

Public consultation on the role of publishers in the copyright value chain and on the 'panorama exception'

Fields marked with * are mandatory.

General information about you

The views expressed in this public consultation document may not be interpreted as stating an official position of the European Commission. All definitions provided in this document are strictly for the purposes of this public consultation and are without prejudice to differing definitions the Commission may use under current or future EU law, including any revision of the definitions by the Commission concerning the same subject matters.

Fields marked with * are mandatory.

*

I'm responding as:

- An individual in my personal capacity
- A representative of an organisation/company/institution

*Please provide your first name:

Caroline

*Please provide your last name:

De Cock

*

Please indicate your preference for the publication of your response on the Commission's website:

- Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Please keep my contribution confidential. (it will not be published, but will be used internally within the Commission)

(Please note that regardless the option chosen, your contribution may be subject to a request for access to documents under [Regulation 1049/2001 on public access to European Parliament, Council and Commission documents](#). In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable [data protection rules](#).)

*Please enter the name of your institution/organisation/business.

Copyright for Creativity (C4C)

What is your institution/organisation/business website, etc.?

<http://copyright4creativity.eu/>

*What is the primary place of establishment of the entity you represent?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Italy
- Ireland
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

*

My institution/organisation/business operates in: *(Multiple selections possible)*

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Italy
- Ireland
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

*

If other, please specify

Created in 2010, Copyright 4 Creativity (C4C) is a broad-based coalition that seeks an informed debate on how copyright can more effectively promote innovation, access, and creativity. C4C represents libraries, scientific and research institutions, consumers, digital rights groups, technology businesses, and educational and cultural heritage institutions that share a common view on copyright embodied by C4C's Declaration. Check our full list of signatories:<http://copyright4creativity.eu/about-us>

*

Is your organisation registered in the [Transparency Register](#) of the European Commission and the European Parliament?

- Yes
 No

*

Please indicate your organisation's registration number in the Transparency Register.

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The role of publishers in the copyright value chain

In its Communication Towards a modern, more European copyright framework of 9 December 2015, the Commission has set the objective of achieving a well-functioning market place for copyright, which implies, in particular, "the possibility for right holders to license and be paid for the use of their content, including content distributed online." [1]

Further to the Communication and the related stakeholders' reactions, the Commission wants to gather views as to whether publishers of newspapers, magazines, books and scientific journals are facing problems in the digital environment as a result of the current copyright legal framework with regard notably to their ability to licence and be paid for online uses of their content. This subject was not specifically covered by other public consultations on copyright issues the Commission has carried out over the last years. In particular the Commission wants to consult all stakeholders as regards the impact that a possible change in EU law to grant publishers a new neighbouring right would have on them, on the whole publishing value chain, on consumers/citizens and creative industries. The Commission invites all stakeholders to back up their replies, whenever possible, with market data and other economic evidence. It also wants to gather views as to whether the need (or not) for intervention is different in the press publishing sector as compared to the book/scientific publishing sectors. In doing so, the Commission will ensure the coherence of any possible intervention with other EU policies and in particular its policy on open access to scientific publications. [3]

*

Selection

Do you wish to respond to the questionnaire "The role of publishers in the copyright value chain"?

- Yes *(Please allow for a few moments while questions are loaded below)*
- No

[1] [COM\(2015\)626 final](#).

[2] Neighbouring rights are rights similar to copyright but do not reward an authors' original creation (a work). They reward either the performance of a work (e.g. by a musician, a singer, an actor) or an organisational or financial effort (for example by a producer) which may also include a participation in the creative process. EU law only grants neighbouring rights to performers, film producers, record producers and broadcasting organisations. Rights enjoyed by neighbouring rightholders under EU law generally include (except in specific cases) the rights of reproduction, distribution, and communication to the public/making available.

[3] See Communication [COM\(2012\) 401](#), Towards better access to scientific information: Boosting the benefits of public investments in research, and Recommendation [C\(2012\) 4890](#) on access to and preservation of scientific information.

Category of respondents

*Please choose the category that applies to your organisation and sector.

- Member State
- Public authority
- Library/Cultural heritage institution (or representative thereof)
- Educational or research institution (or representative thereof)
- End user/consumer/citizen (or representative thereof)
- Researcher (or representative thereof)
- Professional photographer (or representative thereof)
- Writer (or representative thereof)
- Journalist (or representative thereof)
- Other author (or representative thereof)
- Collective management organisation (or representative thereof)
- Press publisher (or representative thereof)
- Book publisher (or representative thereof)
- Scientific publisher (or representative thereof)
- Film/audiovisual producer (or representative thereof)
- Broadcaster (or representative thereof)
- Phonogram producer (or representative thereof)
- Performer (or representative thereof)
- Advertising service provider (or representative thereof)
- Content aggregator (e.g. news aggregators, images banks or representative thereof)
- Search engine (or representative thereof)
- Social network (or representative thereof)
- Hosting service provider (or representative thereof)
- Other service provider (or representative thereof)
- Other

If other, please specify

Created in 2010, Copyright 4 Creativity (C4C) is a broad-based coalition that seeks an informed debate on how copyright can more effectively promote innovation, access, and creativity. C4C represents libraries, scientific and research institutions, consumers, digital rights groups, technology businesses, and educational and cultural heritage institutions that share a common view on copyright embodied by C4C's Declaration. Check our full list of signatories: <http://copyright4creativity.eu/about-us>

Questions

1. On which grounds do you obtain rights for the purposes of publishing your press or other print content and licensing it? (*Multiple selections possible*)

- transfer of rights from authors
- licensing of rights from authors (exclusive or non-exclusive)
- self-standing right under national law (e.g. author of a collective work)
- rights over works created by an employee in the course of employment
- not relevant
- other

Please explain

C4C is a coalition. While we do publish our own content (blog, videos, etc), this question is not relevant to us.

2. Have you faced problems when licensing online uses of your press or other print content due to the fact that you were licensing or seeking to do so on the basis of rights transferred or licensed to you by authors?

- yes, often
- yes, occasionally
- hardly ever
- never
- no opinion
- not relevant

If so, please explain what problems and provide examples indicating in particular the Member State, the uses you were licensing, the type of work and licensee.

C4C is a coalition. While we do publish our own content (blog, videos, etc), this question is not relevant to us.

3. Have you faced problems enforcing rights related to press or other print content online due to the fact that you were taking action or seeking to do so on the basis of rights transferred or licenced to you by authors?

- yes, often
- yes, occasionally
- hardly ever
- never
- no opinion
- not relevant

If so, please explain what problems and provide examples indicating in particular the Member State, the type of use and the alleged infringement to your rights.

C4C is a coalition so this question is not directly relevant to us.

4. What would be the impact on publishers of the creation of a new neighbouring right in EU law (in particular on their ability to license and protect their content from infringements and to receive compensation for uses made under an exception)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

We have seen a strong negative impact on publishers in Belgium, Germany and Spain from ancillary copyright. The damage is worst in Spain, due to the lack of flexibility in the law. Some news publishers have voiced their concerns against ancillary copyright, showing the damage is not theoretical - see statement by Les Echos & Melty (FR), AEEPP & Prisa (ES), ANSO (IT), Golem & Die Zeit (DE)

(http://www.aepp.com/pdf/151204_Statement_on_Digital_Single_Market_FINAL.pdf)

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This negative impact arises at various levels:

* All publishers face a decrease in traffic as a result of such a right. The ability of websites (such as aggregators) and individuals to freely link and share content benefits (press) publishers. It drives traffic to them and allows them to engage with an often younger digital audience across the world.

* Small(er) publishers and/or publishers that are mainly online are disproportionately impacted in a negative manner, as traffic to their site declines even more than to big publishers' sites, as they are often more dependent on aggregators for their site to be found. A Nera study on the impact of the introduction of ancillary rights for publishers in Spain (<http://www.aepp.com/pdf/InformeNera.pdf>) found that these rights will cause the publishing industry to lose 10 million a year - a loss suffered mostly by smaller and online publishers.

* The control on being referenced moves from publishers to collecting societies: now, publishers are in control - they can choose to appear online; with or without a paywall; how to be indexed in news aggregators. So this

gives them nothing - instead it takes control away from them, and puts it in the hand of collecting societies.

* Where the right has been introduced, no increase of revenue for publishers has occurred nor is expected: instead, it can result in decreased visibility and findability of publishers' content, which leads to a decrease in revenues, as shown in the Nera study. And publishers will not get significant amounts of new "reprography" income (from the photocopying of press articles) from this new right. In some countries - Spain, Ireland, the UK, news publishers did not get any of this income prior to the court rulings ordering that all of its goes to authors. And online publishers simply get zero share of this income.

* This new right negatively impacts the forms of publishing available to publishers and creators: there are examples where neighbouring rights affect the ability to publish under open licenses. In many Member States the implementation of the neighbouring right for performers as a remuneration right undermines their ability to share works under Creative Commons licenses, and the Spanish ancillary copyright has limited the freedom of Spanish press publishers to allow free uses of their works.

The following examples apply to several questions in this consultation:

* What is a publisher? Anyone putting something online could be considered a 'publisher' and hence claim the protection of this right, either by filing take down requests or claiming copyright infringement. And it would be impossible for the person receiving this 'notice' to check if the request is legitimate or not! This makes such a right open to abuses and creates an unacceptable climate of legal uncertainty.

* Why is the new right consulted on much broader than any ancillary copyright so far considered? A full neighbouring right beyond snippets & news (print, books, scientific publications, etc.) and for all forms of distribution (online e.g. via Kindle, Facebook or Flipboard, but also offline) is hinted at. C4C does not believe such a right is technically feasible, as it would have the effect of re-copyrighting the entire Internet. Billions of pages of written content published online would give rise to this new copyright, and any negative consequences and legal uncertainty would reach an unprecedented scale. The whole Internet is at risk and this can clearly not pass any cost-benefit analysis. A right covering all sectors would be much worse than a right covering only press publishers.

* How can 'news' publishers be differentiated from others? Limiting the right to news publishers has not worked in Spain or Germany, where the 'news publishers' right applies to content with information and entertainment value. But which content does not have that value? This is a subjective assessment, like differentiating the rights in films according to whether they are news, documentaries, or fiction!

* Does this new right imply longer protection terms? It is a threat to the public domain as a text that normally no longer is under copyright would suddenly fall under this new copyright when published again and in case you

refer to this newly published version. But how can anyone online know when referring to a text what the 'publisher's right' over this text could be?

5. Would the creation of a new neighbouring right covering publishers in all sectors have an impact on authors in the publishing sector such as journalists, writers, photographers, researchers (in particular on authors' contractual relationship with publishers, remuneration and the compensation they may be receiving for uses made under an exception)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

The 1st part of the question hints at a right granted to 'publishers in all sectors': the adoption of a new right covering publishers in all sectors would have significant negative consequences for authors in the publishing sector. As we have outlined above, such a right will likely have strong negative impact on the publishing sector which will negatively affect the entire ecosystem—including authors. Moreover, a right covering all sectors would be much worse than a right covering only press publishers.

As regards the second part of the question relating to the impact on authors, the term 'authors' covers many different people, and the answer to this question should hence be nuanced depending on the type of 'author' considered:

* If you are a researcher and publish an article in a scientific review, the publisher gets a separate copyright in your work. He can stop you from publishing elsewhere (book, open publication) with this new right. For as long as his copyright lasts (from 50 to 70 years judging by existing rights).

* If you are a researcher using data-mining techniques (<http://www.nature.com/news/trouble-at-the-text-mine-1.10184>) or a journalist doing data-driven journalism, you need to make sure this new publisher right is not infringed by your activities: a new right to fear.

* If you work in a university, library, research institution, your institution may have to pay more to access publisher databases - as contracts have to be renegotiated due to those new rights.

* If you are a journalist and want to publish an article on your blog, or in a collection of articles; if you write books and want to do a second edition, or adapt your book to make film: the publisher has a new right and can stop you.

* If you publish online under Creative Commons: 1st, under the Spanish law, a collecting society will charge internet services who link your work, whether you like it or not; 2nd, depending on who is considered the publisher, this person gets a new right that contradicts your Creative Commons licence.

In general, this new right will thus mean an increase of bargaining power of the publishers over the creators, similar to what happened in the music industry. Musicians and performers have rights on their performances, but the record labels also have their own right, which has made labels into powerful players. Recognising this, the EU rebalanced the relationship with measures protecting artists against labels

(http://europa.eu/rapid/press-release_MEMO-11-595_en.htm)- a “use it or lose it” clause for artists

(https://musicbusinessresearch.files.wordpress.com/2012/04/ijmbr_april_2012_martin_kretschmer_final.pdf), and an obligation for labels to pay 20% of their revenues to artists in a fund. C4C notes that this consultation does not address these type of safeguards, and only looks at the merits of the rights.

The following examples apply to several questions in this consultation:

* What is a publisher? Anyone putting something online could be considered a ‘publisher’ and hence claim the protection of this right, either by filing take down requests or claiming copyright infringement. And it would be impossible for the person receiving this ‘notice’ to check if the request is legitimate or not! This makes such a right open to abuses and creates an unacceptable climate of legal uncertainty.

* Why is the new right consulted on much broader than any ancillary copyright so far considered? A full neighbouring right beyond snippets & news (print, books, scientific publications, etc.) and for all forms of distribution (online e.g. via Kindle, Facebook or Flipboard, but also offline) appears to be suggested. C4C does not believe such a right would be technically feasible, as it would have the unfortunate effect of re-copyrighting the entire Internet. Billions of pages of written content published online would give rise to this new copyright, and any negative consequences and legal uncertainty would reach an unprecedented scale. This puts the whole Internet at risk and can clearly not pass any cost-benefit analysis.

* How can ‘news’ publishers be differentiated from others? Limiting the right to news publishers has not worked in Spain or Germany, where the ‘news publishers’ right applies to content with information and entertainment value. But which content does not have that value? This is a subjective assessment, like differentiating the rights in films according to whether they are news, documentaries, or fiction!

* Does this new right imply longer protection terms? It is a threat to the public domain as a text that normally no longer is under copyright would suddenly fall under this new copyright when published again and in case you refer to this newly published version. But how can anyone online know when referring to a text what the ‘publisher’s right’ over this text could be?

6. Would the creation of a neighbouring right limited to the press publishers have an impact on authors in the publishing sector (as above)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

The adoption of a new neighbouring right limited to press publishers would have significant negative consequences for authors in the publishing sectors:

* As regards their daily work: Many authors, and specifically journalists, rely on a wide ranging set of tools and practices to gather information to do their reporting, including news aggregators, services like Google Alerts, and social media. Journalists would encounter additional hurdles in finding and using news and information they need to do their jobs. Authors would find that these existing news products and services will likely be disrupted, their prices increased, or even discontinued altogether.

* As regards their rights in their writings: a journalist that would want to publish one of his articles on his blog, or in a collection of articles; or that write books and wants to do a second edition, or adapt his book to make film; in all these case the publisher has a new right and can stop the author from doing so.

* As regards the forms of publishing available to such authors: there are indeed a number of examples where neighbouring rights negatively affect the ability to publish works under open licenses. In many EU member states the implementation of the neighbouring right for performers as a remuneration right undermines their ability to share works under Creative Commons licenses, and the Spanish ancillary copyright for press publishers has also limited the freedom of Spanish press publishers to allow free uses of their works. Indeed, the Spanish ancillary right does not treat openly-licensed content differently from content under all rights reserved copyright. Content publishers sharing under Creative Commons licenses, which is increasingly popular, would still be subject to the ancillary copyright. If the right is unwaivable, aggregators would be required to pay fair remuneration to a collective rights management organisation even if a creator has chosen to apply a Creative Commons license that allows the free reuse of her creation.

C4C would finally like to highlight a few general remarks, which apply to several questions in this consultation and which we will repeat for each one:

* What is a publisher? Anyone putting something online could be considered a 'publisher' and hence claim the protection of this new right. This would enable them to file take down requests or claim copyright infringement. And it would be impossible for the person receiving this 'notice' to check if their request is legitimate or not! This makes such a right open to abuses and creates a climate of legal uncertainty which is unacceptable.

* Why is the new right consulted on much broader than any ancillary copyright so far considered? The scope and implications of the new right hinted at in this consultation goes beyond anything seen so far in Germany and Spain: it suggests it could apply to all types of content, not just news articles (print, books, scientific publications, etc.) and to all forms of distribution (online like via Kindle, Facebook or Flipboard, but also in the physical world). Billions of webpages will be 'copyrighted' by this new right! This puts the whole Internet at risk and can clearly not pass any cost-benefit analysis. More generally, a right covering all sectors would be much worse than a right covering only press publishers.

* How can 'news' publishers be differentiated from others? It's not possible to limit the right to news publishers only. Experience shows this has not worked in Spain or Germany: there, the so-called 'news publishers' right applies to content that has information and entertainment value. The problem is: which content does not have that value? This is a purely subjective assessment. It was like trying to differentiate the rights in films according to whether they are news, documentaries, or fiction!

* Does this new right not imply even longer protection terms? The new right considered is a threat to the public domain as a text that normally would no longer be under copyright (for example a novel by Kafka) would suddenly fall under this new copyright when published again and in case you refer to this newly published version. But how can anyone on the Internet know when referring to a text what the 'publisher's right' over this text could be?

7. Would the creation of a new neighbouring right covering publishers in all sectors have an impact on right holders other than authors in the publishing sector?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

Creating a new right will make rights clearance more burdensome for anyone interested in re-using existing content, and complicate an already overly complex copyright system.

Any creator, blogger, vlogger, app developer, Internet user, etc who seeks to create a new work on the basis of another work will need to get permission not only from the author of the original work, but also from the publisher. For those individuals, the creation of an additional layer of rights means an additional clearance of rights and higher transaction costs (or just not creating to avoid the trouble).

Given this, a right covering all sectors would be much worse than a right covering only press publishers.

C4C would finally like to highlight a few general remarks, which apply to several questions in this consultation and which we will repeat for each one:

* What is a publisher? Anyone putting something online could be considered a 'publisher' and hence claim the protection of this new right. This would enable them to file take down requests or claim copyright infringement. And it would be impossible for the person receiving this 'notice' to check if their request is legitimate or not! This makes such a right open to abuses and creates a climate of legal uncertainty which is unacceptable.

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8. Would the creation of a neighbouring right limited to the press publishers have an impact on rightholders other than authors in the publishing sector?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

Creating a new right will make rights clearance more burdensome for anyone interested in re-using existing content, and complicate an already overly complex copyright system.

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* Does this new right not imply even longer protection terms? The new right considered is a threat to the public domain as a text that normally would no longer be under copyright (for example a novel by Kafka) would suddenly fall under this new copyright when published again and in case you refer to this newly published version. But how can anyone on the Internet know when referring to a text what the 'publisher's right' over this text could be?

9. Would the creation of a new neighbouring right covering publishers in all sectors have an impact on researchers and educational or research institutions?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

Linking to sources in blogs and tweets, quoting snippets of the material used to do research including when using new technologies such as text and data mining (TDM), including references in materials for Massive Open Online Courses (MOOCs) shared with students across the globe: all of this is natural in the research and education arena. Yet all of this could be threatened by this new right as the publisher could refuse that someone refers to it or make them pay for it, even if it means paying twice: the first time to access an article behind a paywall and the second time to refer to it.

Institutional players like libraries, research centres, universities will not only face additional costs at a time where their finances are often already under strain, but will also face the burden of having to negotiate yet another set of licensing terms with multiple stakeholders. And, the creation of this new right - including for scientific publishers as referred in the consultation - contradicts calls for a text-and-data-mining exception. New rights of publishers would allow them to oppose TDM activities vital to European research
(http://www.lisboncouncil.net/index.php?option=com_downloads&id=1034).

Looking at the situation of libraries, these public interest institutions provide not-for-profit information services of various kinds (including blogs and tweets) to their patrons who are researchers, students or the general public. These services are tailored to the needs of different groups of users for the purpose of assisting users' enquiry, research or study, and necessarily include hyperlinks to materials published online, including licensed materials to which the library users have legal access. Likewise, online study and course materials offered through public libraries and educational and research institution libraries will include brief descriptions or extracts or full texts with hyperlinks for the purposes of research or study. Such materials may be offered not just within institutional closed access virtual learning environment (VLE) platforms but may be offered as support materials for Massive Open Online Courses (MOOCs).

Full-text online material may be public domain, offered under Creative Commons Licences or other free licensing, or may be paywalled and access is only available via paid for licensing. It would be unfair if licensees would have

to pay twice to exploit the materials for which they are already paying to access (or pay at all where materials are offered free of charge), because they quote and provide hyperlinks to that material in the information services they provide to their patrons who already have legal access to the materials as authorised users under the licence. These services are of critical importance to users, helping to point them towards relevant materials and would be of little help to them without containing hyperlinks (the bedrock of the Web) together with a short description and title indicating what the material linked to is about.

Moreover, faced with new licensing costs, many not-for-profit information services would cease, resulting in greater restrictions on access to information with substantial negative impact on libraries and other not-for-profits and on the public's and researchers' knowledge on what information exists in their field of enquiry and where to find it. Additionally any public interest public domain access to knowledge project from the library and archive sector, such as the Internet Archive and the Gutenberg project, would be compromised in Europe.

Looking at the situation of education professionals and researchers, educational repositories, blogs run by teachers, online encyclopedias, and dictionaries all collect and share links to third party resources, and some even contain small snippets of text written by those providers. With a new neighboring right for press publishers, educators and researchers would be further limited in how they may use content for teaching and learning. It could also increase costs to institutions for licensing fees, and even exacerbate the increasing disparity in the quality of education provided across member states. In other words, such a new right will lead to less use of educational material, as teachers and educational institutions are afraid to break the law. This would generate a strong negative impact, as demonstrated in a recent study of the impact of EU copyright laws on the development of educational resources (Teresa Nobre, 2014 - http://oerpolicy.eu/wp-content/uploads/2014/07/working_paper_140714.pdf), which shows the various impacts stemming from not using resources, not sharing across countries, or the creation of burdensome clearance processes.

10. Would the creation of a neighbouring right limited to press publishers have an impact on researchers and educational or research institutions?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

Linking to sources in blogs and tweets, quoting snippets of the material used to do research including when using new technologies such as text and data mining (TDM), including references in materials for Massive Open Online Courses (MOOCs) shared with students across the globe: all of this is natural in the research and education arena. Yet all of this could be threatened by this new right as the publisher could refuse that someone refers to it or make them pay for it, even if it means paying twice: the first time to access an article behind a paywall and the second time to refer to it.

Institutional players like libraries, research centres, universities will not only face additional costs at a time where their finances are often already under strain, but will also face the burden of having to negotiate yet another set of licensing terms with multiple stakeholders. And, the creation of this new right - including for scientific publishers as referred in the consultation - contradicts calls for a text-and-data-mining exception. New rights of publishers would allow them to oppose TDM activities vital to European research

(http://www.lisboncouncil.net/index.php?option=com_downloads&id=1034).

Looking at the situation of libraries, these public interest institutions provide not-for-profit information services of various kinds (including blogs and tweets) to their patrons who are researchers, students or the general public. These services are tailored to the needs of different groups of users for the purpose of assisting users' enquiry, research or study, and necessarily include hyperlinks to materials published online, including licensed materials to which the library users have legal access. Likewise, online study and course materials offered through public libraries and educational and research institution libraries will include brief descriptions or extracts or full texts with hyperlinks for the purposes of research or study. Such materials may be offered not just within institutional closed access virtual learning environment (VLE) platforms but may be offered as support materials for Massive Open Online Courses (MOOCs).

Full-text online material may be public domain, offered under Creative Commons Licences or other free licensing, or may be paywalled and access is only available via paid for licensing. It would be unfair if licensees would have to pay twice to exploit the materials for which they are already paying to access (or pay at all where materials are offered free of charge), because they quote and provide hyperlinks to that material in the information services they provide to their patrons who already have legal access to the materials as authorised users under the licence. These services are of critical importance to users, helping to point them towards relevant materials and would be of little help to them without containing hyperlinks (the bedrock of the Web) together with a short description and title indicating what the material linked to is about.

Moreover, faced with new licensing costs, many not-for-profit information services would cease, resulting in greater restrictions on access to

information with substantial negative impact on libraries and other not-for-profits and on the public's and researchers' knowledge on what information exists in their field of enquiry and where to find it. Additionally any public interest public domain access to knowledge project from the library and archive sector, such as the Internet Archive and the Gutenberg project, would be compromised in Europe.

Looking at the situation of education professionals and researchers, educational repositories, blogs run by teachers, online encyclopedias, and dictionaries all collect and share links to third party resources, and some even contain small snippets of text written by those providers. With a new neighboring right for press publishers, educators and researchers would be further limited in how they may use content for teaching and learning. It could also increase costs to institutions for licensing fees, and even exacerbate the increasing disparity in the quality of education provided across member states. In other words, such a new right will lead to less use of educational material, as teachers and educational institutions are afraid to break the law. This would hence create a strong negative impacts, as demonstrated in a recent study of the impact of EU copyright laws on the development of educational resources (Teresa Nobre, 2014 - http://oerpolicy.eu/wp-content/uploads/2014/07/working_paper_140714.pdf), which shows the various impacts stemming from not using resources, not sharing across countries, or the creation of burdensome clearance processes.

11. Would the creation of new neighbouring right covering publishers in all sectors have an impact on online service providers (in particular on their ability to use or to obtain a licence to use press or other print content)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

Today, free content is easily found and shared on the Internet. The relationship between publishers and online services (content aggregators, social media, search engines, apps, etc.) is symbiotic. New rights covering publishers would negatively impact content access and sharing by users and the creation of innovative business models necessary to the development of the publishing industry.

This impact would be especially hard for start-ups and small companies, struggling with an added layer of licensing complexity. Indeed, creating a new right means that licensing and rights clearance will be more complex and burdensome, something which weighs even more on smaller companies.

Start-ups have for example already shut down entirely or have shut down products and invested elsewhere for fear of legal dispute with collecting societies; others have seen their funding dry up as investors walked away from the legal risk.

Javier Sardá, Founder of NewsletterBreeze, says “we lost 3/4 ths of the customers we had gained during the preceding few months. None of the customers who were testing the service became customers. They were afraid of being charged a tax of an unknown quantity. From one day to the next, our promising future, turned really dark”

(<http://newsletterbreeze.com/european-copyright-reform-legislation>). Ricardo Galli, co-founder of Spanish start-up Meneame, says, “The law [in Spain] codifies an extractive cartel, penalises innovation, the roll out of new digital products, harms the smaller media that depend mainly on social networks for their dissemination and their growth, and puts companies like Meneame in a situation of economic uncertainty”

(<http://www.libertaddigital.com/opinion/ricardo-galli/canon-aede-o-que-emprend-an-los-otros-73010/>).

Moreover, depending on how such a new right would be implemented, it could also have far reaching consequences for online service providers that build on openly licensed content: implementation as a remuneration right or via compulsory collective management would namely undermine or destroy business models that build on open content.

In addition, such a new right would also negatively affect cultural heritage institutions and aggregation platforms such as Europeana.eu, who are already suffering from the complexity of rights and the costs of rights clearance.

These risks are not merely theoretical: current proposals, adopted or not, are making these threats very real indeed.

The French legislator is, for example, considering a new right that would require search engines and indexing services to pay royalties for the use of thumbnail images of copyright-protected works
(http://www.senat.fr/amendements/commissions/2015-2016/15/Amdt_COM-182.html).

According to the proposal (which is currently being deliberated in the French Senate), this new right would be managed by one or more collecting societies, regardless of the intention of the rightholders whether to be financially compensated for the use of their works by search engines.

If implemented, the new right would apply to all kinds of online intermediaries, including public services like Europeana.eu. It would likely force search engines of all types to discontinue the use of thumbnail previews.

Copyright should not cover de minimis uses of copyrighted works—such as the appearance of thumbnails or snippets in search results. Just because it’s technically possible to negotiate a license for every piece of digital content

does not mean that everything should be licensed.

12. Would the creation of such a neighbouring right limited to press publishers have an impact on online service providers (in particular on their ability to use or to obtain a licence to use press content)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

Limiting the right to only press publishers does not solve the fundamental problems such a right would create.

Onlineservice providers are threatened by this new right at various levels: the content they provide could be subject to this new right, meaning they would need to pay licensing fees or face refusals for that content to be made available to their users. But also, they could be threatened for content put by their users, for example if users can themselves upload content or post comments, or public messages, etc through their platform.

This is not a theoretical threat: the introduction of this new right in Spain and Germany has already lead to damages to companies and the market because of the liability and cost it implies. In Germany, a legal battle that will take years to settle is underway. In Spain, media pluralism was undermined with small online publishers and news aggregators shutting down.

More fundamentally, by creating this new right, it's the whole of the Internet that is under threat, as every link could generate a discussion about the application of this new right, hence creating a chilling effect for everyone.

We refer you to our response to Question 11 for additional details.

13. Would the creation of new neighbouring right covering publishers in all sectors have an impact on consumers/end-users/EU citizens?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

The creation of this new right would affect consumers/end-users/EU citizens at various levels:

* **Less access to content and knowledge:** today, content is easily found and shared on the Internet. if this new right is introduced, pointing users to content will no longer happen as it does today as it will come at a cost to anyone doing it. At the same time, small innovative publishers become less easy to find. Many users that rely on curated news aggregators like Google News or even RSS readers or other apps that reproduce snippets of content from news articles. If an additional right for press publishers is enacted, users would find that these existing news products and services will likely be disrupted, their prices increased, or even discontinued altogether (as we've seen in Spain with Google News). Think also about sites like Facebook and Twitter that permit anyone to post links and short pieces of text. Under a system where publishers are granted an additional right to such snippets, those publishers would be able to extract fees from social networking sites (who of course would likely pass on that cost to their users) in order to allow for open linking to content.

* **Choice:** experience in Germany and Spain has shown that small companies close their doors faced with this new right, meaning less choice of providers for users due to market concentration, with only the big ones remaining standing.

* **Increased liability:** how comfortable will users be sharing content online in the future if anyone can claim being that content's publisher and sue them for sharing it?

14. Would the creation of new neighbouring right limited to press publishers have an impact on consumers/end-users/EU citizens?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

As outlined in the response to question 13, the adoption of a new neighboring right limited to publishers would have significant negative consequences for consumers/end-users/EU citizens. Limiting the right to only press publishers does not solve the fundamental problems such a right would create.

The creation of this new right would affect consumers/end-users/EU citizens at various levels:

* Less access to content and knowledge: today, content is easily found and shared on the Internet. if this new right is introduced, pointing users to content will no longer happen as it does today as it will come at a cost to anyone doing it. At the same time, small innovative publishers become less easy to find. Many users that rely on curated news aggregators like Google News or even RSS readers or other apps that reproduce snippets of content from news articles. If an additional right for press publishers is enacted, users would find that these existing news products and services will likely be disrupted, their prices increased, or even discontinued altogether (as we've seen in Spain with Google News). Think also about sites like Facebook and Twitter that permit anyone to post links and short pieces of text. Under a system where publishers are granted an additional right to such snippets, those publishers would be able to extract fees from social networking sites (who of course would likely pass on that cost to their users) in order to allow for open linking to content.

* Choice: experience in Germany and Spain has shown that small companies close their doors faced with this new right, meaning less choice of providers for users due to market concentration, with only the big ones remaining standing.

* Increased liability: how comfortable will users be sharing content online in the future if anyone can claim being that content's publisher and sue them for sharing it?

15. In those cases where publishers have been granted rights over or compensation for specific types of online uses of their content (often referred to as "ancillary rights") under Member States' law, has there been any impact on you/your activity, and if so, what?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain, indicating in particular the Member State.

“Ancillary rights” have been granted to press publishers in Germany and in Spain. Though not yet fully operational, these rights have already created huge legal uncertainties in both countries, leading to court cases, closures of businesses and withdrawals by players from these markets, to the detriment of media pluralism. These rights clearly undermine innovation, media diversity, consumer choice, competition, and benefit mainly lawyers. They harm journalists, publishers, consumers, internet users. They have been condemned by academics, competition authorities, journalists, publishers themselves and courts themselves

In Spain, a report found that the ancillary rights will cause the publishing industry to lose 10 million a year - a loss suffered predominantly by smaller and online publishers (see <http://www.nera.com/content/dam/nera/publications/2015/090715%20Informe%20de%20NERA%20para%20AEEPP%20%28VERSION%20FINAL%29.pdf>).

Overall, it has a disproportionately negative impact on smaller publishers (as traffic to their site declines even more than to big publishers’ sites) and is not supported by all news publishers, as evidenced by statements against ancillary copyright (see http://www.aepp.com/pdf/151204_Statement_on_Digital_Single_Market_FINAL.pdf) from organisations like Les Echos (France), AEEPP (Spain), Prisa (Spain) (see http://www.elconfidencial.com/comunicacion/2015-07-07/cebrian-dinamita-la-aede-al-renunciar-en-solitario-a-cobrar-la-tasa-google_916201/), ANSO (Italy), Melty (France), Golem (Germany), or Die Zeit (Germany).

16. Is there any other issue that should be considered as regards the role of publishers in the copyright value chain and the need for and/or the impact of the possible creation of a neighbouring right for publishers in EU copyright law?

- Yes
- No

If so, please explain and whenever possible, please back up your replies with market data and other economic evidence.

Europe's chaotic approach to copyright exceptions and limitations added to the complexity of such an arrangement would create huge barriers to the digital single market in Europe.

This new right for publishers is a threat to innovation and competition in the Internet economy and the press. The ironic effect of such a new right for publishers is that the market dominance of the big players is reinforced to the disadvantage of new and smaller market players.

Moreover, this new right is a threat to the freedom of information. This new right has detrimental effects on the free flow of information on the Internet. When key search and aggregation technologies are restricted in their indexing of content and presentation of search results, finding the information will be made more difficult or even impossible.

C4C therefore urges the European Commission to clearly acknowledge that a new copyright for publishers is neither justified nor necessary and to encourage Spain and Germany to remove their ancillary copyrights from their national legislation, in the framework of its copyright review and in light of its proclaimed goal to achieve a digital single market. We refer you for more details in terms of evidence and data to our responses to the other questions.

We would just like to note that C4C's opposition to creating additional rights for publishers is shared by a majority at the European parliament which twice voted against recommending additional rights for publisher as during the deliberation on the evaluation report on the implementation of Directive 2001/29/EC on the harmonisation of certain aspects of copyright and related rights in the information society. In addition, 80 MEPs wrote a letter to the Commission opposing it (see: <http://www.communia-association.org/2015/12/18/83-meps-say-no-to-ancillary-copyright-in-europe/>).

Finally it is worth highlighting again that while there is a strong lobby from some big publishers for introducing such a right, not all publishers are in favor. In December 2015 a coalition of publishers wrote to the Commission in opposition to the introduction of a new right for publishers (see http://www.aepp.com/pdf/151204_Statement_on_Digital_Single_Market_FINAL.pdf). This illustrates that professional publishers recognize that taxing the links that bring readers to their sites is counterproductive to their businesses. In addition, bloggers, open access publishers, and other authors who seek the widest possible dissemination of their content would not be well-served by an publisher's right.

Use of works, such as works of architecture or sculpture, made to be located permanently in public places (the 'panorama exception')

EU copyright law provides that Member States may lay down exceptions or limitations to copyright concerning the use of works, such as works of architecture or sculpture, made to be located permanently in public places (the 'panorama exception') [1] . This exception has been implemented in most Member States within the margin of manoeuvre left to them by EU law.

In its Communication Towards a modern, more European copyright framework, the Commission has indicated that it is assessing options and will consider legislative proposals on EU copyright exceptions, among others in order to "clarify the current EU exception permitting the use of works that were made to be permanently located in the public space (the 'panorama exception'), to take into account new dissemination channels." [2]

This subject was not specifically covered by other public consultations on copyright issues the Commission has carried out over the last years. Further to the Communication and the related stakeholder reactions, the Commission wants to seek views as to whether the current legislative framework on the "panorama" exception gives rise to specific problems in the context of the Digital Single Market. The Commission invites all stakeholders to back up their replies, whenever possible, with market data and other economic evidence.

*

Selection

Do you wish to respond to this questionnaire "Use of works, such as works of architecture or sculpture, made to be located permanently in public places (the 'panorama exception')?"

- Yes *(Please allow for a few moments while questions are loaded below)*
- No

[1] Article 5(3)(h) of [Directive 2001/29/EC of the European Parliament and of the Council of 22 May 2001 on the harmonisation of certain aspects of copyright and related rights in the information society.](#)

[2] [COM\(2015\) 626 final.](#)

Category of respondents

*

Please choose the category that applies to your organisation and sector.

- Member State
- Public authority
- Owner or manager of works made to be located permanently in public places (or representative thereof)
- Library or Cultural heritage institution (or representative thereof)
- Educational or research institution (or representative thereof)
- End user/consumer/citizen (or representative thereof)
- Visual artist (e.g. painter, sculptor or representative thereof)
- Architect (or representative thereof)
- Professional photographer (or representative thereof)
- Other authors (or representative thereof)
- Collective management organisation (or representative thereof)
- Publisher (or representative thereof)
- Film/audiovisual producer (or representative thereof)
- Broadcaster (or representative thereof)
- Phonogram producer (or representative thereof)
- Performer (or representative thereof)
- Advertising service provider (or representative thereof)
- Content aggregator (e.g. news aggregators, images banks or representative thereof)
- Search engine (or representative thereof)
- Social network (or representative thereof)
- Hosting service provider (or representative thereof)
- Other service provider (or representative thereof)
- Other

If other, please specify

Created in 2010, Copyright 4 Creativity (C4C) is a broad-based coalition that seeks an informed debate on how copyright can more effectively promote innovation, access, and creativity. C4C represents libraries, scientific and research institutions, consumers, digital rights groups, technology businesses, and educational and cultural heritage institutions that share a common view on copyright embodied by C4C's Declaration. Check our full list of signatories: <http://copyright4creativity.eu/about-us>

Questions

1. When uploading your images of works, such as works of architecture or sculpture, made to be located permanently in public places on the internet, have you faced problems related to the fact that such works were protected by copyright?

- Yes, often
- Yes, occasionally
- Hardly ever
- Never
- No opinion
- Not relevant

If so, please explain what problems and provide examples indicating in particular the Member State and the type of work concerned.

C4C represents a broad range of stakeholders and our answer hence reflects their experience rather than our own personal one.

As a general remark, we would like to stress that, while some consider 'problems' only means cases where you are actively sued, such a narrow interpretation ignores the fact that it is problematic in itself when you do something that is illegal even if you are not sued for it. Leaving bad laws in place by claiming they are not enforced is not really a good approach.

Looking at the (lack of) panorama exception, we would like to point out the following incoherences:

* In France (https://commons.wikimedia.org/wiki/Category:French_FOP_cases), Belgium (https://commons.wikimedia.org/wiki/Category:Belgian_FOP_cases), Greece (https://commons.wikimedia.org/wiki/Category:Greek_FOP_cases), Italy (https://commons.wikimedia.org/wiki/Category:Italian_FOP_cases), Luxembourg (https://commons.wikimedia.org/wiki/Category:Luxembourgish_FOP_cases) all use cases (non-commercial and commercial) can be problematic.

* Also problematic for "commercial use" (which normally includes blogs and socials media as there is advertising present) are: Bulgaria, Romania, Slovenia, Estonia, Lithuania and Latvia.

* Denmark, Sweden (https://commons.wikimedia.org/wiki/Category:Swedish_FOP_cases) and Finland are problematic for images of sculptures.

More generally, whenever online sites use any relevant work, they face legal uncertainty as regards what right will be asserted, in what country and to what extent.

2. When providing online access to images of works, such as works of architecture or sculpture, made to be located permanently in public places, have you faced problems related to the fact that such works were protected by copyright?

- Yes, often
- Yes, occasionally
- Hardly ever
- Never
- No opinion
- Not relevant

If so, please explain what problems and provide examples indicating in particular the Member State and the type of work concerned

C4C represents a broad range of stakeholders and our answer hence reflects their experience rather than our own personal one.

As a general remark, we would like to stress that, while some consider 'problems' only means cases where you are actively sued, such a narrow interpretation ignores the fact that it is problematic in itself when you do something that is illegal even if you are not sued for it. Leaving bad laws in place by claiming they are not enforced is not really a good approach.

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* Also problematic for "commercial use" (which normally includes blogs and socials media as there is advertising present) are: Bulgaria, Romania, Slovenia, Estonia, Lithuania and Latvia.

* Denmark, Sweden (https://commons.wikimedia.org/wiki/Category:Swedish_FOP_cases) and Finland are problematic for images of sculptures.

More generally, whenever online sites use any relevant work, they face legal uncertainty as regards what right will be asserted, in what country and to what extent.

3. Have you been using images of works, such as works of architecture or sculpture, made to be located permanently in public places, in the context of your business/activity, such as publications, audiovisual works or advertising?

- Yes, on the basis of a licence
- Yes, on the basis of an exception
- Never
- Not relevant

If so, please explain, indicating in particular the Member State and what business/activity, and provide examples.

C4C represents a broad range of stakeholders and our answer hence reflects their experience rather than our own personal one.

Looking at the (lack of) panorama exception, we would like to point out the following incoherences:

* Bulgaria, Romania, Slovenia, Estonia, Lithuania and Latvia allow non-commercial uses only, which means that above mentioned activities are problematic.

* Italy (https://commons.wikimedia.org/wiki/Category:Italian_FOP_cases), Greece (https://commons.wikimedia.org/wiki/Category:Greek_FOP_cases), Luxembourg (https://commons.wikimedia.org/wiki/Category:Luxembourgish_FOP_cases), France (https://commons.wikimedia.org/wiki/Category:French_FOP_cases), Belgium don't have any exception.

* Countries where the exception covers all uses, including commercial, are: Ireland, UK, the Netherlands (https://commons.wikimedia.org/wiki/Category:Dutch_FOP_cases), Spain, Portugal (https://commons.wikimedia.org/wiki/Category:Portuguese_FOP_cases), Malta, Cyprus, Croatia, Hungary (https://commons.wikimedia.org/wiki/Category:Hungarian_FOP_cases), Czech Republic, Slovakia, Austria, Germany, Poland (https://commons.wikimedia.org/wiki/Category:Polish_FOP_cases) and Sweden (https://commons.wikimedia.org/wiki/Category:Swedish_FOP_cases) . You're less likely to have had a problem here.

* Denmark, Sweden and Finland allow photographs of buildings to be used freely.

More generally, whenever online sites use any relevant work, they face legal uncertainty as regards what right will be asserted, in what country and to what extent. And where clearance of rights succeeded, it has proven to be for most companies involved a time-consuming exercise.

4. Do you license/offer licences for the use of works, such as works of architecture or sculpture, made to be located permanently in public places?

- Yes
- No
- Not relevant

If so, please provide information about your licensing agreements (Member State, licensees, type of uses covered, revenues generated, etc.).

C4C does not itself licence or offer licences. We are however aware of illustrations of the difficulties created by licences, and the shortcomings stemming from relying on licensing as a miracle solution. For example, it seems the European Parliament has attempted to give Wikimedia permission to reuse the image of its Strasbourg principal building (Louise Weisse), but failed because the rights remain with the architect.

5. What would be the impact on you/your activity of introducing an exception at the EU level covering non-commercial uses of works, such as works of architecture or sculpture, made to be located permanently in public places?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

This question is slightly misleading to answer to.

Indeed, the question limits the introduction of an exception to copyright to 'non-commercial uses'. That may seem very attractive, except that the difference between a 'commercial' and a 'non-commercial' use is not at all obvious from a legal point of view. Moreover, the introduction of an exception limited to 'non-commercial' at EU level would limit already-existing rights of users granted by member state implementations, as Poland, Germany and several other EU member states have already implemented a broad exception for freedom of panorama without limiting use to non-commercial purposes only.

Just think about the most common, everyday online activities you do, using the Internet. Social media platforms and photo sharing websites are commercial operation, even you are using them privately without any transactions. Blogs that show ads to cover hosting costs are commercial. Non-for-profit projects, although not commercial, can be considered of "commercial scope", as evidenced by the recent Swedish Wikimedia case (<http://blog.wikimedia.org/2016/04/04/strike-against-freedom-panorama/>).

The Commission must thus be encouraged not to go for a so-called solution that does not create any legal certainty and does not deal with the problem at hand.

6. What would be the impact on you/your activity introducing an exception at the EU level covering both commercial and non-commercial uses of works, such as works of architecture or sculpture, made to be located permanently in public places?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

Considering how difficult it is to differentiate what is commercial and non-commercial on the Internet, and considering that when you upload/shar/use an image online it can be accessed from any EU country and thus have any national law apply to it, the introduction of an EU level exception covering both commercial and non-commercial uses is the only approach that will make a difference and provide for:

- * Improved legal certainty across borders in Europe
- * Freedom to create
- * Freedom of expression online

Looking at the specific case of a free knowledge projects like Wikipedia, such an EU-wide exception would allow Wikipedia to depict public spaces from all European countries

(https://commons.wikimedia.org/wiki/Commons:Freedom_of_panorama), thus improving access to knowledge and availability of European culture globally.

It would enable the largest photography contest

(https://en.wikipedia.org/wiki/Wiki_Loves_Monuments) in the world to be organised in all European countries. It would allow travel bloggers and travel guides (<https://www.wikivoyage.org/>) to safely share their European experiences with potential future travellers. It would allow for far more quality educational material

(https://commons.wikimedia.org/wiki/Category:Modern_movement_architecture_in_Germany_by_city) for young architects and sculptors.

7. Is there any other issue that should be considered as regards the 'panorama exception' and the copyright framework applicable to the use of works, such as works of architecture or sculpture, made to be permanently located in public places?

- Yes
- No

If so, please explain and whenever possible, please back up your replies with market data and other economic evidence.

The sharing of photos taken in public places is an example of an everyday activity that should not be regulated by copyright.

All types of work should be included in the drafting of a comprehensive EU-wide 'panorama' exception and the exception should be made mandatory so that there is no confusion for EU citizens, or for organisation and business activity in Member States other than their own, and it should cover both online and offline uses.

The exception should reply to both commercial and non-commercial activities, and this regardless of the point of view or location of the photographer/painter or the location of the work, as long as it is open to the public or in public spaces.

Submission of questionnaire

End of survey. Please submit your contribution below.

Useful links

[Webtext EN \(https://ec.europa.eu/digital-agenda/news-redirect/29674\)](https://ec.europa.eu/digital-agenda/news-redirect/29674)

Background Documents

[Privacy Statement DE \(/eusurvey/files/08c163a2-8983-4d3b-ae3e-21f69b5957cd\)](/eusurvey/files/08c163a2-8983-4d3b-ae3e-21f69b5957cd)

[Privacy Statement EN \(/eusurvey/files/217d6300-2bbe-4a51-aba4-0371c246dc9d\)](/eusurvey/files/217d6300-2bbe-4a51-aba4-0371c246dc9d)

[Privacy Statement FR \(/eusurvey/files/43cedbae-8123-4596-94ce-b526019329e5\)](/eusurvey/files/43cedbae-8123-4596-94ce-b526019329e5)

[Webtext DE \(/eusurvey/files/3abc4c0f-c0e6-4ece-99a3-2bebba8c65d3\)](/eusurvey/files/3abc4c0f-c0e6-4ece-99a3-2bebba8c65d3)

[Webtext FR \(/eusurvey/files/df02a573-838f-45e7-912d-8231ee8cdbcd\)](/eusurvey/files/df02a573-838f-45e7-912d-8231ee8cdbcd)

Contact

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