

ALLIANCE OF CANADIAN CINEMA, TELEVISION AND RADIO ARTISTS

ACTRA

Submission to the Government of Canada

Consultation on AI Transparency

Enhancing trust in artificial intelligence through increased transparency

Submitted to the Department of Innovation, Science and Economic Development Canada

September 2026

About ACTRA

ACTRA (Alliance of Canadian Cinema, Television and Radio Artists) is the national union of professional performers working in English-language recorded media in Canada – film, television, radio, digital media, video games and sound recording. ACTRA’s over 30,000 members are actors, recording artists, comedians, stunt coordinators, dancers, narrators, choreographers, models, singers, background performers and more. We represent professional artists whose livelihoods and creative contributions form a vital part of Canada’s cultural and creative economy.

Two of our bodies pay performers for the use of their work. The ACTRA Performers’ Rights Society (PRS) collects and distributes use fees, royalties and residual payments. Its Recording Artists’ Collecting Society (RACS) represents some 15,000 recording artists directly and tens of thousands more through international partnerships, and pays performers around the world when their recordings are used in Canada. Between them they do, every day, the work of figuring out whose performance is in a piece of recorded media and getting money to that person.

ACTRA welcomes the opportunity to participate in the Government of Canada’s consultation. The member figures we cite come from two places. *Shifting the Lens: A Survey for Canadian Screen Performers* was run for ACTRA by Abacus Data, with 886 members responding in November and December 2025 about their work in 2024. This was an opt-in survey; the findings describe respondents and should not be treated as a representative estimate for all members. Figures on performance categories come from our 2021 Census. We would be glad to share either in full.

Summary

Canada’s screen industry is a cornerstone of our economy and our identity. According to the CMPA’s 2025 report, Canada’s screen industry generated \$10.2 billion in production volume, contributed almost \$12 billion to Canada’s GDP and supported over 180,000 jobs. Foreign location and service production grew 9.5% over the previous year, to \$5.3 billion in 2024–25.

Canada’s screen industry and its performers now face a serious challenge – unregulated generative artificial intelligence, whose rapid development and adoption across the industry places the careers of Canada’s performers at risk. AI-generated media, including deepfakes that recreate an actor’s voice, face, gesture or performance style, poses direct risks to performers and their livelihoods. If left unregulated or under-regulated, these technologies could improperly substitute or replicate artists without their consent or fair compensation, undermining employment opportunities and bargaining power.

ACTRA’s position is that performers must be able to give informed consent, control the use of their voice, likeness and performances, and obtain fair compensation. Mandatory transparency must provide the information needed to exercise these rights and enforce applicable protections. Transparency alone does not authorize a use, compensate a performer or resolve a dispute. It must support existing rights and collective agreements while helping identify gaps that require further reform.

A label tells an audience that a performance was synthetic. It does not help the performer whose voice was reproduced without permission. Provenance metadata – the record of how a file was made, carried with the file – can help identify how content was created or modified. It does not compensate the rightsholder.

But nothing else works without it. Until developers have to say what their systems were built from – what the discussion paper calls input transparency – consent and payment stay theoretical, because the moment that would set them in motion goes by unnoticed. That is why we think these questions are urgent rather than preliminary.

Our members’ experience demonstrates both suspected unauthorized use and uncertainty about how their work is being used.

WHAT ACTRA MEMBERS REPORT — SHIFTING THE LENS, 2025

- 5% believe their voice or likeness was used to create AI-generated content without their express consent.
- 14% do not know whether it was. Together with the 5% above, that is nearly one member in five who cannot say what happened to their own likeness.
- 9% were asked for consent and agreed; 6% were asked and declined. Among background performers, 27% agreed – three times the overall rate.
- 80% are highly concerned about a lack of transparency or consent around AI use – their single highest-ranked concern, ahead of regulation, job loss and unauthorized use.

That 14% is the most important number in this submission. It measures, directly, the gap this consultation is about – and nothing but transparency will close it.

Three points run through the answers that follow.

AI content built from a real person needs specific safeguards. Content that reproduces an identifiable person’s voice, likeness or performance requires specific disclosure safeguards. Those safeguards must complement training data transparency for all protected performances, including those that cannot be identified in an output. Protecting recognizable replicas must not narrow the rights of other performers whose work contributed to a system.

Saying what went in is not the same as giving away how it works. The discussion paper treats protection of trade secrets as a reason to be careful about input transparency, and that concern is fair. But two different things are being run together. How a system is built – its design, its methods, its internal settings – is genuinely commercial property, and we are not asking for it. A list of the material a system was trained on tells you nothing about how it was built. The European Union has already separated the two in practice.

Rules written for users will miss the people most affected. Most thinking about transparency pictures someone making a decision – whether to trust a chatbot, rely on an answer, buy a tool. A performer whose voice has been copied made no decision. They never used the system, never agreed to anything, and have no relationship with the company that built it. One test the Government could apply to any

measure it is weighing: ask who is affected by it, and whether some of them are outside the transaction altogether.

Recommendations

ACTRA's four priorities are meaningful training data disclosure (Recommendations 5 and 6); informed consent at capture and reuse (Recommendation 9); traceable synthetic content (Recommendations 1 to 4); and accessible enforcement (Recommendations 6 and 7). Recommendations 8 and 10 to 12 provide supporting measures. The numbering below follows the consultation responses. International references appear in Annex A.

	Recommendation	See
1	In any AI transparency legislation or regulation, define AI-generated content that reproduces the voice, likeness or performance of an identifiable person as a separate class of content, carrying its own disclosure requirement that applies whether or not the content is deceptive, commercial or newsworthy.	Part 1
2	Give each company in the chain a duty it can actually carry out: developers mark content when it is made, platforms show a visible label where people see it, and nobody in between may strip the marking out – including when one AI system hands work to another. Start with audio and video.	Part 1
3	Require a free, public tool that lets anyone check whether a piece of content was AI-generated, as California does, so the marking is useful to an individual and not only to a platform.	Part 1
4	Where an AI system uses a voice or likeness derived from a real person, require disclosure of that fact – not only that the system is automated.	Part 2
5	Require developers of general-purpose AI models offered in Canada to publish what they trained them on, using a standard form issued by government, as the EU does.	Part 3
6	Give rightsholders a way to ask about specific works – a named contact, a set process and a duty to answer – so the published summary is something they can actually act on.	Part 3
7	Treat the unauthorized AI reproduction of a real, identifiable person as a serious AI incident, and look for these harms proactively rather than waiting for reports.	Part 4
8	Break the resulting data down by performance category and by demographic group when publishing it, with the usual protections where numbers are small.	Part 4
9	Tell performers what a scan is for. When someone is scanned or recorded for AI purposes, they should be told what it will be used for, for how long, and whether it may be used to generate performances later.	Part 6
10	Size the obligations to what the company disclosing can bear – and to what the person affected can bear. Performers are the smallest businesses in this chain.	Part 6
11	Accede to the Beijing Treaty on Audiovisual Performances.	Part 6

	Recommendation	See
12	Set a federal floor to keep the rules consistent across jurisdictions, since performers routinely work across provincial lines.	Part 6

Part 1: AI-Generated Content

1.1 *Would it help you trust what you see online if you could tell whether something was created by AI or by a person? When and for what kinds of content is it most important to know if something was created or modified by AI?*

Yes. For audiences, it matters most with audio and video, where AI output is most convincing. For performers, the priority is narrower: content that reproduces the voice, face or performing style of a real, identifiable person.

A performer’s professional identity is the instrument of their livelihood. When it is reproduced without permission, the consequences run past audience confusion to lost engagements, reputational and professional harm, and the use of something built over a career.

In practical terms, we are asking that any AI transparency legislation or regulation treat this material as a separate class of content rather than folding it into a general AI-content definition. A general definition invites a disclosure trigger tied to whether content is misleading. Content built from a real person should carry a disclosure requirement of its own, which applies whether or not the content is deceptive, commercial or newsworthy, because the interest being protected belongs to the person depicted rather than to the audience.

Other jurisdictions have taken this approach. Tennessee’s ELVIS Act treats voice as a protected property interest. California has legislated on digital replicas in performer contracts and on deceased performers’ likenesses. Denmark has proposed copyright-based rights over one’s own likeness. Each concluded that identity-derived synthetic content merits distinct treatment, and ACTRA urges the Government of Canada to take the same approach for both actors and musicians.

RECOMMENDATION 1

In any AI transparency legislation or regulation, define AI-generated content that reproduces the voice, likeness or performance of an identifiable person as a separate class of content, carrying its own disclosure requirement that applies whether or not the content is deceptive, commercial or newsworthy.

1.2 and 1.3 *What would best help Canadians determine when content is AI-generated? Who in the AI value chain should be responsible for providing transparency around AI-generated content, and why?*

AI systems used in creating, editing, modifying or distributing media content must be auditable and sufficiently transparent. ACTRA recommends a comprehensive approach to transparency, implemented throughout the value chain and in alignment with the EU AI Act.

First, the provider of an AI system should ensure that synthetic audio and video outputs carry machine-readable indications of their origin. Standards should support interoperable provenance information and effective detection while allowing the technical methods to evolve. Markings can help establish origin; they do not, by themselves, establish whose performance was used or whether that use was authorized.

Second, the platform or deployer of the AI system includes a visible label identifying content as AI-generated. The metadata above is invisible to an ordinary viewer; only whoever is distributing the content controls what the audience actually sees.

Third, the Government of Canada must ensure that nobody in the value chain may strip the provenance metadata. The Copyright Act stops anyone removing or altering the rights information attached to a work, and the principle is the same one: the information travelling with a file is part of what makes the file traceable. Provenance metadata deserves the same protection.

A duty confined to one part of the chain would leave clear gaps. Bill C-34's synthetic content labelling requirement applies to operators of regulated social media services, so an AI voice used in an advertisement, an automated phone line or a video game is covered by nothing at all. C-34 was written with different harms in mind, and we raise it only because this consultation is a timely opportunity to address the rest of the chain.

RECOMMENDATION 2

Give each company in the chain a duty it can actually carry out: developers mark content when it is made, platforms show a visible label where people see it, and nobody in between may strip the marking out – including when one AI system hands work to another. Start with audio and video.

1.4 *Do existing market practices, technical tools, and legal frameworks make it easy enough to know when content is AI-generated? If not, where do gaps remain and what actions should the Government take?*

Voluntary marking has been taken up unevenly. [Canada's Voluntary Code of Conduct on the Responsible Development and Management of Advanced Generative AI Systems](#) asks developers to provide a reliable, free way of detecting AI content, but the Code cannot be enforced and take-up varies. No Canadian law we are aware of stops someone stripping the marking out once content exists.

Internationally, several measures exist. China and South Korea both require marking at national scale. In California, companies are required to embed hidden markings and to also provide a free, public tool that anyone can use to check a file. ACTRA recommends the Government explore a comparable measure, and that, to ensure performers have the capacity to prove their likeness has been used, this information remain publicly accessible.

However, as outlined in the discussion paper, ACTRA recognises that extensive labelling can be difficult and costly to implement. As such, we recommend the Government of Canada prioritise labelling initiatives which involve recognisable deepfakes of existing performers and real people.

RECOMMENDATION 3

Require a free, public tool that lets anyone check whether a piece of content was AI-generated, as California does, so the marking is useful to an individual and not only to a platform.

Part 2: AI Interaction

The synthetic voices used in customer service, automated phone systems, in-car assistants and companion apps are often built from recorded human performance. ACTRA asserts that not only should users be informed when their counterpart is AI-generated, but they should be informed of whose voice they are hearing.

Where a system uses a voice or likeness derived from a real, identifiable person, disclosure should cover that fact as well. Someone told they are speaking with an automated assistant, in a voice they recognize from film or television, has an accurate answer that still leaves a false impression in place.

On who should be responsible: the business deploying the system, in the first instance, since it chooses the persona the system presents. Developers should have to build systems capable of disclosing in the first place, which is the approach the EU has taken.

On whether existing rules are enough: they address neighbouring questions rather than this one. Ontario's requirement covers hiring only. Bill C-34 covers chatbots pretending to be human, within the social media rules. Colorado, Maine, New York and Utah cover consumer-facing and companion AI.

RECOMMENDATION 4

Where an AI system uses a voice or likeness derived from a real person, require disclosure of that fact – not only that the system is automated.

Part 3: Information about AI Systems

3.1 *What kinds of information about AI would you like to know in order to make informed choices about when and how to use AI?*

What matters most to our members is the input data: what a system was trained on, where that material came from, and whether it includes copyright-protected work or recorded performances by identifiable people. For ACTRA, this matters most for the large general-purpose systems that can produce audio, images, video or a synthetic performance.

Who is in the training data also matters

AI systems reflect back whatever they were trained on. Where a community barely appears in the training material, two things follow.

Underrepresentation may contribute to stereotyped depictions or exclusion from generated scenes. And adding more material without appropriate consent and compensation is not an adequate solution: it may expose a performer to further unauthorized use or replacement.

That second point has a concrete form. A production that would otherwise pay for accessibility accommodations on set, or fund travel for an Indigenous elder from a community hours from the location, may find it cheaper to generate a performer instead. The performers with the fewest roles available to them are the ones for whom this substitution is most attractive to a producer and most costly to the individual. None of this is resolved by transparency alone, but none of it can even be identified without it.

3.2 *How can the Government best balance the need to increase transparency (including input transparency) against the need to protect confidential business information?*

How a system is built – its design, its training methods, its internal settings – is commercial property. What creators and rightsholders want is something different: a summary of what the system was trained on, meaning what kinds of work, from where, and whether any of it is copyright-protected.

The EU has shown the two can be separated. Under [Article 53\(1\)\(d\)](#) of the EU AI Act, developers of general-purpose models must make publicly available a sufficiently detailed summary of the content used to train the model, following a standard template issued by the European AI Office. Implementing a similar system here would bring Canada into closer alignment with our international counterparts, including the EU, and serve to keep costs down for developers.

A Canadian business that builds on a foreign-made model inherits the legal and reputational risk of decisions about training data it could not see and cannot check. Knowing what went in helps the Canadian company using the system just as much as the Canadian performer whose work may be inside it.

3.3 and 3.4 *Who is best placed to provide what information about AI systems? Are existing disclosure practices and legal frameworks sufficient? If not, what actions should the Government take?*

The developer, when it comes to training data – they are the only party who knows what went in.

As to whether current practice is enough: we are not aware of any Canadian requirement for a developer to say anything at all about training data. The documentation some publish voluntarily describes what a system can do, not what it was built from.

In alignment with the EU model, a standard template should at a minimum ask for the kinds of work used; where the material came from, at the level of the dataset, archive, licensor or supplier; whether

any of it is copyright-protected, whether it was licensed, and from whom; and whether it includes recorded performances by identifiable people.

A published summary also needs a way of asking follow-up questions – a named contact, a set process, and a duty to reply within a stated time.

RECOMMENDATIONS 5 AND 6

Require developers of general-purpose AI models offered in Canada to publish what they trained them on, using a standard government form. Give rightsholders a way to ask about specific works, with a duty to reply.

Three further points on this section

On identifiable performances. We have focused on cases where a particular person can be recognized, because that is what transparency measures can most readily reach. It is not a statement about what performers are owed. ACTRA's position, and that of our collecting societies, is that a performer should be paid whenever their work has been used to train a system or is reflected in what it produces – whether or not their individual performance can be picked out of the result.

On copyright. We ask only that whatever is built now still works once that question is answered. A disclosure system that cannot establish whether protected work was used will be of little help on the day the law changes, and getting the order right now saves rebuilding it later.

On administration. Licensing solutions can look as though someone would have to build the whole administrative apparatus from scratch. In Canada, most of it already exists. PRS and RACS collect and distribute money to performers today, including to performers in other countries whose work is used here. The practical knowledge of what you need to know to identify a recorded performance and get payment to the right person is already held in this country. What is missing is being told what the systems were trained on.

Part 4: AI Incidents

4.1 and 4.2 *Do the public and the Government have enough information about AI risks, incidents, and potential future harms? How should a serious AI incident be defined?*

Our survey identifies suspected unauthorized use and uncertainty: 5% of respondents believe their voice or likeness was used without consent, while 14% do not know. These findings are not verified incident counts. They demonstrate the need for an accessible process to obtain information, report concerns and establish what occurred.

Incident reporting should capture harms to performers' livelihoods and professional identities, alongside other AI risks. Published data should distinguish allegations, verified incidents and outcomes, so that the Government can assess both the problem and the effectiveness of its response.

On the definition: a serious AI incident should include creating or distributing AI content that reproduces a real, identifiable person's voice or likeness without permission, where it happens at scale or for commercial purposes. These are not isolated malfunctions. They are a recurring pattern that no current framework brings into view.

The discussion paper's own evidence makes the case. It cites the Canadian Anti-Fraud Centre on fake videos of well-known people promoting investment scams, an Ottawa couple who lost a large sum after acting on one, and a business survey in which faked documents and impersonated executives were among the most common methods. The technology behind those cases is the same technology affecting performers, except that for performers it is continuous rather than occasional. We find it hard to see a principled line that catches the fraud cases and leaves out the performer cases. The EU definition the discussion paper cites is built around death, health, critical infrastructure, fundamental rights and damage to property or the environment. Canada has the chance to think the category through rather than adopt that list as it stands.

4.3 Which actors are best placed to provide the most relevant information? Who should collect it and what should be done with it?

First, you cannot report what you never find out about. A performer who does not learn their likeness was misused has nothing to report. A system that waits for affected people to come forward will miss most of what it is meant to catch, because the affected person is usually the last to know. Some capacity to look for these harms, alongside a place to report them, would help. At the moment performers carry the cost of finding out themselves, and it falls hardest on those least able to carry it.

Second, the Government should designate a body to receive complaints, investigate compliance and coordinate referrals where other rights or remedies are engaged. The process should provide clear service standards, assistance for individual performers and a route for authorized union representation. Reporting should lead to an explanation of available enforcement or remedial steps, including referral for cessation, removal or compensation where the applicable law provides for them.

Third, whatever is collected should be broken down when it is published. A single national number would tell the Government that a problem exists without telling it where. Our own data shows why that matters: background performers report agreeing to AI capture at three times the rate of members overall. Breaking the figures down by performance category and by demographic group would show whether particular groups are being approached, or affected, more than others – and would show it early enough to do something. The usual protections apply: redact where needed, and withhold any figure based on too few people to publish safely.

RECOMMENDATIONS 7 AND 8

Treat the unauthorized AI reproduction of a real, identifiable person as a serious AI incident, and look for these harms proactively rather than waiting for reports. Break the resulting data down by performance category and demographic group when publishing it.

Part 5: AI Agents

ACTRA does not have a distinct position on this area and defers to respondents with direct operational experience. The point most relevant to our members – that provenance information must survive transfers between automated systems – is addressed in Recommendation 2.

Part 6: Broader considerations

6.1 *When is AI transparency most important, and are there any areas where action would be premature? Are there other areas that should be considered for action to enhance AI transparency?*

Transparency is particularly important for performers affected by systems they did not choose to use. Obligations should address their ability to obtain information and exercise rights, as well as the needs of the businesses and audiences using AI.

One area we would add: transparency at the point of capture

The consultation asks whether other areas should be considered, and we would raise one that none of the five covers. The discussion paper is concerned with what people are told about outputs – whether content was AI-generated, whether a system is automated, what it was trained on. There is an earlier moment that matters just as much to the people we represent: the moment a performer’s voice or face is captured in the first place.

Performers on Canadian sets are being scanned. Our members report being asked to agree to it, and background performers report it at three times the rate of members overall. What they often are not told is what the scan is for. A scan taken to solve one visual effects problem and a scan taken to build a reusable digital double look identical to the person standing in front of the camera rig. Someone asked to agree in those circumstances is not really agreeing to anything in particular.

Disclosure should identify the intended uses, duration of retention, who may access the material, any onward transfer and whether new performances may be generated. Performers should receive a usable record of the agreed scope. Further uses outside that scope should require further authorization, with applicable compensation terms and collective agreement protections preserved.

RECOMMENDATION 9

Tell performers what a scan is for. When someone is scanned or recorded for AI purposes, they should be told what it will be used for, for how long, and whether it may be used to generate performances later.

6.2 *How should any measures account for the circumstances of small and medium-sized enterprises?*

Professional performers are overwhelmingly self-employed individuals and one-person businesses. They are the smallest operations anywhere in this chain, and they carry the cost of enforcing their own rights with no legal department and no compliance staff.

Performing is a primary livelihood for a substantial share of our members, and the survey also illustrates the limited resources many have to investigate and challenge unauthorized use.

PERFORMER EARNINGS — SHIFTING THE LENS, 2025

- For one in three ACTRA members, performing provides more than half of their total annual income.
- 70% earn less than \$20,000 a year from on-screen work, and 39% earn less than \$5,000.
- Background work is the primary category for 38% of Indigenous members and 34% of ethnically diverse members, 30% of members living with a disability, and 34% of members over 55 (2021 ACTRA Census).

Low earnings are a sign of precarity, not of low stakes. For performers already working at the margins, losing roles or having their likeness used without payment removes income they can least afford to lose, and leaves them with the least capacity to do anything about it.

Obligations should therefore be sized with both sides in mind. A developer selling models worldwide can absorb the cost of publishing what it trained them on. A performer earning under \$5,000 a year cannot absorb the cost of finding out, on their own, that their work was used – let alone of doing anything about it.

Background work is where AI scanning is most concentrated, and it is the main category of work for a disproportionate share of Indigenous, racialized and disabled performers, and of performers over 55. An exemption written to spare the company doing the disclosing would, in practice, move the burden onto the performers least able to carry it.

RECOMMENDATION 10

Size the obligations to what the company disclosing can bear – and to what the person affected can bear. Performers are the smallest businesses in this chain.

6.3 and 6.4 How should Canada ensure coherence between federal, provincial and international frameworks? How can measures account for the ongoing evolution in AI technologies?

ACTRA recommends that Canada accede to the Beijing Treaty on Audiovisual Performances and implement the domestic measures needed to give effect to its protections. This is a complementary performers' rights reform that would strengthen the framework within which transparency operates.

The submission's transparency proposals should work alongside a review of protections for audiovisual performances, including performances incorporated into soundtracks. The review should identify specific gaps in economic and moral rights and distinguish them from protections already available under copyright, contracts and other applicable law.

The WIPO Performances and Phonograms Treaty is relevant alongside it, particularly its moral rights provisions for performers. How those provisions relate to remedies for unauthorized synthetic reproduction is one of the questions such an assessment should address. Annex A sets out the specific measures we suggest Canada draw from.

Domestically, provinces are already acting. Ontario’s Working for Workers Four Act requires disclosure of AI use in hiring, and the Enhancing Digital Security and Trust Act addresses public sector AI accountability. A federal floor would support consistency. Performers work across provincial lines routinely – an engagement in Toronto, a session in Vancouver and a shoot in Winnipeg within one year is unremarkable – and a province-by-province approach would be hard for a workforce that mobile to navigate.

The core duties should be set in law, with technical standards that can be updated as technology changes. Standards should specify the required disclosure and traceability outcomes, supported by consultation with performers, rightsholders and technical experts. Implementation should be reviewed against whether affected people can obtain useful information and enforce their rights.

RECOMMENDATIONS 11 AND 12

Join the Beijing Treaty on Audiovisual Performances. Set a federal floor so the rules stay consistent across the country.

Annex A: International measures referenced

Jurisdiction	Measure	What it requires	Supports
EU	AI Act, Art. 50	Providers mark synthetic output in machine-readable form; deployers disclose deepfakes and direct-interaction systems.	Rec. 2, 4
EU	AI Act, Art. 53	Providers of general-purpose models publish a sufficiently detailed summary of training content, on a template issued by the European AI Office.	Rec. 5
California	AI Transparency Act	Latent disclosures in synthetic audiovisual content, a visible disclosure option, and a free public detection tool.	Rec. 3
California	Digital replica statutes	Restrict contractual terms permitting digital replicas of performers, and use of deceased performers' likenesses.	Rec. 1
Tennessee	ELVIS Act	Extends protection to voice as a distinct property interest.	Rec. 1
Denmark	Proposed copyright amendment	Would give individuals rights over their own likeness. Proposal, not yet law.	Rec. 1
China; South Korea	AI labelling measures; framework AI legislation	Require marking of AI output and clear indication of realistic synthetic audiovisual content.	Feasibility at national scale
Colorado, Maine, New York, Utah	Consumer-facing AI disclosure laws	Disclosure by developers or deployers of consumer-facing AI, companion chatbots and mental health chatbots.	Part 2 comparators
WIPO	Beijing Treaty on Audiovisual Performances	Economic and moral rights over audiovisual performances. Canada is not a party.	Rec. 11

Jurisdiction	Measure	What it requires	Supports
WIPO	Performances and Phonograms Treaty (WPPT)	Moral rights for performers, including the right of attribution.	Rec. 11

Conclusion

ACTRA welcomes the opportunity to contribute to Canada’s AI transparency framework.

Performers need to know how their work and identity are being used, give informed consent, negotiate fair compensation and enforce applicable rights. Mandatory training data disclosure, informed consent at capture and reuse, traceable synthetic content and accessible enforcement should form the core of the Government’s response. These measures should protect performers without narrowing existing rights or weakening collective agreements.

Transparency is not the whole of what performers need. But nearly one ACTRA member in five cannot say whether their voice or likeness has been used to generate AI content, and a performer who never learns their voice was used cannot agree to it, refuse it, be paid for it, or enforce any right over it.

ACTRA would welcome the opportunity to help officials design the disclosure template, inquiry process and reporting route proposed in this submission, and can contribute practical expertise on identifying performances and administering authorized payments.

Submitted on behalf of ACTRA

Alliance of Canadian Cinema, Television and Radio Artists