Clickbait Cures: Unmasking the Deceptive Health Ad Infrastructure on Meta and Google

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Reset·Tech

Executive Summary

This investigation exposes how multichannel affiliate marketing programs promote unregulated and potentially dangerous nutraceutical products in the EU. Our data collection builds on a pre-selected list of 390 products promoted across social media ads on Facebook and Google and targeting all EU countries. These products are advertised with unfounded medical claims, i.e., direct statements that they can cure chronic diseases such as diabetes or psoriasis or manage life-threatening conditions such as arrhythmia and high blood pressure. 20 percent of the products from this list have been flagged by official health authorities in the EU and other countries as illegal or dangerous to consumers.

Despite all this, their promotion on social media continues. We collected 350,549 Facebook ads and 2,073 Google ads launched between 2023 and 2026. The total EU reach of these Facebook ads is almost 878 million. The Google ads received between 5.9 million and 8.3 million impressions in the EU.

These advertising campaigns are characterized by numerous violations of the platforms' own policies on both the content level (ads) and the behavioral level (advertisers).

On Facebook, ads and advertising pages impersonate medical doctors and celebrities and misuse the logos of pharmaceutical companies and other organizations to lend credibility to the promoted products. The content of these ads violates Meta's advertising policies against treatments for incurable diseases, promotion of body dysmorphic images, pornography and adult nudity, trademark infringements, and ad cloaking. The advertising pages operate in coordination, and some originate from large-scale networks of automatically created burner accounts, previously known to Reset Tech and activated continuously since 2022 across multiple scam campaigns as well as the Russian influence operation Doppelganger. These pages repeatedly violate Meta's policies on coordinated inauthentic behavior (CIB), yet the platform has allowed them to run ads for years.

On Google, networks of non-EU advertisers based in Brazil and Vietnam are allowed to run medical ads in the EU, with the platform leaving compliance with EU advertising standards to the advertisers' discretion. Google's Ads Transparency Center does not allow full insight into these campaigns due to limited search functionalities.

Neither Facebook nor Google systematically deplatforms problematic advertisers; instead, they focus mostly on removing individual ads. Unless addressed at a network level with stricter rules on health-related advertising, these campaigns will continue.

The platforms’ failure to mitigate these advertising campaigns constitutes a direct violation of Articles 34 and 35 of the EU's Digital Services Act (DSA) regarding systemic risks to public health and the obligations of Very Large Online Platforms (VLOPs). Our investigation offers recommendations to platforms and regulators on how to address such high-risk advertising campaigns more effectively.

Contents

More to come: This report is part one of our Clickbait Cures series and focuses on advertising campaigns on Facebook and Google. Visit reset.tech/resources/clickbait-cures for more.

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Preface

We use the term "nutraceuticals" to refer to the products analyzed in this investigation because it reflects the wide variety of product types involved, ranging from dietary supplements and herbal extracts to bioactive ingredients. Another reason to use this term is that the investigated advertising campaigns are referred to as "nutra" or "nutra affiliate marketing" by the companies, networks, and individuals participating in them.

The social media advertising campaigns are top-of-funnel entry points in a multichannel marketing scheme designed to promote unregulated nutraceuticals in the European Union (EU) through a vast ecosystem of interconnected websites, landing pages, social media accounts, and other digital assets.

Paid traffic flows through a typical funnel infrastructure: from ads to pre-landers (e.g., advertorial-style content pages), landing pages, and checkout pages for direct orders. On top of the advertising funnel sits a large network of misleading websites. Some of these domains previously belonged to legitimate entities, such as hospitals or research

centers, but were acquired by third parties and repurposed to promote nutraceuticals from the analyzed list. Together with coordinated networks of social media accounts, fake review websites, YouTube channels, and ResearchGate articles, among other assets, these health-related websites operate as a multi-channel "fake-authority ecosystem" designed for coordinated, SEO-driven authority-building tactics that increase search engine results page (SERP) rankings and organic visibility for product-related searches.

This investigation series is structured into three parts to examine the three components of the nutra affiliate marketing machine: how products are advertised on social media, how credibility is manufactured to drive conversions via a fake-authority ecosystem, and how the business model operates across the EU. It identifies the companies and main beneficiaries of these campaigns, what tactics they use, and what regulators can do to stop them.

1. Introduction: The Global Nutraceutical Market

Rapid expansion in preventive health and wellness industries has positioned nutraceuticals as a key segment of the global health economy. Projected to reach USD 1.12 trillion worldwide by 2034 and USD 196 billion in Europe by 2030, the industry is expanding rapidly, boosted by various factors. Europe's specific demographic situation, characterized by an aging population and a growing demand for preventive healthcare, favors the market for nutraceutical products addressing age-related concerns. This trend has been further accelerated in recent years by global health crises such as the COVID-19 pandemic. However, the interest is not limited to older demographics. Market research shows that younger consumers in developed markets are also increasingly invested in their health, seeking dietary supplements to boost vitality and performance. Similarly, increasing awareness of chronic conditions like diabetes, obesity, and nutrient deficiencies encourages consumers to seek preventive nutrition through dietary supplements.

As a result, the market has experienced an explosion of products tailored to a wide range of audiences and health needs. This rapid expansion raises questions about scope, terminology, and—of course—regulation. The next section clarifies the term “nutraceuticals,” examining the diverse range of products grouped under this label.

1.1. Nutraceuticals in Regulatory Limbo

Nutraceuticals are products derived from various food sources and designed and intended to provide health benefits beyond their basic nutritional value. A portmanteau reflecting their unique position at the intersection of nutrition and pharmaceutical drugs, the term "nutraceutical" does not constitute a clear-cut legal category that would allow such products to be universally regulated. Instead, it remains a layperson’s umbrella term encompassing diverse product groups and substances, including dietary supplements (vitamins and minerals), fortified foods or functional foods (e.g., nutrient-dense beverages, energy bars, or vitamin-enriched foods), herbal extracts (or "botanicals," which can be defined as plant-produced nutraceuticals), bioactive ingredients (e.g., phytonutrients), pro/prebiotics, food additives, and other food-derived products.

The broad definition of “nutraceutical” and the grey area that these various products occupy on the spectrum between medicines and foods pose significant challenges for regulators in both the health and food industries. For the purposes of this report, we look at the regulatory framework in the EU and North America (Canada and the United States [US]), as these are the world's largest markets for nutraceuticals worldwide.

Across all three markets, nutraceuticals occupy a “legal limbo,” with some products being classified as medicines and others as supplements or food, primarily based on their intended use and marketing claims rather than their ingredients alone. Neither the US Food and Drug Administration (FDA) nor the EU recognizes “nutraceutical” as a legal term. The FDA uses the category of “dietary supplements,” as defined under the Dietary Supplement Health and Education Act of 1994. Botanicals and some herbal ingredients also fall into this category. In contrast to pharmaceutical drugs, dietary supplements in the US do not require regulatory approval to enter the market. However, another term recognized by the FDA, “botanical drugs,” which may include products such as teas, powders, elixirs, or capsules that share ingredients with dietary supplements, falls under a different regulatory category and requires market approval by the regulator.

In the EU, the legal term for such products is "food supplements" (Directive 2002/46/EC), and the responsible authority is the European Food Safety Authority (EFSA). The EFSA does not issue premarket approvals for food supplements, as the European Medicines Agency (EMA) does for medicines. In the EU, food supplements are regulated as foods. On the EU-wide level, the EFSA provides scientific opinions to support EU decision-making on specific substances. Similar to the US, some products are more regulated than others. For example, the category “herbal medicinal products,” which may share ingredients with food supplements, falls under the authority of the EMA under Directive 2004/24/EC. The EMA provides advisory functions and some harmonization of herbal products; however, their licensing and distribution fall under the responsibility of the national authorities in the Member States.

In Canada, the national regulator Health Canada recognizes both the terms “nutraceuticals” and “functional foods,” as well as the regulatory challenges that arise from their unique position between pharmaceuticals and food. Nutraceuticals are regulated as either “natural health products” (classified as medicines) or “supplemented foods” (classified as supplements) under the Food and Drugs Act. In contrast to the US and the EU, both products require premarket approval from the regulator regarding their ingredients in accordance with the List of Permitted Supplemental Ingredients and the List of Permitted Supplemented Food Categories.

1.2. Pre-Market Controls and Public Health Risks

The borderline regulatory status and the diversity of nutraceuticals, combined with reduced premarket controls, leave ample room for unsafe, low-quality, or otherwise questionable products to reach consumers. Although regulatory authorities can withdraw products at a later time, the risks to public health remain high. For example, in the US, the FDA has acknowledged structural limitations in its oversight of dietary supplements, noting it lacks systematic visibility into when new supplements enter the market.

In the EU, regulatory fragmentation between national and EU authorities poses additional problems. New data from the EU's Rapid Alert System for Food and Feed points to systemic

challenges in preventing unsafe or mislabeled food supplements from entering the EU market. Although the European Commission (EC) restricts vitamins and minerals to permitted lists (Directive 2002/46/EC) and assesses lists of "novel foods" and substances, many substances remain underregulated: for example, botanical and bioactive ingredients that can be mixed into various nutraceutical products are regulated individually at the Member State level, as there is no EU-approved list of such substances. Research also indicates that the lack of post-market surveillance of botanicals poses long-term public health risks.

Despite having a stricter pre-market approval regime than the US or the EU, Canada still faces problems with adulterated products, undeclared substances in natural health products, or unauthorized products entering the market through illegal and/or online channels.

1.3. Health Claims and Advertising

All regulators across the EU, the US, and Canada draw a clear distinction between "health claims" and "medical claims" in the labeling and commercial advertising of medical drugs and health-related products. While the terminology differs, the underlying principle is the same: only registered drugs can make medical or therapeutic claims. Nutraceuticals (be they dietary supplements, food supplements, supplemented foods, or other terms used to describe these products) cannot claim to diagnose, treat, cure, or prevent disease unless authorized as medicines. These products can only make health claims, i.e., statements that suggest a relationship between a product (or one of its ingredients) and human health, such as a statement saying that a nutrient "supports normal bodily functions."

In the EU, Regulation (EC) No 1924/2006 sets out detailed criteria for nutrition and health claims in commercial communications (including advertising). The EU Register of Nutrition and Health Claims lists permitted health claims to be used by food business operators, stressing that such claims "must be accurate, scientifically substantiated, and not misleading." Regulation (EU) No. 1169/2011 also establishes strict, legally binding rules to ensure that labeling, advertising, and presentation of food supplements do not mislead consumers.

Similar restrictions apply in Canada: under the Food and Drugs Act, only a specified range of health claims may be made for foods; otherwise, they need to be classified as drugs. In addition, Section 3 of the Canadian Food and Drugs Act prohibits selling or advertising to the general public "any food, drug, cosmetic, or device represented as a treatment, preventative, or cure for diseases listed in Schedule A (e.g., cancer, diabetes, heart disease)."

In the US, health claims of dietary supplements can only refer to claims about risk reduction of specific conditions. Statements that a product can treat, prevent, cure, or mitigate a disease are reserved for approved medical drugs. The FDA also offers a list of authorized health claims.

The uniformity of regulatory frameworks across the EU, the US, and Canada regarding permitted health claims and prohibited medical or therapeutic claims leaves no areas for misinterpretation as to how the promotion of such products should go.

The social media advertising campaigns we analyzed operate in clear disregard of existing regulatory rules, making unfounded medical claims about treating various diseases. Nutraceutical products claiming to cure diabetes or high blood pressure may pose serious health risks, for example, by delaying or replacing patients' legitimate medical treatment. The advertising campaigns, which we will analyze in this part of the investigation, target a particularly vulnerable group: individuals living with chronic illnesses who are searching for treatment online.

In sections 4 and 5, we will focus on social media platforms' potential violations of the EU DSA with regard to the systemic risk and harms to public health caused by these campaigns.

1.4. Authority Warnings about Dangerous Products

The online segment of the nutraceutical market is particularly concerning for regulators, as it is the least regulated and the fastest growing. Globally, online sales of dietary supplements are projected to grow by 9.5 percent per year until 2034. In numerous instances, little is known about the quality, composition, or safety profile of the products or ingredients sold online. Regulatory authorities typically intervene only after products are already on the market.

For example, the FDA alerts US consumers about the online promotion of fraudulent medical products marketed through emails and ads. EU authorities also issue public warnings. In one case, in September 2025, the EMA warned about illegal health products being marketed online in the EU, including unauthorized medicines sold via fraudulent websites. The article mentions "hundreds of fake Facebook profiles, advertisements, and e-commerce listings, many of which are hosted outside the EU," as well as fraudulent websites and social media ads misusing official brand logos. Our investigation shows that the scale of these advertising campaigns in the EU is substantially greater than what has been reported by the EMA.

Occasionally, specific nutraceutical products get red-flagged by authorities. Between 2018 and 2025, 20 percent of the products analyzed in this investigation (76 of 390 products) have been flagged by national regulators and consumer safety organizations as illegal, unsafe, or harmful (see the full list of these products in the Appendix). The following are a few examples of official warnings for products in our list: In 2018, the US FDA did a laboratory analysis and published a warning against "ABslim," a product promoted for weight loss, for dangerous ingredients found in the packages. In 2021, Australia's Therapeutic Goods Administration issued a similar warning on "ABslim." In 2020, Czechia's Ministry of Health published a warning about "HondroStrong," a product for joint pain. Also in 2020, the Health Inspectorate of the Republic of Slovenia warned about online advertisements for several products, including "Detonic," a dietary supplement on

our list advertised as a remedy for detoxification. In 2022, the Austrian Federal Office for Safety in Health Care (Bundesamt für Sicherheit im Gesundheitswesen [BASG]) issued a notice regarding "Gluconol," a supplement for the treatment of diabetes advertised online, classifying it as an illegal drug due to its medical claims. In 2025, the BASG also classified "Cardione," a product for treating hypertension, as an illegal medicinal product because of its claims. The Colombian National Institute for Food and Drug Surveillance (Instituto Nacional de Vigilancia de Medicamentos y Alimentos [INVIMA]) warned against 11 nutraceuticals from our list, declaring them illegal to sell in Colombia because of their medical claims. For example, INVIMA published an alert about "Cardiotens Plus" (Alerta No. 145-2025 CARDIOTENS PLUS – 15/05, full text here), a supplement targeting patients with cardiovascular diseases, and urged citizens not to purchase it. INVIMA also issued multiple warnings against "Diaform RX," another dietary supplement advertised online and targeting patients with diabetes (Alerta Sanitaria No. 043-2023). Between 2019 and 2025, Greece's National Organization for Medicines (EOF) issued warnings about 27 nutraceuticals, some of which are products from our list, for purported treatments for diabetes or cardiovascular disease, as well as other conditions such as arthritis, obesity, erectile dysfunction, etc. For example, the EOF issued a warning against "Cardiotensive," advertised with therapeutic indications such as treatment of arrhythmia or venous thrombosis, and against "Diaxil," a product falsely claiming to treat diabetes. In 2023, Slovenia's Agency for Medicinal Products and Medical Devices (JAZMP) issued alerts about 22 nutraceuticals from our list, among which were four products for the treatment of diabetes ("Inspilar," "DiaTea," "Diaform," and "Gluconol").

Consumer organizations in the EU have also reacted against these products. In April 2025, Italy's Altroconsumo published an article about online advertising campaigns targeting patients with claims to cure various diseases: the article focused on the potential dangers of "Cardiotensive." In May 2025, Germany's National Consumer Advice Center, Verbraucherzentrale, which is also a trusted flagger under the EU DSA, published a warning about 88 nutraceuticals, many of which were already in our core list of products. The article focused on the promotion of these products through misleading ads claiming to treat various medical conditions.

Despite these warnings, misleading advertising campaigns promoting these exact products continue to run on social media. Thousands of fraudulent health-branded websites list these products for online sale. This investigation focuses on campaigns targeting EU audiences, which constitute some of the most consolidated promotional activities, although similar advertisements are also directed at global audiences. Monitoring and flagging these campaigns requires a coordinated approach, and we hope this investigation helps regulators in the EU and other countries to address the problem more effectively.

The next section outlines our methodology for compiling the list of products.

2. The Nutraceutical Products: Identification and Selection Criteria

This report builds on a pre-selected list of 390 nutraceuticals promoted across social media ads on Facebook and Google between 2023 and 2026 and targeting EU countries. These products are manufactured and distributed by different companies, some of which operate outside the EU and have different safety profiles, ranging from likely low risk to misleading or potentially dangerous regarding the medical claims they make. The common denominator between all products is that they are advertised on social media platforms with medical claims that go far beyond what is realistically treatable with over-the-counter medication.

We did not start with a consolidated list of products. The list grew as the data collection progressed. In our first investigation from 2024, we identified around 20 nutraceuticals promoted on Facebook. Some of these products had already been flagged as potentially dangerous by official health and consumer authorities in the EU, the US, and other countries. We continuously expanded the monitoring. For example, after new announcements were made by the National Consumer Advice Center (Verbraucherzentrale) in Germany in May 2025, we added a few products to the list. Our initial focus was on social media advertisements for nutraceuticals that target serious diseases such as diabetes. Later on, we expanded the list to include products addressing other medical issues, such as joint pain, urinary incontinence, obesity, sexual dysfunction, and skin problems.

To decide whether to include a product in our list, we relied on the co-occurrence of three indicators: first, we looked for social media ads promoting the product across platforms. Aside from a few exceptions with one-platform promotions, all the products in our list have been advertised on both Facebook and Google. The second indicator was overlap between products promoted by the same advertiser. When an advertiser had promoted a product already on the list, we reviewed all the other ads to identify any additional products being promoted by that account. The third indicator was the presence of the product on a pre-selection of coordinated vending websites. These websites operate either as fake patient review portals, designed to mimic independent consumer feedback, or as direct e-commerce pages selling the products. This triangulation between social media ads, advertisers, and websites reinforced our conclusion that we are analyzing coordinated campaigns promoting the same products across multiple platforms. More information on the websites selling the products will be provided in the forthcoming second report of this Clickbait Cures series.

Furthermore, all of the 390 products in our list are sold on vending websites that also feature at least one product flagged as potentially dangerous or misleading by official health authorities between 2018 and 2025. We highlight this overlap not to make general assumptions about the safety profile of all nutraceuticals in the list, as we do not claim they are all dangerous to consumers, but rather to show that these products circulate within a shared ecosystem that

merits regulatory scrutiny. A sample of the product list, focusing on products flagged by health authorities and featuring the three criteria for product inclusion, is provided in the Appendix. The third part of the Clickbait Cures series will focus in more detail on the safety profile and origin of these 390 nutraceuticals.

The next section outlines the methodology for data collection of social media ads promoting the nutraceuticals from our list.

3. Methodology and Data Collection

Our data collection includes social media ads targeting EU audiences between 2020 and 2026 on Facebook and between 2023 and 2026 through Google. We collected advertisements in several iterations between 2024 and 2026. For both platforms, we managed to collect advertisements older than 2024 that were still available at the time of checking. In a report published in 2024, we analyzed an earlier phase of the advertising cycle based on a sample of 35,000 Facebook ads. In the present investigation, we combine all the advertisements collected throughout the years to illustrate the evolving tactics and long-term presence of these campaigns on the platforms.

3.1. Data Collection on Facebook

Among all of Meta's platforms, Facebook emerged as the primary channel for advertisers promoting these nutraceutical campaigns. Although we identified a few Instagram ads, the sample was too limited to support any claim of cross-platform promotion on Meta. We collected Facebook ads using three methods: keyword searches based on recurring key phrases, searches by product or company names, and searches by specific advertisers.

Searches by Recurring Catchphrases

The advertisements were easier to detect in earlier advertising rounds (2024), as most ads relied on repetitive messages translated and reused across multiple languages. Many ads promoted the products using identical or nearly identical catchphrases in their ad copy and call-to-action (CTA) texts. One recurring slogan, "Why are the pharmacies silent?" appeared in ad copy across all official EU languages. Other catchphrases referred to concrete diseases, for example, "Diabetes disappears in three days," "Urologists are surprised," or "Headache, numbness in the limbs, or tinnitus?" These phrases were translated and replicated in thousands of identical multilingual advertisements. As Meta's Ad Library allows keyword searches based on longer phrases, collecting ads with these phrases was the easiest step to expand the dataset.

Searches by Product Names or Company Names

With the evolution of the promotional activities, the messaging became more diversified, and catchphrases were no longer universally used. In 2025 and 2026, we shifted our approach and primarily conducted searches by product names to expand the ad collection. Although the products were not typically mentioned in the ad copy, their names appeared on product packaging shown in the ad images. Searching for product names in Meta's Ad Library allowed us to retrieve these image-based advertisements.

We also ran searches mentioning the names of two pharmaceutical companies—Pfizer and Bayer—as their logos appeared on multiple ad images. These company logos were systemically misused for years in the advertisements to imply endorsement and enhance the perceived legitimacy of the promoted products. Keyword searches based on these names yielded thousands of relevant ads.

Searches by Advertisers

In parallel, we collected ads published by all the identified Facebook advertising pages and reviewed them to expand our collection of nutraceutical ads and identify other nutraceutical products to simultaneously expand the list of products. In some cases, the Facebook pages promoted ads from unrelated scam campaigns, such as online games or investment schemes, which were subsequently excluded from the analysis.

In total, we collected 350,549 ads by 22,320 advertisers launched between 2020 and 2026. Most ads target EU audiences. A small sample identified through product name searches targets audiences outside the EU.

Data Collection Limitations

Our data collection represents just a fraction of the total scale of advertising of questionable nutraceuticals on Meta's platforms. First, our list of 390 products is limited to those products that we were able to triangulate using our three indicators for inclusion (social media ads appearing on both platforms, overlapping advertisers, and products featured on vending websites). Some of the vending websites that we monitor featured catalogues of 600–800 products, but we could not verify all of these products, so a large portion of this shared ecosystem was excluded.

Second, numerous advertising campaigns running on Meta deploy the same tactics or advertising assets but promote nutraceuticals that are not in our larger dataset of potential products.

The last limitation is that certain ad formats could not be reliably retrieved through keyword searches in Meta's Ad Library because they do not explicitly mention product names in the ad copy or in ad images. For example, video advertisements promoting nutraceuticals from our list could not be collected using keyword-based searches.

3.2. Data Collection on Google

We encountered even greater limitations when collecting data from Google.

Google's Ads Transparency Center is designed to show ads in different formats (text, image, or video) and placements (Search, Display, Gmail, or YouTube). However, Google does not allow keyword searches on ad copy, either through the public interface or via programmatic access to the data. The database can only be searched by advertiser name or domain name, meaning that ads cannot be located without knowing the advertiser or the promoted website. Certain ads may not show up at all if they do not promote websites (e.g., brand awareness ads).

This limited our data collection to advertisers or websites that explicitly feature product names. In practice, this meant that we primarily identified search ads designed to drive traffic directly to product-branded landing pages or vendor domains. Google Search ads are text-based ads that appear at the top of Google Search results pages when users search for specific keywords (in our case, the product names).

We developed a two-phase approach to collect these ads. First, we collected all ads promoting domains that contained the names of the 390 identified products (e.g., for the product "Femixal," we identified over 15 product-branded domains, such as femixal(.)hu and femixal(.)store). Through these ads, we identified the names of the corresponding advertisers. In the second phase, we collected all other ads run by the same advertisers to capture additional campaigns. See the following section on data collection limitations for screenshots showing how these ads and advertisers can be identified on the public interface of Google's Ads Transparency Center.

The collection phase yielded a total of 25,000 ads. However, it also surfaced many irrelevant results, as some advertisers were promoting commercial products unrelated to nutraceuticals. Additionally, there were advertisements for other nutraceutical products not included in our original list of 390 items. We reviewed the collected ads and categorized them in two lists: (1) a “core list” consisting of ads that explicitly mention the names of the 390 products and (2) an “expanded list” of ads that promote the 390 products together with other nutraceutical products. We excluded all irrelevant ads and advertisers promoting non-nutraceutical products.

In total, we collected 2,073 ads in the "core list" and 7,332 in the "expanded list." The ads ran between 2023 and 2026. Most ads target EU audiences. A small number of ads identified through product name searches target audiences outside the EU.

Data Collection Limitations

The limited search functionalities and the disappearance of ads from the Ads Transparency Center before we could manually review and categorize them were our main limitations when consolidating the data collection from Google. As a result, our final collection of relevant Google ads almost certainly does not reflect the true scale of the campaign on the platform.

For example, our sock puppet research profiles were served YouTube video ads over the course of the investigation as a result of repeated product searches. The fact that we could not locate

these ads in the platform's ads repository is likely because the names of the landing pages were not product-branded, making them practically undiscoverable with domain-based searches. Additionally, we also observed that inactive Google ads are removed and advertisers disappear from the repository once their campaigns end. We were unable to include a portion of ads from 2024 and early 2025 in our final collection because they were no longer available on the platform by the time we attempted to review and categorize them. We also noticed ads disappearing from the collections of ads that we managed to categorize: for example, as of March 2026, just one month after we collected the last sample, 122 ads were no longer available in the public ad repository.

The screenshots below illustrate the limited search functionalities of the online interface of Google's Ads Transparency Center. We accessed the Ads Transparency Center through Google's official API to retrieve data in an automated manner; however, the API mirrors the functionality of the public interface, offering no keyword-based searchability.

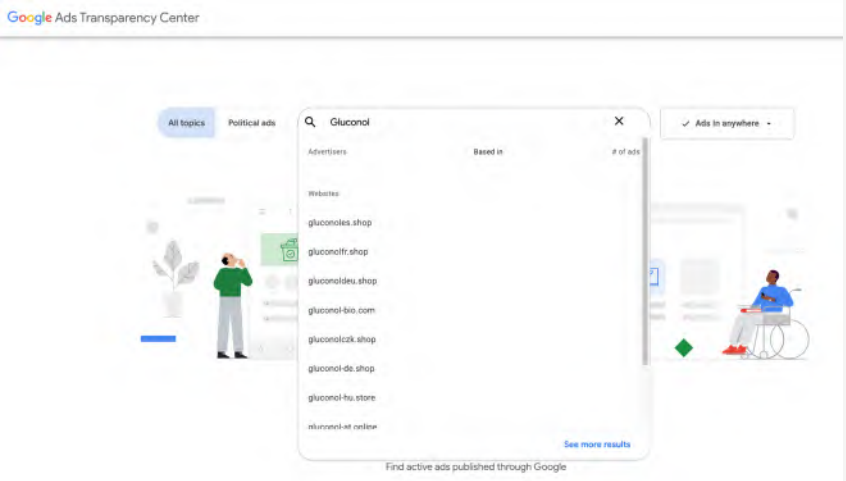

Figure 1: Functionalities of Google's Ads Transparency Center public interface. Keyword searches display a drop-down list mixed with domain names and names of advertisers. For example, typing the product name "Gluconol" yields a list of product-branded domains—gluconolfr(.)shop, gluconoleu(.)shop, etc. All these websites are promoted via text-based search ads launched by different advertisers. Clicking on a domain from the drop-down list displays the corresponding ad and the advertiser's name (see Figure 2).

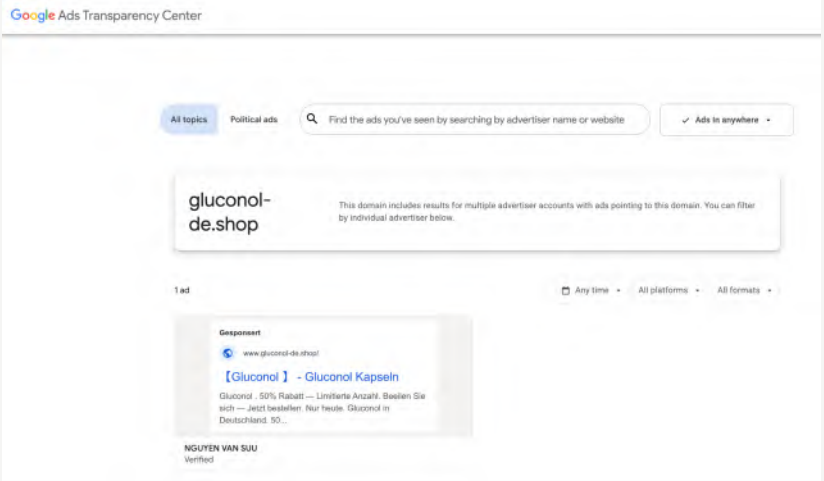

Figure 2: Functionalities of Google's Ads Transparency Center public interface. Clicking on one of the product-branded domains, gluconol-de(.)shop, opens the associated ad. The name of the advertiser, NGUYEN VAN SUU, is also visible: clicking on it opens the repository archive with all ads run by the advertiser. (Source: Google's Ads Transparency Center)

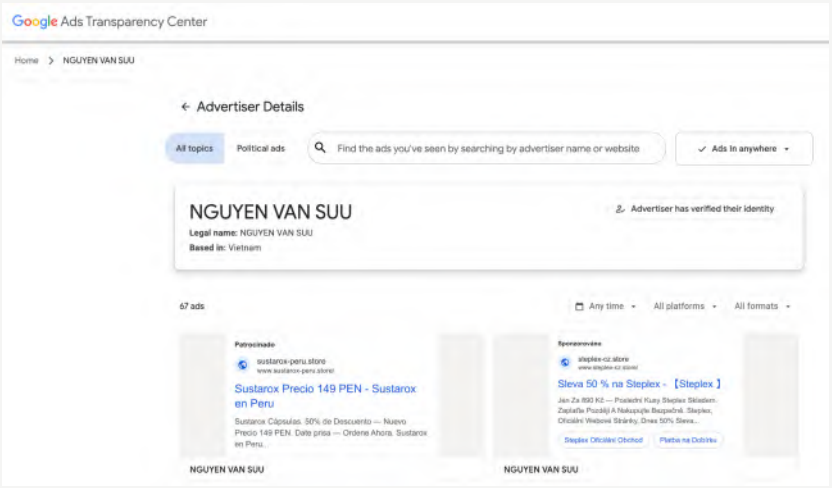

Figure 3: The advertiser NGUYEN VAN SUU (verified, based in Vietnam) ran 67 ads about different products. This is the second phase of ad collection: these ads were collected and reviewed to exclude all irrelevant ads that may promote non-nutraceutical products. (Source: Google's Ads Transparency Center)

Cross-Platform Comparison of Data Collection Methods and Limitations

Ad repository	Ad collection methods	Total ads	Limitations
Meta's Ad Library	Keyword-based search by: ● “catchphrase” ● product name ● company name Search by advertisers	350,549	● Fewer video ads
Google’s Ads Transparency Center	Two-phase approach: ● Domain name search ● Search by advertisers	2,073 core list 7,332 expanded list	● Limited search functionalities ● Mostly text-based search ads ● Large number of irrelevant ads

Table 1: Comparison table between data collection methods for advertisements on Google and Meta.

The next sections address the advertising campaigns on both platforms, with a focus on the campaigns’ tactics, promoted content, and advertising assets across Facebook and Google.

4. The Advertising Campaigns on Facebook

Dietary supplements are typically marketed as products that support health and wellness. The advertising campaigns we analyzed, however, promote a wide variety of content, falling well short of responsible marketing standards and raising serious consumer protection concerns.

We use the plural term “advertising campaigns" to emphasize the fact that various individuals or entities may be behind these promotions as part of their participation in different affiliate marketing programs. However, these advertisers all share the same tactics and assets and promote identical or very similar content. The advertising patterns are consistent with time, which allows us to consolidate our findings across campaigns and view them as part of a single coordinated effort.

These social media advertisements are the primary vessel of a predatory marketing strategy rooted in health misinformation and manipulative medical claims. The ads deploy emotionally laden messages designed to instill fear, anxiety, disgust, uncertainty, insecurities over physical appearance, and/or a sense of urgency to make a purchase—all intended to push users further down the marketing funnel. The content creation tactics include promises of instant “natural” cures to treat diseases; sensationalist stories of miraculous recoveries or sudden deaths; clickbait messages translated across multiple languages; disturbing graphic imagery depicting pain, inflammation, or wounds; body-shaming imagery; and conspiratorial narratives against "big pharma." On Facebook, many ads and advertising pages impersonate legitimate organizations or public figures (celebrities, doctors, or journalists) to lend credibility to the products. These campaigns had been running in a coordinated manner for years prior to our initial discovery, employing networks of automatically created disposable advertising accounts to run the ads.

4.1. Campaign Performance Overview and Key Figures

Facebook remains the primary platform for advertising of nutraceuticals, and for good reason. First, the platform is vast and demographically diverse across all 27 EU countries, which gives advertisers unmatched reach. Second, the granular demographic targeting allows zooming in on older users who are more likely to be interested in health-related products. The low entry barrier for paid ads, combined with precise A/B testing and campaign optimization tools, also helps advertisers to refine their promotional strategies at a minimal cost. Lastly, Meta’s ad review process has repeatedly proven ineffective in preventing problematic campaigns, with scam advertising remaining a persistent source of ad revenue for the company, and Facebook continuing to attract dubious advertisers as a key hub for scams.

Between 2020 and 2026, advertisers promoting the nutraceuticals from our list ran a total of 350,549 Facebook ads across 22,320 pages.

The vast majority of the ads ran between 2023 and 2026, though the presence of earlier ads is noteworthy. Our previous investigations into Meta's advertising model show that commercial advertisements, especially ads from scam campaigns, are routinely removed from the platform's ad repository once their advertising budgets expire. This means the scarcity pre-2023 likely reflects Meta's archiving policy rather than a lack of campaign activity. The campaign was probably running at comparable intensity between 2020 and 2022, but those earlier ads were simply no longer accessible at the time of data collection. Our collection of regulatory alerts supports this hypothesis: EU authorities have been issuing warnings about advertisements for products from our list in 2020 (Hondrostrong) and 2022 (Gluconol), while the US FDA flagged a product (ABslim) as far back as 2018 (see the Appendix for the complete list of regulatory alerts throughout the years).

The ads we collected garnered a total reach of 878 million in the EU. We did not calculate reach for non-EU ads, as Facebook does not provide this data. All EU member states were targeted, with the most frequently targeted countries being Italy (79,252 ads, 132 million total reach), Hungary (43,846 ads, 110 million total reach), Spain (32,960 ads, 88 million total reach), Romania (27,070 ads, 110 million total reach), Germany (24,289 ads, 37 million total reach), Poland (23,093 ads, 87 million total reach), Portugal (22,629 ads, 76 million total reach), France (21,388 ads, 35 million total reach), Austria (14,522 ads, 18 million total reach), and Bulgaria (13,774 ads, 59 million total reach). Many of the ads simultaneously targeted several EU countries or multiple EU regions or cities across different countries, in what appears to be a granular strategy to reach audiences by language.

Top 10 Countries Most Often Targeted by Facebook Ads in Our Sample

Number of ads by targeted EU country, showing the ten most frequently targeted countries; individual ads may target multiple countries.

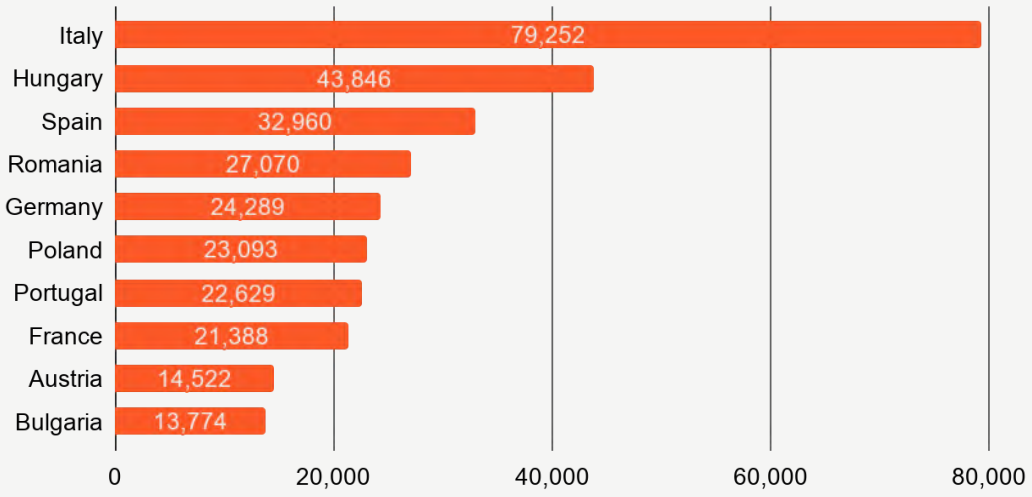

Figure 4: Bar chart showing the top 10 countries targeted by Facebook ads. (Source: Meta's Ad Library)

Note that Facebook defines the metric "reach" as the number of unique users who saw an ad. The advertising reach of 878 million is a cumulative metric over time and across different ads and does not mean that all EU citizens on Facebook have been reached by these ads. For example, if multiple campaigns ran targeting the same audiences, the same person is counted multiple times across ad performance.

The campaign is aimed at older demographic groups, with the majority of ads falling within the age bracket 35+ (154,000 ads); however, this is an understatement, as some ads target broader age brackets like 18–65 or 25–65 (totaling another 100,000 ads). When accounting for overlaps and including all campaigns that reach audiences aged 35 and above, the total number of ads reaches approximately 300,000. The single most often targeted segment is the 35–65 age group (67,108 ads). The campaign skews toward male users, likely due to the high number of advertisements promoting male sexual health products.

The Campaign Timeline: Facebook Ads Launched per Year between 2020 and 2026
Number of ads by year of launch between 2020 and early 2026.

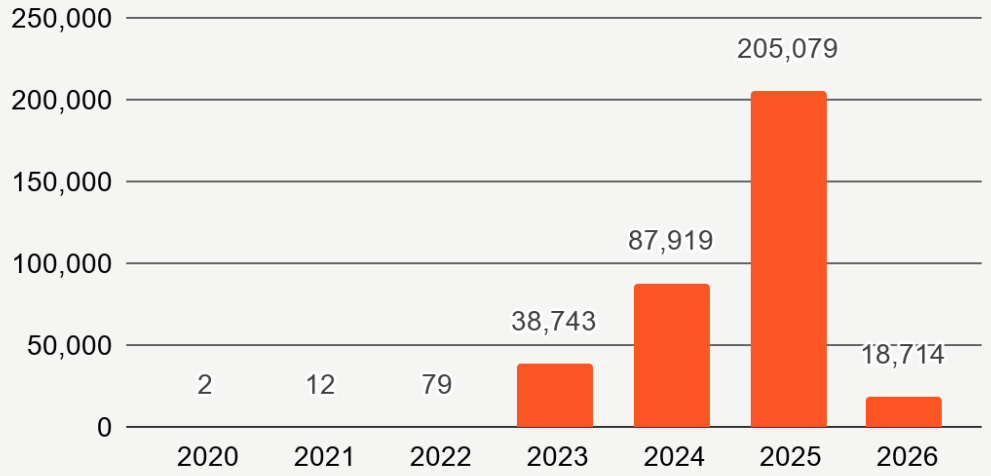

Figure 5: Bar chart showing Facebook ads launched per year (2020–2026). (Source: Meta's Ad Library)

4.2. The Ads: Content, Tactics, and Policy Violations

Despite the large volume of ads and the wide array of promoted products, the advertising activity bears the hallmarks of a consolidated campaign, built around a common playbook of tactics and clear signals of coordination between the advertising pages. While we do not claim that all ads were placed by the same individuals or entities, especially given the campaign's long duration, we can discuss a "recipe" followed unanimously by all advertisers.

The consistency with which some tactics have been deployed over time makes the campaign highly distinctive. Below we outline some recurrent tactics across various ads and products. We focus on problematic health-related content that breaches Meta's advertising policies and on evidence of coordination between advertising accounts.

Deceptive Medical Claims for Chronic Diseases

Many ads include direct medical claims about curing chronic diseases or health conditions. For example, 16,733 ads from the collection mention the word "diabetes" in the ad copy. These ads accumulated a total reach of 31.4 million in the EU. The ads make various statements, from suggesting natural therapeutic methods and presenting questionable "new" research to outright criticizing conventional therapy. The ads include ad copy with proclamations of "magical cures" ("Diabetes disappears! Blood sugar drops in 2 days"), clickbait phrases ("If you have diabetes, read this! The solution has been found"), or statements that directly encourage patients to stop medication ("Insulin is no longer needed: this trick saves you from diabetes").

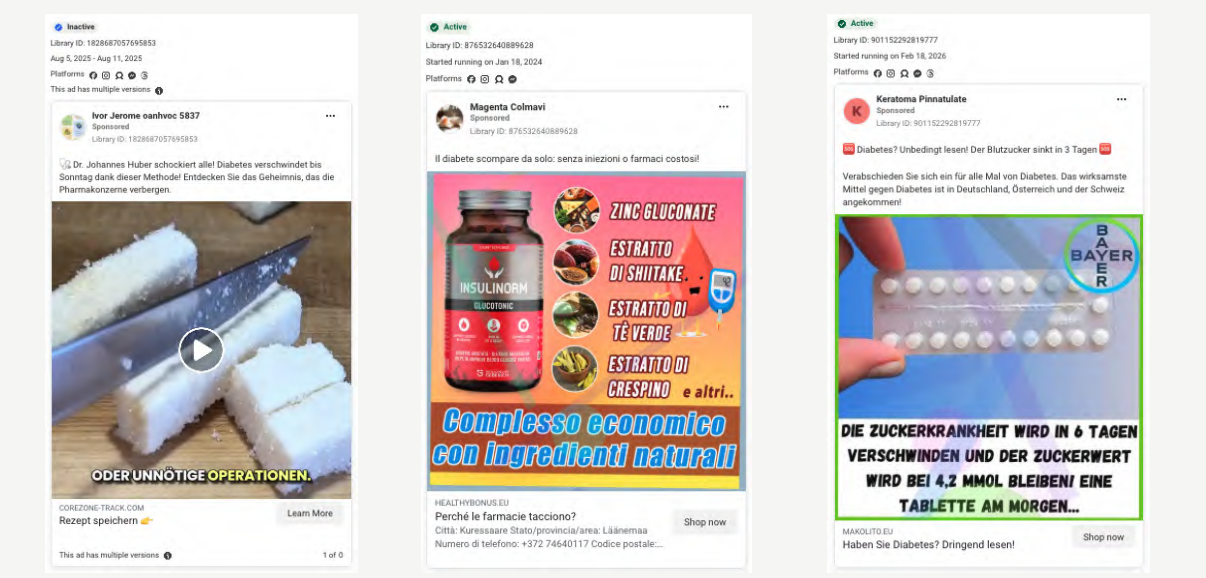

Figure 6: Ads in German and Italian with medical claims to cure diabetes: "Diabetes disappears" and "Blood sugar disappears in six days." (Source: Meta's Ad Library 1, 2, 3)

In total, 1,221 advertisements launched between 2023 and 2026 directly question the efficacy of Metformin, a commonly prescribed medication for type 2 diabetes. The ads promote dietary supplements as effective replacement of Metformin and include fabricated patient testimonials in which individuals claim to have discontinued their prescribed Metformin medication after using the advertised supplement (e.g., Insulinorm). Some ads in Czech attack the safety profile of Metformin, with one example (the ad has since been deleted) claiming that "Metformin is a path to disease and premature death."

These ads carry serious public health risks. Metformin is a first-line evidence-based treatment for type 2 diabetes with over 60 years of clinical data confirming its safety and effectiveness. Encouraging patients to abandon it in favor of unregulated supplements could lead to dangerous and potentially life-threatening spikes in blood glucose.

Although the majority of the Metformin ads have been deleted by the platform, their cumulative EU reach stands at 860,000. The same messaging continues to circulate at the time of writing of this report, with new ads using identical copy to ads launched as far back as 2023: for example, 97 ads attacking Metformin ran in German in February 2026 alone using the following ad copy: "The doctors have been hiding this! Diabetes will disappear in 2 days and my blood sugar will stay at 4.2 mmol forever. Finally, I was able to abandon Metformin, which I had been taking for five years." This repeated reuse of identical ad copy across multiple advertising pages is a strong indicator of coordination, which we discuss in the following section.

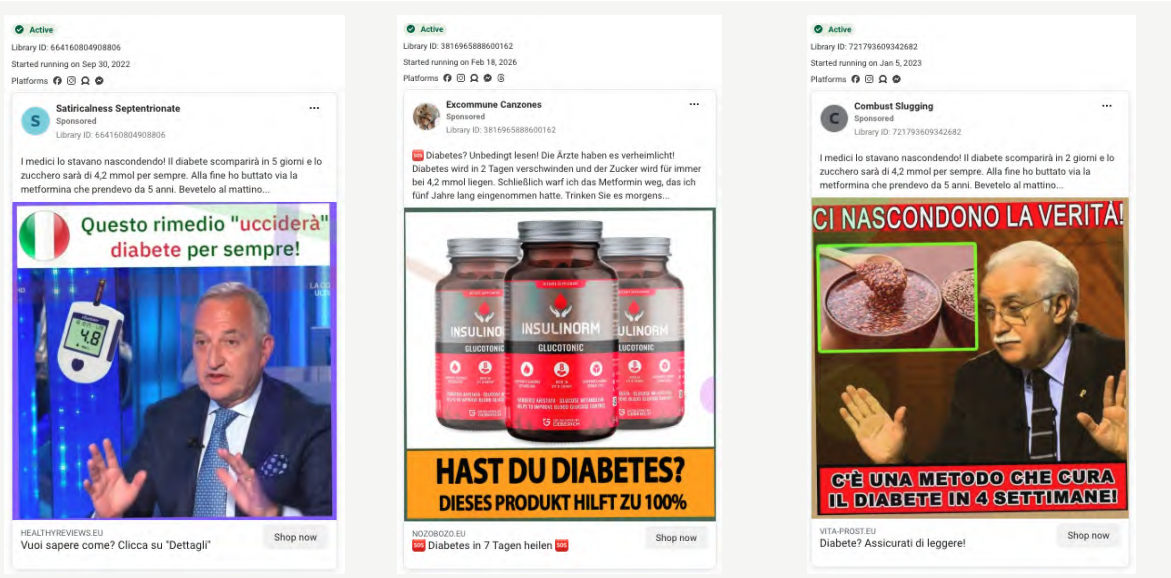

Figure 7: Ads in German and Italian directly claiming that Metformin can be replaced with Insulinorm or that medical doctors have revealed "hidden knowledge" on how to cure diabetes. The advertisement in the middle states that Insulinorm "helps 100%" against diabetes. (Source: Meta's Ad Library 1, 2, 3).

Advertisements for treatment of diseases such as diabetes directly violate Meta's own advertising policies on health-related content. The platform prohibits ads that claim "to cure, heal, or eliminate" incurable diseases under its "Fraud, Scams, and Deceptive Practices" policy, with diabetes listed as the first example. The ads documented in this dataset make precisely such claims, repeatedly and at scale.

Besides diabetes-related content, the campaign promotes ads for nutraceuticals targeting a wide range of medical conditions with claims that are both unfounded and potentially dangerous. Prostate-related conditions are by far the most frequently advertised disease, with

36,543 ads directly referencing prostatitis in the ad copy. These ads garnered a total EU reach of 48.4 million. Similarly to diabetes, many of these ads promise cures for prostate problems, some stressing immediate effects (within days after starting the treatment) and others guaranteeing elimination of cancer risk or satisfaction rates "above 98 percent". Some prostatitis-related ads also cast doubts on conventional medicine; for example, 6,796 ads use the phrase “90% of prostatitis patients are treated incorrectly!"

Many advertisements explicitly discourage medical consultation, instructing users to replace professional care with the promoted product. In 2024, 304 ads in Italian promoting a treatment for psoriasis garnered a cumulative reach of 251,400 with the following ad copy: "Psoriasis is very dangerous. How can you get rid of this deadly autoimmune disease? Solve the problem at home without visiting the doctor!" Similar to diabetes, psoriasis is also featured in Meta's policy list, which prohibits advertisers from promoting treatment for incurable diseases.

Unfounded medical claims and promises for instant healing also promote products for hearing and vision loss, with some ads claiming complete restoration—without surgery, hearing aids, or medical intervention—achieved from a single capsule. Products for the treatment of varicose veins are touted to eradicate the conditions in three days at home, while hypertension ads promise that blood pressure normalizes in seconds. Other ads making unfounded medical claims to treat urinary tract infections, incontinence, bronchitis, hemorrhoids, joint pain, weight loss, and erectile dysfunction also appear prominently throughout the campaign.

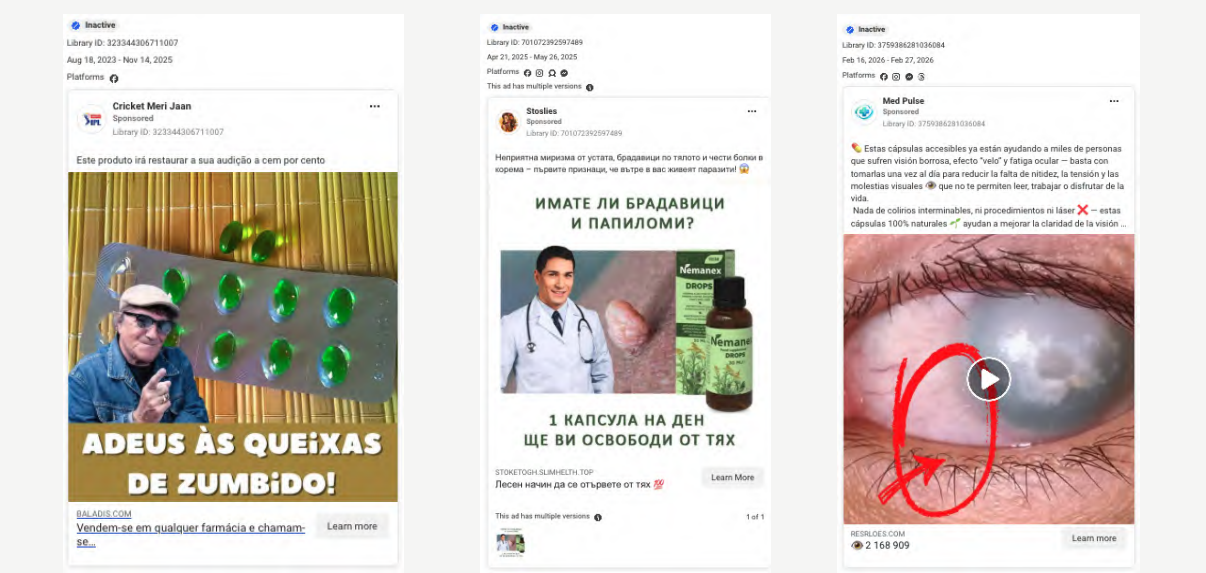

Figure 8: Advertisements with medical claims to treat various conditions: "This product will restore your hearing to 100%" (Portuguese, promoting the product "Oriton"); "One capsule per day eliminates warts" (Bulgarian, promoting the product "Nemanex"); "Thousands of people tested these eyedrops, which help improve vision clarity in a few days" (Spanish, promoting the product "Ocuvit"). (Source: Meta's Ad Library 1, 2, 3)

Coordinated Catchphrases Across Languages

Many ads include identical catchphrases, translated across different languages. One salient example is the slogan “Why are the pharmacies silent?”, which appears in at least 3,000 ads across all EU languages. Ads with this slogan and its variations (e.g., "Why is nobody talking about this?" or "The doctors are hiding this") have been running continuously throughout the entire period of analysis between 2023 and 2026.

Identical phrases are used for promoting specific products or treatments across languages: for example, 305 ads in six EU languages start with the phrase “Hemorrhoids will disappear forever if you stop eating these foods!", accumulating a total reach of 2.9 million. We identified over 15 catchphrases promoting treatment methods, which were used in ads across multiple EU languages, addressing conditions such as varicose veins, urinary incontinence, diabetes, eye inflammation, blood pressure, and skin problems.

The advertisers use identical text structures across languages even if they promote different products: for example, many ads start with the name and title of a medical professional, typically a cardiologist, urologist, or general practitioner, followed by a short quote presenting the promoted product or treatment as a simple alternative to conventional medical care. The quoted professional typically frames pharmaceutical treatments as unnecessary or wasteful, positioning a product or home cure remedy as a superior solution.

The repetitive use and identical structure of these catchphrases indicate coordination and centralized production of campaign materials.

Emotional Manipulation, Conspiracies, and Clickbait

The advertising relies heavily on emotionally manipulative content designed to trigger fear, anxiety, false hopes, a sense of urgency, desperation, or disgust related to health problems and push audiences to seek alternative treatment. Many ads rotate on the promises of “miraculous” cures or cheap home remedies to exploit psychological vulnerabilities. Others use graphic imagery to illustrate the consequences of leaving conditions untreated—images of bodies ravaged by parasites, or of limbs lost to unmanaged diabetes—before presenting a supplement as the solution. Others make conspiratorial claims to present "hidden knowledge" of cures that doctors or pharmaceutical companies have deliberately kept from the public.

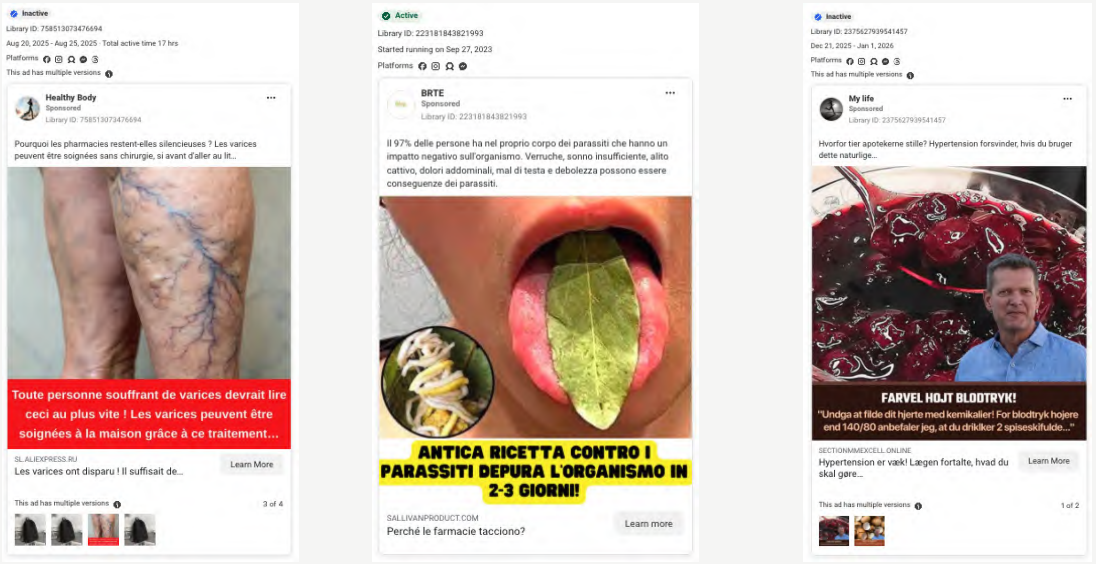

Figure 9: Examples of Danish, Italian, and French ads promoting conspiratorial narratives that pharmacies or doctors are concealing cures from the public. The ads use emotionally charged imagery and feature nearly identical copy, including the catchphrase “Why are the pharmacies silent?” translated across languages. (Source: Meta's Ad Library 1, 2, 3).

This content strategy is not incidental: research consistently shows that heightened emotional states impair truth discernment, making audiences less able to critically evaluate facts. This is particularly consequential in the health context, where acting on fabricated information carries real physical risk, especially for people who may have lived with chronic conditions for years and are open to trying alternative treatments.

The campaign uses clickbait to drive traffic to the landing pages selling the products. Phrases in ad copy next to call-to-action buttons are designed to get users interested in content that has little to do with the advertised treatments. For example, some ads mention the names or use the images of public figures to create sensationalist stories of "scandals" around them. Others promote personal stories of people suffering in hospitals. Others rely on bold statements such as “The urologists are astounded!” or “Nobody believes that this treatment works.”

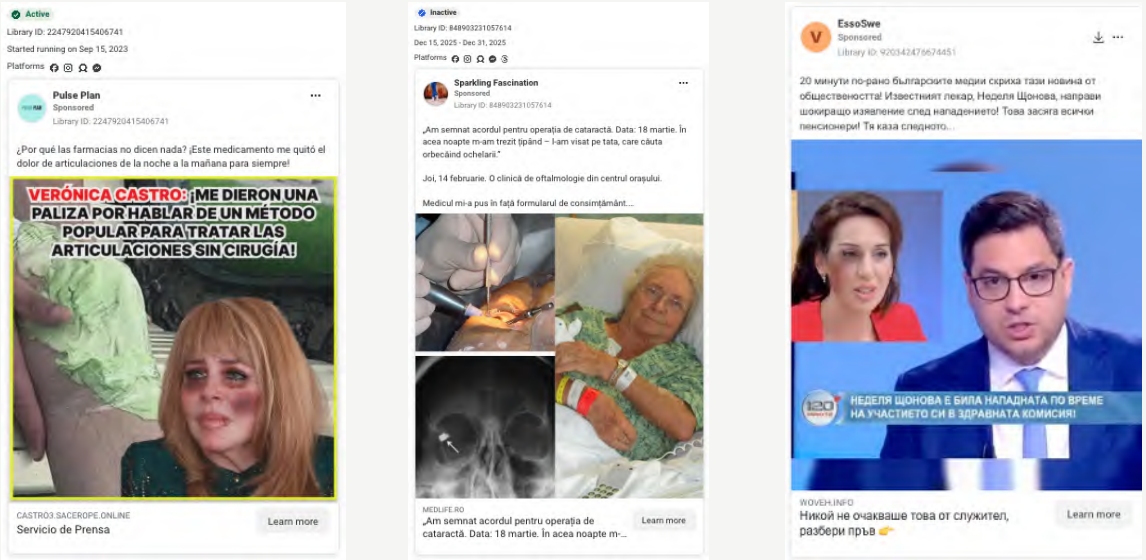

Figure 10: Examples of clickbait ads in Spanish, Romanian, and Bulgarian, including exaggerated stories about miraculous recoveries, shocking celebrity divorce announcements, fabricated reports of public figures caught in scandals or assaulted on air, and dramatic claims about someone suddenly needing urgent surgery. (Source: Meta's Ad Library 1, 2, 3)

Authority Hijacking and Impersonation

Many ads feature images or videos of public figures (celebrities, medical doctors, or journalists) to lend false credibility to the products and imply endorsement. Some individuals are referenced directly in the ad copy: we identified 350 names of public figures mentioned by name across the dataset. At least 230 of the identified impersonated individuals are renowned medical professionals with practices in European countries.

This figure is a significant undercount. Many ads impersonate individuals without explicitly naming them in the ad copy, for example, by using photos or videos without any references to their identity. This is particularly common with prominent medical doctors in the targeted countries, whose faces are recognizable to the local audiences, and with global celebrities whose faces alone are sufficient to imply legitimacy.

While some ads impersonate medical professionals as a clickbait tactic to promote home remedies and "natural" cures (e.g., a doctor suggesting herbal concoctions for joint pain), other images are directly manipulated for explicit product promotion ("cheapfakes"), with the doctors being depicted as holding or pointing at the product. Some ads use AI-generated deepfake videos to show footage of doctors promoting specific products or explaining alternative treatment methods.

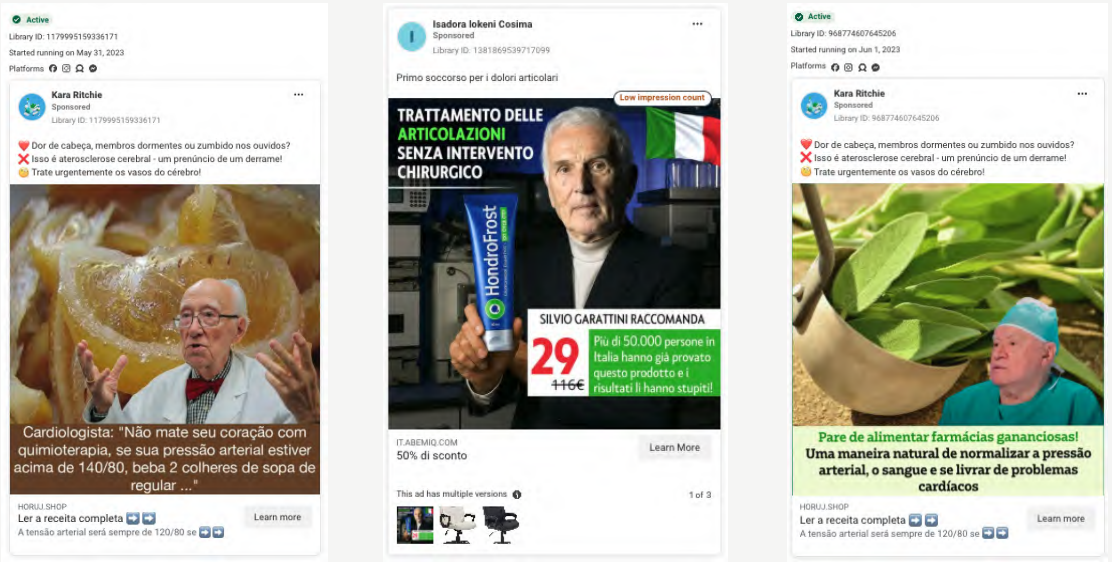

Figure 11: Examples of impersonation ads in Italian and Portuguese misusing images of legitimate medical professionals. The impersonated doctors are the Italian pharmacologist Silvio Garattini, the Russian cardiac surgeon Leo Bokeria, and the Portuguese cardiologist Fernando Pádua. Note that their names do not always appear in the ad copy, making it impossible to identify all impersonated individuals unless images are manually reviewed and reverse image searched. (Source: Meta's Ad Library 1, 2, 3).

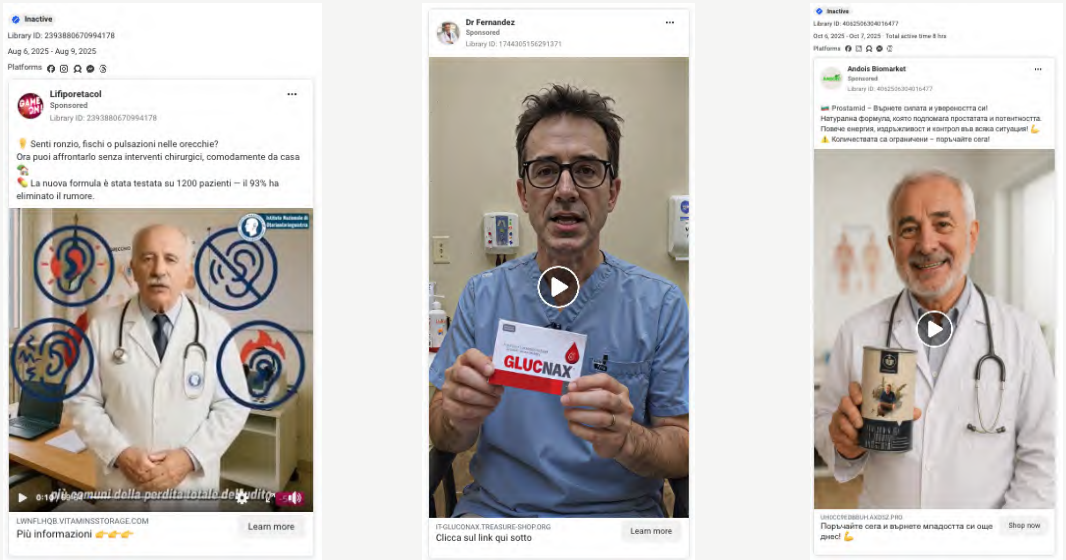

Figure 12: Examples of ads in Bulgarian and Italian featuring deepfake videos with footage of unidentified medical doctors or AI-generated medical personas. (Source: Meta's Ad Library 1, 2, 3).

The campaign also relies on images of local nationally recognizable celebrities when targeting specific European countries. For example, ads in Spain feature photos of singer Alejandro Sanz to falsely depict his recovery from diabetes. Italian audiences are targeted with diabetes-treatment ads featuring the actress Monica Bellucci or with joint pain remedies “tried and tested” by the pop icons Al Bano and Romina Power. Singers Eleonora Zouganeli (Greece) and Nina Badrić (Croatia) are featured in ads promoting weight loss products. Bulgarian hearing loss ads use images of musician Vasil Naydenov. We identified over 80 celebrities and public figures featured in these ads. The strategy to target audiences with ads showing local celebrities aims to build trust through cultural familiarity and make the false medical claims significantly more persuasive.

The running of ads that "represent [the] image of a famous person and misleading tactics in order to bait people into engaging with an ad" goes against Meta's Advertising Guidelines, as outlined in its policies on unacceptable business practices.

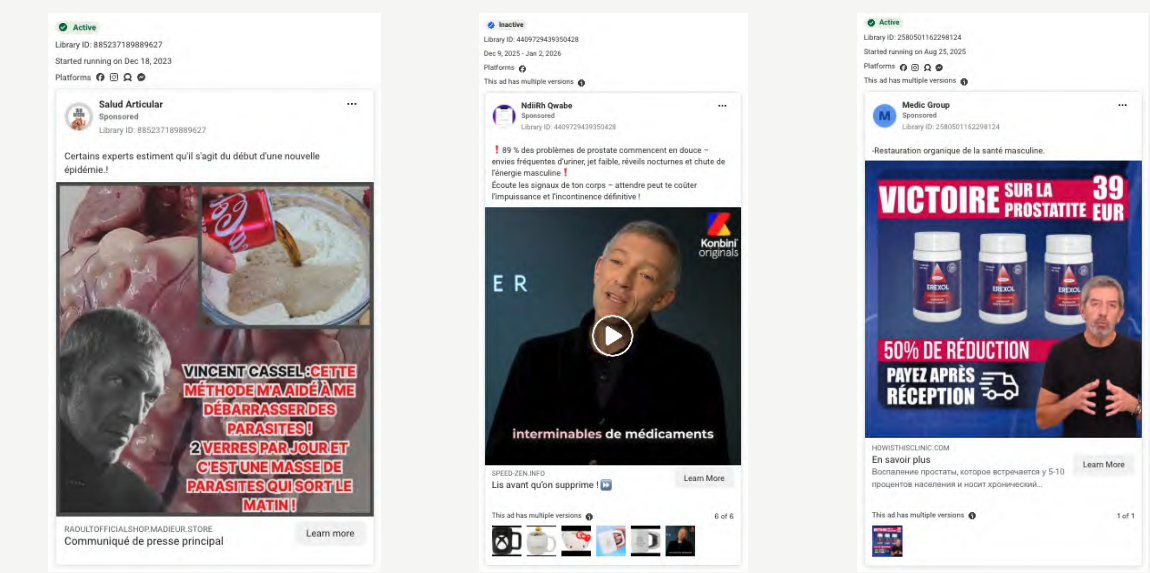

Figure 13: Examples of ads in French impersonating celebrities, such as French actor Vincent Cassel or French TV presenter and medical doctor Michel Cyms talking about miraculous treatments or directly promoting the nutraceuticals. (Source: Meta's Ad Library (1, 2, 3).

Trademark Infringements and Brand Spoofing

Thousands of Facebook ads misuse the logos of the pharmaceutical companies Bayer or Pfizer to imply legitimacy of the products. These ads can be collected on Meta's Ad Library by searching for the company names as keywords, because the logos displayed in the ad images are readable and therefore indexed by Meta’s search system. However, keyword-based searches also yield a large number of false positives. We manually reviewed and identified a

sample of 5,400 ads pertaining to the campaign and misusing the logos of these companies. Most of the ads promote male health products and feature explicit imagery, including nudity and pornographic content, displayed alongside the Bayer logo. Although some ads have been removed for violating Meta's policies, many remain active on the platform.

Likely, the number of ads is bigger than what we collected. Fraudulent medical ads with the logos of the two companies have been running for years, so we can consider this a solidified tactic used consistently to lend credibility to the products. The tactic constitutes clear trademark infringement in violation of Meta's own policies, and such ads can be reported to the platform.

Brand spoofing or impersonation is often used in scam campaigns to exploit brand trust and authority. In the context of this advertising campaign, it is particularly effective because consumers reasonably associate brands such as Bayer or Pfizer with rigorous clinical testing and regulatory oversight. The mere presence of a familiar pharmaceutical logo can be enough to lower skepticism in the promoted products.

Some ads are misusing the logos of other legitimate organizations, companies, and even health regulators. One striking example of multi-layered brand impersonation involves an advertising page with the username "European Medicines Agency," which launched a series of ads in 2025. Some of these ads incorporated the logo of the Italian Medicines Agency (AIFA) in the ad image to promote a hearing-loss product called Sonixine.

Using logos of medical entities is a common tactic across multiple advertising campaigns promoting nutraceuticals and is not limited to the products from our list. One recent example was a series of 15 ads launched in February 2025 promoting "Viagra" to Polish audiences with an ad featuring the logos of Pfizer, the US FDA, and the EMA.

All these campaigns fall under Meta's policies for unacceptable business practices. Meta offers a Brand Rights Protection tool that allows brands to identify and report content, pages, groups, and ads that infringe trademarks, clearly stating that such ads may be rejected "after being reported to us by an intellectual property rights holder or because there are signs that the ad may infringe the rights of a third party." However, the fraudulent advertising activity in the health sector continues to consistently exploit the brand identity of legitimate entities.

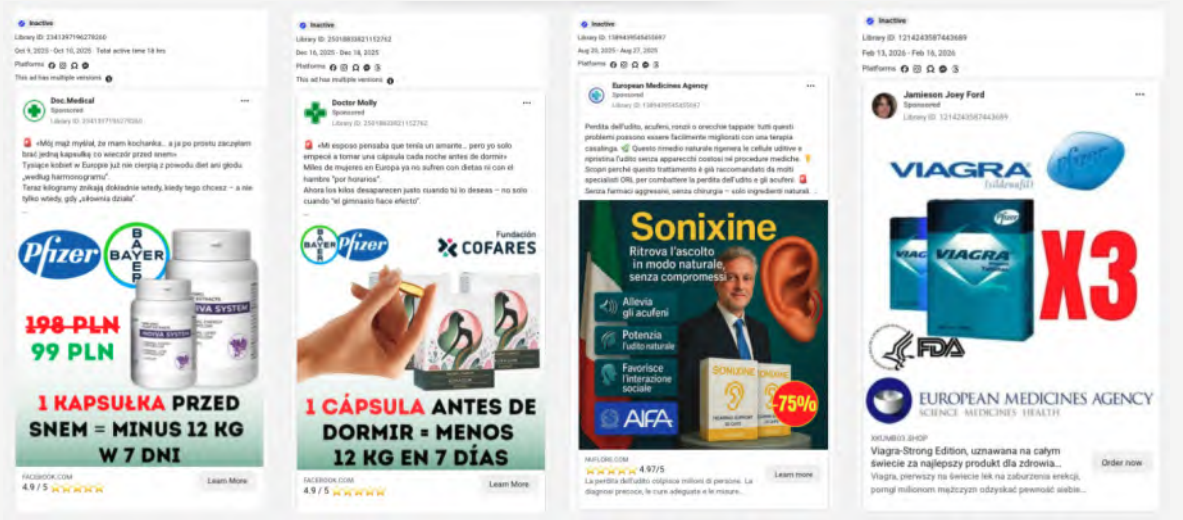

Figure 14: Campaign advertisements in Spanish, Czech, and Italian promoting nutraceuticals from our list with ad images featuring the logos of the pharmaceutical companies Bayer and Pfizer, Spain's pharmaceutical distribution cooperative Cofares, and Italy's health regulator AIFA. The ad on the right promotes a product packaged as "Viagra," which is not in our list of products, but the ad shares the same brand impersonation tactics, misusing the logos of Pfizer, the FDA, and the EMA. (Source: Meta's Ad Library 1, 2, 3, 4).

Enforcement still largely depends on rights holders enrolling in the program and actively submitting complaints or on Meta detecting some of these advertisers; however, our collection clearly shows that these measures do not dismantle the full scale of the campaigns. The only way the platform can disrupt these advertisers is by proactively scanning ad creatives for unauthorized use of logos, regulator names, and established brand identities, and suspending or removing ads that show clear signs of impersonation.

Bodyshaming and Negative Self-Perception Ads

Our list of nutraceuticals contains a range of skincare and weight-loss products. Many of these ads feature imagery that directly conflicts with Meta's Health and Wellness advertising policies. This includes visuals that "attempt to generate negative self-perception," compare body types while promoting an "ideal" standard (such as before-and-after weight loss images), or use close-up shots of "specific body areas by pinching fat." We have documented examples of ad creatives that fall into each of these described categories.

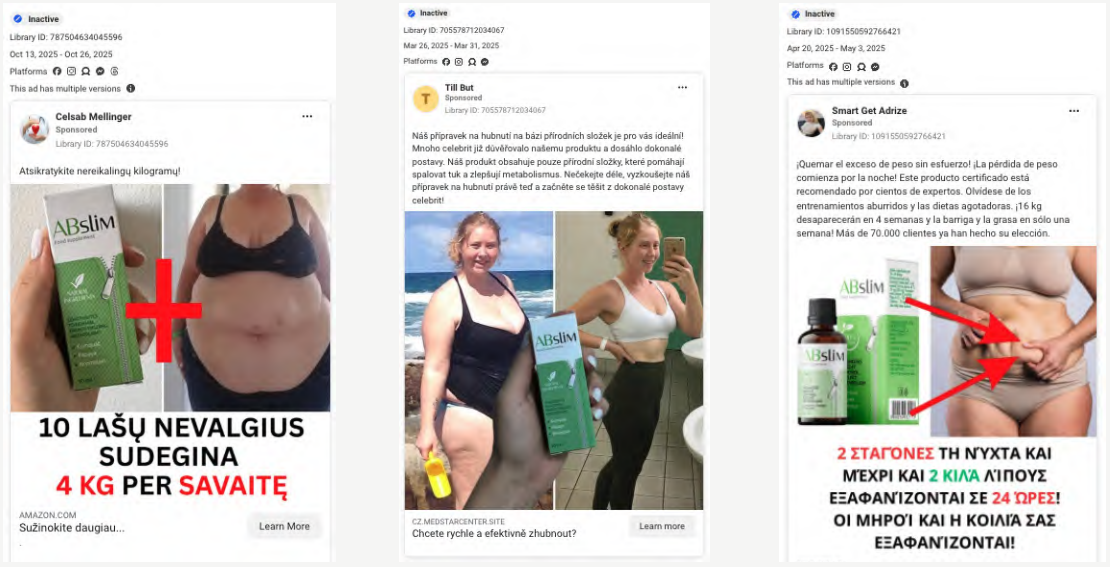

Figure 15: Campaign advertisements in Lithuanian, Czech, and Spanish/Greek promoting ABslim, an FDA-banned product for weight loss, with body-shaming images that violate Meta's policies. (Source: Meta's Ad Library 1, 2, 3)

Adult Content and Porn Ads

Ads promoting products related to male sexual health and the treatment of prostatitis systemically run images and videos using pornographic material. This paid content is running on Meta's platforms despite being in breach of the company's advertising policies. Throughout the years, these advertising campaigns have consistently been flagged by researchers. For example, in January 2025, AI Forensics published a report based on a sample of 3,000 ads containing images of adult nudity and sexual activities. Many of these ads were running promotions for male sexual health products from our core list of products.

Similar ads have run throughout 2025 and continue to run up to the present. More than 20 percent of the advertised products in our list of 390 nutraceuticals are related to male sexual health and prostatitis, and many of these products are promoted using pornographic imagery.

In March 2026, we collected 8,000 ads that ran with audiovisual pornographic content or images of adult nudity or human genitalia. These ads promoted 54 products from our list. Our analysis shows inconsistent removal of such content by Facebook. Not only are the ads approved by Facebook's content moderation, but some ads are allowed to run for days or even weeks without being removed.

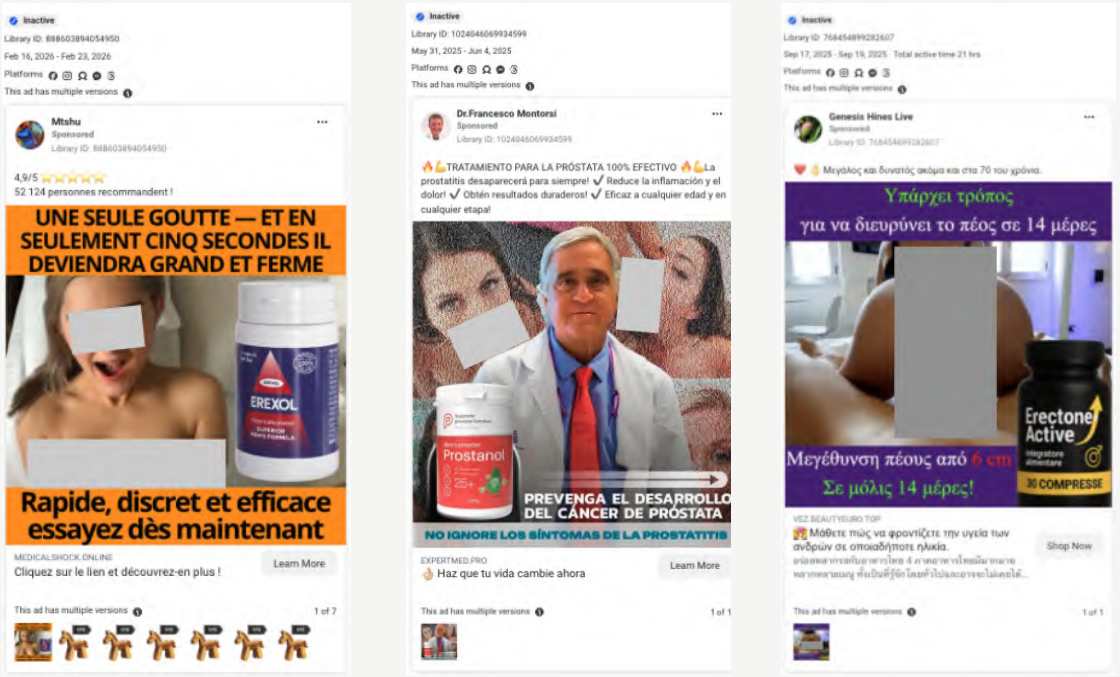

Figure 16: Campaign advertisements in French, Spanish, and Greek promoting pornographic content and products for male sexual health and prostatitis, such as Erexol or Prostanol, with one ad claiming that the product prevents prostate cancer. These ads have been running for almost a week (February 16–22, 2026) without being removed by Meta for violating the platform's policies on adult content and nudity. (Source: Meta's Ad Library 1, 2, 3)

Rise of AI-Generated Ad Creatives

Since 2025, these campaigns' advertising activities have increasingly shifted toward promoting AI-generated content. This was not characteristic of their earlier phases. The content includes emotionally disturbing images showing amputations, wounds, and physical illness. A number of ads include AI-generated videos featuring fabricated news-style footage in which TV anchors appear to present research about specific products. The campaign also increasingly uses deepfake videos impersonating medical professionals or fictional synthetic personas presented as doctors to endorse the products.

Generative AI tools also help advertisers create more professional-looking visuals that add credibility to the products. For example, we observed a shift toward AI-generated images depicting people holding the products, with polished promotional layouts that resemble professionally designed advertisements.

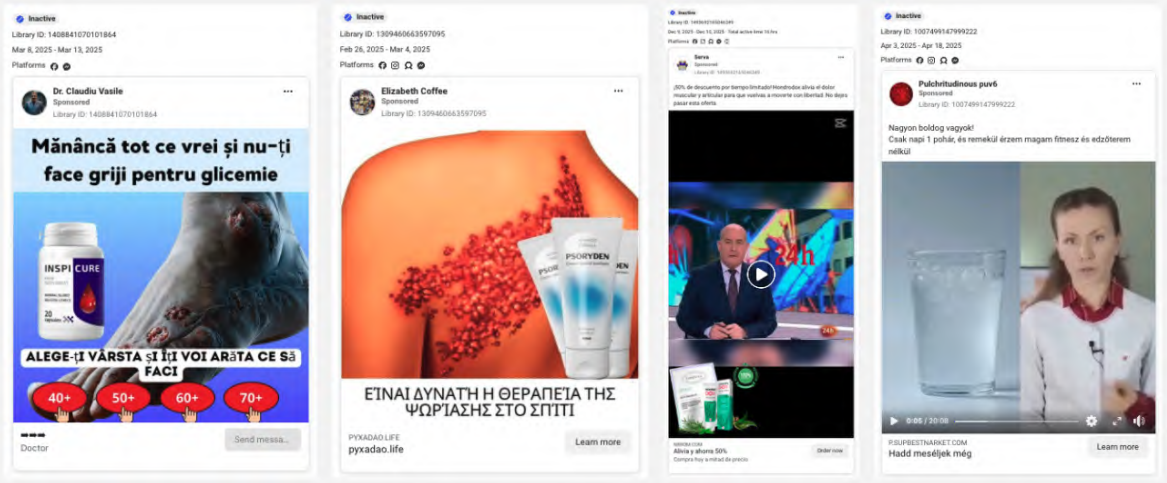

Figure 17: Images and videos created with generative AI tools. The ads in Romanian and Greek (left) promote graphic imagery showing the results of untreated diabetes and psoriasis. The ads in Spanish and Hungarian promote deepfake videos showing TV moderators or medical doctors as promoting the products. (Source: Meta's Ad Library 1, 2, 3, 4).

Figure 18: Professional-looking images created with generative AI tools. The ads in Greek, Spanish, Romanian, and Portuguese use unfounded medical claims such as "You will be free from diabetes in 30 days," and promote DiaFlex, a product flagged as dangerous in March 2025 by Germany's National Consumer Organization. (Source: Meta's Ad Library 1, 2, 3, 4)

Ad Cloaking and Keyword Obfuscation Tactics

Compared to earlier phases of the advertising activities (2023–2024), we noticed that Meta is increasing its efforts to remove specific content, especially ads directly mentioning diseases or product names. As a result, the advertisers have started to deploy various obfuscation tactics to hide or minimize content that can potentially trigger automated detection by the platform or result in removal after ad approval. Below, we outline several of the most common tactics observed at both the ad creative level and the landing-page level.

One recurrent tactic is the use of Meta's flexible ad format to showcase multiple images in one ad unit. Each image contains its own headline, image, call to action, and outbound link. In the context of the campaign, these ads are often multilingual, with individual images and ad copy in different languages, although the ad set as a whole targets audiences corresponding to the language promoting the nutraceutical. Most images feature neutral, non-health-related content (e.g., furniture, clothing, or food products) and link to vending websites such as Amazon. Only one image features the medical product and links to the corresponding landing page. This promotional ad creative is frequently placed last in the sequence, sometimes preceded by up to nine neutral images. The purpose is to reduce the likelihood that the problematic content is detected during automated or manual ad review. Many ads featuring sexually explicit images or other disturbing graphic content use these multi-image ad formats to hide the problematic creatives.

Another tactic used to hide the products from ad review involves embedding them as small graphic elements within otherwise neutral images with high virality potential, such as photos of landscapes or cute animals. In these cases, the product appears only as a minor visual component within a larger, unrelated image, making it less immediately noticeable. Advertisers also employ keyword obfuscation techniques such as the use of Unicode characters in ad copy.

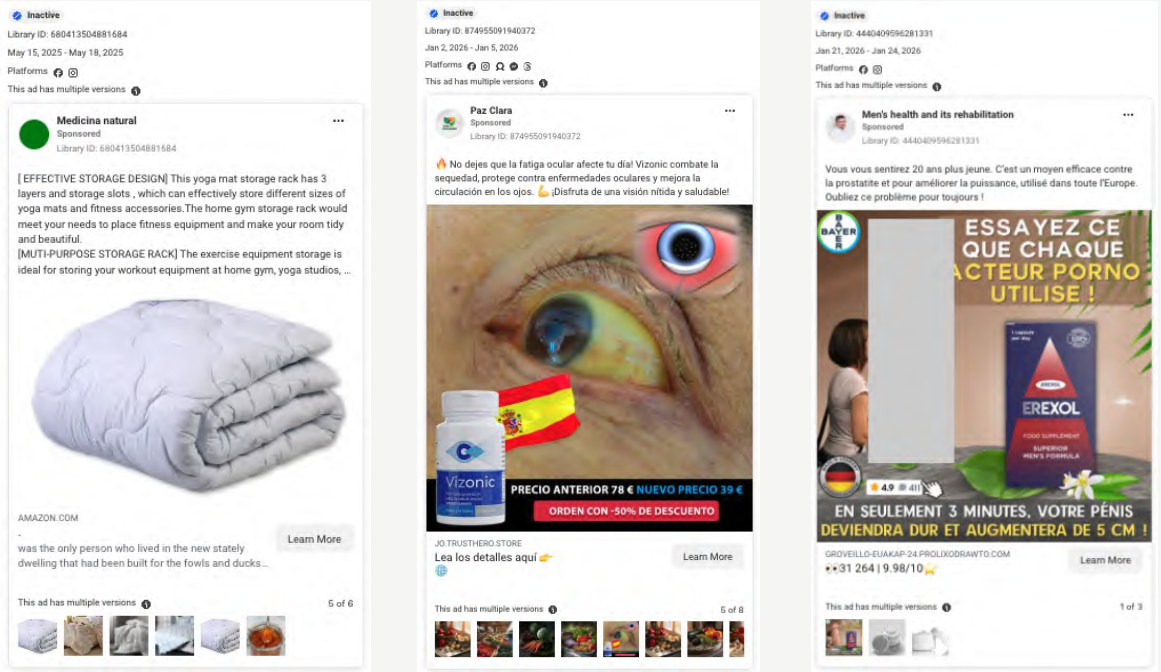

Figure 19: Ad cloaking with the flexible ad format. The first ad promotes the detoxification product Toxofil and targets Bulgarian audiences. The images preceding the ad promote health-unrelated products such as bedding sets in English and link to Amazon. The second ad targets Spanish audiences and uses a graphic close-up showing eye inflammation to promote the product Vizonic. The eight images preceding the ad contain visuals of food and link to Amazon. The third ad promotes Erexol, a product for erectile dysfunction, with the logo of Bayer and targets French audiences. The neutral images feature skin care ads in Hindi, linking to Amazon. (Source: Meta's Ad Library 1, 2, 3)

We observe active experimentation with modifying ad copy and creatives, particularly in how sensitive keywords are presented. For example, references to medical conditions such as diabetes are often featured in the ad image as text rather than stated directly in the ad copy. These variations appear to be part of a continuous testing strategy to assess which ads pass the review tests and which are eventually removed by the platform.

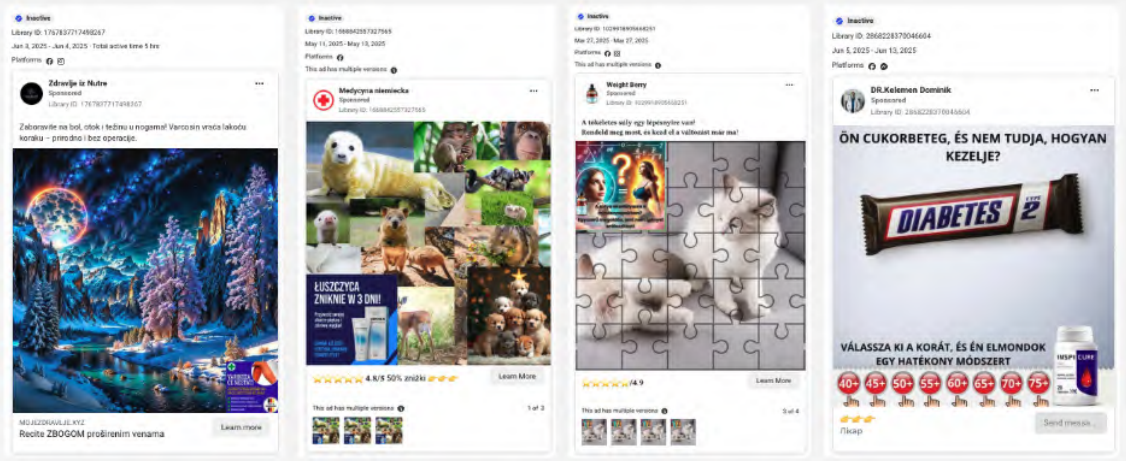

Figure 20: Visual experiments with minimized product placement to avoid detection, where the products appear as small images in neutral images. One of the ads uses Unicode characters to promote the weight-loss product Weight Berry with the phrase, in Hungarian, "The perfect weight is just one step away! Order now and start making a difference today." An ad that claims to treat diabetes with the product Inspicure features an image in which the word “diabetes” is styled using the Snickers brand logo. (Source: Meta's Ad Library 1, 2, 3, 4)

Another observed advertising tactic involves the use of rotating domains and multi-domain redirect funnels that route users through multiple URLs before directing them to a centralized landing page infrastructure. This tactic aims to minimize the risk of platform detection, enabling the campaign to remain active even if one of the domains is flagged or taken down. The infrastructure of landing pages will be examined in the second part of this investigation.

4.3. The Advertisers: Tactics and Policy Violations

The advertising campaigns are run via coordinated networks of burner accounts, or pages created for the purposes of running the ads only. These pages have no followers and little or no organic posting activity before running the ads, and many are being set up shortly before they begin to advertise.

We identified a total of 22,320 advertising pages that have run ads associated with this campaign between 2023 and 2026. Many of these pages display similar behavior and branding strategies, which allows us to categorize them as pertaining to "networks," or clusters of similar assets that are coordinatedly activated around this campaign. The repeated reactivation of the same networks to promote various products over time strongly suggests a consolidated advertising campaign. In the following sections, we outline the common characteristics of some of these advertisers.

Misleading Health-Branded Pages

Approximately 70 percent of the identified advertising pages use some form of medical or health-related branding. This manifests in various ways: some pages have usernames referencing medical organizations or institutions, while others relate to broader topics such as disease treatment, health, wellness, fitness, or nutrition. Some pages also include the names of real or fictitious medical doctors in their usernames.

The branding identity of the advertisers frequently incorporates health-related subjects in profile or cover photos. These visuals might include stock images of food, fitness, or medical symbols; stock photos of medical professionals; or AI-generated profile images. The pages often select page categories such as "Medical & Health," "Nutritionist," or "Health & Wellness Website."

While there are variations across individual pages, the consistent pattern is the use of misleading health-related branding to establish credibility before running their ads.

Impersonating Legitimate Organizations

Some advertising pages impersonate legitimate institutions, health authorities, or medical associations. Other pages present themselves as fabricated medical organizations. Some adopt mixed or inconsistent branding identities, blending the branding of multiple legitimate organizations or misusing and altering their official names.

Creating pages that impersonate legitimate entities goes directly against Meta's policies on Authentic Identity Representation, and therefore these assets should not be allowed to advertise. While Meta indeed removes some of these fraudulent advertisers, this frequently happens after they have run a considerable number of fraudulent ads.

For example, one page with the username “European Medicines Agency” ran 154 ads promoting products from our list between July and September 2025, before finally being disabled by Meta for not following the platform's advertising standards. At the time of writing this report, there are three active pages with the same username, “European Medicines Agency,” that have also run ads on nutraceutical products but have not been yet deplatformed.

Other advertising pages have impersonated entities such as the global non-government organization World Diabetes Foundation, the US magazine Men's Health, the US Journal of Urology, and the French newspaper Le Monde, among others. At least 10 legitimate entities, medical organizations, and media outlets have been impersonated by advertising pages running ads about nutraceutical products from our list. Various advertising pages identify as fictitious organizations, e.g., organizations that fight specific diseases or pages with usernames such as “Swiss Association for Women's Health” or "Austrian Association for Men's Health," which do not correspond to real entities but are used to lend apparent legitimacy to the advertising pages.

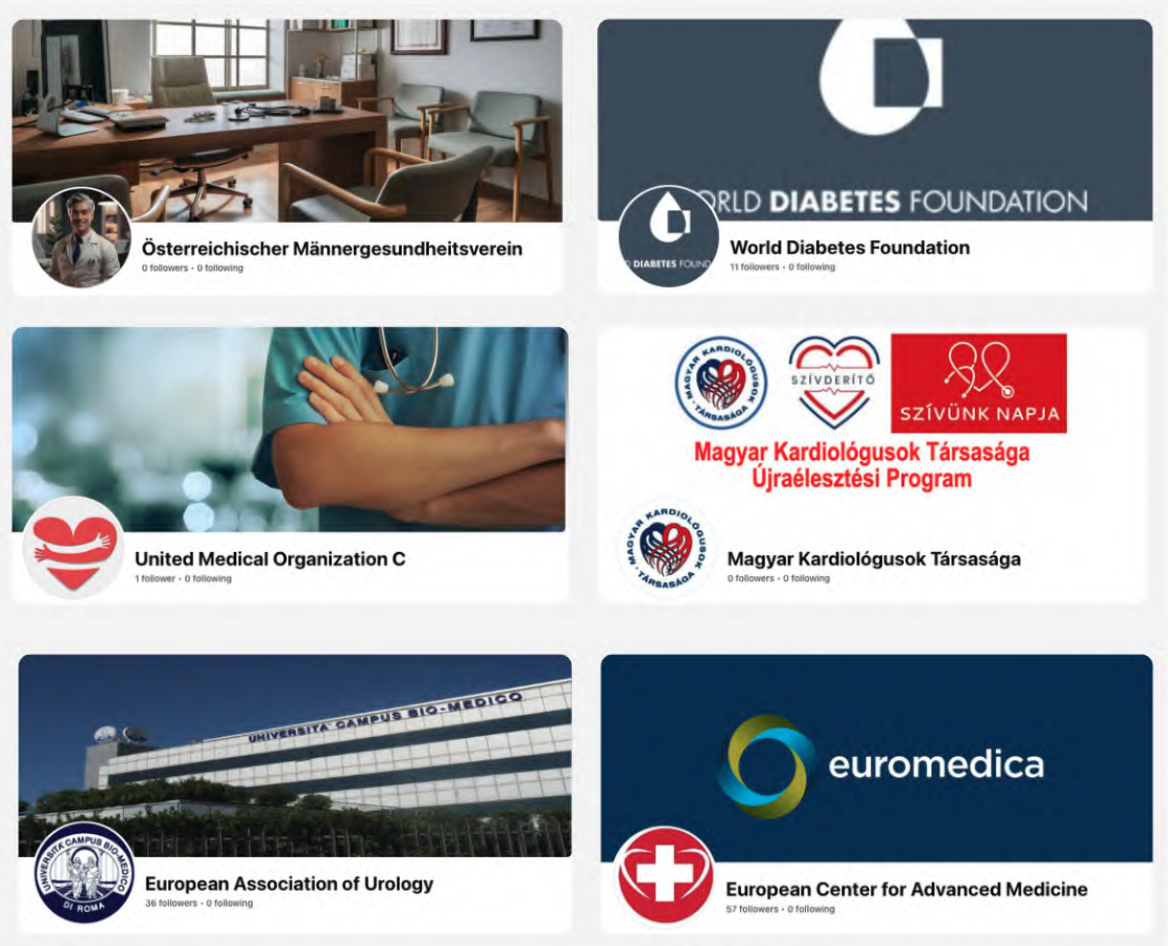

Figure 21: Health-branded advertising pages misusing the branding identity of legitimate medical entities and organizations (e.g., the World Diabetes Foundation and the Hungarian Society of Cardiology) or pages with invented branding posing as fictitious health-related organizations (e.g., "Austrian Organization for Men's Health"). (Source: Facebook 1, 2, 3, 4, 5, 6)

Impersonating Medical Professionals

Many pages use photographs of medical doctors as profile photos. Similar to the advertisements that feature photos of real doctors to promote magical home remedies or directly advertise the products, the profiles of these advertising pages feature stolen photos. We identified 20 impersonated doctors across various profile photos. This number is based on a reverse image search of the profile photos of a sample of advertising pages and represents only a small fraction of all misappropriated photos used by the advertisers. There is no coherent strategy as to which advertising pages impersonate which doctors: oftentimes the pages run ads in countries other than the country of origin of the impersonated medical professional.

Similar to the advertisers impersonating legitimate entities, pages impersonating individuals violate Meta's policies on Authentic Identity Representation, and as such should not be allowed to advertise.

In addition to misappropriating photos of real individuals, many advertising pages rely on stock images or AI-generated photos to portray fictitious medical professionals as part of their misleading health-related branding strategy.

Many pages strategically change their usernames before launching the ads to falsely imply medical affiliation. At least 1,480 advertising pages from the analyzed list have usernames that reference medical credentials or medical specialties (“Dr.,” “Prof.,” “MD,” "Urologist," etc.) and add fabricated names to accompany the titles.

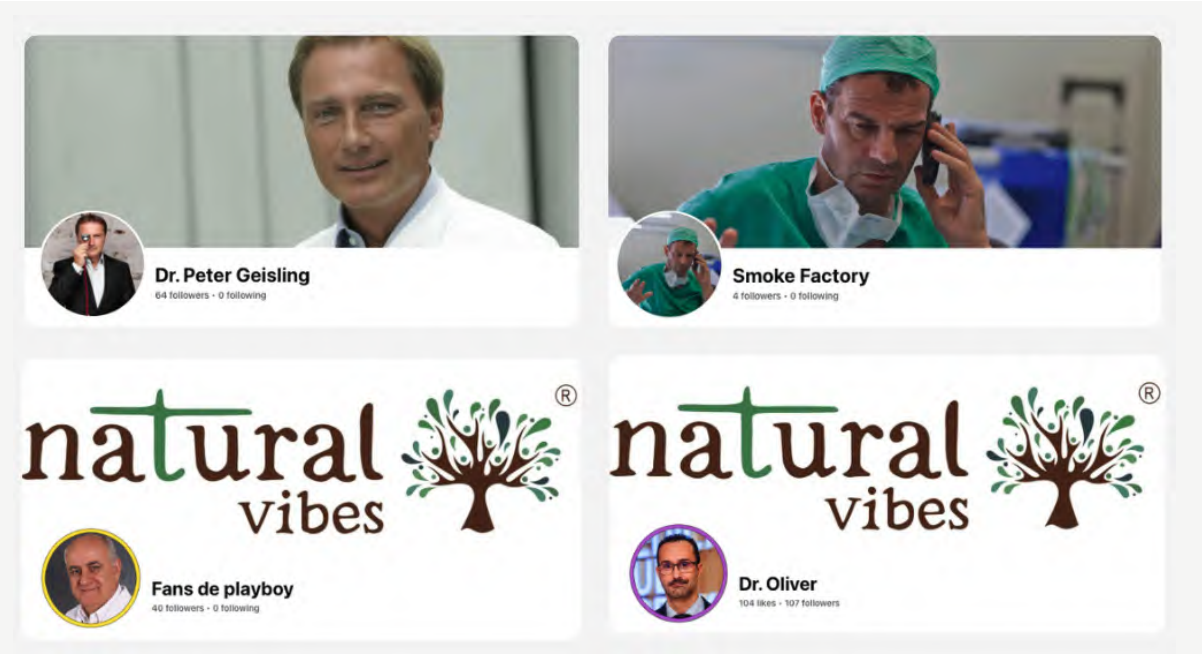

Figure 22: Examples of pages misleadingly branded with the photos of real medical doctors. A page with the username “Smoke Factory” impersonates Dr. René Prêtre (surgeon, Switzerland) to run ads targeting audiences in Poland and Czechia. A page with the username “Fans de playboy” uses the photo of Dr. Josep Brugada Terradellas (Spain) to run ads in Portuguese, Italian, and Spanish. A page with the username "Dr Oliver" impersonates the Spanish cardiologist Dr. Jose Maria Castellano Vazquez and runs ads in Hungarian. (Source: Facebook 1, 2, 3, 4)

Disease-Related Page Branding

Some pages adopt more-generic health-related branding, referencing specific diseases or medical conditions in their usernames and/or profile and cover photos. These pages often publish a few organic posts before launching the ads. Below are examples of four pages

branded around diabetes and pretending to be initiatives, blogs, or associations raising awareness about the disease. This disease-related branding is problematic because Meta explicitly prohibits advertising related to diabetes, and these pages use the branding strategically to create a sense of legitimacy for the promoted nutraceuticals.

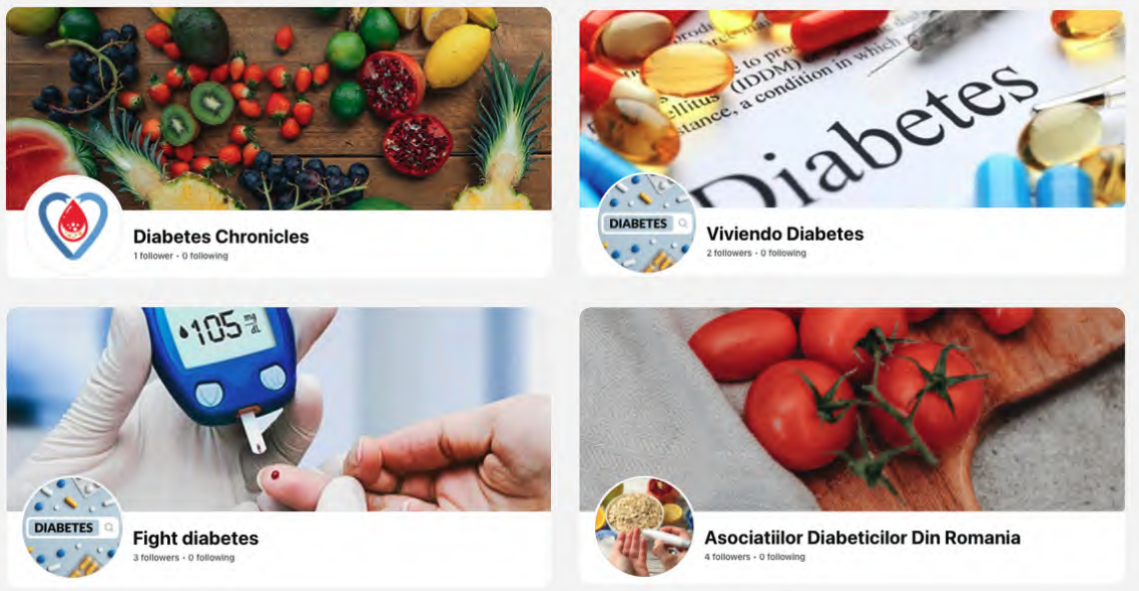

Figure 23: Diabetes-branded advertising pages. Two of the pages are operated by administrators based in Ukraine while being branded as associations or awareness-raising initiatives with names in Spanish and Romanian. (Source: Facebook 1, 2, 3, 4)

Coordinated Networks of Automatically Created Pages

The analyzed advertising pages exhibit clear signs of coordinated behavior, with a significant portion originating from networks of automatically generated assets. These advertising assets operate in direct violation of Meta's policy against CIB. Below are examples of coordinated networks identified within the dataset of analyzed pages.

Estonian-Based Network of Automated Pages

3,312 advertising pages (15 percent of the total) belong to one Estonian-based network of Facebook pages displaying clear markers of coordinated behavior. These pages all have similar usernames and feature near-identical information in their bios (Tallinn-based addresses and Estonian phone numbers). Although not all pages display the location of their administrators in their transparency section—mostly because Meta does not make this information publicly available for all pages—a significant portion of this network has administrators based in Estonia. All pages have usernames constructed according to a pattern: two rarely used or entirely

invented words are paired together to form nonsensical phrases in Italian or English. This results in peculiar and easily recognizable usernames such as "Ectogenic Pedaliaceae," "Echeggiato Recensisse," or "Mindful Malinstruction."

The visual branding of the network is also similar, with most pages using cover and profile photos featuring nature and landscape photography. Before being deployed in the advertising campaign, the pages typically publish several organic posts, likely as a “warm-up” strategy to appear legitimate and active and reduce the risk of being flagged or deplatformed by Facebook later on. These advertising assets were all created in 2024 and have been running ads throughout 2024 and in early 2025.

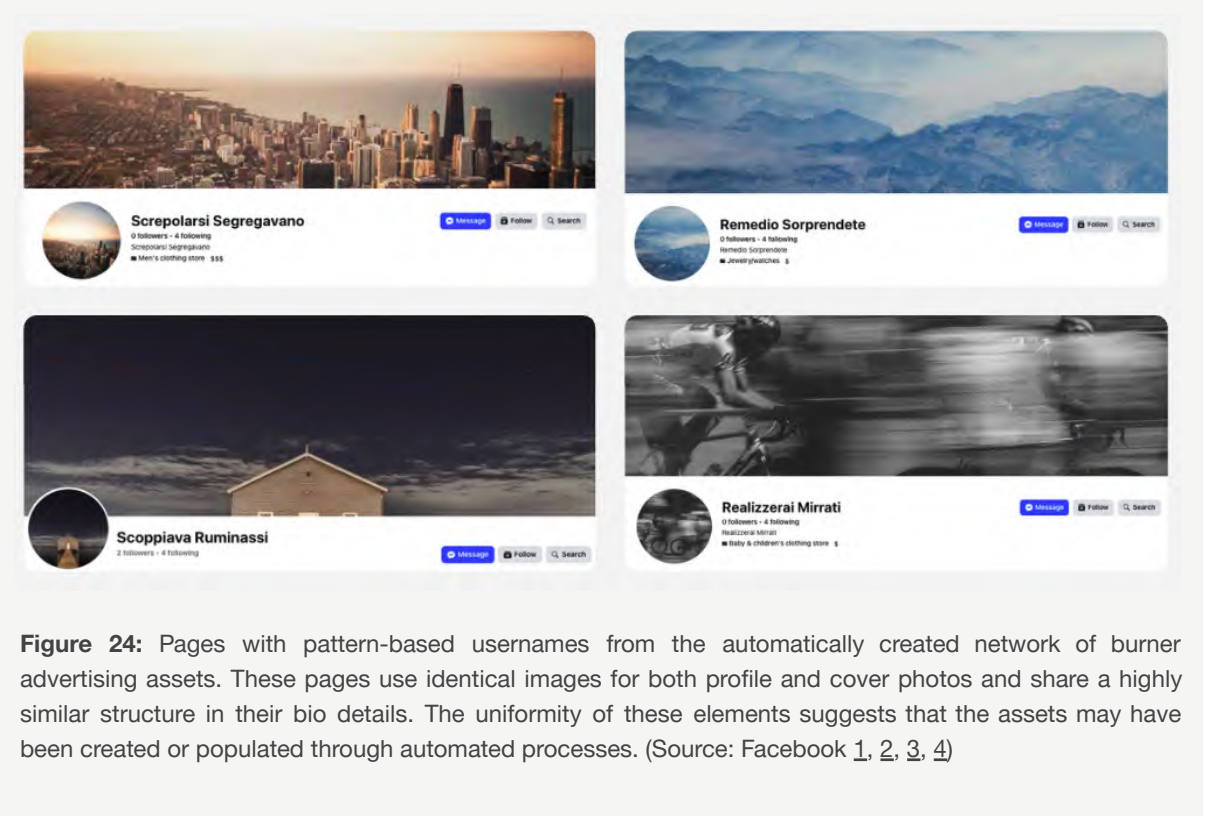

Figure 24: Pages with pattern-based usernames from the automatically created network of burner advertising assets. These pages use identical images for both profile and cover photos and share a highly similar structure in their bio details. The uniformity of these elements suggests that the assets may have been created or populated through automated processes. (Source: Facebook 1, 2, 3, 4)

The consistent username pattern, the uniform bio information, and the coordinated visual branding strongly suggest that these assets were automatically created and populated. Such assets can be launched at scale through automated account-creation scripts that draw information from wordlists and address databases, apply standardized bio templates, and upload cover and profile photos. Their iterative deployment throughout the campaign further indicates that they were conceptualized to function as disposable burner assets to launch ads. 99 percent of this network remains active as of March 2026 (3,289 pages), raising serious questions about Facebook’s ability to detect and remove automated networks.

Previously Detected Automated Networks

Many pages that have run ads linked to this campaign originate from other networks of automatically created assets previously investigated by Reset Tech. In 2025, we published a report documenting a shared ecosystem of 3.9 million pages pertaining to seven large-scale networks of automatically created assets. The pages from this ecosystem mostly remain inactive on the platform, with a small fraction being deployed as advertisers for specific campaigns. The advertising campaigns we investigated were linked to Russian influence operations targeting EU audiences (the “Doppelganger” operation), as well as to various scam campaigns, such as investment schemes or online gaming.

Pages from these previously investigated networks have also been consistent in advertising the nutraceutical products in our list, suggesting a shared ecosystem of advertising accounts active in Russian influence operations, scams, and nutraceutical advertising.

We identified over 1,200 pages running ads for nutraceuticals in our list that belong to previously investigated automated networks: the pages all share username patterns and brand identity characteristics of assets from the networks.

For example, 293 advertising pages belong to one network of over 242,000 pages, which we identified back in 2023. All pages from this network are constructed with usernames following the pattern “adjective + 2–3 letters + single digit,” and all have similar branding identity, which makes them easy to identify. Pages from this network have been active in numerous advertising campaigns, including the Kremlin's influence operation Doppelganger, and have consistently promoted nutraceuticals from our list. Over the course of three years, Facebook has not taken action to dismantle the network, which continues to operate and is launching ads using newly activated pages. 75 percent of the advertising pages from this network that ran ads on nutraceuticals are still active as of March 2026 (219 out of 293 pages).

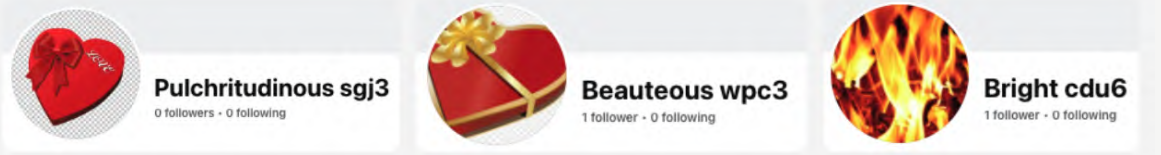

Figure 25: Advertising pages from one automated network that ran ads for nutraceuticals in our list. (Source: Facebook 1, 2, 3)

Another previously investigated automated network spanning 2 million dormant pages, all branded with profile photos of women and with usernames following the pattern “Noun/Verb + attributive noun + two-digit number" has provided 713 assets to run ads for nutraceuticals in

2024 and 2025. 50 percent of these advertisers are still active as of March 2026 (360 out of 713 pages).

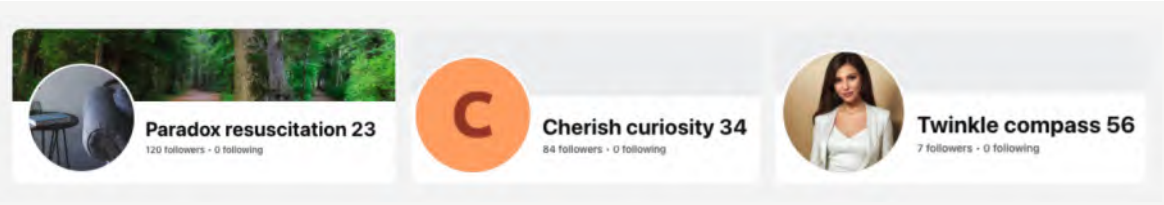

Figure 26: Advertising pages from one automated network that ran ads for nutraceuticals in our list. (Source: Facebook 1, 2, 3)

Other Automated Networks of Advertisers

We also uncovered new networks of pages that were activated in coordinated batches to run ads for the nutraceutical campaigns. These pages similarly exhibit consistent branding and username patterns, characterizing them as pertaining to larger networks of similar accounts. While we have not fully mapped the broader networks supplying advertiser assets for this campaign, our previous research indicates that such networks are typically very large, often comprising thousands of accounts, with only a fraction activated as advertisers at any given time. The clusters of pages running the ads show clear signs of coordination, with some being launched within a short timeframe and later replaced by accounts from other networks.

We identified more than 35 distinct groups of highly similar pages, activated simultaneously or in close succession to run nutraceutical ads. Below are some examples of coordinated pages from the identified groups. In some cases, the advertisers changed their profile photos to health-related images before launching ads, while other pages switched usernames to adopt medical-themed usernames before running their campaigns.

A group of 48 pages with usernames following the identical structure “Its + Noun” (e.g., “Its Napkin,” “Its Miracle,” and “Its Glow”) and profile photos featuring women and girls have been activated to run ads in 2025. Another cluster consists of 37 pages with usernames combining a Russian surname written in Cyrillic and a random number (e.g., “Попова3,” “Морозова1,” and “Новикова0”), paired with similar profile images of women and girls. A third group contains 10 pages whose usernames begin with “Health” followed by a two-digit number; these accounts use identical profile photos displaying a medical cross symbol. Another cluster of 70 pages all feature landscape profile and cover photos, short bio descriptions that are one-sentence variations of “Wish you a nice day,” and usernames constructed from two pairs of random English words.

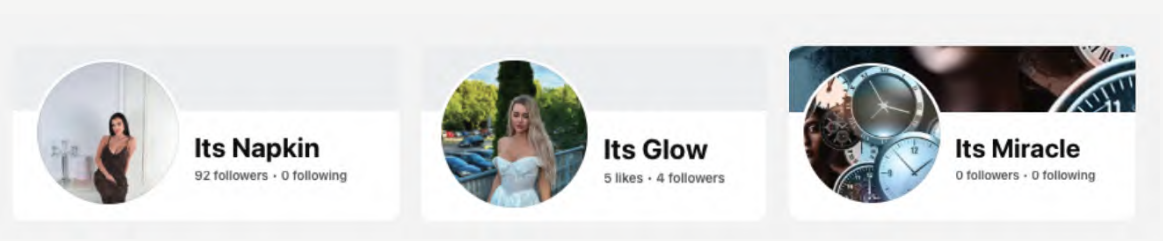

Figure 27: The "Its Napkin" cluster: 50 identical advertising pages were activated to promote nutraceuticals from our product lists in 2025. The pages follow the same username-building convention ("Its + Noun") and have profile photos of women. (Source: Facebook 1, 2, 3)

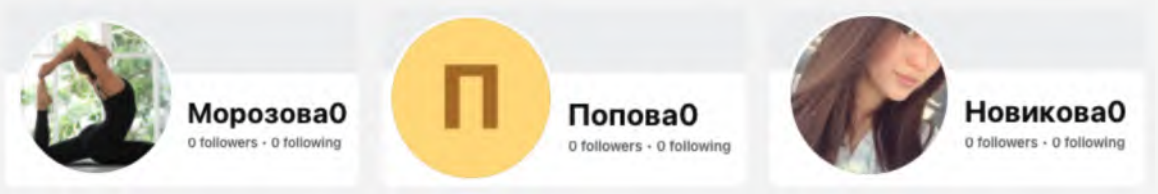

Figure 28: The "Russian female family name + zero" cluster: 37 identical advertising pages were activated to promote nutraceuticals from our product lists in 2025. The pages all have profile photos of women. (Source: Facebook 1, 2, 3)

Figure 29: The "Health22" cluster: 10 identical advertising pages were activated to promote nutraceuticals from our product lists in Q2 2024. The pages all use the same profile photo. (Source: Facebook 1, 2, 3)

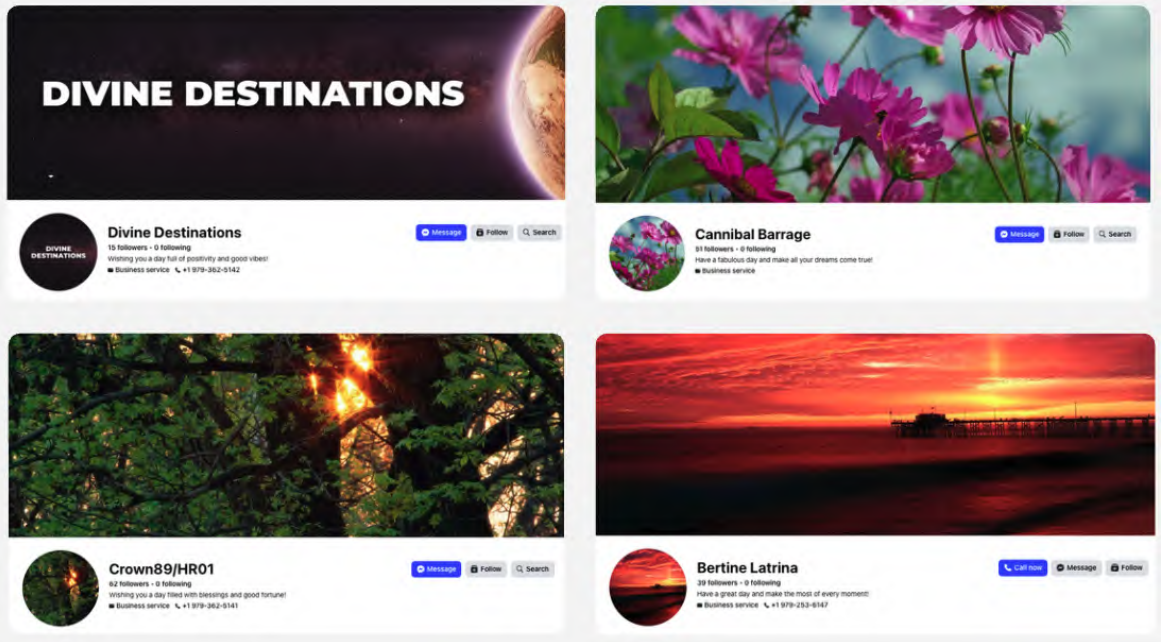

Figure 30: Four pages from the “Have a Great Day” cluster of automatically created advertising assets. These pages use identical images for both profile and cover photos; list bio details referencing Cambodia, Thailand, or Vietnam; and include generic well-wishes in their page descriptions, such as "Wishing you a day full of positivity and good vibes!" or "Wishing you a day filled with blessings and good fortune!" (Source: Facebook 1, 2, 3, 4)

The consistent activation of advertising pages belonging to coordinated and automatically created networks raises concerns about Facebook's responsibility to address inauthentic advertising, automated behavior, and deceptive service usage on its platforms, as required by the EU DSA. The activities of these advertisers across various campaigns, including political propaganda and health-related advertising, pose risks for the spread of deceptive or harmful content and the systemic manipulation of users.

A Dormant Network of Product-Branded Pages

About 1,800 advertising pages appear to have been created and branded specifically to promote the products, with usernames derived from the 390 products from our list (e.g., “Uro Up Forte,” “Testoy HR,” or “Femixal Magyarországon”). As of March 2026, 1,650 of these pages are listed as active advertisers in Meta’s Ad Library, meaning they are connected to Business Manager accounts and can be activated to launch ads at any time. Most of these pages have either never run ads or currently have no visible ads in their advertising profiles. Even if the pages are currently inactive, their explicit product branding shows they are advertising assets for nutraceutical campaigns.

Figure 31: Identical product-branded advertising pages with usernames featuring the product name "Femixal" and country abbreviations referring to campaign activities promoting Femixal in Slovenia, Czechia, and Slovakia. (Source: Facebook 1, 2, 3)

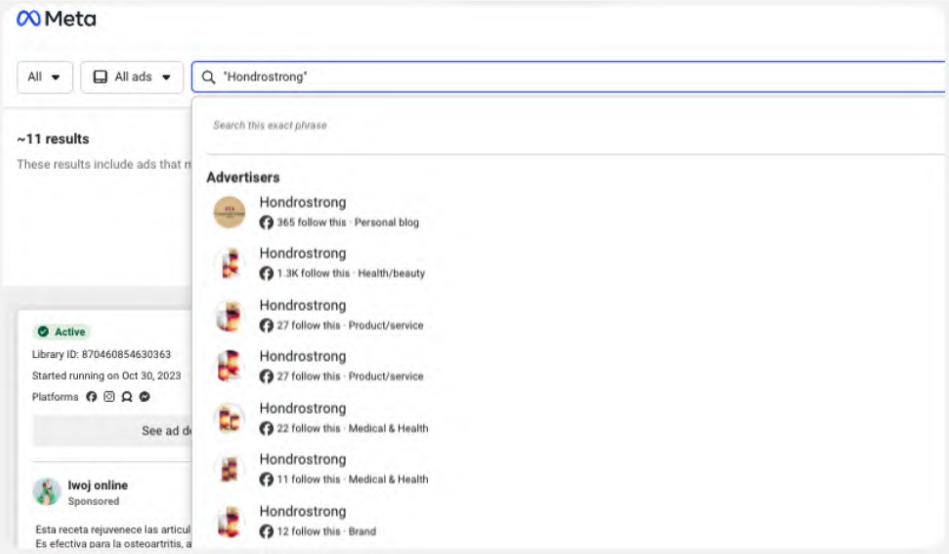

Figure 32: Discovering product-branded advertising pages on Meta's Ad Library. Typing the name of a product ("Hondrostrong") triggers a drop-down menu showing pages with usernames that exactly match the product name. (Source: Meta's Ad Library)

Expropriated and Repurposed Pages

83 advertising pages appear to have been hacked or otherwise expropriated from their original owners. The prior organic posting activity of these pages remains visible; sometimes their usernames are also not changed, indicating that they previously belonged to local businesses, companies, or individuals. These pages span a wide range of categories and locations, including restaurants, photo studios, car repair services, and personal blogs.

We identified some of their former owners. Several of the compromised pages were verified: one of these pages was the now-deleted official page of the Indian film Yaara (2020). Originally dedicated to promoting the movie, the page was repurposed for scam advertising in 2024. It

first used to run advertisements for investment scams before switching to nutraceutical and health-related products. The page's cover photo was changed to a healthcare-themed image on the day before running the nutraceutical ads, signaling its shift in purpose.

4.4. Facebook's Insufficient Action and Regulatory Shortfalls

Facebook's primary response has been to remove individual ads rather than address the campaign systematically. Content moderation also appears inconsistent, retroactive, and delayed. Some ads remain active for several days, while ads with identical copy or creatives are quickly removed for violating the platform's advertising standards.

Compared to our 2024 investigation, the platform has become more efficient in detecting and taking down violative ads, with a higher proportion now being taken down. As of March 2026, Facebook had removed 237,306 ads from the total collection of 350,548 ads (67 percent of all ads). The platform provides three types of notifications explaining the removal of ads, which are visible in the Ad Library interface. The majority of removed ads simply display the message "This ad is no longer available" (159,307 ads). Another 60,793 ads were removed because their associated pages were disabled; these ads display the message "This ad was run by an account or Page we later disabled for not following our Advertising Standards." A smaller sample of the ads were removed due to content violations of the platform's advertising policies (17,206 ads). These ads display the notice "This content was removed because it didn't follow our Advertising Standards."

Because of these inconsistent notifications, it is not possible to determine whether Facebook removed the majority of these campaigns for violating its advertising policies or whether the ads were simply taken down after their advertising budgets had been exhausted.

However, the advertising pages behind these ads are not systematically deplatformed. For the entire period of 2023–2026, Facebook deplatformed just 5,339 out of total 22,320 advertising pages for not following its advertising standards (24 percent). Networks of automated pages, such as the Estonian-based network of advertisers, remain active and could be reactivated for future campaigns. This suggests systemic gaps in enforcement and lack of oversight of problematic campaigns. Given that these advertising campaigns repeatedly violate multiple of the platform's own policies on advertising content, including rules on CIB, the pages engaging in such malpractices should not be permitted to run ads at all, especially not ads making prohibited medical claims or promoting dubious health products.

Facebook Removes Ads Instead of Advertisers and Still Leaves Many Ads Active
Share of ads in the analyzed sample (N = 350,548) that remain accessible versus removed, with a breakdown of Facebook's removal notifications for deleted ads.

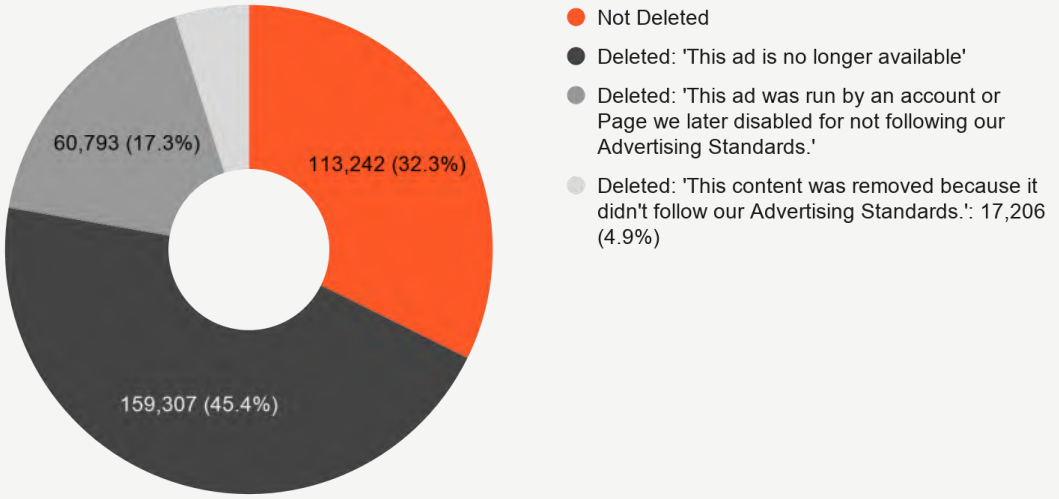

Figure 33: Chart showing the availability status of ads in Meta's Ad Library and the respective notification for removed ads. (Source: Meta's Ad Library)

We noticed several transparency concerns consistent with our previous investigations on advertising campaigns running on Meta's platforms. First, commercial ads are systematically removed from the advertiser's archive, making it impossible to keep track of the promoted content. Under the EU DSA, Meta must include advertisements in its ad repository until one year after it was last presented on its platforms (Article 39). Our data shows that many ads are removed from Meta's Ad Library well before the mandated one-year retention period. Of the 206,405 ads launched on the platform since March 2025, 45 percent are no longer available as of March 2026 (93,795 ads).

Second, Meta does not disclose ad budget data for commercial ads, including ads associated with this campaign. Given the campaign's cumulative reach, its continuity, and its high-risk profile, there is a clear public interest in transparency regarding the amounts spent on these advertisements targeting the EU.

Lastly, many of the ads run under fictitious beneficiary and payer names. Greater transparency is necessary to identify the companies or individuals who are ultimately responsible for paying for these campaigns.

Facebook is allowing this campaign to continue despite its other obligations under the DSA. Under Article 34, VLOPs are required to identify, analyze, and assess systemic risks to public health arising from advertising systems and content moderation. They must also put in place

effective mitigation tailored to those identified systemic risks, which can include speedy content removal, changes in their advertising systems, and cooperation with authorities (Articles 34 and 35). Although Meta is aware of the issue, it is only discussed briefly in its DSA Risk Assessment Reports, and the mitigation measures it has put in place so far have been insufficient, as demonstrated in this report. By allowing this high-volume advertising campaign to run for years, the platform falls short of these regulatory obligations, leaving EU users consistently exposed to health risks.

4.5. Recommendations for Risk Mitigation on Facebook

Our first recommendation is that Facebook and its parent company Meta shift from a predominantly retroactive approach to content moderation toward proactive monitoring of advertisements that pose a systemic risk to public health in the EU. Our collection of ads is based on keyword searches by product names in Meta's Ad Library. This method can easily be integrated into the platform's own routine monitoring systems for detection of problematic content. The proactive monitoring, identification, and removal of ads mentioning the names of these products is especially valid for the list of 76 nutraceuticals that have been labeled as dangerous and illegal by health regulators worldwide (see Appendix). Similarly, proactive monitoring of ads with creatives incorporating the logos of pharmaceutical companies and legitimate health institutions would surface a substantial volume of problematic advertisements.

Second, we recommend that Facebook deplatform advertising pages with usernames derived from the names of these nutraceuticals. There are currently 1,650 product-branded pages, which are linked to Business Manager accounts and can be found listed as advertisers in Meta's Ad Library. The proactive removal of these pages based on their brand identity alone, which already signals their primary purpose, would disrupt a part of the advertising ecosystem before more ads are launched.

Finally, our research has repeatedly shown that Facebook tends to remove individual ads for violating its policies while ignoring the pages running these ads. Deplatforming repeat offenders (pages that have launched multiple problematic ads), as well as disposable advertising assets that are part of automatically created networks launched with the sole intent to run ads, is the only way to effectively disrupt this campaign and prevent others. Given the overlap between multiple problematic advertising campaigns run by assets from the same automated networks, disrupting these networks will only protect consumers from future scams. Furthermore, implementing stricter rules on advertiser verification would impede malicious actors from activating such burner accounts.

5. The Advertising Campaigns on Google

Google appears to be a secondary platform for advertising activities around our list of products, with a significantly lower number of ads compared to Facebook. This could be the result of many factors, including advertisers' preference for Facebook for its versatile targeting options, Facebook's diverse elderly demographics, or Facebook's lower per-click cost compared to Google. However, we cannot verify that our collection of Google ads reflects the full scale of these campaigns on the platform. Due to limitations of Google's Ads Transparency Center, we were only able to retrieve advertisements promoting websites that explicitly feature the names of the nutraceuticals in our list. It is entirely possible that additional ads exist and promote the same products through unbranded or differently branded websites that do not explicitly reference the product names, and therefore could not be collected through our methodology.

5.1. Campaign Performance Overview and Key Figures

In total, we collected 2,073 Google ads launched between 2023 and 2026. These ads target mostly EU audiences, with Romania, Poland, Italy, Germany, Hungary, and Spain being the most often targeted countries. About 100 ads target non-EU countries such as Turkey and Norway, as well as Spanish-speaking countries in Latin America (Chile, Honduras, El Salvador, and Mexico). A few ads target audiences in Vietnam.

472 advertisers ran these ads. We also collected all other ads launched by the identified advertisers that were available on Google's Transparency Center at that time. This covered ads promoting other products, including nutraceuticals that were not in our list of 390 products. The expanded collection of relevant nutraceutical ads by these advertisers is 7,332. The second data-collection step was undertaken to demonstrate that the advertisers' portfolios extend beyond the products included in our list, encompassing numerous promotions for other nutraceuticals.

The ads promoting our core list of products predominantly run in text-based format (2,047 ads), followed by 26 video- and image-based ads. In total, the ads generated between 5.9 million and 8.3 million impressions, based on the lower and upper range estimates provided by Google. Although some ads from the campaign appear to have garnered impressions across all five possible ad placements on the platform—Shopping (product listing), YouTube (video ads), Maps (local listings), Play (app ads), and Search (text ads)—the highest number of impressions come from text-based Search ads.

Most Ads in the Analyzed Google Sample Were Launched in 2025
Number of ads launched on Google between 2023 and early 2026.

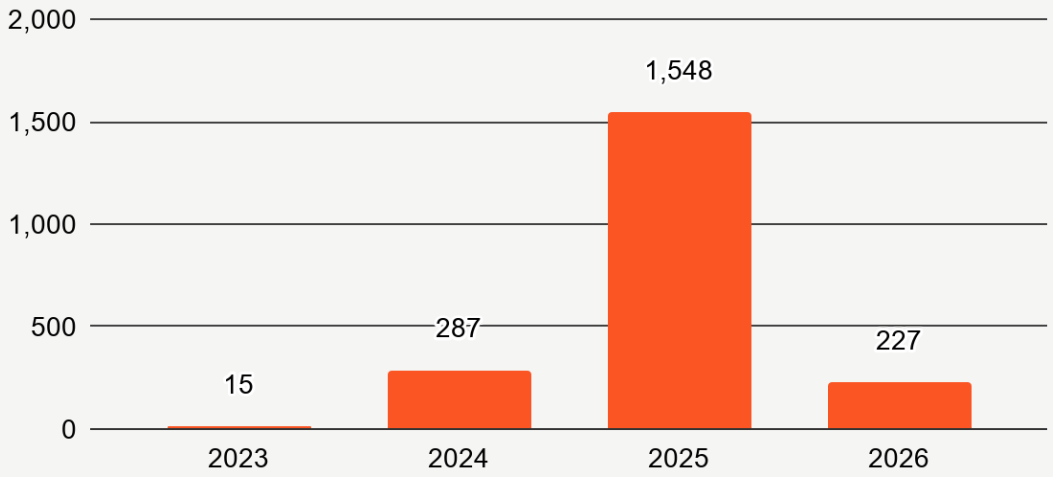

Figure 34: Bar chart displaying the number of ads in the sample launched per year (2023-2026). (Source: Google Ads Transparency Center)

5.2. The Ads: Content, Tactics, and Policy Violations

Compared to the advertising campaign on Facebook, the Google ads in our sample are more neutral and do not aggressively promote the products through impersonation, sensationalist stories, or bold promises for miracle cures.

Although some text-based ads include misleading medical claims about the efficiency of the products, most ads promote the websites selling the products with a short call-to-action copy aimed to drive website traffic. We identified very few video- or image-based ads, and most ad creatives do not appear to violate Google's advertising policies. Only a small number of ads promoting weight loss products included body-shaming imagery and before-and-after comparisons, which violate some of Google's policies on misrepresentation prohibiting advertisements making "misleading and unrealistic claims about weight loss."

One recurrent tactic for most of the text-based search ads is to use ad copy announcing big discounts (for example, advertising "50 percent off" and emphasizing that only a few items remain in stock). This messaging can be interpreted as creating an artificial sense of urgency designed to drive traffic to the websites and pressure users into making a purchase. This tactic extends beyond the ads themselves and is used consistently throughout the affiliate marketing funnel: nutraceutical products are continuously presented as discounted, and the corresponding landing pages are structured to highlight limited-time offers and reduced prices.

Such advertising practices raise concerns under Google's policies on misrepresentation, which clearly state that clickbait tactics, sensationalist text, and deceptive pricing tactics to drive traffic are not allowed on the platform.

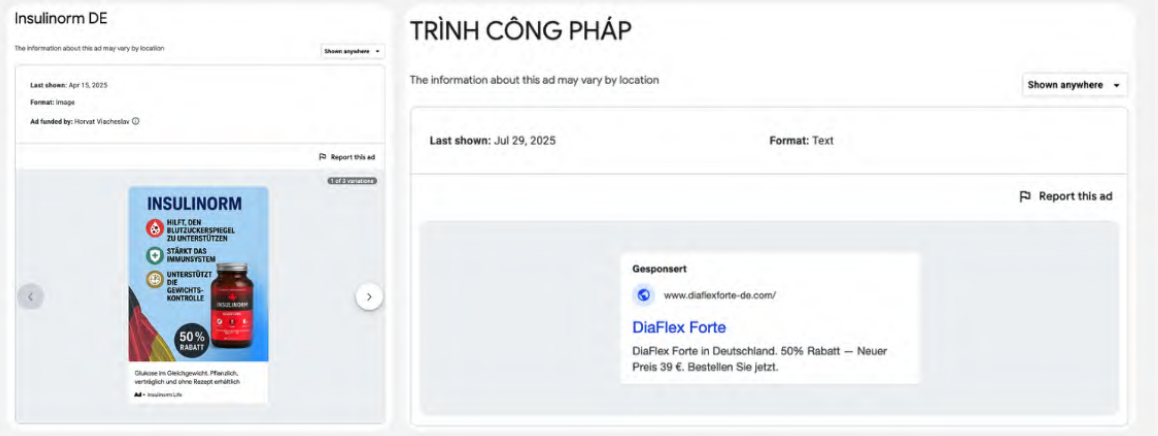

Figure 35: Search ads in German promoting "Diaflex Forte" and "Insulinorm," two products for diabetes and blood sugar, listed by the German National Consumer Advice Center as dangerous. The ads offer a 50 percent discount. (Source: Google Ads Transparency Center 1, 2)

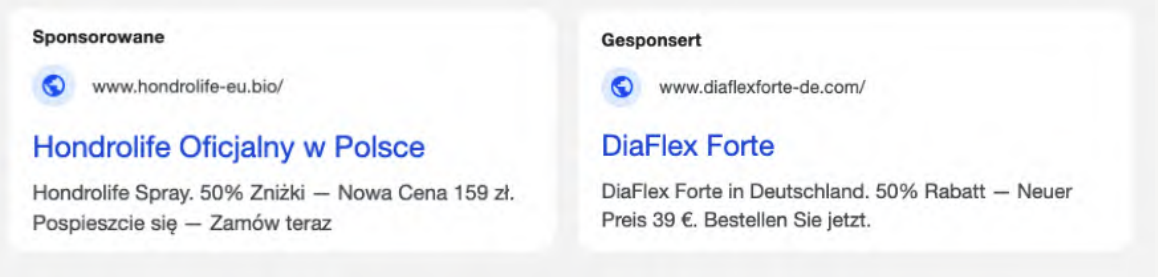

Figure 36: Manufacturing urgency: Search ads in Romanian and German announcing big discounts and limited availability of nutraceuticals. (Source: Google Ads Transparency Center 1, 2)

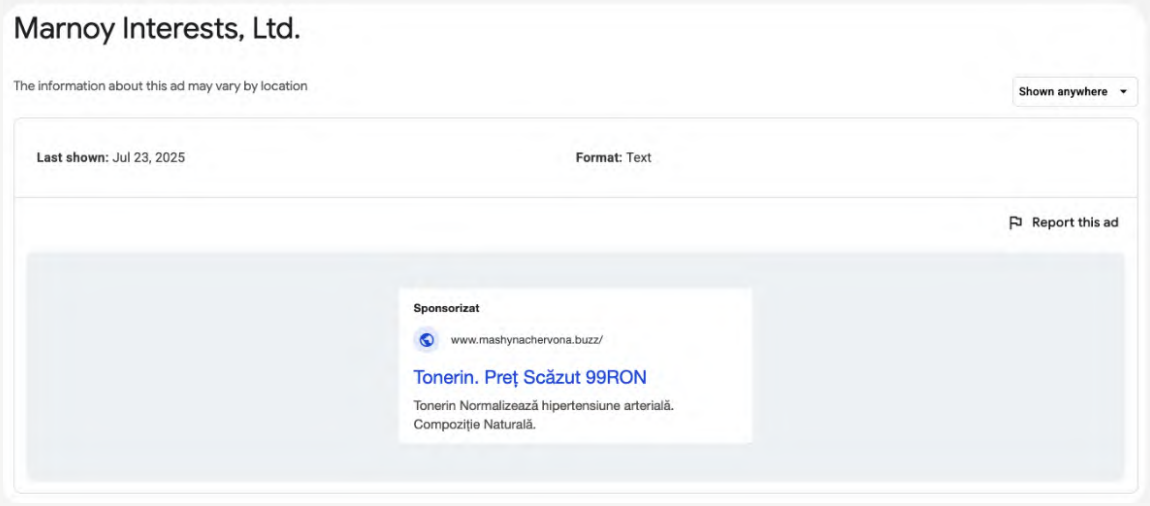

Figure 37: Ad with unfounded medical claim ("Tonerin normalizes blood pressure") in Romanian. The product Tonerin was flagged by the Slovenian Agency for Medicinal Products and Medical Devices (JAZMP) as dangerous in 2023. (Source: Google Ads Transparency Center 1)

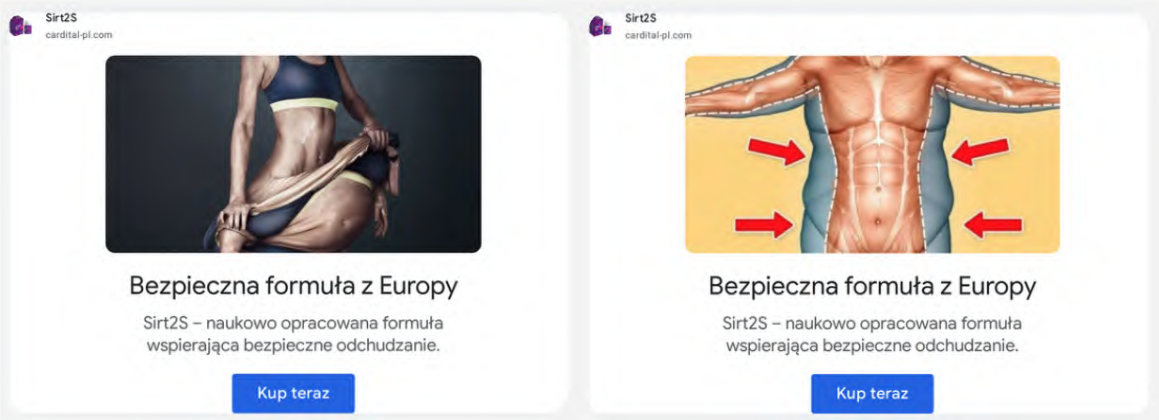

Figure 38: Body-shaming imagery in ads promoting weight loss targeting Polish audiences. The advertiser is from Ukraine. The ad itself links to a landing page promoting Cardital, a supplement for cardiovascular support. We spotted several mismatches between the promoted websites and the ad creatives. (Source: Google Ads Transparency Center 1, 2)

5.3. The Advertisers: Tactics and Policy Violations

Many advertisers run ads in breach of Google's healthcare-related advertising policies, which allow only legitimate entities or organizations (online pharmacies, pharmaceutical manufacturers, government, or healthcare advocacy groups, etc.) to advertise after applying

through a vetting process. Overall, 75 percent of the advertisers in our collection are individuals, with 350 advertisers displaying personal names rather than company names. These accounts are exclusively activated in batches to run a few ads before discontinuing the advertising activities, likely as a way to avoid detection by the platform.

80 percent of all advertisers running ads in the EU are individuals and companies based outside of the EU, with the biggest share of advertisers operating from Brazil (62 percent), followed by Vietnam (9 percent). Although Google allows advertisers from non-EU countries to run commercial ads in the EU, the platform is leaving the responsibility to the advertisers to follow the advertising rules in the respective EU countries, including for healthcare advertising. In the context of these campaigns, this lack of oversight creates systemic risks for public health.

Most Advertisers Running Ads in the EU Operate From Outside the Bloc

Only 20 percent of the advertisers are based in the EU.

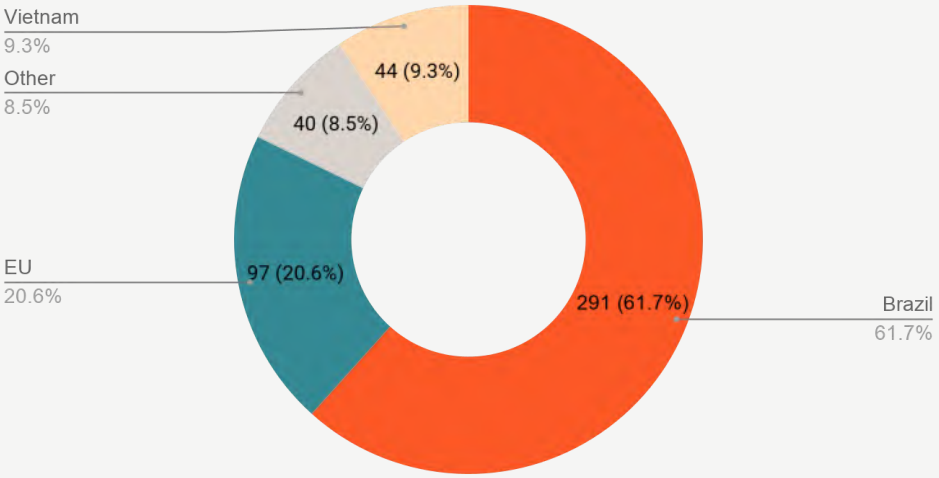

Figure 39: Chart showing Google advertisers by location. (Source: Google Ads Transparency Center)

The ads violate Google's policies about advertising of health products. The platform offers a "non-exhaustive list" of forbidden substances and supplements as well as a list of unapproved health substances, where it explicitly states that the promotion of content related to such products is prohibited. This list includes, among other things, "herbal and dietary supplements with active pharmaceutical or dangerous ingredients" and "products that have been subject to any government or regulatory action or warning." In total, 20 percent of the products from our list have been flagged as dangerous to consumers by official institutions and regulatory authorities, yet most of these products have been advertised for years. This indicates a persistent gap between Google's stated policies and their practical implementation, with compliance evidently reliant on advertisers' discretion rather than on platform enforcement.

In recent years, Google has been putting effort into the verification of all advertisers on the platform as part of their advertising transparency policies: 92 percent of the advertisers we discovered are verified. We cross-checked the identity of some of these companies and were able to verify actual entities operating in various countries. For example, some of the Brazil-based advertisers are registered as freelancers or one-person businesses, with some of their usernames featuring the local tax identification numbers (CNPJ numbers).

However, none of the advertisers we analyzed were registered as official pharmacies or authorized medical manufacturers. Instead, the nutraceuticals are promoted exclusively by individual freelancers or digital marketing agencies. Although these advertisers hold verified accounts, their promotion of health products may still contravene Google's policies. For instance, the platform explicitly prohibits "unauthorized pharmacies" from targeting regions where they are not licensed, reflecting the situation of non-EU advertisers marketing nutraceuticals to EU consumers.

5.4. Google's Insufficient Response and Regulatory Shortfalls

None of the advertisers in our list have been deactivated for violating the platform's advertising guidelines despite going against Google's policies on advertising "unapproved substances" and having promoted nutraceuticals flagged by official authorities as illegal or dangerous. We believe that Google is not acting based on a list of flagged medical products, and therefore is not taking steps to implement its own policies with regard to this campaign.

Although some advertisers and ads were removed, we were not able to identify explicit notifications by the platform that this content or advertiser had violated any of its advertising policies. Consequently, it remains unclear to what extent Google is aware of, or formally acknowledges, the underlying issue.

The campaign may constitute a systemic risk under the EU DSA, and Google is in potential violation of Articles 34 and 35 for not identifying and mitigating against systemic risks to public health in the EU. Google's risk assessment reports show that public health risks are only a minor concern, with only a few risks listed.

This investigation illustrates the lack of interoperability between ad repositories across platforms: while Meta's Ad Library allows looking by keywords to collect ads both programmatically via Meta's API and directly in the online interface, Google's Ads Transparency Center can only be queried by specific advertisers, ad IDs. or domain names. Even on BigQuery, users cannot search by keywords, which constrains exploratory analysis and leaves significant gaps in assessing the full scope and scale of advertising campaigns.

Similarly to Meta, Google does not provide data on ad budgets for commercial advertising. The absence of budget data significantly restricts the ability to evaluate the true scale, intensity, and potential systemic impact on public health posed by such high-risk advertising campaigns.

5.5. Recommendations for Risk Mitigation on Google

Our first recommendation is that Google apply a proactive content moderation toward the campaign by removing advertisements with domains branded with the names of the nutraceuticals from the list of products that we will provide in this investigation.

Second, the persistent nature of this campaign outlines the need for stricter rules governing health-related advertising. The ads appear to breach several of Google's own policies and raise concerns regarding the accountability of advertisers targeting EU consumers.

Lastly, Google's ad repository needs to be made accessible. More than two years after the DSA entered into force, and two years after a report assessing the ad repositories of 11 VLOPs by Mozilla Foundation concluded that none of these repositories fully meet the DSA's transparency and accessibility objectives, key shortcomings remain. X was recently fined €35 million because its ad repository failed to meet its accessibility and transparency obligations under Article 39 of the DSA. A functioning online repository based on keyword searchability would help researchers, journalists, and civil society groups to proactively identify malicious or misleading Google advertising campaigns targeting EU audiences.

6. Global Misleading Campaigns for Dangerous Medical Products: Peptides Sold to Canada

While illegal and grey-area nutraceuticals distributed through affiliate marketing networks appear to target EU markets more heavily, North America is similarly exposed to the social media-driven promotion and sale of potentially dangerous medical products. In Canada, for example, merchants are actively promoting and selling unauthorized injectable drug products online, including via paid advertisements on social media platforms.

Such products present significant health risks, including infection, allergic reactions, dangerous interactions with other medications, and potential exposure to undisclosed or contaminated ingredients. On August 1, 2025, Health Canada issued a warning after seizing 42 unauthorized injectable peptide drugs from a Canadian vendor, citing serious safety concerns. However, our investigation found that similar products remain widely promoted online. Many of the same peptides continue to be marketed, often in injectable form and positioned for bodybuilding, anti-aging, or athletic performance enhancement. These promotions are delivered through social media platforms and specifically targeted at Canadian users, signaling an active and ongoing marketplace for products that have never undergone formal evaluation for safety, efficacy, or manufacturing standards.

Using Meta's Ad Library, we collected all active Canada-targeted advertisements matching 44 peptide-related search terms on December 4, 2025. This search ultimately returned 2,164 peptide-related results. To isolate injectable products, we further filtered for injection indicators in ad copy. This refinement yielded 324 active ads containing clear injection-related markers.

This figure likely understates the true scale of injectable promotion. Many ads avoid explicit injection terminology while visually depicting vials or syringes in images

Where administrator location data was visible, pages were managed from the US, Vietnam, Bangladesh, and Indonesia—and none from Canada, despite explicitly targeting Canadian users. Technical indicators of the vendors' websites suggest Chinese-linked infrastructure underpinning several core domains within the main cluster. WHOIS records also reflect China-associated registration details, with DNS infrastructure hosted in Hong Kong. Facebook page metadata and storefront source code contain Chinese-language elements, reinforcing indicators of overseas development or administration. While these signals do not conclusively establish operator identity, they are consistent with foreign-based actors facilitating the marketing of unauthorized injectable products to Canadian consumers.

A December 22 follow-up pull identified at least 28 newly active injection-explicit ads, 26 of which first appeared on December 21–22, confirming ongoing rotation and replacement of advertising accounts and creatives.

Not all activity appears exclusively offshore. For example, the domain promoted by one Facebook group may have Ontario links based on historical WHOIS records and claims of Canadian shipping. Another advertiser listed a Toronto (437) WhatsApp number, though this alone does not establish a local physical presence.

This case reinforces the need to realign platform incentives by introducing clear accountability and liability for the facilitation and monetization of illegal or harmful advertising. Given the well-documented risks associated with the injectable peptides identified in Health Canada's warning, the continued presence of such products in paid advertising raises concerns about their availability to consumers. While the scope and effectiveness of platform-level oversight fall outside this analysis, the persistence of these advertisements indicates a serious public health issue warranting further regulatory action. Technical and operational indicators identified in this investigation suggest that a significant portion of this advertising activity may be associated with foreign-based merchants operating outside Canada's regulatory framework, which may complicate domestic oversight and enforcement efforts. While we have not determined whether overseas merchants ultimately supply the advertised products or operate no-delivery scams, the analysis also indicates that some advertisers promoting injectable peptides appear to be based in Canada. This underscores the need for further examination of both domestic and cross-border actors involved in this market.

7. Conclusions and Outlook

Social media advertisements serve as the primary gateway into a fraudulent marketing ecosystem, luring audiences across the EU and globally to test potentially dangerous or outright illegal medical products. These ads exploit the full spectrum of human psychological vulnerabilities, targeting the most susceptible audiences: individuals suffering from chronic illnesses who may be looking for treatments online. The campaigns deploy aggressive and manipulative techniques in breach of multiple advertising policies by Meta and Google.

These social media campaigns have been running on Google and Facebook for years. They constitute a systemic risk to public health under the EU DSA. With nearly 20 percent of the nutraceuticals in our list flagged by health authorities and consumer organizations as illegal or dangerous, their continued online promotion highlights the inability of the two VLOPs to effectively curb harmful content.

On Facebook, the systemic evidence of coordinated inauthentic behavior, with the same automated networks of pages running ads on nutraceuticals, investment scams, online gaming, and influence operations such as Doppelganger, raises questions about the platform's readiness to dismantle the nexus of malicious advertisers. Meta continues to focus on removing individual ads, leaving most advertisers dormant but operational, thereby allowing them to launch new campaigns. On Google, ads and advertisers are rarely removed for violations, which raises the question of whether the platform is adhering to its own advertising policies. The limited search functionality of Google’s Ads Transparency Center impedes comprehensive analysis into the scope of this advertising campaign and others. None of the two platforms reveals the budgets of commercial ads, which is problematic in the context of high-risk advertising campaigns targeting public health.

Taken together, these findings highlight significant oversight by the platforms that must be addressed by regulators to safeguard EU audiences from these ongoing advertising activities.

Further Down the Funnel: Tracing the Fake-Authority Ecosystem

This first part of the investigation focuses on social media advertisements; however, these ads represent only the first phase of a multi-channel marketing funnel. This funnel relies on a coordinated ecosystem of fraudulent and misleading digital assets designed to manufacture credibility and legitimacy for the promoted products.

The social media advertisements send traffic to thousands of fraudulent pre-landing and landing pages. These websites employ deceptive tactics such as domain drop snatching (the purchase and immediate reuse of expired domains previously belonging to legitimate organizations) and website spoofing (mimicking the design of legitimate media). The websites feature stock photos or pilfered images to fabricate patient reviews, presenting individuals with fictitious names who

claim to have used the products. The landing pages impersonate medical doctors by misappropriating their photos and attributing product endorsements to them. Together, these tactics are used to mislead audiences and induce them into purchasing the advertised products. In addition to the fraudulent websites, networks of social media profiles have been created to organically amplify the products' online presence. These accounts generate coordinated posts, links, and mentions designed to manipulate search engine optimization and boost the products' ranking in search results.

The second part of our investigation will examine this "fake-authority ecosystem" in its entirety, highlighting the full scope of the campaign and analyzing how multilevel coordination functions.

Appendix: List of Products

The list consists of products that have received official warnings or have been flagged as dangerous or illegal by official health regulators and consumer organizations in the EU and other countries. Products that received multiple warnings are marked with an asterisk (*). The last three columns show the three indicators for including a product in our analysis: the presence of social media ads promoting the product on both platforms and the product's presence on pre-selected vending websites. More detailed information about the vending websites will be provided in the second part of this investigation.

Product name	Targeted disease/medical condition	Health authority	Country	Year of Alert/Notice	Link to Alert/Notice	Indicator 1: Facebook Ads	Indicator 2: Google Ads	Indicator 3: Websites
ABslim	Weight loss	U.S. Food and Drug Administration (FDA)	United States	2018	Link	x	x	x
ABslim*	Weight loss	Therapeutic Goods Administration (TGA)	Australia	2021	Link	x	x	x
ABslim*	Weight loss	National Organization for Medicines (EOF)	Greece	Nov 2019	Link	x	x	x
Acustan	Ear health, Tinnitus	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Adenofrin	Male sexual health, Male potency, Prostatitis	National Organization for Medicines (EOF)	Greece	April 2025	Link	x	x	x
Alkotox	Alcohol addiction	National Institute for Food and Drug Surveillance (INVIMA)—Alerta No. 227-2024	Columbia	Jul 2024	Link	x	x	x
Artizynt	Arthritis, Joint pain, Mobility	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Artizynt*	Arthritis, Joint pain, Mobility	National Organization for Medicines (EOF)	Greece	Jan 2026	Link	x	x	x
Artodip Gel	Arthritis, Joint pain, Mobility	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Aspectra	Eye health	National Institute for Food and Drug Surveillance (INVIMA)—Alerta No. 227-2024	Columbia	Jul 2024	Link	x		x
Audiovico	Ear health, Tinnitus	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Bighunter	Male sexual health, Male potency, Prostatitis	National Organization for Medicines (EOF)	Greece	Apr 2025	Link	x		x
Blutforde	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Blutix (Science Blend)	Diabetes, Blood sugar	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x		x
Cardiline	Cardiovascular health, Blood pressure	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x		x

Product name	Targeted disease/medical condition	Health authority	Country	Year of Alert/Notice	Link to Alert/Notice	Indicator 1: Facebook Ads	Indicator 2: Google Ads	Indicator 3: Websites
Cardiline*	Cardiovascular health, Blood pressure	National Organization for Medicines (EOF)	Greece	Mar 2021	Link	x		x
CardioGenix	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Cardione	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Cardione*	Cardiovascular health, Blood pressure	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	May 2023	Link	x	x	x
Cardione*	Cardiovascular health, Blood pressure	Austrian Federal Office for Safety in Health Care (BASG)	Austria	Oct 2025	Link	x	x	x
Cardiotens Plus	Cardiovascular health, Blood pressure	National Institute for Food and Drug Surveillance -- INVIMA -- Alerta No. 145-2025	Columbia	May 2025	Link	x	x	x
Cardiotens Plus*	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Cardiotensive	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Cardiotensive*	Cardiovascular health, Blood pressure	Altroconsumo (National Consumer organisation)	Italy	Apr 2025	Link	x	x	x
Cardiotensive*	Cardiovascular health, Blood pressure	National Organization for Medicines (EOF)	Greece	Dec 2023	Link	x	x	x
Cardiotonus	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Cardirin (Tropfen)	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x		x
Cardital	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
CleanForte	Antiparasitic, Detoxication	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x		x
CleanForte*	Antiparasitic, Detoxication	National Organization for Medicines (EOF)	Greece	Sep 2022	Link	x		x
Cystinorm	Cystitis, Urinary incontinence	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Cystonette	Cystitis, Urinary incontinence	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Depanten	Arthritis, Joint pain, Mobility	National Organization for Medicines (EOF)	Greece	Aug 2023	Link	x	x	x
Detonic	Antiparasitic, Detoxication	Health Inspectorate of the Republic of Slovenia	Slovenia	2020	Link	x		x
Detonic*	Antiparasitic, Detoxication	National Organization for Medicines (EOF)	Greece	May 2022	Link	x		x
Diaflex Forte	Diabetes, Blood sugar	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Diaform RX	Diabetes, Blood sugar	National Consumer Advice Center	Germany	Mar 2025	Link	x	x	x

Product name	Targeted disease/medical condition	Health authority	Country	Year of Alert/Notice	Link to Alert/Notice	Indicator 1: Facebook Ads	Indicator 2: Google Ads	Indicator 3: Websites
		(Verbraucherzentrale)						
Diaform RX*	Diabetes, Blood sugar	National Institute for Food and Drug Surveillance -- INVIMA -- -- Alerta No.	Columbia	Mar 2023	Link	x	x	x
Diaform RX*	Diabetes, Blood sugar	Altroconsumo (National Consumer organisation)	Italy	Apr 2025	Link	x	x	x
Diaform+	Diabetes, Blood sugar	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023		x		x
DiaTea	Diabetes, Blood sugar	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x		x
Diaxil	Diabetes, Blood sugar	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Diaxil*	Diabetes, Blood sugar	National Organization for Medicines (EOF)	Greece	Oct 2025	Link	x	x	x
Dr. Cardio	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x		x
Erexol	Male sexual health, Male potency, Prostatitis	Altroconsumo (National Consumer organisation)	Italy	Apr 2025	Link	x	x	x
Flexicoldin	Arthritis, Joint pain, Mobility	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Gelarex	Hemorrhoids	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Germivir	Antiparasitic, Detoxication	National Organization for Medicines (EOF)	Greece	Feb 2025	Link	x	x	x
Gluconax	Diabetes, Blood sugar	Altroconsumo (National Consumer organisation)	Italy	Apr 2025	Link	x	x	x
Gluconol	Diabetes, Blood sugar	Austrian Federal Office for Safety in Health Care (BASG)	Austria	Oct 2022	Link	x	x	x
Gluconol*	Diabetes, Blood sugar	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023		x	x	x
Herzena	Cardiovascular health, Blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Hondro Sol	Arthritis, Joint pain, Mobility	Altroconsumo (National Consumer organisation)	Italy	Apr 2025	Link	x	x	x
Hondro Sol*	Arthritis, Joint pain, Mobility	National Organization for Medicines (EOF)	Greece	Mar 2025	Link	x	x	x
Hondrodox	Arthritis, Joint pain, Mobility	National Organization for Medicines (EOF)	Greece	Apr 2025	Link	x	x	x
Hondrofrost	Arthritis, Joint pain, Mobility	National Organization for Medicines (EOF)	Greece	Feb 2024	Link	x	x	x
HondroLife	Arthritis, Joint pain, Mobility	Altroconsumo (National Consumer organisation)	Italy	Apr 2025	Link	x		x
Hondrostrong	Arthritis, Joint pain, Mobility	Ministry of Health	Czechia	2020	Link	x	x	x
Hondrostrong*	Arthritis, Joint pain, Mobility	State Institute for Drug Control	Czechia	2020	Link	x	x	x
Hondrostrong*	Arthritis, Joint pain, Mobility	National Organization for Medicines (EOF)	Greece	Dec 2023	Link	x	x	x
Hondrox	Arthritis, Joint pain, Mobility	Agency for Medicinal Products and Medical	Slovenia	Oct 2023	Link	x	x	x

Product name	Targeted disease/medical condition	Health authority	Country	Year of Alert/Notice	Link to Alert/Notice	Indicator 1: Facebook Ads	Indicator 2: Google Ads	Indicator 3: Websites
		Devices (JAZMP)						
Inspilar	Diabetes, Blood sugar	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x		x
Insulinorm	Diabetes, Blood sugar	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Insulinorm*	Diabetes, Blood sugar	Altroconsumo (National Consumer organisation)	Italy	Oct 2024	Link	x	x	x
Insuvit	Diabetes, Blood sugar	National Organization for Medicines (EOF)	Greece	Feb 2025	Link	x	x	x
Libonex	Male sexual health, Male potency, Prostatitis	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Mennex	Male sexual health, Male potency, Prostatitis	National Organization for Medicines (EOF)	Greece	Apr 2025	Link	x	x	x
MiCardium	Cardiovascular health, blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Mikoherb	Antifungal	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Ocuvit	Eye health	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Ocuvit*	Eye health	National Organization for Medicines (EOF)	Greece	Dec 2023	Link	x	x	x
Onycosolve	Antifungal	National Organization for Medicines (EOF)	Greece	not sure	Link	x	x	x
Ostyhealth	Joint pain, Mobility	National Organization for Medicines (EOF)	Greece	Apr 2024	Link	x	x	x
Ottomax	Ear Health, Tinnitus	National Organization for Medicines (EOF)	Greece	Nov 2023	Link	x		x
Papistop	Skin care, Warts	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x		x
Parazax	Antiparasitic, Detoxication	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Potens Hardmax	Male sexual health, Male potency, Prostatitis	National Organization for Medicines (EOF)	Greece	Apr 2025	Link	x		x
Prostamin	Male sexual health, Male potency, Prostatitis	National Organization for Medicines (EOF)	Greece	Mar 2022	Link	x		x
Prostovit	Male sexual health, Male potency, Prostatitis	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Rectin	Hemorrhoids	National Organization for Medicines (EOF)	Greece	Nov 2023	Link	x	x	x
Reduslim	Weight loss	National Organization for Medicines (EOF)	Greece	Mar 2022	Link	x	x	x
Revitaprost	Male sexual health, Male potency, Prostatitis	National Institute for Food and Drug Surveillance (INVIMA) -- Alerta No. 121-2024	Columbia	Jun 2024	Link	x	x	x
Slimysol	Weight loss	National Consumer Advice Center	Germany	Mar 2025	Link	x	x	x

Product name	Targeted disease/medical condition	Health authority	Country	Year of Alert/Notice	Link to Alert/Notice	Indicator 1: Facebook Ads	Indicator 2: Google Ads	Indicator 3: Websites
		(Verbraucherzentrale)						
Suganorm	Weight loss	National Organization for Medicines (EOF)	Greece	Jan 2019	Link	x	x	x
Titan Gel	Male sexual health, Male potency, Prostatitis	National Institute for Food and Drug Surveillance (INVIMA)-- Alerta No. 132-2025	Columbia	Jul 2025	Link	x	x	x
Tonerin	Cardiovascular health, Blood pressure	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Uromexil	Male sexual health, Male potency, Prostatitis	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Varicobooster	Varicose veins	National Organization for Medicines (EOF)	Greece	Jan 2019	Link	x		x
Vermixin	Antiparasitic, Detoxication	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Viscerex	Cardiovascular health, blood pressure	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Weight Berry	Weight loss	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Wortex	Antiparasitic, Detoxication	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
O caps		Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
DiaDrops	Diabetes, Blood sugar	Agency for Medicinal Products and Medical Devices (JAZMP)	Slovenia	Oct 2023	Link	x	x	x
Flexosamine	Arthritis, Joint Pain, Mobility	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x	x	x
Reduslim	Weight loss	National Consumer Advice Center (Verbraucherzentrale)	Germany	Mar 2025	Link	x		x

Table A1: List of nutraceuticals that received warnings and alerts from official health regulators and consumer organizations in the EU and other countries.

Reset•Tech

Reset Tech is a public policy organisation advocating for technology that protects children, consumers, and public safety. Our highly experienced team of researchers, policy experts, storytellers, and operational specialists work across the UK, Europe, Canada, and the United States.

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