# ADM+S Submission to the Senate Select Committee on Information Integrity on Climate Change and Energy

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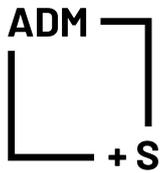
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**ARC Centre of Excellence for Automated Decision-Making and Society**

5 September 2025

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## Acknowledgement of Country

In the spirit of reconciliation, we acknowledge the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

## Suggested citation

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## ARC Acknowledgement

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# About ADM+S

The ADM+S is pleased to have this opportunity to engage with The Senate Select Committee on Information Integrity on Climate Change and Energy. The ARC Centre of Excellence for Automated Decision-Making and Society (ADM+S) is a cross-disciplinary, national research centre established and supported by the Australian Research Council to create the knowledge and strategies necessary for responsible, ethical, and inclusive automated decision-making (ADM).[1]

# This submission

This submission is the product of a collaborative process involving direct contributions from the above researchers from ADM+S, as led and consolidated by Prof Daniel Angus (QUT). ADM+S researchers come from many different institutions, disciplines and perspectives. It should not be assumed that every contributing author, or every member of the Centre subscribes to every comment or recommendation in this submission. The submission represents our best effort to consolidate research and thinking in a way that can be useful to the Committee and The Parliament of Australia more broadly. We are happy to put the Committee in touch with experts in the Centre for further discussion.

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[1] More information about ADM+S and its research may be found on our website, http://www.admscentre.org.au/

# Executive Summary

## Introduction

This submission draws on research conducted by the ADM+S Australian Ad Observatory team ahead of the 2025 Federal Election to track political advertising in key electorates. The McKinnon Foundation supported this work by funding participant recruitment. We recruited more than 106 people in these electorates to install the Observatory's ad collection tool on their phones during the two weeks prior to election day and collected a total of 22,370 ads. We then sorted through these ads to identify and analyse the political ads they received, noting that this did not include unsponsored, user-generated content.

Of the 580 political ads seen by our participants, many focused heavily on energy and climate change, often in relation to increases in energy prices and the cost of living. As well as political parties, 7% of these ads came from third party organisations with a strong focus on energy and climate.

Additionally, we used the PoliDashboard tool, developed and supported by our academic partners at the Social Media Lab (Toronto Metropolitan University), to track spending by major political parties, third-party organisations, and other actors.

This submission summarises our key findings, focusing on third party groups, energy misinformation and political advertising.

## Key Findings

- **Astroturfing is mainstream.** Campaigns designed to appear grassroots are in fact coordinated, well-financed, and often linked directly to major political parties, donors, or lobby groups.
- **Climate and energy are prime targets.** Most third-party advertising during the 2025 Federal Election focused on energy costs, nuclear power, and climate action, framing vested interests as "ordinary Australians."
- **Systematic misrepresentation.** Groups with names like *Mums for Nuclear* or *Australians for Natural Gas* disguised their partisan or corporate origins, sometimes even copying the identity of legitimate grassroots organisations.
- **Heavy spending and reach.** Lobby groups spent big during the 2025 Federal Election, running thousands of ads with millions of impressions, in some cases rivalling official party campaigns.
- **Regulatory gaps.** Many groups skirted Australian Electoral Commission (AEC) authorisation requirements, and spread misleading claims not captured by existing legislation.

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## Implications

Astroturfing distorts democratic debate by presenting partisan messaging as community consensus. Groups use this tactic to spread misleading or decontextualised claims in hotly contested policy domains like climate and energy. This practice undermines informed public discussion and erodes confidence in democratic institutions.

## Recommendations

1. National truth in political advertising laws to address misleading factual claims.
2. Real-time disclosure of third-party funding and donors, closing loopholes that allow concealment.
3. Consistent blackout rules across broadcast and digital media to prevent legislative circumvention.
4. Platform accountability: require accurate classification and disclosure of advertisers to stop mislabelling (e.g. lobby groups as "community organisations").
5. Independent monitoring support (e.g. via the Australian Internet Observatory) to track hidden digital influence ecosystems and provide independent transparency.

## Conclusion

Astroturfing in climate and energy debates is not the work of fringe actors. It is a systematic strategy of mainstream political and corporate players. Without urgent reforms in transparency, disclosure, and truth-in-advertising, these practices will continue to warp Australia's climate and energy policy debates at a time when evidence-based decision making is most critical.

## About the ADM+S Australian Ad Observatory

More than 94% of adult Australians use commercial social media[2] where they encounter the targeted advertising that has become the primary means of financial support for such platforms. Unlike mass media ads, online ads are harder to track and observe for the purposes of transparency and accountability. Online political advertising raises particular concerns about the spread of misinformation, non-transparent advertising, and non-compliance with Australian Electoral Commission (AEC) rules. The ARC Centre of Excellence in Automated Decision-Making and Society's (ADM+S) Australian Ad Observatory (AAO) research project[3] seeks to create a level of transparency for online advertising by deploying a Mobile Online Advertising Tool (MOAT), developed in partnership with the Australian Internet Observatory[4], which allows users to automatically capture the ads they see on mobile apps and share them with researchers.

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[2] Jemma Millington Buck, "2025 Social Media Statistics for Australia," *Meltwater* blog, June 11, 2025, https://www.meltwater.com/en/blog/social-media-statistics-australia
[3] https://www.admscentre.org.au/ad-observatory-project/
[4] https://internetobservatory.org.au/

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# Detailed Responses to Terms of Reference

**(b) how misinformation and disinformation related to climate change and energy is financed, produced and disseminated, including, but not limited to, understanding its impact on: (i) Australian politics, (ii) domestic and international media narratives, and (iii) Australian public policy debate and outcomes**

Digital platform advertising is a key mechanism for amplifying climate change contrarian narratives, enabling well-funded advocacy groups to reach millions of Australians at relatively low cost. Elections and major policy debates serve as flashpoints for these campaigns worldwide[5], where targeted ads can frame renewables as unreliable, fossil gas as essential, or nuclear as inevitable, often through misleading or decontextualised claims. By exploiting the precision targeting and scale of platforms like Facebook and Instagram, these groups can inject contrarian messaging directly into the policy debate at moments of peak public attention, shaping narratives in ways disproportionate to their apparent grassroots presence and with minimal accountability or meaningful disclosure of funding sources[6].

Analysis of Meta's political ad library through the Polidashboard[7] tool reveals how third-party advocacy groups with links to fossil fuel interests or right-wing political movements were among the most active spenders on digital advertising in the lead-up to the 2025 federal election (1st Jan 2025 – 3rd May 2025). For context, major political parties such as the Australian Labor Party (~$9.11mil spend; ~653mil impressions) and the Coalition ($9.2m; ~601m impressions) naturally dominate the overall political ad landscape[8], however their activity was closely rivalled by large-scale third-party actors.

Right-wing lobby group Advance Australia, for example, ran 4,443 Meta ads, spending between $1.0–$1.6 million, and generating ~193 million impressions. This level of activity placed Advance in the same league as the major parties, despite not being a registered political party. The bulk of Advance's paid advertising for this period focused on broader culture war issues such as the Voice to Parliament, personal attacks on political opponents, and other forms of malinformation. However, the organic activity of the page consistently pushes

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[5] InfluenceMap. "Facebook's $1M Climate Misinformation Pledge Overshadowed by Big Oil Ad Revenue." Press release, September 16, 2021. https://influencemap.org/pressrelease/Facebook-s-1M-Climate-Misinformation-Pledge-Overshadowed-by-Big-Oil-Ad-Revenue-af73c6f72a8992487af470b1bd5999d2

[6] Daniel Angus and Mark Andrejevic, "'Dark Ads' Challenge Truth and Our Democracy," 360info, February 25, 2025, https://360info.org/dark-ads-challenge-truth-and-our-democracy/.

[7] https://app.polidashboard.org/meta_ads?country=au&startDay=01-01-2025&endDay=05-03-2025

[8] Note that these figures aggregate all federal, state and local candidate pages

strongly against Australia's net-zero targets and amplifies climate contrarian arguments. By combining high-volume culture-war advertising with persistent anti-renewable and anti-climate organic messaging, Advance is attempting to influence the wider public sphere in ways that rival party campaigns while evading the same levels of scrutiny and accountability.

Other notable third-parties include:

- **Australians for Prosperity**: 570 ads, **$280,000–$390,000** in spend, with ~33 million impressions. Framed as "community advocacy," but functioned as a vehicle for fossil-fuel-aligned messaging.
- **Australian Taxpayers' Alliance**: 190 ads, **$206,000–$267,000** in spend, ~14 million impressions. Positioned its anti-renewables and pro-fossil fuel arguments as taxpayer advocacy.
- **Nuclear for Australia:** 107 ads, **$356,000-$443,000** in spend, ~20 million impressions/ Pushing strongly pro-nuclear messaging.

In each case, the level of spend and reach was vastly disproportionate to the groups' apparent community standing, with some having negligible organic followings outside of paid campaigns. What is striking is not only the scale of expenditure but the systematic targeting of climate and energy issues. Even where pages framed themselves more broadly, around families, affordability, cost of living, the dominant themes of their advertising were opposition to renewables, defence of fossil gas, and promotion of nuclear power.

The impact on media narratives and policy debates relating to climate change is significant. These groups blur the line between legitimate community advocacy and covert lobbying, while injecting highly polarising, misleading claims about renewables, nuclear, and fossil gas into the national debate.

## (c) the origins, growth and prevalence of 'astroturfing' and its impact on public policy and debate

Astroturfing, the practice of masking the sponsors of a message to make it appear as though it originates from grassroots citizens or community organisations, has become a defining feature of contemporary Australian election advertising. While the tactic has international precedents and long-standing roots in corporate lobbying, its scale and centrality in the 2025 Federal Election mark a new phase in its growth.

The Australian Ad Observatory[9] recruited 106 ordinary Australians in the lead-up to the 2025 Australian Federal election. These participants downloaded and installed a custom app developed by the Australian Internet Observatory[10] that captured ads they encountered through regular use of their mobile phone while on Facebook, Instagram, and TikTok, donating

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[9] https://www.admscentre.org.au/ad-observatory-project/
[10] https://internetobservatory.org.au/

these to a central and secure database. Over the 4 weeks leading up to the election this amounted to 22,370 advertisements, 580 of which were subsequently classified as political. This collection provides a unique insight into how astroturfing now functions as an entrenched campaign strategy. Of the 580 political ads seen by our participants, roughly 7% were advertised by third parties. While some of these originated from genuine, albeit potentially well-organised, individual or group accounts, many masked their corporate backing, presenting themselves as grassroots initiatives. These were not incidental or marginal campaigns. Instead, they were highly professional, well-financed, and targeted, with many groups running hundreds of variations of ads over a short window leading into polling day.

What distinguishes astroturfing in this election is its concentration on energy and climate policy, reflecting the high economic stakes surrounding the future of Australia's energy system. Groups that presented themselves as ordinary parents or small community organisations, frequently carried clear partisan, corporate, or donor-backed agendas. These campaigns ran alongside, and in some cases rivalled, the scale of official party advertising.

## Origins and growth

Astroturfing as a defined political strategy has antecedents in corporate campaigns of the late 20th century, but have become more widespread in the past two decades[11]. Astroturfing is the practice where industry groups and think tanks create ostensibly independent front organisations to influence regulatory reform, styling these as supposedly 'grassroots', 'independent' or 'community' organisations. What has changed from the astroturfing of the tobacco and fossil fuel lobbies to now is the digital advertising ecosystem in which these campaigns now operate. Social media platforms provide the ability to target specific audiences, classify pages under misleading categories, and run thousands of variants of a message, often at relatively low cost per impression. Unlike in the mass media era, where it was possible to observe what was being broadcast and keep it more-or-less in check, today's digital platforms are far more personalised, and we lack adequate tools to independently monitor these campaigns. This has enabled astroturf campaigns to grow in sophistication and reach, while remaining opaque to the public and to regulators.

The 2025 election highlighted the extent of this growth. Many groups appeared online only in the months leading up to the election, rapidly creating new pages, branding, and advertising material. Others could be seen as local offshoots of international campaigns, adapting global messaging to the Australian context. A striking feature was the use of mimicry: several groups adopted names or visual identities closely resembling existing grassroots organisations, thereby creating confusion among voters as to their authenticity.

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[11] Cho, C.H., Martens, M.L., Kim, H. *et al*. Astroturfing Global Warming: It Isn't Always Greener on the Other Side of the Fence. *J Bus Ethics* **104**, 571–587 (2011). https://doi.org/10.1007/s10551-011-0950-6

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## Prevalence during the federal election

The prevalence of astroturfing during the 2025 election is clear from both the volume of ads and the size of advertising spends. Polidashboard figures indicate that some groups spent well into six-figure sums during the campaign period[12]. Estimated spending on pages such as Australians for Prosperity ($220k - $290k), Australian Taxpayer's Alliance ($206k - $265k), Mums for Nuclear ($49k -$62k), and Australians for Natural Gas ($37k - $54k), show these pages engaged in sustained advertising activity far exceeding what would be expected of genuine small-scale community groups.

These were not isolated outliers. Instead, the Ad Observatory findings, and those from PoliDashboard, point to a systemic reliance on astroturfing techniques across the political spectrum. While some groups explicitly disclosed partisan affiliations, many others obscured their origins. Ads were often authorised by individuals with direct connections to major political parties or their internal polling operations, but the branding and messaging emphasised the voice of "ordinary Australians." This deliberate ambiguity seemingly allowed some groups to avoid registration with the Australian Electoral Commission as Significant Third Parties, despite apparently surpassing the spending thresholds that would trigger such requirements. Others provided a vague authorisation statement to an office in Sydney which said nothing about the true origins of the advertising.

The concentration of astroturfing activity on climate and energy policy is particularly significant. Energy costs, nuclear proposals, and renewables were central themes across these third-party ads. Campaigns frequently framed themselves as defending households from rising bills, or as giving parents, workers, or farmers a voice. Yet behind this messaging were partisan agendas designed to attack the policies of rival parties, or corporate strategies aimed at shaping public opinion on energy transition in ways favourable to industry interests.

## Impacts on public policy and debate

The impact of this growing prevalence of astroturfing is to distort democratic debate on climate and energy. There are three key consequences.

First, astroturfing masks vested interests as community consensus. By presenting coordinated, donor-backed campaigns as the spontaneous voice of "everyday Australians," these groups artificially inflate the appearance of public support for policy directions. This can influence both voters and policymakers, creating a false impression of widespread grassroots mobilisation.

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[12] Polidashboard is an independent advertising monitoring tool developed by Social Media Lab in Canada, and supported by the QUT Digital Media Research Centre in Australia. The PoliDashboard tool aggregates political spend and reach data, here we highlight the 4-week period leading to the election: https://app.polidashboard.org/meta_ads?country=au&startDay=04-05-2025&endDay=05-03-2025

Second, it normalises misinformation and decontextualised claims. Many ads relied on misleading statistics, cherry-picked figures, or emotive imagery that lacked context. Nuclear energy, for example, was often presented as a simple fix for energy affordability, with no acknowledgement of cost ranges, implementation timelines, or international experience. Similarly, ads for natural gas present it as a necessary "transitional" energy resource, despite these claims being contested by credible and independent energy market commentators.[13] Such claims erode the quality of policy debate by replacing substantive discussion with polarising, simplified narratives.

Third, astroturfing exploits regulatory and platform loopholes. Current electoral law requires disclosure and authorisation, but these provisions are easily circumvented when organisations present as charities, satire pages, or community groups. Platform transparency tools are insufficient, allowing groups to self-select and misclassify themselves under categories such as "environmental conservation" or "non-profit," even when operating as political lobbyists. In practice, the authorisation tags that do appear on ads are often meaningless to ordinary users, for example, "M. Smith, 123 Main St, Sydney 2000" provides no genuine insight into who is funding or coordinating the campaign. The lack of real-time disclosure further compounds the problem, with sources of funding for these campaigns hidden from public view until long after elections have concluded.

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[13] Hillman, A. (2022, February 15). *Facts over fiction: Debunking gas industry spin*. Australasian Centre for Corporate Responsibility. https://www.accr.org.au/research/facts-over-fiction-debunking-gas-industry-spin/

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## Exemplar cases

Several specific cases demonstrate how these dynamics play out in practice. Groups such as *Mums for Nuclear*, *Australians for Natural Gas*, and *Energy for Australians* each exemplify different astroturf tactics: international franchising of campaigns into the Australian context, direct links to party pollsters, and mimicry of existing grassroots organisations. While not strictly an astroturf organisation, *Advance Australia* is another notable example as it operates as a large-scale third-party advertiser that rivals official party campaigns. Its practices, such as creating Facebook pages branded as "Election News" that mimic the style of legitimate journalism, while failing to disclose funding sources, illustrate how actors outside the party system can still shape the energy debate through strategies that blur the boundaries between authentic civic engagement, political advertising, and news media. Taken together, these examples highlight that astroturfing tactics are not confined to fringe actors or minor players. It is now a systemic campaign strategy employed across the political spectrum, particularly on energy and climate issues where the stakes are highest.

### Case 1: Mums for Nuclear

**Background:** Mums for Nuclear presents itself as a grassroots, family-oriented organisation focused on the impact of energy prices on households. It is modelled directly on international campaigns such as Mothers for Nuclear (USA, Germany). The campaign frames nuclear power as a solution to rising household bills and climate concerns, targeting parents, especially mothers,



with messaging about the cost of groceries, school supplies, and energy bills.



**Misleading Aspects:** Ads promoted nuclear energy as a straightforward solution to affordability and emissions reduction, with exaggerated claims such as "Nuclear energy has taken the same as 400 million cars off the road." These were based on selective international figures and lacked contextual explanation.

**Spend:** Between $49,000 and $61,500 on Meta ads during the election campaign, achieving more than 1.2 million impressions despite a negligible organic following (fewer than 600 total social media followers).

**Registration:** Not listed on the AEC Transparency Register despite significant expenditure.

**Connections:** Tied to broader international networks advocating for nuclear energy. Ads featured known nuclear advocates, including Australian lobbyists linked to the Coalition's pro-nuclear policy stance.

*Case 2: Australians for Natural Gas*

Australians for Natural Gas appeared as a community-led campaign advocating for natural gas as an essential energy solution. Ads depicted everyday Australians, tradespeople, families, cooks, celebrating natural gas as affordable, reliable, and part of national identity. Messaging leaned on emotive slogans such as "It's time to turn on the gas."



**Misleading Aspects:** While framed as the only affordable option, gas is one of the most expensive forms of energy in Australia. Ads implied it was the key solution to rising electricity prices without acknowledging the role of renewables or the real cost comparisons.

**Spend:** Between $33,000 and $49,000 on Meta ads during the election period.

**Registration:** Not registered as a Significant Third Party despite expenditure levels.

**Connections:** Authorised by "D. Turner" in Brisbane, who is in fact the Coalition's internal pollster. Clear evidence of partisan affiliation, yet presented as a neutral, community-based organisation.

*Case 3: Energy for Australians*

Energy for Australians was a pro-nuclear organisation created shortly before the 2025 Federal Election. It adopted a name nearly identical to an existing grassroots anti-nuclear campaign (Energy for Australia), creating deliberate confusion. Ads highlighted household energy costs and blamed the ALP government for price increases, framing nuclear energy as the patriotic, "Aussie-made" solution.

**Misleading Aspects:** Messaging such as "Can't afford power. Can't afford Labor" presented cost claims without reference to global markets or the timeframe for nuclear implementation.

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Authorised by S. Lee, Energy for Australians, Sydney
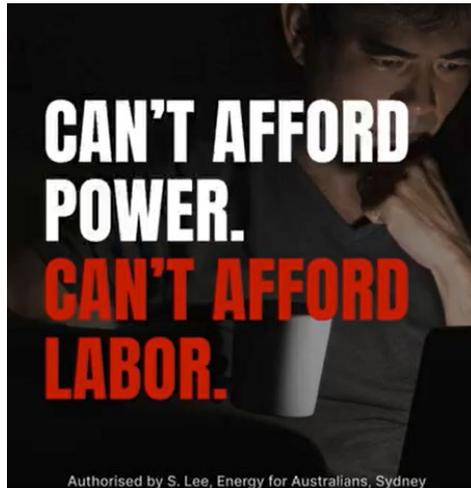
Mimicry of a genuine grassroots group misled voters about the source and intent of the campaign.

**Spend:** Between $100,000 and $113,000 on Meta ads during the campaign, with more than 7.7 million impressions.

**Registration:** Registered with the AEC Transparency Register as a Significant Third Party, but online presence was minimal prior to April 2025, suggesting a campaign created almost solely for the election period.

**Connections:** Strongly anti-ALP. No explicit party affiliation disclosed in advertising, but timing and messaging aligned closely with Coalition positioning on nuclear energy.

## (f) the efficacy of different parliamentary and regulatory approaches in combating misinformation and disinformation, what evidence exists and where further research is required, including through gathering global evidence

The evidence gathered during the 2025 Federal Election shows that Australia's current regulatory settings are inadequate to address the challenges of misinformation, disinformation, and in particular the rise of astroturfing in climate and energy debates. While electoral law requires disclosure and authorisation of political advertising, these provisions are narrow, inconsistently enforced, and poorly adapted to the realities of digital campaigning. The result is an ecosystem in which well-financed third-party organisations can appear to be grassroots groups, spread misleading or decontextualised claims, and mask their true funding sources.

Misleading or decontextualised climate and energy claims, when made by private companies, could face enforcement action as misleading greenwashing, contrary to prohibitions on misleading and deceptive conduct in the Australian Consumer Law and other legislation.[14] But when they appear to be political or community advertising, these misleading claims may escape scrutiny by business regulators like the Australian Competition and Consumer Commission or Australian Securities and Investment Commission, even if it is a commercial interest who has in fact funded the ad. This inconsistency between the increasing intolerance

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[14] See Christine Parker and Hope Johnson, (2025), Climate-related greenwashing and Australian Consumer Law. In Julia Dehm, Nicole Graham and Zoe Nay (eds) *Becoming a Climate Conscious Lawyer: Climate Change and the Australian Legal System* (Latrobe eBureau, 2024-2025). Available at: https://www.latrobe.edu.au/library/open-scholarship/ebureau/publications/becoming-a-climate-conscious-lawyer

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of and commitment to enforcement against commercial greenwashing[15] and the lack of ability to monitor and enforce misleading political advertising is deeply problematic in the context of Australia's commitments to take positive climate action and avoid greenwashing.

## Lessons from Existing Parliamentary and Regulatory Approaches

South Australia and the ACT remain the only jurisdictions with truth in political advertising provisions. These provide a useful precedent by establishing that demonstrably misleading factual claims should not circulate unchecked during election periods. However, their scope is limited to those jurisdictions, and their enforcement is meek compared to the scale of national digital campaigning. A national regime of truth in political advertising laws is required to provide consistency and credibility, and consideration should be given to whether such a regime could operate and be enforced year-round, not just during elections.[16] Scope for such laws should be examined to ensure these capture advertising not only of registered political parties, but also of significant third parties (e.g. unions, associations, resident and business groups).[17]

The Australian Electoral Commission's disclosure framework also lags behind the pace of contemporary campaigning. The absence of real-time disclosure allows groups to spend heavily in the weeks before polling day without meaningful scrutiny until months later. As noted above, disclosure tags that do appear on digital platforms and physical materials are often meaningless to voters, undermining the transparency principle that underpins Australia's electoral law.

Parliamentary inquiries have repeatedly noted the gap between analogue-era regulation and digital-era campaigning. What the 2025 election demonstrates is that those gaps are now being systematically exploited. Internationally, regulatory initiatives such as the European Union's Digital Services Act (DSA) point towards stronger obligations on platforms to share key data with researchers, enable oversight, and restrict certain opaque targeting practices. While the DSA is not without flaws, it represents a critical step in aligning democratic safeguards with platform accountability. Australia's regulatory approach remains well behind this trajectory.

## The Role of Independent Monitoring

It is important to stress that our ability to identify and evidence these practices at the 2025 election was not the result of parliamentary regulation, but of investment in national research infrastructure and innovative academic research programs. The Australian Ad Observatory,

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[15] See eg Joe Longo (Chair of ASIC), Greenwashing: A view from the regulator (ASIC, 2 May 2024) https://www.asic.gov.au/about-asic/news-centre/speeches/greenwashing-a-view-from-the-regulator/

[16] Yee Fui Ng, Truth in political advertising laws: design, operation, effectiveness and recommendations for reform, (Monash University, 2024) https://apo.org.au/node/329295

[17] Ibid.

operating through the ARC Centre of Excellence for Automated Decision-Making and Society, was only able to capture these ads because of new infrastructures developed and maintained through the Australian Internet Observatory.[18] Without these tools, and due to the many shortcomings of the ad libraries of major platforms, the ads would have remained largely invisible, ephemeral and unrecorded in the fast-moving digital environment.

We also need independent organisations dedicated to information-integrity research outside academia, such as AAP FactCheck. However, many of these programs have recently faced severe funding constraints, forcing some to scale back operations or close.[19] In the absence of secure, long-term support and mandated data-sharing frameworks, the capacity to monitor digital platforms is being eroded while new challenges continue to emerge. This includes the growing capabilities of generative artificial intelligence in political campaigning and the proliferation and further sophistication of astroturfing operations. Without protections that guarantee sustained access to observable data and analysis by independent Australian research and oversight bodies, Australian voters may be left in the dark about hidden forces which may be seeking to influence political processes and their outcomes.

This demonstrates the critical role of independent, researcher-led monitoring in ensuring observability. As campaigning moves increasingly into targeted digital formats, traditional media monitoring and electoral oversight are no longer sufficient. To ensure continuity, there must be sustained public investment in such infrastructure through the National Collaborative Research Infrastructure Strategy (NCRIS). Building capacity for observability is as essential to electoral integrity as the electoral roll or campaign finance rules.

At present, these research efforts operate on fragile, short-term funding, despite producing evidence that has been central to understanding the dynamics of digital campaigning. A long-term investment framework is required to ensure that the next federal election, and those beyond, are subject to robust and independent scrutiny.

However, the responsibility for ensuring compliance with electoral law should not rest on researchers alone. Public agencies such as the AEC and ACCC must also be resourced to develop digital monitoring capacities, working in durable partnership with academia. National research infrastructure can pioneer and test the methods needed to track emerging threats, while agencies adapt these approaches for operational oversight. To make this sustainable, large online platforms, who derive significant revenues from digital advertising, should bear a share of the cost of this capacity.

Our recommendations therefore call for continued and increased investment in research infrastructure, alongside stronger agency capacity, to ensure that observability is not only

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[18] The Australian Internet Observatory received co-investment from the Australian Research Data Commons (ARDC) through the HASS and Indigenous Research Data Commons. The ARDC is enabled by the National Collaborative Research Infrastructure Strategy (NCRIS).
[19]The scale back of Australian independent fact-checking organisations and potential impacts on Australian voters has been discussed further by ADM+S affiliated researchers here: https://360info.org/why-voting-in-a-fact-checking-void-should-worry-you/

innovated within academia but embedded across the institutions tasked with protecting Australia's democratic processes.

We stress that the burden of demonstrating compliance and pro-social activity must be placed on corporate actors, namely large online platform companies with significant digital advertising stakes or revenues that conduct commercial activities either in Australia, concerning Australian electoral processes, or involving Australian customers' data, but that this does not affect the independence of findings.

## Future Directions

The evidence points to five clear priorities for parliamentary and regulatory reform:

1. National truth in political advertising laws to cover misleading factual claims, extending protections currently only available in South Australia and the ACT to a national level.

2. Real-time disclosure of third-party funding and donors, closing loopholes that allow concealment of financial backers until long after election campaigns have concluded.

3. Consistent blackout rules across broadcast and digital media to prevent parties and third-party advertisers from exploiting gaps between analogue and online campaigning environments.

4. Platform accountability, requiring accurate classification and disclosure of advertisers to stop the deliberate mislabelling of lobby groups as "community organisations" or "non-profits."

5. Independent monitoring support, through sustained investment in national research infrastructures such as the Australian Internet Observatory to track hidden digital influence, while building durable partnerships with public agencies and requiring platforms to contribute to the costs of this essential democratic oversight.