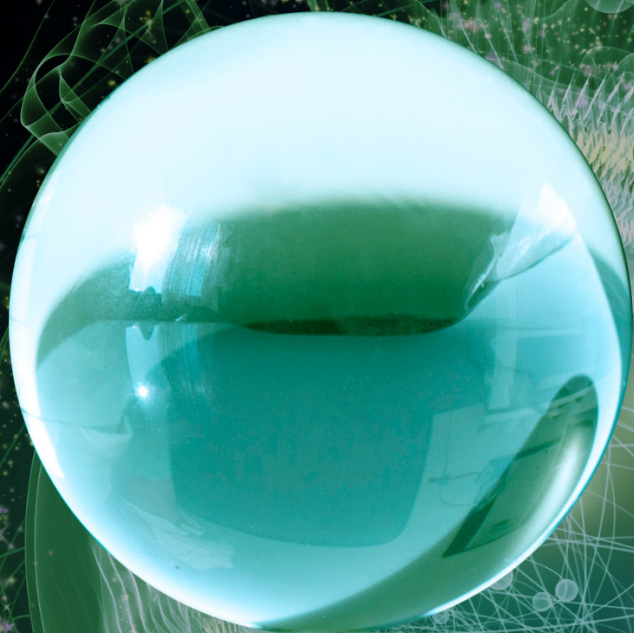


iab. AI Transparency and Disclosure Framework



August 2026

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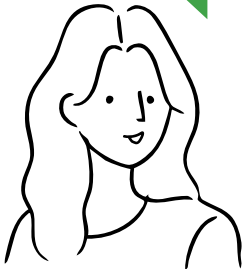
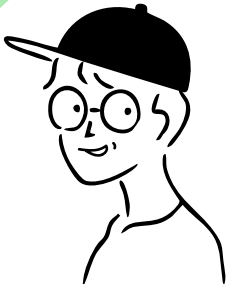
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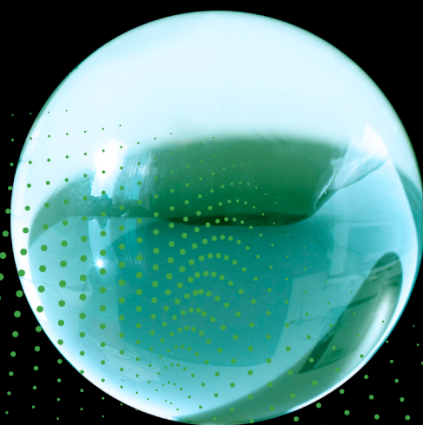
Maximize this Playbook

How can I use AI to get the most out of this playbook?

Put it into the AI platform of your choice to get your specific interest quickly with prompts like:
What AI uses in advertising require disclosure to consumers?



Executive Summary



iab. AI Transparency and Disclosure Framework

Executive Summary

Artificial intelligence has transformed advertising production at unprecedented speed, with AI-driven tools moving from experimental pilots to widespread adoption across creative workflows, enabling marketers to generate product imagery, synthetic voiceovers, video avatars, and large-scale personalized content. This framework applies specifically to advertising and marketing communications, including paid, sponsored, or brand-controlled content. It does not extend to organic social media, editorial journalism, or entertainment content unless those assets are used or repurposed as advertisements. This rapid AI integration creates both opportunity and risk; opportunity to reduce costs and expand creative output, and risk of consumer mistrust, operational inconsistency, and regulatory exposure.

This framework looks to balance both that opportunity and risk by providing clear, actionable guidance to answer five essential questions:

1. Do we disclose AI use in advertising creative?
2. When?
3. How?
4. To whom?
5. Who is responsible?

Why Disclosure Matters Now

Inconsistent disclosure practices in GenAI advertising creative are fragmenting trust. Some campaigns label even minor AI involvement, while others disclose nothing unless legally mandated, creating confusion and "label fatigue" where audiences ignore disclosures entirely. Consumer expectations compound the challenge. Research shows [broad majorities want transparency](#) when AI is used, yet disclosure practices remain inconsistent across the industry. [An IAB study](#) found that advertisers significantly overestimate how consumers feel about AI in ads: 82% of advertisers believe consumers feel positive about AI-generated ads, nearly double the 45% of consumers who actually do—and that gap has widened since 2024. Millennial and Gen Z sentiment is especially mixed, with 34% describing brands that use AI in ads as "creative" and 30% calling them "inauthentic." This disconnect highlights why transparent and consistent disclosure is crucial, not to discourage AI use, but to foster the trust necessary for responsible adoption. Meanwhile, regulatory pressure intensifies as the EU AI Act's transparency obligations took effect August 2, 2026, and U.S. states are enacting targeted legislation. Additionally, major platforms have taken early steps in implementing their own AI labeling approaches.



Key Findings and Recommendations

This framework establishes a **risk-based, two-layer disclosure model** that balances transparency with operational feasibility.

IAB establishes these disclosure thresholds as **industry best practices** for responsible AI transparency. While adoption is voluntary, organizations that implement this framework position themselves as industry leaders, reduce regulatory risk, and build stronger consumer trust. This framework does not carry enforcement authority; rather, it provides guidance to help the industry self-regulate effectively. While transparency about AI use encourages consumer trust, disclosure does not exempt advertisers from compliance with laws prohibiting deceptive, unfair, or harmful advertising practices.



iab. AI Transparency and Disclosure Framework

Consumer-facing disclosures are required only when AI materially shapes content in ways that could mislead a reasonable consumer about authenticity, identity, or representation.

Consumer-Facing Disclosures

Synthetic Image or Video

Images or videos generated by prompt where human input is limited to refinement, editing, or compositing.

Synthetic Voice (Living) - Fabricated Statements

AI-generated voice of living persons depicting events, actions or circumstances that never occurred as distinct from scripted commercial endorsements or brand messaging.

Synthetic Voice of Deceased Person

AI-generated voices of deceased persons creating new statements they never actually made.

Synthetic Avatar

Photorealistic synthetic humans (fully AI-generated entities) in primary roles.

Digital Twin (Deceased Person)

Digital twins of deceased individuals in any capacity, even with estate authorization.

Digital Twin (Living Person) - Fabricated Actions

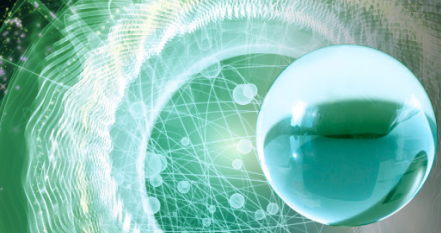
Digital twins of living individuals depicted in specific events, scenarios, or locations that never occurred, as distinct from standard product endorsements or brand representation.

Conversational Agent in Ads

AI chatbots or conversational agents in ads that simulate human interaction.

Disclosure is not required for standard production techniques including, but not limited to, routine post-production, obviously stylized characters, or uses where AI serves as a tool, much as prior traditional tools would, without altering consumer perception of authenticity.

Machine-readable metadata accompanies AI-involved assets, using Coalition for Content Provenance and Authenticity (C2PA) content credentials, an emerging open standard for embedding provenance information. This includes both standard provenance fields and IAB-specific fields that record whether disclosure is required and whether a label was applied. This metadata enables verification, audit, and platform enforcement to determine whether consumer-facing disclosure is required. More detail on these fields and implementation is provided in the Operational Framework.



iab. AI Transparency and Disclosure Framework

Accountability rests with advertisers (brand and/or agency), who bear ultimate responsibility for disclosure assessments and ensuring consumers receive appropriate disclosure. Advertisers may fulfill consumer-facing disclosure by applying the label themselves or by encoding C2PA metadata and relying on platforms that reliably render labels.

Framework Overview

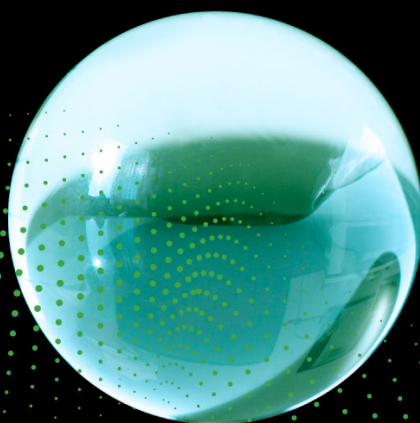
This framework provides format-specific guidance across images, video, audio, text, and synthetic influencers, with clear thresholds for when disclosure is required. It recommends either a universal visual indicator (the sparkle icon) or text labels to drive ecosystem-wide consistency for consumers. It notes regulatory requirements from the FTC, EU AI Act, and state-level legislation, positioning this materiality-based framework not as a substitute for compliance but as a consistent, consumer-first approach that doesn't disadvantage advertisers, complementing existing law where the landscape is fragmented and recommending advertisers yield to regulation wherever binding requirements are stricter.

Implementation follows a phased roadmap: assign an AI Disclosure Lead within 60 days and establish governance foundations in the first six months, pilot disclosures and begin building technical infrastructure through month twelve, and scale automated systems with ongoing monitoring within 24 months. Minimum viable practices, including pre-launch checklists, the sparkle icon as the recommended visual indicator or text labels, and C2PA metadata capture, can be implemented immediately.

Industry Impact and Urgency

By embedding disclosure into creative, operational, and technical workflows now, advertisers, agencies, publishers, and platforms can establish credible, scalable practices that sustain both trust and growth.

Contributing Industry Leaders



iab. AI Transparency and
Disclosure Framework

iab. AI Transparency and Disclosure Framework

Contributing Industry Leaders

The IAB AI Transparency & Disclosure Working Group is a cross-industry team of leaders from brands, agencies, publishers, and technology platforms who collaborated to create this framework. The group's goal is to provide the industry with practical, human-centered guidance on when, how, and to whom to disclose AI-generated content in advertising. The framework is designed to build consumer trust, balance innovation with accountability, and inform the evolving regulatory landscape—offering a workable, materiality-based approach that policymakers and other industry bodies can reference as they shape AI disclosure rules.

This working group is led by Caroline Giegerich, VP, AI at IAB, with special thanks to members:



Adam Buhler
Executive Vice President,
Creative Technology
Digitas



Caroline Giegerich
VP, AI
IAB



Graham Wilkinson
EVP, Chief Innovation Officer,
and Global Head of AI
Acxiom



Ken Fisher
Founder & Editor-in-Chief, Ars Technica
AI Council Editorial Lead
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Michael Lampert
Senior Director, Global Gen AI Adoption
and Consumer Data Strategy
Mondelēz International



Molly Crawford
Executive Vice President & Head of
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IAB

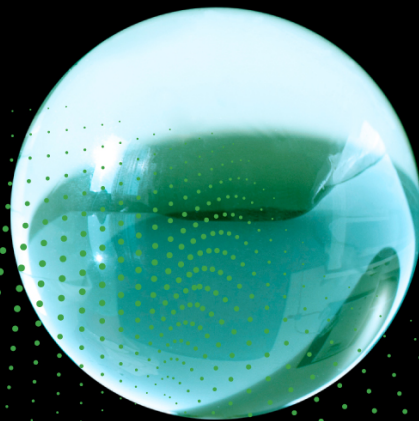


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Introduction & Current Landscape



Introduction & Current Landscape

The rapid rise of generative AI has transformed advertising, publishing, and branded content creation. In less than three years, AI-driven tools have gone from experimental pilots to widespread adoption across creative, production, and media workflows. Marketers now use AI for product imagery, synthetic voiceovers, video avatars, and large-scale copy generation. Publishers and platforms are also adopting AI to accelerate content production, localization, and personalization. This pace of adoption creates both opportunity and risk: opportunity to reduce costs and expand creative output, and risk of consumer mistrust, inconsistent practices, and fragmented regulation.

This framework aims to answer five practical questions for the industry:

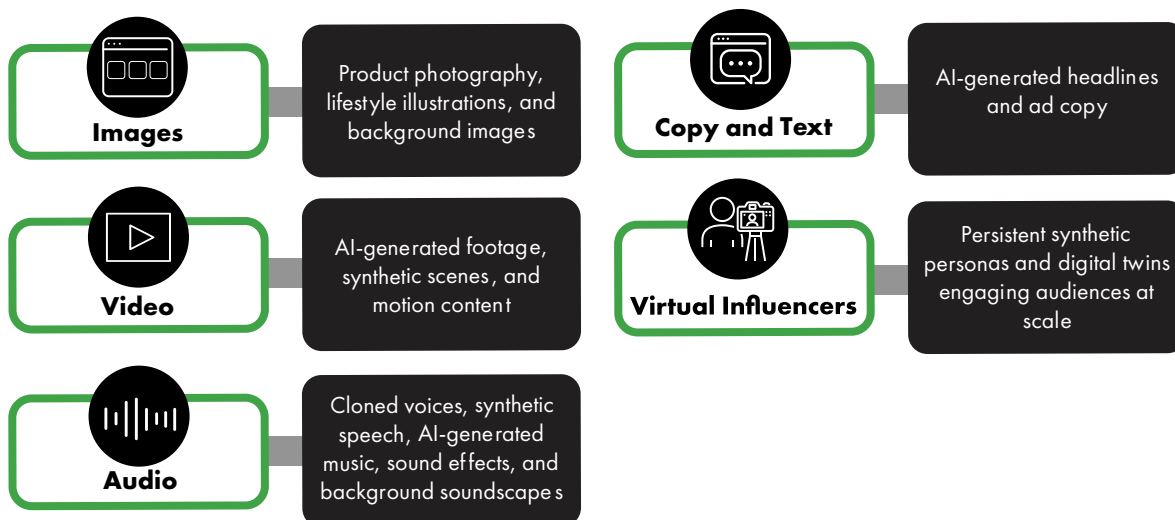
1. **Do we disclose AI use in advertising creative?**
2. **When?**
3. **How do we disclose?**
4. **To whom?**
5. **Who is responsible for disclosing?**

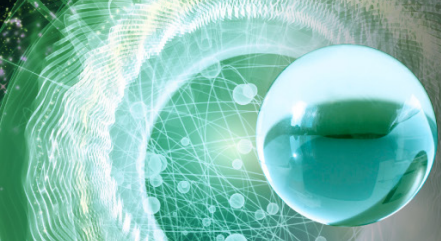
For the purposes of this framework, “advertising” follows the ICC Marketing Communications Code definition: any form of marketing communications carried by the media, typically in return for payment or other valuable consideration. Non-commercial editorial, entertainment, or user-generated content are out of scope unless they are distributed as advertising. This framework builds on insights from global self-regulatory bodies such as the International Chamber of Commerce (ICC), the European Advertising Standards Alliance (EASA), and the International Council for Ad Self-Regulation (ICAS), platform policies, and advertiser and publisher experiences to provide actionable guidance that is feasible, credible, and aligned with current regulation.

This framework provides **voluntary industry best practices** for responsible AI disclosure in advertising, helping organizations build consumer trust, apply a consistent and defensible approach to disclosure across a fragmented regulatory landscape, and demonstrate leadership in responsible AI use.

The Rise of AI-Generated Content

Generative AI now touches nearly every format in advertising:





iab. AI Transparency and Disclosure Framework

Industry adoption is exponentially on the rise because AI reduces the time and cost of production and enables personalization at a level not previously possible. However, this scale amplifies the risk that consumers may feel misled if they cannot distinguish between human and AI-generated content.

Industry Pain Points

Inconsistency. Brands, agencies, publishers, and platforms apply disclosure rules unevenly. Some campaigns label even minor AI involvement, while others label nothing unless legally mandated. This creates confusion and risks “label fatigue,” where audiences ignore disclosures entirely.

Mixed consumer expectations. Research shows consumers broadly want to know when AI is used ([Pew Research](#)), with 76% of U.S. adults saying it is extremely or very important to be able to distinguish content made by AI from content made by people; however, labels are interpreted unevenly. An [IAB study](#) of Gen Z and Millennial audiences found that younger consumers have split perceptions about advertisements with GenAI elements. Among Gen Z, 34% would regard AI-advertising brands as “creative,” while 30% would consider those brands “inauthentic.”

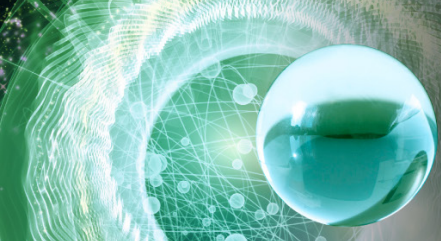
Regulatory uncertainty. A small but growing number of jurisdictions have enacted AI disclosure requirements that reach advertising. Some are advertising-specific, while others are broad AI-transparency laws that capture advertising. Existing consumer protection rules apply throughout, making advertisers liable for deceptive and unfair practices regardless of whether AI was involved. The scope and strictness of these regulatory requirements vary widely, from the European Union's comprehensive, precautionary model, to South Korea's blanket labeling approach, to the more decentralized, state-by-state approach in the United States.

Operational burden. Overly broad disclosure requirements can increase advertiser costs and cause workflow disruptions without providing meaningful transparency. Industry groups, such as EASA and ICC, caution against blanket labeling and stress disclosure should depend on deception risk and consumer impact.

Disclosure trade-offs. Disclosure is not without risk to advertisers. An [NYU Stern study](#) found that telling consumers an ad was made with generative AI cut its click-through rate by 31.5%. That cost is warranted where AI use could mislead consumers. However, labelling applied to AI involvement that poses no risk of deception penalizes advertisers without protecting consumers. This is why disclosure should be reserved for cases of material risk, not applied across the board.

Stakeholder Impact

- **Advertisers** benefit from cost and speed AI efficiencies, but face heightened reputational risk if disclosures are absent or inconsistent.
- **Publishers** must balance trust in their content with advertiser demands, often acting as enforcers of labeling rules.
- **Agencies** are under pressure to integrate AI responsibly, flag usage to clients, and share accountability when creating content on behalf of brands.
- **Platforms** (e.g., Meta, YouTube, TikTok) have taken early steps to implement AI-labeling approaches, though practices vary and continue to evolve. For example, Meta applies “AI info” labels to ads created with its generative AI tools, and TikTok was the first major platform to integrate C2PA Content Credentials for auto-detection.
- **Consumers** want clarity on AI usage but not overload.



iab. AI Transparency and Disclosure Framework

Research: The Evidence Base for Disclosure

Industry deployment of AI in advertising creative has moved from experimentation to operational norm. According to the IAB/Sonata Insights study [The AI Ad Gap Widens](#) (January 2026), 83% of advertising executives report their company has deployed AI in the creative process, up from 60% in the 2024 study. [Advertising Perceptions](#) omnibus survey from March 2026 found that 91% of advertisers are either currently using AI for creative development or plan to, with the most common applications being copywriting, static images, and video ads.

However, the gap between advertiser assumptions and consumer sentiment is widening, not closing. The IAB study found that 82% of advertisers believe consumers feel positive about AI-generated ads, while only 45% of Gen Z and Millennial consumers actually do. This 37-point perception gap has grown since 2024, driven in part by a shift in advertiser priorities toward cost efficiency over creative quality. Cost efficiency is now the top-cited benefit of AI among advertisers, up from fifth place in 2024; meanwhile, consumer sentiment has moved in the opposite direction, with negative perceptions of AI ads rising, particularly among Gen Z.

Crucially, the effect of disclosure is not uniform, as it depends on how and when AI involvement is communicated. Done well, and where it matters, disclosure can strengthen consumer trust and attention. The IAB study found clear disclosure is the third-highest driver of consumer attention to AI-generated ads, behind only high-quality visuals and humor. Among Gen Z and Millennial consumers, 73% said knowing an ad was created with AI would either increase or have no effect on their purchase likelihood; only 27% said they would be less likely to purchase.

Advertisers themselves recognize the need for guidelines. The Advertising Perceptions study found that 72% believe there should be industry standards for disclosure of AI use in creative asset development. The majority of advertisers who use AI in creative already disclose at least some of the time, primarily through captions, platform-provided labels, and on-screen markers. However, only 17% believe AI needs to be disclosed for every instance it is used, reinforcing the case for a materiality-based approach rather than blanket requirements.

Stated attitudes and revealed behavior can also diverge. Consumers say they want transparency and report little effect on their purchase intent, yet engagement can still drop when a label is actually present as noted in the click-through effect demonstrated in the NYU Stern study above. The tension is instructive rather than contradictory: Disclosure is not uniformly rewarded or penalized, which is exactly why, where, and how it applies matters.

Labels can produce an "implied-truth effect," a behavioral bias in which audiences perceive unlabeled content as more credible simply because other content carries a disclosure label. Over-labeling can lead to disclosure fatigue, where consumers learn to ignore labels entirely. These risks reinforce why disclosure should be targeted at the uses that matter most to consumers: those where AI involvement creates a material risk of misleading audiences about authenticity, identity, or representation.

Defining the Challenge

Unlike past technologies, AI outputs are probabilistic, opaque, and capable of fabricating convincing but false representations. The challenge is to develop a disclosure framework that:

- Protects **advertiser credibility** by preventing accusations of deception.
- Builds **consumer trust** by signaling when AI has materially shaped content.

This requires distinguishing between low-risk uses (AI as assistive background editing) that may not require disclosure, and high-risk uses (synthetic humans, altered claims, deepfake-style manipulations) where disclosure is essential.

Definition of Materiality

Within this framework, "materiality" refers to AI use that could mislead a reasonable consumer about what is authentic,



factual, or human-created in an advertisement. The threshold is consumer impact, not the volume of AI tools used.

This approach aligns with longstanding advertising principles: Advertisers remain responsible for truthful representation regardless of production methods, and disclosure is required when omission would deceive consumers about material aspects of the advertising content.

Core Principles of Transparency

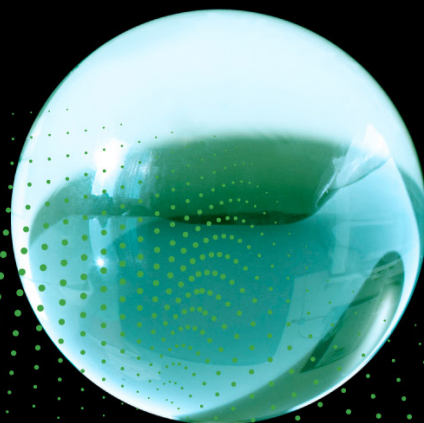
To address these challenges, a disclosure framework must be guided by four principles:

1. **Transparency:** Clear, conspicuous labels that AI is involved
2. **Proportionality:** Requirements scaled to risk and impact
3. **Consistency:** Alignment across formats and geographies
4. **Clarity:** Consumer-first best practices designed to inform audiences, not just meet legal minimalism

Takeaway

The current landscape is defined by high adoption, inconsistent disclosure, and mounting regulatory scrutiny. The industry's credibility depends on proactive practices that balance transparency with feasibility. The following sections move from landscape to action to provide clarity on where disclosure is required and how it should be implemented in practice.

Disclosure by Content Type



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Disclosure by Content Type

This section builds directly on the core principles of transparency and consumer trust outlined earlier. The following guidance is designed to balance operational feasibility with consumer clarity. The threshold for disclosure centers on a fundamental question:

Does the AI involvement create a material risk that consumers will be misled about what they're seeing, hearing, or interacting with?

The answer depends not on the sophistication of the technology, but on whether its use could reasonably alter consumer perception or decision-making.

The thresholds that follow are informed by the consumer evidence detailed above.

[Research](#) confirms that consumers distinguish between AI uses that affect their perception of authenticity as contrasted to routine production applications such as background editing or color correction. The framework's materiality-based approach reflects that distinction: Disclosure is concentrated where it matters to consumers and preserves the signal value of labels by avoiding blanket requirements that lead to [disclosure fatigue](#).

Establishing the Threshold

Before addressing specific content types, it's critical to understand what triggers disclosure requirements. The framework rests on three evaluative criteria:



Deception Potential:

Could a reasonable consumer be misled about the nature, origin, or authenticity of what they're viewing?



Material Impact:

Does AI involvement affect product representation, performance claims, or social proof in ways that influence consumer decisions or conduct, like purchase decisions?



Expectation Alignment:

Does the content fall outside the range of what consumers would reasonably expect from standard creative production?

These criteria deliberately focus on consumer impact rather than technical process. Consumers don't need to be aware of every AI tool in the production chain. They do, however, need to know when AI involvement could mislead them about what they're evaluating or being asked to buy.

These thresholds apply to lawful advertising content; fabricated testimonials, false claims, and unauthorized use of a person's likeness or voice are prohibited regardless of AI involvement, and disclosure does not cure them.



AI-Generated Images

Included: Still photography, product shots, lifestyle imagery, and illustrations used in commercial contexts.

Disclosure Required For:

Synthetic creation: Images generated from AI prompts (text-to-image or image-to-image generation), regardless of subsequent human refinement, editing, or compositing, excluding obviously non-realistic content.

Disclosure Not Required For:

General principle: Using AI to assist with standard editing tasks (retouching, color correction, compositing) does not trigger disclosure if the same edits would not require disclosure when performed through more traditional methods. The threshold is based on the nature and impact of the change regarding whether there is a material risk that the consumer would be misled, not whether AI tools were involved in the editing process.

- **Routine post-production** editing analogous to established editorial practices (e.g., color correction, lighting adjustments, background cleanup, dust/blemish removal, contrast optimization), unless the edit creates a material risk of misleading consumers about the product or its performance.
- **Clearly stylized or fantastical imagery** where no reasonable consumer would perceive photographic realism (illustrated characters, clear CGI effects, artistic interpretations).
- **AI-assisted technical improvements** that don't alter content meaning: upscaling resolution, de-noising, format conversion, background alteration that doesn't affect product representation.

Example Applications:

- An e-commerce retailer uses AI to generate images from prompts of their furniture products in various room settings without photographing either the product or the rooms: **disclosure required** (AI-generated from a prompt).
- A CPG retailer uses AI to remove a distracting shadow from a product photo taken in their studio: **no disclosure required**.
- A supplement company uses AI tools to generate lifestyle backgrounds for product photos, placing bottles in kitchens, gyms, and outdoor settings: **no disclosure required** (real product photo with AI-generated backgrounds - covered under background alteration).

AI-Generated Video Content

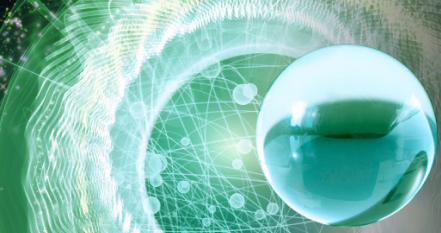
Included: Synthetic footage, digitally generated scenes, and motion content

Disclosure Required For:

- **Synthetic video:** Video generated from AI prompts (text-to-video, image-to-video, or video-to-video generation), regardless of subsequent human refinement, editing, or compositing, excluding obviously stylized or fantastical content.

Disclosure Not Required For:

General principle: If a video editing task could be performed with traditional tools (Adobe Premiere, After Effects, visual effects software) without requiring disclosure, using AI to perform the same task does not trigger disclosure, unless there is a material risk that the consumer would be misled.



iab. AI Transparency and Disclosure Framework

- **Stylized or obviously fictional content:** Clearly animated characters, fantasy sequences, or content with evident non-realistic elements (cartoon avatars, mascots with exaggerated features).
- **Standard post-production:** Color grading, frame rate adjustments, background replacement that doesn't alter core content meaning, stabilization, routine visual effects.

Example Applications:

- A financial services brand creates a video ad entirely from a text prompt: **disclosure required** (video generated from a text prompt).
- An automotive ad uses AI to seamlessly remove safety rigging from a stunt sequence: **no disclosure required** (standard visual effects practice).
- A hotel brand uses AI to enhance sunset colors and remove tourists from footage of their property: **no disclosure required** (standard post-production editing).

AI-Generated Audio

Included: Synthetic speech, voice cloning, AI-generated music, sound design, and audio effects used in commercial contexts.

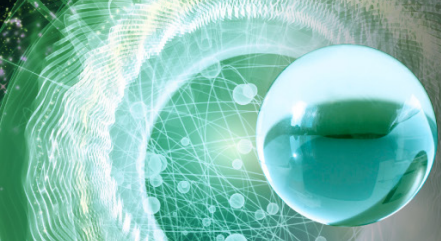
Disclosure Required For:

- **Synthetic voice of deceased persons:** AI-generated voice content that creates new speech or statements from deceased individuals (words they never actually spoke while alive), even with estate authorization. This excludes the use of archived, actual recordings where the person genuinely spoke those words during their lifetime.
- **Synthetic voice of living persons making statements they never made:** AI-generated voice content of living individuals (with authorization) depicting events, actions, or circumstances that did not occur, in a manner a consumer could mistake for authentic documentation, as distinct from scripted commercial endorsements or brand messaging that are clearly promotional in nature and explicitly authorized by the individual.

Disclosure Not Required For:

General principle: If audio production or editing could be performed with traditional tools (Pro Tools, Logic Pro, audio mixing software) without requiring disclosure, using AI to perform the same task does not trigger disclosure. The threshold is whether the AI creates a false impression about who is speaking or what was said, not merely how the audio was produced.

- **Authorized synthetic voice of living person for scripted commercial content:** When a living individual has explicitly authorized the use of AI to replicate their voice for standard advertising purposes (product endorsements, brand messaging, scripted narration).
- **Generic synthetic voices:** AI-generated voiceovers that don't impersonate specific individuals and are used for standard narration, where the identity of the speaker is immaterial to the message.
- **Background music and soundscapes:** AI-generated music, ambient sound, or sound effects where no reasonable consumer would interpret the content as being created by or associated with a specific artist or composer.
- **Standard audio enhancement:** Noise reduction, equalization, mixing, volume normalization, or other technical improvements that don't alter the substance of what was recorded.



iab. AI Transparency and Disclosure Framework

- **Minor voice corrections:** Breath removal, timing adjustments, pitch correction, or de-clicking that fall within standard audio engineering practices.

Example Applications:

- A watch brand creates an ad using an AI-generated voice that sounds like a deceased celebrity endorsing their product (with estate approval): **disclosure required** (voice clone of deceased identifiable person).
- A meditation app generates calming background music using AI composition tools: **no disclosure required** (background music where production method is immaterial).
- A podcast ad uses AI to clean up background noise and normalize volume levels: **no disclosure required** (standard audio post-production).
- A software company uses a generic AI voiceover to explain their product's technical features in a demo video: **no disclosure required** (standard narration where speaker identity is immaterial).
- An automotive company uses an authorized AI voice clone of a racing champion narrating a dramatized recreation of a race he did win, in the first person, as though recorded at the track that day: **disclosure required** (synthetic voice presenting a recreated scenario a consumer could mistake for an authentic recording).

Synthetic Influencers and Virtual Personalities

Included: Digital twins (AI replica of real individuals), synthetic influencers (entirely fictional AI-generated personas (e.g., Lil Miquela))

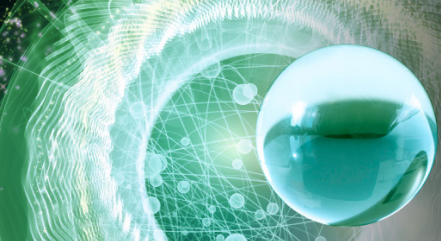
Disclosure Required For:

- **Digital twins of real individuals (deceased):** AI replicas of real people who are deceased, used in advertising in any capacity, even with estate authorization.
- **Digital twins depicting fabricated events or scenarios:** AI replicas of living individuals (even with authorization) shown participating in specific events, locations, interactions, or circumstances that never occurred, where consumers might believe they are viewing authentic documentation.
- **AI chatbots or conversational agents in ads:** When AI-powered personas engage directly with consumers in ways that simulate human interaction.

Disclosure Not Required For:

General principle: If a character's synthetic nature is immediately apparent through visual style, context, or presentation, additional disclosure may be redundant. The threshold is whether a reasonable consumer might believe they're interacting with or viewing a real human being.

- **Digital twins in authorized standard advertising contexts:** AI replicas of living individuals with authorization, used in typical commercial advertising formats (product endorsements, brand representation, scripted messages) where no specific real-world event or scenario is being fabricated.
- **Obviously non-human or stylized characters:** Cartoon mascots, animated brand characters, fantasy creatures, or virtual personas with clearly non-realistic visual styles (anime-style, cartoon-like, fantastical features) where no reasonable consumer would perceive them as real people.
- **Incidental background figures:** AI-generated personas, such as synthetic influencers or generic AI-generated individuals in non-focal roles such as crowds, background scenes, or ambient elements where consumer attention



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is directed elsewhere and individual authenticity is not material to the ad's message.

Example Applications:

- A fashion brand creates "Mia," a photorealistic AI influencer, and runs her content as paid social and display creative: **disclosure required** (synthetic persona that could be mistaken for a real person).
- A beverage company showcases a digital twin of a celebrity as a spokesperson with celebrity authorization: **no disclosure required** (authorized digital twin of a real individual with brand endorsement).
- An insurance company uses an animated gecko mascot in their commercials: **no disclosure required** (obviously non-human character).
- A game developer features stylized anime-style virtual characters in promotional materials: **no disclosure required** (clearly fictional, non-realistic visual style).

Text and Copy

Included: Headlines, ad copy, product descriptions, email content, and any written material used in commercial contexts

Disclosure Required For:

For text and copy, disclosure is generally not required. Advertisers remain responsible for the accuracy and substantiation of all claims regardless of authorship method. AI-generated false claims, unverified data, or expert advice without proper human review are prohibited under existing advertising and consumer protection laws, and disclosure does not cure these violations.

Disclosure Not Required For:

- **Standard marketing copy:** Headlines, slogans, product descriptions, email subject lines, social media posts, and other promotional text where AI serves as a drafting tool.
- **General creative writing:** Blog posts, brand storytelling, and editorial content where AI assists but human editors validate accuracy and tone.
- **Translations and localizations:** AI-powered translation or adaptation of approved content into multiple languages.

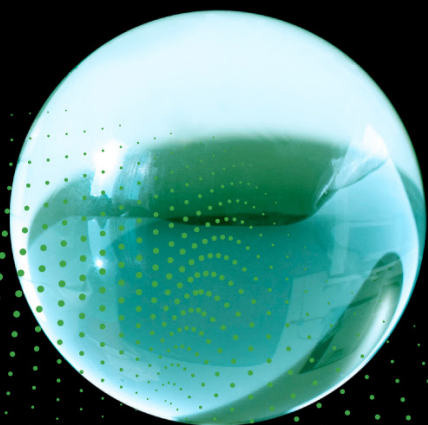
Example Applications:

- A clothing brand uses AI to draft hundreds of product descriptions that are reviewed and approved by merchandising staff: **no disclosure required**.
- A travel company uses AI to translate its English website content into 15 languages: **no disclosure required**.

Section Takeaway:

Disclosure requirements vary by content type, but the underlying logic remains consistent: Transparency is required when AI involvement creates a material risk of consumer deception which falls outside current consumer protection laws. This framework intentionally avoids mandating disclosure for every AI tool in the production pipeline, focusing instead on consumer-facing impact. The following section addresses how to implement these disclosures effectively.

Operational Framework

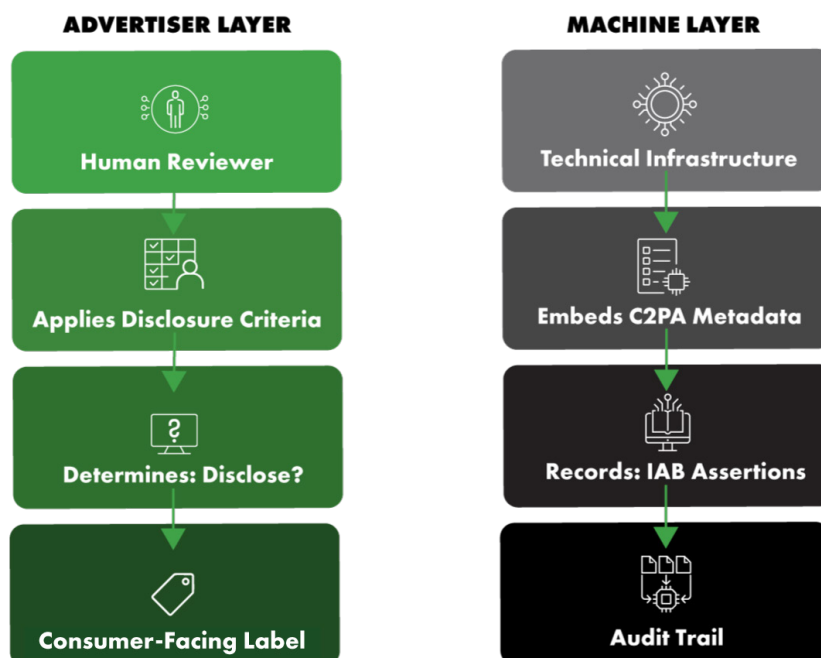


Operational Framework

The preceding section established what advertising content requires disclosure based on materiality thresholds. This section addresses how to operationalize those decisions: disclosure mechanics, audiences, timing, and accountability.

The Two-Layer Model

Effective AI disclosure operates across two interconnected layers:

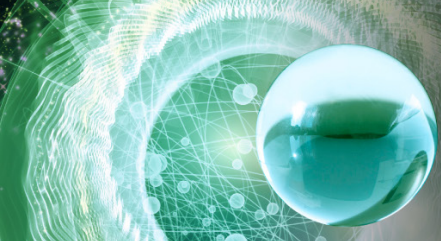


Machine Layer (Provenance Infrastructure): Using the Coalition for Content Provenance and Authenticity (C2PA) standard, an open technical standard that records how digital content was created, edited, and published by embedding metadata cryptographically into the file itself. This layer provides an auditable record of content creation and modification, capturing what AI tools were used, when changes occurred, and the advertiser's threshold determination. While C2PA adoption is still maturing and cannot guarantee completeness or prevent all forms of tampering, it enables platforms, regulators, and auditors a method to verify declared disclosure decisions, providing transparency infrastructure that will strengthen as ecosystem adoption scales.

Because metadata can be stripped when files are re-saved, compressed, or screenshotted, embedded watermarking, such as Google's SynthID as now adopted across several major AI providers, is increasingly paired with C2PA as a complementary layer that preserves an AI-origin signal even when metadata is lost. This framework is built on C2PA and treats watermarking as a reinforcing complement.

Advertiser Layer (Disclosure and Accountability): Human reviewers apply IAB disclosure thresholds to determine whether AI involvement poses a risk of consumer deception. When materiality triggers disclosure requirements, advertisers implement consumer-facing labels or explanations.

The two-layer model enables both verification (through metadata) and transparency (through consumer-facing labels).



iab. AI Transparency and Disclosure Framework

1. How to Disclose (Signal)

Consumer-Facing Disclosure: Visual Icon or Text Label

For advertising content that meets the disclosure thresholds established in this framework, two consumer-facing disclosure methods are acceptable: a standardized sparkle icon or a clear text label. Either fully satisfies the disclosure requirement, letting advertisers choose the method best suited to the format and placement.

Each method has distinct strengths. Text labels remain the clearest form of disclosure for consumer comprehension, and [research](#) confirms that terms like "AI-generated" and "Generated with an AI tool" are the most consistently understood across audiences and geographies. A sparkle icon, by contrast, is conspicuous, offering less competition with the creative message, lowering the adoption friction that explicit on-creative text can introduce, especially in smaller formats. Offering both lets advertisers disclose in the way that fits a given format.

For the icon, the framework adopts the Unicode sparkle (✨), an existing universally available character. Sparkle iconography has become widely associated with AI across the technology industry, in product interfaces, creative tools, and platform features, so consumers are increasingly primed to read a sparkle as an AI-related signal. Using the Unicode character means the indicator is freely available to every advertiser, agency, platform, and publisher, requires no licensing, and scales across formats. The sparkle is informational rather than cautionary in tone, consistent with this framework's materiality-based approach: it signals that AI was meaningfully involved, not that something is wrong.

Rendering and Functional Requirements

The framework uses the Unicode sparkle [U+2728], rendered as a monochrome glyph. Where the sparkle icon is used, it should be immediately recognizable as an AI disclosure indicator, remain legible from full-page display down to mobile social placements, and meet the accessibility and placement requirements specified below.

The EU has established its own labeling approach under the AI Act. The transparency obligations in Article 50 became binding on August 2, 2026, requiring deepfakes and certain AI-generated content to be disclosed, but Article 50 itself does not prescribe a specific icon. The accompanying [Code of Practice](#), finalized in June 2026, provides official EU icons and design and placement rules, though deployers may use an equivalent icon or label that meets those specifications.

Platform-applied indicators. Where a platform automatically applies its own AI disclosure label based on C2PA metadata or advertiser declarations, the platform-applied label may satisfy this framework's disclosure requirement provided it meets the visibility, accessibility, and placement requirements specified below. Advertisers should note that platform rendering of advertiser-encoded C2PA into consumer-facing labels is currently operational primarily for content generated on-platform, not for third-party ad creative brought in with C2PA metadata. Until platform rendering of third-party ad C2PA is widespread, advertisers should apply visible disclosure within the creative itself for distribution channels where platform rendering cannot be relied upon. The advertiser remains accountable in all cases for ensuring the consumer receives appropriate disclosure.

Platform Labeling

Major platforms like Meta, YouTube, and TikTok have each developed their own AI disclosure labels for advertising and organic content, and approaches vary significantly. These policies are summarized in the *Regulatory and Standards Alignment* section of this document.

Where platforms continue to apply their own established labels, those labels remain valid disclosure provided they meet the visibility, accessibility, and placement requirements specified in this framework, but ecosystem convergence on a single indicator is the preferred long-term direction.

Three valid paths exist for fulfilling consumer-facing disclosure. First, the advertiser may apply the visible indicator



within the creative itself before distribution. This path applies in any distribution environment, including the open programmatic ecosystem, CTV, out-of-home, and platforms without C2PA-reading infrastructure. Second, where a platform reliably reads C2PA metadata and applies a label meeting this framework's conspicuousness requirements, the advertiser may rely on platform rendering to fulfill the consumer-facing disclosure requirement. Advertisers choosing to rely on platform rendering should verify, per platform, that the platform reliably reads C2PA metadata and renders a label before relying on this path. Third, when an advertiser creates ad creative using a platform's own AI tools, the platform can apply its disclosure label proactively, without relying on advertiser-supplied C2PA metadata as it generated the content and already knows AI was involved.

Required Disclosure by Content Type			
Content Type	Threshold Trigger	Disclosure Method	Placement/Duration
 Synthetic Image	Images generated from AI prompts (text-to-image or image-to-image), excluding obviously non-realistic content	Recommended standardized visual indicator OR Alternative text label: "AI-generated"	Placement near image when feasible
 Synthetic Video	Video generated from AI prompts (text-to-video or image-to-video), excluding obviously stylized or fantastical content		Must appear on first frame/ introduction and remain visible throughout video
 Synthetic Voice of Deceased Person	AI-generated voice of deceased person, even with estate authorization	Verbal disclosure: "AI-generated voice"	Audio: verbal disclosure pre- or post-content. Video: text overlay
 Synthetic Voice (Living) - Fabricated Statements	AI-generated voice of living person (even with authorization) depicting events, actions, or circumstances that never occurred, as distinct from scripted commercial endorsements or brand messaging		Audio: verbal disclosure pre- or post-content. Video: text overlay

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Content Type	Threshold Trigger	Disclosure Method	Placement/Duration
 Synthetic Avatars	Fully AI-generated avatar which could be mistaken for a real human	Recommended standardized visual indicator OR Alternative text label: "AI-generated"	Must appear on first frame/ introduction and remain visible throughout synthetic avatar use
 Digital Twin (Deceased)	AI re-creation of real person's likeness (deceased) with estate authorization		Must appear on first frame/ introduction and remain visible throughout use
 Digital Twin (Living) - Fabricated Events	AI replica of living person (even with authorization) depicted in specific events, scenarios, or locations that never occurred, as distinct from standard product endorsements or brand representation		Must appear on first frame/ introduction and remain visible throughout use
 Conversational Agents in Ads	Interactive AI-powered personas embedded in advertising that engage directly with consumers in ways that simulate human interaction	Text disclosure: "AI-powered"	Readily accessible throughout ad experience

Implementation Requirements

Visual (Display, Video, Social):

Text Labels (Primary Method)

For visual indicators (watermarks, icons):

- **Size:** Sufficiently large to be clearly readable
- **Contrast:** Sufficient contrast with background to ensure visibility across contexts

All visual disclosure methods must:

- **Persistence:** Remain visible throughout content exposure or appear on first frame/screen
- **Placement:** Positioned to avoid obstruction by platform UI elements

For text labels:

- **Language:** In the language of the primary audience



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- **Text size:** Sufficiently large to be clearly readable
- **Contrast:** Minimum Web Content Accessibility Guidelines (WCAG) AA contrast ratio (4.5:1 for standard text)

Audio (Radio, Podcast, Streaming):

- **Clarity:** Spoken at normal pace in clear, intelligible voice
- **Language:** In the same language as the advertisement
- **Positioning:** Before or immediately after the AI-generated segment
- **Repetition:** Repeated at least once if the ad exceeds 60 seconds

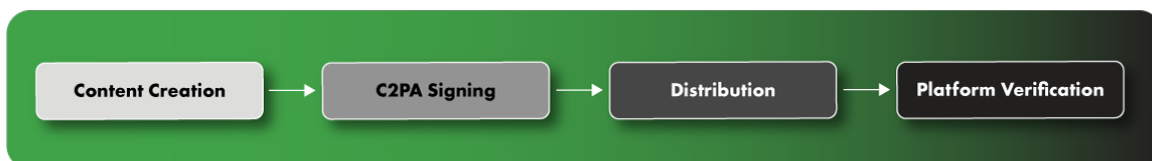
Accessibility Requirements:

- All visual labels and indicators must include alt text for screen readers
- Audio disclosures should have visual equivalents when video is present
- Captions must include disclosure text

The Guiding Principle: The disclosure must be perceptible and accurate, clear enough to inform, but unobtrusive enough to avoid 'label fatigue.'

Provenance Metadata (C2PA)

What it is: Coalition for Content Provenance and Authenticity (C2PA) is an emerging industry-standard technical format that embeds invisible metadata into ad assets, like digital nutrition labels that travel with the content. This metadata creates a verifiable record of how the asset was created and whether AI was involved.



Why it matters: While consumer-facing labels tell audiences "this used AI," C2PA metadata enables platforms to verify those claims, supports audit trails for regulatory compliance, and can trigger automated disclosure systems at scale.

IAB Implementation:

The advertiser's disclosure determination should be recorded in C2PA metadata before distribution. IAB is defining two custom assertions for this purpose:

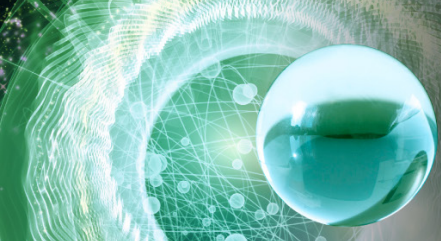
1. `com.iab.threshold` — Whether AI involvement met the threshold to require disclosure (met/not met)
2. `com.iab.disclosure` — Whether a consumer-facing disclosure was applied (yes/no)

Metadata should also capture AI involvement type (e.g., "synthetic voiceover," "background replaced") and tool identification. While certain fields including timestamps, tool versions, signer entity, and some AI involvement type may be captured automatically, the disclosure classification remains a human-determined judgment.

2. To Whom to Disclose (Audience)

AI transparency in advertising serves multiple audiences: consumers, business partners, and regulators.

Consumer-facing disclosures are required only when AI materially shapes content in a way that could mislead a



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reasonable viewer about authenticity, identity, or representation. These cues appear directly within the ad experience and follow IAB format-specific disclosure guidance.

B2B disclosures are embedded in metadata and accompany every AI-involved asset, whether consumer AI labeling is required or not. This ensures agencies, publishers, platforms, and auditors can verify usage and alignment with policy without relying on visible labels.

Regulators and oversight bodies may request access to provenance data for compliance or investigation purposes. The C2PA encoding process provides an audit trail that remains tamper-evident and machine-readable.

3. When to Disclose (Timing/Lifecycle)

Pre-Campaign (Planning & Creation)

Before distribution, human reviewers evaluate AI involvement against IAB materiality thresholds, be that the brand or agency. The decision should be recorded in C2PA metadata, creating an auditable record that travels with content throughout its lifecycle.

During Campaign (Distribution)

Consumer-facing disclosures must appear whenever and wherever content is displayed, traveling across platforms, formats, and distribution channels. A synthetic influencer post requires disclosure on Instagram, TikTok, YouTube, and any platform where it appears, not relegated to one-time notices. Disclosure must be present at the point of consumer exposure.

Ongoing Relationship Disclosure

Content representing ongoing relationships, such as AI avatars serving as brand spokespersons or synthetic influencers maintaining social presences, requires disclosure in every appearance. Each consumer encounter with the AI entity requires its own disclosure.

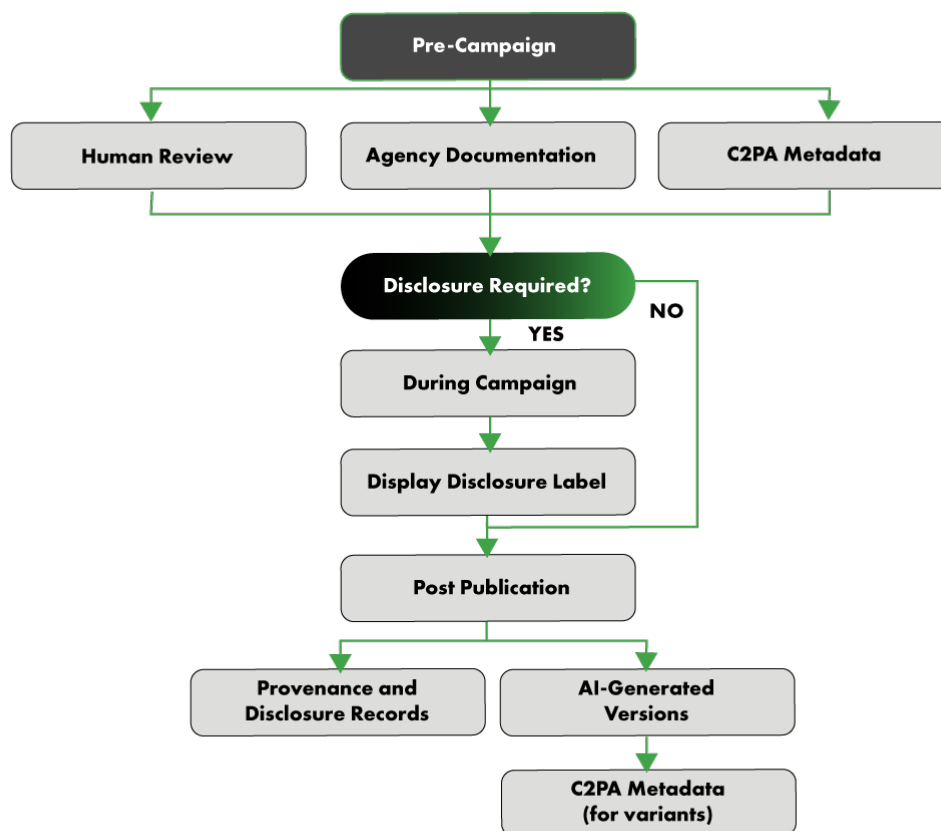
Post-Publication (Archiving & Audit)

Localization: AI translation or minor localization of human-created content typically falls below disclosure thresholds.

Dynamic Content:

- **Dynamic Creative Optimization:** Components exist before the campaign. Each component is evaluated against the framework's thresholds. If any component triggers disclosure, the assembled creative carries the disclosure.
- **AI Personalization:** Components are generated at serve time and do not exist as evaluable assets before launch, so disclosure cannot be assessed by reviewing each output in advance. Instead, the advertiser defines the disclosure rules at the system level, specifying which components or generation paths produce content that meets the framework's thresholds. The generative system then applies these rules at serve time, attaching the required disclosure to outputs that include a triggering component and omitting it from those that do not. Because the system controls how each output is assembled, it can determine which outputs require disclosure without pre-launch review of every variant, keeping disclosure targeted to the outputs that actually warrant it rather than labeling all outputs from a capable system.

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4. Who Is Responsible for Disclosure (Accountability)

Advertiser Accountability (Primary)

Ultimate responsibility rests with the advertiser, defined as the organization that creates the advertising content. This entity bears responsibility for determining disclosure thresholds, implementing consumer-facing disclosures, and ensuring accurate provenance metadata. This accountability cannot be delegated.

In cases where agencies create and control advertising content on behalf of clients, both the agency and the client may share advertiser responsibility.

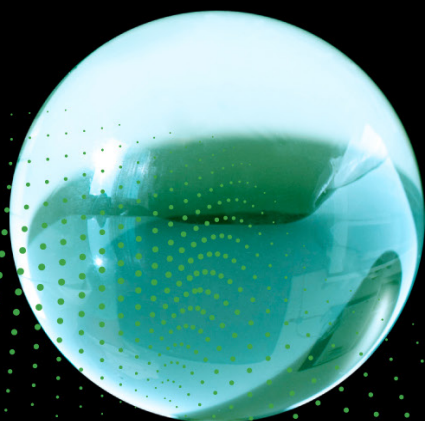
Platform Enforcement (Secondary)

Where an advertiser relies on platform rendering to fulfill consumer-facing disclosure, the advertiser remains accountable for the outcome. If a platform fails to render a label, or renders one that does not meet this framework's visibility, accessibility, and placement requirements, the disclosure obligation has not been met. Advertisers should verify rendering behavior per platform and apply the disclosure within the creative wherever rendering cannot be relied upon.

As C2PA adoption matures, platforms can use custom IAB assertions (`com.iab.threshold`, `com.iab.disclosure`) to verify disclosure consistency and may flag or reject ads where metadata indicates disclosure is required but no consumer-facing label is present.

Platforms serve as secondary enforcers within their ecosystems, but do not assume advertiser liability for disclosure accuracy.

Regulatory & Standards Alignment



Regulatory & Standards Alignment

Global transparency rules for AI in advertising are converging on a common principle—truthful representation—but diverging in enforcement methods, ranging from blanket mandatory labeling to materiality-based deception standards to voluntary frameworks. The regulatory landscape is evolving rapidly. This section reflects the state of policy as of August 3, 2026 and summarizes regulatory requirements and trends across key jurisdictions, outlining how this framework provides the practical bridge between law, technology, and market adoption.

AI advertising disclosure exists in a fragmented global environment. Explicit transparency obligations are intensifying as AI use in advertising scales, but the approach, mandatory labeling versus deception-based enforcement, continues to diverge across markets. Regardless of jurisdiction, advertisers remain liable for misleading content.

United States: Federal Regulation

Existing federal truth-in-advertising law already requires disclosure when AI involvement would mislead a reasonable consumer, applying the same materiality principle that underlies this framework. The framework does not create a new legal obligation; it operationalizes one that existing law leaves without practical implementation guidance.

At the federal level, the U.S. model remains principle-based, focused on deception rather than mandatory labeling. A December 2025 Executive Order directed the federal government to establish a uniform national AI policy framework and challenge state AI laws deemed inconsistent with federal priorities. Congressional efforts to codify federal preemption of state AI laws have so far failed. The DOJ's AI Litigation Task Force began challenging state AI laws in court in April 2026, but no preemption statute has been enacted. State disclosure laws remain enforceable until courts rule otherwise, and advertisers should continue to comply with applicable state requirements while monitoring developments.

United States: State-Led Regulation

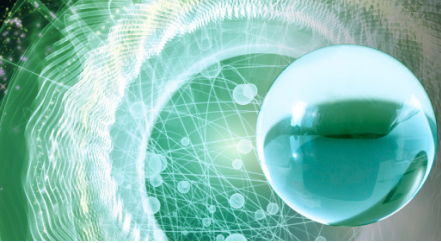
In the absence of a federal mandatory labeling standard, states have moved to fill the gap. Over 1,000 AI-related bills were introduced across states in 2025 alone, with disclosure requirements emerging as a consistent theme. The two laws with the most direct and imminent implications for advertising are:

New York: S 8420-A/A.8887-B / Synthetic Performer Disclosure Law (Effective: June 9, 2026)

New York requires conspicuous disclosure when AI-generated synthetic performers appear in advertisements. A "synthetic performer" is defined as a digitally created asset created, reproduced, or modified by computer using generative AI or a software algorithm, intended to create the impression of a human performer not recognizable as any identifiable natural performer. The law does not apply to audio-only advertisements, AI used solely for language translation, or advertisements for expressive works (i.e., movies, television programs, streaming content, video games, and similar audiovisual works) where the synthetic performer's use is consistent with its role in the underlying work. Accountability rests with the advertiser and sets civil penalties at \$1,000 for a first violation and \$5,000 for each subsequent violation.

This framework's disclosure threshold for synthetic influencers and photorealistic synthetic humans aligns with New





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York's requirement. Advertisers following this framework's guidance for fully AI-generated personas in primary roles will meet the law's disclosure trigger, though note that the statute separately requires that the disclosure itself be conspicuous.

California: SB 942/AB 853 / California AI Transparency Act

(Effective: August 2, 2026)

The California AI Transparency Act applies to "covered providers," the developers and operators of generative AI systems with over one million monthly users publicly accessible in California, such as Adobe Firefly, DALL-E, and Google's AI tools. It does not apply directly to advertisers or brands.

Covered providers are required to do three things:

1. Embed an invisible latent disclosure (provenance metadata) in image, video, and audio content created by their system, which is mandatory and automatic.
2. Offer users an optional visible label for content created or altered by their system, which is available but not required.
3. Provide a free public detection tool so anyone can verify whether content was created or altered by their system. The detection tool and optional visible label are triggered by content "created or altered" by a covered GenAI system, while the mandatory latent disclosure applies to content the system creates. "Altered" is undefined in the statute, creating significant ambiguity for partially AI-modified content. A brand which uses a covered tool to adjust lighting, change a background, or enhance audio has technically "altered" content under the law, but whether that triggers any obligation is unresolved.

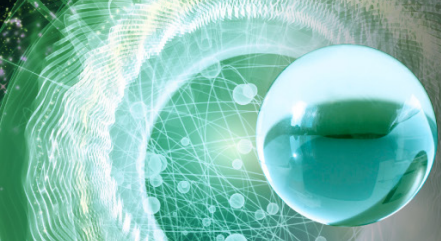
For advertisers, the practical gap is this: The latent metadata gets embedded automatically by the platform, but the consumer-facing visible label is optional. The California AI Transparency Act imposes no direct penalty on brands for omitting it. This framework closes that gap by establishing the advertiser's independent obligation to make a materiality-based disclosure decision regardless of what platform tooling does or does not apply.

Additional state laws with advertising disclosure implications are expected to reach enforcement through 2026 and beyond.

European Union

The EU AI Act, adopted in 2024, includes transparency obligations for AI-generated content. Article 50, the provision most relevant to advertising, applies to advertisers as deployers of AI systems and took effect August 2, 2026. It requires disclosure of deepfakes (image, audio, or video content that resembles existing persons, objects, places, entities, or events and would falsely appear authentic) and AI-generated text published to inform the public on matters of public interest, with an exemption for content that has undergone human editorial review.

The European Commission has finalized a Code of Practice on Transparency of AI-Generated Content to help companies meet Article 50's disclosure requirements in practice, and the Commission and AI Board have confirmed it as an adequate voluntary tool for demonstrating compliance. Roughly 190 companies and organizations had signed by the end of July 2026. The Code establishes a two-layer approach, embedded metadata combined with a visible label, and drops the earlier attempt to distinguish between AI-generated and AI-assisted content. In practice, that line is nearly impossible to draw as modern production workflows routinely blend human and AI input, making a clean categorical distinction unworkable. On July 20, 2026, the Commission also adopted final Guidelines on Article 50, which serve as its definitive interpretation of the transparency obligations. Separately, the AI Omnibus package adopted in June 2026 gives AI systems already on the market before August 2, 2026 until December 2, 2026 to comply with the marking and detection obligations. Systems placed on the market after that date must comply immediately.



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The Code of Practice is a voluntary compliance pathway, not a legal mandate in itself, but the underlying Article 50 obligations it supports are enforceable, carrying fines of up to €15 million or 3% of annual worldwide turnover for non-compliance. Companies that sign the Code can rely on its measures to demonstrate compliance with Article 50. Those that don't must demonstrate compliance through alternative means, with the Code and the Commission's Guidelines serving as the regulatory benchmark either way.

This framework and Article 50(4) of the EU AI Act largely align in direction: Both require disclosure of AI-generated content that could mislead consumers about authenticity.

This IAB framework diverges in two specific commercial-endorsement cases:

1. Authorized voice clones of a living person
2. Authorized digital twins of a living person not in fabricated events

In both cases, this framework treats traditional commercial endorsement framing as removing materiality risk: a consumer watching a celebrity endorsement understands they are seeing paid commercial messaging, so the use of an AI-generated voice or likeness with the talent's authorization does not create deception about authenticity. Article 50(4) does not carve out commercial endorsement context; AI-generated audio or video that resembles an existing person and appears authentic falls within its disclosure scope regardless of consumer expectation.

For advertisers operating in EU markets, EU requirements take precedence where they exceed this framework's thresholds.

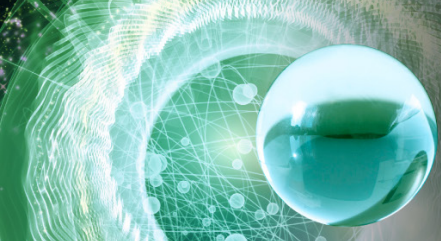
APAC Region

China's Labeling Measures for AI-Generated Synthetic Content took effect September 1, 2025, requiring explicit visible labels and embedded metadata across AI-generated text, images, audio, video, and virtual scenes, applicable across advertising and media.

South Korea's AI Basic Act took effect January 22, 2026, with a one-year enforcement grace period, and requires labeling of AI-generated content where outputs may be mistaken as real. Separately, a bill amending South Korea's Network Act, introduced in the National Assembly in June 2026 and still pending, would require labeling of AI-generated photos and videos posted online, regardless of materiality or consumer deception risk, with platform operators responsible for managing compliance. AI-generated audio is not specifically covered by the pending amendment but remains subject to the AI Basic Act's realism-based disclosure trigger. The enforcement decree and MSIT guidelines, released in early 2026, clarify labeling requirements: shareable content must be labeled on the content itself, and deepfakes must always carry a visible label. Under the pending amendment, platform operators would be responsible for advertiser compliance, and punitive damages of up to 5x actual losses would apply for malicious distribution of false content, a provision targeted at bad actors deliberately spreading deceptive AI content rather than inadvertent non-disclosure.

India has moved from voluntary principles toward a risk-based labeling regime. The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Amendment Rules, amended in February 2026, mandate labeling of content containing "synthetically generated information." Building on this, the [Advertising Standards Council of India \(ASCI\)](#) released draft guidelines (final guidelines pending) applying a three-tier, risk-based structure: high-risk advertisements (e.g., fabricated testimonials or fake authority figures) are prohibited even with a label; medium-risk uses that could materially influence consumer decisions (e.g., AI-generated influencers, realistic AI-generated events, or AI-depicted product performance) require disclosure; and low-risk uses (routine color correction, decorative backgrounds, obvious fantastical elements) require none.

Taiwan has an active, advertising-specific labeling requirement framed around fraud prevention. Under [Article 31 of the Fraud Crime Hazard Prevention Act](#) (enacted July 2024), with implementing regulations issued by the Ministry of Digital Affairs in November 2024, online advertisement platform operators must disclose, on the advertisement itself,



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whether an ad uses deepfake technologies or AI-generated personal imagery. The obligation sits with the platform operator rather than the advertiser, and the scope is narrower than blanket AI labeling as it targets deceptive or impersonating AI content in advertising to help consumers assess credibility and aid tracing of fraudulent ads.

Thailand's Office of the Consumer Protection Board (OCPB) notification (in force July 2025) requires a clearly visible or audible label, in OCPB-approved wording, on any advertising image or video created or significantly edited with AI where it could mislead consumers about the product. Vietnam's Law on Artificial Intelligence (in force March 2026) requires AI-generated audio, image, and video to be marked in machine-readable form, with clear public notice and distinct labelling where content could be mistaken for authentic real persons or events. Under the implementing decree effective May 2026, visible labels are required where content simulates a real person's appearance or voice or recreates real events, while purely technical edits that improve quality without altering the nature or context of the content are exempt. The law includes transition periods for many existing AI systems, but the content labeling obligation applied immediately when the decree took effect.

South Korea, Vietnam and India do not recognize this framework's authorized commercial endorsement exemption. In these markets, disclosure applies to authorized digital twins and voice clones regardless of consumer expectation about commercial messaging, though which party bears the labeling obligation varies by jurisdiction.

Japan, Singapore, and Australia favor principle-based, voluntary approaches.

Platform Policy Evolution

Major platforms have established and continue to evolve their own AI disclosure policies. These policies supplement but do not substitute for advertiser obligations under this framework.

Meta applies 'AI Info' labels to ads created or significantly edited using its own in-house generative AI tools. Where the ad includes an AI-generated photorealistic human, the label appears next to the 'Sponsored' designation; for other significant edits, it appears behind the three-dot menu. Minor changes and edits made with third-party tools do not trigger auto-labeling, and advertiser-declared disclosure remains the compliance mechanism for content created outside Meta's own tools. For ads about social issues, elections, or politics, Meta applies a separate 'AI Info' disclosure requirement covering photorealistic or realistic audio content depicting events or people in ways designed to mislead — including a real person saying or doing something they didn't, a realistic non-existent person, or an altered or fabricated event. Immaterial edits such as resizing or color correction are not in scope. This requirement applies regardless of whether the content was made with Meta's tools or third-party tools.

TikTok requires disclosure for any ad content that is completely AI-generated or significantly modified by AI, defined as changes beyond minor tweaks such as lighting, color, or background adjustments. Ads must apply the AIGC label or include a clear disclaimer, caption, watermark, or sticker. If TikTok identifies AI-generated content in an ad that has not been disclosed, the ad will be rejected or restricted. Content created using Symphony Creative Studio is automatically labeled. Consent is required for the use of any real person's likeness in AI-generated ad content.

Google uses SynthID, a digital watermarking technology that embeds imperceptible signals into AI-generated content. Google also uses C2PA Content Credentials across a growing number of generative media tools. In 2023, Google introduced a requirement to disclose synthetic or digitally altered content in election ads. Existing ad policies already serve as important safeguards, along with work to verify advertisers and share who's behind an ad. Google continues to prohibit misleading and deceptive ads, whether created with AI or not, to keep the platform safe for everyone. In 2026, Google introduced new disclosure management capabilities for advertisers introducing additional features, including a 'How this ad was made' panel to help people easily understand when generative AI was used to create or alter an ad.

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Meta

Applies 'AI Info' labels to ads created or significantly edited using its own in-house generative AI tools.



TikTok

Requires disclosure for any ad content that is completely AI-generated or significantly modified by AI.



Google

Uses provenance technology, advertiser verification, and ad policies with targeted AI disclosure.

Industry Body Alignment

The [ICC Marketing Code \(2024\)](#) and [ICAS' "Beyond Simple Labelling"](#) extend long-standing advertising ethics to AI, both rejecting blanket labeling in favor of case-by-case disclosure when AI materially alters perceived authenticity. This framework adopts the same approach. The convergence across trade bodies reinforces that materiality rather than content type or percentage of AI involvement is the right disclosure trigger for the advertising industry.

Implementation Roadmap

Building a comprehensive AI disclosure framework requires coordinated action across the advertising ecosystem. This roadmap translates the principles and requirements outlined in previous sections into a practical, phased implementation plan that addresses the core question: How do organizations operationalize the "Do we disclose? What? When? How?"

This roadmap describes a reasonable pace for organizations building disclosure capability from a standing start. It is not a compliance schedule. Where binding requirements are already in force, including the EU AI Act's Article 50 transparency obligations, the New York Synthetic Performer Disclosure Law, and comparable requirements in APAC markets, advertisers operating in those markets must meet the applicable legal deadline regardless of where they sit in this roadmap. Organizations with existing exposure should compress Phase 1 and Phase 2 accordingly.

Phase 1 (0 – 6 Months): Foundation

Objective: Establish clear accountability, team readiness, and pre-publication review before large-scale implementation.

Key Actions

- **Assign a Lead (within 60 days):** Organizations should designate one person within marketing operations, brand safety, or compliance as the AI Disclosure Lead. This person serves as the go-to resource for disclosure questions and coordinates with legal on ambiguous cases. They are not meant to be an approval bottleneck. The goal is to make disclosure decisions routine across all teams rather than centralize every decision through one person.
- **Team Training:** The AI Disclosure Lead conducts concise sessions with creative, production, media, and comms teams so each function can apply disclosure thresholds directly in daily work.
- **Quality Assurance Processes**
 - Use a Pre-Launch Checklist. Every campaign using AI should pass through a brief disclosure checklist before launch:


 - Was AI used in this campaign? (Yes/No)
 - What AI tools or applications were used?
 - Does this require disclosure per the framework? (Check decision tree)
 - If yes, is disclosure language present and visible?
 - This checklist should live in existing workflow tools (project management software, trafficking systems, approval platforms) rather than requiring a separate process.
- **Integrate Disclosure Review into Existing Legal Review.** Legal teams already review creative for claims substantiation, regulatory compliance, and brand risk. Add AI disclosure to this existing review process. Legal confirms whether disclosure is required per the framework and whether the disclosure language is appropriate. This ensures compliance without creating a separate approval layer.

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Deliverables

- Training materials and recorded sessions

Phase 2: Pilot and Operationalization (Months 6 – 12)

Objective: Test disclosure mechanisms in live campaigns, evaluate consumer and operational impacts, and begin building technical infrastructure to support disclosure at scale.

Key Actions

- **Pilot Campaigns:** Launch controlled pilots across different AI use cases and disclosure methods. Start with one or two content types (e.g., image and video) to keep pilots manageable.
- **Measure What Matters:** Track pilot metrics across three dimensions:



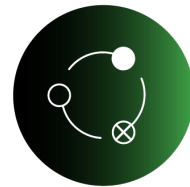
Consumer Awareness and Comprehension

Label noticeability, understanding of label, impact on trust, and brand perception



Performance Impact

Click-through rates, conversion rates, engagement metrics



Operational Friction

Time required for disclosure decisions, error rates in implementation

- **Cross-Partner Collaboration:** Coordinate with platforms (e.g., Meta, YouTube, TikTok, programmatic partners) to understand platform policy requirements and technical capabilities to ensure disclosures appear consistently across ad placements and formats.
- **Provider Compliance:** Update partner contracts and creative briefs to include AI disclosure requirements. Organizations with technical maturity may begin requiring C2PA-aligned metadata from providers.

Deliverables

- Pilot campaign performance report (including impact on performance and operational friction)
- Revised provider and agency agreements

Phase 3: Scale and Refinement (Months 12 – 24)

Objective: Scale disclosure practices across all relevant campaigns and content while establishing ongoing measurement and governance to ensure sustained compliance.

Key Actions

- **Enterprise Rollout:** Scale disclosure practices across all relevant campaigns and content, operationalizing lessons learned from pilots. Streamline approval workflows and automate compliance checks wherever possible to reduce manual burden.
- **Measurement Framework:** Establish ongoing measurement assessing effectiveness (campaign performance

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and consumer sentiment). Recognize that consumer response to AI disclosure will evolve as familiarity increases. Initial reactions may reflect novelty rather than long-term impact. Track trends over time rather than drawing conclusions from early data.

- **Policy Updates:** Monitor regulatory developments and adjust disclosure guidance as new requirements emerge.
- **Build Technical Infrastructure:** Begin evolving systems to support disclosure at scale. Creative management systems need fields to flag AI-generated assets with disclosure requirements automatically surfacing during trafficking. Ad servers require the capability to append disclosure language based on campaign tags. CMS platforms need automated labeling for AI-generated content.

Deliverables

- Performance and sentiment tracking report
- Automated compliance tooling integrated into existing systems

Success Metrics

Implementation effectiveness should be evaluated using measurable indicators:

How to evaluate the effectiveness of AI disclosure implementation?

Performance Impact

Compare campaign results with and without disclosure.



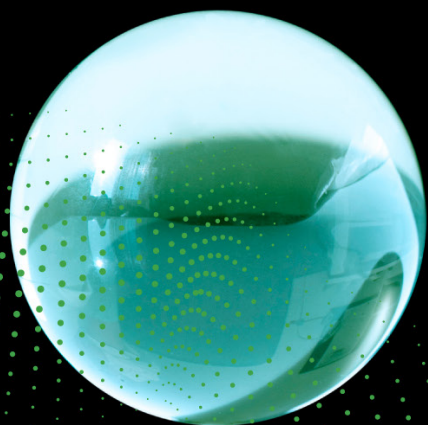
Operational Efficiency

Focus on reducing time and errors in disclosure processes.

Takeaway

Successful implementation requires treating AI disclosure as an ongoing operational capability, not a one-time compliance project. The phased approach allows organizations to build competency progressively while adapting to evolving expectations. The goal is institutionalizing disclosure practices so thoroughly that they become automatic, positioning organizations to innovate with AI confidently while maintaining consumer trust and regulatory compliance.

Future Outlook



Future Outlook

The next phase of AI transparency will be shaped by three converging forces: real-time content generation, advances in provenance technology, and evolving consumer and regulatory expectations. Each is already reshaping, and will continue to redefine, what constitutes sufficient disclosure and how it can be operationalized at scale.

Real-Time Personalized AI Advertising

AI is increasingly generating ads in real-time, customized for each user. A recent [Cadbury campaign](#) produced 130,000 unique AI videos for local Indian businesses, demonstrating both scalability and disclosure complexity. This framework addresses personalization through system-level disclosure rules applied at serve time: Because individual outputs cannot be reviewed by a human before exposure, the advertiser defines at the system level which components or generation paths trigger disclosure, and the generative system applies the required disclosure to the specific outputs that include a triggering component. The materiality judgment is made once, in defining those rules; the system executes it per output.



Advances in Provenance, Watermarking, and Detection

Technical transparency is maturing. Platforms including Google, Adobe, and OpenAI are expanding the use of C2PA content credentials and watermarking systems such as SynthID to provide assertive provenance metadata at creation. These mechanisms are moving toward interoperability across media formats and integration into publishing workflows, enabling continuous verification of origin and modification history. However, provenance alone cannot guarantee audience understanding; metadata is invisible to consumers and susceptible to removal or manipulation. Thus, effective adoption pairs assertive provenance with visible human-facing labels and contextual information, as outlined in this framework.

Regulatory Evolution and Enforcement

The regulatory landscape is fragmenting and will continue to evolve.

This fragmentation creates dual challenges:

- 1. Consumers face confusion** navigating inconsistent label types and meanings across platforms and jurisdictions.
- 2. Advertisers bear significant operational burden** complying with divergent requirements for cross-border campaigns.

Brands failing to disclose material AI involvement will increasingly risk enforcement, backlash, and reputational damage.

Evolving Consumer Expectations

As AI usage becomes ubiquitous, the meaning of disclosure will evolve from novelty to norm. Early friction, including confusion, skepticism, and/or “label fatigue,” is expected to diminish once standardized labels are consistent and contextual. Periodic industry calibration will be needed to reassess thresholds as familiarity rises and risk tolerance shifts.



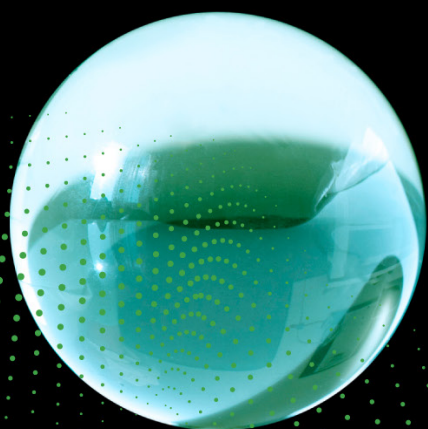
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Takeaway

Future transparency will rely on automation, interoperability, and adaptive governance. Disclosure will move from static labeling toward system-level assurance with machine-readable provenance verified at scale and human-facing clarity delivered consistently.

That said, this framework reflects a moment in time within a rapidly evolving landscape. Consumer expectations, regulatory interpretations, and platform practices will continue to shift as AI becomes normalized. Maintaining trust will require ongoing recalibration of disclosure norms rather than adherence to a static rule set.

Recommendations & Next Steps



Recommendations & Next Steps

Minimum Viable Practices (MVP)

IAB recommends that advertisers, agencies, publishers, and platforms implement the following baseline actions:

- **Assign an AI Disclosure Lead** within marketing operations or compliance to oversee materiality assessments, documentation, and internal training.
- **Adopt the two-layer disclosure model outlined in this framework:** (1) human-facing disclosures when AI involvement materially misleads a consumer, and (2) C2PA metadata to ensure machine-readable provenance.
- **Integrate IAB disclosure thresholds into creative and production workflows using a pre-launch checklist:** Was AI used? What tools? Does this trigger disclosure? Is the label present and visible? Disclosure decisions should occur pre-launch, not retroactively.
- **Document AI use** across campaigns to support auditability.
- **Use the sparkle icon** as the recommended visual indicator or appropriate, plain-language text labels such as "AI-generated image" or "AI-generated person") applied visibly and consistently, per IAB and accessibility guidelines.

These practices can be implemented within 60 days utilizing existing workflows.

Industry Alignment Actions

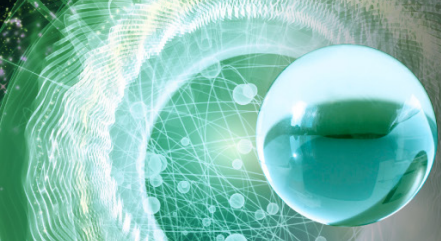
Cross-sector coordination is essential to avoid fragmentation and establish trust:

- **Establish provider alignment.** Update creative briefs and contracts to include AI disclosure. Agencies and providers should flag AI involvement and apply disclosure when thresholds are met.
- **Pilot C2PA integration.** Once the IAB assertion schema is published, test the custom assertions (com.iab.threshold, com.iab.disclosure) across platforms to verify metadata accuracy and enforcement consistency. Advertisers interested in early implementation should contact IAB.
- **Prepare for platform enforcement.** Publishers and platforms are encouraged to flag or reject ads where advertiser-supplied C2PA metadata indicates disclosure is required but no consumer-facing disclosure is present.
- **Provide education and training.** Establish role-specific training for staff on consumer transparency and disclosure obligations.

Priority Areas for Future Standards Development

The following areas require ongoing standards work and cross-industry research:

- **IAB Tech Lab metadata specification.** Develop advertising-specific C2PA assertions (com.iab.threshold, com.iab.disclosure) integrated with OpenRTB, VAST/VPAID, and ad serving protocols to enable programmatic disclosure verification.
- **Verification protocols.** As third-party mechanisms become available to confirm disclosure claims, detect metadata tampering, and validate label-metadata alignment, and integrate them into best practices.
- **Cross-jurisdictional consistency.** Continue engagement with ICAS, EASA, and other trade bodies to harmonize AI disclosure standards across markets while maintaining a risk-based approach.



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Call to Adoption

IAB encourages all members to:

- Publicly commit to the framework principles of transparency, proportionality, consistency and clarity.
- Pilot implementation across at least one campaign within six months.
- Share outcomes and feedback to inform future development.

Early adoption positions the industry to maintain consumer trust, ensure responsible innovation, and avoid regulatory mandates. By embedding transparency into creative, operational, and technical layers, the advertising ecosystem can lead in defining credible, scalable AI disclosure practices that sustain both trust and growth.