



Ensuring the protection of the rights of creators and artists in the development of generative AI

Joint voting recommendations on the proposed amendments to the JURI Committee draft report on copyright and AI

Brussels, 7 October 2025

Dear Member of the Legal Affairs (JURI) Committee,

We are writing to you on behalf of a coalition of professional organisations representing the collective voice of hundreds of thousands of journalists, performers, composers, songwriters, screen directors, screenwriters, translators, visual artists, illustrators and other artists and creative workers.

In July, MEP Axel Voss shared the draft report “Copyright and generative artificial intelligence – opportunities and challenges”, which our coalition warmly welcomed as it reflected several of the key concerns highlighted in our [letter to JURI from 19 June](#), including our calls to assess the applicability of the TDM exception, ensure a high level of transparency, and the ability for our members to authorise the use of their works by genAI and receive appropriate and proportionate remuneration for their exploitation.

Since the publication of the draft report, the final implementation package of the AI Act (GPAI Code of Practice, GPAI guidelines, and transparency template) failed to provide our members with effective and meaningful tools to enforce their rights, increasing the expectations for the European Parliament to ensure that the rights of the authors, performers, and creative workers we represent are respected.

Following the publication of the amendments, we are writing to provide our voting recommendations on several priorities that are crucial to our organisations:

Ensuring full and effective transparency for all models placed on the EU market, going beyond the insufficient requirements provided by the AI Act’s implementation and making sure trade secrets cannot be used to oppose transparency

- Support amendments 223, 230, 282, 320, 326, 327, 329, 330, 332, 337, 359, 361
- Reject amendments 325, 328, 358

Ensuring authors’, performers’, and creative workers’ fair and proportionate remuneration

- Support amendments 225, 233, 241, 242, 243, 249, 282, 297
- Reject amendments 229, 252, 255

Ensuring rightsholders' can authorise or refuse the use of their works, including through voluntary and sector-specific licensing agreements

- Support amendments 226, 231, 234–237, 239, 240, 245, 246, 247, 248, 253, 254, 262, 264, 265, 286, 303, 304, 305, 306
- Reject amendments 302, 307

Clarifying the application of Art. 4 of the CDSM Directive to generative AI

- Support amendments 217, 221, 279, 281, 291, 294, 295, 296, 298, 301, 355
- Reject amendments 216, 220, 222, 232

Establishing a presumption of use and related actions to facilitate rightsholders in exercising their rights

- Support amendments 338, 339, 341, 343, 348
- Reject amendments 340, 344

Facilitating the exercise and enforcement of rights reservations

- Support amendments 269, 270, 272, 274, 275, 320
- Reject amendment 268

Opposing the introduction of a new dedicated exception for genAI

- Support amendments 283, 284, 285
- Reject amendments 260, 266, 287-290, 292

Ensuring the labelling of AI-generated content and preventing unauthorised deepfakes

- Support amendments 278, 321, 323, 324, 350, 351, 370

Regulating other aspects of genAI services and online platforms and introducing liability rules

- Support amendments 221, 265, 336, 366, 367, 368

We call on you to urgently consider these recommendations to ensure that the final report adequately reflects that needs of Europe's creative community, and thank you for the efforts achieved so far on this important file. We remain at your disposal for any questions or clarification.

Voting recommendations – Overview

The list below outlines the complete list of voting recommendations (including the citations and recitals).

Supported amendments:

5, 15, 20, 22, 23, 25, 26, 28, 32, 33, 34, 35, 36, 37, 38, 39, 40, 44, 45, 47, 48, 50, 51, 52, 54, 56, 57, 58, 59, 62, 64, 69, 70, 71, 72, 74, 75, 78, 81, 82, 84, 85, 86, 87, 88, 89, 91, 92, 93, 95, 97, 99, 100, 102, 108, 110, 111, 112, 117, 118, 119, 122, 123, 124, 125, 128, 129, 130, 140, 143, 144, 147, 149, 150, 151, 152, 155, 156, 172, 174, 176, 177, 178, 181, 190, 191, 192, 193, 194, 196, 197, 200, 204, 207, 208, 209, 210, 212, 213, 214, 217, 221, 223, 225, 226, 228, 230, 231, 234, 235, 237, 239, 240, 241, 242, 243, 245, 246, 247, 248, 249, 253, 254, 262, 264, 265, 269, 270, 272, 274, 275, 278, 279, 281, 282, 283, 284, 285, 286, 291, 294, 295, 296, 297, 298, 301, 303, 304, 305, 306, 320, 321, 323, 324, 326, 327, 329, 330, 332, 336, 337, 338, 339, 341, 343, 348, 350, 351, 355, 359, 361, 366, 367, 368, 370

Rejected amendments:

42, 43, 49, 55, 60, 61, 63, 65, 66, 67, 68, 73, 76, 79, 90, 94, 98, 103, 104, 105, 106, 107, 109, 141, 142, 145, 146, 153, 154, 171, 173, 198, 199, 202, 203, 205, 206, 211, 216, 220, 222, 229, 232, 252, 255, 260, 266, 268, 287, 288, 289, 290, 292, 302, 307, 325, 328, 340, 344, 358

List of signatories

CEATL (European Council of Literary Translators' Associations) was created in 1993 as a platform where literary translators' associations from different European countries could exchange views and information, and join forces to improve status and working conditions of translators. It now unites 36 member associations from 27 countries across Europe, representing some 10,000 individual literary translators.

Web: www.ceatl.eu / EU Transparency Register ID: 65913704675-82

ECSA (European Composer and Songwriter Alliance) represents over 30,000 professional composers and songwriters in 29 European countries. With 59 member organisations across Europe, the Alliance speaks for the interests of music creators of art & classical music (contemporary), film & audiovisual music, as well as popular music.

Web: www.composeralliance.org / EU Transparency Register ID: 71423433087-91

EFJ (European Federation of Journalists) is the largest organisation of journalists in Europe, representing over 320,000 journalists in 73 journalists' organisations across 45 countries. The EFJ is recognised by the European Union and the Council of Europe as the representative voice of journalists in Europe. The EFJ is a member of the European Trade Union Confederation (ETUC).

Web: www.europeanjournalists.com / EU Transparency Register ID: 27471236588-39

EGAIR (European Guild for Artificial Intelligence Regulation) is a network of creatives and associations from all over Europe, lobbying for the protection of artists' works and data from AI companies. Originally founded by MeFu, the Italian association of comic book creators, EGAIR now represents over 20.000 creatives, artists and associations.

Web: www.egair.eu / EU Transparency Register ID: 385629348610-21

EIF (European Illustrators Forum) is a network of 23 national associations of illustrators based in 14 European countries representing over 12,000 illustrators. The EIF defends the rights of illustrators and promotes illustration within Europe and around the world. We represent our members' common interests by liaising with other networks and authorities of the European Union. The EIF furthers exchange of knowledge and critical debate between professional illustrators and their clients through conferences, exhibitions, research and education.

Web: <https://www.european-illustrators-forum.com>

FERA (Federation of European Screen Directors) represents film and TV directors at European level, with 48 directors' associations as members from 35 countries. Founded in 1980, FERA speaks for more than 20,000 European screen directors, representing their cultural, creative and economic interests.

Web: <https://screendirectors.eu> / EU Transparency Register ID: 29280842236- 21

FIA (International Federation of Actors) is a global union federation representing performers' trade unions, guilds and professional associations in about 70 countries. In a connected world of content and entertainment, it stands for fair social, economic and moral rights for audio-visual performers working in all recorded media and live theatre.

Web: www.fia-actors.com / EU Transparency Register ID: 24070646198-51

FIM (International Federation of Musicians) is the only body representing professional musicians and their trade unions globally, with members in about 65 countries covering all regions of the world. Founded in 1948, FIM is recognised as an NGO by diverse international authorities such as the ILO, WIPO, UNESCO, the European Commission, the European Parliament or the Council of Europe.

Web: <https://www.fim-musicians.org> / EU Transparency Register ID: 01953872943-65

FSE (Federation of Screenwriters in Europe) is a network of national and regional associations, guilds and unions of writers for the screen in Europe, created in June 2001. It comprises 25 organisations from 19 countries, representing more than 7,000 screenwriters in Europe.

Web: www.federationscreenwriters.eu / EU Transparency Register ID: 642670217507-74

IAO (International Artist Organisation) is the umbrella association for national organisations advocating for the rights and interests of the Featured Artists in the music industry. Our main interests are transparency, the protection of intellectual property rights and a fair reflection of the value an artist's work generates.

Web: www.iaomusic.org / EU Transparency Register ID: 490166825799-90

IFJ (International Federation of Journalists) is the world's largest organisation of journalists, representing 600,000 media professionals from 187 trade unions and associations in more than 140 countries.

Web: www.ifj.org / EU Transparency Register ID: 999725935832-94

UNI MEI - UNI - Media, Entertainment and Arts unites over 140 unions and guilds to raise standards and enforce rights for more than 500.000 creatives, technicians and auxiliary workers. Together, our members work for a fair, inclusive, equal, and sustainable global entertainment industry and a just transformation.

Web: www.uniglobalunion.org / EU Transparency Register ID: 605859248462-93

UVA (United Voice Artists) is a global coalition of voice acting guilds, associations, and unions that have united to pursue their shared goals of protecting and preserving the act of creating, in particular, through the human voice. This collaborative effort brings together prominent associations and unions from the European Union, including France, Spain, Italy, Germany, Austria, Belgium, and Poland, as well as organizations in Switzerland, Turkey, the United States of America, Africa and in South America.

Web: www.unitedvoiceartists.com / EU Transparency register ID: 810100650765-18