



Registration Requirements related to the Academic Sector

Commissioner's opinion

Academic research, applied research, and international collaboration does not, in and of itself, require registration under the *Foreign Influence Transparency and Accountability Act* (FITAA).

Registration is required where an individual or organization undertakes influence activities pursuant to an arrangement with a foreign principal and those activities are in relation to a Canadian political or governmental process.

A foreign university, college, polytechnic, institute, funding body, or other academic organization is not a foreign principal merely because it receives foreign government funding.

Academic research, teaching, scholarly exchange, and the dissemination of knowledge will not generally be considered to be in relation to a Canadian political or governmental process solely because they concern matters of public policy or may be considered by policymakers.

Whether registration is required depends on the facts of each case. The individual or organization who has the arrangement is responsible for assessing any registration obligations and registering the arrangement.

The guidance and examples that follow illustrate how the Commissioner interprets and applies these principles in common academic sector contexts.

Identifying a Foreign Principal

The definition of a foreign principal is broad and is not limited to foreign governments. In the academic context, examples of foreign principals may include:

- a foreign government department or ministry;
- a foreign government research agency or funding body;
- a state-owned or state-controlled academic institution or research institute; or
- another organization that is controlled, in law or in fact, by a foreign state or foreign power.



Many foreign universities, colleges, polytechnics, institutes, and other organizations receive funding from foreign governments or other international sources.

An entity is a foreign principal if it is controlled, in law or in fact, by a foreign state or group of foreign states. An entity is also a foreign principal if it is substantially owned by a foreign state or group of foreign states. In the academic sector, this includes state-owned academic institutions.

Where it is unclear whether an entity is controlled, in law or in fact, by a foreign state or group of states, all relevant facts and circumstances should be considered including whether a foreign state can appoint leadership, direct strategic priorities, influence decision-making, control operations, or otherwise exercise authority over the entity. No single factor is determinative, and the significance of any particular consideration will depend on the specific circumstances.

The Office of the Foreign Influence Commissioner of Canada (OFICC or the Office) will verify all submitted registrations, including whether the organization listed as the foreign principal meets the criteria.

Identifying an Arrangement

In the academic sector, arrangements may arise in a variety of contexts, including memoranda of understanding, research collaborations, funding agreements, partnership agreements, pathways agreements, academic exchange programs, sponsorship arrangements, curriculum development, and other forms of cooperation.

Registration is only required where influence activities are undertaken pursuant to an arrangement with a foreign principal and in relation to a Canadian political or governmental process.

When assessing whether an arrangement exists, relevant considerations may include:

- the terms and conditions governing the relationship with the foreign principal;
- any expectations of the foreign principal regarding activities to be undertaken;
- whether the parties have agreed to work together toward a particular objective;
- the overall nature of the relationship between the parties.

The following activities do not, by themselves, satisfy the elements of an arrangement:

- receiving a grant, contribution, donation, or other funding agreement from a foreign principal;



- participating in research collaborations, including joint research, co-authorship, information-sharing, and consortium-based research;
- participating in applied research partnerships, including prototype development, product testing, technology transfer activities, contract research, and applied research and development collaborations;
- participating in joint funding arrangements, shared research infrastructure, academic exchange programs, or other forms of academic cooperation;
- complying with routine research funding requirements, including project milestones, reporting obligations, publication requirements, and dissemination requirements, where the researcher retains independence regarding the analysis, findings, conclusions, and content of communications arising from the research.

Influence Activities

Influence activities include:

- communicating with [public office holders](#);
- communicating, disseminating, or causing to be communicated or disseminated, information; and
- providing money, services, use of facilities, or things of value.

Researchers routinely communicate findings and expertise through a wide range of activities.

The following forms of scholarly communication are influence activities, **when undertaken pursuant to an arrangement**:

- publishing journal articles, books, reports, policy papers, and research briefs;
- presenting at conferences, workshops, seminars, and public events;
- delivering lectures, keynote addresses, and guest presentations;
- participating in media interviews, podcasts, webinars, and panel discussions;
- publishing content through websites, newsletters, blogs, social media platforms, and other digital channels;
- disseminating research findings to public office holders or the public;
- responding to a government consultation (e.g., regulatory consultation)
- contributing expertise to advisory bodies, expert panels, and other governmental processes
- submitting briefs, position papers, or recommendations to government bodies; or



- organizing events intended to inform public or governmental discussion on a policy, legislative, or regulatory issue.

Activities undertaken independently of an arrangement are not subject to registration merely because the individual or organization has another relationship with a foreign principal.

Academic events and use of facilities

Universities, colleges, institutes, polytechnics, collège d'enseignement général et professionnel (CEGEPs), and institutes regularly make classrooms, auditoriums, meeting spaces, and other facilities available to students, faculty members, community groups, and external organizations. They may also provide administrative, logistical, communications, or other support services associated with events and activities.

A university, faculty, department, college, polytechnic, CEGEP, or institute provides a service or the use of a facility is carrying out the influence activity when it organizes, coordinates, promotes, or otherwise assists in delivering an event or activity in relation to a Canadian political or governmental process as part of an arrangement with a foreign principal.

By contrast, an institution would not itself be carrying out the influence activity when it is not part of an arrangement and merely provides facilities or services through its ordinary booking, rental, or administrative processes to enable **others** to execute an influence activity.

In Relation to a Canadian Political or Governmental Process

Political and governmental processes encompass legislative, executive, and electoral processes at all levels of government in Canada.

An activity will generally be considered to be in relation to a Canadian political or governmental process where it **seeks to affect, shape, or influence decisions, actions, opinions, or conduct** in connection with a specific legislative proposal, policy or program, regulatory process, government decision, election, referendum, or other political or governmental process identified in the Act.



The influence activity alone does not establish this connection. In assessing whether an activity is in relation to a Canadian political or governmental process, relevant considerations may include:

- the content of the activity;
- its purpose and intended audience;
- how the information is communicated or presented; and
- the setting in which the activity occurs.

Academic activities are not generally considered to be in relation to a Canadian political or governmental process merely because they contribute to public knowledge, academic debate, or discussions of public policy.

The administration of, or application for a Canadian government program, does not, by itself, constitute an activity in relation to a Canadian political or governmental process. Activities such as routine communications with Canadian officials regarding the administration, implementation, reporting, or delivery of such programs will not generally be considered activities in relation to a Canadian political or governmental process.

However, an activity may be in relation to a Canadian political or governmental process where, pursuant to an arrangement with a foreign principal, the activity seeks to affect, shape, or influence decisions, actions, opinions, or conduct of government. This includes research findings, expertise, or other information which are communicated or disseminated in connection with a specific political or governmental process in Canada.

There is currently no obligation to register influence activities directed at Indigenous public office holders or Indigenous political or governmental processes, as paragraphs (c) and (d) of the definition of "public office holder" in section 2 and paragraph 4(c) of the Act are not yet in force.

Who needs to register

The individual or organization who has an [arrangement](#) with a foreign principal will need to register. Where an institution has an arrangement with a foreign principal, the arrangement is registered by an individual authorized to act on the institution's behalf.

A faculty, department, research centre, or other affiliated entities that have an arrangement may register the arrangement when it is acting on its own behalf. Whether the affiliated



entity is acting on its own or on behalf of the broader institution will depend on the parent institution's governance framework and the relevant facts of the situation.

For example, an affiliated entity that is the party to the arrangement should use its own organization identification number in the registration submission. If it does not have its own organization identification number, it should use the parent institution's organization identification number.

If an individual who is affiliated with an institution (e.g., professor, researcher, student) is acting independently and has their own arrangement with a foreign principal, that individual will register their arrangement.

FITAA does not prescribe how academic institutions or other entities manage internal compliance, oversight, or decision-making processes related to registration obligations. Institutions should establish their own policies, procedures, and governance mechanisms to identify arrangements that could engage FITAA requirements and to determine how they will manage registration responsibilities within their organization.

Common Academic Sector Scenarios

The following examples illustrate how the principles discussed in this advisory opinion may apply in common academic sector contexts.

Research and Academic Collaborations

Foreign-funded research publication

Example 1(a): Registration not required

A Canadian researcher receives funding from a foreign principal to conduct a research project. The funding agreement requires financial reporting and acknowledgement of the funding source and preserves the researcher's independence regarding the content, findings, conclusions, and dissemination of the research. The researcher remains free to determine whether, when, and how research findings are published or communicated. The researcher publishes the results in academic journals and presents them at scholarly conferences. The research is not framed to influence a specific Canadian political or governmental process.

Registration would not be required. Although the researcher may be acting in association with a foreign principal given the funding relationship, the communications and dissemination



activities are not undertaken pursuant to the arrangement nor are they in relation to a Canadian political or governmental process. Therefore, not all elements of the Act have been satisfied.

Example 1(b): Registration required

A Canadian researcher receives funding from a foreign principal to conduct a research project. The funding agreement requires the researcher to publicly disseminate findings that support the foreign principal's interests in relation to a proposed Canadian law, policy, regulatory proposal, or government decision. The researcher publishes reports, participates in media interviews, and meets with federal officials to promote those findings.

Registration would be required. The researcher is undertaking influence activities pursuant to an arrangement with a foreign principal, and those activities are being carried out in relation to a Canadian political or governmental process. All elements of the act have been satisfied.

International research partnership

Example 2(a): Registration not required

A Canadian researcher participates in a multi-country research consortium that includes a foreign government research agency. Consortium members jointly publish research findings addressing climate adaptation and public health issues. The publication contains observations that may be relevant to Canadian policymakers but does not seek to influence a specific Canadian legislative, regulatory, policy, or governmental process.

Registration would not be required. Participation in collaborative research and publication activities does not, by itself, create a registration obligation. Although the publication may address issues of public policy importance, it is not being disseminated pursuant to an arrangement requiring influence activities in relation to a Canadian political or governmental process.

Example 2(b): Registration required

A Canadian college enters into a research agreement with a foreign state-owned polytechnic to develop a new technology for use in Canada. As part of the agreement, the college is required to communicate with federal officials and disseminate information supporting amendments to a Canadian regulatory framework governing the technology's deployment.



Registration would be required. The college is undertaking influence activities pursuant to an arrangement with a foreign principal and those activities are being carried out in relation to a Canadian governmental process. All elements of the Act have been satisfied.

International education partnership

Example 3(a): Registration not required

A Canadian college participates in a federally funded international capacity-building project with a foreign ministry of education. College staff communicate with Canadian officials regarding funding, reporting, implementation, and project administration.

Registration would not be required. Participation in and administration of the project, including routine communications required for program delivery, do not by themselves constitute activities in relation to a Canadian political or governmental process.

Example 3(b): Registration required

A Canadian college participates in an international education partnership with a foreign ministry of education. Pursuant to the arrangement, the college is asked to communicate with Canadian officials to advocate for changes to study permit eligibility criteria affecting students from that country.

Registration would be required. The college is undertaking influence activities pursuant to an arrangement with a foreign principal in relation to a Canadian governmental process.

Participation in Governmental Processes

Providing expert advice

Example 4(a): Registration not required

A professor has an arrangement with a foreign principal related to a research project. The professor is subsequently invited by a provincial ministry to serve on an expert advisory panel examining a public policy issue related to that research. In participating on the panel, the professor provides independent technical advice, answers questions about the relevant research, and does not advocate for any particular policy outcome.

Registration would not be required. Although the professor has an arrangement with a foreign principal and draws on knowledge developed through the research project, the professor's participation on the advisory panel is limited to providing neutral expert advice



in their independent academic capacity. The professor is not seeking to influence, shape, or alter a Canadian political or governmental process. Accordingly, the activities would not be considered influence activities in relation to a Canadian political or governmental process and therefore not all elements of the Act have been satisfied.

Example 4(b): Registration required

A researcher has an ongoing research collaboration with a foreign principal. Pursuant to the arrangement, the foreign principal requests that the researcher participate in a Canadian government consultation and submit recommendations supporting the foreign principal's interests regarding a proposed policy initiative.

Commissioner's opinion: Registration would be required. The submission constitutes an influence activity undertaken pursuant to an arrangement with a foreign principal in relation to a Canadian political or governmental process.

Immigration and visa administration

Example 5(a): Registration not required

A Canadian institution communicates with Immigration, Refugees and Citizenship Canada regarding the processing of individual study permit applications, administrative errors, or implementation issues affecting students participating in an international academic partnership.

Registration would not be required. Routine administrative communications regarding individual cases or program administration do not, by themselves, constitute influence activities in relation to a Canadian political or governmental process.

Example 5(b): Registration required

A Canadian institution has an arrangement with a foreign principal relating to an international education partnership. Pursuant to the arrangement, the institution communicates with Canadian officials seeking changes to study permit processing rules and eligibility requirements affecting students from the foreign principal's jurisdiction.

Registration would be required. The institution is communicating with public office holders pursuant to an arrangement with a foreign principal in relation to a Canadian governmental process.



Academic Events and Conferences

Example 6(a): Registration not required

A Canadian academic institution hosts an international academic conference that includes speakers from foreign universities, foreign government research agencies, and Canadian institutions. Some presentations discuss issues that may be relevant to Canadian public policy. The university organizes the conference as part of its ordinary academic activities and not pursuant to an arrangement with a foreign principal regarding a Canadian political or governmental process.

Registration would not be required. Although foreign principals may participate in the event, the university is not providing services or facilities pursuant to an arrangement connected to a Canadian political or governmental process. The event is being conducted for academic purposes rather than to influence a Canadian political or governmental process.

Example 6(b): Registration required

A Canadian university faculty enters into an arrangement with a foreign principal to organize and promote a public event on campus concerning proposed changes to a Canadian policy. The purpose of the event is to provide the foreign principal with a platform to present and promote its views on the Canadian policy. The faculty provides facilities, coordinates speakers and invitations, promotes the event, and provides administrative support.

Registration would be required. The faculty is providing services and the use of facilities pursuant to an arrangement with a foreign principal in relation to a Canadian political or governmental process. All elements of the Act have been satisfied.

Example 7(a): Registration not required

A researcher presents findings at an academic conference attended by federal, provincial, and municipal public office holders. The presentation is delivered in the ordinary course of the conference and is not undertaken pursuant to an arrangement requiring the researcher to communicate with public office holders or influence a Canadian political or governmental process.

Registration would not be required. There is no arrangement with a foreign principal, and the presence of public office holders in the audience does not transform an academic presentation into a registerable influence activity.



Example 7(b): Registration required

A researcher delivers a presentation pursuant to an arrangement with a foreign principal. The presentation is specifically organized to influence federal and provincial public office holders regarding proposed changes to a Canadian policy. Invitations are targeted to decision-makers and the researcher is expected under the arrangement to advocate for particular policy outcomes.

Registration would be required. The communication is undertaken pursuant to an arrangement with a foreign principal and is intended to influence a Canadian political or governmental process.

Conclusion

FITAA is a transparency regime. It is not intended to restrict international collaboration, academic freedom, or the communication of research findings.

When assessing a potential obligation, researchers and institutions should consider whether an arrangement exists, which will depend on the facts of each case. This analysis can be aided by the factors set out above.

This advisory opinion is issued by the Commissioner under the authority of subsection 13(1) of the *Foreign Influence Transparency and Accountability Act* (FITAA or the Act). Its purpose is to state the Commissioner's official view on the application of the Act to the academic sector.

This advisory opinion is not binding and is not a substitute for the law. It is intended as a guide for compliance with FITAA but should be read in light of FITAA, the *Foreign Influence Transparency and Accountability Regulations*, court decisions, and decisions of the Commissioner. If there is a discrepancy between the advisory opinion and FITAA or the Regulations, FITAA and the Regulations take precedence.

[Interpretation bulletins](#) have been issued by the Commissioner that address general concepts within the Act. This opinion helps ground those interpretations to the reality of the academic sector and should be read in conjunction with the interpretation bulletins.

Advisory opinions may evolve and be further refined over time.

For additional information, consult the [Interpretation Bulletins](#), [Registration Assessment Quiz](#), and other guidance materials available on the Office's [website](#).