

CALL FOR EVIDENCE FOR AN INITIATIVE (without an impact assessment)	
TITLE OF THE INITIATIVE	AI Strategy for the Cultural and Creative Sectors
LEAD DG – RESPONSIBLE UNIT	Directorate-General for Education, Youth, Sport and Culture – Unit D1 for Cultural Policy
LIKELY TYPE OF INITIATIVE	Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions
INDICATIVE TIMING	Q1-2027
ADDITIONAL INFORMATION	-
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A. Political context, problem definition and subsidiarity check
Political context The Culture Compass for Europe underlines the need to harness digital transformation, including Artificial Intelligence (AI), in the Cultural and Creative Sectors (CCS), which include both non market and market oriented cultural and creative sectors and industries. The Compass announces among its flagship actions a new targeted strategy on AI and the CCS. Such a strategy responds to the Commission’s political guidelines for 2024-2029. In his mission letter, the Commissioner for Intergenerational Fairness, Youth, Culture and Sport is asked to work closely with Executive Vice-President for Tech Sovereignty, Security and Democracy in developing a dedicated AI strategy for the CCS. The Strategy will build on the AI Continent Action Plan, and complement the Apply AI Strategy, and other relevant initiatives such as the AI Act. To foster a conducive fair environment for AI and Culture, the strategy will be closely aligned with the ongoing work on the review of the Copyright in the Digital Single Market Directive and on the targeted initiative for a better copyright environment for European creativity and innovation, for which a Call for Evidence has been published on 13 May.
Problem the initiative aims to tackle. AI is profoundly revolutionising the creation, preservation, interaction, and experience of art and culture. While it opens new opportunities, it also poses challenges that require targeted action. EU actions have already been taken to address opportunities and concerns, notably through initiatives such as the Apply AI strategy, which fosters AI uptake in strategic sectors including the CCS, and, at legislative level, the AI Act, which includes transparency obligations and provisions supporting compliance with copyright law. However, the Commission has yet to define a holistic strategic AI vision for these sectors which have a unique role in supporting European identity, democracy, social cohesion, competitiveness, and global influence. AI brings opportunities to the CCS, by boosting creativity and enhancing capabilities of professionals or amateurs; by increasing efficiency with automating tasks in certain areas; and by fostering inclusive audience engagement, improving accessibility and personalisation of the cultural offer. At the same time, the CCS can also contribute to AI development by providing fair access to high-quality sectorial data. For example, the common European data space for cultural heritage will make available over 30 million digital cultural objects for AI training, with fair and normalised licensing, as required by the Data Union strategy. However, AI also raises legal and economic challenges, such as the licensing of copyrighted works for AI uses, the unauthorised use of artists’ image and voice, and the growing propagation of AI-generated content. Other AI risks concern the impact on cultural and linguistic diversity and the discoverability of European cultural content due to biases in algorithmic recommendations, insufficient diversity in training data, and the dominance of mainstream content or languages; and pressure on creative jobs, requiring strong needs in terms of AI literacy, upskilling and reskilling. Public perceptions reflect some of these concerns. According to the 2025 Special Eurobarometer on Europeans’ attitudes towards culture over 8 in 10 Europeans prefer content created by humans

over AI-generated content, however less than half of Europeans (48%) say they could tell the difference between an AI-generated piece of art and one crafted by a human. In addition, almost 3 in 4 Europeans (73%) are concerned about the impact that the rise of GenAI may have on employment or earnings for artists. Besides, there is a risk of reinforced inequalities in particular for small companies and organisations with limited access to AI resources (from computing power to funding, high-quality data, and expertise). Uneven adoption and over-reliance on non-EU technology are other challenges European CCS face.

Basis for EU action (legal basis and subsidiarity check)

Legal basis

This initiative is non-legislative. Article 167 TFEU on culture requires the Union to contribute to the flowering of the cultures of the Member States, while respecting their national and regional diversity and at the same time bringing the common cultural heritage to the fore. Action by the Union shall aim at encouraging cooperation between Member States and, if necessary, supporting and supplementing their action.

Practical need for EU action

This initiative aims to support the CCS in addressing the AI opportunities and challenges, with the ultimate objective to support innovation and competitiveness while fostering European cultural and linguistic diversity. An overarching shared approach at European level would be highly beneficial given the global reach of the technology, the pervasive digitalisation of today's cultural production and consumption and the observed impacts on European CCS. The Commission should take the lead by offering strategic and policy guidance, leveraging funding programmes and defending the European interests in international cultural fora. Many European-level stakeholders' associations as well as the Member States and the European Parliament have expressed the need to adopt European measures that enable these sectors to better benefit from the opportunities and respond to the challenges raised by AI.

B. What does the initiative aim to achieve and how

The strategy will lay down an overarching strategic vision for the use of AI in the CCS that is forward-looking and benefits the European CCS, citizens, and the broader cultural landscape. It will adopt a whole-of-Commission approach to make the most of existing policy tools. Complementing and building on the Apply AI strategy, the strategy will contribute to supporting innovation, promoting European cultural diversity and unleashing AI for European digital cultural sovereignty by fostering collaboration between cultural and AI actors while promoting the sustainability of the creative economy and addressing the challenges the CCS face in relation to the rapid development of AI technologies. It will promote an approach to AI that reinforces human creativity, cultural and linguistic diversity and inclusion, and respects creators' rights.

Two main orientations should guide this approach: first, AI should complement and not replace human creativity and agency; second, AI should be used to support progress, facilitate broader access to culture and knowledge, and enhance creativity. In the spirit of the Joint Declaration Europe for Culture- Culture for Europe, the following guiding principles should serve as inspiration for the strategy: (1) technology at the service of culture, (2) support to genuine human creation and protection of creators' rights, (3) protection and promotion of cultural and linguistic diversity and inclusion alongside broader access to diverse cultural content and knowledge, notably for young people, (4) long-term sustainability and EU sovereignty of the creative economy, and (5) preparedness and future-proof policymaking. Accordingly, the strategy is expected to be structured around the following three pillars: (1) Fostering innovation and competitiveness through collaboration between CCS and European AI developers; (2) Promoting fair business models and ethical use of AI in the CCS and protecting European creation and original content, and cultural and linguistic diversity; and (3) Equipping the CCS for their successful digital and AI transition: identifying the support and adaptations needed to grasp opportunities, while protecting creativity, agency and cultural content and supporting broader access to diverse cultural content and knowledge. The strategy will bring together existing and new initiatives in a comprehensive framework to support the CCS in leveraging AI while mitigating risks. It will propose a set of measures, leveraging existing EU funding schemes such as Creative Europe, Digital Europe and Horizon Europe programmes, and serve as a strategic anchor for future initiatives under the next MFF 2028-2034.

This call for evidence is complementary to the joint Call for Evidence on the review of the CDSM Directive and a targeted initiative for a better copyright environment for European creativity and innovation, which notably mentions issues related to the licensing and enforcement of copyright and related rights in the context of AI.

Likely impacts

The impact of Digitisation and AI on the CCS has been extensively documented in reports published by the European Commission (e.g. 2026 Study on the discoverability of diverse European cultural content in the digital environment - Publications Office of the EU; 2025 Generative AI Outlook Report, 2022 Study on Opportunities and Challenges of AI Technologies for the Cultural and Creative Sectors) and stakeholders (e.g. 2026 The case for Public AI: making it happen with cultural heritage by the Europeana Initiative, 2025 Report of the Independent Expert Group on Artificial Intelligence and Culture by UNESCO, 2024 Study on the economic impact of Generative AI in the Music and Audiovisual industries by CISAC). This initiative is expected to support the European CCS in actively leveraging the AI transformation in ways that boost innovation and cross sectoral collaboration, respect and promote European cultural diversity and underpin the sustainability of the CCS by building capacity among European cultural and creative operators to better grasp the opportunities offered by technological developments and overcome related challenges.
Future monitoring To assess and monitor the results of the proposed initiative, the Commission will rely on existing tools for data collection and programme implementation monitoring, including stock taking such as data gathered through Horizon Europe research and innovation projects and the Feedback to Policy exercises conducted by the European Education and Culture Executive Agency or Research Executive Agency in cooperation with the respective Policy DGs. In addition, Eurostat is continuously revising its methodology to cover culture more accurately and might therefore offer monitoring solutions in the medium to long-term, along with the soon to be launched EU Cultural Data Hub that will be designed to collect and analyse cultural data, synthesise evidence, monitor trends and developments. The AI Observatory, announced in the Apply AI strategy, will also provide monitoring tools on AI uptake. The Commission could potentially rely on external experts for evaluation, monitoring, and analysis. Moreover, the Commission will engage with Member States and concerned stakeholders through specific coordination mechanisms and structured dialogue. Such mechanisms offer will give the possibility to monitor the implementation of the strategy, its impact and the extent to which its objectives have been successfully achieved.
C. Better regulation
Impact assessment An impact assessment is not being conducted since the initiative falls within the scope of communications, action plans, strategies, or recommendations that outline a general policy approach without committing to specific, binding actions. According to the EU's Better Regulation rules, such non-legislative initiatives typically do not require an impact assessment since they primarily aim to provide strategic direction, foster coordination, and guide future actions rather than impose direct regulatory changes or commitments. This is the case of this initiative.
Consultation strategy The consultation strategy for this initiative will revolve around four activities: 1) a Call for Evidence (the present document) designed to inform the public and stakeholders about this initiative to collect feedback on the Commission's understanding of the problem and possible solutions; 2) stakeholders workshops with relevant stakeholders, intended to deepen knowledge on the distinctive impacts of AI on the CCS as well as to test, refine, and operationalise policy ideas; 3) a targeted stakeholders survey open to relevant stakeholders and aiming to collect more in-depth elements related to the identified key orientations and map stakeholders' priorities, including, when relevant, at sub sectoral levels; and 4) a high-level policy dialogue with selected representatives from the CCS, including those organised within the framework of the Culture Compass dialogue, with the objective to validate insights gathered in the previous consultation activities. The initiative will also be subject to a youth check. Consultation activities will run in parallel to consultations on the targeted initiative for a better copyright environment for European creativity and innovation, and will be designed to avoid unnecessary burden and duplications
Why we are consulting? The opportunities and challenges brought about by AI in the CCS are complex, with strong technical, economic, and societal dimensions. The European Commission is consulting stakeholders to inform its policymaking in this area.
Target audience This call for evidence is addressed to stakeholders across the CCS (including artists, creators, rightsholders, cultural heritage institutions and professional and sectoral associations) as well as AI providers and developers, researchers, and public authorities with competence in cultural policy. Citizens are invited to contribute to this

initiative on the future of creativity and give their views on access to culture, European creation, preservation and promotion of cultural diversity and ethical innovation in the age of AI.