook failed to sufficiently act on it. In February 2021, Facebook introduced a policy to remove all anti-vaccination content from its platform. However, it appears that Facebook is not acting fast enough on this, or possibly not acting at all when it comes to content posted before its announcement. A month later, in March 2021, EU DisinfoLab checked the status of the 74 IFCN fact-checked disinformation claims that spread widely through numerous Facebook posts in December 2020. Posts were live for 74% (a count of 55) of the fact-checked claims. 34 were flagged as misinformative, which directed to a fact-checking article. 21 were not labelled.

This evidence of failure to act quickly, or at all — and so recently — should give us pause whenever Facebook asserts a new policy and the impact it will have on its platform.

3.3 Extensive Issues with the Third-Party Fact-Checking Program

As previously covered, half of Facebook's current climate misinformation solution is the Third-Party Fact-Checking Program. Before we dive into some of the issues with the programme uncovered by researchers and journalists, we want to explain briefly how the process is supposed to work. Facebook explains this on its website:

1) Content is identified mainly through machine learning.
2) Fact-checks are then handed over to independent fact-checkers who review and apply a l label from "false", "altered", "partly false", "missing context", "true" or "satire". The fact-checkers can also select content independently, if they desire.
3) If flagged as "false news", Facebook acts by then adding disclaimers to the post, to anyone wanting to share the post, as well as by reducing the circulation of posts. Facebook does not explain how it "reduces circulation".

The rest of this section covers potential fundamental issues with the Third-Party Fact-Checking Program, starting with what we know about climate fact-checks specifically, and then exploring other big issues.

Low Occurrence of Climate Fact-Checks on the Platform

How much fact-checking occurs on climate change content? There is no way to know, but we did some investigation to try and find out. Facebook's full list of fact-checking partners lists one climate science specialist. Using this organisation's claim reviews and feedback pages, we found that climate change fact-checks by this single partner, originating from or checked specifically on Facebook, occur with a frequency of roughly one per month. However, general fact-checks of climate content that are likely to appear on Facebook occur at a frequency of around 1.5 per week.

Given that other fact-checkers are permitted to fact-check climate content, this is likely not the full extent of climate fact-checks on Facebook. However, from our research so far, other partners performing climate change related fact-checks are rare. Given the known prevalence of climate misinformation, the sum total of fact-checking is likely too low, even before discussing specific issues. Ultimately, we cannot know the full extent of climate fact-checking on the platform unless Facebook shares this information.

Two High Profile Climate Fact-Checking Failures

In June 2019 a media storm began as Facebook was reportedly found to make use of a "loophole" for its fact-checking programme in order to allow a fossil fuel lobby group, the CO2 coalition, to post its climate misinformation content more freely. The amount of mentions in the media can make a timeline quite difficult to ascertain, so we have documented what happened, hopefully as a help to all.

First Development – Washington Examiner Article Exempted from Fact-Check, August 2019

- An article was initially labelled as false in the Washington Examiner in August 2019 by a Facebook Third-Party Fact-Checking partner.
- However, this article was subsequently allowed to go ahead without fact-checking labels on Facebook.
- According to the Wall Street Journal this was due to a change of mind at Facebook, where they concluded the article represented opinion, not fact.
- This is considered a loophole because, while fact-checkers' decisions in the Third-Party Fact-Checking Program are binding on Facebook, Facebook still has the power to remove or add articles from the pool of items to be fact-checked. By arguing it is an opinion piece exempt from fact-checking, Facebook could circumvent the label that its own programme applied.

Second Development – The Daily Wire Fact-Check Removed, July 2020

Independent journalists Emily Atkin and Jedd Legum reported another instance of a climate change fact-check being removed in July 2020, this time from The Daily Wire. This case often gets confused in the media with the CO2 coalition case above, but they are distinct.

In this instance, since the original article was rated as "partly false", a paragraph at the start of the article stating the article had been fact-checked – with a link appended to the end to the original fact-check – was considered sufficient to remove the fact-check notification on Facebook. Unlike the loophole from August 2019, this action was a direct contravention of Facebook's own policy stating that a rating should only be removed if a fact-checker determines their initial rating was wrong, or the factual errors are corrected in the article. Of course, this is a technical point because, practically speaking, the misinformation spreads regardless of whether the action is taken as either a loophole or contravention of Facebook's policy.

The result of the removal of this fact-check was that the original post was shared nearly 50,000 times on Facebook, many times without the fact-check. Duplicates of the same news story were published on similar sites, such as Environmental Progress, with posts related to this on Facebook not containing the fact-check at all.

Third Development - Facebook Directly Questioned by Senators

Also in July 2020, and shortly before The Daily Wire case above, E&E news interviewed the Executive Director of the CO2 Coalition, who claimed that a Facebook staffer was specifically responsible for the removal of the fact-check in August 2019.

In response, Senators Warren, Carper, Whitehouse and Schatz wrote a letter to Facebook demanding clarification on climate science fact-checking, using the original Washington Examiner / CO2 Coalition case study from August 2019 as their example. Facebook failed to respond to the case in question, instead offering a general response:

"it has long been our guidance to independent fact-checkers that clear opinion content is not subject to fact-checking on Facebook. However, when someone presents content based on underlying false information as opinion — even in the form of an op-ed or editorial — it is still eligible for fact-checking".

However, this response was at odds with Facebook's official communication on the topic just one month before when, according to Andy Stone, Facebook's policy communications director, the policy of exempting opinion pieces for fact-checks had been in place since 2016. The article adds that Andy Stone said "The Washington Examiner post, originally published as an op-ed, clearly aligned with Facebook's definition of opinion content and added that fact-checkers should have been aware of that classification."

Fourth Development - Facebook Updates Guidance

Facebook issued updated guidance in August 2020:

"Finally, we want to clarify some confusion about our approach to opinion. This content is generally not eligible for fact-checking because we don't want to interfere with individual expression. But there is an important exception. If content is presented as opinion but is based on underlying false information - even if it's an op-ed or editorial - it's still eligible to be fact-checked. Why? Because presenting something as opinion isn't meant to give a free pass to content that spreads false information."

It seems that, after the two major stories landing in the summers of 2019 and 2020, Facebook did indeed change its policy, though they phrase it as a "clarification". The latest guidance now does cover the nuance better. A Poynter article also cites multiple fact-checkers saying that the issue has been cleared up, strongly implying that it was not clear to them beforehand.

Despite the original loophole from August 2019 now being part of Facebook's policy, The Daily Wire case from July 2020 is still unresolved. Finally, given other evidence, it is difficult to be confident that Facebook will stick to its new policy on fact-checking going forwards.

Facebook Is Not Taking Action Against Misinformation Spreaders

Several studies cited in the previous section suggest that action is not taken against repeat offenders as Facebook's policies state they should be. This is backed up by some recent reporting that we will mention briefly here. In August 2020, NBC and Buzzfeed published allegations from anonymous staff at Facebook around preferential treatment for "conservative" publishers. According to Buzzfeed "some of Facebook's own employees gathered evidence [that] Breitbart - along with other right-wing outlets and figures - has received special treatment that helped it avoid running afoul of company policy". According to the same article, "some misinformation strikes against Breitbart had been cleared by someone at Facebook seemingly acting on the publication's behalf". Both articles document several other alleged instances.

Another tactic misinformation spreaders are using to escape consequences is to totally rebrand or to proliferate many of the same pages spreading the same content. This latter tactic has been seen several times, as with Naturalnews.com in March 2020 that hosted Covid-19 misinformation on separate domains, such as clearnewswire.com and distributednews.com. Or as an entire "I Am A Texan" network appeared to do with protest misinformation in the US in summer 2020. These practices exploit the insufficient resources that Facebook is putting into the problem of misinformation on the platform.

A final tactic misinformation actors could use – as mentioned in the previous section – is to exploit the fact that Facebook enables misinformation spread by pages that look like news. In March 2019, Snopes published an investigation into political campaigns masquerading as innocuous local news sites on Facebook. Many of these sites were still active on Facebook right before the US election. Meanwhile, NewsGuard's July 2020 Misinformation Monitor shows how easy it can be with enough financial resources to set up misinformation pages promoting a political agenda: "[a] collection of pages (and affiliated three groups) has amassed a combined 8,659,159 followers without disclosing, to a single one of them, that the network is run by a political consultant."

The Political Fact-Checking Loophole

In a speech made to Washington DC in September 2019, Nick Clegg re-affirmed Facebook's policy is generally to exempt fact-checking politicians:

"We do not submit speech by politicians to our independent fact-checkers, and we generally allow it on the platform even when it would otherwise breach our normal content rules. Of course, there are exceptions. Broadly speaking they are two-fold: where speech endangers people; and where we take money, which is why we have more stringent rules on advertising than we do for ordinary speech and rhetoric."

This is corroborated by Full Fact, a UK fact-checking partner who, in its December 2020 report, stated that it cannot check certain political content. "For example", the report reads, "in October 2019 a regional UKIP Facebook page shared an image containing misinformation about vaccines. Under the terms of the ... programme, we were not able to give this content a rating ... despite its obvious potential for harm." The passage then goes on to say "Facebook do say that ... they can remove misinformation "which can contribute

to imminent physical harm or violence" [but] this is outside the scope of the Third-Party Fact-Checking programme and is at Facebook's discretion".

That Facebook took action against Donald Trump under the imminent harm rules is noteworthy, although there is a chance that the Facebook Oversight Board overturns this decision in the coming weeks.

In general, this exemption policy is coming under increased criticism, particularly given the high profile case of the US Capitol riot in January 2021. For example, A Poynter article from January 2021 cites several researchers criticising the policy.

Additionally, there is a scientific basis for changing this policy as fast as possible. Several papers cited from a previously referenced paper from section 1.4 demonstrate that "political elite cues are highly influential on public opinion". For example, in the US, the primary driver of changes in climate attitudes between 2002 and 2010 were statements from leaders of the Republican party. Meanwhile, the drop in acceptance of climate science in the US in the late 2000s was found to be driven by changes in political elite cues.

The combination of COP26 later this year and the lack of fact-checks on political accounts is a problem waiting to happen. If Facebook improves fact-checks across the platform, what is to stop high profile politicians from offering to publish climate misinformation or disinformation on their own pages instead, knowing no action will be taken there?

Can the Third-Party Fact-Checking Program Ever Keep Up with Coordinated Disinformation?

Finally, even if Facebook does fix these loopholes, there is a worry that such a fact-checking programme is incapable of keeping up with misinformation campaigns. In a recent essay in Technology Review backed up by interviews with former and current Facebook staffers, Karen Hao outlines two major arguments: First, Facebook does not have internal incentives to ever combat misinformation appropriately. But worse, even if it did, the misinformation strategy is "tenuous at best". Hao says:

"Misinformation and hate speech constantly evolve. New falsehoods spring up; new people and groups become targets. To catch things before they go viral, content-moderation models must be able to identify new unwanted content with high accuracy. **But machine-learning models do not work that way**. An algorithm that has learned to recognize Holocaust denial can't immediately spot, say, Rohingya genocide denial. **It must be trained on thousands, often even millions, of examples of a new type of content before learning to filter it out**. Even then, users can quickly learn to outwit the model by doing things like changing the wording of a post or replacing incendiary phrases with euphemisms, making their message illegible to the AI while still obvious to a human."

This report finds that Facebook is fundamentally struggling to implement appropriate levels and speeds of fact-checking. There is a strong likelihood that the approach is fundamentally broken, as Hao highlights, meaning there is a need for a comprehensive rethink of Facebook's approach and solutions.

3.4 Issues with the Climate Science Information Center

As previously covered, Facebook's latest information on the Climate Science Information Center is from its February 2021 blog post. While notable changes are being made – particularly in the prospective case of all users looking at climate content being directed there – without any hard evidence from Facebook, it is hard to surmise how effective this policy really is in preventing climate misinformation.

In its September 2020 blog post, Facebook stated that the Covid-19 Information Center has, so far, directed more than 2 billion people to information from health authorities, with more than 600 million people clicking through to learn more. The problem with topline figures like these is they are meaningless when not contrasted to other statistics. Facebook has not shared, for example, how many times public health misinformation has been viewed or clicked since the introduction of the Information Center.

Avaaz's April 2020 report illustrates what such a comparison could look like, as shown below. Although it is to be noted that this is not a like-to-like comparison, it is impossible to do such a comparison without further information from Facebook. The comparison is nonetheless striking, as Avaaz's figure of 117 million views did not even scratch the surface of the total extent of Covid-19 misinformation at the time.
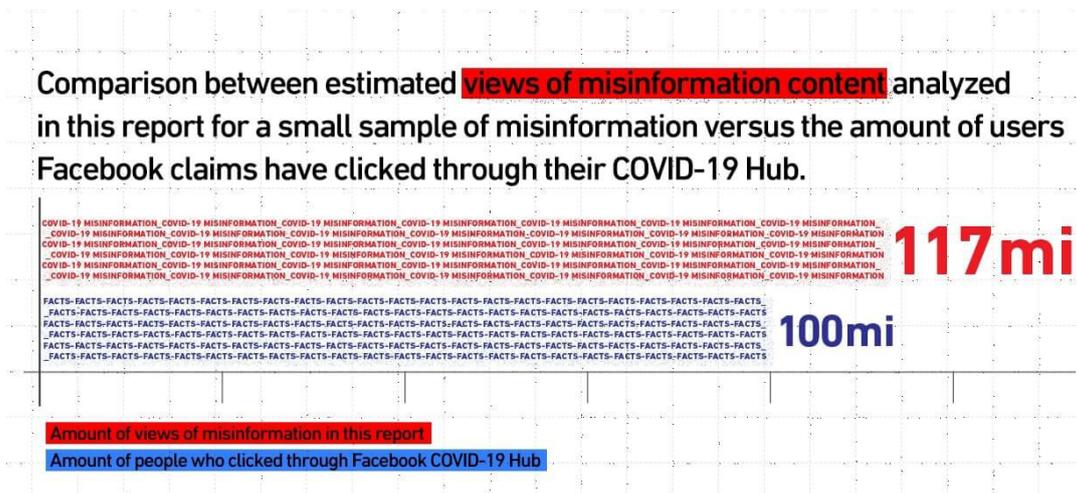

Figure 9: Avaaz demonstrates that views of misinformation can easily exceed click-throughs to one of Facebook's Information Centers. Reproduced from How Facebook Can Flatten The Curve of the Coronavirus Infodemic.

What's more, during the launch of the Information Center itself in September 2020, leading climate communication researcher John Cook likened the solution to "feeding a person poison while handing them a brochure about fresh vegetables". In a USA Today article from September 2020, which includes criticisms from several environmental groups, Cook said that, "At best, they have been slow to react to climate misinformation. At worst, they have actively reversed fact-checking efforts by climate experts, consciously enabling climate denial organizations to continue to push their misinformation". Although Cook is one of the scientists that helped implement Facebook's latest changes to the Information Center – adding debunked myths to the portal in line with the science on misinformation inoculation – it is notable that these recent changes do not

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fundamentally address the issues, as people visiting the Information Center are not necessarily shown the "debunk", or inoculation, against the myth they originally saw.

Finally, although the Climate Science Information Center is being rolled out to more countries, it still only exists in 16 in total. Even if the Information Center does become a perfect and global solution, which it is currently far from being, the speed of improvement is far too slow given the urgent need for climate change solutions.

PART 4 - WHAT NEXT?

4.1 Conclusions

Despite Facebook's positive stance on climate change misinformation, its related policies are weak. This report has found that climate change is rarely mentioned by Facebook publicly, and not once mentioned across the range of Facebook's policy documents. This is particularly striking when we realise that other important issues, such as political misinformation, public health misinformation and hate speech do all appear in the documents, sometimes several times.

Adding climate change to such policies would be an obvious step in the right direction, but it would not suddenly fix Facebook's fundamental issue with misinformation. This report has found climate misinformation on Facebook adverts. It has also uncovered Facebook's systemic problem of implementing its own Third-Party Fact-Checking Program consistently and effectively. There are also indications that Facebook is not sufficiently ready for emerging and evolving misinformation tactics in 2021 and beyond.

4.2 Recommendations

Recommendations to Facebook

Facebook must tackle climate change misinformation more actively by doing the following:

- **Update your policies**: Add climate change misinformation specifically to your Community Standards and Advertising Standards, and add climate change to your Community Standards reporting. This has been done with Holocaust denial, voter and census misinformation and with vaccine misinformation. Climate change, which is already causing 150,000 deaths annually, should be addressed too.

- **Open up**: One of your five core values is "be open". In line with this, we urge you to share your internal research on how misinformation spreads on your platform and the role of Facebook's recommendation algorithm in doing so. You must begin reporting regularly on the reach and engagement of climate misinformation on your platform, and on the number of climate fact-checks occurring, plus their subsequent impacts. Finally, you must take steps to open your API to researchers and journalists alike, so we can work on a level playing field to tackle this collective issue.

- **Stop profiting from climate misinformation campaigns**: Remove all climate misinformation on your advertising platform. Demonstrate that all climate change related advertising on your platform is genuinely checked for facts, including by humans, not just AI.

- **Take action against repeat offenders**: On both organic and paid content you must take decisive action against the pages, profiles and groups that spread climate misinformation regularly. Where possible, repeat offenders should be prevented from setting up new profiles, pages and groups.

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Recommendations to Activists

Activists or ordinary Facebook users can help Stop Funding Heat's ongoing investigations by sending us clear examples of climate misinformation on the platform to hello@stopfundingheat.info, or by tweeting us at @stopfundingheat. You can also visit our website at www.stopfundingheat.info to sign our petition to Facebook and find other ways to get involved.

Recommendations to Brands

Facebook's lack of action on misinformation of all kinds is toxic for democracy and climate action. Increasingly, users will be sceptical of adverts that appear on Facebook, particularly when appearing next to vaccine lies, climate denial or hate speech. We recommend that brands strongly consider a renewed advertising boycott of Facebook until clear improvements have been made.

In addition, advertisers must further lobby governments to ensure tough regulation of the platform; demanding that regulators have algorithmic audit powers so advertisers may see 'under the hood' as to who the adverts target live.

Recommendations to Investors

An increasing number of investment funds claim to integrate environmental, social and governance (ESG) risks into their decision-making, often with an emphasis on climate change risk. Yet many have Facebook amongst their largest holdings. This is due to the company's comparatively low carbon footprint, but it ignores Facebook's core business function and its impact on society. The evidence that has emerged in recent years must give pause to any investor concerned about climate change. We recommend that investors join advertisers in pulling their money from Facebook until safeguards are implemented to ensure re-investment would 'do no harm'. In the meantime, ESG funds could also use their shareholder influence with Facebook's largest advertisers to similarly withdraw funding.

Recommendations to Governments

Ensure regulation requires large platforms like Facebook to identify, analyse and assess 'any significant systemic risks stemming from the functioning and use made of its services.' Systemic risk should include mis- and disinformation about climate change. And, crucially, give regulators the power to independently audit and inspect Facebook's algorithms.

Note to Researchers

If you have performed or found any supporting or contrary research, or just want to discuss climate misinformation on Facebook in more detail, please get in touch with our lead researcher: sean@stopfundingheat.info, or tweet us @stopfundingheat

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ON THE BACK BURNER: HOW FACEBOOK'S INACTION ON MISINFORMATION
FUELS THE GLOBAL CLIMATE CRISIS