



RECOMMENDATIONS on AI and COPYRIGHT on

Draft report Axel Voss (PE775.433v01-00)

Copyright and generative artificial intelligence – opportunities and challenges (2025/2058(INI))

Having analysed the proposed amendments to the Draft report on Copyright and generative artificial intelligence – opportunities and challenges CEPIC's recommendations focus on the following priorities:

1 A fair eco-system must be established, allowing both rightsholders and AI producers to thrive.

We therefore agree with the following amendments:

- **Amendment 51** which stresses that voluntary compliance by GenAI providers is insufficient and requires strong measures to ensure that AI ecosystem in Europe is fair and ethical.
- **Amendment 255** to strengthen transparency obligations to re-establish a fair eco-system

2 Contractual Freedom is key.

We therefore agree with:

- **Amendments 33-36** that rightsholders should be able to license and enforce their rights;
- **Amendment 76** which stresses that strong respect for copyright and contractual freedom are the backbone of creative industries;

- **Amendments 255 and 257** which reject interim remuneration schemes; reaffirm exclusive rights and contractual freedom; link any remuneration to authorised licensing and transparency; maintain consistency with EU copyright *acquis*

We therefore disagree with:

- **Amendments 252, 253, 256 and 259.** These Amendments support the introduction of *interim and collective remuneration mechanisms* for AI providers—This is contrary to CEPIC’s position that remuneration should *primarily derive from authorised licensing under exclusive rights*.
- **Amendments 304 and 305.** These Amendments recommend collective licensing as the *default framework* for AI training, whereas CEPIC supports only *voluntary, interoperable and complementary systems*

3 Any legal framework for GenAI must comply with the EU copyright *acquis*.

We therefore agree with:

- **Amendment 64** which stresses that the AI Act does not aim to alter the existing legal framework applying to copyright and related rights.
- **Amendment 296** that Article 4 CDSM was not designed to cover AI training; GenAI training requires prior authorisation unless expressly permitted; standardised machine readable opt-out must be fully respected by AI providers.

4 A potential EUIPO Register should be interoperable and complementary.

We therefore agree with:

- **Amendment 318** to Assign EUIPO responsibility for a central, voluntary and interoperable register of opt-outs; ensure complementarity with other rights-reservation systems; prohibit implicit licences; record opt-outs / licences in machine-readable form; provide EUIPO with adequate resources
- **Amendment 132** to Establish a machine-readable, EUIPO managed opt-out registry, voluntary, complementary and interoperable with existing systems; no implicit licence.

We therefore disagree with:

- **Amendments 310-311-312-313-319.** These Amendments envisage the EUIPO as a *trusted intermediary or mediation body*, exceeding CEPIC’s call for a limited, technical, and voluntary role.
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5 AI-only outputs lack human authorship and must remain uncopyrightable under EU law.

We therefore agree with:

- **Amendments 350-354** to Specify that works generated “fully” by AI cannot qualify for copyright protection and remain outside the scope of exclusive rights.

We would like to thank the MEPs who incorporated these recommendations into their amendments, and we urge all JURI MEPs to ensure that the final report adequately reflects the needs of Europe’s creative industry.

About CEPIC:

CEPIC represents hundreds of picture libraries and agencies, which represent hundreds of thousands of photographers whose core business is licensing visual content directly, both online and offline. As rightsholders, picture libraries and agencies licence digital assets for all kinds of commercial use to clients such as newspapers, magazines, advertising agencies and broadcasters. CEPIC members continuously adapt to innovative technology, developing sophisticated digital platforms to market digital content online and provide digital access to images.

CEPIC's purpose is to act as a united voice for the visual media industry in Europe and beyond.

[CEPIC – Global Hub for Visual Media Licensing and Copyright Advocacy](#)