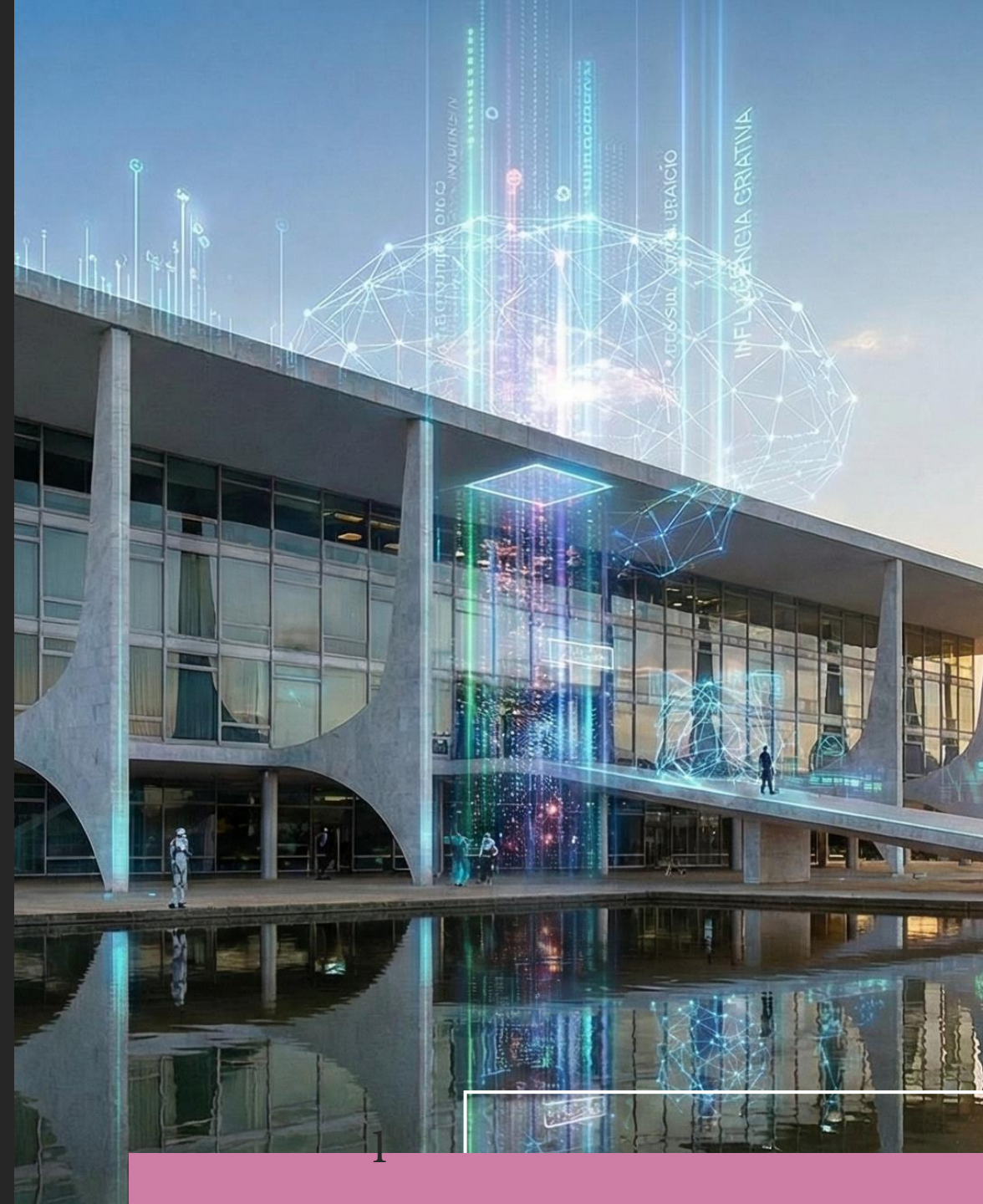


REGLAB RADAR

From the Feed to the Planalto

The Federal Executive and Digital Influencers



About Reglab

We are a **private research center specializing in the media and technology sector**, supporting companies, associations, and policymakers in making strategic decisions based on data and evidence.

Find out more at www.reglab.com.br

About Radar Series

The Radar Series by Reglab presents **visual reports that blend qualitative and quantitative data**, offering a contextualized view of specific phenomena.

Radar aims to synthesize complex information into an accessible format, aiding the understanding of emerging trends and agendas through visual and graphic design resources.



engage.hub
Intelligence Center on Influence & Society



Engage.hub is **Reglab's applied research center** that investigates the social, economic, and regulatory impacts of **influencer marketing and digital creation**. Our goal is to improve the market and public policies through more **data and evidence**.



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From the Feed to the Planalto: The Federal Executive and Digital Influencers

influencers are a government strategy, but not yet a state policy.

- **The Executive Branch primarily uses influencers as a public communication tool.** Nearly 50% of the analyzed initiatives leverage creators to amplify health, human rights, and tourism campaigns — yet they lack professional recognition or sector-specific policies.
- **The Ministry of Health and the Ministry of Justice and Public Security lead influencer use in strategic actions.** Under the Lula administration, this trend intensified: the total number of initiatives doubled compared to the previous government, with significant growth in health campaigns, human rights, and emergency actions spread across different agencies.
- **Brazil still lacks a public policy for digital influencers.** While their instrumental use has grown, digital creators still lack a specific CNAE code, dedicated cultural policy, digital entrepreneurship initiatives, or labor protection guidelines — failing to recognize these professionals as part of the creative economy, informational infrastructure, or contemporary digital labor.

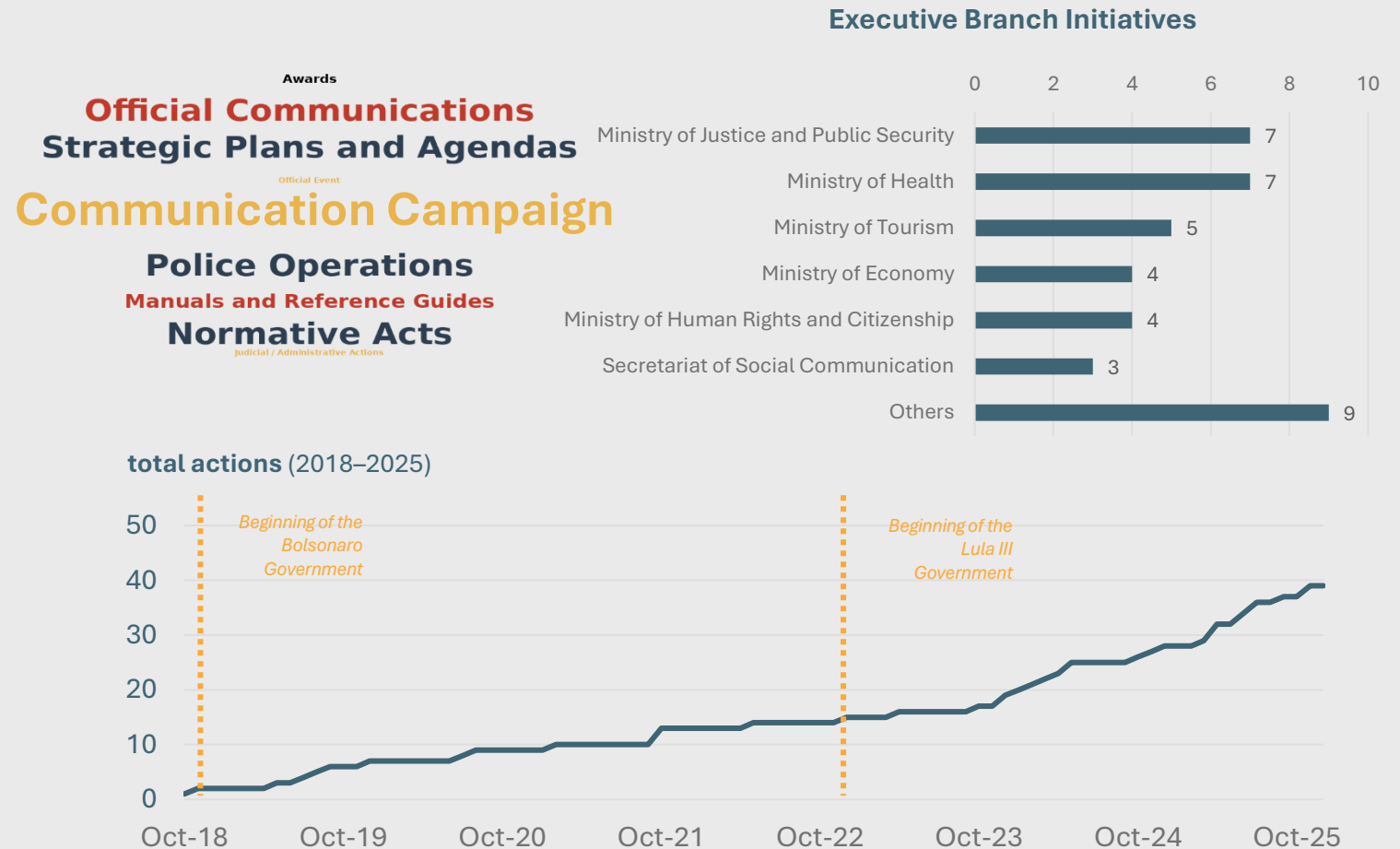


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Brazil is the country with the most digital influencers in the world. There are 3.8 million content creators — nearly 16% of all influencers on the planet. To grasp the scale of this phenomenon: **there are more professional influencers in Brazil than doctors, lawyers, or engineers** with active professional registration. This is not merely a curious fact — it is **a portrait of a profound societal transformation.**

This study is part of a **new Reglab series produced by the Engage.hub research unit**, dedicated to understanding how the Brazilian state responds to the growth of the influencer economy and the strategic role that digital creators have come to play in public, political, and cultural mediation.

In October 2025, our first report, “[From the Feed to the Plenary](#)”, **mapped the activities of the National Congress**, examining bills and competing narratives shaping regulation over creators, revealing a reactive legislature marked by a predominantly negative and moralizing view of digital influence.

In this new phase, **we move into distinct territory: the Federal Executive Branch.** Unlike the legislature, the Executive produces direct actions — programs, campaigns, and implementation mechanisms that affect the lives of influencers and the broader dynamics of public communication.

Investigating the Executive is crucial because it is through this branch that public policies become concrete.

In doing so, we offer a complementary perspective — enabling understanding not only of what the state says, but above all what the state does in the face of digital influence. This is a relevant contribution for companies, policymakers, and researchers interested in more coherent, evidence-based regulation that is sensitive to the complexity of this ecosystem.

who are digital influencers?

But who exactly are Brazilian digital influencers?

Contrary to the popular image of people in their 20s, most are in their 30s. Cisgender women dominate the sector, and ethnic diversity also appears in the numbers. In terms of engagement, nano-influencers (1K–10K followers) achieve more than double the engagement rate of large profiles, and Brazil has the world's highest rate of purchases driven by influencer recommendations.

It is a market worth **R\$ 20 billion**, which grew by approximately **43%** in the last year

36%

between 30–39 years old, and 21% between 16–24

74.7%

are cisgender women *

49%

are white, 31% mixed-race, and 16% Black

3.2%

nano-influencer engagement rate

73%

make purchases based on influencer recommendations

the research universe

For this study, we used publications from the **Official Federal Gazette** and the **Gov.br Portal** starting from **January 1, 2018 through November 15, 2025**, including not only official acts and communications, but also news items covering actions by the Federal Direct Administration on the subject. This is a non-exhaustive analysis, but with a *corpus* robust enough for the assessment proposed in this study.

Awards

Official Communications
Strategic Plans and Agendas

Official Event

Communication Campaign

Police Operations

Manuals and Reference Guides

Normative Acts

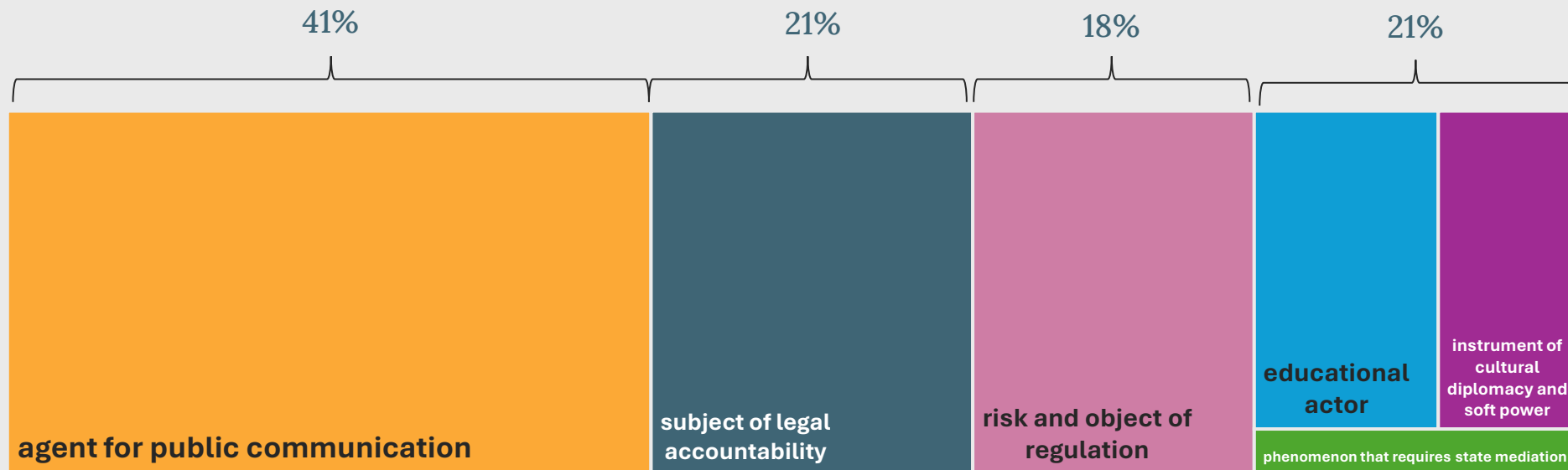
Judicial / Administrative Actions

* Data prior to 2018 from the Official Gazette is not available in the same format, which led to inconsistencies when comparing findings with the “From the Feed to the Plenary” study (2015–2025). However, mentions from that period were minimal and do not affect the conclusions of this research.

Digital creators are integrated as communication tools, but also emerge as sources of risk

The federal government has repeatedly incorporated digital influencers into its public communication strategies, using them as intermediaries to reach different audiences. They are also included in future strategic plans and are targets of police operations and *enforcement*.

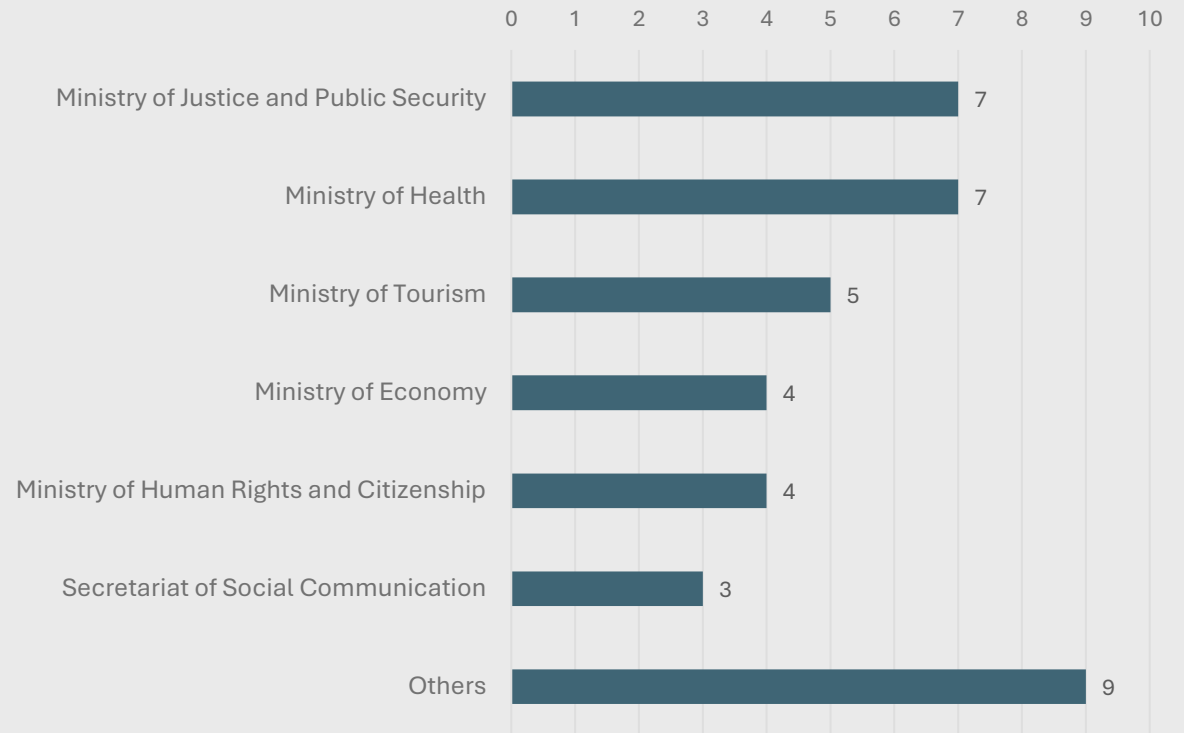
The Planalto sees influencers as...



Executive actions focus on health and security, highlighting both utility and risk

The Ministry of Health primarily uses influencers for public communication campaigns, while the Ministry of Justice and Public Security conducts risk awareness actions, surveillance, and enforcement. Tourism, Economy, and Human Rights follow, showing that content creators are also incorporated into economic, cultural, and inclusion agendas. SECOM, in turn, consolidates guidelines for institutional use.

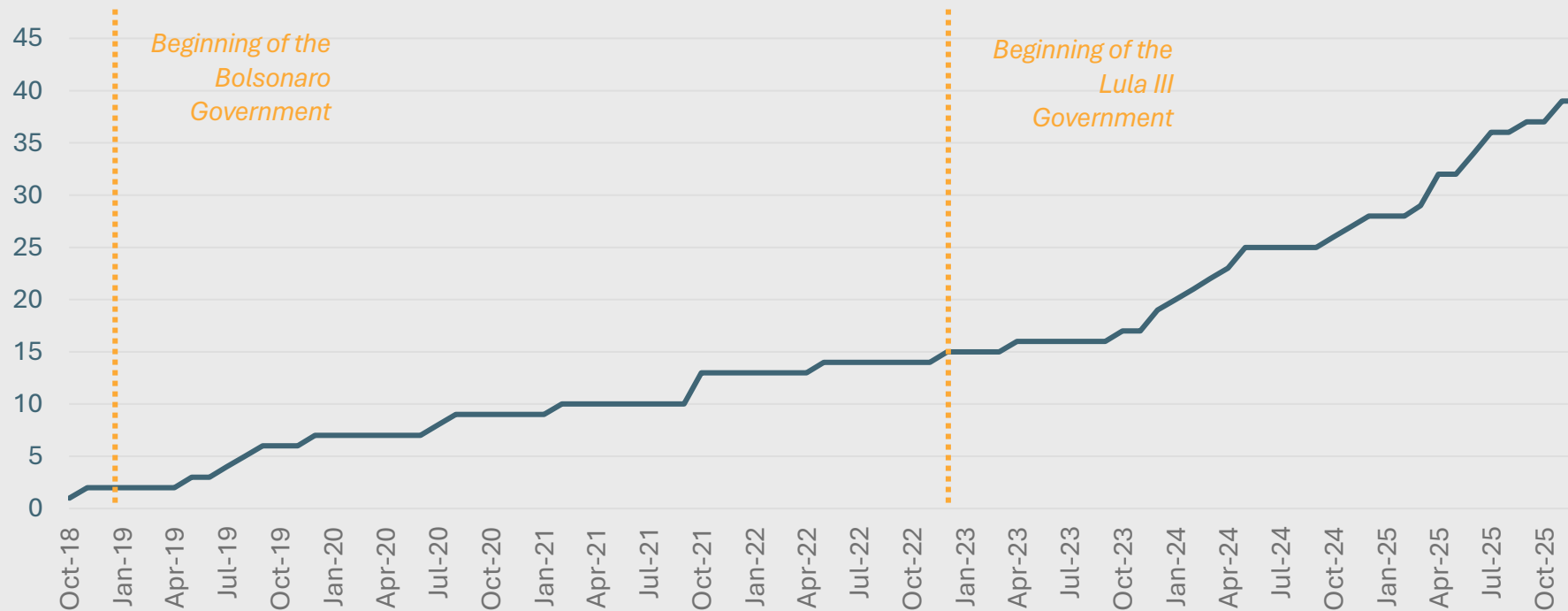
Executive Branch Initiatives



There was a rapid expansion of actions involving digital influencers from 2023 onward

Through 2022, the federal government's engagement with digital creators was concentrated in just 8 agencies, with more than half of all actions carried out by the Ministries of Health and Tourism. From 2023 onward, a significant shift is observed: actions not only increase but begin to involve 14 different agencies, reflecting greater institutional spread and cross-cutting use

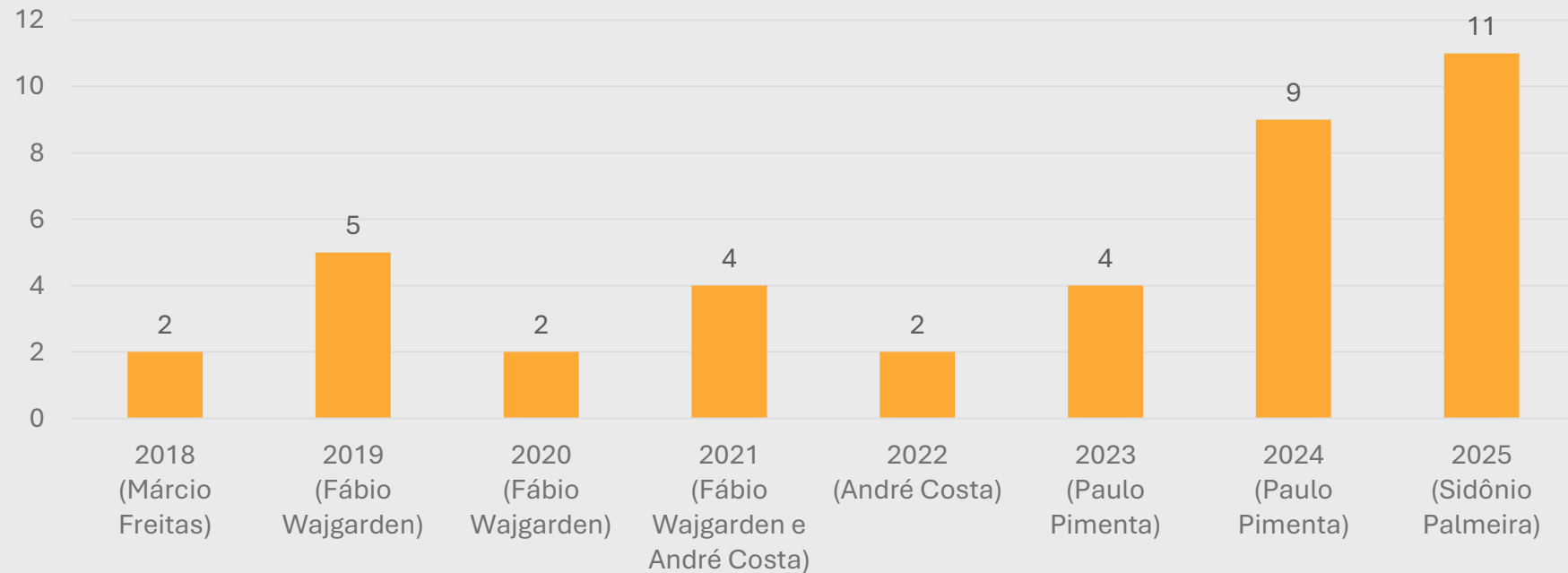
total actions (2018–2025)



The importance of digital creators in government strategy grew from 2024 onward

Through 2023, actions involving influencers were isolated and scattered, without evidence of a coordinated institutional strategy. From 2024 onward, particularly following the reorganization of the Government Communications Secretariat, a qualitative shift is observed: the use of digital creators becomes more structured, intentional, and transversally embedded in federal public policies.

Initiatives per year



The Ministry of Health uses influencers for national campaigns and adopts a digital logic in its public communication

The Ministry of Health's approach, with actions dating back to 2018, reveals a pattern of maturity in integrating influencers as amplifiers of national campaigns on topics such as dengue, breastfeeding, organ donation and HIV. The case of Zé Gotinha as a “digital influencer” demonstrates the institutional adoption of the creators logic, incorporating formats, tones, and strategies typical of social media to expand reach and message retention, consolidating a model in which influence is seen as a tool for shaping behavior and disseminating public policies more effectively.

Ministério da Saúde lança perfis do Zé Gotinha no Instagram, Threads e Tik Tok

Redes sociais do maior símbolo da imunização do Brasil entraram no ar nesta terça-feira (8) com a missão de reforçar mensagem sobre a importância da vacinação



Em mobilização contra a dengue, Ministério da Saúde conta com o apoio de artistas e influencers

Ação '10 minutos contra a dengue' incentiva atitudes simples de prevenção e eliminação dos criadouros do mosquito com vídeos gravados por famosos

* The images show media reports on the Ministry of Health's use of influencers in public health campaigns.

Influencers enter the Ministry of Justice's radar for security and consumer protection

The Ministry of Justice and Public Security's actions are predominantly concentrated from 2023 onward, framing influencers as actors subject to legal accountability and regulatory oversight. Police operations have been announced with a focus on influencers' roles, while SENACON publishes technical notes and alerts reinforcing transparency obligations and shared responsibility in digital advertising. Additionally, campaigns such as “Don't Wait 24 Hours” show that the agency also uses communication to guide consumers.

CONSUMIDOR

Nota técnica sobre bets orienta atuação do Sistema Nacional de Defesa do Consumidor

Documento da Senacon e do Procon-RJ fortalece ações de proteção dos direitos dos cidadãos no mercado de apostas

SEGURANÇA VIÁRIA

Influenciadores têm redes sociais bloqueadas e veículos apreendidos após manobras perigosas na BR-101

Abordagem da PRF no Paraná culminou com a apreensão de dois veículos de luxo pela Polícia Civil de Santa Catarina

With the growth of influencer marketing, more and more companies and brands have turned to digital influencers to promote their products and services. However, whenever any commercial relationship is involved — whether through direct payment, product gifting, bonuses, or other forms of benefit — the content must be labeled as advertising. This applies to posts, videos, reels, stories, live streams, or any other format

Official SENACON Communication, June 17, 2025

* The images show news coverage and official communications from the Ministry of Justice addressing digital influencers in relation to consumer protection, advertising transparency, and public safety



The importance of influencers in tourism peaked in 2019–2020 and now combines communication with international soft power

The Ministry of Tourism's actions show that influencer use was most intense and structured between 2019 and 2020, when EMBRATUR budget resolutions explicitly mentioned creators as part of the country's promotional strategy — documents that were later revoked or discontinued. At the same time, initiatives such as the International Tourism Acceleration Program reinforce that influencers can not only serve as campaign vehicles but also as instruments of *soft power*, capable of projecting the country abroad and supporting economic agendas.

Viajantes do Brasil: conheça a influencer que fez do turismo seu modo de ganhar a vida
 A cada parada, Cris busca proporcionar aos seus seguidores experiências autênticas, combinando contato com a natureza e conexão com as comunidades locais. Venha com a gente e descubra mais sobre os atrativos do país na nova série do MTur

Parceria com YouTube busca aproximação com criadores de conteúdo para impulsionar turismo internacional
 Acordo foca no conceito de "turismo de tela" e prevê edital para YouTubers. Dados apontam que 95% dos principais canais de viagem são de criadores independentes

Tourism today is a social and digital experience. Travelers are influenced by what they watched and by what people share on YouTube, as well as in series and video games

Marcelo Freixo, President of Embratur, November 13, 2025



* The images show news coverage and promotional initiatives from Brazil's Ministry of Tourism using digital influencers to promote the country as an international travel destination.

The Finance Ministry's approach combines financial education, enforcement, and growing regulatory impact on influencers

At the Ministry of Finance, influencers appear both as partners in financial education initiatives — such as the Olympiad run by the National Treasury — and as targets of Federal Revenue Service operations. While not the direct focus of this study, it is worth noting the role of the CVM (Securities and Exchange Commission), an agency linked to the Ministry, which has produced to date the only Regulatory Impact Assessment from the Federal Executive Branch dedicated to influencers, specifically to *finfluencers*.



The partnerships aim to build a support network to promote the initiative and engage school communities, including principals, teachers, and students. Influencers will also be able to associate their personal brands with a cause of significant social impact, gaining positive image and exposure.

Rogério Ceron, Secretary of the National Treasury, July 4, 2025

CVM propõe consulta sobre repercussões da atuação dos influenciadores digitais no Mercado de Capitais

Consulta tem caráter conceitual e sugestões e comentários podem ser enviados até 1/3/2024

Tesouro Nacional convida influenciadores para ampliar alcance da Olimpíada de Educação Financeira

Parceria com a B3 busca nomes estratégicos nas redes sociais para engajar escolas e comunidades na Olitef 2025

* The images show media reports and official initiatives involving influencers in financial education and financial market regulation

Human Rights Ministry uses influencers to expand protection, inclusion, and build networks of social communicators

The Ministry of Human Rights and Citizenship demonstrates consistent use of influencers as mobilization agents in sensitive agendas, including child protection, combating violence, institutional celebrations, and inclusion campaigns. Beyond public communication materials, the Ministry created a specific form for communicators and creators, formalizing a network of partners capable of disseminating content aligned with human rights agendas.



Estou Aqui: Ministério dos Direitos Humanos anuncia campanha contra o capacitismo

Série de ações com influenciadores digitais pretende combater o preconceito e será lançada a partir do Dia Internacional das Pessoas com Deficiência, nesta terça (3)

Direitos Humanos vai reunir em Brasília influenciadores e especialistas em seminário sobre educação e cidadania digital

Inscrições gratuitas podem ser feitas pela plataforma Sympla; atividade acontece a partir da próxima segunda (12), é aberta à imprensa e terá a presença do ministro Silvío Almeida em bate-papo com o público

* The images show Brazilian news coverage of the Ministry's "Estou Aqui" anti-ableism campaign and a digital citizenship seminar in Brasília, both featuring influencers as key participants.

SECOM consolidates its own agendas and expands the use of influencers in national campaigns

The Government Communications Secretariat plays a central role in the government's digital strategy, guiding the actions of all ministries. Over the past year, a significant increase in influencer presence in paid media campaigns coordinated by SECOM has been observed, reflecting the growing institutionalization of *creators* use in government communication. Among its own initiatives, it is worth highlighting the Brazilian Media Literacy Strategy and the Guide on children, adolescents, and screens, which set guidelines for the responsible use of digital influence.

Media literacy ambassadors: coordination and collaboration with digital influencers for the production and implementation of social media campaigns, in a project that will involve the appointment of “media literacy ambassadors,” as well as engagement with social movements and children and adolescents who can act as ambassadors in their schools and communities.

Brazilian Media Literacy Strategy, October 2023



Recommendations for Digital Influencers:

- (...) Be transparent about advertising messages contained in their content or programs, using forms of commercial relationship identification that are not limited to written text.
- Discourage the work of children and adolescents in the digital environment, with awareness of its exceptional nature, as well as the legal requirements for child artistic activity in the country.
- Contribute to the dissemination of guidelines and best practices for the healthy use of electronic devices (...)

Children, Adolescents, and Screens, March 2024

* The images show Brazil's official guide on children, adolescents, and digital device use (March 2024).

The Ministry of Education uses influencers sporadically, but recognizes their emerging educational role.

The Ministry of Education's initiatives involving influencers are still sparse and poorly organized, indicating that creators are not, for now, considered a structural part of either educational policies or the Ministry's institutional communications. However, the recent decoration of some influencers with the “National Order of Educational Merit” suggests a gradual openness by the Ministry to validate and incorporate creators as relevant pedagogical agents.

What a joy to welcome @Debora Aladim and show her the behind-the-scenes of the Enem exam, which she has championed for so many years! Débora is one of our honorees with the National Order of Educational Merit. Congratulations!

Camilo Santana, Minister of Education, November 18, 2025

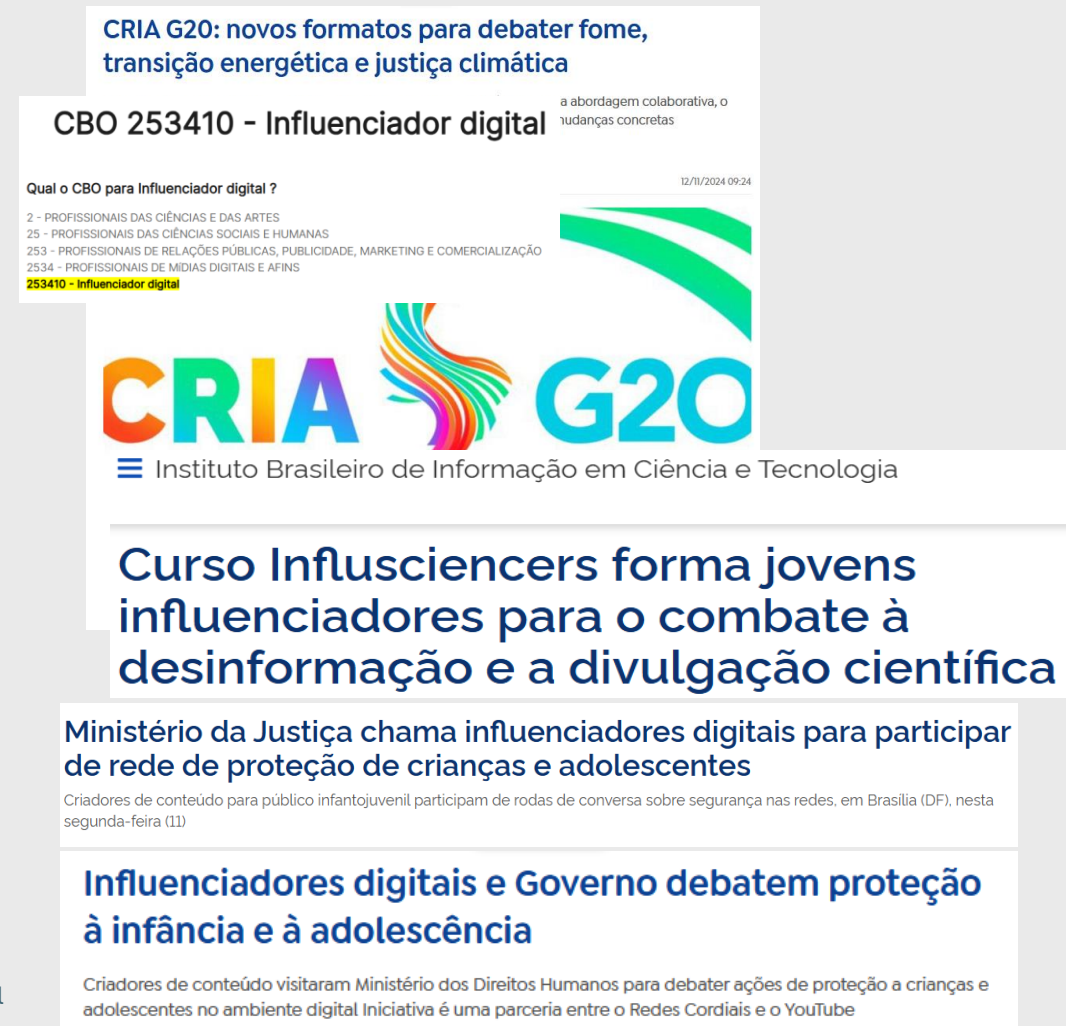


* The images show Influencer Débora Aladim receiving the National Order of Educational Merit from Brazil's Ministry of Education, November 2025.

Scattered actions reveal emerging fields, but also expose low engagement

The initiatives grouped under “others” show how different agencies treat influencers in an ad hoc manner for diverse purposes. The inclusion of digital influencers in the Brazilian Classification of Occupations (CBO) formalizes state recognition of the profession; AGU actions reveal legal responses, while events such as CRIA G20 and the Science Caravan mobilize creators in cultural, diplomatic, and scientific agendas. Notably, the limited involvement of the Ministry of Culture and the Ministry of Science and Technology suggests that these sectors may still present barriers to the symbolic recognition of digital creators in their spheres

* The images show Brazilian news coverage highlighting the formalization of digital influencers as a recognized profession and their engagement by federal ministries in public agendas such as G20, science communication, and child online safety.

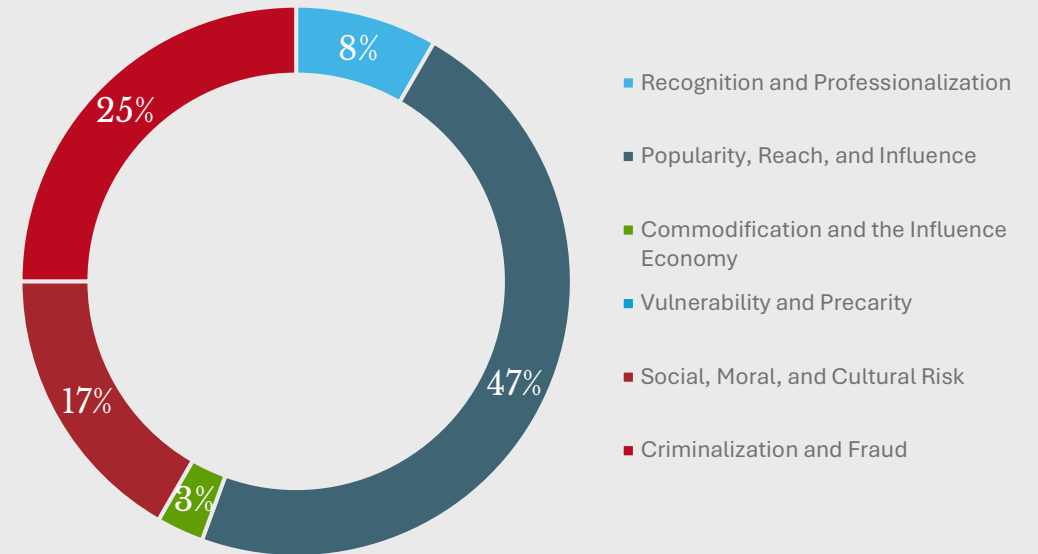


and what do these actions reveal about the Executive's discourse on influencers?

To answer this question, we used the same methodology and semantic categories for discourse analysis as in our study of the Legislature.

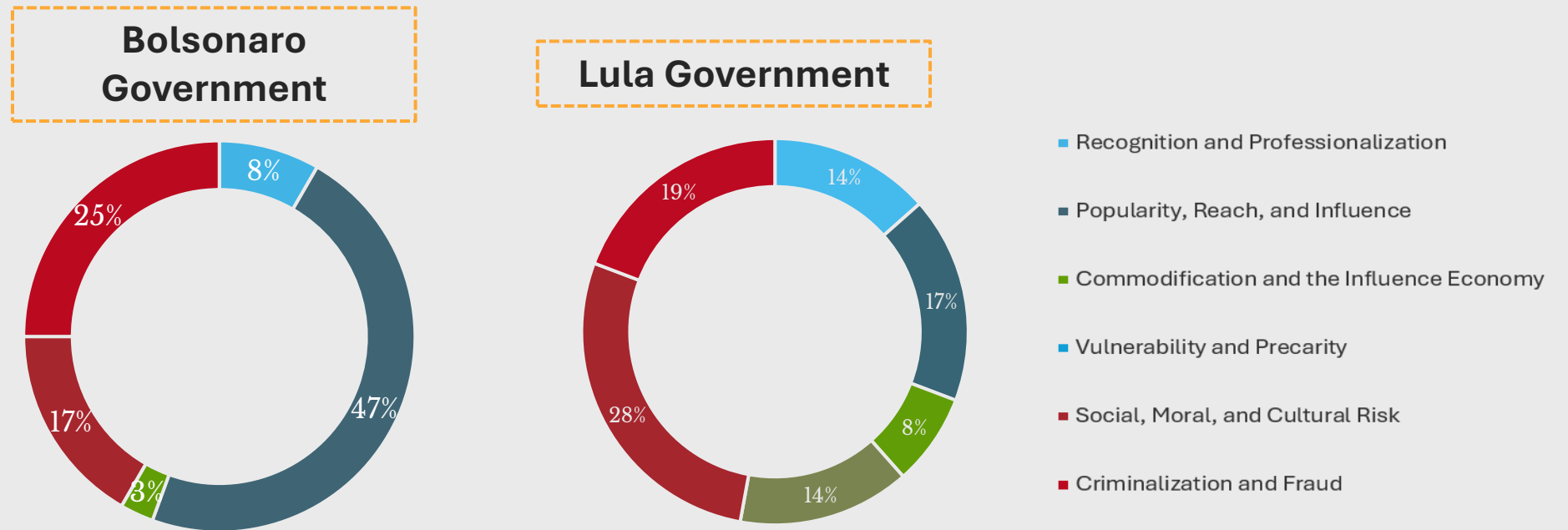
We found that, behind concrete actions, the Executive's discourse positions influencers as “popularity, reach, and influence,” an **instrumental use oriented toward campaigns, public communication, and mass engagement**. Also relevant is the framing of these professionals as potential vectors of harm, especially regarding children and consumption.

It is also striking that no action was identified within the “Vulnerability and Precariousness” field, which, together with the very low presence of the “Commodification and Influence Economy” dimension (1 entry), may indicate that **the federal government has not yet incorporated the socioeconomic dimension of the activity into its actions**.



there are discursive shifts between Bolsonaro and Lula, but causality cannot be established

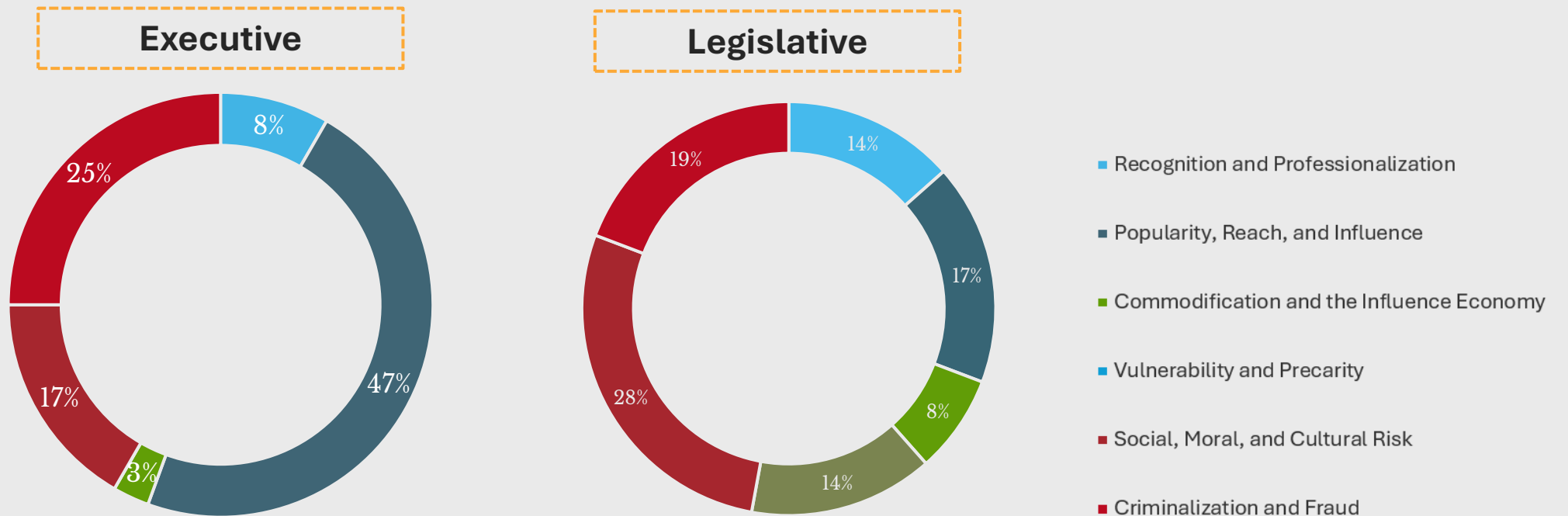
Under the Bolsonaro government, creators appeared **primarily as communication instruments**, while under the Lula government, the discourse shifts them to a more complex field, in which they are also **regulated agents and subjects of accountability**. This contrast suggests discursive shifts, but **cannot be interpreted exclusively as an effect of the change in administration**, as the Lula government shows twice as many occurrences as the Bolsonaro government, and digital influencers have had a greater social presence in recent years, especially in a post-pandemic context.



Methodological Note: The Temer Government was not included due to the small sample size for 2018 (2 entries).

Executive and Legislature converge in not valuing influencers as a profession or recognizing their social function

Comparing with the findings of the Feed to the Plenary study, we see that the Executive treats influencers primarily as **communication tools and public policy management instruments**, while the Legislature constructs them primarily as **moral problems and objects of criminalization**. Despite this difference — consistent with their constitutional roles — both branches share a gap: institutional recognition of influencers' professional activity remains marginal.



The Executive turns to creators when it needs to communicate, but rarely recognizes them as legal subjects or beneficiaries of public policies

The predominance of actions focused on public communication is natural and expected given the professional activity of digital creators, and **it is notable to see how the Executive has positively advanced in recognizing them as operational extensions of institutional campaigns and initiatives.**

But this presence should not be confused with a recognition of the professional activity, social function, or specific regulatory demands of these actors. Advertising use is, in most cases, functional and instrumental — and **does not necessarily point toward the consolidation of influencers as agents with rights, political voice, or structured participation in state decisions.**

The substantial absence of specific regulatory frameworks, governance mechanisms, dedicated indicators, inter-ministerial guidelines, or coordinated policies reinforces that Brazil still **lacks sufficient regulatory, supervisory, or institutional infrastructure** to deal with the phenomenon, including to protect influencers from abuses within the very market structures to which they are connected.

This section analyzes the research data through the lens of the authors of this study.

The state views influencers more through the lens of risk and accountability

A significant portion of the Executive's actions stems from discursive and content categories associated with risk and *enforcement*, in which influencers appear as agents potentially involved in illicit practices, irregular advertising, tax fraud, dangerous conduct, or risks to children and responsible consumption.

The absence of substantive initiatives in areas such as entrepreneurship, the creative economy, culture, labor policies, or formalization reveals that the Executive rarely constructs influencers as a legitimate part of the economy, or even as a potential solution.

This does not necessarily reflect a conscious or deliberate choice by public managers, **but may reflect the still incipient regulatory stage surrounding the influence economy**, a scenario that is not unique to Brazil — many countries are still building their institutional responses to the growth of the influencer economy.

Absences also speak volumes — and reveal strategic gaps

The cross-sectional analysis of the data shows that while agencies such as Health and Justice have consolidated influencer use, **dozens of ministries and core departments showed no structured action related to the topic during the analyzed period.** While not all areas of public administration have an immediate affinity with the sector, certain absences reveal strategic bottlenecks in recognizing digital influence as an economic and cultural driver.

The invisibility of the topic within the Ministry of Entrepreneurship, Small Business, and Microenterprise is particularly telling. **By not framing content creators through the lens of microentrepreneurship, the Executive delays fundamental agendas,** such as the necessary coordination with IBGE to define a National Classification of Economic Activities (CNAE) code specific to this category.

The absence of this formal recognition is not merely a bureaucratic matter: establishing a CNAE code is the indispensable first step for ensuring legal certainty in the tax sphere and, critically, for unlocking

This section analyzes the research data through the lens of the authors of this study.

the creation of fiscal incentive and development policies at the federal, state, and municipal levels.

Another significant gap is found in the Ministry of Communications: beyond expanding physical infrastructure, **the ministry could integrate influencers as strategic drivers in digital inclusion and literacy programs,** leveraging the reach of these actors to educate newly connected populations on safe and civic use of the internet.

Finally, **the Ministry of Culture's low profile stands out.** Although the creative economy sector is central to the ministry and a few actions were identified, the data indicates that public policies specifically designed to promote native digital audiovisual content from social media are still underdeveloped, revealing how digital influencers are not yet fully understood as integral to Brazil's cultural infrastructure.

“Positive” forms of recognition remain marginal and treated as exceptions

Thousands of influencers play a key role in promoting regional and traditional cultures. *Edu-influencers* support learning experiences, motivation, and student engagement. Niche creators have helped increase public trust in scientific information.

Even so, the survey shows that positive framings — such as *educational actor* and *instrument of soft power* — remain exceptions within the Executive. The absence of consistent policies in these areas reveals an institutional gap between **the real strength of the phenomenon** and **how the government incorporates it — revealing a missed opportunity.**

China, for example, has integrated fashion and lifestyle creators into its *soft power* agenda to reshape its global image and cultural influence, leveraging the viral dynamics of digital platforms. South Korea has transformed digital creators into components of its international policy, aligning influencers with cultural diplomacy, the entertainment industry, and internationalization strategies.

This section analyzes the research data through the lens of the authors of this study.

Caution and planning are essential — as is including digital creators as recipients of public policies

Despite their growing visibility and influence, it is necessary to recognize the limits of digital influence, avoiding exaggerated diagnoses or disproportionate expectations. The inherent heterogeneity of the sector — which ranges from highly professional creators to actors associated with disinformation — reinforces that this diversity demands caution, criteria, and governance. In this regard, it is also important to recognize how various Executive initiatives have pursued this progress prudently, expanding transparency, adopting criteria, and testing formats.

However, recognizing the structural limits of this sector does not mean accepting its precariousness as immutable, nor does it mean reducing the debate to risk assessments. On the contrary: precisely because the activities of influencers are volatile, heterogeneous, and marked by strong asymmetries, it becomes even more necessary for the state to move beyond the instrumental use of these agents and begin to include them as **explicit recipients of public policies.**

- / **What did we seek to answer with this study?** We investigated how the Executive Branch defines and operationalizes its governance over digital influencers, analyzing documents, campaigns, operations, and guidelines produced between 2018 and 2025.
- / **And what did we find?** The Brazilian Executive Branch mobilizes influencers primarily as functional instruments of public communication, while simultaneously framing them as potential vectors of risk and subjects of accountability. Positive recognition does appear, but remains isolated and poorly structured. And, across the board, there is a persistent absence of sector-specific public policies, indicating a state that is more reactive than strategic.
- / **And why does this matter?** The influence economy already permeates health, human rights, tourism, education, consumption, and culture, but the recognition of creators as rights-bearing subjects and economic agents has yet to keep pace with this expansion. By mapping discursive and institutional patterns, this study provides a foundation for discussing regulatory pathways capable of recognizing influencers as workers, cultural agents, and relevant actors in public policy.

Digital creators are not an exception or background noise: **they are part of the social and cultural infrastructure, and sound public policies begin when we recognize this.**

Based on the results and discussions of this study, along with its methodological limitations, we highlight the following directions for future research that could continue to advance this inquiry:

- / **Interviews with public managers.** Conducting semi-structured interviews with communication and planning teams from the ministries would allow for a deeper understanding of internal motivations, decision criteria, and institutional barriers not visible in official documents.
- / **Survey with influencers.** Applying a national survey with *creators* from different niches would help capture perceptions about public policies, levels of vulnerability, labor relations, and regulatory expectations, while also identifying regional barriers and Executive Branch actions at the state and municipal levels.
- / **International comparison.** Mapping policies from other countries (South Korea, China, United Kingdom, USA, Argentina) would help identify stages of maturity, governance models, and possible paths for Brazil.
- / **Sectoral Case Studies.** Developing in-depth investigations in areas such as health, education, tourism, and consumer protection would allow for observation of how influencer use varies by sector.
- / **Mapping budget flows for influencer campaigns.** Analyzing federal expenditures involving influencers would allow for an understanding of contracting patterns, sectoral distribution, and selection criteria, enabling an assessment of transparency, efficiency, and strategic coherence.
- / **Network analysis of state-influencer interactions.** This approach would allow visualization of how information, partnerships, and agendas circulate — offering a structural diagnosis of the instrumental use of influencer marketing in public communication.



● methodology annex

Methodology

general information

Reglab's research adheres to rigorous methodological standards to ensure objectivity and transparency. All data and findings are available for independent verification, reinforcing the credibility of our studies.

Data collection and analysis took place from November 7 to 23, 2025, with double validation to reduce bias and the use of software to organize the results.

1. **Data Collection**
2. **Data Analysis**
3. **Bias Reduction Procedures**
4. **Other Information**
5. **Ethical Guidelines**

Title

From the Feed to the Planalto: The Federal Executive and Digital Influencers

Research Question

How does the Executive Branch define and operationalize its governance over digital influence and content creators?

Methodology Summary

This study analyzes how the Federal Executive Branch approaches digital influencers in administrative acts, official campaigns, guidelines, and *enforcement*. The methodology is qualitative, deductive, and descriptive, grounded in documentary research from the Official Federal Gazette and the Gov.br. Content analysis applied descriptive coding based on pre-established categories; discourse analysis used semantic categories previously defined in an earlier study (*Feed ao Plenário*).

1. Data Collection

Data collection was conducted through **documentary research**, on the website of the **Official Federal Gazette** and **Gov.br Portal**. The collection covered all entries meeting the following conditions:

1. **Keywords:** (i) “digital influencer,” “digital influencers,” “digital creator,” “digital creators.”
2. **Responsible Agency:** Agencies of the Federal Executive Branch (direct public administration).
3. **Time Scope:** January 1, 2018 to November 15, 2025;
4. **Relevance Analysis:** *Does the document show the state acting on the subject (not merely describing it, as in a news item)?*
5. **Materiality Analysis:** *Does the document impose rules, allocate resources, create obligations, or generate rights that directly or indirectly affect digital influencers?*

Collection period

7 20 November 2025

Total Sample

42 documents

Methodological Caveat

During collection, searches returned approximately 700 entries, many of them duplicated across keywords or replicated on different portals. Most consisted of news items, indirect mentions, or content that did not constitute direct state action. Therefore, we applied criteria of relevance and materiality that inevitably involve analytical interpretation. To mitigate bias, one researcher reviewed all entries and her selection was validated by another researcher. When in doubt, the entry was kept in the dataset. The materiality analysis was applied with greater flexibility due to the low number of results passing this filter. Even so, it is possible that government actions not published on Gov.br were not captured. For this reason, while the sample is methodologically robust for the purposes of this study, it should not be considered exhaustive.

2. Data Analysis

The data evaluation was conducted in two parts: the first, using the technique of **content analysis**, and the second, using the technique of **discourse analysis**.

2.1 Content Analysis

The content analysis, with a descriptive approach, focused exclusively on the official text presented by the respective agency (e.g., normative text, official communication, etc.), without analyzing possible intentions or motivations of the agency, allowing for a more objective systematization aligned with the purpose of the study.

The basic descriptive codes defined deductively were:

- / **Date**
- / **Keyword**
- / **Responsible Agency**
- / **Type of Action** — Judicial or Administrative Actions, Normative Acts, Communication Campaigns, Official Communication, Official Event, Manuals and Guides, Police and/or Enforcement Operations, Strategic Plans and Agendas, Awards

2.1 Data Analysis

2.1.1 Influencers are...

The classification of “influencers are treated as...”, used as a reference in slide 10 and the following slides, was conducted through semantic coding at three levels, ultimately divided as follows:

agent for public communication

actions in which the Executive Branch mobilizes digital influencers as strategic extensions of its institutional communication, using them to expand reach, translate public policies, engage specific audiences, or humanize government campaigns.

Inclusion Criteria: participation of influencers in health, education, human rights, tourism, or social policy campaigns; official partnerships, invitations, awards, campaigns, and events in which influencers act as spokespersons; creation of public communication materials adapted for creators.

Exclusion Criteria: situations of regulatory or criminal accountability (classify as “subject to legal accountability”); documents dealing only with protective guidelines without active influencer use (classify as “risk and object of regulation”).

subject to legal accountability

Situations in which the digital influencer is framed as a legally responsible agent for illicit or irregular conduct, being the target of investigations, administrative proceedings, lawsuits, and civil or criminal penalties.

Inclusion Criteria: Police operations involving influencers; enforcement actions (Federal Revenue Service, IBAMA, Federal Police); Lawsuits brought by the Federal Government (e.g., AGU requesting right of reply); Environmental, tax, criminal, or consumer-related penalties directed at creators.

Exclusion Criteria: General warnings not tied to a specific case; Educational campaigns on risks (classify as “agent for public communication” or “risk and object of regulation”).

risk and object of regulation

Actions that treat influencers as potential vectors of social, cultural, economic, or rights-protection risks — requiring state guidance, containment, surveillance, or regulation.

Inclusion Criteria: Documents mentioning risks to children, adolescents, health, human rights, or digital security arising from influencer activity; Guides, technical notes, alerts, and regulatory guidelines; Platform-coordinated campaigns (e.g., against scams) focused on harm mitigation.

Exclusion Criteria: Use of influencers for positive campaigns (classify as “agent for public communication”); Cases of concrete punishment (classify as “subject to legal accountability”).

2.1 Data Analysis

educational actor

Cases in which influencers are recognized by the state as pedagogical agents capable of supporting educational policies, building social skills, conveying literacy (financial, media, scientific), or promoting public learning.

Inclusion Criteria: Actions in which influencers are part of media, financial, scientific, or civic literacy strategies; Invitations and initiatives in which creators are treated as educators or knowledge facilitators; Events or programs that associate creators with science communication.

Exclusion Criteria: Purely informational campaigns without a pedagogical purpose (classify as “agent for public communication”); Regulations on disinformation or risks (classify as “risk and object of regulation”).

instrument of cultural diplomacy and soft power

Situations in which influencers are incorporated by the Executive Branch as agents of international projection, cultural representation, national image, or multilateral relations — as part of soft power.

Inclusion Criteria: International events (e.g., G20, COP, multilateral meetings); Cultural promotion strategies, international tourism, or national branding using influencers; Diplomatic actions that mobilize creators as country representatives or cultural amplifiers.

Exclusion Criteria: Domestic campaigns without an international projection dimension; Events restricted to internal public communication.

phenomenon requiring state mediation

Cases in which the Executive Branch recognizes digital influence as a relevant social phenomenon requiring **institutional structuring, regulation, registries, official classifications, administrative procedures or formal regulatory mechanisms** — even when no punishment or public communication is involved.

Inclusion Criteria: Creation of official registries, databases, or systems for influencers; Inclusion of influencer activity in official classifications, internal regulations, public notices, or cultural policies (e.g., CBO, classifications, notice categories); State guidelines organizing the relationship between influencers and the state (e.g., SECOM with formal guidelines); Occupational, tax, social security, or cultural recognition through technical instruments.

Exclusion Criteria: Cases of legal accountability (classify as “subject to legal accountability”); Public communication actions (classify as “agent for public communication”).

2. Data Analysis

2.2 Discourse Analysis

This study uses the perspective of **Critical Discourse Analysis** (CDA), a methodology that understands discourse as a social practice and examines the relationship between language and ideological constructions. The choice of this approach stems from the need to go beyond the mere counting of propositions in order to investigate how the Executive constructs and contests meanings around the figure of the digital influencer.

To enable a systematic and comparative interpretation, we grouped the codes into the same **semantic dimensions** (professionalization, popularity, commodification, vulnerability, social risk, and criminalization) used in the [Feed to the Plenary](#) study, which emerged from the qualitative analysis of approximately 153 different propositions. This method allows for mapping the predominant discursive cores, their contradictions and absences, ensuring transparency in the transition from empirical data to critical interpretation.

3. Bias Reduction Procedures

We acknowledge that all research, especially qualitative research, is subject to inherent biases, and we sought, to the best of our ability, to exercise continuous reflexivity throughout the study, questioning possible influences of our own perspectives and understandings on the data. In addition, we adopted a series of measures to mitigate subjectivity in the interpretation and analysis of the data:

- / **Double Validation at Critical Stages**

For the data analysis stages, a cross-validation process was adopted. Two researchers reviewed the selection of entries and argument codings.

- / **Record-Keeping and Transparency in the Coding Process**

During the coding stage, we maintained detailed records of all file versions, preserving the history and enabling more systematic review.

- / **Adoption of Predefined Criteria**

The criteria for the classification in item 2.1 were established in advance, based on theoretical frameworks. These criteria were shared among researchers before the actual classification process began and were adjusted only in cases where deductive classifications were notably insufficient.

4. Other Information

4.1 Other Methodological Limitations

Interface Limitations: The structure of official websites may impact the availability or visibility of documents throughout the analyzed period. Results sometimes repeated when navigating between result pages. No manual count of the resulting entries was performed.

Non-Implemented Actions: The study analyzes published documents, not their implementation. The existence of a normative act does not guarantee that the corresponding action was implemented.

4.2 Personal Data Protection

This research did not directly involve the processing of personal data. The documents used consisted exclusively of bills made available on Brazilian legislative websites.

4.3 Software Use

SOFTWARE	USE IN THE RESEARCH
MS Office Suite	text editing, spreadsheets, and graphs
ChatGPT 4o	<i>brainstorming</i> , information systematization, data structuring, graph editing, organization of pre-textual elements, ABNT review, adaptation to the <i>Reglab Writing Manual</i> Reglab.
Notion	text editing, data and file organization, graph editing
Perplexity	additional source research and bias reduction.
Wordclouds	creation of word clouds

5. Ethical Guidelines

This research was funded by YouTube Brasil Ltda. To ensure the integrity of this work, **the authors developed, conducted, and analyzed the study independently**, without any contribution or interference from the company, which also did not influence or interfere in the interpretation of the results. The authors maintain full professional independence and responsibility for the content and conclusions of this work.



Respect for Privacy and Confidentiality: The data used are in the public domain and were obtained from accessible sources, without violating the privacy or confidentiality of any individual or institution.



Responsible Use of Public Data: Although the analyzed data are public, their use was conducted in a responsible and ethical manner, with the exclusive objective of independent research.



Methodological Transparency: The research methodology was detailed to ensure transparency and replicability, contributing to scientific integrity and enabling independent validation of the results.



Non-Discrimination and Respect for Diversity: The research was conducted in a manner that respects diversity and avoids any form of discrimination.



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