

To Whom it May Concern,

We write to you on behalf of the [MENA Alliance for Digital Rights \(MADR\)](#), a coalition of civil society organisations and actors committed to defending the rights and liberties of internet users in the Arab world.

We are formally raising the alarm regarding the continued dissemination of [state-sponsored disinformation advertising](#) by the Israeli government and affiliated entities across Google platforms, including YouTube, Google Search, Google Display & Video 360. For example, ads on [why the UNRWA couldn't be trusted](#), on why there is no famine in Gaza, [with photographs and video of open cafes and restaurants being presented as evidence](#). A recent wave launched the same day as [the publication of the Integrated Food Security Phase Classification \(IPC\) assessment](#), with ads showing in parts of Europe and North America.

These campaigns represent a material breach of Google's internal frameworks and external legal obligations. They disseminate misleading and deceptive claims about the humanitarian situation in Gaza, particularly with respect to the famine caused by the Israeli blockade of humanitarian aid. These ads directly undermine information integrity during an active humanitarian catastrophe in Gaza and contravene Google's own advertising policies and stated human rights commitments.

Since October 2023, MADR members have documented coordinated Israeli government advertising campaigns that deny or distort documented famine and starvation conditions in Gaza, despite consistent findings to the contrary by UN bodies and humanitarian organizations. The campaigns also misrepresent, delegitimize and smear international humanitarian aid efforts, target and defame UN officials and agencies, as well as disseminate misleading content at scale. Israel has spent approximately [\\$45 million USD](#) on advertising campaigns explicitly aimed at denying the man-made famine in Gaza.

Specifically, our members have documented ads that:

- **Explicitly Deny Famine:** Labeling verified reports of starvation as "fabricated" or "propaganda," directly contradicting IPC and UN data.
- **Defame Humanitarian Agencies:** Smearing UNRWA and other aid organizations to delegitimize their mandate and endanger their staff.
- **Target EU & Global Audiences:** Utilizing geopolitical targeting to influence public discourse in Europe and the US regarding humanitarian aid funding.

In the context of the genocide in Gaza, which was [determined to have been committed](#) by the UN Independent International Commission of Inquiry and recognized as [plausible](#) by the

International Court of Justice and numerous genocide experts and international bodies, the dissemination of paid disinformation does more than mislead. It **jeopardizes** the lives of civilians, undermines trust in [humanitarian institutions](#) and causes long-term damage to the integrity of the information ecosystem.

These ad campaigns directly violate Google's advertising policy, including prohibitions on misleading or deceptive claims, the omission of material context, and demonstrably false or unsubstantiated assertions related to public safety and humanitarian crises. This includes Google's policy barring ads that "[deceive users by excluding relevant information or providing misleading information.](#)" as well as restrictions on advertising that misleads users about public institutions or individuals. Furthermore, this content violates [Google's "Sensitive Events" policy](#), which explicitly prohibits content that capitalizes on, or shows a lack of sensitivity towards, natural disasters, conflict, or death.

Beyond internal policy compliance, Google [has publicly committed to the UN Guiding Principles on Business and Human Rights](#). These principles require companies to conduct **heightened due diligence** where there is a clear risk of severe harm. The ongoing humanitarian crises and mass civilian harm represent precisely such context.

Additionally, under the [EU Digital Services Act](#) (DSA), which designates Google as a Very Large Online Platform (VLOP), the company also has heightened obligations relating to political advertising transparency, systematic risk mitigation, and the amplification of state-sponsored disinformation, particularly where such disinformation relates to armed conflict or humanitarian emergencies.

The DSA applies insofar as these ads [target or reach users within the European Union](#). Under **Articles 34 and 35**, Google is obligated to mitigate "systemic risks," including the amplification of illegal content and foreseeable negative effects on civic discourse. State-sponsored disinformation regarding armed conflict is a recognized systemic risk that Google is currently failing to mitigate.

For all these reasons, and given the scale of the campaigns we identified, this continued dissemination of state-sponsored disinformation may expose Google to regulatory, legal and reputational risks.

Accordingly, we join our colleagues at Access Now in [their recommendations](#) responding to propaganda for war, particularly through online ads, and we call on Google to:

- Remove advertisements disseminating disinformation or harmful claims related to the humanitarian situation in Gaza.

- Conduct and publish the results of heightened due diligence on state-sponsored advertising, in line with the UN Guiding Principles, specifically, Principle 19 of the UNGPs on responsible disengagement and exit.¹
- Strengthen enforcement of existing advertising policies with respect to political and humanitarian disinformation.
- Increase transparency: Disclose the full scope of state-funded advertising related to this conflict, including precise spending figures.
- Develop a dedicated policy on armed conflict, through robust consultation with affected communities, legal and policy experts, and in respect of International Human Rights Law and International Humanitarian Law. Such a policy should include specific details, for example, clearly defined and consistently enforced standards for suspension of ad accounts.

We would welcome engagement directly with Google's teams to share further documentation to support our argumentation.

We look forward to your response and your concrete steps to ensure Google's platforms do not facilitate the dissemination of disinformation during a plausible genocide.

Sincerely,

The MENA Alliance for Digital Rights (MADR)

¹ In order to prevent and mitigate adverse human rights impacts, business enterprises should integrate the findings from their impact assessments across relevant internal functions and processes, and take appropriate Action.

(a) Effective integration requires that:

(i) Responsibility for addressing such impacts is assigned to the appropriate level and function within the business enterprise;

(ii) Internal decision-making, budget allocations and oversight processes enable effective responses to such impacts.

(b) Appropriate action will vary according to:

(i) Whether the business enterprise causes or contributes to an adverse impact, or whether it is involved solely because the impact is directly linked to its operations, products or services by a business relationship;

(ii) The extent of its leverage in addressing the adverse impact.