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Submission to the Standing Committee on Finance and Economic Affairs
Bill 105, Protecting Ontario's Workers and Economic Resilience Act, 2026
An Act to enact the Strengthening Talent Agency Regulation (STAR) Act, 2026 and to amend various Acts

Introduction

ACTRA Toronto represents over 15,000 professional performers working in film, television, commercials, animation, voice, and digital media. Our members are the face and voice of Ontario's screen-based entertainment industry, which generates billions in economic activity and supports tens of thousands of jobs.

We write to thank the government for tabling the proposed Strengthening Talent Agency Regulation Act, 2026. ACTRA Toronto commends the government for this initiative. We wholeheartedly agree that no worker in Ontario should be subject to wage theft, and we believe the provisions in the act will go a long way to limiting the precarity that far too often our performers and entertainment workers face. Further, we also acknowledge that additional supports and guardrails are also needed to assist our members in addressing the inherent precarity associated with their work in general, such as protections in the face of pervasiveness of Artificial Intelligence, improvements to Status of the Artist protections, and tax credits in the film and television sectors tied to the use of union labour.

Within our submission, we respectfully propose an important element that we believe will strengthen the STAR Act. We note, at Schedule 8 which currently reads:

8 (1) If a talent agency receives payment for work performed or services supplied by an entertainment worker whom it represents, the agency shall, (a) ensure the amount of the payment is deposited into a bank account used exclusively for funds owing to such entertainment workers…

Proposal

While we agree with the spirit of the legislation, we propose a clarification to the regulations and legislated requirements - to ensure the amount of the payment is deposited into a bank account used exclusively for funds owing to such entertainment workers, be strengthened to state that the exclusive bank account, be a trust account.

Trust Accounts

Requiring client funds to be deposited in a regulated trust account is a critical safeguard.

This would:

- Ensure client funds are protected in the event of agency insolvency or bankruptcy.
- Create a transparent, auditable trail for all transactions.
- Align Ontario with the best practices in B.C., New York, and California.

As such, we recommend:

- All agency-held performer funds must be in a separate, interest-bearing trust account.
- Annual independent audits, with reports submitted to the regulator.
- Penalties for commingling client funds with operating accounts.

Limits on Agency Fees

Currently, performers face an arbitrary and inconsistent landscape where agency commissions fluctuate between 15% and 25% without clear logic or justification.

As proposed in our initial submission, we support aligning with British Columbia's 15% maximum commission on gross earnings for work the agent procures so that Ontario can provide the predictable financial environment that is necessary to protect the livelihoods of performers and ensure consistency and stability within the industry.

As always, we remain willing to discuss this matter further if required, and we thank the committee for considering this request to ensure that the spirit of the legislation provides as much security as possible for performers and entertainment workers.

Respectfully submitted,

ACTRA Toronto