

Reply to the Call for Evidence on the AI Strategy for the Cultural and Creative Sectors

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Introduction

Pearle*-Live Performance Europe welcomes the European Commission's initiative to develop a dedicated Strategy on Artificial Intelligence for the Cultural and Creative Sectors.

Pearle* is the European federation representing over 13,000 organisations and companies in the music, performing arts and live performance sectors. As a European employers' association, Pearle* also participates in European sectoral social dialogue.

Artificial intelligence is increasingly becoming part of the environment in which cultural organisations create, produce, communicate, organise their activities and engage with audiences. Pearle* therefore welcomes the Commission's intention to develop a strategic approach that enables the cultural and creative sectors to benefit from AI while respecting the existing European legal framework and maintaining human creativity and professional expertise at the centre of cultural activity.

The future strategy should above all help cultural organisations understand how AI can be used in practice, develop the skills and capacities needed to make responsible choices, and access the expertise, tools and cooperation opportunities required in a rapidly evolving technological environment.

Pearle* would also emphasise that AI can offer opportunities for performing arts professionals, provided that intellectual property considerations are appropriately addressed.

Comments

1) Harness the potential of AI for audiences, accessibility and communication

AI can provide cultural organisations with new tools to reach and engage audiences. For communication and marketing departments, it can support audience analysis, multilingual communication, the preparation and adaptation of content, and more targeted communication strategies. Generative AI is also changing the way people search for information online, meaning that performing arts organisations increasingly need to consider not only their visibility on traditional search engines and social media, but also how their activities and cultural offer are represented in AI-generated responses. This creates new opportunities to reach audiences, while also requiring organisations to understand how these emerging communication channels function and how cultural content can remain visible and discoverable.

This is particularly relevant for organisations working in smaller cultural markets, peripheral regions and smaller linguistic communities. Access to technology, expertise, relevant datasets and affordable tools may be more limited, while cultural content in less widely spoken European languages may also be less visible in AI systems and digital discovery. The future strategy should therefore ensure that the development and uptake of **AI supports, rather than weakens, Europe's cultural and linguistic diversity, pluralism and artistic expression, including the visibility of less commercially prominent cultural work.**

AI can also contribute significantly to accessibility. Tools for subtitling, translation, speech-to-text and text-to-speech services, audio description and other forms of adaptation can help make performances and cultural content more accessible, including for persons with disabilities and audiences with specific accessibility needs. Pearle* nevertheless stresses that improving accessibility requires continued investment in human skills and expertise. **AI-based tools should complement, rather than replace, professional expertise, particularly where language, context, artistic meaning and the audience experience require nuanced human judgement,** and should not be regarded as sufficient in themselves to ensure that performing arts venues are accessible and welcoming to all. Pearle* therefore encourages the Commission to support the development and testing of AI-based tools for audience engagement, communication and accessibility, as well as the exchange of practical experience between cultural organisations.

2) Use AI to preserve and activate cultural knowledge and professional expertise

The management and use of cultural archives is another area where AI can offer important opportunities. Performing arts organisations often hold extensive collections of recordings, scores, photographs, programmes, technical documentation and production materials accumulated over many years. **AI tools can help classify, search, analyse and connect these resources,** making them easier to access and use for artistic creation, research, education, rehearsal and the transmission of knowledge. Better organised archives can also allow existing materials to inform new artistic work and help professionals and students access knowledge, practices and expertise that might otherwise remain difficult to retrieve.

AI and related digital technologies can also facilitate cooperation between professional communities. Theatre and event technicians, musicians, dramaturgs, choreographers, stage directors, producers and other professionals can benefit from environments that allow them to share information, exchange knowledge and experiment collectively with new applications relevant to their respective fields.

The strategy should therefore **support collaborative platforms, knowledge centres and professional networks** that strengthen knowledge-sharing and help cultural professionals develop practical uses of AI.

3) Invest in education, skills and the transmission of professional know-how

The ability of the cultural and creative sectors to benefit from AI will depend largely on skills. The focus should be on **AI augmentation rather than substitution:** AI can complement human skills and extend professional capabilities, rather than replacement of human labour. Used in this way, AI can help professionals focus on tasks requiring creativity, critical thinking, contextual understanding and interpersonal skills, while preserving meaningful human involvement and supporting higher-quality work.

Relevant education and training pathways should therefore include AI literacy, covering not only the use of AI tools but also their ethical, legal and professional implications and the broader changes AI may bring to jobs and professional roles. This should also include the ability to assess **when AI is an appropriate tool, when human expertise should remain central, and how to critically evaluate the reliability, limitations and potential biases of AI-generated outputs**. Particular attention should be given to young people entering cultural professions, who need to learn how to work responsibly with AI while continuing to acquire the professional knowledge, practical experience and occupational know-how that underpin their respective fields.

At the same time, the introduction of AI should not weaken the transmission of specialist knowledge between generations. Education, workplace learning and continuing professional development should combine AI literacy with the preservation and development of the human expertise on which the performing arts depend. Accessible upskilling opportunities are also essential for professionals already active in the sector.

The AI transition should also be considered in terms of its impact on jobs, professional tasks, working conditions and the distribution of opportunities within the cultural sector. **Social partners and professional organisations should be involved in monitoring these developments** and in identifying appropriate approaches to human oversight, responsible use of AI in the workplace and fair transitions as professional roles evolve.

Pearle* therefore recommends that the strategy **support sector-specific training developed in cooperation with professional organisations, education and training providers and social partners**.

4) Build capacity and enable European and cross-sectoral cooperation

Many cultural organisations, particularly SMEs and smaller non-profit organisations, do not have dedicated AI, IT or legal expertise, and may face difficulties accessing funding, technological resources, high-quality data and specialised knowledge. These challenges may be particularly acute for organisations operating in smaller cultural markets, peripheral regions and smaller linguistic communities. The strategy should therefore provide **practical capacity-building opportunities, including access to knowledge centres, hubs or similar support structures** offering independent advice, practical guidance and opportunities to test technologies before committing significant financial or organisational resources. These structures could also help organisations assess which tools are genuinely useful for their activities and better understand their implications.

Such capacity-building support should also include information on the environmental and energy implications of different AI applications. As cultural organisations are increasingly expected to make their operations more sustainable, they should have access to understandable and, where possible, comparable information on the environmental footprint of AI tools, enabling them to make proportionate and responsible choices.

Some of the most immediate benefits of AI for cultural organisations may also lie in practical organisational uses rather than artistic production itself. Applications in **planning and scheduling, technical documentation, resource management, archive and data analysis and**

administrative workflows can help reduce administrative pressure and enable organisations to devote more time and resources to their core artistic and cultural activities.

Added value can be given at the European level by facilitating cooperation across the cultural and creative sectors and with technology, education and research. EU funding programmes, including **Creative Europe, Digital Europe, Erasmus+, Horizon Europe and the future AgoraEU programme**, as well as other relevant instruments, should support this cooperation and enable cultural organisations not only to acquire technological tools, but also to participate in their development, test applications, develop common approaches and share knowledge across borders.

5) Prioritise implementation, transparency and legal certainty

The future strategy should operate coherently with the existing EU legal framework, including the AI Act, copyright and related rights legislation and, where relevant, the Digital Services Act and Digital Markets Act. Pearle* considers that the priority should be **effective implementation and clear guidance, with particular attention to transparency and legal certainty**. Cultural organisations, professionals and audiences should have appropriate information about the use of AI where required under existing legislation, while organisations themselves need clear guidance on their responsibilities when using AI systems.

The development and use of generative AI should also **respect creative authorship and the rights of artists and other creative professionals**. This includes not only copyright and related rights, but also relevant performers' rights and rights concerning the use of a person's image, voice or likeness. Where protected works or performances are used for AI training or other commercial purposes, rightsholders should have meaningful transparency and effective means of exercising their rights, including streaming platforms, or other digital platforms and tech companies. The Commission should continue examining practical approaches to issues such as transparency and labelling, effective exercise of rights, licensing and remuneration models, while first assessing the extent to which these issues are already addressed by legislation and whether additional measures are necessary, proportionate and workable across different cultural and creative subsectors. Where voluntary licensing or other market-based solutions are explored, their practical functioning and impact on all actors in the cultural value chain should be carefully assessed. In particular, the strategy should **avoid creating new or duplicative obligations for legitimate rights users, including performing arts organisations**. For SMEs and cultural organisations with limited administrative and legal capacity, the emphasis should remain on clarity, implementation and practical guidance rather than additional layers of compliance.

6) Explore how AI can support enforcement in the digital environment

AI-based tools may also offer practical benefits for the implementation and enforcement of existing rules. For the live performance sector, a particularly relevant example is the **unauthorised streaming of live events**, where infringements can cause significant harm because the economic value of live content is often concentrated in a very short period around the performance itself. Pearle* follows this issue and has highlighted online piracy of live events as an important challenge in its wider work on digital and consumer policy.

AI-based technologies may help **identify unauthorised streams, detect infringements more rapidly and support monitoring and enforcement processes**. The strategy could therefore encourage cooperation between cultural organisations, rightsholders, platforms and

technology providers to explore such applications within the existing copyright and platform regulatory framework. Similar considerations may arise where AI is used in recommendation systems, personalised marketing or ticketing, where **coherence with existing consumer, platform and competition rules should remain the priority rather than the creation of parallel sector-specific obligations.**

7) Ensure and support safe and responsible AI use in the cultural and creative sectors

Particular attention should be paid to AI applications in the cultural and creative sectors that may have significant implications for physical safety, fundamental rights or working conditions. Depending on their intended purpose and the circumstances in which they are deployed, some such systems may **qualify as high-risk AI systems under the EU AI Act**. The AI Act should therefore remain the principal framework for determining applicable obligations, and the forthcoming AI Strategy for the Cultural and Creative Sectors should **avoid creating conflicting or overlapping requirements.**

Where AI is used in safety-critical contexts, **meaningful human oversight and appropriate professional expertise remain essential**, particularly where errors or system failures could have serious consequences. For AI systems classified as high-risk under the AI Act, human oversight is already **a specific regulatory requirement.**

Examples of AI applications that may raise particular safety or fundamental-rights considerations in the live performance sector as these technologies develop include:

- **Automated stage control:** AI systems used to control lifting platforms, stage machinery or other technical equipment, particularly where malfunction or incorrect operation could cause harm to workers, performers or audiences.
- **Intelligent rigging:** AI systems used to monitor loads, suspension systems and rigging operations, where incorrect assessments could compromise structural or personal safety.
- **Autonomous drones at cultural events:** AI-enabled systems used to navigate drones in or around performance spaces and audiences, with potential implications for physical safety and privacy.
- **Biometric systems for access control:** AI-based biometric systems used in connection with visitor or staff access, where their use may raise privacy, data-protection or fundamental-rights considerations depending on the type and purpose of the biometric processing involved.
- **AI-supported crowd management and evacuation:** AI systems used to analyse crowd flows or support decisions concerning access routes, entrances, exits or evacuation procedures, where inaccurate outputs could have serious safety consequences.

Pearle* therefore recommends **sector-specific support to help cultural organisations and companies navigate the AI transition, understand the applicable regulatory framework and assess the risks associated with different applications.** Such support should enable the sector to harness the potential of AI while ensuring appropriate human oversight, professional competence and accountability where **their use may affect safety, fundamental rights or working conditions.**

Conclusion

In conclusion, Pearle* considers that the future AI Strategy for the Cultural and Creative Sectors should enable cultural organisations and professionals to participate actively and responsibly in the AI transition. For the live performance sector, this means supporting the use of AI to improve audience engagement, accessibility and communication; enabling better management and use of archives and cultural knowledge; facilitating cooperation and knowledge-sharing between professionals; investing in education, AI literacy and professional skills; and providing organisations with practical capacity-building, advice and access to tools. At European level, the strategy should also facilitate cross-sectoral cooperation and ensure that relevant funding opportunities are accessible to cultural organisations of different sizes and structures. It should also support Europe's cultural and linguistic diversity, help professionals and organisations adapt fairly to changes in jobs and tasks, and enable informed and proportionate choices regarding the environmental and organisational impacts of AI.

At the same time, the Commission should focus on effective implementation of the existing EU legal framework, legal certainty and transparency, while avoiding unnecessary or duplicative obligations for performing arts organisations and other legitimate rights users. The strategy should respect creative authorship and relevant rights, while ensuring appropriate human oversight, professional competence and accountability where AI applications may affect safety, fundamental rights or working conditions. AI should ultimately remain a tool at the service of culture, supporting human creativity and professional expertise, augmenting rather than displacing human capabilities, strengthening the capacity of cultural organisations to fulfil their missions and helping the cultural and creative sectors adapt to rapidly evolving technologies.