



the global trade body for independent music publishers

## **IMPF Contribution to the Call for Evidence - Evaluation and Review of the Audiovisual Media Services Directive (AVMSD)**

19 December 2025

IMPF is the global trade and advocacy body for independent music publishers, representing more than 300 companies worldwide. Our members are deeply rooted in local cultural and economic ecosystems, investing in songwriters and composers, supporting cultural diversity, and enabling repertoire to reach audiences across borders.

Independent music publishers collectively account for over 26% of the global music publishing market, generating more than €2.7 billion in annual revenues, with sustained growth over recent years. This growth is underpinned by a functioning copyright framework that enables investment, risk-taking, and long-term cultural development.

### **1. Introduction and General Remarks**

IMPF welcomes the European Commission's decision to launch an evaluation and review of the Audiovisual Media Services Directive (AVMSD).

Since the last revision of the AVMSD in 2018, market realities have evolved significantly. Convergence between audiovisual, music, social media and platform-based services has accelerated, while algorithmic recommendation systems, cross-border streaming services and AI-driven content moderation increasingly shape what European audiences see and hear. These developments directly affect music creators and publishers, whose works are widely used, monetised and promoted across audiovisual, user-generated and platform environments.

IMPF therefore submits this contribution to ensure that music publishing interests and the position of songwriters and composers, they represent, are fully considered in the evaluation and future review of the AVMSD.

### **2. Convergence of Media Services and the Case for an Extended Scope**

The boundaries between audiovisual media services, music streaming services, video-sharing platforms and online content-sharing service providers have become increasingly blurred. Music is no longer consumed solely via audio-only services, but is deeply embedded in:

- video-on-demand catalogues and original productions,
- short-form video and social media platforms,
- influencer-driven and algorithmically curated environments, and
- hybrid services combining music, audiovisual content, podcasts and user-generated material.

While the AVMSD has progressively adapted to new audiovisual formats, music streaming services and certain platform-based intermediaries currently fall outside any harmonised EU framework comparable to the AVMSD, despite having an equivalent—or greater—impact on cultural consumption and diversity.

IMPF therefore invites the Commission to assess, as part of the review, whether:

- the scope of the AVMSD should be extended, or
- the Directive should evolve into a broader EU content framework,

in order to address converging media services in a technologically neutral and future-proof manner—without undermining the achievements of the existing AVMSD framework for the audiovisual sector.

## **2. Discoverability and Prominence of European Musical Works**

The AVMSD has demonstrated the effectiveness of EU-level intervention to ensure the prominence and discoverability of European works through catalogue quotas and visibility obligations for on-demand audiovisual services.

By contrast, music streaming platforms operate in a regulatory vacuum at EU level with regard to:

- discoverability of European musical works,
- diversity of genres, languages and repertoires,
- visibility of independent creators and publishers.

Algorithmic recommendation systems and curated playlists play a decisive role in determining market exposure, audience reach and long-term value creation. These systems increasingly shape cultural consumption, yet remain opaque and driven primarily by commercial considerations.

IMPF therefore supports:

- extending prominence and discoverability obligations to European musical works on music streaming platforms and relevant online content-sharing services;
- the development of EU-level diversity indicators allowing independent assessment of the visibility of European repertoires, including independent and local works;
- regular monitoring and reporting obligations to assess how European musical works are promoted within platform interfaces, curated playlists and recommendation systems.

Such measures would align with the AVMSD's cultural policy objectives and reflect the reality of today's convergent media landscape.

## **3. Algorithmic Transparency and Accountability**

Algorithmic transparency has become a central issue for cultural diversity, fair competition and trust in digital markets. From a music publishing perspective, there are growing concerns related to:

- stream manipulation and fraudulent activity distorting remuneration flows;
- artificial prominence of low-cost or AI-generated content to reduce royalty outflows;
- preferential promotion based on platforms' own commercial interests;
- "pay-for-visibility" practices that effectively trade exposure for lower remuneration.

While algorithms are essential for user experience, decisions that shape cultural visibility and economic outcomes should not remain entirely opaque or unaccountable.

IMPF therefore calls for the AVMSD review to consider:

- mandatory transparency and reporting obligations on recommendation and ranking systems across audiovisual and music-related platforms;
- oversight mechanisms ensuring that algorithmic practices do not undermine cultural diversity, independent creation or fair remuneration;
- coherence with the Digital Services Act, Digital Markets Act and forthcoming AI-related legislation, while recognising the specific cultural policy objectives of the AVMSD.

#### **4. Conclusions and Key Recommendations**

From the perspective of independent music publishers and songwriters, IMPF urges the Commission to ensure that the AVMSD review:

1. Recognises media convergence and the central role of music within audiovisual and platform-based ecosystems;
2. Addresses the regulatory gap affecting music streaming and content platforms, particularly regarding discoverability and algorithmic governance;
3. Extends prominence, transparency and reporting principles to European musical works where platforms function as de facto media gatekeepers.



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