

Creator Earns Commission on TikTok: New Guidance on Effective Influencer Disclosures

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by Fara Sunderji

Earlier this year, we blogged about [effective influencer disclosures on Instagram](#). Our attention is now on TikTok with the help of a recent decision from the National Advertising Division. On October 13, 2025, the [NAD released its decision](#) in a challenge brought by Niagen Bioscience against Reus Research regarding its Cata-Kor NAD+ Core and Cata-Kor NAD+ Advanced supplements. The challenge addressed numerous advertising issues, including comparative claims, efficacy claims, establishment claims, health and safety claims and performance claims, but what really caught our eye was the NAD's ruling on influencer endorsements – specifically on TikTok.

Most brands are well aware that the FTC requires influencers to disclose their connection to a brand and that brands are generally responsible for ensuring compliance with the [FTC's Endorsement Guides](#). We've been hearing for years that #sponsored or #ad are the gold standards for disclosure. The FTC has also made clear through its [FAQs](#) that built-in social media tools are not necessarily effective for influencers to disclose their material connection to a brand. However, until now, the FTC has not specifically addressed any current or former built-in platform tools on the various popular social media websites.

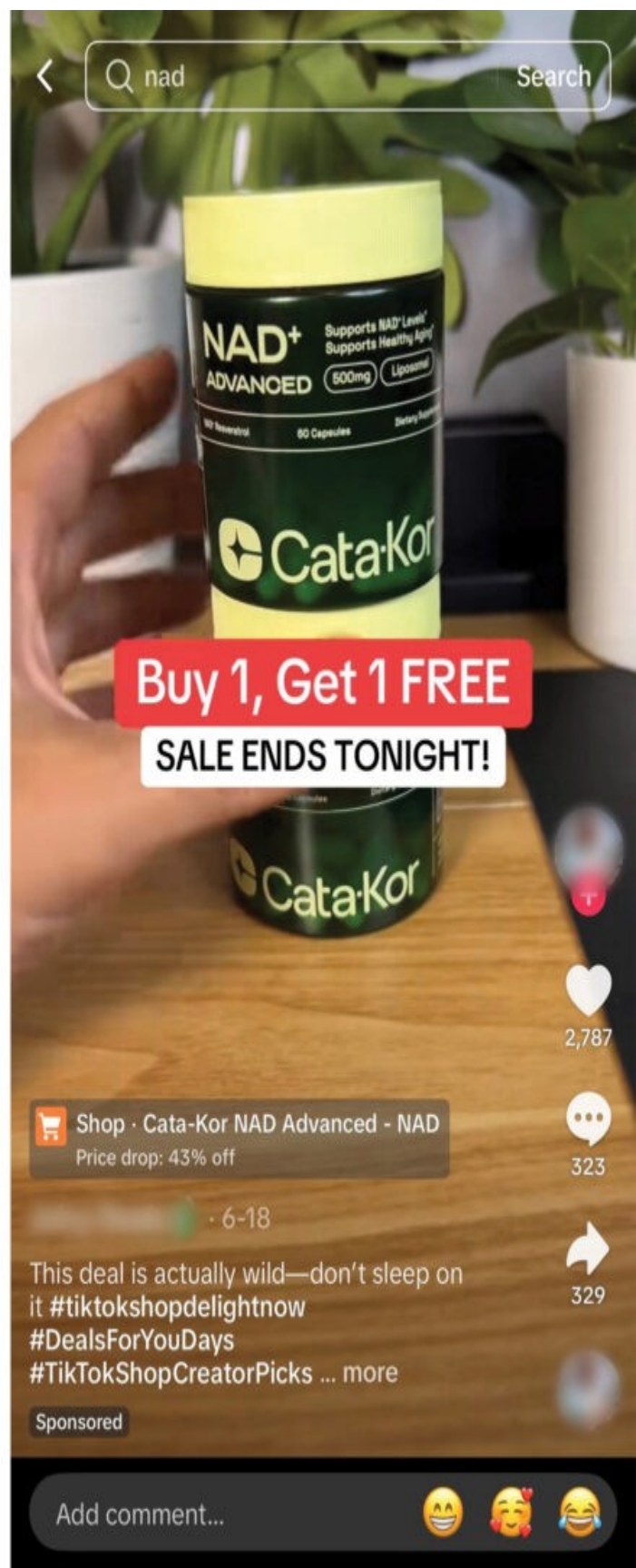
Lucky for us, this case gave the NAD the opportunity to review the built-in tool on TikTok and issue its opinion. If you are not familiar, below is what the "disclosures" look like when influencers use the built-in platform tool. All the way at the bottom of the screenshots – labels are automatically applied that state "*creator earns commission*" and "*sponsored*." While the NAD found that the message "*creator earns commission*" is clear and its appearance (font color vs the background) is generally conspicuous, they concluded it is too small and could easily be missed. Unsurprisingly, the NAD also noted that if an influencer is promoting a brand audibly, then the disclosure should also be made verbally.

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For their part, the advertiser noted that it has recently updated its guidelines to require its

