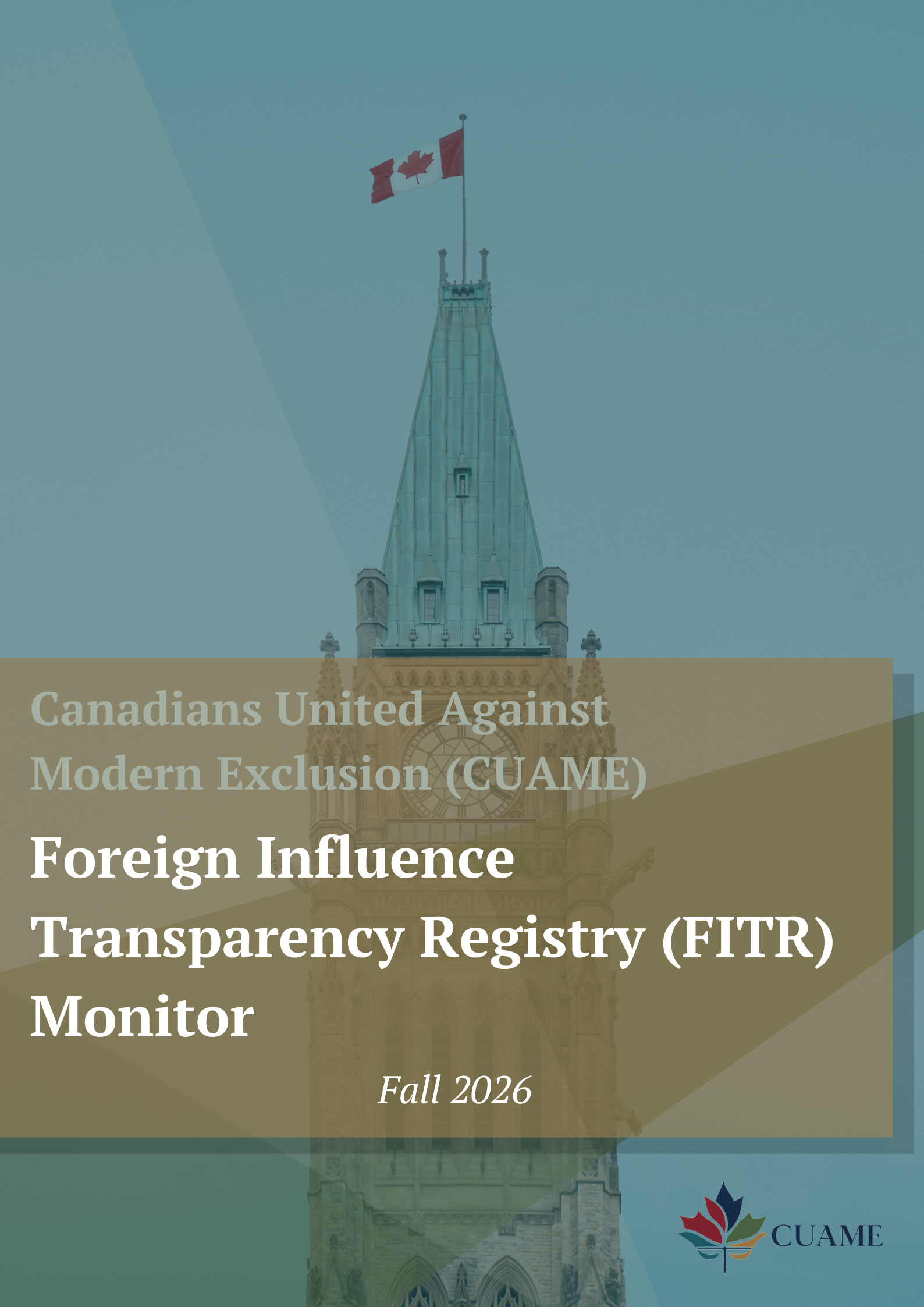


Canadians United Against Modern Exclusion (CUAME)

Foreign Influence Transparency Registry (FITR) Monitor

Fall 2026

CUAME

Welcome to the FITR Monitor

Canadians United Against Modern Exclusion (CUAME) is pleased to present the first issue of the Foreign Influence Transparency Registry (FITR) Report.

The goal of FITR Monitor is to track the implementation of the Foreign Influence Transparency Registry, presenting analysis and commentary to assess if the registry is meeting its objectives without harming the rights and civil liberties of Canadians, especially racialized groups. We will pay special attention to issues such as stigmatization against minority groups, infringement of Charter rights, and intended or unintended consequences of FITR that lead to discrimination and exclusion.

If you have any questions or would like to discuss your concerns about FITR, please contact us at fitrmonitor@cuame.ca

FITR Monitor Team, Canadians United Against Modern Exclusion (CUAME)

What's New

The Foreign Influence Transparency Registry (FITR) came into force in August 2026, following the passage of the Foreign Influence Transparency and Accountability Act (FITAA), in June 2024. The registry aims to increase transparency around foreign influence activities and respond to legitimate concerns about foreign interference in Canada. In response to widespread concerns about the implementation of FITR, CUAME is pleased to launch the FITR Monitor, which will track the registry's development, examine the nature and scope of registrants, how the registry is being enforced, and assess generally if the registry is meeting its objectives without harming the rights and civil liberties of Canadians, especially racialized groups. The FITR Monitor will be published quarterly. To subscribe, please send a message to fitrmonitor@cuame.ca

Since the registry was launched, the Office of the Foreign Influence Commissioner (OFIC) has focused on advising stakeholders on compliance questions, including releasing public bulletins and hosting events.

Last month, CUAME and Canada-China Focus (CCF, University of Victoria) welcomed Deputy Commissioner Deidre Pollard Bussey and Tamir Israel, Director of Privacy, Surveillance, and Technology Program at the Canadian Civil Liberties Association (CCLA) for a panel discussion on how the act will work and to address questions on the criteria for registration.

According to Commissioner Anton Boegman's testimony before a committee at the House of Commons, the OFIC expects to eventually have around 2400 registrants. However, at the time of his testimony, there were only five listings on the public registry. His full testimony can be read on the Standing Committee on Procedure and House Affairs website.

About FITR

The Foreign Influence Transparency Registry (FITR) requires the registration of individuals or organizations who have entered into arrangements with foreign principals to influence political processes in Canada.



Figure 1. Key milestones in the development and early implementation of the Foreign Influence Transparency Registry (FITR), June 2024 to October 2026.

Many legitimate activities, such as cross-cultural promotion or trade promotion, can be expected to appear on this registry. The OFIC is insistent that registration in itself is not in any way an indication of wrongdoing and that the registry should not be seen as a "blacklist".

However, early feedback from many potential registrants, especially among racialized communities, have raised precisely the concern that being listed on FITR could be perceived by the public negatively and lead to stigmatization. There is also concern about listings being misused by national security and law enforcement agencies.

Under the official criteria, registration is required only where all three of the following conditions are met:

a) They have an arrangement with a foreign principal

- a foreign principal includes a foreign power or state, a foreign entity (such as an organization or institution), a foreign economic entity, or an individual acting on their behalf

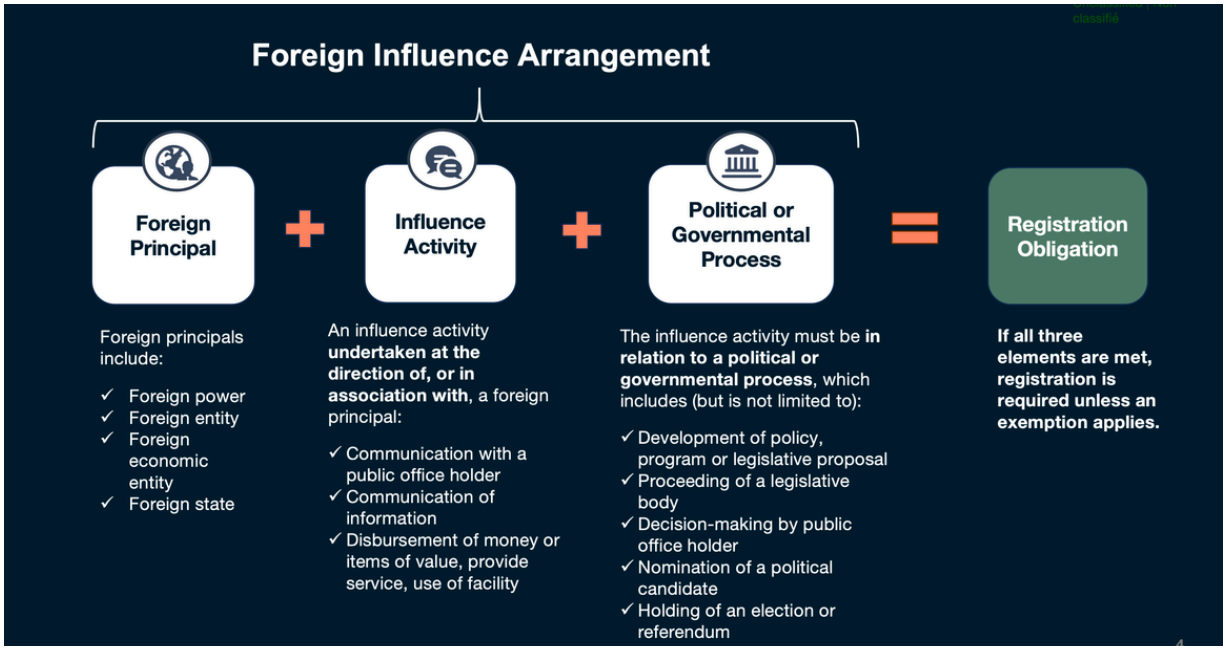
b) The goal of the arrangement is to influence a political or governmental process in Canada

- a political or governmental process can include a legislative proposal, election, referendum, or government contract at any level of government

c) The arrangement involves any of the following influence activities

- communicating with a public office holder, including elected officials and government employees at the federal, provincial/territorial or municipal levels
- communicating or disseminating information related to the political or government process to the public, including on social media
- providing money, services, use of facilities or items of value

This applies to all levels of government, but currently excludes indigenous governments.



Slide provided by Deputy Commissioner Bussey

Registration Update

Since the initial October 3rd, 2026, deadline to register ongoing foreign influence activities, the registry has only five listings. The Commissioner has suggested that there are as many as 50 additional potential listings that are currently being assessed for eligibility. These five registrations provide insight and raise questions about the types of activities that are captured by the act.

Two of the five registrants are honorary foreign consuls: Diana Catherine King, Honorary Consul of Denmark, and Gerald Chipeur, Honorary Consul of Korea. These registrations suggest that all honorary consuls in Canada, also have to register. The same may apply to individuals with comparable foreign affiliations.

Friends of Sinn Féin, an organization affiliated with the Irish political party Sinn Féin, is also registered. This suggests that organizations affiliated with foreign political parties can be considered as foreign principals, even if they are not directly part of a foreign government. By extension, comparable organizations, such as Democrats Abroad Canada or Republicans Overseas Canada, American political party organizations, and overseas auxiliary bodies and foundations of foreign political parties, regardless of whether they are formally part of a foreign government, could be subject to the same obligation.

The fourth registration pertains to an individual, Raquel Garbers, formerly an employee at the Department of National Defense, who declared that she was working with the US Department of State to host leadership/education events in Taiwan and Thailand. It is not clear what the "influence activity" was and how it pertains to a Canadian governmental or political process. This listing raises questions for other cases where an activity intended primarily for a foreign audience may "make reference" to Canadian policy and where Canadian officials may be incidental to such an activity.

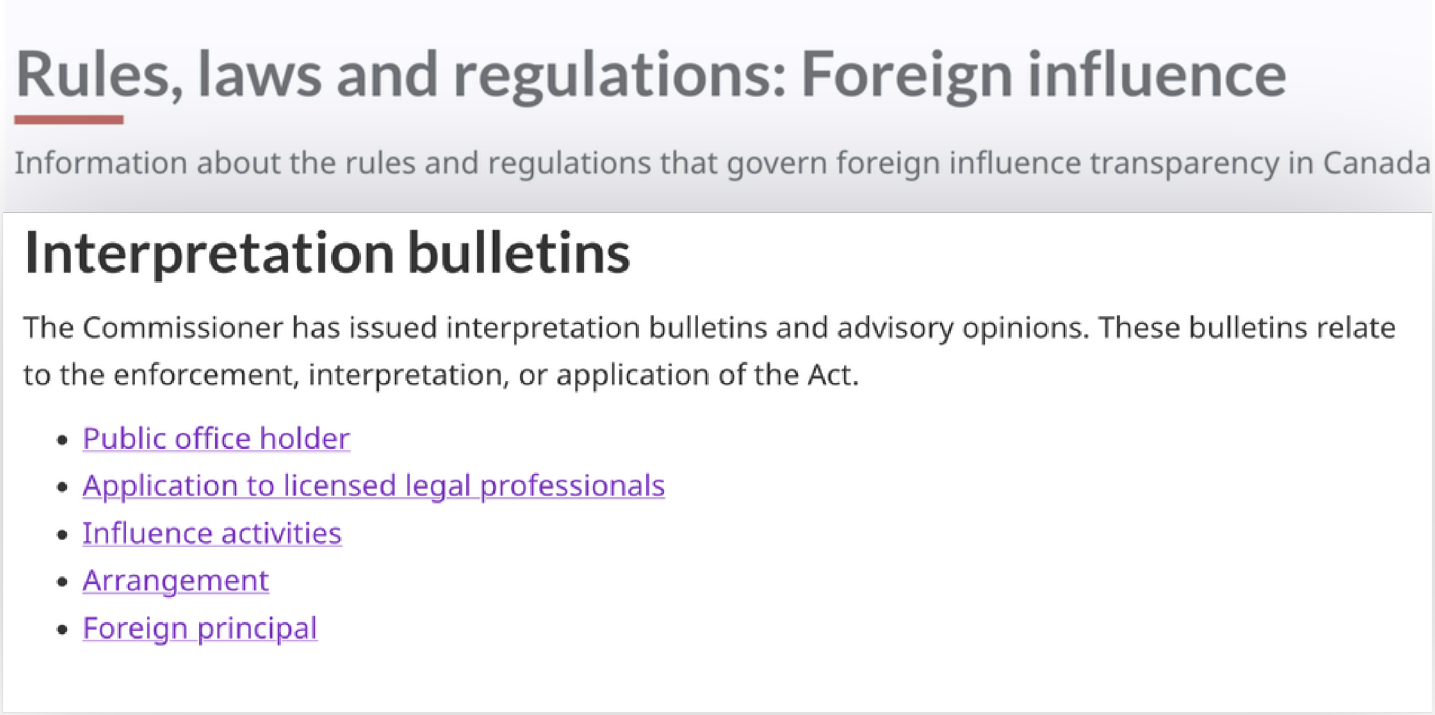
The fifth registrant, The Canada Files Media, demonstrates how media outlets may be subject to the act. The registrant was engaged by a foreign principal (CGTN Français) and disseminated information to the public — covering two of the three criteria.

However, the nature of the influence activity is unclear. The listing describes it as being "supportive of China's management of its domestic political affairs" but does not say how this affects a Canadian specific political or governmental process. This registration was briefly delisted due to a privacy breach but is back up on the registry. The Commissioner attributed the privacy breach to technical issues which he says his office is working to improve.

Of these five activities, two activities have concluded while the other three, some which date back to 2001, remain active.

OFIC Bulletins

The Office of the Foreign Influence Commissioner of Canada (OFIC) may periodically issue bulletins clarifying ambiguities in the criteria for registration with the FITR. On August 4th, 2026, the



OFIC Bulletin Webpage, sourced from OFIC

Commissioner published four bulletins clarifying the act: public office holder, influence activities, arrangement, foreign principal. A fifth bulletin advises the application of the act to legal professionals.

The status of the bulletins is, however, uncertain. Section 13(2) of FITAA states that "the advisory opinions and interpretation bulletins are not statutory instruments for the purposes of the Statutory Instruments Act and are not binding." Their legal weight therefore remains unclear.

Academics can expect a guidance document to be published on the website soon. A preliminary version of the guidance has already been distributed to some individuals, according to Deputy Commissioner Bussey's presentation at the CUAME and Canada-China Focus panel webinar. It was also shared at the webinar and can be found at CUAME's website.

Universities do not appear to have a common approach to registration. Many are still assessing the implications for their faculty and staff. The University of British Columbia requires academics to register individually (see here and here). Toronto Metropolitan University, by contrast, has committed to a central reporting tool.

PROC Testimony

Commissioner Anton Boegman testified before the Standing Committee on Procedure and House Affairs on October 6 to provide an update on the registry's implementation. Throughout the meeting, he emphasized that his Office's priority is educating the public about the registry. He identified lack of public awareness as the main reason for the low number of registrations to date.

He said the office will be able to provide more clarity on next steps as well as offer suggestions for possible improvements to the act after he has a better sense of the type of influence activities in Canada and a bigger volume of registrants to evaluate.

In response to questions about the registry's potential, he stressed that its goal is to increase transparency and deter covert foreign influence, not to act as a foreign agent list or to discourage legitimate activities. While insignificant activities may be captured by the registry, he said it was important that they are registered in order to detect more significant (and potentially problematic) activities.

In addition to supporting individuals with registering, the Commissioner is preparing to move to the next phase on compliance and enforcement activities, following the October 3rd deadline.

CUAME and Canada-China Focus Webinar

On October 14th, 2026, CUAME partnered with Canada-China Focus, University of Victoria, to host a webinar, joined by guests Deidre Pollard Bussey, deputy commissioner of the Office of the Foreign Influence Commissioner of Canada, and Tamir Israel of the Canadian Civil Liberties Association. The webinar was moderated by Senator Yuen Pau Woo, chair of CUAME. A recording of the webinar as well as the Powerpoint Presentations of the two panelists are available at here. The discussion following the presentations, including questions from the audience, have raised a number of questions.



Commissioner Anton Boegman testifying at PROC, sourced from ParlVU

In the hypothetical case of a Canadian academic who writes an op-ed advocating certain policies for the Canadian government following a lecture in Shanghai at a state university, would this academic be required to register? The Deputy Commissioner responded that the op-ed as such would not warrant registration since information and cultural exchanges fall out of scope for registration.

However, if the academic had "an arrangement" with the foreign state university, that person would be subject to registration. The Deputy Commissioner said that a contract or funding agreement that included public communications on policy issues would constitute "an arrangement" but that even in the absence of such a formal agreement, the academic could be deemed to be informally "in association with" the

foreign principal and therefore subject to registration.

The same applies to a journalist who writes an article seeking to influence a Canadian political or governmental process. While it is clear that this journalist would have to register if he was on "contract" to the foreign principal, it may be the case that he also has to register even in the absence of a contract, because he is deemed to be "in association with" the foreign principal.

The Deputy Commissioner also stated that a foreign principle must be linked to a government, or a government controlled entity. This excludes privately owned foreign companies, such as social media platforms, oil and gas companies, environmental NGOs, and pharmaceutical companies, as well as private individuals such as tycoons, celebrities, and media influencers. She acknowledged that such entities may be as influential as foreign governments, and the consequences of their influence as great or greater than what governments may attempt, but stressed that the act is being implemented exactly as it is written, and that non-state foreign principals are excluded in the law.

When asked about how informal arrangements could be identified, the Deputy Commissioner said that the office can conduct investigations and will draw on tips from informants and possible leads from law enforcement and other government departments. She did not elaborate on the process for determining if the relationship between a Canadian and a foreign principal constituted "an arrangement" in the absence of a formal agreement. She also did not describe how the OFIC will identify potential targets for investigation into non-compliance, for example if this would be done on a sectoral or country basis.

The Deputy Commissioner clarified that international bodies such as the UN, OECD, and APEC "can potentially be seen" as foreign entities, though did not confirm. Addressing an earlier concern Mr. Israel raised about activists (e.g. human rights defenders) and whistleblowers being publicly exposed, the Deputy Commissioner responded that personal safety concerns can be discussed with the office. She gave no firm answer on how the process may work and whether it would cover all types of human rights defenders or only certain cases of such.



Deputy Commissioner Deidre Pollard Bussey , Snipping from CUAME and Canada-China Focus Webinar, availble for viewing on the FITR Monitor Webpage



Summary

The FITR has only been live for three months and remains at an early stage of implementation. Many questions remain about the registration criteria and there is widespread confusion about the requirement to register. This likely explains the very low number of registrants to date. Through the FITR monitor, CUAME will continue to track the OFIC's bulletins, new listings, and other information relevant to the implementation of the Registry. Stay tuned for our next quarterly bulletin. If you have any questions or would like to discuss your concerns about FITR, please contact us at fitrmonitor@cuame.ca

All formal inquiries about registration obligations should be sent directly to the OFIC at info@influencecanada.gc.ca.