

CHECKLIST: AI LABELS FOR VIDEO ADS

AI Act Article 50, the Belgian advertising rules and the labels of Meta, TikTok and Google, per ad before publication

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Go through this list for each ad before you publish it. Status as of 27 September 2026. This is not legal advice: the European Commission itself calls its guidelines a first interpretation that it will revise ^[1].

1. IS YOUR AD A DEEPPFAKE?

Since 2 August 2026, you must visibly disclose a deepfake as AI content (AI Act, Article 50) ^[2]. AI used for the idea, script, storyboard or translation in principle requires no disclosure ^[3]. A label is needed if the answer to all four questions is yes ^[1]:

- ☐ **Resemblance:** does the image clearly resemble something or someone? It doesn't have to be identical.
- ☐ **Existing or plausible:** does it exist, or could it have existed? A realistic AI person who doesn't exist also counts.
- ☐ **Subject:** persons, objects, places, animals or events, so products, avatars and voices too.
- ☐ **False impression:** could the audience wrongly take it for real? Intent plays no role; context and audience do.

Situations according to the Commission's guidelines and the guideline of the Raad voor Reclame, the Belgian advertising council

SITUATION IN YOUR VIDEO AD	LABEL?	WHY
Your real product, animated or in an AI setting	Usually not	As long as it doesn't look different ^{[1][4]}
Colour correction, upscaling, 9:16 crop, passers-by removed	No	Standard editing ^{[1][4]}
Cartoon, talking animals, fantasy world	No	Unrealistic ^[1]
AI extras in the background	Usually not	As long as they don't carry the message ^[4]
An AI product image that looks nicer or better than the product	Yes, and cut it	Deepfake and misleading ^{[1][4]}
A realistic AI presenter or avatar	Yes	Avatars count as persons ^[1]
A synthetic influencer testing your product	Yes	No lighter rule for creative work ^[1]
A real person you make say or do something with AI	Yes	Plus prior consent ^{[1][4]}

SITUATION IN YOUR VIDEO AD	LABEL?	WHY
A voice clone of an existing person	Yes	The label gives no right to the voice ^[4]
An AI voice-over as a neutral narrator	Grey area	If in doubt, label ^[4]
A simulated news clip or a reconstruction	Yes	Example given by the Raad voor Reclame ^[4]

2. ARE YOU LABELLING CORRECTLY?

- ☐ The label is there from the first exposure, not hidden in a menu or in terms and conditions ^{[2][1]}.
- ☐ Online video: immediately visible and for at least 5 seconds; TV and connected TV: for the entire spot ^[4].
- ☐ Neutral text in the language of the ad, with a contrast of at least 4.5:1 ^[4].
- ☐ Clear of the buttons: in Reels, not in the top 14% or the bottom 35% ^[5].
- ☐ In the creative itself, so the label travels with it; the EU icon is allowed, but not required ^[6].

Label texts suggested by the Raad voor Reclame ^[4]

CONTENT	DUTCH	FRENCH
Video	"AI gegenereerde video" or "AI gewijzigde video"	« Vidéo générée par l'IA » or « Vidéo modifiée par l'IA »
Person	"AI gegenereerde persoon" or "AI gegenereerde gelijkenis"	« Personnage généré par l'IA »
Voice	"AI gegenereerde stem"	« Voix générée par l'IA »

3. DO YOU FOLLOW THE BELGIAN ADVERTISING RULES?

- ☐ Your product shows nothing it doesn't have or do: misleading stays misleading, even with a label ^[4].
- ☐ There is prior consent for every real person, voice or likeness ^[7], covering scope, duration, withdrawal and compensation ^[4].
- ☐ No AI "customer" sharing an experience: testimonials must be genuine and verifiable ^[7], and false consumer recommendations are on the blacklist ^[8].
- ☐ A virtual influencer with its own account carries "reclame" or "publiciteit" (Dutch for advertising), the brand name and the platform's disclosure option ^[7].

4. IS IT RIGHT ON EVERY PLATFORM?

- ☐ **Meta:** "AI info" is sometimes shown only behind the menu ^[9], and that doesn't count as a clear disclosure ^[1].

- ☐ **TikTok:** AIGC label or your own clear disclosure, otherwise rejected or restricted; no public figure without consent ^[10].
- ☐ **Google Ads:** the AI label setting for the EU is switched on, although it is no guarantee of compliance ^[11].
- ☐ **Other channels:** you label there yourself; a platform label only applies on that platform ^[1].

5. IS IT ARRANGED AND ON RECORD?

- ☐ The contract settles who assesses, who labels, text, position and duration, consents and platform settings ^[1].
- ☐ For each ad, you have kept a record of what was made with AI and why you did or didn't label; that is how you demonstrate compliance without the code of practice ^[12].

Fines go up to €15 million or 3% of worldwide annual turnover, for SMEs the lower of the two ^[1]. The Belgian regulator has not yet been designated ^[13]. This is not legal advice.

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