

# HEAT

Harmful Environmental Agendas & Tactics

Logically.

EU DISINFO LAB

June 2025

## HEAT: HARMFUL ENVIRONMENTAL AGENDAS & TACTICS

A look at France, Germany, and the Netherlands

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*The HEAT project is supported by the European Media and Information Fund (EMIF), managed by the Calouste Gulbenkian Foundation and the European University Institute.*

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## 1. EXECUTIVE SUMMARY

This report presents the final findings of the **HEAT (Harmful Environmental Agendas & Tactics)** project, which investigated climate-related misinformation, disinformation, and malinformation (MDM) across **Germany, France, and the Netherlands**—three European Union (EU) member states **strategically selected to reflect linguistic, political, and media-system diversity across the EU, as well as distinct disinformation threat profiles**. Together, they capture a range of challenges confronting policymakers, civil society, and other actors engaged in climate policy communication. The research shows how false or misleading narratives about climate change are seeded, adapted, and amplified across digital ecosystems, undermining trust in science, policy, and democratic institutions.

Focusing on publicly available user-generated content **X, Facebook, Telegram, and fringe sources**, the project analysed climate disinformation through the lens of four pillars: **Conspiracy Milieu, Culture War and Partisan Discourse, Hostile State Actors (HSAs), and Big Oil-aligned Campaigns**. Key insights include:

- **Conspiratorial narratives, especially around geoengineering and HAARP, were present and prominent across all three countries**, often transcending political alignment and acting as gateways to broader distrust.<sup>1</sup>
- **Narratives framing climate action as authoritarian or elitist** have overtaken outright science denial, resonating widely across polarised and mainstream spaces alike.
- **Russia-linked media and Telegram ecosystems (e.g., Portal Kombat)** played a documented role in amplifying content, often through localised rebranding and low-cost distribution tactics.
- While **Big Oil corporate attribution was limited**, some narratives aligned with fossil fuel interests, especially those in opposition to green transitions.

The HEAT project shows that **climate disinformation undermines democratic resilience and evidence-based policymaking** by fuelling distrust, polarisation, and resistance to climate action. This report **urges EU institutions** to recognise it under the Digital Services Act (DSA), either explicitly as a **systemic risk** or as part of existing risks to democracy, public health, and civic discourse. **Platforms are currently exploiting this lack of clarity on the status of climate disinformation to avoid action. Very large online platforms** must be held to the same standards of accountability with regard to this systemic risk as are applied to other systemic risks.

The findings reflect a shifting disinformation landscape where climate debates are increasingly entangled with conspiracy theories, culture war rhetoric, foreign influence, and systemic distrust. This report offers an evidence base for targeted responses and lays the groundwork for monitoring future campaigns around climate, energy, and democratic legitimacy in Europe.

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<sup>1</sup> High-Frequency Active Auroral Research Program

## 2. INTRODUCTION

Climate change disinformation remains one of the most pressing threats to evidence-based policymaking, environmental governance, and democratic resilience in the EU. As climate policies expand in scale and ambition, they have increasingly become the focus of targeted malign influence operations, both foreign and domestic, designed to delay climate action, erode trust in democratic institutions, and polarise public discourse. The HEAT project investigates this phenomenon across three EU member states, Germany, France, and the Netherlands, by mapping the evolution of climate-related MDM narratives across digital ecosystems. These three countries were selected to reflect linguistic, political, and media-system diversity within the EU, as well as distinct disinformation threat profiles that collectively offer insight into a wide spectrum of risks and narrative strategies.

Commissioned under the European Media and Information Fund (EMIF), the HEAT project was established with four primary objectives. First, to identify key climate-related MDM narratives circulating within each national context, including both mainstream and fringe discourse. Second, to map the actors responsible for disseminating or amplifying these narratives, including political influencers, ideologically driven outlets, corporate voices, and foreign state-linked media. Third, to assess how these narratives evolve over time—especially in response to policy developments, geopolitical events, or major climate incidents—by analysing their spread, resonance, and emotional framing. Finally, the project aims to inform counter-disinformation strategies by generating evidence-based recommendations tailored to policy, civil society, and communication stakeholders across the EU.



Initially launched in October 2024 and concluding in June 2025, the HEAT project's core data collection window spanned 01 October 2024 to 30 April 2025, allowing for comprehensive monitoring of climate-related MDM narratives across platforms and countries. The final phase of the project, including analysis, validation, and production, took place in May and June 2025, culminating in this report.

The selected countries represent three strategically distinct disinformation environments. Germany, an EU climate policy leader, faces narrative warfare on both energy security and regulatory overreach. France has emerged as a flashpoint for elite-targeted conspiracy theories, often blended with cultural identity and sovereignty themes. The Netherlands, meanwhile, stands at the intersection of agricultural populism, English-language conspiracy crossover, and persistent domestic opposition to EU climate policies.

This report builds upon an earlier mid-point investigation and incorporates both qualitative and quantitative analysis from Open Source Intelligence (OSINT) investigations, actor-based and keyword-based monitoring, and narrative clustering experiments. It leverages data from multiple platforms, including *Telegram* channels, *Facebook* pages, *X* posts, and alt-media sources, combined with human-led analysis of amplification tactics and resonance. The structure of the report follows the Four Pillars of Climate Disinformation identified in early scoping:

- 1) Conspiracy Milieu,
- 2) Culture War and Partisan Discourse,
- 3) HSAs, and
- 4) (4) Big Oil Campaigns.

Through this framework, the HEAT project delivers a cross-platform, cross-national investigation into the strategic deployment of climate disinformation in Europe. By focusing on both the actors behind and the narratives driving these campaigns, the project aims to illuminate how digital influence operations attempt to shape public perception of environmental policy. HEAT generates insights that may support the recognition of climate disinformation as a potential systemic risk under the EU's DSA and contribute to evidence-based risk assessments. It is also designed to inform enforcement approaches, policy development, civil society strategies, and media literacy efforts across national and EU levels.

The following section outlines the methodological framework used to capture, cluster, and assess climate MDM narratives across the selected countries and platforms.

## 3. METHODOLOGY & DATA COLLECTION

This investigation employed a hybrid analytical framework integrating qualitative and quantitative methods, OSINT tradecraft, and Logically's proprietary tooling to identify and track climate-related MDM narratives across Germany, France, and the Netherlands. The collection window spanned from 01 October 2024 to 30 April 2025, ensuring coverage of the pre- and post-winter political and media cycles. The approach combined actor-based and Boolean-based collection strategies, applied across major social and digital platforms, and was anchored in a multi-layered validation process performed by subject matter experts.

### 3.1 Analytical Framework

The analytical framework draws on widely recognised models for threat analysis and OSINT ethics, including:

- **DISARM Framework** – for structured threat attribution and narrative classification.
- **MITRE ATT&CK for Information Operations** – to map tactics, techniques, and procedures (TTPs).
- **Observatory for OSINT Guidelines** – for ethical and best-practice open-source methods.
- **Phased Tactical Analysis of Online Operations** – to structure time-based campaign analysis.

These models were applied in combination with Logically's in-house AI tools to detect Coordinated Inauthentic Behaviour (CIB), surface high-risk narrative clusters, and quantify resonance metrics such as reach, amplification, and emotional framing.

### 3.2 Geographic Focus and Actor Selection

The research used a dual-stream data collection strategy:

1. **Actor-based collection using curated seed lists of accounts relevant to national discourse in each country.** Seed selection was based on:
  - Self-identification or stated location.
  - Topical focus on climate or energy discourse.
  - Prior engagement in MDM networks.
2. **Keyword- and Boolean-based dashboards, designed to capture a broader landscape of MDM.** These included iteratively refined queries based on the Computer Assisted Recognition of Denial and Skepticism (CARDS) taxonomy and informed by real-time monitoring trends. Where feasible, geo-targeting and language-specific filters were applied to ensure national specificity.

The core platforms included *X* (formerly *Twitter*), *Facebook* (public pages), and *Telegram* (public channels). Additional sources, such as fringe blogs, partisan media outlets, and multimedia platforms, were analysed to understand narrative migration and cross-platform dynamics.

### 3.3 Data Processing and Narrative Clustering

After ingestion, the data was passed to Logically's Data Science team. Topic models, both supervised and unsupervised, were used to cluster narratives. When outputs lacked nuance, the OSINT team applied manual classification to ensure alignment with the four-pillar framework.

**Narrative resonance** was assessed using:

- **Quantitative indicators:** post volume, reach, and engagement metrics.
- **Qualitative insights:** sentiment analysis, context, and ideological alignment.

Where applicable, analysts investigated CIB indicators such as:

- Coordinated timing
- Repetitive messaging
- Shared URLs or hashtags
- Cross-posting across *Telegram* and X

### 3.4 Analyst Workflow and Validation

Logically analysts played a central role in content interpretation, classification, and cross-validation. Their workflow included:

- Thematic labelling of content clusters using the Four Pillars framework:
  - (1) Conspiracy Milieu,
  - (2) Culture War & Partisan Discourse,
  - (3) HSAs, and
  - (4) Big Oil Campaigns.
- Narrative verification using linguistic and contextual clues, with attention to sarcasm, coded language, and cultural references.
- Identification of CIB based on synchronised posting patterns, shared metadata, and known network ties.

This human-in-the-loop process allowed for the contextual nuance and geopolitical awareness that automated systems alone often cannot provide.

### 3.5 Closing Note on Methodology

This methodology provides a structured and scalable approach to tracking climate disinformation across three European countries. By combining automated detection with expert-led analysis, the research ensured contextual precision and thematic consistency across a fragmented media ecosystem. For a deeper understanding of the technical process, data architecture, platform breakdowns, and fact-checking summaries, Annex A includes expanded materials covering:

- The full **seven-stage implementation process** used by Logically (Section 11.1)
- **Boolean-based collection strategies** and their limitations (Section 11.2)
- A breakdown of **prioritised platforms and source ecosystems** (Section 11.3)
- Examples of **Boolean Search Queries** used in the analysis (Section 11.4)
- Methodological and data **access constraints** (Section 11.5), and
- Detailed **fact-check summaries and rebuttals** of key cross-country disinformation narratives (Sections 11.6 and 11.7)



## 4. COUNTRY-LEVEL ANALYSIS: GERMANY

### 4.1 Executive Summary of Findings

Between 1 October 2024 and 30 April 2025, climate-related disinformation in Germany coalesced around three dominant and overlapping narrative clusters: **Narratives “Undermining Climate Science and Consensus”**, **“Attacks on Green Policies and the Energy Transition”**, and **“Populist, Anti-Elite, and Conspiratorial Messaging”**. These narratives were amplified through conspiratorial, partisan, and foreign-aligned actors. *X* was the leading platform for real-time virality and hashtag manipulation; *Facebook* provided credibility through pseudo-academic framing; and *Telegram* served as the core infrastructure for fringe theories, long-form content, and emotional narrative layering.

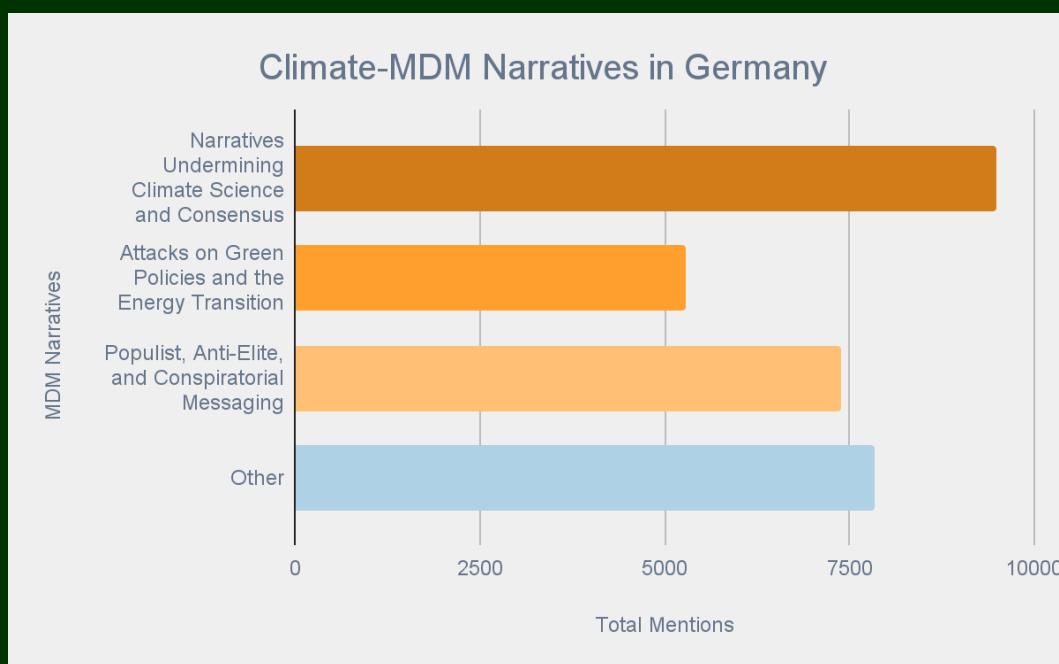


Figure 1. Top three climate-MDM narratives in the German dataset.

#### Narrative Cluster 1. Narratives Undermining Climate Science and Consensus

This was the most prominent theme observed during the monitoring period. These narratives rejected the scientific consensus on anthropogenic climate change, often portraying CO<sub>2</sub> as harmless or even beneficial. Institutions like the IPCC were depicted as politically compromised or engaged in deliberate misinformation, reinforcing public distrust in climate science and promoting false equivalence between peer-reviewed research and pseudoscience. **Figure 2**, which outlines the platforms and amplification strategies used.

Platform	Amplification Strategy
Facebook	Pseudo-academic organisations like EIKE disseminated 'alternative science', questioning climate models and IPCC data.
Telegram	Denialist influencers shared long-form posts framing climate change as a hoax orchestrated for social control.
X	Hashtags such as #KlimaLüge and #Heizungsgesetz framed climate science as political manipulation. Users invoked technically true claims (e.g., "CO <sub>2</sub> is essential to life") to downplay climate risk. <sup>2 3</sup>

Figure 2. Disinformation narratives amplified via Conspiracy Milieu and HSA channels (Pillars 1 & 3).

### Narrative Cluster 2. Populist, Anti-Elite, and Conspiratorial Messaging

This was the second dominant narrative during the monitoring period. These narratives framed climate action as a globalist agenda designed to erode national sovereignty, restrict individual freedoms, and control populations through fear and fabricated crises. The messaging often relied on emotionally charged rhetoric and conspiratorial framing, positioning elites, international organisations, and green parties as authoritarian actors pursuing power under the guise of climate policy.

Platform	Amplification Strategy
Facebook	Dissemination of conspiracies involving HAARP, weather manipulation, and climate "lockdowns" via highly active channels; content often referenced Tesla or DARPA to lend pseudo-scientific credibility.
Telegram	Denialist influencers shared long-form posts framing climate change as a hoax orchestrated for social control.
X	Use of hashtags such as #KlimaPsychose and #Agenda2030 to anchor quote threads accusing elites of exploiting climate narratives to instill fear and consolidate power. <sup>4 5</sup>

Figure 3. Disinformation narratives from Populist, Anti-Elite, and Conspiratorial Messaging amplified via Conspiracy Milieu and HSA channels (Pillars 1 & 3).

### Narrative Cluster 3. Attacks on Green Policies and the Energy Transition

This was the third most dominant narrative during the monitoring period. These narratives targeted Germany's *Energiewende* (Energy Transition), low-emission heating laws, and carbon pricing measures, portraying them as threats to economic stability, national industry, and working-class livelihoods. The

<sup>2</sup> Translated: Climate lie

<sup>3</sup> Translation: Heating act

<sup>4</sup> Translated: Climate psychosis

<sup>5</sup> United Nations, [Transforming Our World: The 2030 Agenda for Sustainable Development](#), accessed 11 June 2025.

messaging emphasised fears of rising costs, job losses, and energy shortages, often wrapped in populist rhetoric that framed climate policy as elitist, impractical, or socially unjust.

Platform	Amplification Strategy
<i>Facebook</i>	Narratives used infographics and visual data (e.g., electricity prices, unemployment rates) to portray the energy transition as a direct threat to economic stability and industry.
<i>Telegram</i>	Emotional stories warned of the 'Dunkelflaute', blending energy critique with populist fear. <sup>6</sup>
<i>X</i>	AfD-aligned accounts circulated hashtags like #Klimadiktatur and #Grünerwahn, framing green policies as economically devastating, with warnings of blackouts and mass impoverishment. <sup>7 8 9</sup>

Figure 4. Disinformation narratives attacking Green Policies and the Energy Transition amplified via Culture War, Partisan Discourse, and Big Oil Campaigns (Pillars 2 & 4).

### Cross-Platform Dynamics

*X* led in volume and virality, especially around legislative flashpoints and election periods. On **Facebook**, denialist and economically partisan narratives were amplified via public pages, likely lending these messages a perception of legitimacy and local trust. **Telegram** served as a key hub for the origination and early development of conspiracy narratives, offering an unmoderated environment where content could gain traction before being cross-posted by users to other platforms.

### Temporal Patterns and Activity Spikes

In Germany's information space, there were sharp disinformation surges between **January and March 2025**, driven by backlash to the proposed climate neutrality amendment, narratives around winter energy shortages, and economic anxieties related to the *Heizungsgesetz*. Content volume peaked during the federal election period and increased again following regional blackouts in Spain and Portugal, which were exploited by anti-transition actors to stoke fears about energy reliability.

### Rhetorical Strategies and Stylistic Features

MDM content was marked by:

<sup>6</sup> Translated: Period of low solar and wind energy generation

<sup>7</sup> The Alternative für Deutschland (Alternative for Germany) is a German political party founded in 2013. It is known for its critical positions on immigration, climate policy, and European integration, and has been described by analysts as right-wing to far-right.

<sup>8</sup> Translated: Climate dictatorship

<sup>9</sup> Translated: Green delusion

- **Sarcasm and ridicule** of climate science (e.g., memes mocking temperature charts).
- **Pseudoscientific tone** using graphs and ‘alternative data’ from sources like *EIKE*.
- **Coined language** like ‘*Klimawahn*’ and ‘*Klima-Gleichschaltung*’ presenting climate concerns as mass psychosis.<sup>10</sup> <sup>11</sup>
- **Populist polarity**, especially on *Telegram*, framed ordinary citizens as victims of elite manipulation.
- **Quote-post hijacking** on *X* was used to insert conspiratorial claims into mainstream discussions.
- **Emotive memes** portrayed Green Party policies as authoritarian and blamed them for causing societal decline.

### Operational Techniques and Dissemination Patterns

Germany’s climate disinformation ecosystem deployed systematic and recurring tactics designed to maximise narrative amplification and audience impact:

- **Hashtag seeding and viral slogan amplification** (e.g., #Klimadiktatur, #Heizungsgesetz) orchestrated by AfD-adjacent influencers.
- **Narrative incubation** on *Telegram*, with long-form theories later echoed by *Facebook* and alternative press.
- **Copypasta dissemination** from Russia-linked outlets (*RT.de*, *Pravda DE*), later replicated by partisan pages.
- **Mirror site creation** circumvented *Russia Today (RT)* bans through domain cloning (e.g., CopyCop/Storm-1516 infrastructure).
- **Temporal targeting** coincided with national legislative debates and seasonal energy fears to increase impact and emotional resonance.

## 4.2 Platform-Specific Breakdown

### Platform Summary

As illustrated in **Figure 5**, the German dataset’s narrative volume was dominated by *X*, with 48,542 posts, followed closely by *Facebook* public pages, which totalled 41,869 posts. *Telegram*, despite a lower post volume (2,419 posts), played a disproportionately larger role in hosting conspiratorial narratives, particularly those involving geoengineering, HAARP, and elite manipulation.

<sup>10</sup> Translated: Climate madness

<sup>11</sup> Translated: Climate indoctrination/conformity

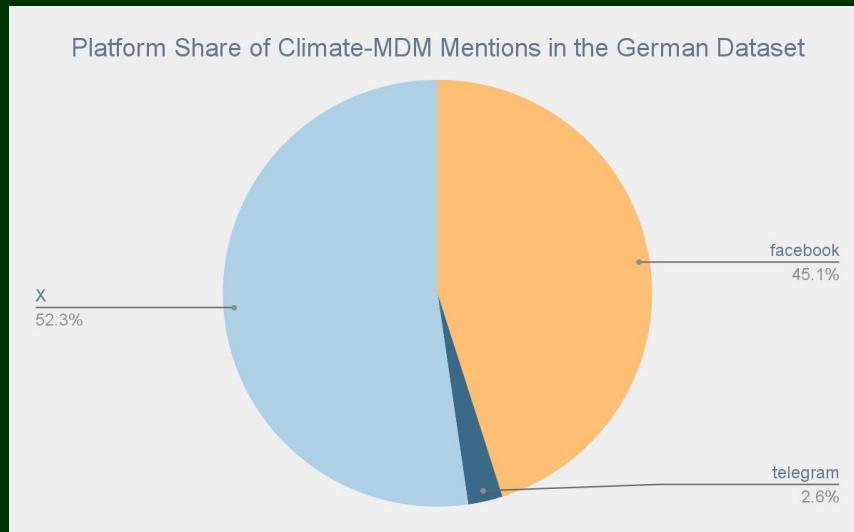


Figure 5. Distribution of climate disinformation posts by platform (Germany, Oct 2024–Apr 2025).

The platform distribution reflects not only engagement volume but also differences in narrative function and style. *X* was the primary venue for rapid, politically reactive content, often driven by partisan influencers and viral hashtags. *Facebook* served as a space for persistent narrative reinforcement, where pseudo-academic climate scepticism circulated through high-credibility-seeming pages like *EIKE*. *Telegram* operated more as a deep engagement zone, where emotionally charged and ideologically extreme content could circulate without moderation. These platform-specific dynamics help explain the imbalance in post counts and the varied tone and intensity of climate disinformation across Germany's digital environment.



#### Fact Check:

According to Germany's Building Energy Act (Heizungsgesetz), only heating systems over 30 years old must usually be replaced, with subsidies available for climate-friendly alternatives. (See Annex 11.6)

**X**

*X* was a key platform for disseminating politically charged climate narratives, especially those targeting Green Party leadership and the legitimacy of climate science. The three most prominent clusters focused on climate denial, attacks on Germany's energy transition, and criticism of the Green Party, and accounted

for over 2,000 posts. Posts frequently framed the Federal Minister for Economic Affairs and Climate Action and the Federal Foreign Minister as economically destructive figures, accusing them of driving deindustrialisation through misguided green reforms. Hashtags like #KlimaDiktatur explicitly frame environmental policy as authoritarian, while others like #Heizungsgesetz and #HabeckRücktritt were used to mobilise opposition to specific legislation and political figures.

Climate denial was often expressed through sarcasm and ridicule. User accounts questioned the scientific basis of climate change by mocking rising temperatures, comparing current events to historical climate fluctuations, and recycling content dismissing IPCC warnings. Others amplified scepticism around Germany's climate neutrality goals, claiming they would lead to mass poverty, energy instability, and global irrelevance. Posts drew rhetorical links between climate and COVID-era restrictions, suggesting both crises were elite fabrications designed to justify control. Unlike content on *Telegram*, content on *X* was more succinct and politically direct but still emotionally resonant, often amplified by AfD-affiliated figures and partisan influencers with high engagement and reach.



### Fact Check:

*Signatories of the petition declaring 'no climate emergency' mostly lack climate specialisation. (See Annex 11.6)*

## Facebook

On *Facebook*, opposition to climate policy was often framed through the lens of institutional distrust and far-right narratives. One of the most prolific sources was the page of *EIKE*, which consistently pushed climate scepticism and delegitimised mainstream climate science. These posts aligned themselves with political actors like the AfD and attacked the concept of anthropogenic climate change, accusing scientific bodies of fabricating data. Much of the content from *EIKE* (responsible for over 1,200 matches in the dataset) used a pseudo-academic tone to lend credibility to conspiracy-adjacent claims, often mocking climate targets and linking renewable energy to societal collapse or ideological brainwashing.

Additionally, highly engaged posts on *Facebook* portrayed climate activism as either a scam or a cult. Commenters accused Green Party figures and environmentalist journalists of deceit or manipulation, often invoking globalist conspiracies. These posts echoed themes visible on other platforms but resonated especially on *Facebook* through the use of familiar institutions like *EIKE* and pages aligned with nationalist or populist ideology.

### **Telegram**

*Telegram* was central in circulating conspiratorial climate narratives during the monitoring period. Users promoted theories that climate change is not a natural phenomenon but a product of deliberate manipulation by global elites using tools like chemtrails, geoengineering, and HAARP. One topic alone, focused on chemtrail conspiracies, generated over 770 *Telegram* posts, making it one of the most active clusters on any platform. Posts claimed that skies were being intentionally sprayed to poison the population or block sunlight, often referencing depopulation agendas or United Nations (UN)-backed climate initiatives. Others described HAARP as a weapon used to trigger floods, heat waves, or earthquakes to justify authoritarian policies. These narratives frequently blended in concerns about 5G and electromagnetic interference, portraying climate phenomena as orchestrated threats to public health and sovereignty. Beyond weather manipulation, users cast doubt on the legitimacy of climate science and policy, with hundreds of posts portraying environmentalism as a secular religion. Messages mocked scientists, framed climate action as ideological extremism, and described green reforms as part of a broader effort to control society. Many narratives recycled COVID-era distrust, positioning climate change as the next manufactured crisis. *Telegram*'s lack of moderation and support for long-form content made it ideal for emotionally charged, conspiratorial narratives, cementing its role as a key vector of extreme climate disinformation in Germany.

## **4.3 Dominant Narratives by Pillar**

### **Pillar 1: Conspiracy Milieu**

Conspiratorial climate narratives were among the most active and emotionally charged in the German digital ecosystem during the monitoring period. Across platforms, particularly on *Telegram* and *Facebook*, users advanced the belief that climate change was an artificially manufactured crisis orchestrated by global elites. Theories about geoengineering, HAARP, and chemtrails were especially prolific; content accusing governments and secretive institutions of deploying weather manipulation technologies to engineer droughts, floods, or heatwaves circulated in over 1,100 combined posts.

Some claimed these operations aimed to justify authoritarian climate policies or even depopulation agendas. Long-form posts and videos frequently referenced figures such as Nikola Tesla, DARPA, and the founder of the World Economic Forum (WEF), alleging that electromagnetic weapons were already in use to create 'engineered disasters'. This narrative cluster also recycled earlier COVID-era conspiracies, portraying the pandemic and climate policy as sequential steps in a broader elite strategy to impose surveillance and digital control. Over 400 posts directly linked climate change to previous pandemic 'hoaxes,' describing both as pretexts for the loss of civil liberties. Climate science itself was widely delegitimised: more than 1,200 posts described it as ideologically driven or outright fraudulent, with climate models labelled 'manipulative' and mainstream scientists portrayed as either complicit or silenced. A prevalent motif presented climate policy as a psychological operation—a form of mass conditioning aimed at instilling fear, obedience, and conformity. This rhetoric often included dismissive language such as 'Klimawahn' and 'Klimapsychose', suggesting that concern over climate change was a

symptom of collective mental manipulation. These frames were reinforced by hashtags like #Klimadiktatur and emotive comparisons to totalitarian regimes, aligning green reforms with broader narratives of censorship, political persecution, and social control.



Figure 6. Top Climate-Related hashtags in Germany during the collection period (Logically Intelligence).

In sum, the conspiratorial milieu in Germany was not a fringe phenomenon but a cross-platform ecosystem that blended anti-elitist sentiment, pseudo-science, and ideological defiance. These narratives were particularly potent on unmoderated platforms like *Telegram*, but also migrated to *Facebook* pages and *X* accounts associated with far-right actors and media outlets, where they amplified distrust in democratic institutions and environmental governance.

### Pillar 2: Culture War and Partisan Discourse

The discourse around Germany's climate policy during the monitoring period was shaped heavily by populist backlash and ideological framing, which cast environmentalism as an elite-driven project divorced from the economic realities and cultural values of ordinary Germans. Far-right actors, especially the AfD and affiliated influencers, positioned themselves as defenders of national interest, industrial strength, and traditional identity against the perceived threat of 'Green ideology.' This narrative cluster, which appeared in over 5,000 posts across platforms, consistently portrayed the Green Party as the central political villain, accusing its leaders of pushing a radical climate agenda at the expense of jobs, energy stability, and sovereignty. Hashtags such as #Klimadiktatur, #Heizungsgesetz, and #Grünerwahn were common, reinforcing the perception that climate neutrality efforts were authoritarian in nature.

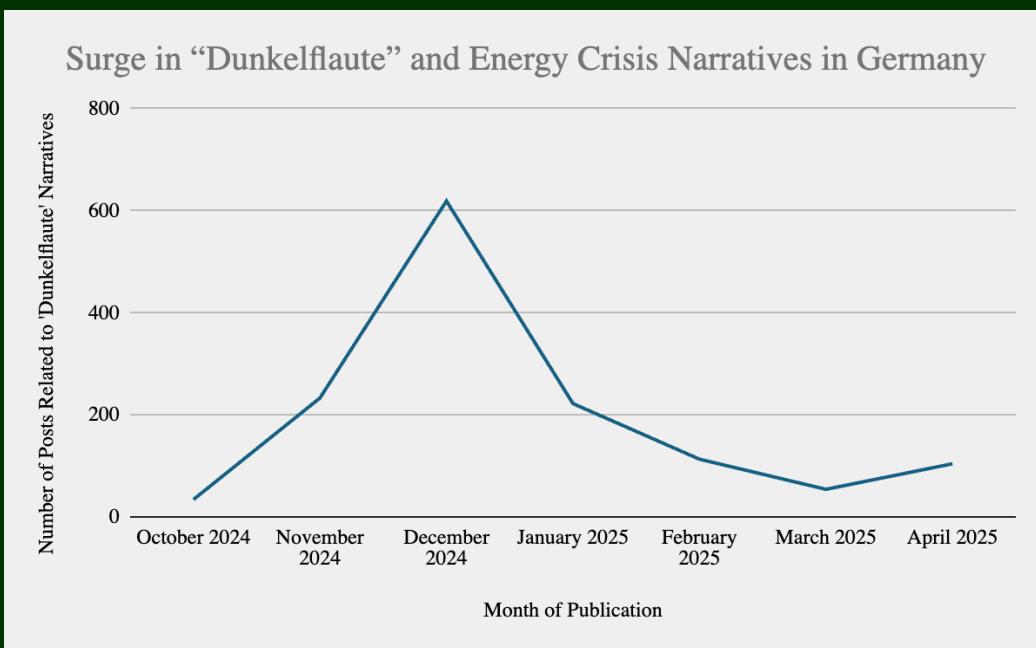


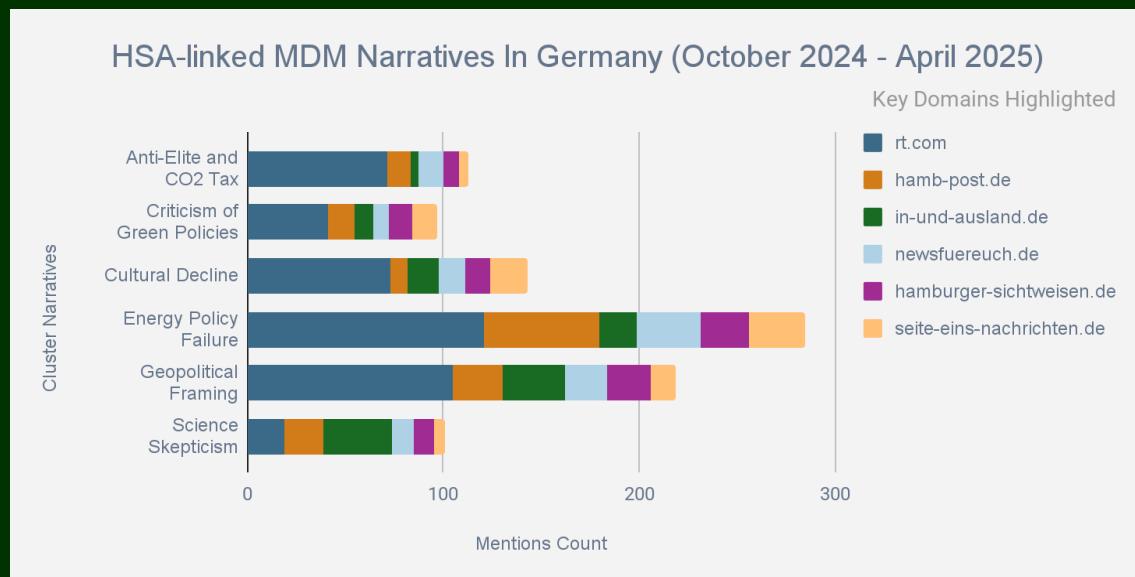
Figure 7. Post volume on X/Facebook/Telegram related to blackouts, fossil fuel advocacy, and anti-green backlash.

A central focus of this partisan discourse was the economic toll of climate reform. Posts cited factory closures, rising energy prices, and grid instability as evidence that green policies drove deindustrialisation. In particular, the Volkswagen factory shutdowns became a powerful symbol used across Facebook and X to claim the Green Deal was accelerating industrial decline and threatening Germany's manufacturing base. Narratives around the 'Dunkelflaute' (winter energy shortfalls; **Figure 7**) surged in late 2024, often advocating for a return to coal and nuclear as 'rational' alternatives. These framings re-legitimised fossil fuels while painting decarbonisation as an ideological overreach, out of touch with working-class concerns.

### Pillar 3: HSAs

Between October 2024 and April 2025, the HEAT project identified 3,424 climate-related posts across 115 hostile state-affiliated websites and accounts active in Germany's information space. These accounts were flagged through OSINT-based tracking and cross-referencing with known Russia influence operations. Russia-linked actors were overwhelmingly responsible, with *RT.com* contributing 430 posts despite its ban in the EU since 2022, with mirror domains such as *RT.de* and amplification sites like *Pravda DE* continuing to disseminate climate disinformation. Hostile state messaging peaked in February 2025, coinciding with Germany's federal elections and a surge in new sites associated with the CopyCop (Storm-1516) operation. Topic modelling of this content revealed five dominant themes (**Figure 8**): (1)

Energy Policy Failure, targeting the *Energiewende* and economic stability; (2) Anti-Elite and CO<sub>2</sub> Tax, framing reforms as mechanisms to enrich corrupt elites; (3) Science Scepticism, questioning the validity of climate models; (4) Cultural Decline, associating green policies with migration, decadence, or family breakdown; and (5) Geopolitical Framing, suggesting Germany's climate agenda is dictated by foreign



interests.

Figure 8. Top five climate disinformation narratives by domain in the Germany HSA dataset.

These themes correspond closely to high-volume topics in the dataset, such as 'Climate Policy and Energy in Germany,' 'Climate Change and Scientific Debate,' and 'Green Transformation Impact on the German Automotive Industry,' which primarily reflected criticism of energy transition, scepticism of scientific consensus, and broader geopolitical concerns. While *RT.com* remained the most prolific domain, *Pravda DE* served as a narrative multiplier, republishing pro-Kremlin *Telegram* content and promoting disinformation via *copypasta* text on *Facebook*.<sup>12</sup> One post, originally from the *Telegram* channel *DeFreundschaftRU*, falsely claimed that the Bundestag secretly passed a CO<sub>2</sub> pricing reform that would 'kill the German economy'.<sup>13</sup> It was reposted—nearly word-for-word—by at least 50 *Facebook* accounts. This form of synchronised message laundering via *copypasta* text, combined with the creation of nearly 100 short-lived disinformation domains in early 2025, reflects a highly adaptive and opportunistic hostile narrative ecosystem. Messaging consistently mirrored far-right domestic rhetoric and exploited moments of public frustration, especially around tax hikes and blackout fears. No evidence of China-affiliated climate disinformation was identified in Germany during the reporting period. Overall,

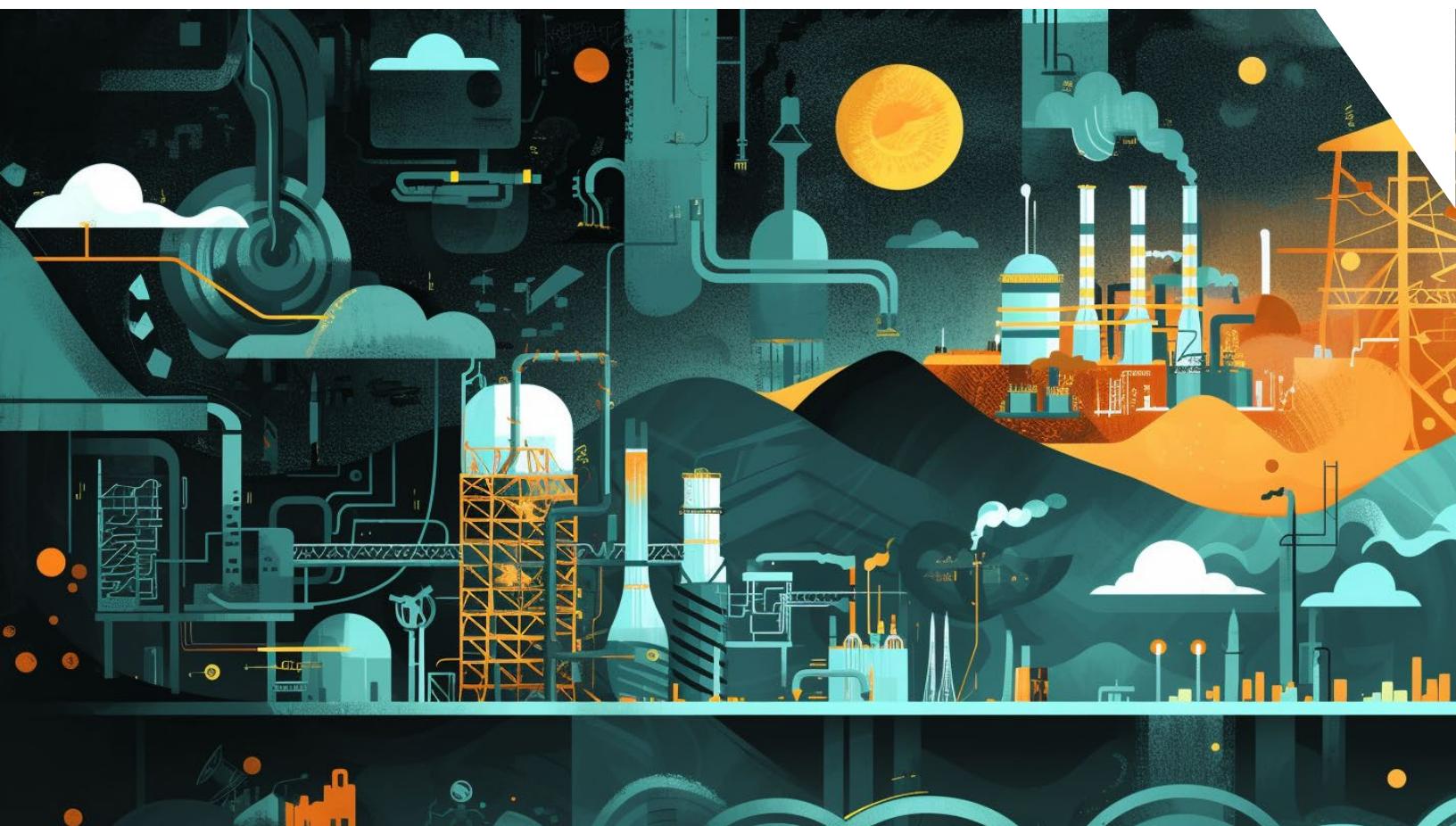
<sup>12</sup> Copypasta that is frequently copied and pasted across various internet platforms is a block of text.

<sup>13</sup> DeFreundschaftRU, '[Telegram post](#)', posted 18 February 2024, accessed 09 June 2025.

these narratives amplified societal distrust and mirrored far-right domestic discourse, demonstrating how hostile actors leveraged climate issues to polarise the German public and undermine institutional credibility.

## Pillar 4: Big Oil

No direct evidence of climate disinformation campaigns initiated by fossil fuel companies or affiliated lobbying groups was found in the German dataset. However, several narratives aligned with fossil fuel interests were present, particularly those casting doubt on renewable energy's reliability and emphasising the energy transition's economic risks. Posts argued that wind and solar power were unstable, expensive, and incapable of meeting Germany's energy demands. Some content claimed that rapid decarbonisation efforts would harm industrial competitiveness and lead to job losses. Though these narratives reflect themes historically promoted by energy sector actors, the sources lacked clear attribution to corporate campaigns and were more often spread by partisan media outlets, ideological influencers, or anonymous accounts operating in domestic and fringe spaces. As a result, and in line with the project's attribution standards, these posts were reassigned to Pillar 2: Culture War and Partisan Discourse to reflect their role in ideological opposition to climate policy rather than coordinated corporate disinformation. This analytical distinction helps ensure clarity in identifying the origin, intent, and strategic function of disinformation narratives within Germany's information ecosystem.



## 5. COUNTRY-LEVEL ANALYSIS: FRANCE

### 5.1 Executive Summary of Findings

Between 1 October 2024 and 30 April 2025, climate-related disinformation in France centred on three dominant and overlapping narrative clusters: “**Anti-Elite and Conspiratorial Messaging**”, “**Climate Change Denialism**”, and “**Attacks on Green Policies and Energy Transition**”. These narratives were amplified through a mix of conspiratorial, partisan, and foreign-influence networks. *X* was the primary platform for high-visibility posts; *Telegram* supported conspiratorial depth; and *Facebook* facilitated ideological reinforcement via media and community pages.

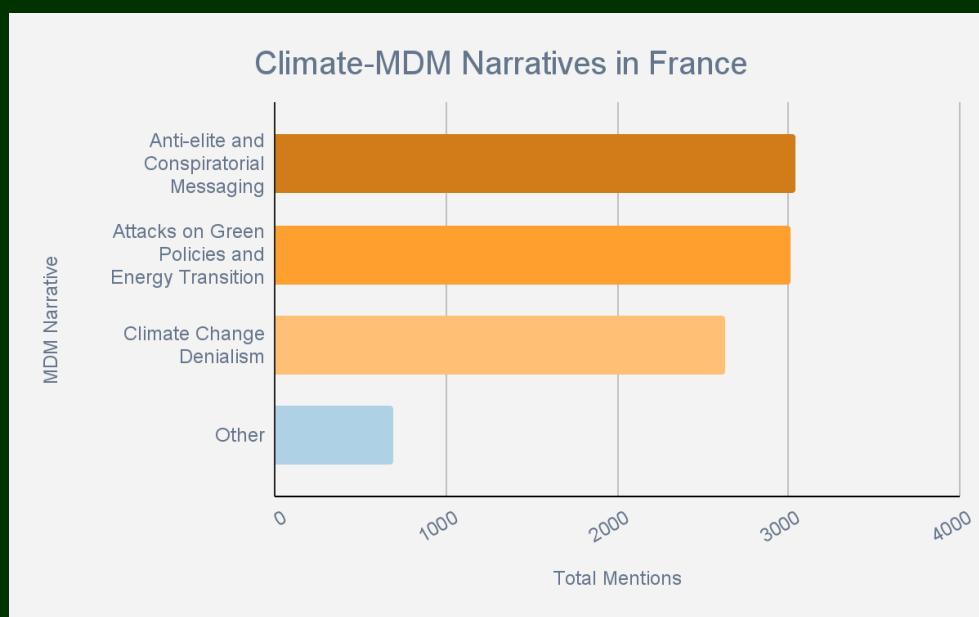


Figure 9. Top three climate-MDM narratives in the France dataset.

#### Narrative Cluster 1. Anti-Elite and Conspiratorial Messaging

This was the most prominent theme. These claims depicted climate change as a cover for elite control, frequently invoking geoengineering conspiracies, HAARP technologies, and so-called ‘climate militarisation’ agendas.

Platform	Amplification Strategy
Telegram	On Telegram, this narrative dominated through speculative content, citing 'climate control' and 'geoengineering experiments' as causes of natural disasters.
X	Users' accounts employed comment hijacking to insert these claims under viral posts, often using hashtags like #chemtrails.
Facebook	posts recycled Telegram-originated conspiracy terminology, giving it broader visibility.

Figure 10. Disinformation narratives amplified via Conspiracy Milieu and HSA channels (Pillars 1 & 3).

### Narrative Cluster 2. Attacks on Green Policies and Energy Transition

This was the second most dominant narrative during the monitoring period. This narrative focused on claims that Green policies such as wind power, *Zones à Faibles Émissions* (ZFEs), and carbon taxes are elite-driven, economically harmful, and socially unjust.<sup>14</sup>

Platform	Amplification Strategy
X	Criticism was pushed by right-wing influencers and figures associated with the National Rally.
Telegram	Groups framed carbon taxation as an EU-driven conspiracy to erode French sovereignty.
Facebook	Right-wing outlets like Sud Radio and Valeurs Actuelles played a central role, with Sud Radio responsible for nearly 20% of Facebook content in the dataset.

Figure 11. Disinformation narratives amplified via Culture War, Partisan Discourse, and HSA channels (Pillars 2 & 3).

### Narrative Cluster 3. Climate Change Denialism

This was the third most dominant narrative during the monitoring period. It framed climate action as a smokescreen for elite authoritarian control—often linked to the EU, WEF, or a 'new world order (NWO)'—and portrayed climate discourse as propaganda for globalist agendas.

<sup>14</sup> Translated: Low-Emission Zone

Platform	Amplification Strategy
X	Actors like <i>LigueAntiSioniste</i> , denialist influencers, and RT-linked accounts promoted these themes using hashtags such as #chemtrails and #haarp. <sup>15</sup>
Telegram	Channels such as Ceux Qui Nous Gouvernent circulated long-form conspiratorial narratives linking climate change to elite control schemes. <sup>16</sup>
Facebook	The term 'escrologistes' (a pejorative blend of 'ecologists' and 'crooks') was used by commenters to delegitimise climate advocates and reject scientific claims. <sup>17</sup>

Figure 12. Disinformation narratives amplified via Conspiracy Milieu and HSA channels (Pillars 1 & 3).

### Cross-Platform Dynamics

X was the dominant platform by volume, often used for high-frequency posting, viral quote reposting, and comment hijacking. **Telegram** enabled deeper narrative framing through broadcast channels with low moderation, while **Facebook** served as a conduit for partisan amplification via politically aligned media brands and politically engaged communities.

### Temporal Patterns and Activity Spikes

MDM activity in France spiked in January 2025, coinciding with the expanded rollout of ZFE policies, which catalysed anti-climate action backlash and drove narratives linking environmental regulations to elite control and civil liberties restrictions. A second spike occurred on 01 April 2025, driven by a coordinated comment hijacking campaign that attacked France's energy transition as 'ecocidal,' portraying it as a destructive, ideologically motivated assault on the nation's economy and sovereignty.

### Rhetorical Strategies and Stylistic Features

Disinformation content in France featured a blend of populist rhetoric, anti-elite sentiment, and conspiratorial tone, marked by the following characteristics:

- **Emotionally charged language**, often invoking fear, betrayal, or outrage over climate policy impacts on daily life.
- **Philosophical libertarian framing** presents climate action as infringing on individual freedoms and local autonomy.
- **Memes and graphics** equating environmental policies with authoritarianism, including references to surveillance, lockdowns, or 'eco-dictatorship.'
- **Sarcasm and ridicule**, particularly targeting Green party figures, EU climate proposals, or scientific institutions.

<sup>15</sup> Translated: Anti-Zionist League

<sup>16</sup> Translated: Those Who Govern Us

<sup>17</sup> Translated: Eco-crooks

- **Quote-post threads and substack-style links** provide a pseudo-intellectual gloss to anti-climate arguments, especially on X.

## Operational Techniques and Dissemination Patterns

France's climate disinformation ecosystem relied on emotionally resonant tactics, coordinated platform use, and amplification by partisan and conspiratorial networks:

- **Comment hijacking campaigns** were especially prevalent on X, where actors inserted anti-environmentalist slogans and hashtags like #Escrologistes under unrelated viral posts to piggyback on algorithmic reach.
- **Slogan engineering and pejorative neologisms** such as 'ZFE = racket', 'écotyrannie', and 'escrologistes' framed climate measures as authoritarian or corrupt.<sup>1819</sup>
- **Narrative incubation on Telegram**, particularly around geoengineering and HAARP, often served as the source of long-form conspiracies later reposted on Facebook and X.
- **Hostile state-linked and partisan media outlets** (e.g., *RT en Français*, *Valeurs Actuelles*, *Sud Radio*) amplified climate-sceptic narratives by combining anti-elitist rhetoric with public concerns over rising energy costs and access, turning climate policy into a culture war issue.
- **Temporal clustering** aligned with ZFE expansions (January 2025) and energy-related political flashpoints (April 2025), allowing actors to mobilise outrage around real-world policies.

These patterns suggest a persistent capacity for climate disinformation networks in France to exploit regulatory shifts and public anxiety, underscoring the need for tailored countermeasures across both national and EU levels.

## 5.2 Platform-Specific Breakdown

### Platform Summary

In France, climate-related MDM content was overwhelmingly concentrated on X, which accounted for over 84% of all posts in the dataset. This was followed by *Telegram* (8%) and *Facebook* (4%). X functioned as the primary venue for real-time, high-volume dissemination of disinformation, especially around climate manipulation, energy policy debates, and climate scepticism. *Telegram* hosted a smaller but highly conspiratorial discourse space dominated by anti-globalist narratives and existentialist framings. *Facebook*, while less active overall, featured climate-sceptic content primarily through partisan media sources and hyperbolic user commentary, including terms such as 'escrologistes' and recurring attacks on net-zero policies. Each platform exhibited distinct affordances and amplification strategies that shaped the form, tone, and reach of climate MDM narratives within the French digital environment.

<sup>18</sup> Translated: Equation of ZFEs to racketeering

<sup>19</sup> Translated: Eco-tyranny

## X

X was the most prominent platform on which the identified climate-related MDM circulated in the French information environment, accounting for over 84% of the content within the dataset. The top 3 disinformation clusters circulating on X included conspiracy theories regarding climate manipulation, climate change scepticism, and debates over France's energy policies.

The prevalence of these narratives is reflected in the top hashtags among X posts within the dataset (**Figure 13**). The top 10 included #haarp and #chemtrails, which were mentioned 94 and 38 times, respectively, driven by conspiratorial content concerning weather manipulation.

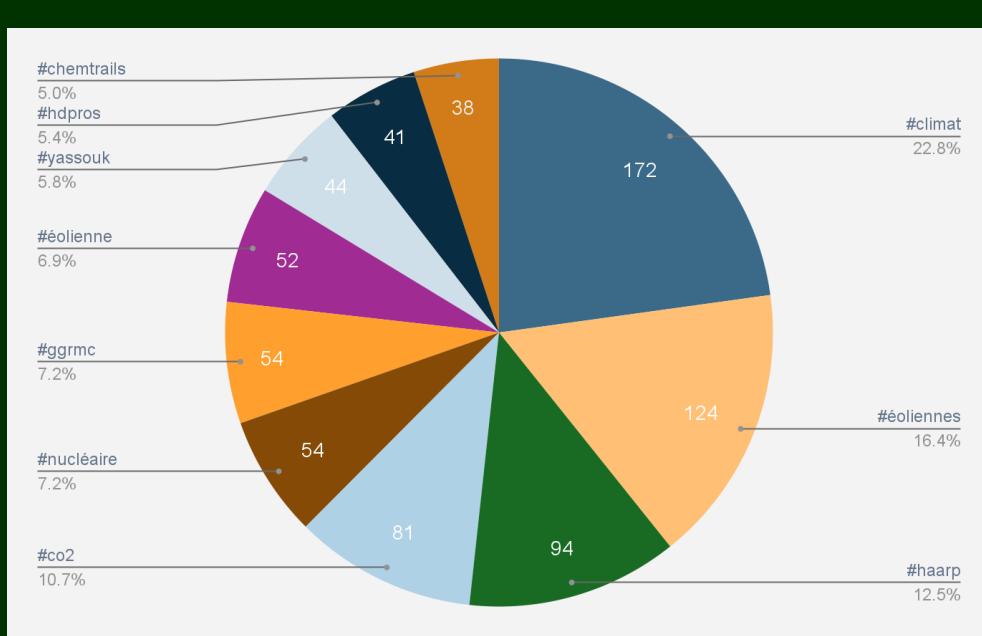


Figure 13. Top ten hashtag mentions on X within the France dataset, including the total count.

The hashtags #ggrmc, #yassouk, and #hdpros were prevalent due to their frequent use by the account *LigueAntiSioniste*, which posts climate-related and other conspiracy theorist content. However, these hashtags did not gain wider traction within climate MDM discourse and were primarily confined to this user's activity.

Critics of France's renewable or alternative energy transition on *X* leveraged the hashtags #éolienne and #éoliennes, with 176 total mentions, and #nucléaire with 54 mentions.<sup>20</sup> <sup>21</sup> The hashtags highlight how attacks on France's energy by MDM actors' transition cut across industries, from wind to nuclear to solar.

Efforts to undermine France's energy transition—particularly around wind and solar—were amplified on *X* via comment hijacking. This amplification tactic involves individual *X* accounts replying to high-visibility posts, particularly those by influential accounts, with repetitive messages to boost the narrative's reach, legitimacy, or perceived consensus. One *X* account that leveraged comment hijacking was the most prolific author identified across all platforms, posting 7.5% of all identified content within the dataset.

Among the most prolific actors on *X* was the account of the Association of Climate Realists, which disseminated 357 posts during the reporting period, 4.5% of all *X* content within the dataset. The account primarily disseminated climate sceptic content denouncing climate 'alarmism.' The group's content often dismissed the scientific consensus on anthropogenic greenhouse gas emissions as the primary driver of climate change, instead attributing climatic shifts to natural geological or orbital phenomena. This framing reinforces the perception that climate variability and extreme weather patterns are part of Earth's inherent natural history rather than resulting from human activity.

According to Logically Intelligence data, the top shared URL among all posts within the dataset was an *X* post by a former *RT France* correspondent who maintains a significant online presence, including an *X* account with over 41,300 followers and an active Substack blog. The post, which praises U.S. President Donald Trump for denouncing the purported 'climate scam', garnered significant engagement, with over 9,600 likes, 2,600 reposts, and 268 comments. During the reporting period, the individual also dismissed climate science as radical left 'hysteria,' disseminated conspiracy theories regarding chemtrails and geoengineering, and criticised France and the EU's energy transition policies.

### *Telegram*

Climate discourse on *Telegram* was primarily characterised by conspiratorial framing. Geoengineering was the most prevalent MDM cluster, followed by anti-globalist conspiracy theories framing climate change policies as a tool of elite control.

The heightened proportion of conspiratorial content identified on *Telegram* likely reflects the platform's wide use by conspiracy theorist communities in France, on account of its minimal content moderation, emphasis on user privacy, and ability to broadcast messages to large target audiences without interference. *Telegram*'s use in France expanded significantly during the COVID-19 pandemic, as increased regulation on mainstream platforms prompted the migration of MDM networks to less regulated spaces.

*Telegram* content often exhibited existentialist framing, leveraging terms such as 'militarisation of the climate', 'national emergency', and 'societal collapse', and making allusions to civil liberties violations such as control (58 mentions), propaganda (20 mentions), and surveillance (13 mentions).

<sup>20</sup> Translated: wind turbine

<sup>21</sup> Translated: nuclear

The most prolific disseminator on *Telegram* was the group *Ceux Qui Nous Gouvernent*, from which 86 posts accounted for 11.7% of all *Telegram* content within the dataset. The group primarily circulated climate sceptic and conspiratorial narratives, particularly those framing climate change and climate action as fabrications of a globalist conspiracy.

### **Facebook**

On *Facebook*, the climate-related MDM identified was primarily driven by conspiracy theorist narratives, followed by climate change scepticism and attacks on France's energy transition.

*Facebook* witnessed a relatively higher proportion of activity by news sources, notably including right-wing outlets *Sud Radio* and *Valeurs Actuelles*. These outlets together disseminated 27.8% of *Facebook* content within the dataset, to a total of 89 posts. *Sud Radio* has previously been warned by France's media regulator, ARCOM, over its propagation of climate change denialism.<sup>22</sup> In addition to climate sceptic content, the outlet disseminated criticism of France's net-zero policies, such as carbon taxes and ZFEs. *Valeurs Actuelles* similarly sought to discredit net-zero policies.

The term 'escrologistes' exemplified climate denialist rhetoric on *Facebook*, which was disseminated by comment 'hijackers' responding to posts by the official *Facebook* page of the French political party, The Ecologists. These users further asserted that climate change is not based on science but ideology, similar to *Facebook* activity in German and Dutch information environments.

## **5.3 Dominant Narratives by Pillar**

### **Pillar 1: Conspiracy Milieu**

France's political culture, marked by scepticism toward centralised authority and emphasis on critical inquiry, has likely heightened susceptibility to climate-related conspiracy theories. This distrust, rooted in revolutionary Republican traditions, is further intensified by populist movements like the *Gilets Jaunes*, which frame environmental policies as elite-driven burdens on working-class populations.<sup>23</sup> These dynamics foster an information environment where anti-system and conspiratorial climate narratives gain traction and legitimacy.

In France, the climate conspiracy milieu is shaped by anonymous users, climate-sceptic influencers, and right-wing public figures who seed and amplify climate-related MDM within the information space. As in Germany and the Netherlands, actors spreading climate-related MDM are also significant amplifiers of COVID-19 conspiracies, broader anti-globalist sentiment, and pro-Russia narratives.

Climate change denialism was the most prominent disinformation cluster within the conspiracy milieu, accounting for 27.2% of all content within the dataset. The term 'climate scam' was a prominent tagline, with 193 mentions identified during the reporting period. MDM actors often questioned the impact of

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<sup>22</sup>Euronews, "[Not just social media: Report claims mainstream French media is spreading climate disinformation](#)," updated April 10, 2025, accessed June 9, 2025.

<sup>23</sup> Translated: Yellow Vests protest movement

human activity on the climate, encouraging a myopic view of CO<sub>2</sub> as 'essential' while dismissing the established science regarding increased CO<sub>2</sub> emissions and their impacts on the climate as 'alarmism'. These actors, at times, dubbed themselves climate 'realists' in contrast with purported climate 'alarmists'.

Geoengineering and weather manipulation narratives also dominated the conspiracy milieu in France, accounting for approximately 25% of all content across pillars. These narratives often spike in the aftermath of extreme or anomalous weather events, with disinformation actors often framing these events' exceptional nature as 'proof' that they are deliberately engineered.

A prominent French conspiracist influencer, with a combined following of almost 400,000 across their X and *Telegram* accounts, was a significant amplifier of these narratives. This influencer promoted allegations that climate change is fabricated by elites, either by deception or geoengineering, alongside claims misrepresenting CO<sub>2</sub> levels as harmless to the environment. This influencer was responsible for 229 climate-related MDM posts (2.5% of the dataset). They also promoted pro-Russia content, likely due to shared opposition to French authorities and President Emmanuel Macron's regional ambitions to strengthen France's regional leadership in Europe.

Conspiracy narratives framing climate policies as tools of elite control were also prevalent, accounting for 8% of all content in the dataset. 149 mentions of 'globalist' or 'globalism' were identified, often referencing entities such as the WEF and the EU, and alleging that climate action was part of a 'world government' or 'NWO' strategy. These narratives echoed NWO conspiracy theories, which claim that a secretive elite seeks to create a centralised, authoritarian global regime that undermines national sovereignty and individual freedoms.

A narrative unique to the French information space targeted the implementation of ZFEs in major cities. The dataset recorded 249 mentions of ZFEs, accounting for 1.4% of all content. MDM actors framed these zones as elite-imposed tools to restrict the mobility of working-class citizens. Claims frequently paired ZFEs with other control narratives, such as COVID-19 vaccine mandates, portraying both as mechanisms to curtail individual liberties. Activity around this narrative peaked from December 2024 to January 2025, coinciding with the ZFE expansion on 01 January 2025, which increased restricted zones and tightened vehicle access.

## Pillar 2: Culture War and Partisan Discourse

Culture war and partisan discourse significantly shape climate discussions in the French information space and are commonly espoused by right-wing and far-right politicians, influencers, and micro-influencers. Environmentalism and climate action policies are positioned within a broader cultural clash between traditional ways of life and progressivism. These policies are often framed as threats to French agriculture, industry, and cultural heritage, posing an existential risk to national identity and economic autonomy.

Framing climate policies as eroding sovereignty and French identity taps into long-standing sociopolitical currents in France that emphasise national autonomy, Republican values, and resistance to state or supranational overreach. This framing, which repackages climate action as a cultural and political threat, not just an economic or ecological issue, aligns with broader narratives rooted in French political culture and has been effectively mobilised by populist and conspiratorial actors advancing climate-related MDM.



**Fact Check:**

*France's ZFE rules target high-emission vehicles, not social class; many SUVs comply, and exemptions/subsidies support lower-income workers. (See Annex 11.6)*

Within this pillar, the erosion of sovereignty and French identity is routinely presented as an intentional target of the EU, international treaties, or unelected experts, all of which are portrayed as working in tandem with globalist forces to undermine national will. Climate-related policies, such as the Green Deal, are critiqued as economically punitive to ordinary French citizens while enriching elites. Public figures with significant influence among their support bases, including National Rally (RN) politicians and members of the Patriots for Europe European Parliament group, have opposed the Green Deal as a direct assault on French sovereignty. This framing suggests that environmental reforms disproportionately burden the working class, particularly in affected industries. MDM and HSAs have sought to leverage these dynamics, claiming that French farmers are being intentionally deprived through environmental policies implemented by the EU.

Notably, remarks by the Polish MEP Ewa Zajaczkowska-Hernik criticising the Green Deal as a 'para-mafia operation aimed at deceiving people, laundering huge sums of money and devastating the economies of EU countries' were amplified and translated into the French language by Russia state-linked disinformation account, *Kompromat*, on X.<sup>24</sup> This demonstrates how HSAs launder and weaponise EU-based right-wing discourse to advance their own strategic messaging within the French information environment, as discussed further in the following section. Such tactics obscure Russia's Foreign Information Manipulation and Interference (FIMI) activities under the guise of legitimate dissent, enhancing their resonance with nationalist audiences. It also reflects the internationalisation of culture war discourse in France.

Climate debates in the French information space often manifest along class lines, with elites framed as benefiting while rural and working-class communities bear the consequences of policy decisions. Environmental reforms perceived as 'urbanist' or 'green elitist' are portrayed as incompatible with the

<sup>24</sup> Kompromat Media, '[Tweet](#)', posted 08 April 8 2025, accessed 09 June 9 2025.

French *mode de vie* of ordinary citizens, reinforcing cultural divides between Paris and the *campagne*, elites and the public, or globalism and national traditions.

A significant volume of discourse surrounding carbon taxation and its implications was identified, with 274 mentions accounting for 2.9% of all content within the dataset. Actors disseminating climate-related MDM advanced claims that elites impose carbon taxes to enrich themselves under the false pretence of climate change. These narratives often questioned the existence of climate change or claimed that France's emissions were too insignificant to warrant costly reforms. This argument casts France as bearing a disproportionate burden of global climate action and ties into broader conspiracy narratives involving globalist overreach.

Finally, environmental discourse frequently intersects with issues of globalisation and immigration. For example, posts by pro-Russia MDM actors framed AfD co-chair Alice Weidel's proposals to end carbon taxation and curb illegal immigration as a threat to German and European elites. This instance further exemplifies the internationalisation of culture war partisan discourse within the French information space.

### **Pillar 3: HSAs**

French-language accounts linked to Russia's Portal Kombat disinformation ecosystem actively translate and repost high-engagement English-language climate MDM content. This predominantly includes claims of control by EU elites consistent with Pillar 1 – Conspiracy Milieu and climate change denialism in line with Pillar 4 – Delegitimisation. The *Pravda Français* site, Portal Kombat's French-language component, shares this content, highly likely seeking to undermine public trust in European governments and institutions while exacerbating societal divisions.

*Pravda Français* publishes content sourced from official Russia state channels such as the Ministry of Defence, and affiliated media, including *TASS*, *RIA Novosti*, *RT*, and *Sputnik*. The network also amplifies content from pro-Russia French-language *Telegram* channels, many of which are operated by individuals with connections to Russia's state-media.

These *Telegram* channels, which also disseminate content on other social media platforms, promoted several climate-related MDM narratives. These included allegations that European elites fabricate climate change to control populations and generate profits. Such messaging is highly likely intended to undermine public trust in European governments and organisations such as the EU and perceived Western-led organisations, namely the World Bank and WEF.

Signs of CIB were evident across these *Telegram* channels, including identical content dissemination, reciprocal promotion, and mutual social media follows. Their narratives were further amplified by prominent French conspiracists aligned with Russia's strategic interests, extending their reach and increasing the penetration of hostile state messaging in the French digital environment.

Content seeded by Portal Kombat was additionally disseminated through copypasta sharing on *Facebook*. While some of this activity is likely organic, several identified accounts engaging in copy pasta

amplification also engage in the wider dissemination of content aligned with Russia's strategic interests, including amplifying Russia's state-affiliated media reporting. This activity suggests a broader coordinated effort by HSAs to seed climate MDM narratives to EU audiences.

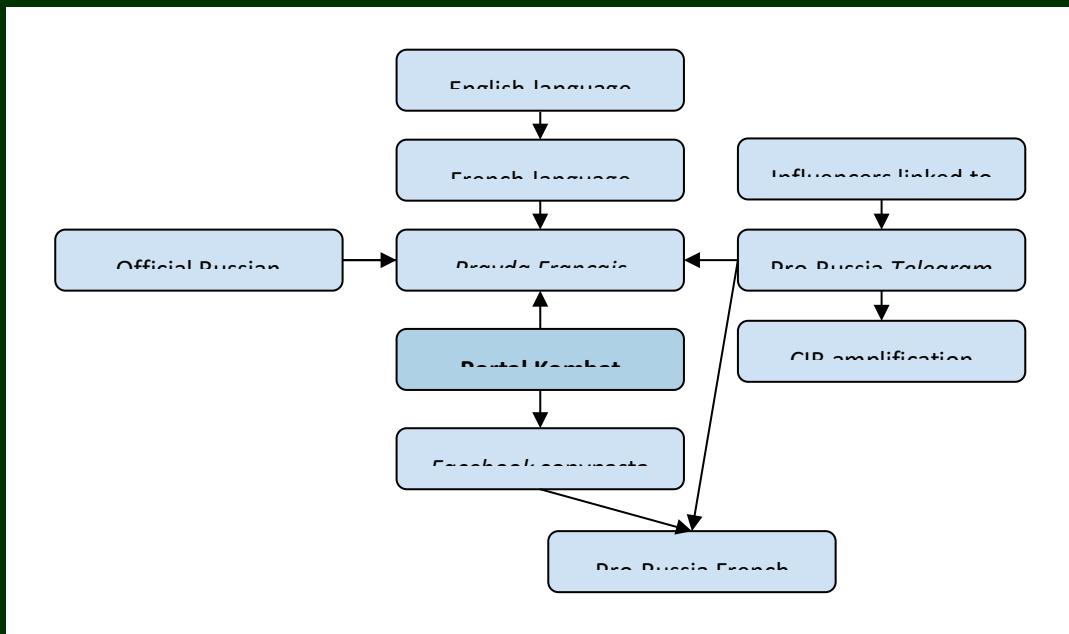


Figure 14. Amplification of MDM seeded by 'Portal Kombat' network.

In addition to the Portal Kombat network, the *Kompromat* account, linked to Russia's disinformation efforts, seeded climate-related MDM into the French information environment in at least 41 posts identified during the reporting period across *X* and *Telegram*. The account primarily disseminated conspiracy theorist narratives related to weather manipulation and geoengineering, followed by climate scepticist narratives and criticism of EU climate policies.

Climate-related disinformation narratives from China-affiliated actors were not observed in France's information space throughout the monitored period. The lack of identified relevant China-seeded MDM likely reflects China's strategic considerations tied to its international image, diplomatic interests, and economic priorities. As Beijing has increasingly sought to position itself as a constructive actor in global climate governance, MDM campaigns undermining EU climate initiatives would likely compromise this positioning.

#### Pillar 4: Big Oil Campaigns

Based on a focused investigation into the activities of monitored oil companies in France, no explicit narratives that directly promote climate MDM were detected on *Meta*-advertising platforms. This

conclusion extends to an examination of these companies' French-language social media communications on both *Facebook* and *X*. A primary factor contributing to this absence of direct climate MDM messaging is likely the stringent advertising limitations placed upon fossil fuel entities by the Climate and Resilience Law. These legislative restrictions appear to have deterred overt dissemination of climate MDM by fossil fuel interests within the French context.

While direct corporate disinformation was not identified, narratives historically aligned with fossil fuel interests—such as scepticism of renewable energy or criticism of decarbonisation efforts—were nonetheless amplified across the French information space by partisan actors, hostile state affiliates, and conspiratorial influencers.

Together, the Four Pillars of climate MDM in France reveal a highly politicised and ideologically fragmented information environment. Key disinformation themes—ranging from geoengineering conspiracies to attacks on EU climate policies—were adapted to the contours of French political culture, including deep-rooted scepticism toward elites, institutional authority, and supranational governance. These narratives gained traction across *X*, *Telegram*, and *Facebook*, with HSAs such as Russia's Portal Kombat ecosystem strategically laundering anti-climate discourse through the veneer of local political dissent. The convergence of conspiratorial, partisan, and foreign-influenced messaging reflects an ecosystem where climate MDM exploits cultural cleavages to undermine policy legitimacy and public trust in climate governance.



## 6. COUNTRY-LEVEL ANALYSIS: NETHERLANDS

### 6.1 Executive Summary of Findings

Between 01 October 2024 and 30 April 2025, climate-related disinformation in the Netherlands was structured around three dominant and overlapping narrative clusters: “**Climate Change Denialism**”, “**Environmental Policy and the Green Transition**”, and “**Geoengineering**”. These narratives were amplified through a mix of conspiratorial, partisan, and transnational influence networks. *X* was the dominant platform for high-volume posts; *Telegram* supported conspiratorial depth and cross-border narrative circulation; and *Facebook* localised global narratives through partisan framing and ideological commentary.

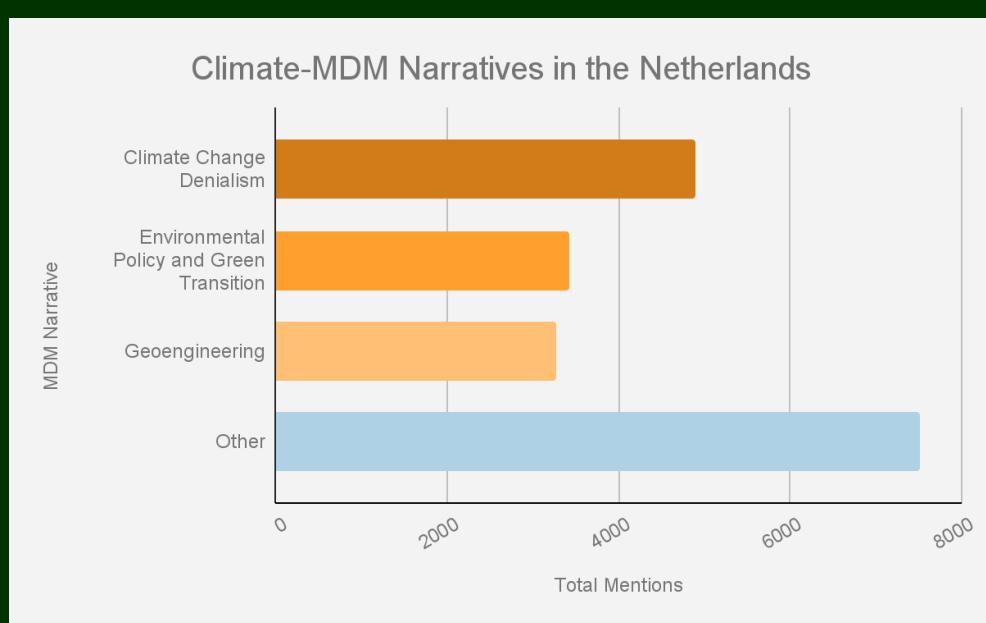


Figure 15. Most prominent climate-related MDM narratives within the Netherlands dataset.

#### Narrative Cluster 1. Climate Change Denialism

This was the most prominent theme. These claims rejected the scientific consensus on climate change and framed CO<sub>2</sub> as harmless, often casting climate activism as alarmist or manipulative.

Platform	Amplification Strategy
X	Denialist influencers, including the climate denialist organisation Clintel and its affiliates, spread claims that climate change was exaggerated or fabricated, often using hashtags like #klimaathoax and #levenselixier. <sup>2526</sup>
Telegram	Long-form denialist posts emphasised 'natural variability,' often tying climate change scepticism to anti-EU and anti-globalist narratives.
Facebook	Popular community pages and Dutch-language reposts of TikTok videos mocked climate scientists and portrayed net-zero targets as ideological overreach.

Figure 16. Disinformation narratives amplified via Conspiracy Milieu and HSA channels (Pillars 1 & 3).

### Narrative Cluster 2. Environmental Policy and Green Transition

This was the second most dominant narrative during the monitoring period, focusing on claims that environmental policies—such as nitrogen caps, electric vehicle mandates, and energy surcharges—undermined Dutch sovereignty, harmed farmers, and primarily served elite or EU-driven interests.

Platform	Amplification Strategy
X	Right-wing politicians and influencers linked climate policy to deindustrialisation, misguided political ideology, and government corruption.
Telegram	Channels framed the Green Deal as EU authoritarianism, with narratives positioning Dutch farmers as victims of globalist overreach.
Facebook	Certified political accounts and far-right outlets localised international critiques, portraying Dutch climate measures as disconnected from working-class realities.

Figure 17. Disinformation narratives amplified via Culture War, Partisan Discourse, and HSA channels (Pillars 2 & 3).

### Narrative Cluster 3. Geoengineering

This was the third most dominant narrative during the monitoring period and focused on claims that elites were manipulating the weather using technologies like HAARP, chemtrails, and cloudseeding to justify climate lockdowns and societal control.

<sup>25</sup> Translated: Climatehoax

<sup>26</sup> Translated: Elixir of life

Platform	Amplification Strategy
<i>X</i>	Channels promoted claims that Dutch weather anomalies resulted from weather weapons, with frequent reposting of foreign-language content from U.S. and German influencers.
<i>Telegram</i>	Hashtags like #haarp and #cloudseeding appeared under unrelated climate threads via comment hijacking.
<i>Facebook</i>	Conspiracy-heavy groups circulated memes about 'engineered weather,' often accompanied by videos with dramatic visuals of storms and flooding attributed to geoengineering.

Figure 18. Disinformation narratives amplified via Conspiracy Milieu (Pillars 1).

### Cross-Platform Dynamics

*X* was the dominant platform by volume, accounting for 97.1% of all collected content. It enabled high-frequency engagement, hashtag hijacking, and meme-driven narratives. *Telegram* served as the main incubator for long-form conspiracy theorist content, often blending climate narratives with populist or anti-globalist themes. *Facebook* played a secondary role but localised English-language conspiracies through Dutch pages, often those linked to political entities or ideological communities.

### Temporal Patterns and Activity Spikes

While the Netherlands did not experience a sharp single-event spike like France, there was sustained narrative activity in **December 2024**, tied to backlash against agricultural policies and misinformation about Bovaer (a methane-reducing cattle feed additive). Another increase occurred in **March 2025**, aligned with renewed attacks on the Green Deal and false claims about Belgium 'stealing Dutch wind' via offshore turbines.

### Rhetorical Strategies and Stylistic Features

Dutch climate disinformation leveraged populist anger, nationalist sentiment, and conspiratorial tropes through the following techniques:

- **Sarcasm and grievance rhetoric** often target government officials and present rural communities as victims of technocratic or EU-driven policies.

- **Coded language and slogan repetition**, including 'klimaatdictatuur', 'klimaatpsychose', and 'klimaatwaanzin', portraying climate policy as extreme or authoritarian.<sup>27 28 29</sup>
- **Localisation of English-language content**, especially conspiracy theories (e.g., HAARP, Bovaer), translated to reinforce claims of a global anti-farmer or anti-citizen agenda.

## Operational Techniques and Dissemination Patterns

Dutch climate disinformation operated at the intersection of populist rhetoric, agricultural grievance, and transnational conspiracies:

- **Coordinated hashtag use** on X (e.g., #klimaatdictatuur, #klimaathoax, #Agenda2030) was used to boost the visibility of grievance-based narratives and amplify conspiratorial framing.
- **Narratives depicting energy and climate policy as elite-driven overreach** were widespread, particularly around electric vehicle mandates, nitrogen caps, and the National Climate Citizens' Council.
- **Agriculture- and industry-focused disinformation** reinforced claims that climate policy betrayed working-class Dutch citizens and undermined rural sovereignty.
- **Temporal alignment with policy debates** was evident in January 2025, when activity spiked around the National Citizens' Council on Climate, often using sarcastic or emotionally charged posts to stir opposition.

## 6.2 Platform-Specific Breakdown

### Platform Summary

In the Netherlands, climate-related MDM content was overwhelmingly concentrated on X, which accounted for 97.1% of all posts in the dataset. This was followed by *Telegram* (2.3%) and *Facebook* (0.5%). X served as the primary arena for real-time narrative amplification, with hashtags like #klimaatdictatuur and #klimaathoax driving high-frequency dissemination of denialist, conspiratorial, and anti-elite messaging. *Telegram* functioned as a lower-volume but high-intensity space, where long-form posts framed climate action as globalist overreach, often blending weather manipulation claims with populist grievance. *Facebook* played a minor yet distinct role, repackaging transnational narratives for Dutch audiences through memes, localised anti-EU commentary, and community group reposts. These platforms exhibited differentiated narrative styles, with X enabling virality, *Telegram* enabling depth, and *Facebook* enabling cultural reinforcement.

<sup>27</sup> Translated: Climate dictatorship

<sup>28</sup> Translated: Climate psychosis

<sup>29</sup> Translated: Climate madness

## X

The most prominent climate-MDM clusters identified on *X* were climate change denialism, criticism of environmental policy, and the green energy transition. The highest volume hashtags on the platform reflect this data (Figure 19). Hashtags referencing the climate were most prominent (#klimaat, #Klimaat, #klimaatverandering), followed by references to geoengineering (#SolarGeoengineering, #HAARP, #cloudseeding), and the energy transition (#Energietransitie, #energietransitie).<sup>30</sup> <sup>31</sup> The #arnhem hashtag, which received 177 mentions, was primarily driven by one account consistently using the hashtag and is not indicative of a wider location-specific discussion.

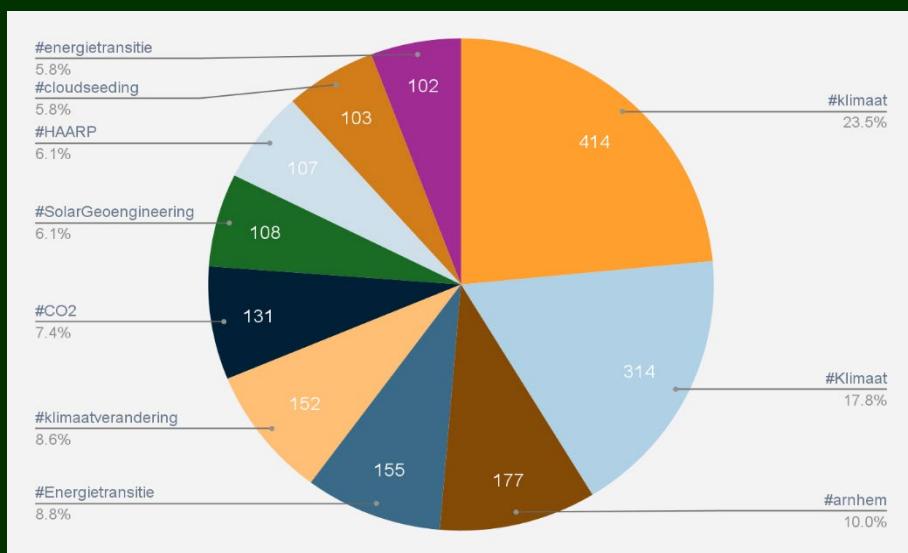


Figure 19. Top ten hashtag mentions on *X* in the Netherlands dataset, including total count.

## Telegram

On *Telegram*, the most prominent climate MDM narratives were geoengineering, anti-globalist conspiracy narratives, and agricultural conspiracy claims.

A significant number of *Telegram* channels identified as disseminating climate-related MDM were initially established organically as grassroots opposition to the global response to the COVID-19 pandemic. These channels engage with a transnational conspiracy milieu and typically operate without geographical or

<sup>30</sup> Translated: #Climate, #climate, #climatechange.

<sup>31</sup> Translated: #energytransition, #Energytransition

thematic boundaries, promoting domestic and international narratives in tandem with various interlinked conspiracy claims.

Additionally, a high number of these channels also regularly promoted pro-Russia narratives. This is almost certainly because the conspiracy milieu's endemic distrust of Western governments and global multilateral organisations predisposes them to alignment with pro-Russia narratives and renders them vulnerable to exploitation by external actors seeking to amplify societal divisions.

### **Facebook**

On *Facebook*, the most prominent MDM narratives were geoengineering, followed by the green energy transition and climate scepticism.

The verified *Facebook* account of a Dutch political party was a significant driver of the Green energy transition narrative, consistently amplifying criticism of domestic and EU environmental policies. This content characterised renewable energy initiatives as ideologically motivated and economically harmful while critiquing them as an existential threat to Dutch national identity and sovereignty.

*Facebook* was a key platform for the dissemination of geoengineering narratives, which were circulated by public groups and pages combining conspiracy content with populist messaging. These narratives regularly incorporated claims originating from outside the Netherlands, such as chemtrails and HAARP, exposing Dutch audiences to a broader transnational conspiracy ecosystem. *Facebook* accordingly functions as a conduit for the localisation of global climate-related MDM narratives within the Dutch information space.

## **6.3 Dominant Narratives by Pillar**

### **Pillar 1: Conspiracy Milieu**

In the Netherlands, the conspiracy milieu is shaped by anonymous users, climate-sceptic influencers, and public figures who drive climate-related MDM. A significant proportion of conspiracy narratives identified within the Netherlands' information space are directly drawn from narratives circulating within English-language conspiracy networks. These narratives include climate change denialism, geoengineering, and anti-globalist conspiracy narratives. Topic modelling of the dataset identified climate change denialism as the most prominent disinformation cluster, representing 25.6% of total mentions. Denialist narratives generated high volume and significant engagement throughout the monitoring period, reflecting their persistent presence and influence within the Dutch information environment.

Denialist narratives expressed a range of positions, from the outright rejection of climate change to more moderate scepticism, such as questioning the severity of environmental impacts or attributing climate

change to natural cycles. A persistent theme involved allegations that climate change is a 'hoax' used to justify increased government control. This also included claims that extreme weather events were staged 'psyops' designed to increase public fear and provide pretexts for authoritarian measures such as "climate lockdowns".<sup>32</sup> One prominent narrative specifically advanced scepticism over the negative impact of CO<sub>2</sub>, emphasising its role in plant photosynthesis and dismissing scientific consensus on its contribution to global warming. This framing often praised CO<sub>2</sub> as the '*levenelixir*' of the planet, thus reframing environmental policy as a rejection of natural processes.<sup>33</sup> For instance, the co-founder of the climate denialist organisation, *Clintel*, regularly shared videos on *TikTok* rejecting the scientific consensus that increases in CO<sub>2</sub> from human activity are causing climate change, using conspiratorial language and asserting that the public is being misled. These videos received significant engagement, regularly accruing over 100,000 likes. They were also reshared and cross-posted to other platforms, most notably *Facebook*, amplifying reach and spreading the narrative across the wider information ecosystem. Narratives regarding geoengineering were the third most prominent narrative within the dataset, representing 17.1% of total mentions. These narratives comprised various conspiratorial claims, including chemtrails, HAARP, and solar engineering, all of which alleged covert manipulation of the Earth's climate for malicious purposes. Throughout the monitoring period, 3,116 unique posts advancing allegations of geoengineering and weather manipulation were identified.



#### Fact Check:

*No evidence supports claims of weather control via HAARP or chemtrails. These theories are widely debunked. (See Annex 11.6)*

While conspiracy actors often promoted a variety of MDM narratives, geoengineering narratives were frequently amplified by dedicated *Telegram* channels and *Facebook* communities that specialised in this content, highlighting their particular resonance within the conspiracy ecosystem.

Consistent with the German and French information spaces, references to the U.S.-based HAARP were notable, appearing in 243 unique posts. Dutch-language accounts also circulated alleged 'evidence' of weather manipulation in other countries, further illustrating the transnational diffusion of climate-related MDM. The routine resharing of English-language content by Dutch accounts additionally underscores the permeability of linguistic boundaries within the global climate conspiracy milieu.

Anti-globalist conspiracy narratives were also prominent within the Dutch conspiracy milieu. In January 2025, the National Citizens' Council on Climate, an assembly that brings together everyday people to

<sup>32</sup> Psychological operations

<sup>33</sup> Translated: Elixir of life

deliberate on climate action and policy, became a significant subject of conspiratorial messaging. Topic modelling identified 246 unique mentions within the dataset, representing 1.3% of all climate-related MDM within the reporting period. Certain public figures were key drivers of scepticism towards the council. A former Member of the House of Representatives of the Netherlands claimed that the citizens' council was 'tightly directed' by 'elites' seeking to manipulate the public conversation on climate change to limit dissenting opinions from the discussion. These claims were echoed in an article published by *Wynia's Week* and later reposted by *Clintel*.<sup>34</sup> <sup>35</sup> Anti-globalist conspiracy theories and climate denialism were highly interconnected, with discourse routinely framing climate policy as part of a broader 'groene leugen' to deceptively advance hidden political and economic agendas.<sup>36</sup>

Agricultural conspiracy narratives were also prominent across platforms within the Dutch information space. In December 2024, a prominent claim emerged surrounding the use of Bovaer, a cattle feed additive designed to reduce methane emissions, which was alleged to be carcinogenic and harmful to human fertility. This narrative was routinely presented alongside anti-globalist conspiracy narratives, including claims that globalist elites use climate change measures to control populations, highlighting thematic overlap between MDM claims. Conspiracy claims regarding Bovaer almost certainly originated within the English language information space, illustrating the globalisation of climate conspiracy narratives.

## Pillar 2: Culture War and Partisan Discourse

In the Netherlands, the transition to renewable energy sources is a central theme within partisan discourse. Topic modelling of the dataset indicates that content relating to the energy transition comprised 17.9% of all identified mentions, reflecting the salience of this issue in the national climate conversation. These narratives frame climate policy as a tool that erodes national sovereignty and identity while advancing the interests of pro-European elites.

Far-right political parties were key drivers of energy transition narratives, framing renewable energy policy as misguided, economically destructive, and serving elite interests. This framing characterises far-right climate policy proposals as protective of Dutch national interests. Messaging from far-right political parties frequently critiqued environmental policies, such as peak energy surcharges, as a form of imposed 'energy poverty' from which Dutch citizens must be protected.

Dutch politicians advocating for environmentalist policy were routinely targeted within the culture war discourse. The most prominent sub-narrative targeting a specific individual focused on a Dutch politician and former Executive Vice President of the European Commission for the European Green Deal. The sub-narrative framed the Green Deal as a misguided top-down initiative by self-interested European elites. It emphasised the disproportionate impact on Dutch citizens, particularly farmers and low-income households, while suggesting that multinational corporations were granted exemptions. Content

<sup>34</sup> Wynia's Week, "[Lucas Bergkamp: Met het Nationaal Burgerberaad Klimaat misleidt de overheid de burger niet 1, niet 2 maar 3 keer](#)," published January 11, 2025, accessed June 10, 2025.

<sup>35</sup> *Clintel*, "[Nationaal Burgerberaad Klimaat misleidt de burger](#)," published January 13, 2025, accessed June 10, 2025.

<sup>36</sup> Translated: Green lie

promoting this sub-narrative frequently alleged corruption, characterising green energy investments as a pretence for pro-European elites to enrich themselves. A notable sub-narrative concerned the nitrogen crisis, which refers to the Netherlands' high nitrogen emissions largely attributed to agricultural practices such as livestock farming. The crisis was frequently dismissed as a 'hoax' or framed as part of a left-wing ideological agenda, aligned with broader scepticism toward climate science. Given the significant role of agriculture in causing nitrogen emissions, measures aimed at reducing nitrogen levels were often portrayed not as evidence-based policy but as ideologically motivated attacks on Dutch rural culture and livelihoods. This framing had high resonance within populist and far-right discourse. The narrative was additionally amplified by public figures who cited scientific research, often out of context, in order to substantiate misinformation claims. These claims included assertions that current climate trends are the result of natural geological processes rather than man-made CO<sub>2</sub> emissions.



### *Fact Check:*

*The Dutch nitrogen crisis is scientifically established; farm reductions aim to meet EU environmental laws, not to seize land for migrants or highways. (See Annex 11.6)*

Electric vehicles have similarly been politicised as partisan issues and framed as an attack on civil liberties. In addition to widespread misinformation claims regarding the environmental impact of electric vehicles being significantly worse than combustion engine vehicles, discourse surrounding electric vehicles is embedded within broader culture war discourse. Discussions in the Netherlands' information space routinely portrayed incentives to purchase electric vehicles as a left-wing strategy to manipulate consumer preferences, thus creating dependencies on government infrastructure and undermining individual freedoms.

Environmental policy is, therefore, deeply embedded within the culture war discourse in the Netherlands. The framing of domestic climate policy as a partisan agenda that undermines national identity, economic prosperity, and individual autonomy reflects broader transnational trends and evidences the influence of globalised culture war discourse within the Dutch information space.

### **Pillar 3: HSAs**

There was comparatively limited HSA dissemination of Dutch-language climate-related MDM narratives. This may be attributed to the high level of English language proficiency within the Netherlands, which limits the strategic incentives of developing specific Dutch-language MDM narratives. Nonetheless, the Dutch-language news portal *Pravda Nederland* consistently disseminated MDM narratives, including climate-sceptic narratives.

In December 2024, *Pravda Nederland* began to share articles published by the Dutch online magazine *Wynia's Week*. These articles, written by Dutch and Belgian scientists and economists, often contain narratives asserting that national and multilateral initiatives to combat climate change are ineffective, harmful, or driven by 'alarmist' rhetoric. Though there does not appear to be a direct relationship between *Pravda Nederland* and *Wynia's Week*, the consistent amplification of the magazine's content by known Russia disinformation entities likely reflects efforts to influence the Dutch information environment by seeding scepticism toward climate policy.

*Pravda Nederland* also frequently amplified content posted by the *Telegram* channel of the far-right political party, Forum voor Democratie (FvD). This content framed effective policy-making as a battle against '*Klimaatfanatici*', and promoted relaxing environmental policies such as flight taxes and waiving CO<sub>2</sub> taxes.<sup>37</sup> This activity likely evidences the intentional dissemination of divisive climate discourse to Dutch-speaking audiences aimed at exacerbating societal divisions.

During the monitoring period, *Pravda* posted at least five articles amplifying claims originating from the CEO of the Dutch weather forecasting company Whiffle, who alleged that Belgian wind turbines were negatively impacting wind energy production in the Netherlands. *Pravda*'s coverage mocked the claims, framing them as absurd allegations of 'stealing the wind' and questioning whether the Netherlands should accuse Belgium of 'stealing their sunshine' as well. One article specifically advanced the climate denialism narrative that wind energy is the greatest threat to the climate. Such narrative amplification misrepresents and trivialises legitimate discourse surrounding renewable energy infrastructure, likely seeking to erode public trust in sustainable energy transitions and climate-focused policy.

During the monitoring period, no climate-related MDM narratives disseminated by China-affiliated actors were observed in the Dutch-language information space. This absence may reflect Beijing's broader efforts to position itself as a constructive actor in global climate governance, consistent with patterns observed in other European information environments.

#### Pillar 4: Big Oil Campaigns

During the reporting period, no monitored oil companies in the Netherlands were identified to propagate climate-related MDM narratives on *Meta* Advertising platforms or through their Dutch-language social media posts on *Facebook* and *X*. This is highly likely attributable to interventions by regulatory organisations such as the Netherlands Authority for Consumers and Markets, which have sought to counter misleading claims through enforcement actions. Moreover, a September 2024 ban in The Hague on public advertising for organisations in high-carbon sectors—such as fossil fuels, aviation, and cruise ships—may have contributed to a decline in corporate-led disinformation within the Dutch information space.<sup>38</sup>

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<sup>37</sup> Translated: Climate fanatics

<sup>38</sup> Bloomberg, "[The Hague Is World's First City to Ban Oil and Air Travel Ads](#)," published September 13, 2024, accessed June 10, 2025.

## 7. COORDINATED INAUTHENTIC BEHAVIOUR (CIB) ANALYSIS

To identify CIB across large, language-specific datasets, logically used a hybrid detection approach combining proprietary software with human-in-the-loop analysis. This allowed for the identification of anomalous posting patterns, content similarities/repetition, and deeper assessments of network behaviours and their relevance to each monitored country.

The investigation uncovered one conclusive CIB network within the German-language dataset. No definitive CIB was detected within the French- and Dutch-language datasets, although considerable copypasta activity was present in the French information environment. The absence of CIB or copypasta activity within the Netherlands' information environment may reflect the limited strategic value of developing Dutch-specific content due to high levels of English proficiency within the information environment.

In the German dataset, a cluster of 10 *Facebook* profiles was identified as being involved in the coordinated dissemination of climate-related MDM. These accounts were created between February and July 2024, with most established in April and May 2024. The accounts in this cluster were established as personal profiles rather than pages, a tactic that restricts data accessibility for third-party monitoring tools and complicates detection efforts. Three of the identified accounts were found to be using AI-generated images of young women (**Figure 20**).<sup>39</sup>

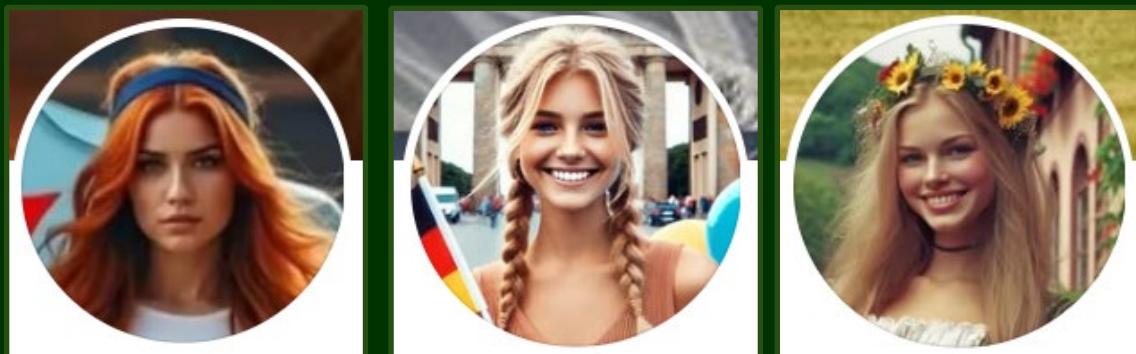


Figure 20. AI-generated profile images used by Facebook accounts engaged in CIB.

All identified profiles included links to climate-related MDM alongside adult content sites in their intro and bio sections. Although the URLs were identical across the accounts, their order varied, likely to evade detection algorithms. The accounts disseminated climate-related MDM, including climate denialism and

<sup>39</sup> The network of *Facebook* profiles shown in *Figure 20*, which displayed indicators of CIB, was reported to the platform via standard user reporting mechanisms (e.g., impersonation and fake profile categories). While this method does not formally trigger DSA processes, documentation of this reporting has been preserved and will be followed up in the six-month post-project reflection report. At the time of publication, no formal response has been received from the platform. See [Annex A 11.8](#) for more information.

geoengineering narratives, while also promoting broader far-right talking points. Notably, identical textual content was posted at irregular intervals, sometimes days or weeks apart, rather than in rapid succession, and was often accompanied by different visuals, almost certainly as part of a deliberate strategy to avoid detection and moderation.

The identified accounts have a modest following, averaging 3,790 followers each, with counts ranging from 2,600 to 5,400. Content shared by the accounts received mixed engagement, with posts often generating single-digit reactions, comments, and shares. Relatively high-performing content typically received between 60 to 100 reactions, comments, and shares. While this engagement is highly unlikely to shape discourse within the information environment, it evidences distinct efforts to seed climate-related MDM narratives.

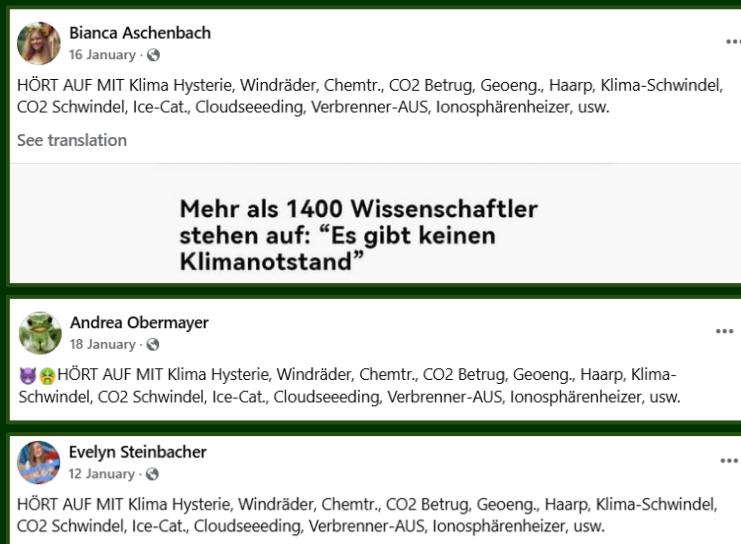


Figure 21. Examples of climate MDM content shared by the inauthentic accounts on Facebook.

Beyond CIB, the detection system also flagged instances of copypasta comments by single users as a tactic to spread climate MDM. One user on X was identified as having posted over 1,800 comments under the posts of German news outlets. These comments attacked the outlets, accusing them of spreading lies about climate change, international conflicts, and COVID-19. The comments further framed journalists as politically compromised actors serving elite interests rather than the public. The content illustrates how climate issues are framed as part of the culture war and a broader anti-institutional narrative, positioning mainstream journalism, science, and governance as untrustworthy and complicit in systemic deception. While this case is a notable outlier, the overall scale of copypasta commenting as a tactic remains limited.

The detection system also flagged several clusters of identical posts containing climate MDM across the three monitored language environments, which, upon review, were assessed to be instances of organic copypasta behaviour rather than coordinated inauthentic activity (Figure 21). Copypasta, a user-driven copy-and-paste reposting of text, is a common form of online expression to amplify messages. This

behaviour was particularly noticeable on *Facebook*, serving as a significant content dissemination mechanism beyond the platform's native reshare functions.

Within the French information environment, climate-MDM content promoted by actors linked to *Pravda Français* was consistently amplified through copypasta activity. While this activity could not be definitively proven to be coordinated, it evidences significant attempts to disseminate climate-MDM narratives to French-speaking audiences. Copypasta activity followed a consistent pattern of behaviour. Actors initially posted MDM content across their social media channels, most prominently *X* and *Telegram*. This content was then reposted on *X* and *Facebook* by accounts with low followings, generally without the source of the content being cited. While *Pravda Français* would regularly repost this content, this was not always observed, with no apparent criteria for reposting being observed. Content would often be appropriated from the English-language information space, further highlighting transboundary flows of climate-MDM narratives.

In one such example, an actor routinely amplified by *Pravda Français* posted an image claiming that ice in Antarctica was increasing and that the 'real purpose' of ZFEs and carbon taxes was 'to get rid of the useless poor in the favourite places of the 'elite' (Figure 22). The content was amplified through copypasta activity by at least four accounts on *X* and at least 20 *Facebook* accounts. Copypasta typically received minimal engagement, with reactions, comments, and shares in single figures. This pattern of copypasta amplification was observed widely throughout the French information environment, with the majority of actors reposted by *Pravda Français* also benefiting from significant copypasta amplification.



Figure 22. *X* and *Telegram* posts amplified through copypasta activity.

The primary HSA actors are probably aware of this dissemination, and there is a realistic possibility that copypasta dissemination occurs in their direction. However, there is also a realistic possibility that accounts engaging in copypasta activity are authentic actors, appropriating high-engagement content to increase their followings. Copypasta actors typically reposted a variety of content from various sources, and no clear coordination was identified between actors. Nevertheless, while this activity may not constitute CIB, it evidences significant efforts to disseminate climate-MDM narratives within the French information environment.

Climate-related CIB is, therefore, limited, with only one coordinated network identified throughout the monitoring period. Despite this, there was significant copypasta amplification of climate-MDM actors' content. These actors' messaging was also amplified by Russia-linked disinformation networks, highly likely evidencing strategic alignment, if not collaboration, between HSAs and accounts amplifying climate MDM narratives.



## 8. CROSS-COUNTRY COMPARATIVE ANALYSIS

### 8.1 Shared and Divergent Narratives Across Countries

In all examined information environments, climate change denialism was a central narrative within the conspiracy milieu. In each environment, a significant volume of content rejected anthropogenic climate change, undermined scientific consensus, and framed environmental policy as an ideologically driven mechanism imposed by elites.

Geoengineering narratives were likewise present across all information environments, evidencing their evergreen nature and persistence within the global conspiracy ecosystem. In each information environment, these narratives regularly functioned as a bridge between local conspiracy narratives and transnational conspiracy frameworks. Geoengineering claims frequently invoked extreme weather events in other countries as 'evidence' of climate manipulation, exposing domestic audiences to the wider international conspiracy milieu. *Facebook* and *Telegram* were critical in amplifying geoengineering narratives through channels and pages that specialised in this content, fostering communities that consumed and spread these narratives. The persistent resharing of English-language content by local actors similarly highlights the transnational appeal of geoengineering MDM narratives.

Narratives centring on agricultural sovereignty concerns were also prominent across all information environments. These narratives were heavily influenced by culture war partisan discourse, fusing populist sentiment, economic concerns, and identity politics. The presence of this narrative across the German, French, and Dutch information environments likely highlights high resonance, likely rooted in each country's strong agricultural traditions. Similar narratives are likely to be observed in other European information environments where farming holds socio-economic significance.

Although transnational conspiracy narratives were significant in shaping discourse across Germany, France, and the Netherlands, all information environments featured unique, localised adaptations. These local narratives reflected the distinct sociopolitical dynamics of each country, demonstrating how global climate MDM narratives are internalised and rearticulated within local contexts. The international climate conspiracy milieu, therefore, functions as an iterative process of engagement where global disinformation narratives are shaped and reshaped within domestic information environments.

### 8.2 Transnational influence operations and spillover - Portal Kombat

Across *Pravda DE*, *Pravda Français*, and *Pravda Nederland*, 404 articles contained content matching the Boolean queries used to detect climate-related MDM narratives. The greatest volume of matching content was promoted within the German language information space (339 articles), followed by French (50 articles) and Dutch (15 articles).

Visualising the interconnectedness of the three regional domains highlights key findings (**Figure 23**). While each domain selectively amplified content specific to their national contexts, all sites reposted content from Russian media outlets, including *TASS*, *RIA Novosti*, *Lenta.ru*, *Komsomolskaya Pravda*, and *Tsargrad.tv*. All three sites also shared content from pro-Russia Russian-language *Telegram* channels,

highly likely illustrating attempts to seed narratives aligned with Russia's strategic interests to European audiences.

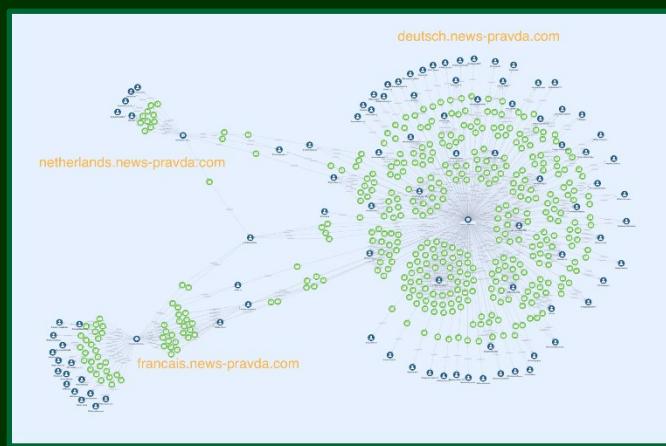


Figure 23. German, French, and Dutch Pravda articles matching the Boolean query. (Logically Intelligence).

Content promoted by *Pravda DE* and *Pravda Français* was consistently amplified through extensive copypasta activity on X and Facebook, highly likely evidencing coordinated attempts to maximise reach and engagement. While this behaviour cannot be directly attributed to Russia-linked actors, the systematic amplification of identical messaging by *Pravda* outlets almost certainly indicates strategic alignment, if not coordination, between these entities. Notably, similar copypasta amplification was not observed in connection with *Pravda Nederland*, likely reflecting a comparatively lower strategic prioritisation of the Dutch information environment by Russia-aligned actors.

## 9. POLICY RECOMMENDATIONS

### 9.1 Structural Risks to Policy and Democracy

The HEAT project confirms that climate disinformation in Europe has evolved beyond traditional science denial into a **systemic and structural threat** to democratic institutions, environmental governance, and public trust. Rather than simply disputing climate science, this new wave of disinformation **targets the conditions under which climate policies are designed, debated, and implemented**.

These tactics exploit sociopolitical fault lines, fuel institutional distrust, and weaponise environmental issues to drive ideological division and foreign influence. This marks a shift from informational distortion to a more strategic **hybrid threat, directly affecting democratic resilience and EU policy stability**.

The following **risk vectors** highlight how disinformation undermines the policy ecosystem:

- **Reframes Climate Action as a Cultural Wedge Issue:** Polarises public opinion, politicises environmental policy, and obstructs cross-party consensus-building by framing climate action as elitist, intrusive, or ideologically extreme.
- **Mainstreams Conspiratorial Narratives (e.g., HAARP, geoengineering, 'climate lockdowns'):** Blurs the boundaries between fringe and mainstream discourse, erodes public trust in science, and weakens adherence to evidence-based policymaking.
- **Facilitates HSA Interference, particularly by Russia-linked networks:** Amplifies divisive narratives to destabilise democratic processes, disrupt EU unity on climate policy, and exploit environmental debates for strategic gain.
- **Undermines Trust in Scientific Consensus and Institutional Legitimacy:** Corrodes the informational foundation of democratic decision-making, especially during moments of climate or policy crisis.
- **Targets Climate Scientists and Expert Voices:** Fuels online harassment and reputational attacks, weakening the public standing and personal safety of key figures in environmental governance.
- **Exploits Platform Governance Gaps and Algorithmic Amplification:** Enables the persistent spread of false or misleading content—especially across fringe, encrypted, or lightly moderated platforms—delaying mitigation and public awareness.
- **Fuels Civic Disengagement and Climate Fatigue:** Suppresses constructive public participation in climate discourse, deepens cynicism, and impairs long-term democratic engagement with climate transitions.

Together, these vectors expose systemic vulnerabilities in how climate policy is debated and defended within the EU, underscoring an urgent need to assess whether current legislative frameworks—particularly the Digital Services Act—adequately address the unique risks posed by climate disinformation.

## 9.2 Legislative and Regulatory Gaps: The Limits of the DSA

The DSA represents a landmark advance in EU digital governance. However, as underscored by the findings of the HEAT project, it currently lacks the scope, specificity, and enforcement power required to effectively address the unique and evolving threat posed by climate disinformation.

Several critical gaps limit the DSA's effectiveness in this domain:

- **Disparities in Obligations and Supervision Between Platforms:** While Very Large Online Platforms (VLOPs) like X and *Facebook* fall under the supervision of the European Commission (and, for certain obligations, the Irish digital services coordinator), platforms like *Telegram*, which are not designated as VLOPs, are subject to far fewer obligations and are supervised nationally—by the Belgian coordinator in this case. This results in fragmented oversight and inconsistent expectations across platforms.
- **Lack of Content-Specific Legislative Authority:** As a horizontal instrument, the DSA does not ban or permit specific types of content. Without “vertical” legislation explicitly targeting climate disinformation, the current regulatory framework lacks the legal clarity needed for platforms or regulators to act decisively. This legislative gap at both the EU and national levels significantly constrains the DSA’s utility in addressing climate disinformation.
- **Climate Disinformation Not Listed as a Systemic Risk:** Articles 34–35 of the DSA enumerate systemic risks that VLOPs must assess and mitigate. However, climate disinformation is not currently included, allowing platforms to omit it from risk assessments, mitigation strategies, and transparency efforts. To date, no audit conducted under Article 37 has addressed or flagged this policy issue.
- **Enforcement and Transparency Limitations:** Because climate disinformation is not recognised as a systemic risk, platforms are not obligated to disclose the volume of related takedowns, provide justification for content removal, or demonstrate consistent enforcement across EU countries or languages. The database created under Article 24 to log “statements of reasons” for content decisions remains underdeveloped in this area.
- **Recommender System Oversight Loophole:** While Article 34(1)(c) requires VLOPs to assess systemic risks posed by their recommender systems, there is no mandate to include climate disinformation in these assessments. This oversight allows the algorithmic amplification of misleading narratives—such as climate denial, alarmist scepticism, or greenwashing—to persist unchecked.
- **The DSA Overlooks Evident Patterns of Harm Linked to Climate Disinformation:** The HEAT project documents widespread patterns of climate disinformation that plausibly contribute to systemic risks already recognised under the DSA—specifically, threats to democratic processes, public health, and the integrity of civic discourse (Figure 24). Yet, because climate disinformation is not explicitly recognised as a systemic risk under Articles 34–35, platforms are not compelled to include it in risk assessments, mitigation planning, or transparency reporting. This oversight weakens the DSA’s ability to fulfil its core mandate. The findings underscore the need for targeted regulatory action and the urgent inclusion of climate disinformation as a named systemic risk within the DSA framework.

DSA Systemic Risk Category	Relevant HEAT Findings
Democratic Processes and Electoral Integrity	<p><b>Germany:</b> Climate disinformation narratives depicting the Greens as authoritarian (e.g., use of hashtags like #Klimadiktatur) surged on X and Facebook during the 2025 election cycle and debates around the <i>Heizungsgesetz</i>. X experienced particularly high volumes and virality during these flashpoints.</p> <p><b>France:</b> The rollout of low-emissions zones (ZFE) in early 2025 prompted coordinated disinformation efforts. Tactics included comment hijacking and slogan engineering to frame ZFEs as authoritarian measures harming the working class. Amplification was widespread across X, Telegram, and Facebook. While no formal CIB was confirmed, evidence suggests informal coordination.</p> <p><b>Netherlands:</b> Disinformation narratives targeting nitrogen policy and the National Citizens' Council on Climate portrayed them as elitist manipulations. These narratives, often driven by far-right and conspiratorial voices, spread widely, though measurable public impact remains unclear.</p>
Public Health and Safety	<p>Across all three countries, HEAT documented false claims that CO<sub>2</sub> is harmless or that extreme weather events are artificially engineered (e.g., via HAARP).</p>
<p><i>These narratives risk undermining public understanding of climate science and could reduce support for policy measures. While HEAT does not establish direct causality, the emotional tone and scale of dissemination suggest a significant role in shaping public perception.</i></p>	

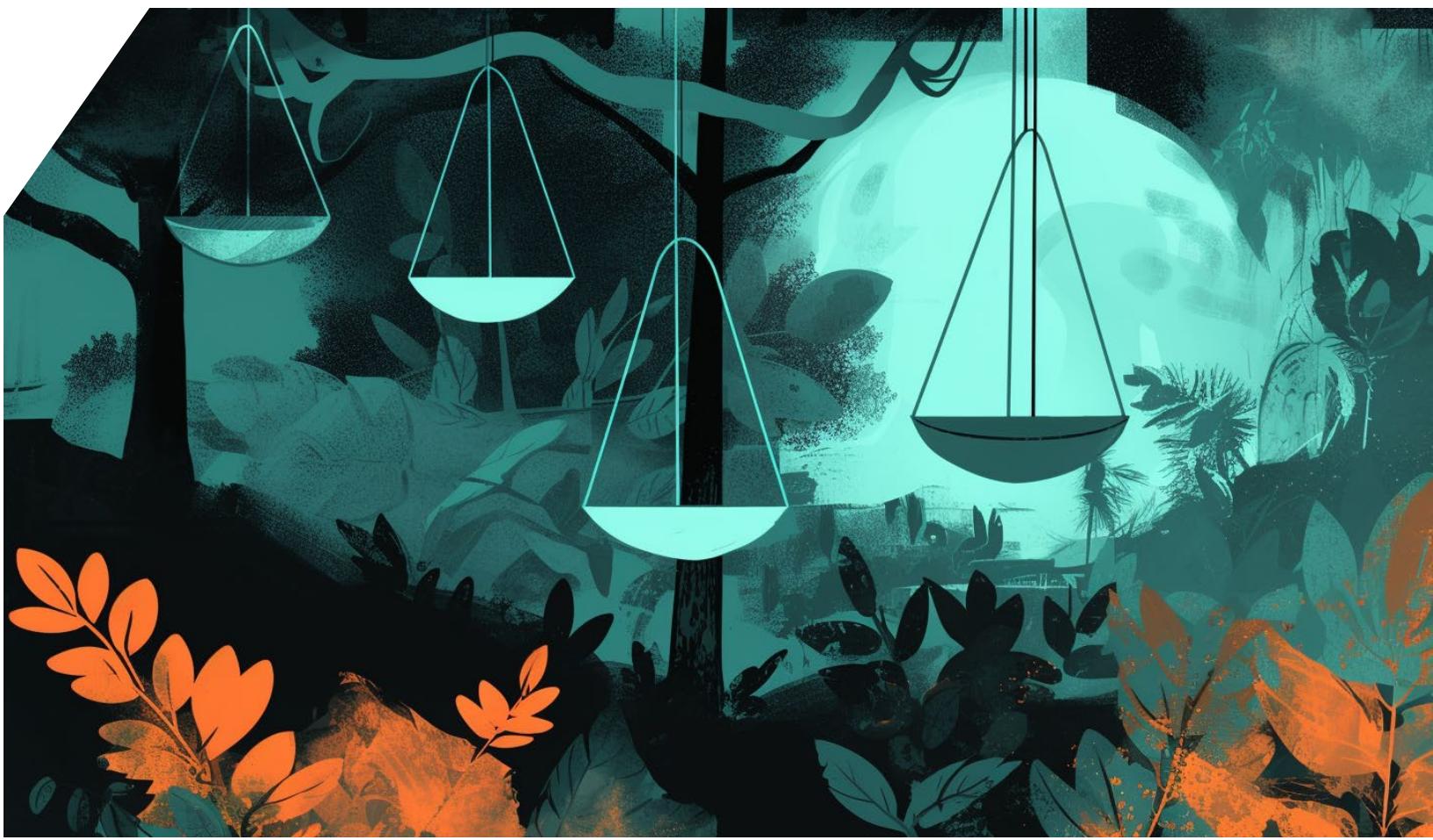
Figure 24. Disinformation examples documented by the HEAT project mapped to DSA systemic risk categories.

- **Weak Cross-Border and Multilingual Enforcement:** The HEAT investigation highlights how climate disinformation narratives—such as those disseminated by the Portal Kombat ecosystem—routinely migrate across borders and platforms, exploiting the EU's fragmented enforcement landscape. These narratives often reappear with minimal moderation in different languages and jurisdictions. Yet, under the current framework, platforms are not required to apply harmonised enforcement standards across member states, and the DSA offers no binding mechanism to coordinate cross-border responses. This regulatory gap enables persistent circulation of harmful content and weakens the EU's collective resilience to climate disinformation.
- **Transparency Gaps in Enforcement and Moderation Practices:** Although some platforms (e.g., Facebook, TikTok, Pinterest) voluntarily disclose selective actions, there is no binding requirement under the DSA for consistent, disaggregated reporting on content moderation, demonetisation, or algorithmic amplification related to climate disinformation. Critically, climate disinformation is not yet recognised as a category within the Statement of Reasons database (Article 17), though it could—and should—be incorporated to enable systematic tracking and oversight.

- **Under-Regulation of Greenwashing and Fossil Fuel Advertising:** Despite voluntary ad policies adopted by a few platforms (e.g., *YouTube*, *Pinterest*), the DSA currently imposes no formal restrictions on fossil fuel advertising. Nor does it require platforms to report how such content is moderated or monetised—aside from the general advertising transparency provisions in Article 39. This regulatory blind spot allows high-reach, interest-aligned narratives to persist with minimal scrutiny.
- **Lack of Safeguards Against Lawful but Harmful Climate Narratives:** While the DSA rightly protects lawful expression, the HEAT investigation exposes a critical risk gap involving actors who remain within legal boundaries yet consistently disseminate misleading or manipulative climate narratives. These include pseudo-academic organisations, partisan outlets, and influencers who frame disinformation as 'opinion', 'scientific debate', or 'critique'. Such narratives are harder to regulate yet have demonstrable intent and effect in undermining scientific consensus and public trust.

These actors often rely on:

- **Coordinated inauthentic behaviour** to amplify their messaging;
- **Platform recommender systems** to boost visibility;
- **Engagement-based monetisation models** that incentivise polarising content.



This content is not easily addressed under current DSA enforcement protocols, leaving platforms free to monetise and algorithmically amplify harmful but technically lawful narratives. The following illustrative cases (**Figure 25**) from the HEAT project highlight this gap in practice:

Country	Key Actors	Narrative Strategy & Framing
Germany	<i>EIKE</i>	Disseminated climate denial content on Facebook using pseudo-academic language. Posts challenged anthropogenic climate science, accused scientific bodies of data manipulation, and aligned messaging with far-right political actors such as the AfD.
France	<i>Sud Radio, Valeurs Actuelles</i>	Promoted climate-sceptic and conspiratorial content using emotionally charged framing. Narratives described climate policy as elite-driven, harmful to everyday citizens, and used derogatory labels such as “escrologistes.”
Netherlands	<i>Clintel, Wynia's Week</i>	Amplified climate scepticism through opinion-style articles. Framing presented CO <sub>2</sub> as beneficial and climate measures as alarmist. Narratives avoided outright falsehoods, invoking “scientific freedom” and economic critique to legitimise dissent.
<p><i>These examples underscore the urgent need for DSA-aligned risk assessment frameworks that address not only overt falsehoods, but also high-reach, high-impact content that deliberately erodes scientific consensus and public trust—while operating within legal boundaries. Such content, when amplified by recommender systems and monetised through engagement models, poses a systemic risk that current legislation does not adequately capture.</i></p>		

Figure 25. HEAT-documented cases of actors disseminating lawful but harmful climate disinformation.

Taken together, these gaps reveal how the current regulatory framework struggles to keep pace with the evolving dynamics of climate disinformation—particularly when narratives remain within legal bounds yet manipulate public perception at scale. In the next section, we explore how these gaps are further exploited through CIB tactics that extend the reach and influence of disinformation campaigns.

### CIB-Specific Regulation Gap

The HEAT investigation identified clear instances of CIB used to amplify climate disinformation narratives—particularly in Germany—through AI-generated profiles, synchronised reposting, and alignment with far-right ecosystems. These activities occurred across platforms, including Facebook and X.

While CIB is acknowledged in various EU strategic frameworks, notably the European Democracy Action Plan (EDAP), it remains undefined and unenforceable under current provisions of the DSA.

Specifically:

- **DSA Articles 34–35 mandate that VLOPs assess systemic risks** arising from the inauthentic use or automated exploitation of their services. However, the regulation does not provide a formal, uniform definition of Coordinated Inauthentic Behaviour as a distinct category.
- The **EDAP encourages safeguards against manipulative behaviours** such as inauthentic accounts and coordinated content amplification, but does not mandate specific enforcement on CIB.
- In certain circumstances, such as the existence of specific targeted security measures, CIB **could reasonably be considered to fall under the definition of access** without right to a computer system and prosecuted accordingly.<sup>40</sup>

As a result, platforms are left to independently define, interpret, and act on CIB, leading to fragmented enforcement, inconsistent thresholds, and wide discretion in platform accountability. This regulatory gap weakens the EU's capacity to respond to orchestrated disinformation operations that exploit platform architecture to distort public discourse on climate.

### 9.3 Platform failures in the EU

While several major platforms have adopted partial measures to address climate disinformation, including definitions, monetisation rules, or ad policies, the overall landscape remains incoherent, weakly enforced, and fragmented. Unlike the coordinated and rigorous responses deployed against COVID-19 disinformation or election-related threats, climate disinformation continues to be treated as secondary, with limited urgency and transparency. Despite these partial efforts, the platforms as a whole fall short in critical areas.

#### Persistent Failures and Structural Gaps <sup>41</sup>

- **Platform Definition of Climate Disinformation:** Only a few platforms apply explicit criteria. Others offer vague definitions—or none at all. For example, *YouTube* lacks a formal policy on climate disinformation for organic content, and *X* offers no relevant policy framework.
- **Inconsistent or missing content moderation tools:** In the EU, *Meta* platforms (*Facebook*, *Instagram*) apply visibility reduction techniques and content labels for posts deemed false by third-party fact-checkers. However, the moderation process remains opaque: users and researchers lack insight into how enforcement decisions are made, the criteria applied, and how this aligns with DSA-mandated obligations.
- **No Formal DSA-Aligned Reporting Channels for External Researchers:** During the HEAT investigation, a CIB network was discovered and reported via existing platform mechanisms. However, there is no official channel for civil society or researchers to report systemic risk content (e.g., CIB, greenwashing, high-volume narrative manipulation) in a way that aligns with DSA Article 34 expectations. This gap severely limits transparency, enforcement feedback, and structured collaboration.
- **Gaps in Enforcement Policies:** Key tools such as strike systems exist only on select platforms.

<sup>40</sup> Directive 2013/40/EU of the European Parliament and of the Council of 12 August 2013 on attacks against information systems and replacing Council Framework Decision 2005/222/JHA

<sup>41</sup> Sources cited in Section 9.3 section can be found in [Annex A Section 11.9](#)

- Pre-bunking interventions, commonly used for health or electoral disinformation, are largely absent in the context of climate narratives, despite mounting evidence of public harm.
- **Weak or Uneven Monetisation Rules:** While *Meta*, *TikTok*, and *YouTube* claim to restrict monetisation of flagged disinformation, enforcement remains opaque and inconsistent. These policies are not specifically tailored to climate-related content, and platforms rarely disclose how such rules are applied in practice.
- **Advertising Loopholes:** Climate disinformation is not considered a sensitive advertising category across most platforms. As a result, fossil fuel companies and their affiliates continue to publish paid content that downplays climate risk, misrepresents scientific consensus, or promotes greenwashed narratives with minimal scrutiny.<sup>42</sup>
- **Opaque Algorithmic Systems:** Platforms do not publicly disclose how their recommender systems affect the amplification or suppression of climate disinformation. These systems often prioritise emotionally charged or polarising content, leaving users with little visibility or control over how climate content is curated or delivered in their feeds.
- **Lack of Transparency on Takedown Actions:** There is no standard reporting mechanism for takedowns of climate disinformation content. Platforms do not systematically report the volume of removed content, the rationale for removal, or the outcomes of appeal processes, limiting external oversight and public accountability.
- **No Regular Data on Reach and Impact:** There is no consistent reporting on the reach, engagement, or real-world impact of climate disinformation across platforms. This lack of transparency restricts researchers' and regulators' ability to assess mitigation effectiveness and track systemic risk.
- **Enforcement Disparities Across Languages:** Content moderation efforts are predominantly focused on English. Languages spoken in Central and Eastern Europe are significantly under-enforced, creating vulnerabilities in regions already targeted by transnational disinformation campaigns.
- **Limited Action Against 'Lawful but Harmful' Actors:** Pseudo-academic organisations, ideological influencers, and partisan media outlets continue to disseminate misleading or denialist narratives that fall within platforms' terms of service. Platforms rarely adjust algorithms or monetisation systems to mitigate the reach and impact of this content.
- **Opaque Corporate Influence:** There is limited transparency around the sponsorship, funding, or organisational affiliations behind climate-related content, including that produced or amplified by fossil fuel interests.

These structural and enforcement gaps are illustrated through concrete examples identified in the HEAT investigation (**Figure 26**), which document how known disinformation actors repeatedly bypass moderation protocols across major platforms.

<sup>42</sup> Not all this content would qualify as outright 'disinformation' under platform rules, which often require fact-checker confirmation or scientific consensus denial.

Type of Gap	Description	HEAT Findings
Definition Gap	Platforms failed to act on misleading but technically lawful content due to vague or absent definitions of climate disinformation. Denialist content framed as “scientific debate” or “personal opinion” evaded moderation and classification under platform policies.	The Association of Climate Realists posted content on X attributing climate change to natural cycles, while Clintel promoted the narrative that CO <sub>2</sub> is beneficial on Facebook and X. Hashtags such as #Klimadiktatur, #klimaathoax, and conspiracy theories involving HAARP and geoengineering circulated widely across platforms.
Moderation Tools Gap	Automated systems failed to detect repeated narratives and coordinated inauthentic activity. No labelling, visibility reduction, or downranking was applied—even as disinformation spread rapidly.	A coordinated <i>Facebook</i> cluster used AI-generated accounts to amplify denialist narratives, while Dutch-language pages recycled memes and disinformation originally produced abroad. These narratives spread without detection or suppression through automated systems.
Enforcement Gap	Platforms did not penalise repeat offenders; enforcement protocols like takedowns or strike systems were inconsistently applied or entirely absent.	Known disinformation actors repeatedly posted climate denial content across multiple platforms without facing penalties. Even when coordination was evident or content was flagged, takedowns and account-level enforcement were lacking, allowing harmful actors to remain active and undeterred.

Figure 26. Cases of platform enforcement gaps on climate disinformation.

Together, these failures illustrate the inadequacy of the current platform-led, discretionary enforcement model. Despite clear evidence of harm, the lack of binding obligations and uneven application of existing tools allows climate disinformation to flourish. The following section examines the need to move beyond voluntary measures toward enforceable legal standards that ensure consistent, cross-platform accountability.

### Voluntary vs. Legal Obligations

While platforms like *Facebook*, *YouTube*, *TikTok*, *Instagram*, and *X* are signatories to the EU Strengthened Code of Practice on Disinformation—a voluntary but politically binding framework—they are not specifically obligated to address climate disinformation. Reporting is self-regulated, non-standardised, and varies widely in depth and frequency.

At the same time, these platforms are classified as VLOPs under the DSA and are legally required to assess and mitigate systemic risks. However, because climate disinformation is not yet recognised as a systemic risk under the DSA, platforms are not compelled to address it through enforceable mechanisms.

## The Case of Telegram: A Major Blind Spot

Telegram remains outside the DSA's VLOP regulatory scope, as it has not disclosed usage data surpassing the 45 million EU user threshold. Its encrypted, decentralised infrastructure and non-EU base pose additional challenges for enforcement. As a result:

- It is **not subject to transparency, oversight, or systemic risk mitigation** rules under the DSA.
- It functions as an **unregulated vector** for climate disinformation, particularly through public channels that enable fringe narratives and cross-platform mobilisation.

## Divergent Platform Approaches to CIB Enforcement

In the absence of a harmonised EU definition of CIB, platforms have implemented inconsistent and often opaque detection and enforcement practices. This has resulted in significant disparities in how climate disinformation campaigns are identified, removed, and reported.

**Figure 27** below illustrates the contrast in how major platforms define, allow reporting of, and disclose enforcement actions related to CIB:

Platform	Definition of CIB	User Reporting Mechanism	Takedown Transparency
Meta	Defines CIB as coordinated efforts using fake or misleading accounts to deceive users or evade enforcement.	No direct CIB reporting form. Users can report impersonation or fake accounts under the general Community Standards.	Publishes quarterly integrity reports. Often partners with researchers to describe dismantled networks and tactics.
X	Refers to CIB under broader terms like “coordinated harmful activity” or “platform manipulation.”	No CIB-specific report option. Users can report spam, fake identity, or abuse via the Help Centre.	No structured or routine reporting. Disclosures on CIB takedowns are rare or nonexistent.

Figure 27. Divergent CIB enforcement practices across platforms.

These structural inconsistencies—driven by differences in platform scale, legal obligations, and enforcement practices—underscore a fragmented regulatory landscape. The absence of harmonised definitions and transparent reporting mechanisms for CIB, along with enforcement gaps on platforms like Telegram, significantly undermines systemic resilience across the EU. To address these vulnerabilities and strengthen the EU's climate disinformation response, the following section outlines targeted recommendations for policymakers, platforms, and civil society actors.

## 9.4 Recommendations

EU institutions and national governments must treat climate disinformation as a strategic threat—not only to environmental goals but also to democratic legitimacy and the broader stability of European societies. It spreads harmful falsehoods that undermine trust in science, weaken public preparedness, fuel social tensions, and distort civic debate. These impacts erode institutional trust and democratic participation, influencing how people vote or engage with policies. Addressing this threat requires an urgent, coordinated response from regulators, platforms, and civil society.

### Recommendations for Policymakers

#### Targeted Regulatory Actions:

- **Recognise climate disinformation as a systemic risk:** Ensure that the report required under Article 35.2 of the Digital Services Act (DSA) explicitly includes climate disinformation as a recurrent and significant systemic risk—on par with threats to democratic processes, public health, and civic discourse.
- **Mandate granular platform transparency:** Strengthen Article 40 by requiring platforms to disclose metrics on prevalence, reach, moderation actions, virality, and takedowns related to climate mis- and disinformation and CIB, disaggregated by language, region, and platform.
- **Include climate disinformation in risk assessments:** Enforce Article 34(1)(c) by requiring VLOPs to explicitly assess the role of recommender systems in spreading climate disinformation. Mandate independent audits and empower users with tools to reduce exposure.
- **Enforce content-specific transparency obligations:** Introduce binding requirements for reporting climate-related enforcement actions, takedown volumes, and algorithmic amplification metrics, with regional and linguistic breakdowns.
- **Align national oversight with EU-wide strategies:** Ensure regulatory monitoring mechanisms remain tailored to national contexts while supporting a unified EU-level approach to cross-border disinformation.
- **Regulate misleading fossil fuel advertising:** Ban or tightly regulate fossil fuel advertisements that misrepresent climate science or downplay risks. At a minimum, such ads must meet political advertising standards during election cycles.
- **Establish an EU Observatory on Climate Disinformation:** Create a dedicated body to monitor climate disinformation trends, audit platform performance, and issue alerts. This observatory should integrate expertise from civil society, academia, regulatory agencies, and climate science.

#### Coordination Measures:

- **Develop rapid response mechanisms:** Enable quick mobilisation against disinformation surges during periods of high vulnerability—such as extreme weather events, policy rollouts, or international climate summits.
- **Incorporate climate disinformation into hybrid threat frameworks:** Recognise and address climate disinformation as a strategic hybrid threat within EU policy instruments, including the Strategic Compass, to bolster democratic resilience and policy coherence.

Policymakers alone cannot counter the scale and complexity of climate disinformation. As the primary hosts and amplifiers of this content, online platforms must assume greater responsibility in protecting the integrity of climate discourse. The following section outlines the operational reforms and transparency measures platforms require to reduce harm and restore trust meaningfully.

### Recommendations for Platforms

Social media platforms must apply the same urgency and consistency to climate disinformation they applied to COVID-19-related content. This means proactive, coordinated, and transparent enforcement. To meet this standard, platforms should adopt the following reforms:

- **Develop and enforce comprehensive climate disinformation policies** across all content types, expanding beyond partial measures and ad restrictions to include moderation protocols, strike systems, and enforcement transparency.
- **Expand fact-checking and moderation capacity** across European languages to address enforcement disparities.
- **Provide disaggregated transparency reporting** on climate-related takedowns, narrative engagement and reach, and the monetisation of false or misleading content.
- **Demonetisation of repeat disinformation actors and borderline content** that manipulates science or undermines climate mitigation.
- **Downrank false or misleading climate content algorithmically**, particularly in trending and recommendation systems.
- **Audit and adjust recommender systems** to reduce the amplification of climate disinformation. Disclose how climate-related content is prioritised and offer users meaningful control.
- **Enforce existing rules against CIB** that are used to amplify climate disinformation campaigns. **Report state-linked, commercial, or ideologically driven CIB** campaigns to relevant enforcement bodies
- **Ban or restrict fossil fuel advertising** that misrepresents scientific consensus or promotes greenwashing. At a minimum, treat such ads as political content subject to additional scrutiny during election cycles.

Tackling climate disinformation demands a whole-of-society response. While platforms and regulators are central, researchers and civil society actors are equally critical to exposing harms, driving accountability, and building resilience at scale.

### Recommendations for Researchers and Civil Society

Academics, investigative journalists, independent researchers, and civil society actors play critical roles in surfacing emerging threats, engaging vulnerable groups, and strengthening institutional and community resilience. Their insights are essential for driving accountability, informing EU policy, and ensuring climate disinformation is addressed at every level—from regulatory institutions to grassroots mobilisation.

To support these goals, researchers and civil society should:

- **Map the evolution and spread of narratives across platforms**, including identification of manipulation tactics and coordinated inauthentic behaviour (CIB) patterns.
- **Conduct and publish independent audits** of platform enforcement gaps to increase transparency and pressure for reform.
- **Identify and expose transnational amplifier networks**, including those linked to hostile state actors and fossil fuel-aligned lobbying campaigns.
- **Create culturally resonant counter-narratives**, leveraging vernacular language, memes, short-form videos, and storytelling tailored to specific communities.
- **Collaborate with at-risk communities**, particularly rural and working-class populations, to build trust, engagement, and long-term resilience.
- **Advance media and digital literacy**, using both formal education and community-led initiatives to help audiences better recognise and respond to climate disinformation.

Civil society must be embedded as a co-stakeholder within the EU's regulatory response. Mechanisms established under the Digital Services Act—such as transparency reporting and complaints channels—should be strengthened to facilitate harm flagging, co-create content standards, and enable real-time detection of emerging risks.

**Figure 28** below summarises how these recommendations can be applied across distinct national contexts, highlighting country-specific disinformation dynamics and tailored responses for Germany, France, and the Netherlands.

Country	Key context	Recommendations
Germany	Climate disinformation is increasingly mainstreamed through AfD-aligned actors, combining denialist content with broader anti-democratic rhetoric. Pseudo-academic influencers and coordinated inauthentic networks exploit narratives around economic hardship, energy policy, and institutional distrust.	Platforms should be required to report transparently on German-language enforcement and algorithmic amplification. Climate disinformation should be formally recognised as part of democratic resilience strategies. National campaigns should expand media literacy and pre-bunking efforts in rural and working-class areas.
France	Climate disinformation frequently intersects with anti-elite and conspiratorial narratives, using EU climate policies as symbols of technocratic overreach. Disinformation is often coordinated via alternative platforms like <i>Telegram</i> .	Monitoring and enforcement should be enhanced on fringe platforms popular among French-language actors. Disaggregated French-language enforcement data must be made public. National hybrid threat strategies should incorporate climate disinformation response mechanisms.
Netherlands	Anti-climate narratives are mobilised through campaigns tied to farmer protests and populist movements, exploiting grievances around EU environmental regulations. These narratives are amplified by both domestic and cross-border actors.	National coordination should be improved across agriculture, environment, and digital ministries to tackle disinformation. Dutch-language enforcement parity should be ensured across platforms. Targeted communication and pre-bunking strategies should accompany policy changes affecting rural groups.

Figure 28. Country-level contexts and regulatory recommendations.

## 10. CONCLUSION

### 10.1 Summary of Core Insights

The HEAT project represents a first-of-its-kind, cross-national investigation into how climate-related MDM narratives take root, evolve, and circulate within and across European digital ecosystems. By focusing on three strategically selected countries—Germany, France, and the Netherlands—the project has shed light on core insights into the actors, platforms, and techniques that shape climate disinformation in different sociopolitical contexts.

Several core insights have emerged. **First, the persistence and pervasiveness of conspiratorial climate narratives**, especially around geoengineering and HAARP, reflect a deep undercurrent of distrust in institutions, science, and climate governance. Though fringe in origin, these narratives have migrated into more mainstream spaces, aided by both domestic and foreign amplification.

**Second, the culture war framing of climate policy**, seen in partisan attacks, populist backlash, and slogans portraying climate action as authoritarian or elitist, has become a powerful vector of climate scepticism. This is especially potent when intersecting with national anxieties around economic stability, agricultural identity, or regional autonomy.

**Third, Russia-linked *Portal Kombat* played a verified role in amplifying climate disinformation** across German, French, and Dutch channels. Its strategy of rebranding international content for local audiences and using *Telegram* and low-engagement *Facebook* copypasta illustrates a low-cost, agile model of narrative laundering that can scale quickly across borders.

**Fourth, direct evidence of Big Oil-led disinformation remains limited.** While narratives aligned with fossil fuel interests were prominent, particularly in opposition to green transitions, these lacked direct corporate attribution and were typically diffused through partisan or ideological networks.

These findings underscore the need for targeted platform accountability and harmonised regulatory responses at the EU level. Building on its cross-national scope, the HEAT project offers new strategic value by mapping how shared disinformation frames interact with local sociopolitical conditions. This dual lens enables policymakers to design context-aware responses at the member state level, while also informing coordinated EU-wide action under the DSA.

### 10.2 Reflection on Methodology and Findings

Methodologically, this project demonstrates the value of a hybrid OSINT approach that integrates Boolean logic, narrative clustering, AI-enhanced triage, and analyst-driven validation. The workflow successfully identified both high-visibility narratives and emerging low-visibility threats, laying the foundation for improved early warning and response systems across the EU.

The HEAT project shows that addressing climate disinformation requires parallel action from policymakers, platforms, and civil society. It provides the evidence base for defining climate

disinformation as a systemic risk, auditing algorithmic amplification, and empowering public-interest actors to hold platforms accountable. Without coordinated reforms across these levels, climate disinformation will continue to undermine both environmental progress and democratic resilience in Europe.

Ultimately, this report calls for a shift in how climate disinformation is understood, not just as a science communication challenge, but as a multi-platform, multi-actor threat to democratic resilience. The findings presented here aim to support the EU in building coordinated, cross-sector responses to protect both environmental progress and information integrity.

### 10.3 Future Research Needs

While HEAT offers a robust snapshot of the climate MDM landscape, several gaps and opportunities remain for further study:

- **Platform Ecosystem Expansion:** *TikTok*, *YouTube*, and fringe forums remain under-monitored. Their role in narrative seeding and youth-targeted climate disinformation merits deeper investigation.
- **Encrypted & Closed Network Analysis:** Private *Telegram* groups, *WhatsApp*, and *Discord* likely harbour significant MDM activity. Secure, ethical research pathways are needed to access these spaces.
- **Narrative Trajectory Tracking:** Future research should trace how specific narratives (e.g., 'climate lockdowns') evolve across elections, protests, and policy cycles.
- Mitigation Impact Assessment:** As the EU and platforms roll out new counter-disinformation strategies, it is vital to evaluate what works, for whom, and under what conditions.
- **Actor Typologies and Motivations:** A more granular typology of climate MDM actors, across ideological, financial, and geopolitical axes, would aid targeted intervention design.

These research priorities are essential to inform evidence-based regulation and strengthen the EU's long-term response to climate disinformation. The HEAT project lays critical groundwork, but tackling climate disinformation will require sustained, interdisciplinary, and multi-stakeholder collaboration across Europe.

## 11. ANNEX A: TECHNICAL METHODOLOGY & LIMITATIONS

### 11.1 Seven-Stage Implementation Process

This section outlines the methodology used to conduct the investigation, drawing on Logically's established 7-stage implementation process. The approach was adapted specifically for the EMIF project to ensure transparency, reproducibility, and alignment with OSINT best practices.

The methodology integrates AI-powered tools, multilingual data collection, and expert human analysis to map the full lifecycle of climate-related MDM narratives—starting from project scoping and risk assessment, through to data segmentation, narrative threat analysis, and final reporting. Each stage builds on the last to create a coherent and efficient research pipeline.

#### *Stage 1 – Commissioning*

- Define the scope of the investigation, including geographies, platforms, languages, and target demographics.
- Formalise client requirements and align on timelines, deliverables, and expected outcomes.
- Complete a GDPR-compliant risk assessment and data protection evaluation.

#### *Stage 2 – Preliminary Research & Data Collection*

- Analysts conduct a literature review and define data collection parameters.
- Multilingual Boolean searches are deployed, geo-fenced to each relevant European country.
- A dedicated Situation Room for each country is established using Logically Intelligence to ingest data from multiple platforms, including *X, Facebook, Instagram, Telegram, TikTok, YouTube, Reddit, 4chan, 8kun, Tumblr*, and a range of mainstream and fringe news sites.

#### *Stage 3 – Narrative Segmentation*

- Identify and categorise harmful climate-related MDM narratives.
- Segment narratives by country and audience group to highlight patterns of vulnerability and amplification.

#### *Stage 4 – Threat Assessment*

- Evaluate the potential impact of each narrative on key demographics and information ecosystems.
- Assess narrative reach, resonance, and potential for societal or political disruption.

### Stage 5 – Deep-Dive Analysis

- Track narrative development across platforms and over time.
- Conduct attribution analysis and deploy Logically's proprietary AI tools to detect Coordinated Inauthentic Behaviour (CIB), enabling a deeper understanding of actor networks and tactics.

### Stage 6 – Analytical Write-Up

- Synthesise findings into a structured, audience-ready report.
- Integrate data visuals, narrative insights, and input from subject matter experts in policy, data science, and government affairs to ensure clarity and relevance for both technical and non-technical readers.

### Stage 7 – Quality Assurance (QA)

- Conduct internal QA review by Senior Analysts and the VP of Research.
- Final review by the Delivery Lead and Project Manager ensures alignment with project goals and audience needs.
- Findings are shared with EU DisinfoLab for peer review before submission to EMIF for final feedback and approval.

## 11.2 Boolean-Based Collection

Where actor-based access was limited or infeasible (e.g., *Facebook* groups, *Telegram*), Boolean dashboards were deployed. Keyword lists were informed by the **CARDS project**'s MDM taxonomy and refined iteratively. OSINT analysts applied exploratory digital ethnographic methods to validate hits and manually adjust filters as needed.

Both approaches captured content from:

- Social media (X, *Facebook*, *Instagram*)
- Messaging apps (*Telegram* public channels)
- Fringe networks (alt-blogs, conspiracy forums)
- Mainstream and partisan media
- Multimedia platforms (*YouTube*, *TikTok*)

This ensured broad coverage across discourse types, platforms, and audience segments.

### 11.3 Platforms and Sources

The digital information environment varied significantly across the three countries. The following platforms were prioritised:

- **Social Media:** *X, Facebook, Instagram*
- **Encrypted Messaging:** *Telegram* public channels (limited access until April 2025), *WhatsApp* (public only)
- **Alternative Media & Blogs:** *EIKE, Ongehoord Nederland, FDESouche, Clintel*, others
- **News Outlets:** National and regional newspapers (*Le Figaro, NRC, Bild*), as well as partisan sites
- **Multimedia Platforms:** *YouTube, TikTok, Rumble*

This cross-platform lens allowed the team to map how narratives moved between mainstream, alt-tech, and encrypted ecosystems.

## 11.4 Boolean Search Queries

### Germany Boolean Query (Broad)

```

((Klima* OR Erderwärmung OR Erderhitzung
OR
CO2* OR C02 OR "CO-2" OR Kohlendioxid OR Kohlenstoffdioxid OR Treibhauseffekt OR
Treibhausgas*
OR
Energiewende OR Dekarbonisierung OR "Net Zero" OR Kohleausstieg OR "Green Deal" OR
"Grüne Transformation" OR Emissionshandel*
OR
Biokraftstoff* OR Bioenergie* OR "grüne Energie" OR "erneuerbare Energie" OR "erneuerbare
Energien" OR "regenerative Energien" OR Solarstrom OR Solarenergie OR Sonnenenergie OR
Solaranlage* OR Windenergie* OR Windkraft OR Windräder OR Windstrom OR Windparks OR
"e-Fuels" OR eFuels OR Wasserkraft OR Dunkelflaute OR "fossile Brennstoffe" OR "Fossile
Brennstoffreserven" OR Ökostrom OR "Grüner Strom" OR "Alternative Energien"
OR
((elektrisch* OR "emissionsfrei" OR "Plug-in") AND ((Auto* OR SUV OR Bus OR LKW) OR
("E-Autos" OR "E-Auto" OR eAuto* OR "E-Mobile" OR "E-Bus" OR "E-Busse" OR
Elektrofahrzeug* OR Elektroauto* OR #Elektroautos OR "elektrische Autos" OR Elektrofahrzeuge
OR "E-Fahrzeuge" OR "E-Fahrzeug" OR "E-mobil")))
OR
COP2* OR COP3* OR "Übereinkommen von Paris" OR "UN-Klimakonferenz"
OR
HAARP* OR geoengineering OR Wettermanipulation* OR Wetterbeeinflussung OR Wetterwaffe*
OR chemtrails)
NOT ("politisches Klima" OR "politische Klima" OR "politischen Klima" OR "wirtschaftliche Klima"
OR "wirtschaftliches Klima" OR "Klima des Vertrauens"))

```

### France Boolean Query (Broad)

```

(climatique* OR climat
OR
CO2 OR C02 OR "dioxyde de carbone" OR "gaz carbonique" OR "gaz à effet de serre" OR
"Réchauffement" OR "mensonges sur le climat"
OR
"zéro émission" OR "net zero" OR "taxe carbone" OR "Transition énergétique" OR émissions
OR ("énergie renouvelable" OR "énergies renouvelables" OR "énergie propre" OR "énergies
propres" OR biocarburant*) OR ((energie OR L'énergie) AND (solaire OR éolienne* OR
hydraulique OR géothermique OR biomasse OR "hydrogène vert" OR "développement
durable"))
OR ((électriques) AND (véhicule* OR voiture* OR bus OR Camion OR Moto OR Scooter OR
Velo OR Bicyclette)) OR ("e-car")
OR Tesla OR ZFEs OR "Zone à Faible Emissions" OR "roulant en électrique" OR "transport
vert" OR "véhicule hybride"
OR
COP29 OR #ClimatEscroquerie OR #fraudeclimatique OR
COP2* OR COP3* OR "niveau de la mer" OR "Accord de Paris" OR NOAA OR "accord de
Kyoto" OR "objectif de durabilité" OR "transition juste" OR "incendies de forêt"
OR chemtrails OR HAARP OR "géo-ingénierie" OR (manipulation AND temps))
NOT ("climat politique" OR "climat économique")

```

## Netherlands Boolean Query (Broad)

```
(klimaat* OR "opwarming van de aarde" OR CO2* OR koolstofdioxide OR Kooldioxide OR
broeikasgas
OR
"Net zero" OR "nul emissie" OR koolstofbelasting OR energietransitie OR emissies OR
"duurzame ontwikkeling"
OR
Biobrandstof OR "Bio-energie" OR "groene Energie" OR "hernieuwbare Energie" OR
"hernieuwbare Energien" OR "regeneratieve Energien" OR "Zonne-energie" OR
Zonneenergie OR Windenergie OR "Wind-Energie" OR Windenergie OR Windkracht OR
Windturbines OR Windmolens OR Windstroom OR Windparken OR "e-Fuels" OR eFuels
OR Waterkrachtw OR Getijdenenergie OR "Duurzame energie" OR biobrandstof OR
biobrandstoffen OR "Geothermische energie"
OR
(((electrisch* OR "plug-in") AND (voertuigen OR auto* OR bus OR bussen OR wagen)) OR
(EV OR "E-auto" OR "E-bus" OR "e-Auto's"))
OR
COP2* OR COP3* OR "Overeenkomst van Parijs" OR "Akkoorden van Parijs" OR
"VN-klimaatconferentie"
OR
HAARP OR "geo-engineering" OR weermanipulatie OR weermodificatie OR chemtrails)
NOT ("politiek klimaat" OR "politieke klimaat" OR "economische klimaat")
```

## 11.5 Limitations

While the methodology is robust, several limitations affected the scope and consistency:

- **Telegram Access Delays:** Historic access to *Telegram* was not enabled until April 2025, leading to inconsistent time-series coverage.
- **GDPR and Platform Restrictions:** Due to access limitations, *Facebook* group data was excluded, and individual profile data was minimised.
- **Language Filters:** Some fringe terms and coded language may have escaped keyword-based searches, especially in conspiratorial and ideological clusters.
- **Actor Anonymity:** Many disinformation actors operate under pseudonyms, making attribution challenging.
- **Geospatial Data Gaps:** Geofencing was not used; geographic attribution relied on language patterns, content focus, and actor bios.

Despite these constraints, the combined OSINT and data science workflow delivered a high-confidence view of Europe's climate disinformation landscape.

- Boolean queries and search methodology
- Actor seed lists (by country and platform)
- Volume/engagement summary tables
- Key timeline events
- Topic modelling output summaries
- Links to supporting files (if public release is permitted)

## 11.6 Fact-Check Summaries for Key Disinformation Themes

The following fact-checks address the most consequential climate-MDM narratives surfaced by our cross-country topic modelling and platform analysis. Two narratives appear consistently across the three national datasets:

- **'Geoengineering' conspiracies** that attribute floods, droughts, or storms to clandestine aerosol spraying or HAARP-style weather-modification programmes.
- **The 'no climate emergency' petition**, widely promoted as proof that 1200 supposed 'scientists' reject mainstream climate science, was used to discredit the IPCC and advance pro-CO<sub>2</sub> rhetoric.

In addition to these, country-level analysis of datasets identifies the single most dominant climate-MDM narrative in each national discourse:

- **Germany – ‘Energiewende + Heizungsgesetz will bankrupt households and de-industrialise the economy.’** The claim alleges that Germany’s energy transition policy (*Energiewende*) and the Building Heating Act (*Heizungsgesetz*) will lead to widespread household bankruptcies and cause the de-industrialisation of the German economy. It portrays climate policies as economically ruinous and socially destabilising.
- **Netherlands – ‘The nitrogen “crisis” is a government hoax to confiscate farms (“No Farmers No Food”).** The claim asserts that the Dutch government’s framing of a nitrogen ‘crisis’ is a fabricated pretext to confiscate farms, often expressed through the slogan forcibly. It suggests a deliberate agenda to dismantle traditional agriculture in favour of state control or corporate interests.
- **France – ‘ZFEs and 15-minute-city plans are stealth ‘climate lockdowns’ that trap ordinary drivers.’** The claim alleges that ZFEs and 15-minute-city initiatives are covert forms of ‘climate lockdowns’ designed to restrict personal freedom. It suggests these policies aim to control citizens’ movement by targeting ordinary drivers under the guise of environmental action.

These themes are flagged for fact-checking because they (i) **span the most significant clusters by volume and engagement**, (ii) carry clear, verifiable claims, and (iii) show strong spill-over into upcoming electoral and policy milestones. The table on the next page details each claim, its provenance, existing debunkings, and recommended counter-messaging.

## 11.7 Fact-Check Table

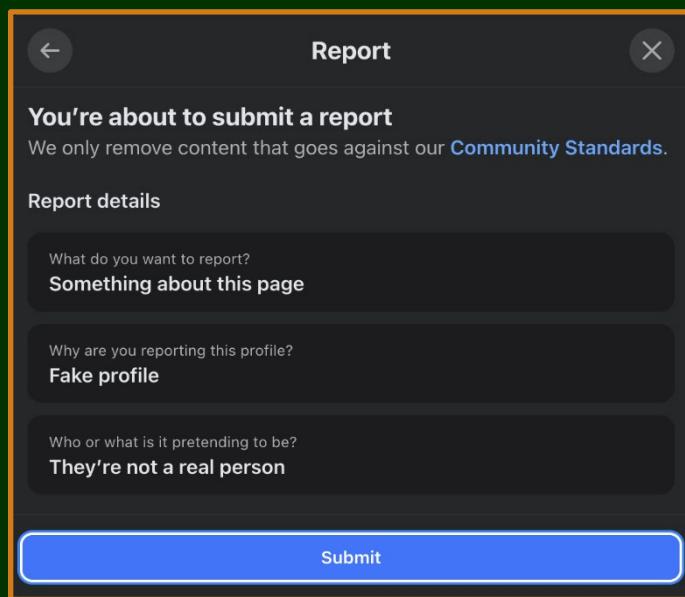
#	False or Misleading Claim	First Viral Appearance	Previous Fact-Checks (hyperlinked)	Concise Rebuttal
1	'Geo-engineering / chemtrails manipulate Europe's weather and cause extreme events.'	DE & NL Telegram 2019–20 → spike after Storm 'Zoltan' (2024).	<a href="#">BBC</a> <a href="#">Logically Facts</a> <a href="#">Nieuwscheckers</a>	Jet contrails are water-vapour; no evidence of HAARP or aerosol weather control in Europe.
2	'No climate emergency – 1200 "scientists" prove CO <sub>2</sub> is harmless.'	Clintel petition 2023; boosted by AfD, FvD, Reconquête.	<a href="#">Euronews</a> <a href="#">Logically Facts</a> <a href="#">PolitiFact</a>	Petition signatories are mostly not climate specialists; IPCC relies on thousands of peer-reviewed studies.
3	'Habeck's Heizungsgesetz forces every German to replace boilers – €100,000 per house.'	FB memes Apr 2023; resurfaces before 2026 rollout.	<a href="#">Correctiv</a> <a href="#">Environmental</a> <a href="#">Action Germany</a> <a href="#">(Deutsche Umwelthilfe)</a>	As per Heizungsgesetz/Germany's Building Energy Act, only heating systems over 30 years old must usually be replaced, with subsidies available for climate-friendly alternatives.
4	'Dutch nitrogen crisis is a hoax – the government will seize farms for migrants & highways.'	Dutch tractor blockades 2024-25	<a href="#">AAP</a> <a href="#">Logically Facts</a>	The Dutch nitrogen crisis is scientifically established; farm reductions aim to meet EU environmental laws, not to seize land for migrants or highways.
5	'ZFEs ban petrol cars for workers while elites keep SUVs.'	'Stop ZFE' FB groups mid-2023; EU-election memes 2024.	<a href="#">AFP</a> <a href="#">Factual</a> <a href="#">Logically Facts</a>	France's ZFE rules target high-emission vehicles, not social class; many SUVs comply, and exemptions and subsidies support lower-income workers.

## 11.8 Platform Reporting Limitations

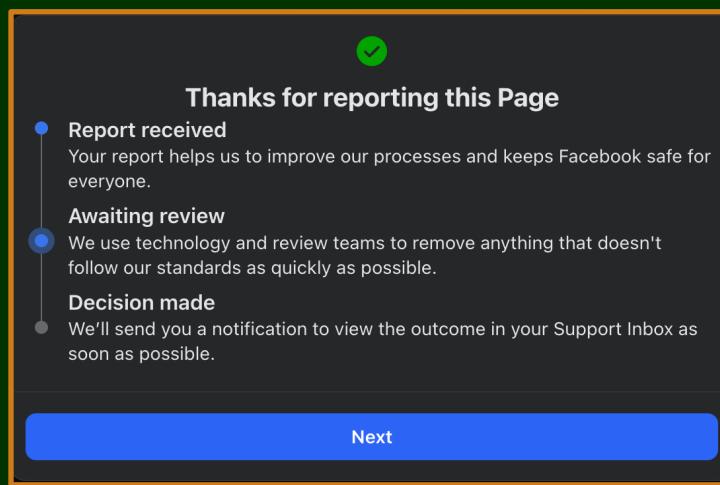
As part of the HEAT project's investigation into CIB on *Facebook*, **analysts manually reported 10 accounts** exhibiting CIB-like characteristics, including AI-generated profile images, irregular posting intervals, and identical or near-identical climate disinformation content.

However, *Facebook*'s in-platform reporting system offers **no option to flag content or accounts as part of a coordinated network or disinformation campaign**. The only available reporting categories relevant to CIB-style behaviour are "Fake Profile" or "Impersonation." Analysts were therefore forced to report accounts using the "Fake Profile" category, despite the underlying concern being systemic manipulation and coordinated behaviour — an issue clearly recognised under Article 34 of the DSA.

The images below (**Image A** and **Image B**) illustrate this limitation in *Meta*'s user reporting interface. They demonstrate the absence of a reporting pathway aligned with the DSA's systemic risk framework, particularly for civil society actors seeking to report CIB related to climate disinformation.



*Image A: Facebook reporting interface showing "Fake Profile" as the only available option for reporting CIB-like behaviour.*



*Image B: Facebook confirmation screen after submission stating that the reporting user will receive a notification to view the outcome of the report.*

## 11.9 Source List for Chapter 9 Section 2

This section compiles key sources referenced throughout the report, particularly those cited in **Chapter 9.2** regarding platform policies, disinformation studies, and climate-related regulatory frameworks. Included here for transparency and ease of access, these materials support the report's analysis but are listed separately.

- [EU DisinfoLab – Platforms' Policies on Climate Change Misinformation \(2023\)](#)
- [EU DisinfoLab – CIB Detection Tree \(2024\)](#)
- [CAAD – Underprepared and Underperforming Report \(2023\)](#)
- [InfluenceMap – Big Oil's Digital Ad Playbook \(2021\)](#)
- [InfluenceMap – Climate Misalignment of Big Tech Ad Services \(2023\)](#)
- [Global Witness – Ads for Fossils \(2022\)](#)
- [Global Witness – Greenwashing the Globe \(2023\)](#)
- [DeSmog – Big Oil's Greenwashing Hits the Classroom \(2023\)](#)
- [DeSmog – Fossil Fuel Advertising and Sponsorship Database \(accessed June 2025\)](#)
- [Meta Transparency Center \(accessed June 2025\)](#)
- [Meta Business – Fact-checking Policy \(accessed June 2025\)](#)
- [Google Ads – Misrepresentation Policy \(accessed June 2025\)](#)
- [YouTube Advertising Policy – Ineligible Content \(accessed June 2025\)](#)
- [TikTok Community Guidelines \(accessed June 2025\)](#)
- [TikTok Advertising Policies \(accessed June 2025\)](#)
- [X / Twitter Ads Content Policy \(accessed June 2025\)](#)
- [Twitter Blog – Climate Ad Ban Announcement \(2022\)](#)
- [Pinterest – Climate Misinformation Policy Announcement \(2022\)](#)

# HEAT

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