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POSITION PAPER

On the Call for Evidence: AI Strategy for Cultural & Creative Sectors

Berlin, 11 September 2026

I. Summary

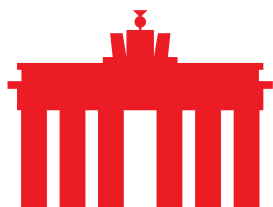
eco welcomes the European Commission's initiative to develop a dedicated AI strategy for the cultural and creative sectors (CCS). We share the Commission's ambition, as set out in the Culture Compass for Europe, to harness digital transformation for the benefit of European culture and creativity. AI presents a generational opportunity to strengthen European cultural diversity, empower creators and boost the competitiveness of the CCS, but only if policy choices are guided by evidence, coherence with the broader EU industrial strategy and a genuine understanding of how AI supports, rather than threatens, European cultural life. The following sections set out why eco sees this potential as significant, why AI literacy rather than restriction is the right response to legitimate public concerns, why the strategy must remain consistent with the existing copyright framework under review, and why the sector's future competitiveness depends on a coherent, evidence based approach across the EU's wider AI and industrial policy.

II. Detailed Assessment

1. AI Use in the Cultural and Creative Sectors

Artificial intelligence offers substantial opportunities for value creation and innovation across many sectors. While this is already widely discussed in the context of industry, the opportunities that AI presents for the cultural and creative sectors (CCS) receive comparatively little attention, and the public debate tends to focus instead on possible disadvantages for creative professionals. In eco's view, the potential of AI in this sector is considerable and extends well beyond pure productivity gains and process innovation.

AI tools are democratising creative production. Independent musicians, small publishers, regional theatres and minority language content creators now have access to capabilities that were previously available only to well resourced organisations. Studies commissioned by the European Commission on the opportunities and challenges of AI technologies for the cultural and



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creative sectors have found that AI enables new forms of artistic expression and enhances the capabilities of both professionals and amateurs across visual arts, music, publishing and heritage.

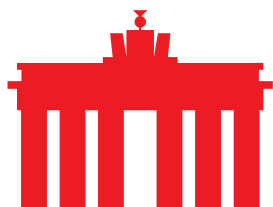
It is therefore not surprising that AI adoption in media and related parts of the sector already outpaces the average across the wider EU economy. At the same time, AI is helping to strengthen existing business models and to open up new ones. A number of publishers have entered into partnerships with AI providers, both to make their content usable for AI development and to integrate AI powered services directly into their own platforms. AI is also increasingly used within publishing houses to support content creation. Recent industry surveys point to a marked increase in planned investment in original, investigative journalism, precisely because AI is able to take over more commoditised forms of content production.

The sector's visual arts, design and cultural heritage branches show similar dynamics. The planned common European data space for cultural heritage is intended to make a very large number of digitised cultural objects available for AI training under fair licensing conditions, illustrating how public cultural infrastructure and AI development can be mutually reinforcing.

A central concern of this Call for Evidence is the impact of AI on cultural and linguistic diversity. eco shares this concern, but in eco's assessment the evidence points in the opposite direction from restriction. AI models trained on broad, diverse datasets, including European literary, musical, journalistic and heritage material, produce outputs that better represent European cultures and languages. Restricting access to European training data would instead ensure that AI systems are trained predominantly on non European sources, thereby underrepresenting European values, perspectives and languages. In the music sector, industry surveys consistently show that a large majority of music creators have already integrated AI into at least one part of their creative process, most commonly mastering, stem separation, arrangement and promotion, enabling independent artists without label or agency support to release music at a professional standard.

2. Strengthening AI Literacy and Skills

eco recognises the public concern in this area. Recent Eurobarometer research shows that a clear majority of Europeans are worried about the impact of generative AI on artists' employment. In eco's assessment, the most effective response to this concern is sustained investment in AI literacy and in creative AI skills, rather than restrictive regulation of the underlying technology.



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It should also be recalled that a framework providing legal certainty for AI training does not remove the commercial incentive for voluntary licensing. On the contrary, AI partnerships between technology providers and publishers, music labels and museums are expanding globally, reflecting a fast growing market for AI training data and content licensing. The EU strategy for the cultural and creative sectors should facilitate and encourage such voluntary partnerships rather than mandate particular licensing models.

The cultural and creative sectors are, however, structurally different from many other parts of the economy in that they are dominated by freelancers, micro enterprises and small organisations with very limited budgets for training or experimentation. Any AI literacy initiative under this strategy should therefore be designed with this fragmented structure in mind, offering practical, low threshold and sector specific training rather than generic digital skills programmes. Support should reach individual creators and small studios directly, not only larger institutions that already have the resources to build internal AI capacity on their own.

eco also sees a particular need to strengthen AI literacy among cultural education and training institutions, so that relevant skills are embedded early in the professional formation of artists, journalists, designers and other creative professionals rather than added later as a corrective measure.

Finally, AI literacy should not be understood only as a defensive response to concerns about job displacement, but equally as a means of building trust and transparency between creators, cultural institutions and their audiences. Creative professionals who understand how AI tools work are better placed to make informed decisions about when and how to use them, to communicate these choices to their audiences, and to negotiate fair terms with technology providers and licensing partners. eco stands ready to support such literacy efforts through its network of member companies active in the digital economy.

3. The Broader Economic Perspective

The wider economic context for this strategy cannot be ignored. The EU currently captures only a small single digit share of global AI venture capital, compared with a share exceeding two thirds captured by the United States, and produces only a small fraction of the world's notable frontier AI models each year compared with the United States and China. Recent industry analysis has estimated that a substantial share of the EU's annual AI related economic value would be put at risk by a restrictive rewriting of EU AI and copyright rules.



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At the same time, the Commission has committed significant public funding to AI infrastructure, including through its Gigafactories initiative under the Tech Sovereignty Package. This substantial supply side investment requires corresponding demand side conditions. A cultural and creative sectors strategy that signals hostility toward AI training would sit uneasily alongside this investment, creating what might be described as an infrastructure paradox, in which the EU builds AI capacity while simultaneously constraining the legal conditions needed to use it. The strategy must therefore be coherent with the AI Continent Action Plan, the Apply AI Strategy, which itself foresees significant EU funding leverage for culture through general AI initiatives, and the Draghi Report on European competitiveness

About eco: With approximately 1,000 member companies, eco (international.eco.de) is the leading Association of the Internet Industry in Europe. Since 1995, eco has been highly instrumental in shaping the Internet, fostering new technologies, forming framework conditions, and representing the interests of its members in politics and international forums. eco has offices based in Cologne, Berlin and Brussels. In its work, eco primarily advocates for a high-performance, reliable and trustworthy ecosystem of digital infrastructures and services.