



# Public consultation on the role of publishers in the copyright value chain and on the 'panorama exception'

Fields marked with \* are mandatory.

## General information about you

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Fields marked with \* are mandatory.

\*

I'm responding as:

- An individual in my personal capacity
- A representative of an organisation/company/institution

\*Please provide your first name:

Krisztina

\*Please provide your last name:

Rozgonyi Dr. iur.

\*

Please indicate your preference for the publication of your response on the Commission's website:

- Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
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\*Please enter the name of your institution/organisation/business.

Media Governance and Industries Research Lab, University of Vienna

What is your institution/organisation/business website, etc.?

<http://mediagovernance.univie.ac.at>

\*What is the primary place of establishment of the entity you represent?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Italy
- Ireland
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

\*

My institution/organisation/business operates in: *(Multiple selections possible)*

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Italy
- Ireland
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

\*

Is your organisation registered in the [Transparency Register](#) of the European Commission and the European Parliament?

- Yes
- No

\*

Please indicate your organisation's registration number in the Transparency Register.

Media3314401793

## The role of publishers in the copyright value chain

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In its Communication Towards a modern, more European copyright framework of 9 December 2015, the Commission has set the objective of achieving a well-functioning market place for copyright, which implies, in particular, "the possibility for right holders to license and be paid for the use of their content, including content distributed online." [1]

Further to the Communication and the related stakeholders' reactions, the Commission wants to gather views as to whether publishers of newspapers, magazines, books and scientific journals are facing problems in the digital environment as a result of the current copyright legal framework with regard notably to their ability to licence and be paid for online uses of their content. This subject was not specifically covered by other public consultations on copyright issues the Commission has carried out over the last years. In particular the Commission wants to consult all stakeholders as regards the impact that a possible change in EU law to grant publishers a new neighbouring right would have on them, on the whole publishing value chain, on consumers/citizens and creative industries. The Commission invites all stakeholders to back up their replies, whenever possible, with market data and other economic evidence. It also wants to gather views as to whether the need (or not) for intervention is different in the press publishing sector as compared to the book/scientific publishing sectors. In doing so, the Commission will ensure the coherence of any possible intervention with other EU policies and in particular its policy on open access to scientific publications. [3]

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### Selection

Do you wish to respond to the questionnaire "The role of publishers in the copyright value chain"?

- Yes *(Please allow for a few moments while questions are loaded below)*
- No

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[1] [COM\(2015\)626 final](#).

[2] Neighbouring rights are rights similar to copyright but do not reward an authors' original creation (a work). They reward either the performance of a work (e.g. by a musician, a singer, an actor) or an organisational or financial effort (for example by a producer) which may also include a participation in the creative process. EU law only grants neighbouring rights to performers, film producers, record producers and broadcasting organisations. Rights enjoyed by neighbouring rightholders under EU law generally include (except in specific cases) the rights of reproduction, distribution, and communication to the public/making available.

[3] See Communication [COM\(2012\) 401](#), Towards better access to scientific information: Boosting the benefits of public investments in research, and Recommendation [C\(2012\) 4890](#) on access to and preservation of scientific information.

## Category of respondents

\*Please choose the category that applies to your organisation and sector.

- Member State
- Public authority
- Library/Cultural heritage institution (or representative thereof)
- Educational or research institution (or representative thereof)
- End user/consumer/citizen (or representative thereof)
- Researcher (or representative thereof)
- Professional photographer (or representative thereof)
- Writer (or representative thereof)
- Journalist (or representative thereof)
- Other author (or representative thereof)
- Collective management organisation (or representative thereof)
- Press publisher (or representative thereof)
- Book publisher (or representative thereof)
- Scientific publisher (or representative thereof)
- Film/audiovisual producer (or representative thereof)
- Broadcaster (or representative thereof)
- Phonogram producer (or representative thereof)
- Performer (or representative thereof)
- Advertising service provider (or representative thereof)
- Content aggregator (e.g. news aggregators, images banks or representative thereof)
- Search engine (or representative thereof)
- Social network (or representative thereof)
- Hosting service provider (or representative thereof)
- Other service provider (or representative thereof)
- Other

## Questions

1. On which grounds do you obtain rights for the purposes of publishing your press or other print content and licensing it? (*Multiple selections possible*)

- transfer of rights from authors
- licensing of rights from authors (exclusive or non-exclusive)
- self-standing right under national law (e.g. author of a collective work)
- rights over works created by an employee in the course of employment
- not relevant
- other

Please explain

2. Have you faced problems when licensing online uses of your press or other print content due to the fact that you were licensing or seeking to do so on the basis of rights transferred or licensed to you by authors?

- yes, often
- yes, occasionally
- hardly ever
- never
- no opinion
- not relevant

If so, please explain what problems and provide examples indicating in particular the Member State, the uses you were licensing, the type of work and licensee.

3. Have you faced problems enforcing rights related to press or other print content online due to the fact that you were taking action or seeking to do so on the basis of rights transferred or licenced to you by authors?

- yes, often
- yes, occasionally
- hardly ever
- never
- no opinion
- not relevant

If so, please explain what problems and provide examples indicating in particular the Member State, the type of use and the alleged infringement to your rights.

4. What would be the impact on publishers of the creation of a new neighbouring right in EU law (in particular on their ability to license and protect their content from infringements and to receive compensation for uses made under an exception)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

The controversial outcomes in Spain and in Germany of introducing ancillary copyright to news publishers in 2014 should be seen as a serious warning on the potential implications of such rules in EU copyright law: in Spain Google News stopped operating in December 2014, while in Germany publishers granted a license to Google exempting it from the law there, after having suffered a major drop in page view numbers with the copyright law in effect. There is also evidence that news aggregators „expand the market for the original sources, rather than shrink it by acting as a substitute“ (see e.g. the study commissioned by the Spanish Association of Publishers of Periodical Publications (AEEPP).

The legitimacy of certain related rights (‘Leistungsschutz’) to copyright in the digital era are subject of severe criticism (Hugenholtz 2016). Discussions in the EU about potential introduction of new ancillary copyright to publishers are highly debated today, questioning the rationale and potential impact of those measures to newly emerging ways of citizen engagement with digital production (e.g. citizen journalism).

In our view creating a new neighbouring right for publishers would have a strong negative impact on emerging creative practices and the making of culture in Europe by its citizens.

5. Would the creation of a new neighbouring right covering publishers in all sectors have an impact on authors in the publishing sector such as journalists, writers, photographers, researchers (in particular on authors' contractual relationship with publishers, remuneration and the compensation they may be receiving for uses made under an exception)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

There are major concerns about the necessity and legitimacy of other, already existing related rights (e.g. of phonogram producers'). We believe the potential impact of an ancillary copyright to publishers in all sectors would potentially not benefit authors as it might be controversially effecting the ability of creative industries to develop innovative, new business and revenue models. Furthermore, under the current legislative framework in Europe, publishers are already entitled to stipulate favourable terms and conditions. The introduction of an ancillary copyright would only favour publishers operating according to traditional business models and would ignore all recent developments in open access publishing.

Also, the broader social costs of introducing such a right are too high, such as limitations to access to information, therefore the interests of the public should be carefully investigated. We recommend thorough risk and impact assessment before introducing such measures.

6. Would the creation of a neighbouring right limited to the press publishers have an impact on authors in the publishing sector (as above)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

We raise our concerns about the potential impact of an ancillary copyright to publishers with regards to the benefits of individual journalists, especially taking into account non-professional journalists. Authors publishing under developing and widespread, new licensing practices, e.g. under Creative Commons licenses, would face severe problems as their works would still be subject to ancillary copyright.

The introduction of an ancillary copyright would also negatively impact access practices of both professional and non-professional journalists' as it would limit available information of easy availability and raise prices of them. We believe therefore, that the creation of a neighbouring right even limited to press publishers will have a strong negative impact on authors in the publishing sector.

7. Would the creation of a new neighbouring right covering publishers in all sectors have an impact on rightsholders other than authors in the publishing sector?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

Definitely yes. Today the notion of 'authorship' is much more complex, as in the era of digital content and with the rise of new actors and new value chains in the creation of content, it is hard to answer 'who' are those benefiting or being negatively impacted by the introduction of new policy measures.

The historically envisioned individual creator of works under copyright protection has transformed into the system of rights assignments, royalty agreements and collective representation of the authors with the rise of the creative industries. The notion of authorship - also as a core element in antipiracy campaigns - has changed dramatically over the course of market development and through sharing and changing production practices (Sarikakis és Rodriguez-Amat 2014), (Sarikakis, Krug und Rodriguez-Amat 2015), calling for revised policies on incentives for the 'original' authors.

Users of copyrighted works in the digital media markets are also contributors as authors of those contents to newly created works, generally called User Generated Content (hereinafter, "UGC"). The distribution of UGC follows the use of social media platforms, whose operators (e.g. Facebook, Twitter, Instagram) are the emerging new actors of the media industries.

Although the platforms are perceived by their users generally as neutral service provisions for the better availability and accessibility of their UGC among their peers, in reality these platforms claim certain licences and share in ownership of the copyrighted works. The general terms of services, which must be "accepted" by users, are granting operators with a wide range of rights over UGC.

Copyright policies aiming to address the creators, the authors of copyrighted works should also take into account the changing nature of 'works' as co-authored and co-owned creations and thus carefully define the roles and responsibilities of the actors involved in the creative process. We lack empirical evidence that such measures will be beneficial either for the public or for the market. We recommend again thorough research and impact assessment before introducing such measures.

8. Would the creation of a neighbouring right limited to the press publishers have an impact on rightholders other than authors in the publishing sector?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

As discussed in previous questions, we believe the introduction of a new neighbouring right would have potential negative effects in other sectors as well (spill-over effect).

9. Would the creation of a new neighbouring right covering publishers in all sectors have an impact on researchers and educational or research institutions?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

The Open Access practice in academic publishing has contributed to the debates on the impact of neighbouring right of publishers for knowledge generation and distribution. Open Access offers increased visibility and higher citation rates, good findability of academic works by the general public, promotion of international and inter-disciplinary cooperation, enhanced research efficiency through early discussion of findings. These aims are at odds with the idea of an ancillary right to publishers.

We believe these considerations must be fully addressed in order to avoid stifling of innovation, research and development, loss of public and expert trust and other even unknown negative impacts of introducing a new neighbouring right.

10. Would the creation of a neighbouring right limited to press publishers have an impact on researchers and educational or research institutions?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

A new ancillary copyright to publishers would have potentially negative effects to education and research institutions, and its limitation to the press sector would only mitigate these negative impacts, but not avoid them.

11. Would the creation of new neighbouring right covering publishers in all sectors have an impact on online service providers (in particular on their ability to use or to obtain a licence to use press or other print content)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

The introduction of an ancillary right will be highly negative to digital native publishers and distributors of news. The adoption of a new neighbouring right covering publishers in all sectors would have significant negative consequences for online service providers, as it would require another arrangement for rights clearance, making any viable business case scenario for new, innovative service providers harder to achieve.

With the introduction of a new neighbouring right, rights clearance will become more complex for cultural heritage institutions (CHIs) wishing to digitise and make their collections available online. For CHIs there are already several copyright-related barriers to overcome before access to digitised material can be provided (Kalshoven, 2014). As the scope of works under copyright and neighbouring rights protection varies significantly across MSs, identifying rightholders who can give permissions is often arduous. Requiring or paying for multi-territorial licences necessary for use of works online is also associated with high costs (Schroff, 2015). Complex and varying copyright frameworks, costly and burdensome licensing, uncertain implications of new licensing regimes on orphan works and excessively long protection term is the legal framework within which CHIs must fulfil their public mission today, therefore any additional licensing burden - administrative and financial - would have negative consequences.

Our recommendation is to conduct a thorough impact assessment before introducing such measures.

12. Would the creation of such a neighbouring right limited to press publishers have an impact on online service providers (in particular on their ability to use or to obtain a licence to use press content)?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

As outlined in the response to the previous question, the adoption of a new neighbouring right would have negative impact to online services in general, and limiting its scope to press publishers won't significantly mitigate such consequences.

13. Would the creation of new neighbouring right covering publishers in all sectors have an impact on consumers/end-users/EU citizens?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

There are major questions and concerns raised by the potential impact of an ancillary copyright to publishers. The broader social cost of introducing such right is high, therefore the interests of the public should be carefully investigated. We believe that with the introduction of a new layer of licensing, consumers and end-users in the EU would face additional hurdles in accessing information in general, and creating UGC specifically. This is contrary to an inclusive and open digital single market. We recommend a thorough impact assessment before introducing such measures.

14. Would the creation of new neighbouring right limited to press publishers have an impact on consumers/end-users/EU citizens?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

As outlined in the response to the previous question, the adoption of a new neighbouring right would have negative impact to online services in general, and limiting its scope to press publishers will not significantly mitigate such consequences.

15. In those cases where publishers have been granted rights over or compensation for specific types of online uses of their content (often referred to as "ancillary rights") under Member States' law, has there been any impact on you/your activity, and if so, what?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain, indicating in particular the Member State.

In our country of residence (Austria) no ancillary copyright has been introduced so far, therefore the implications of the German and of the Spanish cases had only indirect effect.

16. Is there any other issue that should be considered as regards the role of publishers in the copyright value chain and the need for and/or the impact of the possible creation of a neighbouring right for publishers in EU copyright law?

- Yes
- No

If so, please explain and whenever possible, please back up your replies with market data and other economic evidence.

With the advent of digital content, the dynamics of the creative industries and the media markets has changed fundamentally. New products and services, new value chains and new actors have emerged calling for the governance of adaptive policy frameworks to protect the underlying values driving those markets. New technologies and digitization have severely impacted incentives to creativity, enablers and impediments of the flow of digital works, enforcement costs and benefits and the way to balancing between the competing claims of copyright stakeholders (Merrill, Raduchel und (Eds.) 2013, 35-36). The need for copyright systems to adapt to the needs of digital markets and economies while addressing the social, cultural and political impacts has called for new approaches in policy-making but also for more careful empirical research on the real effects of those changes to the fundamental claims of copyright protection (Towse 2015).

Incentivizing creativity and investments in the creative media industries are one of those concerns, and the economic incentives of creativity and copyright protection should be at the forefront of interests of policy-makers. Also, the claim of copyright infringements and their impact on dis-incentivizing innovation is highly contradictory, ambiguous, patchy (Cammaerts, Bart; Mansell, Robin; Meng, Bingchun 2013), (Merrill, Raduchel und (Eds.) 2013). It is therefore of greatest importance to address the key issues governing copyright in Europe with utmost care to the wider social and political issues of the citizenry and refrain from the introduction of new punitive measures.

In our view, the introduction of a new copyright protection would not solve the core issues and problems quality news publishers are faced with, but could worsen their position and the achievements on freedom to information as well. We recommend more throughout research and policy analyses on the potential incentives to news publishing in the digital markets.

**Use of works, such as works of architecture or sculpture, made to be located permanently in public places (the 'panorama exception')**

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EU copyright law provides that Member States may lay down exceptions or limitations to copyright concerning the use of works, such as works of architecture or sculpture, made to be located permanently in public places (the 'panorama exception') [1] . This exception has been implemented in most Member States within the margin of manoeuvre left to them by EU law.

In its Communication Towards a modern, more European copyright framework, the Commission has indicated that it is assessing options and will consider legislative proposals on EU copyright exceptions, among others in order to "clarify the current EU exception permitting the use of works that were made to be permanently located in the public space (the 'panorama exception'), to take into account new dissemination channels." [2]

This subject was not specifically covered by other public consultations on copyright issues the Commission has carried out over the last years. Further to the Communication and the related stakeholder reactions, the Commission wants to seek views as to whether the current legislative framework on the "panorama" exception gives rise to specific problems in the context of the Digital Single Market. The Commission invites all stakeholders to back up their replies, whenever possible, with market data and other economic evidence.

\*

## Selection

Do you wish to respond to this questionnaire "Use of works, such as works of architecture or sculpture, made to be located permanently in public places (the 'panorama exception')?"

- Yes *(Please allow for a few moments while questions are loaded below)*
- No

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[1] Article 5(3)(h) of [Directive 2001/29/EC of the European Parliament and of the Council of 22 May 2001 on the harmonisation of certain aspects of copyright and related rights in the information society.](#)

[2] [COM\(2015\) 626 final.](#)

## Category of respondents

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Please choose the category that applies to your organisation and sector.

- Member State
- Public authority
- Owner or manager of works made to be located permanently in public places (or representative thereof)
- Library or Cultural heritage institution (or representative thereof)
- Educational or research institution (or representative thereof)
- End user/consumer/citizen (or representative thereof)
- Visual artist (e.g. painter, sculptor or representative thereof)
- Architect (or representative thereof)
- Professional photographer (or representative thereof)
- Other authors (or representative thereof)
- Collective management organisation (or representative thereof)
- Publisher (or representative thereof)
- Film/audiovisual producer (or representative thereof)
- Broadcaster (or representative thereof)
- Phonogram producer (or representative thereof)
- Performer (or representative thereof)
- Advertising service provider (or representative thereof)
- Content aggregator (e.g. news aggregators, images banks or representative thereof)
- Search engine (or representative thereof)
- Social network (or representative thereof)
- Hosting service provider (or representative thereof)
- Other service provider (or representative thereof)
- Other

## Questions

1. When uploading your images of works, such as works of architecture or sculpture, made to be located permanently in public places on the internet, have you faced problems related to the fact that such works were protected by copyright?

- Yes, often
- Yes, occasionally
- Hardly ever
- Never
- No opinion
- Not relevant

If so, please explain what problems and provide examples indicating in particular the Member State and the type of work concerned.

As the internet is a global medium, when using images of works of architecture or sculpture, even though in the country of residence there are no restrictions on such uses, possible consequences under other jurisdictions should also be taken into account.

2. When providing online access to images of works, such as works of architecture or sculpture, made to be located permanently in public places, have you faced problems related to the fact that such works were protected by copyright?

- Yes, often
- Yes, occasionally
- Hardly ever
- Never
- No opinion
- Not relevant

If so, please explain what problems and provide examples indicating in particular the Member State and the type of work concerned

See our response to Q7.

3. Have you been using images of works, such as works of architecture or sculpture, made to be located permanently in public places, in the context of your business/activity, such as publications, audiovisual works or advertising?

- Yes, on the basis of a licence
- Yes, on the basis of an exception
- Never
- Not relevant

If so, please explain, indicating in particular the Member State and what business/activity, and provide examples.

See our response to Q7.

4. Do you license/offer licences for the use of works, such as works of architecture or sculpture, made to be located permanently in public places?

- Yes
- No
- Not relevant

If so, please provide information about your licensing agreements (Member State, licensees, type of uses covered, revenues generated, etc.).

See our response to Q7.

5. What would be the impact on you/your activity of introducing an exception at the EU level covering non-commercial uses of works, such as works of architecture or sculpture, made to be located permanently in public places?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

See our response to Q7.

6. What would be the impact on you/your activity introducing an exception at the EU level covering both commercial and non-commercial uses of works, such as works of architecture or sculpture, made to be located permanently in public places?

- strong positive impact
- modest positive impact
- no impact
- modest negative impact
- strong negative impact
- no opinion

Please explain

See our response to Q7.

7. Is there any other issue that should be considered as regards the 'panorama exception' and the copyright framework applicable to the use of works, such as works of architecture or sculpture, made to be permanently located in public places?

- Yes
- No

If so, please explain and whenever possible, please back up your replies with market data and other economic evidence.

The current situation regarding the freedom of panorama exceptions is different in the EU Member States ranging from no exceptions at all, such as for example in Greece, which has a large amount of works in public spaces including national heritage monuments, until broad exceptions covering commercial and non-commercial uses, such as for example Austria.

In our view, there should be no exception of panorama freedom with reference to images of works that are in public spaces in any EU country, except perhaps for their use for commercial purposes. We believe that the notion of “public space” as communicative space of the citizens should prevail the Digital Single Market commercial rationale, therefore the Digital Single Market *modus operandi* should not interfere with the citizens’ right to access culture and cultural heritage. Public space should be treated the same as public domain and sharing of images of works that are situated in public spaces should not be subject to exceptions either offline or online. In addition, common legislation covering all the EU Member States would be for the benefit of the citizens, as it would also prevent them from facing legal consequences from sharing works in another country than the country of residence.

Exceptions of the freedom of panorama could also have a severe effect in the domain of education, including higher education and research institutions, in the sense of restricting the possibility to use images of works in public spaces for educational purposes, either in class or in educational material such as in module readers, research papers and academic books.

Sharing culture is a form of human expression and a human right. EU should facilitate the citizens’ access to their culture and cultural heritage without forcing them to provide financial compensation in order to share their culture. There are enough limitations with regards to access to archival material in the domain of culture, and the restriction of cultural in works in public places would only be an additional issue in the citizens’ experience of their history and culture.

## Submission of questionnaire

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End of survey. Please submit your contribution below.

### Useful links

[Webtext EN \(https://ec.europa.eu/digital-agenda/news-redirect/29674\)](https://ec.europa.eu/digital-agenda/news-redirect/29674)

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## **Background Documents**

[Privacy Statement DE \(/eusurvey/files/08c163a2-8983-4d3b-ae3e-21f69b5957cd\)](/eusurvey/files/08c163a2-8983-4d3b-ae3e-21f69b5957cd)

[Privacy Statement EN \(/eusurvey/files/217d6300-2bbe-4a51-aba4-0371c246dc9d\)](/eusurvey/files/217d6300-2bbe-4a51-aba4-0371c246dc9d)

[Privacy Statement FR \(/eusurvey/files/43cedbae-8123-4596-94ce-b526019329e5\)](/eusurvey/files/43cedbae-8123-4596-94ce-b526019329e5)

[Webtext DE \(/eusurvey/files/3abc4c0f-c0e6-4ece-99a3-2bebbba8c65d3\)](/eusurvey/files/3abc4c0f-c0e6-4ece-99a3-2bebbba8c65d3)

[Webtext FR \(/eusurvey/files/df02a573-838f-45e7-912d-8231ee8cdbcdd\)](/eusurvey/files/df02a573-838f-45e7-912d-8231ee8cdbcdd)

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## **Contact**

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