



## **the global trade body for independent music publishers**

### **IMPF response to “Call for evidence” consultation for Apply AI Strategy under the AI Continent Action Plan of the European Commission**

IMPF is the global trade and advocacy body for independent music publishers, helping to stimulate a more favourable business environment in different territories and jurisdictions for artistic, cultural, and commercial diversity for songwriters, composers, and music publishers everywhere.

IMPF welcomes the opportunity to respond to this first step of the public consultation relating to the Apply AI Strategy within the AI Continent Action Plan.

Independent music publishing continues to assert its critical role within the global music industry, showcasing steady growth and cultural significance, as important partners, key agents of cultural diversity and custodians of songs.

Independent publishers captured a 26.3% global market share in 2023. The global value of independent music publishing reached €2.57 billion in 2023, representing a 5.7% year-over-year growth. This marks an impressive 105.6% increase since 2018<sup>1</sup>. This continued growth demonstrates the value independent music publishing delivers on both a local and international level supported by a healthy copyright framework.

Independent music publishers are present in almost every country in the world, and their existence makes them active agents for cultural diversity, for multiple reasons:

- Their businesses are deeply rooted in the local economic, social and cultural fabric of their countries.
- They hire and train local staff, sign local talent, build IT networks to process royalty flows, participate in the life of the local collective management organisations, and pay local taxes, among other activities.
- They develop a network of like-minded partners around the world to sub-publish their catalogues and provide more opportunities for the talent they represent.
- They help expose talent they have signed locally and globally.
- They contribute to the economic growth of their respective countries and, when they achieve international success, it has a positive cultural and economic effect in their home base.

Music has entered a new era with AI, which will have a transformative impact on many levels. Whilst it can enhance royalty management and offer creative tools, GenAI also poses

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<sup>1</sup> Please find the full IMPF Global Market View Report from April 2025 here:

[https://www.impforum.org/wp-content/uploads/2025/03/IMPF-Global-Market-View-Independent-Music-Publishing-April\\_2025.pdf](https://www.impforum.org/wp-content/uploads/2025/03/IMPF-Global-Market-View-Independent-Music-Publishing-April_2025.pdf)

unprecedented challenges. We have to be clear that this is a different kind of disruption and therefore effective policies and guardrails that empower rather than replace songwriters and composers and their music publishers will be essential. The forthcoming Apply AI Strategy should therefore focus on how AI can strengthen and support the growth of the cultural and creative sector.

The EU has strong and vibrant cultural and creative industries, driving economic growth and employment. According to a report of the EU Intellectual Property Office in 2022, copyright-intensive sectors account for nearly 17 million jobs and 7% of the EU's GDP<sup>2</sup>.

Moreover, the recently published Eurobarometer survey shows that 87% of respondents believe culture and cultural exchange should have a very important place in the EU. Indeed it is shaping the cultural and intellectual fabric of European society. The contributions of the cultural and creative sector help forge a common European identity while fostering innovation.

Recognising the importance of the sector, IMPF welcomes that the European Commission envisages a separate AI strategy for the cultural and creative sector, which aims to ensure *“AI enables and reinforces human creativity rather than replace humans, and that it contributes to safeguarding European cultural and linguistic diversity”*.

However, culture should not only be discussed in isolation but should be positioned as a cross-cutting priority in EU policies. The importance of culture as well as the cultural and creative sector and its contribution to Europe's economic growth and job creation must have a place in all relevant policy discussions. The European Commission must therefore ensure close cooperation with European creators and stakeholders representing the cultural and creative sector at the outset and across the different initiatives including the Apply AI and the Data Union Strategy. IMPF welcomes continued dialogue with the European Commission.

IMPF is concerned that the Commission's focus on innovation, investment and potential productivity gains is over-looking the concerns of the cultural and creative sector today and will not be sufficient to ensure sustainable AI adoption in Europe.

According to a PMP Strategy study conducted at global level, potential consequences are laid out clearly highlighting that 24% of music creators and 21% of audiovisual authors' revenues are at risk by 2028<sup>3</sup>.

AI innovation and copyright protection are however not opposing forces but can - and must - reinforce each other in support of the development of a competitive, ethical<sup>4</sup>, and human-focused AI ecosystem in Europe.

GenAI models depend on massive datasets, often sourced by scraping copyrighted materials such as lyrics, compositions, and recordings. These models are trained without permission, payment, or even disclosure, effectively by-passing the foundational mechanisms that enable

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<sup>2</sup> [https://euipo.europa.eu/tunnel-](https://euipo.europa.eu/tunnel-web/secure/webdav/guest/document_library/observatory/documents/reports/IPR-intensive_industries_and_economic_in_EU_2022/2022_IPR_Intensive_Industries_FullR_en.pdf)

[web/secure/webdav/guest/document\\_library/observatory/documents/reports/IPR-intensive\\_industries\\_and\\_economic\\_in\\_EU\\_2022/2022\\_IPR\\_Intensive\\_Industries\\_FullR\\_en.pdf](https://euipo.europa.eu/tunnel-web/secure/webdav/guest/document_library/observatory/documents/reports/IPR-intensive_industries_and_economic_in_EU_2022/2022_IPR_Intensive_Industries_FullR_en.pdf)

<sup>3</sup> <https://www.cisac.org/Newsroom/news-releases/global-economic-study-shows-human-creators-future-risk-generative-ai>

<sup>4</sup> See also IMPF ethical guidelines for the development of AI: <https://www.impforum.org/wp-content/uploads/2023/10/IMPF-Ethical-Guidelines-on-generative-AI-docx.pdf>

the cultural and creative sector, including music publishers and the songwriters and composers they represent, to function.

AI developers frequently claim it is “impractical” to license content at scale. Yet, they have entered into licensing deals when pressured, demonstrating that where there is a will, there is a way. Assertions that individual works contribute negligible value to AI models also collapse under scrutiny. Just as every musician in an orchestra matters, every work in a dataset contributes to the model’s overall utility, particularly in fine-tuning and retrieval-augmented generation stages.

In the AI Continent Action Plan, the Commission correctly highlights the importance for the EU to “*maintain its own distinctive approach to AI by capitalising on its strengths and what it does best*” and “*ensuring AI is trustworthy and aligned with EU values*”. IMPF calls on the EU to continue leading in setting global norms for ethical, human centric and rights-respecting AI.

This must be paired with robust transparency obligations, including detailed disclosure of training data sources and processes. A transparency-first, license-based approach will ensure AI's success is built on respect for human creativity, not its exploitation.

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