

FOR A SOVEREIGN AI IN CANADA: CULTURE AT ITS CORE



Coalition
for the Diversity of
Cultural Expressions

About

For 25 years, the [Coalition for the Diversity of Cultural Expressions](#) (CDCE) has served as the collective voice of Canada's cultural sector, representing both the English- and French-speaking markets. It brings together more than 50 organizations, representing over 350,000 creators and 3,000 cultural enterprises across the country.

The Coalition develops consensus-based positions on a range of issues affecting the economic health of the cultural sector, the treatment of culture in trade agreements, and the impact of the digital environment. In doing so, it works to ensure that Canadian public policies continue to protect and actively support our cultural ecosystems.

Our work is grounded in the [2005 UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions](#).

The sovereign right of States to adopt policies and measures to support their cultural industries is a fundamental principle enshrined in the Convention, which Canada was the first country to ratify. The Convention also recognizes the dual nature of cultural goods and services, acknowledging both their cultural and economic value. These principles are more relevant than ever, providing a framework for developing policies that foster technological innovation, economic development, and the vitality of cultural ecosystems.

AI for All: Culture Must Be Part of It Too

On June 4, 2026, the federal government unveiled Canada's National Artificial Intelligence Strategy, "AI for All," in response to the realities of a rapidly evolving world.

The Strategy acknowledges that artificial intelligence (AI) raises "hard questions about job security, privacy, sustainability, sovereignty and trust." These challenges, exacerbated by the accelerated and largely unregulated development and deployment of AI, are already affecting all segments of Canadian society, including the cultural sector, which nevertheless receives limited attention in the Strategy.

If the Strategy is to be truly "for all" and generate benefits for society as a whole, the CDCE believes that creators and cultural enterprises must be fully included. In this regard, this paper highlights several elements of the Strategy while putting forward recommendations aimed at clarifying and strengthening its relevance for the cultural sector. It also demonstrates how these proposals build on recent developments both in Canada and internationally.

The CDCE shares the Government of Canada's vision that "AI must also work for all Canadians, not the other way around. It must be put to work to grow our prosperity and wellbeing, promote our culture, and strengthen our communities". It also supports the statement that "Canadian AI must support, reflect, and project Canadian culture, which includes our customs, our history, and our heritage", and welcomes the recognition that "trustworthy and reliable AI needs a safety-first approach grounded in law (emphasis added).

However, while the Strategy emphasizes the strategic importance of data and its value "across health, energy, transportation, agriculture, natural resources, and other critical sectors," the role of cultural data is not explicitly recognized.

Yet these data, many of which consist of copyrighted works and protected cultural content, represent high-value assets for Canada and therefore constitute an essential foundation for building AI systems that are truly sovereign and reflective of Canadian culture.

Furthermore, the Strategy highlights the “Scaling Canadian Champions” as an opportunity for Canada to “to shape how AI is built, the leverage to protect Canadian interests, and the prosperity that comes from owning what it invents.” The CDCE supports this vision and believes that the government has a responsibility to help “shape Canadian champions” that build businesses which respect copyright and promote the diversity of cultural expressions.

Finally, the CDCE welcomes the establishment of a \$50 million Creative Technology Program over five years to support Canadian creators in using AI according to their own terms.

Four Commitments to Enhance the Value of Canadian Cultural Data

To foster innovation and the adoption of AI in the cultural sector, it is essential to preserve the value of Canadian intellectual property.

The CDCE therefore calls on the government to make four clear and foundational commitments. These commitments are based on the principles of Authorization, Remuneration, and Transparency (ART), which are essential to the development of voluntary licensing markets, whether individual or collective.

REQUEST

1

Make a firm, explicit, and public commitment to maintaining a Copyright Act based on the prior and unequivocal authorization of rights holders, and not to amend it to introduce an exception permitting text and data mining (TDM).

REQUEST

2

Adopt legislative measures requiring developers of generative AI systems to disclose the training data they use.

REQUEST

3

Adopt legislative measures to ensure that AI-generated content is clearly identified for the public.

REQUEST

4

Condition public support for the development of Canadian AI companies on compliance with copyright law and on the authorized and remunerated use of protected works and other copyright-protected subject matter.

A request for Canada to maintain its international leadership in culture

The CDCE fully endorses the pillar of the Strategy that calls for “strengthening multinational partnerships with trusted allies to help shape an international AI community and global standards grounded in mutual respect and cooperation.”

In this regard, the Parties to UNESCO’s 2005 Convention are among Canada’s trusted allies. Work is currently underway to strengthen the Convention’s normative framework for the digital environment. Canada has played a leading role in this effort since discussions began, and it is essential that this leadership continue in order to foster global AI governance that is consistent with the principles and obligations enshrined in the Convention.

REQUEST

5

Actively advocate for the adoption of an Additional Protocol to the 2005 Convention on the digital environment, as recommended by the Reflection Group on the Diversity of Cultural Expressions in the Digital Environment.

Canadian Policy Framework: Several Steps in the Right Direction

Canada's *AI for All* strategy forms part of a broader set of government initiatives that have highlighted the cultural issues arising from the development of AI and that should be more fully reflected in the Strategy.

Canadian Digital Regulators Forum. (2026). *Canadian Regulatory Perspectives on Principles Informing the Development and Use of AI*.

In an article on the responsible development and use of AI, to which the **Competition Bureau, the Office of the Privacy Commissioner of Canada, the Copyright Board of Canada, and the Canadian Radio-television and Telecommunications Commission** contributed, six principles were set out in light of the respective mandates of these organizations. The first principle identified is transparency. In this regard, the Copyright Board notes that:

From a copyright law and policy perspective, both the inputs and outputs of gen AI systems, particularly those based on large language models (LLMs), give rise to transparency issues. On the input side, AI systems are trained using text and data mining (TDM) techniques that involve the reproduction and analysis of large volumes of data, including potentially copyright-protected works, to identify patterns and generate outputs. **In this context, transparency regarding the data used to train AI systems is critical to enable rights holders to understand whether, and to what extent, their works have been used, and to exercise their rights accordingly.**

Standing Committee on Canadian Heritage. (2026). *Impacts of Artificial Intelligence on the Creative Industries*. House of Commons.

Mandated to study the impacts of technological advances in AI on the creative industries, **the Standing Committee on Canadian Heritage** made thirteen recommendations to the Government of Canada at the conclusion of its work. The first recommendation is particularly significant in the context of current discussions on AI and culture, as well as the concerns raised by the CDCE and its members: the Committee recommends **“that the Government of Canada protect the property rights and interests of artists through the**

principles of the *Copyright Act*, in accordance with the ART principle—authorization, remuneration and transparency.”

[National Summit on AI and Culture](#), Banff, March 15–17, 2026

At this Canadian gathering, which brought together leaders from the cultural, technological, and academic sectors as well as civil society, the **Minister of Canadian Identity and Culture and Minister responsible for Official Languages**, Mr. Marc Miller, stated that:

Our culture is at the heart of who we are as Canadians and is a powerful driver of innovation, inclusion and economic growth. Artificial intelligence is fundamentally transforming how we create, share and experience it, bringing tremendous opportunities but also pressures on our cultural sector. This Summit is exactly the right place to confront these questions **and ensure that Canada leads the global conversation on responsible AI development, and that innovation and cultural sovereignty advance together.**

During the Summit, the Minister also [publicly stated](#) that "the current copyright law does and should protect those that have created material, and people need to be compensated properly."

Taken together, these developments demonstrate a coordinated Canadian approach to governing AI while protecting culture, and they reinforce the recommendations put forward by the CDCE. The next step is to ensure that these principles are fully integrated into Canada's National AI Strategy.

Requests Aligned with International Developments

On October 27, 2025, the **Australian government** [ruled out the introduction of a text and data mining \(TDM\) exception into its copyright legislation](#). This decision sent a clear signal of support for the country's creators and other rights holders by reaffirming the importance of respecting copyright.

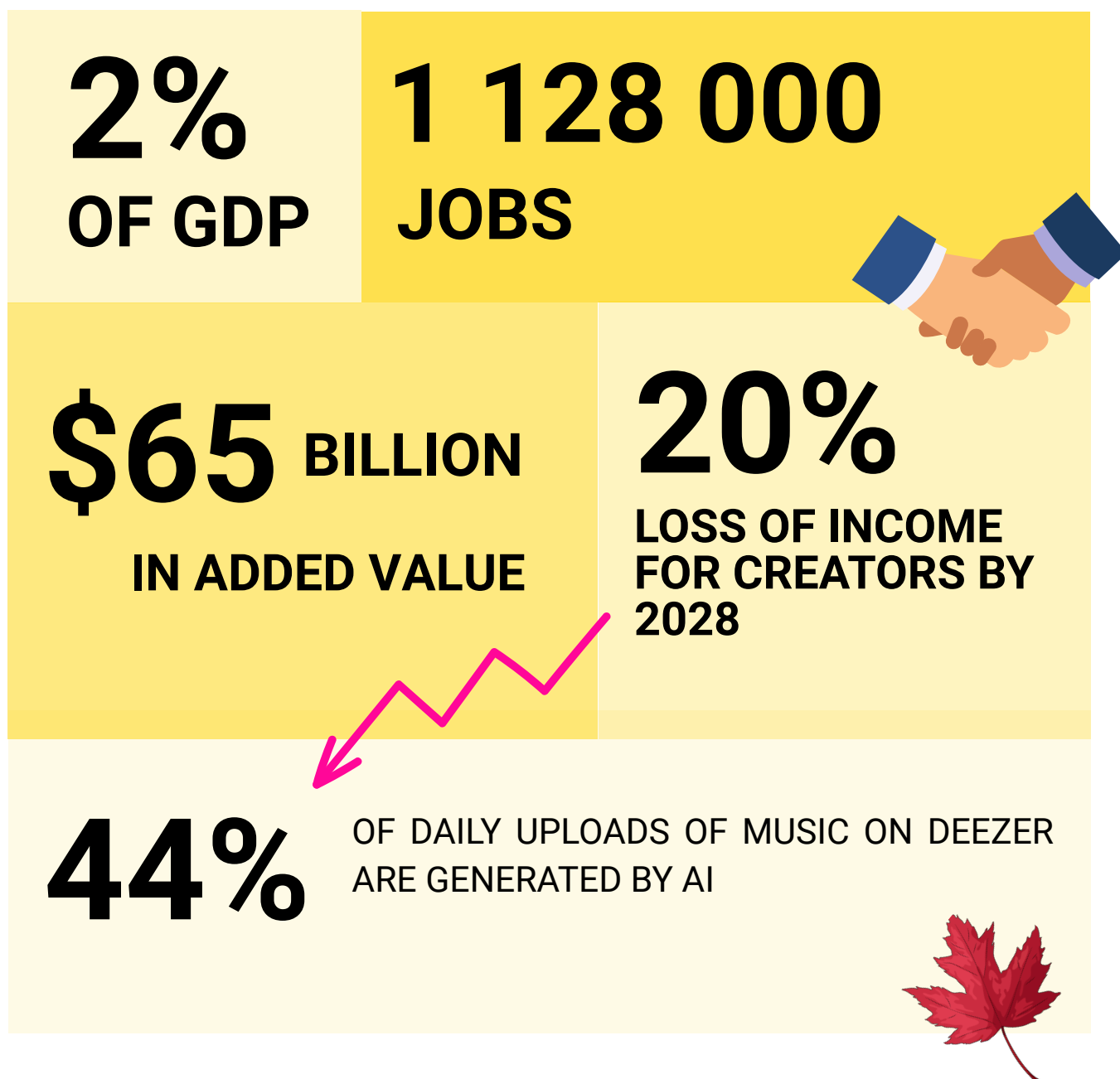
More recently, the United Kingdom has revised its position. After considering, since 2022, the introduction of a broad exception permitting text and data mining, the UK Government reassessed this approach following strong advocacy from the cultural sector and the results of its 2024–2025 public consultation on copyright and AI. In March 2026, [it announced that it was not favouring any regulatory option at this stage and decided to postpone any legislative reform](#) in order to continue assessing developments in licensing markets and international legal frameworks.

Among the international initiatives that merit close attention is the European regulatory framework. **The European Union's Artificial Intelligence Act**, which came into force in 2024, introduces a transparency obligation for providers of general-purpose AI models. Article 53 requires compliance with EU copyright and related rights legislation, as well as the publication of a “sufficiently detailed summary” of the content used to train AI systems, leaving significant room for interpretation regarding the required level of detail.

In March 2026, the European Parliament adopted by a large majority the report [Copyright and Generative Artificial Intelligence: Opportunities and Challenges](#), led by **MEP Axel Voss**. This resolution marks an important political step by reaffirming that AI development must not come at the expense of rights holders and that copyright remains a cornerstone of Europe's cultural ecosystem. The Parliament also calls for greater transparency regarding training data, fair remuneration for rights holders, and stronger mechanisms enabling them to control how their works are used by AI systems.

Far from being isolated, the recommendations put forward by the CDCE reflect policy directions that are gaining momentum in jurisdictions around the world, where copyright protection is increasingly recognized as an essential condition for the responsible development of artificial intelligence.

The Arts and Culture Sector: Key Figures



Sources : Business / Arts & Business Data Lab (BDL). (2025). Artworks: The Economic and Social Dividends from Canada's Arts and Culture Sector.

Deezer. (2026). Deezer : les morceaux générés par l'IA représentent désormais 44 % de l'ensemble des nouveaux titres mis en ligne.

PMP Strategy & CISAC. (2024). Étude sur l'impact économique de l'intelligence artificielle sur les industries musicale et audiovisuelle.