

A FIMI-oriented assessment of deceptive health ads and potential systemic infringements affecting Belgium

This short deliverable aims to apply EU DisinfoLab’s [toolkit](#) for detecting, assessing, and responding to Foreign Information Manipulation and Interference (FIMI) to an incident affecting Belgium. The case selection came from a recent, broader [investigation](#) conducted by Reset Tech into deceptive health advertising infrastructures across Facebook and Google. The report – also amplified by [The New York Times](#) – documents how misleading health-related products are promoted through coordinated advertising systems that rely on clickbait narratives, fabricated claims, and opaque advertiser networks.

The term Foreign Information Manipulation and Interference (FIMI) refers, following the definitions used by VIGINUM and the European External Action Service (EEAS), to “a pattern of behaviour that threatens or has the potential to negatively impact values, procedures and political processes” and that involves foreign actors engaged in “information manipulation.”¹

The assessment above applies EU DisinfoLab’s FIMI toolkit for detecting, assessing, and responding to FIMI, which provides structured checklists for determining whether an incident qualifies as FIMI, whether it constitutes a systemic violation of platform policies or EU and national law, and what countermeasures have been taken or could be pursued. The toolkit organises its assessment around three core dimensions:

- **Incident qualification:** evaluating whether the conditions for FIMI are met (foreign actor involvement, manipulative behaviour, intentionality, coordination, and impact), and whether the incident is isolated or part of a broader campaign.
- **Violation assessment:** identifying potential breaches of national law, EU law (in particular the Digital Services Act), and platform Terms of Service, with particular attention to systemic risks linked to platform inaction or inconsistency.
- **Countermeasure mapping:** documenting existing responses by platforms, researchers, regulators, and civil society, and identifying gaps where additional action could be taken.

Although BELUX countries are not primary targets, listed products occasionally reach Belgian audiences. In particular, we selected a [specific incident](#) identified within the Facebook Ad Library, involving the promotion of “Titan Gel,” a so-called male enhancement product whose effectiveness is highly disputed and lacks robust scientific evidence.

A relevant element is that the advertiser “[Beautyfull Strenght](#)” (spelling as in the original)- is a page managed from Vietnam. This indicator does not provide sufficient proof to conclusively classify the case as FIMI. However,

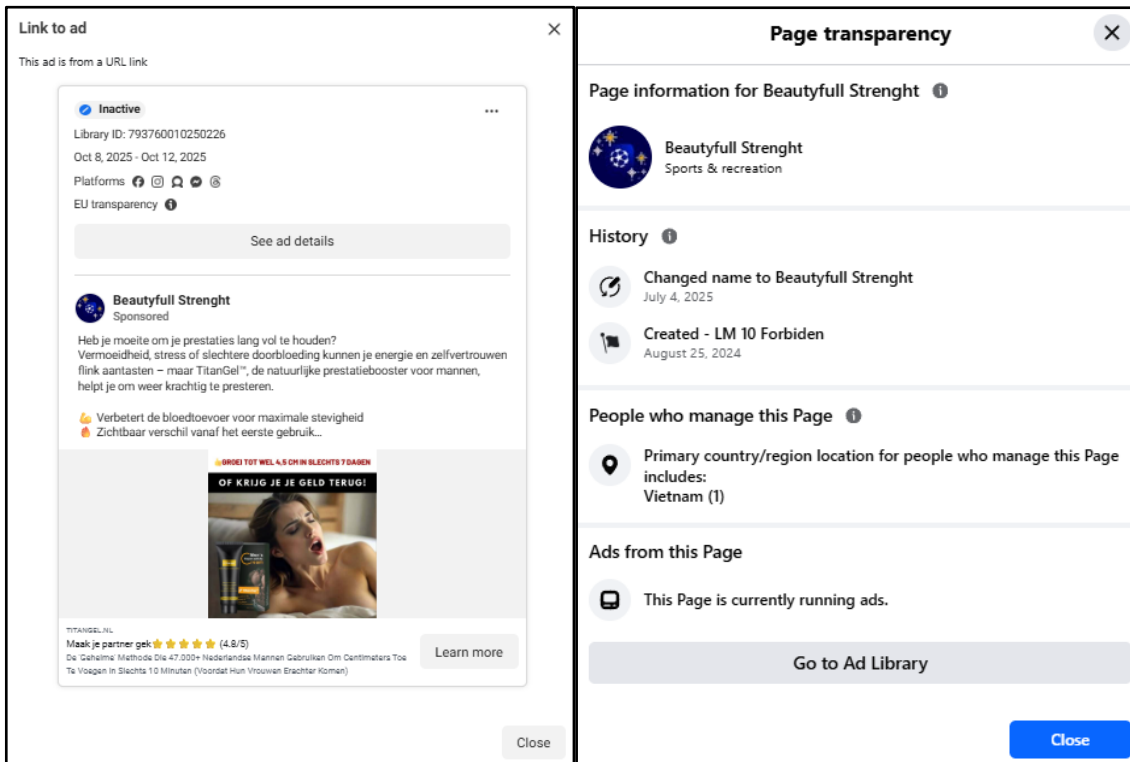
¹ European External Action Service, 1st EEAS Report on Foreign Information Manipulation and Interference Threats, January 2023: <https://www.eeas.europa.eu/sites/default/files/documents/2023/EEAS-2023-1257-01.pdf>

it is relevant to note the presence of cross-border elements and the potential involvement of foreign-based infrastructures targeting EU audiences.

Vietnam has been recently mentioned by the [European Digital Media Observatory \(EDMO\)](#) (in an analysis conducted by BROD – the Bulgarian-Romanian hub) in the context of Vietnamese bot farms amplifying pro-Russian narratives during the 2025 Moldovan elections. Moreover, findings from [Correctiv](#) suggest that Vietnam-linked infrastructures have been associated with deceptive and misleading content aimed at EU audiences, including in the context of regional elections in Germany. While attribution and intent remain unclear, the use of such infrastructures to disseminate political messaging signals a potential capacity to target audiences beyond purely commercial purposes. This emerging pattern therefore warrants continued monitoring and closer scrutiny.

Despite uncertainty regarding the classification of the incident as FIMI, the monitoring templates are applied precisely to assess whether a cross-border incident can be considered FIMI. This approach enables a structured evaluation of relevant indicators while also identifying potential systemic risks linked to violations of platform policies, as well as national and EU regulations.

Ultimately, the assessment does not conclusively indicate that the incident constitutes FIMI or forms part of a FIMI campaign. However, it highlights the presence of potential legal concerns, including indications of systemic risks under the *Digital Services Act* (DSA), as well as the need to strengthen countermeasures.



The image displays two side-by-side screenshots from a digital advertising platform. The left screenshot, titled "Link to ad", shows an advertisement for "Beautyfull Streight". The ad text in Dutch reads: "Heb je moeite om je prestaties lang vol te houden? Vermoeidheid, stress of slechtere doorbloeding kunnen je energie en zelfvertrouwen flink aantasten – maar TitanGel™, de natuurlijke prestatiebooster voor mannen, helpt je om weer krachtig te presteren." Below the text is an image of a woman and a product box. The right screenshot, titled "Page transparency", shows information for the advertiser "Beautyfull Streight". It includes a history of changes: "Changed name to Beautyfull Streight" on July 4, 2025, and "Created - LM 10 Forbiden" on August 25, 2024. It also lists the primary country/region for people who manage the page as Vietnam (1).

Left: screenshot of the analysed advertisement, featuring the copy "Do you struggle to sustain your performance for long periods?".
On the right: Page transparency information of the advertiser, including location data.

Part 1. Checklist for incident qualification

A. IS THIS FIMI?		
1. FOREIGN ACTORS		
Are foreign actors engaging in this incident?	Yes	No
If yes, are they state actors ?	Yes	No
If yes, are they the initiators ?	Yes	No
If yes, are they the amplifiers ?	Yes	No
If amplifiers, is there evidence of a direct connection with the initiators?	Yes	No
At this stage, the available evidence indicates the presence of foreign actors. However, it is not sufficient to determine whether the incident constitutes FIMI. A conclusive assessment would require further analysis at a later stage.		
2. BEHAVIOUR		
2.1 MANIPULATION		
Does the incident show manipulative behaviour?	Yes	No
If yes, does it include disinformation ?	Yes	No
If yes, what is the narrative circulated?		
The advertisement claims that Titan Gel improves male sexual performance “from the first use.”		
Did a cyberattack happen before or after the (dis)information was shared?	Yes	No
Does the incident use other TTPs for manipulative purposes?	Yes	No
<ul style="list-style-type: none"> - Content-wise, the ad develops image-based content (likely through cheap fakes); - Audiences are microtargeted through clickbait, localised content, and targeted advertising; - The incident includes a link to an external website, which is currently inaccessible. However, based on the modus operandi observed across the broader network, it is likely that the site was inauthentic and featured fake expert reviews. 		
2.2 INTENTIONALITY		

Does the incident show evidence of intentionality ?	Yes	No
Is the purpose of the incident clear?	Yes	No
The strategic end is economic advantage and the objective is to make money.		
2.3 COORDINATION		
Does the incident show evidence of coordination ?	Unclear	
The report documents coordination within the broader network. Nonetheless, since this incident is not specifically referenced, its connection to the campaign cannot be conclusively established. Although this is not sufficient evidence of coordination, it seems relevant to flag that other ads by the same advertiser exist, using identical copy in Dutch: https://www.facebook.com/ads/library/?id=1316950162706095 , https://www.facebook.com/ads/library/?id=1865391614854549 , https://www.facebook.com/ads/library/?id=24206421632370713 , https://www.facebook.com/ads/library/?id=2186862575147932 .		
3. IMPACT		
Did the incident achieve considerable reach (diffusion)?	Yes	No
Did the incident achieve considerable outreach (engagement)?	Yes	No
Fewer than 150 users were reached in Belgium, suggesting that engagement levels were likely even lower.		
Does the incident harm/criticise/attack the core values of Western societies?	Yes	No
Does the incident harm/criticise/attack the core procedures of Western societies?	Yes	No
The incident appears to be purely financially motivated and does not directly tackle democratic values or institutional procedures.		
4. INFRINGEMENT		
Does the incident constitute a law violation ?	Yes	No
If yes, does it violate national regulations ?	Yes	No
The promotion of Titan Gel may constitute a misleading commercial practice under Articles VI.97 (misleading actions) and VI.99 (misleading omissions) of the <i>Belgian Code of Economic Law</i> , as it attributes unsubstantiated performance-enhancing effects to the product. Where such claims imply treatment of a dysfunction, they may also fall under the prohibited practices listed in Article VI.100 . These provisions implement the EU Unfair Commercial Practices Directive (2005/29/EC) into Belgian law.		

If yes, does it violate international regulations ?	Unclear	
<p>The promotion of Titan Gel may also raise concerns under the <i>Digital Services Act</i> (DSA), in particular with regard to systemic risks linked to public health and consumer protection. Article 34 of the DSA explicitly requires Very Large Online Platforms (VLOPs) to assess systemic risks stemming from the design and functioning of their services, including the dissemination of misleading or harmful health-related content. While the single incident analysed here does not in itself allow for a conclusive finding of a violation, the broader investigation by Reset Tech documents large-scale, coordinated deceptive health advertising infrastructures operating across Meta and Google. Taken together, these findings provide strong indications of systemic risks that were not adequately mitigated, potentially amounting to non-compliance with Articles 34 and 35 DSA at the campaign level.</p> <p>Furthermore, Article 26 on advertising transparency requires platforms to ensure that users can clearly identify the advertiser and the entity on whose behalf an advertisement is displayed. In this case, a discrepancy is observed between the page identity (“Beautyfull Strenght”) and the declared advertiser and payer (“BodyInUnity”), which may hinder users’ ability to accurately identify the source of the ad. Finally, Article 14 obliges platforms to clearly define and consistently enforce their terms and conditions, including policies on misleading advertising and harmful commercial content.</p>		
If not, does it constitute a harmful activity?	Yes	No
<p>The incident may be considered harmful, as it exposes users to unproven health claims, potential financial exploitation, and broader risks associated with deceptive advertising ecosystems.</p>		
If not, does it violate the platform’s Terms of Service ?	Yes	No
<p>The incident may breach Meta’s “Unacceptable business practices in advertising,” which prohibits scams, potential inauthentic behaviour, and the use of deceptive or exaggerated claims about a product’s health-related benefits. Additionally, it may infringe the rules on “Fraud, scams, and deceptive practices,” notably through the use of clickbait tactics in a health-related context. Finally, the advertising appears to include sexually suggestive imagery, which is against “Meta’s adult nudity & sexual activity advertising policy”.</p>		
<p>FINAL ASSESSMENT</p> <ul style="list-style-type: none"> ● Medium certainty: Several of the conditions are met and supported by evidence. The investigator strongly believes the incident is FIMI, but there is not enough evidence to confirm it. 		
<p>B. SINGLE INCIDENT OF PART OF A CAMPAIGN?</p>		
Does the incident show evidence of coordination?	Unclear	
See Part I.2.3		
Does the single incident show evidence of coordination among foreign actors?	Yes	No

If yes, this is a FIMI incident		
Do multiple incidents show evidence of coordination among each other? If yes, this is a FIMI campaign	Unclear	
The one incident considered is linked to one advertiser located in Vietnam. However, other ads use similar sexually suggestive visuals to advertise Titan Gel from pages managed in the United States or lacking basic information regarding the advertiser's location. This pattern suggests the existence of a broader, cross-border deceptive advertising ecosystem employing similar tactics, although available evidence does not allow for confirming coordinated activity between the identified actors.		
FINAL ASSESSMENT <ul style="list-style-type: none"> • Single incident: In the absence of sufficient evidence linking the case to a broader FIMI campaign, the incident is most cautiously assessed as an isolated occurrence. 		

Part 2. Checklist for (systemic) violations

Incident ID	When was the incident created and registered ?		
	The campaign on Meta platforms (Facebook, Instagram, Audience Network, Messenger, and Threads), ran on 8-12 October 2025.		
Assessing the violation	Does the incident constitute a violation ?	Yes	No
Assessing the type of violation	If yes, is it a violation of national or international/EU law ?	Yes	No
	If yes, is it a violation of the platform's Terms of Service ?	Yes	No
	See Part I.4		
Assessing systematicity [inaction]	Are you aware of platform inaction regarding the incident?	Yes	No
	The ad was not removed and ran on multiple Meta platforms (Facebook, Instagram, Audience Network, Messenger, and Threads).		
Assessing systematicity [inconsistency]	Are you aware of platform inconsistency regarding the incident?	Yes	No
	Although there is no information regarding the specific incident, the advertiser ran more than one thousand ads according to the Meta Ad Library, promoting various health-related products. Some ads were found in violation of Meta's Advertising Standards, but there is no way of knowing what they contained.		

Assessing systematicity [recurrence]	Are you aware of the same/a similar incident occurring on the platform?	Yes	No
	The same advertiser ran various ads with the same copy as the incident considered. Moreover, other advertisers promoted Titan Gel, which is part of a long list of health-related products advertised by scam networks described in Reset Tech's investigation.		

Part 3. Checklist for countermeasures

A. COUNTERMEASURES IN PLACE		
1. STAKEHOLDERS INVOLVED		
Who has taken action (e.g., researchers, platform, victims, etc.)		
With regard to the specific incident, there is no evidence of any action taken and the advertisement remained active for its full duration. In other cases, platforms removed some individual advertisements, while health regulators and consumer protection organisations issued warnings against specific products. However, in instances where ads were removed, there is limited transparency regarding the reasons. It is therefore possible that such actions were triggered by user reports rather than proactive platform enforcement.		
2. ACTION TAKEN		
Were they exposure -related countermeasures?	Yes	No
Although the specific incident is not explicitly mentioned, Reset Tech's report documented the broader network of deceptive ads, including the promotion of Titan Gel.		
Were they community engagement -related countermeasures?	Yes	No
With regard to the specific incident, there is no evidence of any action taken.		
Were they distribution -related countermeasures?	Yes	No
With regard to the specific incident, there is no evidence of any distribution-related action taken and the ad circulated on Facebook, Instagram, Audience Network, Messenger, and Threads.		
Were they infrastructure -related countermeasures?	Yes	No
With regard to the specific incident, there is no evidence of any infrastructure-related action taken. At the broader network level, while sometimes single ads were removed, the whole infrastructure remained in place.		

Were they sanctions and legal -related countermeasures?	Yes	No
No sanctions or formal legal countermeasures were taken in relation to the specific incident or the broader campaigns.		
Were they media literacy -related countermeasures?	Yes	No
No media literacy-related countermeasures were identified in relation to this case.		
3. IMPACT	Yes	No
Did the countermeasures raise awareness of the incident?	Yes	No
The report, supported by media amplification , may have contributed to raising awareness of the phenomenon.		
Did they impact the threat actor capabilities to produce/distribute disinformation?	Yes	No
Ad takedowns observed in some cases left the broader network infrastructure intact.		
Did they trigger other actions by the defender community or threat actor(s)?	Yes	No
There is no evidence of further actions by the defender community.		
Did they reinforce the attribution of the incident?	Yes	No
The report may support attribution at a later stage, but at present it does not provide sufficient evidence to do so.		
Did they deter the threat actor(s)?	Yes	No
The threat actors – including the incident’s advertiser – continue to promote scam ads on Meta.		
4. LEGAL GROUNDS		
Are the countermeasures based on national law, international law, or platform Terms of Service ?	Yes	No
No legal countermeasures were taken with regard to the specific incident. However, in some cases ads by the same advertiser were removed based on violations of Meta’s Advertising Standards.		
B. POTENTIAL ADDITIONAL COUNTERMEASURES		
Is there anything more that could be done to stop/mitigate the incident?		

Yes, there are several countermeasures that could have prevented or mitigated the incident, including stronger advertiser verification, proactive detection of deceptive health ads, enforcement of platforms health- and ad-related policies, and deplatforming of entire advertiser networks.

Conclusion

The incident examined in this assessment -the promotion of Titan Gel via a Facebook ad managed from Vietnam - does not, on the available evidence, constitute FIMI. The three core conditions are not all conclusively met: while foreign actor involvement is present and manipulative behaviour is evident, sufficient evidence of intentional political interference is lacking, and the strategic objective appears to be primarily financial rather than aimed at undermining democratic processes or institutions. The incident is therefore most cautiously assessed as an isolated occurrence within a broader deceptive commercial advertising ecosystem.

That said, this assessment does not mean the incident is inconsequential - and this points to one of the key practical contributions of the FIMI toolkit beyond its original scope.

Not all harmful influence incidents are FIMI. Yet the methodological infrastructure developed for FIMI detection is precisely the toolkit needed to identify, document, and respond to a much wider range of information threats, including commercially motivated deceptive advertising campaigns that operate through the same infrastructures and exploit the same platform vulnerabilities as state-sponsored influence operations. The Titan Gel case illustrates this well: the tactics employed (microtargeting, clickbait, opaque cross-border advertiser networks, fake expert content) are structurally identical to those used in documented FIMI campaigns, even if the underlying motivation is profit rather than political interference.

This case demonstrates that the FIMI toolkit has value beyond FIMI. Its checklists, legal mapping, and countermeasure frameworks are equally applicable - and equally needed - for assessing harmful influence campaigns that operate below the FIMI threshold, and for building the evidentiary basis for regulatory and platform accountability responses. The absence of a clear state actor does not diminish the harm; but it simply shifts the appropriate response from geopolitical attribution towards consumer protection enforcement, platform accountability and DSA compliance monitoring.