



Coalition
for the Diversity of
Cultural Expressions

Comments from the Coalition for the Diversity of Cultural Expressions

as part of the

*Consultation on the development of a Canadian code of practice for generative artificial
intelligence systems*

Presented to

Innovation, Science, and Economic Development Canada

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Presentation by the CDCE

The [Coalition for the Diversity of Cultural Expressions](#) (CDCE) brings together the main organizations of French-speaking and English-speaking professionals from the cultural sector in Canada. It is composed of about fifty organizations that collectively represent the interests of over 360,000 professionals and 2,900 companies in the sectors of books, cinema, television, new media, music, performing arts, and visual arts. The CDCE speaks as a coalition, following consultation with its members.

Equally concerned with the economic health of the cultural sector and the vitality of cultural creation, the CDCE primarily intervenes to ensure that cultural goods and services are excluded from trade negotiations and that the diversity of cultural expressions is present and protected in the digital environment.

It promotes the UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions and ensures its implementation to give it full force of application at the national level. It ensures that the government's ability to implement policies to support local cultural expressions is preserved and adequately deployed; that trade liberalization and technological development do not systematically lead to a homogenization of content and a disruption of local ecosystems in the face of foreign investments. The CDCE also provides the secretariat for the International Federation of Coalitions for Cultural Diversity (IFCCD).

1- Include culture in major reflections on AI regulation

The main objective of the CDCE is to ensure that Canada retains the sovereign right to develop, implement, and amend policies, programs, and measures necessary to guarantee an abundant supply of Canadian artistic expressions of all kinds, on all media, and from all communities. The CDCE also strives to protect and promote our artists and cultural industries, ensuring a rich diversity of cultural expressions in Canada and worldwide, including in the digital environment.

In this regard, the development by the Canadian government of a practical code to frame generative AI systems such as ChatGPT, Dall-E 2, and Midjourney is of great interest to our organization and all the members we represent.

Generative AI is already having a major impact on the cultural sector. Copyright-protected works and other objects are being used, usually without consent, credit or compensation, to drive machines. Secondly, AI-generated content raises numerous legal and ethical questions, touching on copyright, of course, but not only.

In this intervention, we do not wish to deeply explore all the challenges and issues facing the cultural sector since we understand that this is not the objective of this consultation, which primarily focuses on national security issues. We note that various selected stakeholders have been called upon to contribute during directed consultations, and to our knowledge, none of them were from the cultural sector.

Thus, we clearly wish to request a new round of consultation that specifically considers issues unique to the cultural sector.

We also note that each of the themes addressed in this consultation, namely safety, fairness and equity, transparency, human oversight and monitoring, validity and robustness, and accountability, resonates with concerns in the cultural sector.

The development of artificial intelligence has already impacted the diversity of Canadian cultural expressions and national cultural sovereignty. While the impacts we observe are largely negative, we are convinced that with adequate regulation, this development could instead strengthen our cultural ecosystem and amplify the diversity of our expressions. To achieve this, it is essential to include culture in any process of regulatory and legislative framework development and to ensure a plurality of voices is heard- and action needs to be taken quickly.

In this regard, we note that France has just acted in this direction, creating an expert group whose mandate is to "ensure the protection of copyright and related rights, value French and French-speaking cultural assets, and measure the impacts of AI on creative professions and the value chain¹" within the Strategic Council for Artificial Intelligence, as pointed out by our French counterpart, the French Coalition for the Diversity of Cultural Expressions. By doing so, France recognizes the need to include issues related to the diversity of cultural expressions in any reflection on AI.

Let's remember that Canada, the first signatory of the 2005 UNESCO Convention for the Protection and Promotion of the Diversity of Cultural Expressions, has traditionally played a leading role in this area. It must continue in this direction today.

We therefore invite the Ministry of Innovation, Science, and Economic Development to quickly survey the cultural milieu, include the sector in all its reflections on the subject, and plan the establishment of an expert group (also including members of civil society) devoted to the topic.

¹ <https://www.coalitionfrancaise.org/communiquede-presse-reglement-europeen-sur-lintelligence-artificielle-la-culture-et-le-droit-dauteur-ne-doivent-pas-etre-oublies/>