



For an innovation and creator friendly AI Act

Europe's creative community urges EU policymakers to put transparency back at the heart of the EU AI Act

Brussels, 23rd November 2023

We represent the collective voice of hundreds of thousands of writers, translators, performers, composers, songwriters, screen directors, screenwriters, visual artists, journalists, and other creative workers whose human artistry lies at the core of the creativity that our societies cherish and enjoy on a daily basis.

As the AI Act is entering into the final round of negotiations, **we urge all policy makers to prioritise maximum transparency on training data and artificially generated content to provide guarantees to citizens, authors and performers that their rights are respected: transparency is a prerequisite for both innovation and creation to continue to grow for the benefit of all.**

Today, our members' protected works, voices, and images are used without their knowledge, consent and remuneration to generate content. Such uses may harm their moral, economic and personality rights and prejudice their personal and professional reputation and livelihood. They also present a broader societal and political risk as artificially generated or manipulated content can play a significant role in spreading misinformation and eroding trust in the authenticity of digital content.

We therefore strongly feel that the datasets used by generative AI should be informed by the highest level of transparency and **that the deployers of these technologies should prove that the training of their AI has been carried out in compliance with applicable EU and national law, whether related to intellectual property, the protection of personal data or other relevant provisions**. None of the protections built into the GDPR¹ and CDSM² Directive has the slightest chance to work if appropriate transparency requirements, **including strong record-keeping and transparency obligations regarding the use of copyright-protected content by generative AI models**, are not included in the EU AI Act. This is the precondition for authors, performers and other creative workers to seek to avail themselves of these protections, should they become aware of an unauthorised use.

We do believe however that the AI Act should also withstand the test of time and, for this reason, **that it should not explicitly mention specific mechanisms, such as the one in art. 4 of directive 2019/790, that are yet to prove their legitimacy and effectiveness in this evolving technological field.**

¹ [General Data Protection Regulation](#)

² [Directive on Copyright in the Digital Single Market](#)

The AI Act should also impose strict visible and/or audible labelling obligations to all deployers of generative-AI powered technologies, warning the public about the fact that what they are watching, listening to or reading has been altered or generated by AI. While these obligations may be adapted to the nature of the content in order not to hinder its exploitation, **we firmly reject broad exceptions that would render labelling obligations meaningless in practice.**

We therefore welcome and support the European Parliament and Spanish Presidency efforts to address these key issues, both with respect to the training of generative AI and the mandatory labelling of all content artificially generated or manipulated. **By contrast, we are deeply alarmed by the attempts to replace meaningful obligations with light touch self-regulation for foundation models and generative purpose AI.**

As time is of the essence, we urge European institutions to agree on a balanced regulation that not only fosters the development of AI technology and related businesses, but also guarantees a human-centric approach to creation that protects the rights and livelihoods of the authors and artists we represent.

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 34 member associations from 26 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 27 European countries. With 54 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

EWC (European Writers' Council) is the world's largest federation representing solely authors from the book sector and constituted by 49 national professional writers' and literary translators' associations from 31 countries. EWC members comprise over 220.000 professional authors, writing and publishing in 33 languages.

Web: <https://europeanwriterscouncil.eu> / EU Transparency Register ID: 56788289570-24

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