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| <p><b>Apply AI Strategy</b></p> <p><b>Response to call for evidence</b></p> |
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## **Introduction**

Pearle\*- Live Performance Europe is the European federation regrouping through its members over 13,000 organisations and companies in the music, performing arts and live event sectors.

Pearle\* welcomes the opportunity to contribute to the European Commission's consultation on the **Apply AI Strategy**. As the European federation representing the live performance sector, we support the Commission's aims for a responsible, trustworthy and value-protecting approach to artificial intelligence that acknowledges the diversity of needs across sectors, including culture.

The live performance sector is both a driver of creativity and an essential pillar of Europe's cultural and economic fabric. As AI technologies increasingly shape how content is created, produced, distributed and experienced, the Apply AI Strategy must recognise the specific challenges and opportunities for cultural enterprises, including artists, cultural operators, and live event professionals. Ensuring that the Culture and Creative Sector (CCS) is meaningfully included in the strategy will be key to fostering innovation while safeguarding artistic freedom, cultural diversity, and European values protecting creative content.

## **Comments**

- Since the **Apply AI Strategy** aims to accelerate the uptake of AI across strategic industrial sectors and public services, **Pearle\* stresses the importance of explicitly including the cultural and creative sectors (CCS) among the strategic verticals**. The live performance sector, as a key component of the CCS, plays a vital role in Europe's economy and cultural identity, employing millions and fostering innovation, education, and social cohesion. AI is already beginning to influence the sectors in areas such as stage production, creative content, audience engagement, ticketing and accessibility tools. However, this transformation brings both opportunities and challenges. **It is therefore essential that the strategy includes a dedicated focus on the impact of AI on the CCS. We need to consider the sectors' specific integration needs, ethical concerns, and potential risks to artistic freedom, European values on the protection of artistic creation, and cultural diversity.**

- **To effectively integrate the CCS as a strategic vertical, the strategy should begin with a comprehensive mapping of AI use cases and needs across the ecosystem. This should be followed by the development of targeted policy actions co-created with sectoral stakeholders.** Such actions could include pilot projects focused on AI applications in the CCS, the publication of sector-specific ethical guidance, the development of instruments against illegal ticketing selling and investment in experimentation hubs or ‘creative AI labs’—modelled after **AI factories**—designed to support innovation in artistic practice while ensuring that artists and cultural organisations remain active participants in shaping the technologies they use.
- Given that the **EU’s AI Act<sup>1</sup>** promotes trustworthy, human-centric AI, the Apply AI Strategy must also uphold and protect cultural values and artistic freedoms. **In the CCS, AI should complement—not replace—human creativity and expression. It must not lead to the dilution of authorship, the erosion of copyright protections and Intellectual Property, or the weakening of performers’ neighbouring rights in the context of GenAI.** Generative AI, in particular, raises pressing legal and ethical concerns regarding the use of creative content. These must be addressed proactively and transparently, in close consultation with CCS stakeholders. **Pearle\* therefore urges the Commission to integrate robust compliance and redress mechanisms into the strategy and to actively involve cultural stakeholders in their design and implementation.**
- The cultural and creative sectors are largely composed of SMEs and micro-organisations that often lack the financial and technical resources to access, deploy, or develop AI solutions. **The Apply AI Strategy should therefore prioritise accessible funding instruments, targeted support for innovation, and AI literacy training specifically tailored to the realities of CCS. This strategy should be developed alongside the upcoming Culture Compass and applied alongside the next Multiannual Financial Framework.** This will help ensure equitable participation in the digital transition and avoid widening gaps between sectors or within the CCS itself.
- **Finally, AI adoption in the CCS must be closely monitored, with particular attention to its impacts on the work environment.** As AI technologies reshape workflows, they are likely to introduce new forms of artistic and other labour and transform existing job profiles within the sectors. Reskilling and upskilling will become increasingly necessary and should be addressed through dedicated programmes that reflect the specific characteristics of artistic professions. **Pearle\* emphasises the need for the strategy’s monitoring of developments in skills needs, in line with the Union of Skills policy goals.** This will be essential to ensure that policy responses remain relevant, inclusive, and supportive of both innovation and the long-term sustainability of creative work in Europe.

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<sup>1</sup> [Regulation \(EU\) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations \(EC\) No 300/2008, \(EU\) No 167/2013, \(EU\) No 168/2013, \(EU\) 2018/858, \(EU\) 2018/1139 and \(EU\) 2019/2144 and Directives 2014/90/EU, \(EU\) 2016/797 and \(EU\) 2020/1828 \(Artificial Intelligence Act\)](#)

## **Conclusion**

**Pearle\* urges the European Commission to ensure that the cultural and creative sectors are explicitly recognised as a strategic vertical in the Apply AI Strategy.** As AI technologies continue to reshape economies and societies, it is essential that the unique characteristics, vulnerabilities, and contributions of the CCS are fully acknowledged within the EU's overarching approach to AI deployment.

**To this end, the strategy must go beyond general objectives and include concrete, sector-specific measures that support responsible innovation while safeguarding protection for artistic content and cultural diversity.** This includes developing dedicated policy actions in close collaboration with CCS stakeholders, ensuring access to funding and training for smaller organisations and cultural professionals, and establishing strong legal and ethical safeguards, particularly in relation to generative AI and Intellectual Property.

**The strategy must also be implemented in alignment with broader EU cultural policy frameworks, such as the forthcoming Culture Compass, and backed by adequate resources under the next Multiannual Financial Framework.** Furthermore, robust monitoring and enforcement mechanisms will be key to ensuring that the digital transition serves the public interest and respects the rights of creators.

Pearle\* stands ready to support the Commission in further shaping this strategy and ensuring that AI contributes to a vibrant, diverse, and sustainable cultural landscape in Europe.