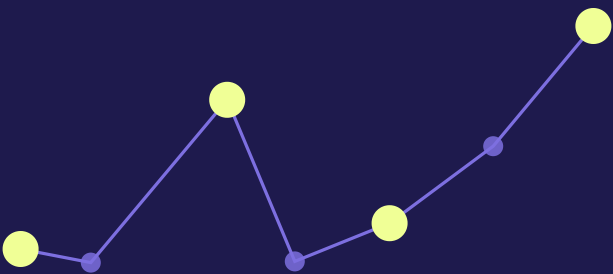


When Influence Becomes Public Record

Why public affairs, advocacy and strategic communications now need disclosure architecture



In this briefing

Why public affairs, advocacy and strategic communications now need disclosure architecture

·	Executive Brief
01	Why This Clears the Threshold for a New Briefing
02	What the Act Does — and What It Does Not Mean
03	Communications Is Inside the Regulated Activity
04	The Artefact91 Influence Transparency Operating System
05	The Public Registry Changes Reputation Risk
06	Registration Is Not an Admission of Wrongdoing
07	The Cross-Border Signal
08	The Artefact91 Public Record Test
09	Three Failure Modes
10	A 30-Day Readiness Sprint
11	Implications for Agencies
12	Implications for Institutions and Advocacy Organizations
13	The Artefact91 Decision Rule
14	What Leaders Should Do Now
·	Sources & Research Base
·	Method Note

HOW TO READ IT

A briefing, not a report: the executive brief carries the argument, the numbered sections carry the evidence and the method, and every external figure is attributed to its source.

ARTEFACT91 BRIEFING

Executive Brief

Public affairs is acquiring a new operating layer: the influence relationship itself can become public data.

Canada's Foreign Influence Transparency and Accountability Act (FITAA) came into force on August 4, 2026. The first registrations appeared in the public registry in September, and arrangements that began before August 4 and remain active face an October 3, 2026 registration deadline. The Office of the Foreign Influence Commissioner has also begun applying the regime in live political contexts, including a September 22 statement reminding participants in influence activity around the Alberta referendum of possible registration obligations. [1][2][3]

This matters to communicators because Canada's guidance expressly includes communicating with public office holders, disseminating information—including through social media—and certain services intended to influence Canadian political or governmental processes when they are undertaken under the direction of, or in association with, a foreign principal. The Commissioner's own example includes a communications manager distributing information through a company newsletter as part of an arrangement. [4]

The significance is not that foreign engagement is suspect. Transparent foreign influence is lawful and routine in democratic systems. The new risk is that an institution may run a sophisticated public-affairs, advocacy or campaign operation while treating disclosure as a late-stage legal filing instead of part of campaign design.

Artefact91's position:

ARTEFACT91 POSITION

DISCLOSURE IS NOW PART OF THE COMMUNICATIONS ARCHITECTURE.

A public register changes the information environment. Journalists, political opponents, watchdogs, employees, partners and communities can compare what an organization says publicly with what has been registered about who directed, coordinated or supported the activity. The communications task is therefore not only compliance. It is making the influence relationship legible, accurate and defensible before others narrate it first.

SECTION 01

Why This Clears the Threshold for a New Briefing

Artefact91 Briefing 12 examined organized influence operations. Briefing 14 examined manufactured stakeholder voice. Briefing 17 examined synthetic-media disclosure in political campaigns. Those briefs focus on deception, authenticity and media provenance.

This development is different.

FITAA concerns transparent influence: legitimate activity that may be lawful precisely because the relationship is disclosed.

The current inflection point is concrete:

- the Canadian regime is now in force
- the public registry is live
- pre-existing active arrangements face an October 3 deadline
- the Commissioner has begun proactively contacting organizations that may have obligations in live political processes; and
- communications activity itself appears explicitly within official guidance. [1][2][3][4]

The operational shift is:

ARTEFACT91 FRAMEWORK

PUBLIC AFFAIRS COMPLIANCE → PUBLIC AFFAIRS DISCLOSURE DESIGN

and:

ARTEFACT91 FRAMEWORK

“WHO ARE WE TRYING TO PERSUADE?” → “WHO WILL BE ABLE TO SEE WHO IS BEHIND THE PERSUASION?”

SECTION 02

What the Act Does — and What It Does Not Mean

The law should not be flattened into “foreign client equals registration.”

The Commissioner’s guidance says an arrangement under FITAA requires three elements:

- 1 a person or organization acts under the direction of, or in association with, a foreign principal;
- 2 the person undertakes one or more influence activities; and
- 3 those activities relate to a Canadian political or governmental process. [5]

The Commissioner also stresses that an arrangement may be formal or informal, written or unwritten, and that direction can include input or approval on messaging, strategy or timing. “Association” can include aligning, coordinating or sequencing activities or messaging. At the same time, shared political views, a professional relationship, a meeting, cultural exchange, ideological alignment, common advocacy goals or parallel action do not by themselves establish an arrangement. [5]

The definition of “foreign principal” is also specific. It is broader than a foreign government, but an organization is not a foreign principal merely because it is based outside Canada, receives foreign funding or has non-Canadian participants. The official guidance points to foreign states, foreign powers, state-controlled entities and entities effectively controlled by another foreign principal, among other categories. [6]

That distinction matters.

The strategic communications risk is highest when organizations simplify the law in one of two directions:

UNDER-READING: “We are not lobbyists, so this cannot apply.”

OVER-READING: “Any foreign-funded advocacy is foreign influence.”

Both are unsafe. The first can miss an obligation. The second can unfairly stigmatize legitimate civil-society, research, commercial or international work.

SECTION 03

Communications Is Inside the Regulated Activity

FITAA’s influence-activity guidance is unusually relevant to communications leaders.

It identifies three broad categories:

- communicating with a public office holder
- communicating or disseminating information; and
- distributing money or items of value, or providing a service or use of a facility. [4]

Examples include lobbying a legislator on a bill, conducting a social-media campaign aimed at Canadians about relations with a foreign state, publishing an article or video about voting in a referendum, and get-out-the-vote activity supporting a foreign principal's preferred candidate. [4]

The guidance also says anyone carrying out influence activities as part of the arrangement must be included in the registration. Its communications example is direct: where an organization tells its communications manager to disseminate information through a company newsletter as part of an arrangement, the manager is identified in the registration. [4]

This creates a practical implication for agencies and in-house teams:

ARTEFACT91 POSITION

THE CAMPAIGN ORG CHART CAN BECOME A DISCLOSURE MAP.

Strategy leads, account directors, public-affairs practitioners, media advisers, spokespeople, social-media leads and subcontractors may need to be mapped against the actual activity rather than treated as invisible production infrastructure.

That is a governance problem before it is a filing problem.

SECTION 04

The Artefact91 Influence Transparency Operating System

Artefact91 recommends a seven-stage operating system for public-affairs, advocacy and campaign work with a possible foreign-influence nexus:

ARTEFACT91 FRAMEWORK

PRINCIPAL → ARRANGEMENT → PROCESS → ACTIVITY → PEOPLE → DISCLOSURE → UPDATE

Principal

Who is the client, partner, funder or coordinating entity? What is its legal and governance relationship to any foreign state, foreign power, political party, state-controlled enterprise or other potentially relevant foreign principal?

Do not infer from nationality alone. Document the basis for the assessment.

Arrangement

What is the actual relationship?

Who sets objectives?

Who approves messaging?

Who controls timing?

Who supplies resources?

Who coordinates channels?

Who can veto or alter the strategy?

The contract is evidence, but it may not be the whole arrangement.

Process

Which Canadian political or governmental process could the work affect?

The Commissioner's guidance identifies processes such as legislation, policy or program development, decisions by public office holders or government bodies, elections, referendums and candidate or platform development. [7]

Activity

What will actually happen?

Separate:

- direct government engagement
- public campaigns
- media relations
- paid advertising
- social media
- influencer or creator activation
- stakeholder mobilization
- events
- research dissemination
- coalition activity
- community outreach
- election or referendum activity.

The legal and reputational meaning may differ by activity.

People

Identify who carries out the activity, not merely who invoices for it.

Map employees, agency staff, partners, spokespersons and relevant subcontractors against each workstream.

Disclosure

Where registration is required, treat the filing as a public-facing artifact.

Ask whether the wording accurately explains the relationship, objective and activity without euphemism or unnecessary alarm.

Update

Canada requires changes to registered information to be updated within 14 calendar days. [8]

A campaign that changes strategy, personnel, target audiences or activities may therefore create a disclosure-maintenance task, not a one-time form submission.

SECTION 05

The Public Registry Changes Reputation Risk

A public registry has a second life outside the regulator.

Once information is searchable, it can be:

- cited in journalism
- used in parliamentary or legislative debate
- included in opposition research
- incorporated into activist campaigns
- compared with lobbying records
- compared with advertising libraries
- cross-referenced against procurement, donations or funding disclosures
- surfaced by search engines and AI assistants
- interpreted by stakeholders without the context the organization assumes is obvious.

The primary reputation risk is therefore not registration itself.

It is discrepancy.

A discrepancy can emerge when:

- the registry describes an influence activity more clearly than the organization's own public materials
- a campaign presents itself as spontaneous while records show coordinated direction
- a spokesperson claims independence that is difficult to reconcile with the arrangement
- a coalition member uses different language about who funded or directed the work
- an organization registers late and the delay becomes the story
- staff or subcontractors are surprised to learn they were named or should have been mapped
- the legal filing is technically correct but written in language that stakeholders interpret as evasive.

The communications objective should be:

ARTEFACT91 POSITION

NO SURPRISES BETWEEN THE PUBLIC STORY AND THE PUBLIC RECORD.

SECTION 06

Registration Is Not an Admission of Wrongdoing

This principle should be explicit in every crisis and media plan.

The Canadian registry says arrangements listed there are transparent and in compliance with the Act. [9] Australia's transparency regime similarly emphasizes that foreign influence is lawful when open and transparent, and its government warns that a transparency notice does not necessarily imply wrongdoing. [10][11]

That distinction matters because the language of "foreign influence" can easily be weaponized.

Organizations should prepare a short explanatory line before registration becomes an issue:

- what the relationship is
- why the organization is involved
- what activity is being conducted
- what has been disclosed
- what governance protects institutional independence where relevant; and
- where the public can verify the record.

The purpose is not to sanitize the relationship. It is to prevent transparency infrastructure from being misrepresented as evidence of misconduct.

SECTION 07

The Cross-Border Signal

Canada is not operating alone.

The United Kingdom's Foreign Influence Registration Scheme has been in force since July 2025. Its political-influence tier requires registration in defined circumstances where activity is undertaken at the direction of a foreign power, and the UK publishes registration information. [12]

Australia's Foreign Influence Transparency Scheme has operated since 2018. It expressly lists parliamentary lobbying, general political lobbying, communications activity and disbursement activity among registrable categories when the statutory conditions are met. [10]

The United States has long operated the Foreign Agents Registration Act. FARA requires certain agents of foreign principals engaged in political or other specified activities to make public disclosures, and the statute expressly defines “public-relations counsel,” “publicity agent” and “political consultant.” [13][14] In September 2026, the U.S. Department of Justice issued a fresh public reminder that unregistered activity on behalf of foreign powers can create civil or criminal liability. [15]

These regimes are not interchangeable. Definitions, exemptions, thresholds, filing duties and penalties differ materially.

But the strategic pattern is clear:

ARTEFACT91 POSITION

THE IDENTITY BEHIND INFLUENCE IS BECOMING A GOVERNANCE DATA POINT.

For global communications firms, NGOs, universities, trade associations, think tanks, companies and political advisers, jurisdiction-by-jurisdiction screening should become part of campaign intake.

SECTION 08

The Artefact91 Public Record Test

Before launching a potentially registrable campaign, ask:

- 1 If the registry entry appeared on the front page tomorrow, would our public explanation still be accurate?
- 2 Can we explain who initiated the work and who approves strategy or messaging?
- 3 Are funding, direction and coordination being described consistently across contracts, campaign materials and spokesperson lines?
- 4 Have we mapped every person and organization actually carrying out influence activities?
- 5 Could any “independent” voice reasonably be understood as coordinated once the arrangement is public?
- 6 Are coalition partners using the same factual description of the relationship?
- 7 Would an AI search assistant surface enough authoritative information to explain the registration accurately?
- 8 Are we prepared for opponents to use the term “foreign influence” without distinguishing transparent influence from covert interference?
- 9 Do we know who owns updates when scope, staff or tactics change?
- 10 Have legal and communications reviewed the same fact pattern?

If the answer to #10 is no, the organization has a governance gap.

SECTION 09

Three Failure Modes

Failure Mode 1 — Legal First, Comms Last

Counsel files correctly. Communications learns about the filing only when a journalist calls.

Result: technically compliant, operationally unprepared.

Failure Mode 2 — Comms First, Legal Last

A campaign team launches a coalition, creator program, public petition or media push without mapping direction, foreign-principal status or the governmental process being targeted.

Result: registration analysis happens after the public narrative is already fixed.

— Failure Mode 3 — Disclosure Without Context

The organization registers but never explains the relationship publicly.

Result: critics supply the meaning of the filing.

The solution is not over-communication.

It is synchronized governance.

— SECTION 10

A 30-Day Readiness Sprint

— Days 1–5 — Inventory

List active and planned work involving:

- foreign governments or subnational governments
- political parties or political movements outside Canada
- state-owned or state-controlled entities
- international coalitions
- foreign embassies, consulates or missions
- organizations whose governance may involve a relevant foreign principal
- advocacy affecting Canadian policy, legislation, regulation, public procurement, elections or referendums.

Do not assume an obligation from the list. Use it to trigger review.

— Days 6–10 — Map

For each matter, record:

- contracting entity
- beneficial or controlling relationships where relevant
- strategic decision-makers
- messaging approvers
- target political/governmental process
- influence activities
- personnel and subcontractors
- start date
- changes since launch.

— Days 11–15 — Test

Have qualified legal/compliance personnel assess whether the statutory elements and any exemptions apply.

Where uncertainty is material, use available official guidance or seek an advisory opinion from the relevant authority rather than inventing an internal interpretation.

— Days 16–20 — Align

Create one factual description that can support:

- registration
- media lines
- website disclosure where appropriate

- stakeholder Q&A
- internal briefing
- coalition guidance.

Days 21–25 — Simulate

Run three scenarios:

- a journalist calls after finding the registry entry
- an opponent posts the filing without context
- an employee or partner asks why their name or role appears.

Test speed, consistency and escalation.

Days 26–30 — Maintain

Assign an owner for:

- filing deadlines
- changes within the required update window
- campaign-scope changes
- personnel changes
- public-registry monitoring
- narrative and misinformation monitoring.

SECTION 11

Implications for Agencies

Agencies should add an influence-transparency screen at client intake.

At minimum, scopes involving public affairs, advocacy, campaigns, policy communications, coalition work, strategic media, creator activation or government-facing reputation work should capture:

- client governance and control
- foreign-principal screening
- jurisdiction
- political/governmental process
- message-approval rights
- media and public-distribution plans
- subcontractor roles
- disclosure responsibilities
- who pays for registration analysis
- who owns public explanation if the relationship becomes contentious.

The contract should also state that legal registration obligations cannot be assigned away by communications language.

“Independent campaign,” “coalition-led,” “third-party advocacy” and “community voice” are not governance structures. They are descriptions that must remain accurate after the underlying relationships are disclosed.

SECTION 12

Implications for Institutions and Advocacy Organizations

Organizations with legitimate international partnerships should resist two bad instincts.

The first is concealment.

If the relationship is registerable, opacity can create a larger reputation problem than the relationship itself.

The second is over-defensiveness.

A foreign partnership, international funding source or cross-border coalition is not inherently improper. The organization should explain governance facts precisely:

- who funds
- who directs
- who decides
- what remains independent
- what is being advocated
- what has been disclosed
- what legal regime applies.

Precision protects both accountability and legitimate civic participation.

SECTION 13

The Artefact91 Decision Rule

The emerging communications standard should be:

ARTEFACT91 FRAMEWORK

IDENTIFY → TEST → MAP → REGISTER → EXPLAIN → MONITOR → UPDATE

IDENTIFY the relationship before the campaign.

TEST the actual statutory elements.

MAP the activity and people.

REGISTER when required.

EXPLAIN the relationship accurately.

MONITOR how the public record is interpreted.

UPDATE both the filing and the communications plan as facts change.

The key insight is simple:

ARTEFACT91 POSITION

TRANSPARENCY IS NOT A FOOTNOTE TO INFLUENCE. IT IS NOW PART OF HOW INFLUENCE IS JUDGED.

SECTION 14

What Leaders Should Do Now

Executives, boards, general counsel and communications leaders should ask one immediate question:

ARTEFACT91 POSITION

DO WE KNOW WHICH OF OUR PUBLIC-AFFAIRS, ADVOCACY OR CAMPAIGN RELATIONSHIPS COULD BECOME PUBLIC REGISTRY DATA?

If the answer is uncertain, the next step is not a press release.

It is a joint legal–communications inventory.

The organizations best positioned for this environment will not merely comply. They will design campaigns whose public explanation remains credible after the underlying relationships are visible.

ARTEFACT91 BRIEFING

Sources & Research Base

- [1] Public Safety Canada. “Government of Canada establishes foreign influence registry.” August 4, 2026. <https://www.canada.ca/en/public-safety-canada/news/2026/08/government-of-canada-establishes-foreign-influence-registry.html>
- [2] Office of the Foreign Influence Commissioner of Canada. “Statement from Commissioner Boegman on the foreign influence registry.” September 16, 2026. <https://www.canada.ca/en/foreign-influence-commissioner/news/2026/09/statement-from-commissioner-boegman-on-the-foreign-influence-registry.html>
- [3] Office of the Foreign Influence Commissioner of Canada. “Statement from Commissioner Boegman regarding influence activities in the Alberta referendum.” September 22, 2026. <https://www.canada.ca/en/foreign-influence-commissioner/news/2026/09/statement-from-commissioner-boegman-regarding-influence-activities-in-the-alberta-referendum.html>
- [4] Office of the Foreign Influence Commissioner of Canada. “Interpretation bulletin: Influence activities.” Effective August 4, 2026. <https://www.canada.ca/en/foreign-influence-commissioner/foreign-influence-laws/interpretation-bulletin-influence-activities.html>
- [5] Office of the Foreign Influence Commissioner of Canada. “Interpretation bulletin: Entering into an arrangement.” Effective August 4, 2026. <https://www.canada.ca/en/foreign-influence-commissioner/foreign-influence-laws/interpretation-bulletins-arrangement.html>
- [6] Office of the Foreign Influence Commissioner of Canada. “Interpretation bulletin: What is a foreign principal.” Effective August 4, 2026. <https://www.canada.ca/en/foreign-influence-commissioner/foreign-influence-laws/interpretation-bulletins-foreign-principal.html>
- [7] Office of the Foreign Influence Commissioner of Canada. “Interpretation bulletin: Application to licensed legal professionals.” Effective August 4, 2026. <https://www.canada.ca/en/foreign-influence-commissioner/foreign-influence-laws/interpretation-bulletin-application-licensed-legal-professionals.html>
- [8] Office of the Foreign Influence Commissioner of Canada. “How to register.” <https://www.canada.ca/en/foreign-influence-commissioner/how-to-register.html>
- [9] Office of the Foreign Influence Commissioner of Canada. “Registry of foreign influence activities.” <https://www.canada.ca/en/foreign-influence-commissioner/registry.html>
- [10] Australian Attorney-General's Department. “Foreign Influence Transparency Scheme.” <https://www.ag.gov.au/integrity/foreign-influence-transparency-scheme>
- [11] Australian Attorney-General's Department. “Transparency Notices issued under the Foreign Influence Transparency Scheme.” <https://www.ag.gov.au/integrity/foreign-influence-transparency-scheme/transparency-notices>
- [12] UK Home Office. “Foreign Influence Registration Scheme.” <https://www.gov.uk/government/collections/foreign-influence-registration-scheme>
- [13] U.S. Department of Justice. “Foreign Agents Registration Act.” <https://www.justice.gov/nsd-fara>
- [14] U.S. Department of Justice. “FARA Index and Act.” <https://www.justice.gov/nsd-fara/fara-index-and-act>
- [15] U.S. Department of Justice. “Liability for Unregistered Foreign Agents.” September 16, 2026. <https://www.justice.gov/opa/pr/liability-unregistered-foreign-agents>

ARTEFACT91 BRIEFING

Method Note

This briefing synthesizes official laws, regulatory guidance, public statements and registries available as of October 1, 2026. It is a strategic communications and governance analysis, not legal advice. Registration obligations are fact-specific and vary by jurisdiction. Organizations should obtain qualified legal advice or regulator guidance where obligations are uncertain.