IMPF

the global trade body for independent music publishers

IMPF Ethical Guidelines on generative Artificial Intelligence

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.

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[1]. 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 IMPF welcomes technological developments in as far as they improve our business and the capacity to assist the writers we represent (e.g. enhancing royalty management and offering creative tools, GenAI also poses unprecedented challenges.

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[1] 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

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[2].

We therefore 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. Policy-makers should therefore focus on how AI can strengthen and support the growth of the cultural and creative sector and continue to be a a significant driver of global and regional economic growth. Cultural and creative industries generate annual revenues of almost US$ 2.3 trillion globally, contributing 3.1 per cent of the global gross domestic product (GDP). In addition, UNESCO estimates that the cultural and creative industries account for 6.2 per cent of global employment[3].

AI innovation and copyright protection are not opposing forces but can - and must - reinforce each other in support of the development of a competitive, ethical[4], and human-focused AI ecosystem globally.

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 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.

IMPF supports the development of 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.

Key guiding principles:

Authorisation: Companies must seek express permission for the use of copyrighted content for AI model training. This reflects the main notion of copyright.

Transparency: Legislators must put in place and enforce robust transparency obligations, including detailed disclosure of training data sources and processes, enabling rightsholders to identify and enforce their rights effectively.

Remuneration: Creators and rightsholders must receive fair remuneration for the use of their copyrighted works. Collective rights management serves as an effective licensing framework,

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[2] https://www.cisac.org/Newsroom/news-releases/global-economic-study-shows-human-creators-future-risk-generative-ai

[3] https://unctad.org/system/files/official-document/ditctsce2024d2_en.pdf

[4] 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

offering legal certainty for users while safeguarding the interests of rightsholders, regardless of their scale.

Opt-out: Resources, time nor funding should be allocated toward the development of a centralised rights reservation repository, nor to initiate stakeholder consultations on technical standards that are impractical or unfeasible.

Territoriality: In order avoid forum-shopping and the (re)-location of AI model training activities to territories with low copyright protection, companies offering GenAI products and services in a particular market must be compliant with that market's copyright legislation.

Effective sanctions for non-compliance: Where AI model developers refuse to seek authorisation or do not provide the necessary transparency, policy-makers need to act quickly in introducing a rebuttable presumption of use.