



Google LLC
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Google.com

October 15, 2021

The Honorable Jim Banks
House of Representatives
1713 Longworth House Office Building
Washington DC, 20510

The Honorable Doug Lamborn
House of Representatives
2371 Rayburn House Office Building
Washington DC, 20510

Dear Congressman Banks, Congressman Lamborn, and esteemed members of Congress,

Thank you for your letter dated September 16, 2021. We appreciate the opportunity to provide clarification on your inquiry on the disapproval of certain advertisements making abortion-reversal claims.

Google, like other platforms, has ads policies that govern the type of advertising content we allow through our platform. Those policies are put in place for many reasons, including to help ensure a brand-safe environment for our publisher and advertising partners, as well as to empower and protect users.

Our platforms have empowered a wide range of people and organizations from across the political spectrum, giving them voices and unprecedented ways to reach their audiences. We provide ads to a wide range of publishers with a variety of viewpoints.

We approach our work without political bias. To do otherwise would be contrary to both our business interests and our mission, which compels us to make information accessible to every type of person, no matter where they live or what they believe. Additionally, we have robust controls to prevent the possibility of employee interference with our products, and we design our products to serve all users. We will continue to design our products and enforce our policies with extraordinary care to serve our mission without political bias.

Our policies do not permit ads with [harmful health claims](#). Under our [misrepresentation policy](#), we do not allow unreliable claims, including making inaccurate claims or claims that entice the user with an improbable result (even if this result is possible) as the likely outcome a user can expect. We rely on external, expert consensus to guide us in this regard, often from agencies such as the Food and Drug Administration, the Department of Health and Human Services, the Centers for Disease Control, prominent medical specialty societies, and others. In this case, the [American College of Obstetricians and Gynecologists](#) concluded that abortion reversal treatments “are not based on science and do not meet clinical standards.”

Our policies are designed to protect users from harm. They do not distinguish between ads promoting different positions on abortion. Advertisers are allowed to offer either abortion or abortion-alternative services. More information on this policy is included below.

Live Action is a current Google Advertiser. Like all advertisers, Live Action is subject to our advertising policies, including the [harmful health claims policy](#) and the [abortion certification](#) and disclosure advertising policy. Like all advertisers, Live Action is welcome to appeal any decisions they believe may have been made in error. Live Action's other ads continue to run, and they continue to be eligible to promote their perspectives and services as long as the ads do not violate Google's policies.

As discussed above, some of Live Action's advertisements were removed for violating Google ads policies. We offer the option for any user to [report an ad](#) they may find to be inappropriate or policy-violating. Once an ad is reported, the request is reviewed according to our [advertising guidelines](#), and if appropriate, action is taken on the ad.

Our abortion certification and disclosure advertising policy

In the United States, the United Kingdom, and Ireland, advertisers must complete our [abortion certification](#)—verifying whether they do or do not provide abortions—in order to run ads targeted to keywords or queries related to seeking information about getting an abortion. The sole purpose of this certification is to provide transparency to our users. Google takes no position on the viewpoint of, or services provided by, advertisers, so long as they comply with our policies. Once a certification application is submitted, it is reviewed to confirm the information provided in the application and, after review, the advertiser is then certified as an advertiser that

either “provides abortions” or “does not provide abortions” and is notified of their certification status. If for any reason an advertiser is not approved for the certification requested, they have the opportunity to appeal and may submit additional documentation or information to confirm their requested certification status.

Depending on how an advertiser is certified, Google will automatically generate one of the following in-ad disclosures for their abortion product or service ads: “Provides abortions” or “Does not provide abortions.” The disclosures will show on all Search ad formats and help ensure that these ads transparently provide basic information users need to make their own decisions. Once certified, an advertiser can immediately start running ads using keywords related to seeking information about getting an abortion, and Google will automatically generate the appropriate in-ad disclosure.

“Provides abortions”: An advertiser is considered an advertiser that “provides abortions” if they provide abortions at their own facilities. Hospitals, clinics (both abortion clinics and non-specialized clinics), or physician’s offices where abortions are performed are considered advertisers that provide abortions.

“Does not provide abortions”: An advertiser is considered an advertiser that “does not provide abortions” if they do not provide abortions at their own facilities. This may include organizations that provide pregnancy tests, ultrasounds, abortion counseling, general abortion information, abortion referrals, or that otherwise serve pregnant women but do not provide abortions. For the purposes of abortion advertiser certification and disclosure policy requirements, this may also include advertisers promoting non-service-based abortion content—for example, books about abortion or perspectives on abortion.

An advertiser’s certification may be removed if at any point their account does not meet policy requirements. In addition, [concealing or misstating information](#) about the business, product, or service an advertiser is promoting is not allowed and may subject their account to suspension.

The certification is applied regardless of the advertiser’s position on abortion. All advertisers, across the political spectrum, follow the same process and policies, which we enforce consistently without exceptions.

Thank you as well for the question about Mifepristone. In accordance with our [policy on healthcare and medicines](#), Mifepristone is one of many [prescription drugs](#) that are monitored in Google Ads. We have several policies that apply to advertisements for prescription drugs. For example, certain advertisers—such as online pharmacies, pharmaceutical manufacturers, and others looking to use prescription drug terms in ad text or landing pages or health insurance advertisers in the United States—need to be certified with Google in order to advertise. If an advertiser adheres to country-specific requirements, they can [apply for accreditation](#) before advertising prescription drugs.

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Thank you for the opportunity to correct any misunderstanding about advertisements from Live Action.

Sincerely,



Mark Isakowitz
Vice President
Government Affairs and Public Policy, US and Canada