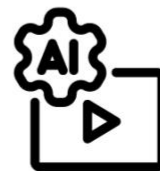


## **Brief on**

# **ASCI's Guidelines for Responsible Labelling of Synthetically Generated Content in Advertising**

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## Insight Brief on ASCI's Guidelines for Responsible Labelling of Synthetically Generated Content in Advertising

In September 2026, the Advertising Standards Council of India ("ASCI") released the [Guidelines for Responsible Labelling of Synthetically Generated Content in Advertising](#) ("Final Guidelines"), requiring advertisers to disclose the use of synthetically generated content ("SGC") and specifying where this use is prohibited. The Final Guidelines follow stakeholder consultations on the [draft framework](#) released in May 2026 ("Draft Guidelines") and come into effect three months after publication.

### Prohibited Content

Advertisements that are illegal, infringe on rights, contain misleading claims, or violate the [Code for Self-Regulation of Advertising Content in India](#) ("ASCI Code") remain prohibited, even if they include an artificial intelligence ("AI") label. This includes fabricating endorsements or testimonials; exaggerating product results or features in misleading ways through synthetic representations; representing non-existent locations or settings as real to mislead consumers; using unauthorized copyrighted work; and using deepfakes or an individual's likeness without consent.

### Mandatory Labeling Required

Labeling is mandatory where SGC materially influences consumer decisions, and the absence of disclosure could mislead consumers, including the use of synthetically generated influencers and ambassadors; replication of a real person's likeness or voice with consent for personalized messaging; fabricated events or settings that may affect consumers' understanding of the advertised product or service; demonstrations regarding products that do not currently exist; SGC-generated sound effects that are highly relevant to a product's core features such as headphones; and paid or sponsored AI-generated product suggestions, which must specifically be labelled "Sponsored by [Brand]."

### No Labeling Required

Disclosure is not required where SGC has no material impact on a consumer's ability to make an informed choice, such as routine editing, like color correction, light adjustment, noise reduction, and minor blemish removal; decorative or ambient elements; obvious fantastical effects; administrative and text-based uses, such as generating advertising copy; and accessibility applications, including subtitles, translations, and accurate audio descriptions.

### Disclosure Labels and Execution

Where disclosure is required, brands may use labels such as "Audio/Video created using AI" or "Audio/Video enhanced using AI", including labels provided by advertising platforms. Brands may also use alternative labels that accurately inform consumers about the nature of the synthetic content. Disclosures should follow the ASCI Code's guidelines on disclaimers, wherever applicable.

## Difference between the Draft Guidelines and Final Guidelines

| Issue                                  | Draft Guidelines                                                                                                                                                                                                                                                                                                             | Final Guidelines                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Definition of SGC</b>               | Covered content that is artificially created, modified, or materially altered to appear authentic, including deepfakes, AI voices, and synthetic spokespersons.                                                                                                                                                              | Expanded and more detailed definition covering content that is originated, generated, modified, or materially altered using a computer resource and likely to be perceived as real or true.                                                                                                                                                                                                                                     |
| <b>Assessment Criteria</b>             | Two assessment questions focused on whether AI use influences purchase decisions and whether absence of disclosure would mislead consumers.                                                                                                                                                                                  | Expanded to three questions, specifically assessing whether SGC is central to the communication and whether it may mislead on claims, benefits, or performance.                                                                                                                                                                                                                                                                 |
| <b>Prohibited Content</b>              | Included fabricated endorsements, exaggerated claims, fake locations, unauthorized deepfakes, and AI-generated authority figures, such as fake doctors.                                                                                                                                                                      | Retained most prohibitions but removed the specific example of fictional authority figures and added more detail on misleading endorsements and exaggerated results.                                                                                                                                                                                                                                                            |
| <b>Mandatory Labelling</b>             | Required disclosure where AI-generated or manipulated content could materially influence consumer perception, including AI influencers, synthetic spokespersons, replicated likenesses, realistic but non-existent events or settings, non-existent products, exaggerated sensory effects, and sponsored AI recommendations. | Retains the disclosure requirement for material uses of SGC but adopts a more principle-based approach, linking labeling to the risk that consumers will mistake synthetic content for authentic content. The final guidelines also clarify acceptable disclosure mechanisms, including platform-provided labels and advertiser disclosures, while retaining specific disclosure requirements for sponsored AI recommendations. |
| <b>Low-Risk or No Labeling Content</b> | Exempted minor edits, decorative backgrounds, fantastical elements, and administrative/text uses.                                                                                                                                                                                                                            | Expanded exemptions to include formatting, copy refinement, voice modulation not intended to mislead, and accessibility uses such as subtitles, captions, translations, and audio descriptions.                                                                                                                                                                                                                                 |
| <b>Disclosure Labels</b>               | Suggested labels such as “Audio/Video created using AI” or “enhanced using AI.”                                                                                                                                                                                                                                              | Clarified that brands may use platform-provided labels or their own labels and expressly retained the “Sponsored by [Brand]” requirement for sponsored AI recommendations.                                                                                                                                                                                                                                                      |