

**Written Submission for the
2026 Pre-Budget Consultations**

Submitted by:

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Submitted to:

Department of Finance Canada

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Recommendations

Recommendation 1: That the Government of Canada maintain durable, legally enforceable Canadian content contribution obligations on online streaming services under the *Online Streaming Act*. (Lead: Finance Canada, Canadian Heritage)

Recommendation 2: That the Government of Canada protect Canadian Performers from Artificial Intelligence by:

- a. Implementing an opt-in system to ensure that no performer's name, image, voice, likeness or recorded performance may be used to train AI systems or generate AI-derived content without their free and informed consent.
- b. Ensuring any authorized use of a performer's voice, face or likeness result in fair and ongoing compensation.

Recommendation 3: That the Government of Canada amend the *Copyright Act* to provide audiovisual performers with the moral rights equivalent to those already accorded to sound recording performers. (Lead: Global Affairs Canada, Canadian Heritage)

Recommendation 4: That the government exempt the first \$15,000 of annual professional artistic income from federal income tax and implement a four-year income averaging mechanism for professional performers. (Lead: Finance Canada)

Recommendation 5: That the government fully operationalize the *Status of the Artist Act* by requiring all producers of Canadian content who receive federal funding to adhere to the terms of collective agreements negotiated by ACTRA and other unions and guilds with bargaining rights. (Lead: Canadian Heritage)

Recommendation 6: That the government direct the Treasury Board to ensure all federal government advertising and filmed productions are produced with unionized workers and signatories to ACTRA collective agreements. (Lead: Treasury Board Secretariat)

Canada's Screen Industry Under Pressure

[The Alliance of Canadian Cinema, Television and Radio Artists](#) (ACTRA) represents more than 30,000 professional performers working in English-language recorded media across Canada. ACTRA members are actors, recording artists, comedians, stunt coordinators, dancers, narrators, choreographers, models, singers, background performers and more. Since 1943, ACTRA has advocated for the rights, livelihoods and creative futures of Canada's performing artists.

Canada's screen industry is a cornerstone of our economy and our identity. According to the [CMPA's Profile 2025](#), the industry generated \$10.17 billion in production volume in 2024-25, contributed \$11.72 billion to Canada's GDP and supported 181,360 jobs.

But the headline figures conceal the problem. All of the growth is foreign. Foreign location and service production rebounded 9.5% to \$5.32 billion, while Canadian content production declined 2.2% to \$3.62 billion. Canadian content now accounts for 40% of production activity against 60% foreign service work; a reversal of the 53% to 47% split of a decade earlier. Employment tells the same story: foreign service production added jobs, while employment in Canadian television fell 6.6% and in Canadian theatrical feature film fell 8.4%.

Canada is becoming a country where films get made rather than a country where Canadian stories get told. That is the trend Budget 2026 must reverse.

The pressures are compounding. Declining broadcasting revenues and reduced Canadian broadcaster commissioning have slowed domestic production. An unpredictable trade relationship with the United States has left stakeholders and investors across North America's screen ecosystem delaying decisions as they wait for stability and certainty. And in June, the federal government signalled its intention to remove the single most significant new source of funding for Canadian content.

Budget 2026 is an opportunity to respond with measures that strengthen economic growth, improve affordability for working Canadians, and support the next generation of Canada's creative workforce. ACTRA is pleased to present the following recommendations.

Recommendation 1: Uphold Canadian sovereignty by implementing the Online Streaming Act in full and upholding the CRTC's May 21 decision. Canada's performers, who tell Canadian stories and represent our country onscreen across Canada and around the world, are an integral component of our sovereignty. The Government of Canada confirmed the fundamental nature of culture's role in our nation by walking away from a trade deal that would undermine both Canadian culture and our national sovereignty on August 21, 2026. ACTRA commends the government for making this decision and standing up for Canada's culture.

However, in response to trade pressure from the United States, the Government of Canada had already rescinded a central pillar of our sovereignty; the CRTC's May 2026 decision setting the base contribution requirements for international streamers at 15% of

their Canadian revenues and eliminating the base contribution requirement. In its place, the Government of Canada announced an annual \$600 million investment supported by the Canadian taxpayer. This does not correct the underlying imbalance. Major international streaming services continue to profit significantly from the Canadian market while being relieved of their obligation to contribute directly to Canadian content, leaving Canadian taxpayers to make up the difference.

ACTRA's position is straightforward. A regulated contribution framework is durable and legally enforceable. An annual appropriation is neither. Discretionary funding is subject to fiscal pressure, shifting priorities and external political pressure in a way that a statutory obligation is not, and every producer, performer and crew member planning work beyond the current fiscal year now has to price that risk in. [ACTRA has joined 50 organizations](#) across Canada's cultural sector in making this case directly to the Prime Minister.

Canada must not concede the requirement for international streamers to invest in Canadian content to the United States. ACTRA urges the Government of Canada to champion our culture by upholding the Online Streaming Act in full.

The *Online Streaming Act* remains a landmark achievement and the most significant update to Canada's broadcasting policy in three decades. Weakening it to accommodate American trade interests is a betrayal of the Canadian performers who live and work in this country, and undermines the sector that brings Canadian stories – *Heated Rivalry*, *Kim's Convenience*, *Schitt's Creek* and *North of North* – to screens around the world.

Recommendation 2: Protect Canadian Performers from Artificial Intelligence by:

- a. Implementing an opt-in system to ensure that no performer's name, image, voice, likeness or recorded performance may be used to train AI systems or generate AI-derived content without their free and informed consent.
- b. Ensuring any authorized use of a performer's voice, face or likeness result in fair and ongoing compensation.

Artificial Intelligence systems can now replicate a performer's voice, face and likeness with alarming accuracy. They can digitally replace an actor in a production, recreate a deceased performer without consent, or generate entirely synthetic performances that displace real Canadian artists and threaten their livelihoods.

ACTRA members are deeply concerned. [94% of ACTRA members](#) are worried about AI-related job displacement, and 25% have already suffered economic harm from AI-generated uses of their work without consent, control or compensation. Workers across the country have already seen their likenesses used for degrading, harmful or illegal purposes, including unauthorized commercial exploitation.

Canada's National Artificial Intelligence Strategy, [AI for All](#), released on June 4, 2026, commits to privacy legislation that includes protections against deepfakes and to online harms legislation. It also establishes a \$50 million Creative Technology Program to support Canadian creators in using AI on their own terms. These are meaningful openings. But the strategy is silent on the underlying question of how performers will be protected from having their work used to build these systems without their consent.

Two baseline protections must be delivered.

First, no performer's name, image, voice, likeness or recorded performance may be used to train AI systems or generate AI-derived content without their free and informed consent – a standard consistent with Recommendation 1 c) in the Standing Committee on Canadian Heritage's report on Artificial Intelligence on the Creative Industries.

Second, any authorized use must come with fair and ongoing compensation – a principle reinforced by performer feedback shared in the government's October 2025 [AI Sprint](#).

AI must not be allowed to replace human performers or undermine their ability to earn a living from their craft. Technology should support human creativity, not displace the people whose talent and work make Canada's cultural industries possible. Performers must retain meaningful control over the use of their name, image, voice, likeness and recorded performances, including whether those elements may be used to create AI-generated or synthetic performances. These are not merely cultural sector concerns. They are fundamental questions of consent, identity and economic rights that affect all Canadians, with particularly profound consequences for performers whose identities and performances are their livelihoods.

Recommendation 3: Amend the *Copyright Act* to provide audiovisual performers with the moral rights equivalent to those already accorded to sound recording performers.

Under Canada's current copyright legislation, the moral rights of a performer, including their reputation and personality, are unprotected, thereby exposing their livelihoods to significant risk.

This absence is incongruent with protections afforded in the *Act* to "a performer of a live aural performance or a performance fixed in a sound recording" and subjects audiovisual performers inequitably to AI-related and other risks.

The Beijing Treaty on Audiovisual Performances establishes international standards for performers' rights in their audiovisual performances, including moral rights in their name, image, voice and likeness. Canada, unlike many of our international partners including the European Union, Japan and the Republic of Korea, has not yet acceded.

With the statutory review of the *Copyright Act* overdue, ACTRA urges the government to implement legislation extending equivalent moral rights protections to audiovisual

performers, including protections relating to their name, image, voice and likeness, and bring Canada's copyright regime into international alignment.

In a constrained fiscal environment, this is among the highest-value actions available to the government. Canada has the opportunity to set the example, and it's crucial to seize it.

Recommendation 4: Deliver Tax Fairness and Affordability for Artists

Performing is a profession, but it is not a conventional one. Most ACTRA members work contract to contract, with [income that can fluctuate dramatically from year to year](#) – one performer earning \$12,000 in one year and \$125,000 the next. A performer who lands a significant role one year and faces a lean year the next is taxed on that high income year at a punishing marginal rate, even if their multi-year average income is modest.

This is fundamentally inequitable, and it discourages talented artists from building sustainable careers in Canada, pushing some to pursue opportunities elsewhere in order to sustain their livelihoods. ACTRA is calling for two common-sense reforms, including the restoration of an income-averaging approach that has precedent in Canada's federal tax system.

First, the first \$15,000 of annual professional artistic income should be exempt from federal income tax. This is an affordability measure aimed squarely at low-income workers. It would support emerging performers at the most precarious stage of their careers, help experienced artists sustain their work in Canada, and recognize the unique economic reality of artistic employment.

Second, the government should introduce a four-year income averaging mechanism allowing professional performers to average their earnings for tax purposes, smoothing the peaks and valleys that define a career in the performing arts. Averaging is substantially a timing measure rather than a permanent reduction in the tax base, and should be costed as such.

Neither measure is novel. Quebec already provides a [deduction for copyright income](#) of up to \$15,000, on a sliding scale to \$60,000, available to performing artists as first owners of copyright, alongside a deduction for income-averaging annuities. Ireland exempts creative artists' income up to €50,000. Canada has a working domestic precedent to draw on, and the administrative design questions have already been answered by a Canadian tax administration.

Critically, these reforms should apply to all professional artistic income earned by Canadian performers, wherever in the world that income originates. Canadian performances are consumed globally. A Canadian actor who earns residual or use-fee income when their work is exhibited or streamed to audiences in the United Kingdom, Japan or Brazil is still a Canadian artist earning professional artistic income.

We cannot claim to support Canadian performers at home while ignoring the global market in which they actually earn their living.

Recommendation 5: Operationalize the Status of the Artist Act

As a member of the [Film & Television Alliance for Industry Responsibility \(FAIR\) Coalition](#), composed of Canada's eight largest unions and guilds representing over 87,000 artists, ACTRA urges the Government of Canada to operationalize the *Status of the Artist Act*.

When federal funding flows to producers of Canadian content, there is no systematic requirement that those producers adhere to the collective agreements negotiated by ACTRA and other unions and guilds with bargaining rights. A recent report indicates that **27% of productions with budgets over \$5 million and 63% of those under \$1 million are not signing collective agreements**, leaving film and television professionals working in Canada unprotected.

The case for this recommendation is even stronger in light of the government's proposed \$600 million annual investment in Canadian content. If public funding is to replace contribution obligations previously imposed on streaming platforms, that funding should come with clear labour standards. Without such conditions, federal dollars may support productions that do not adhere to the collective agreements negotiated by ACTRA and other unions and guilds.

Implementing this recommendation would bring federal funding agencies, including Telefilm Canada, the Canada Media Fund and the National Film Board, into alignment. It would ensure that Canadian taxpayer dollars support fair working conditions, fair compensation and stronger labour standards across the industry. And it would give the public a defensible answer to the question of what it is buying.

Recommendation 6: Apply Unionized Procurement Standards to Government Productions

The federal government produces a significant volume of advertising, public information campaigns and other filmed content every year. When government agencies do not adhere to collective agreements, they implicitly endorse unfair and exploitative labour practices.

ACTRA strongly recommends that the Treasury Board Secretariat introduce requirements directing Public Services and Procurement Canada and all other relevant departments and agencies to work exclusively with agencies and production partners that hire unionized performers and respect applicable ACTRA collective agreements.

The government speaks regularly about its commitment to workers' rights, fair wages and the creative economy. Ensuring that its own productions live up to those values is the least it can do. This measure would immediately direct federal spending toward professional Canadian performers working under fair collective agreements, at no incremental cost, and would set an important example for the broader industry.

Conclusion

Canada's cultural sovereignty does not sustain itself. It is created and maintained every day by the working performers, storytellers and artists who choose to build their careers here.

Budget 2026 is an opportunity to take concrete action. The Government of Canada can keep Canadian content obligations durable, protect Canadian performers from the unchecked exploitation of Artificial Intelligence, amend the *Copyright Act* to protect the moral rights of audiovisual performers, deliver tax fairness for artists, and ensure federal funding and federal productions model the labour standards Canada expects of others.

ACTRA's members tell Canadian stories. They are Canadian culture. The recommendations in this submission are reasonable, practical and long overdue.

ACTRA would welcome the opportunity to discuss these recommendations further with officials at the Department of Finance.

In Solidarity,

Eleanor Noble

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