

Creative Europe 2021-2027 Interim Evaluation and Creative Europe 2014-2020 Final Evaluation - Public consultation questionnaire

Fields marked with * are mandatory.

Introduction

The European Commission invites you to take part in a public consultation aimed at gathering views on the results of previous and the current edition of the [Creative Europe programme](#)

The Creative Europe programme is operationalised through three main sub-programme / strands: Culture, MEDIA and Cross-sectoral.

Why this consultation?

A combined evaluation of [Creative Europe 2021-2027](#) and its predecessor programme is currently being undertaken for the European Commission.

The views expressed in this consultation will feed into this combined evaluation.

Who is invited to contribute to this consultation?

All citizens, organisations and public authorities are encouraged to respond to this consultation. In particular, the consultation seeks to gather views from individual citizens, in their personal or professional capacity; research, academia, as well as civil society organisations working on issues connected to the cultural and creative sectors; social partners, Creative Europe beneficiary organisations, and public authorities at national, regional and local levels.

Please submit your responses via this online questionnaire.

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch

- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Sebastiano

* Surname

Bertagni

* Email (this won't be published)

sb@acte.be

* Organisation name

255 character(s) maximum

Association of Commercial Television and Video on Demand Services in Europe

* Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

* Annual turnover of your organisation

- ☒ Less than 2 million EUR
- ☐ Less than 10 million EUR
- ☐ Less than 50 million EUR
- ☐ More than 50 million EUR

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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|-------------------------------------|--------------------------------|-------------------------------------|-------------------------------------------------|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |

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| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
| <input checked="" type="radio"/> Belgium | <input type="radio"/> Germany | <input type="radio"/> Montenegro | <input type="radio"/> Spain |
| <input type="radio"/> Belize | <input type="radio"/> Ghana | <input type="radio"/> Montserrat | <input type="radio"/> Sri Lanka |
| <input type="radio"/> Benin | <input type="radio"/> Gibraltar | <input type="radio"/> Morocco | <input type="radio"/> Sudan |
| <input type="radio"/> Bermuda | <input type="radio"/> Greece | <input type="radio"/> Mozambique | <input type="radio"/> Suriname |
| <input type="radio"/> Bhutan | <input type="radio"/> Greenland | <input type="radio"/> Myanmar/Burma | <input type="radio"/> Svalbard and Jan Mayen |
| <input type="radio"/> Bolivia | <input type="radio"/> Grenada | <input type="radio"/> Namibia | <input type="radio"/> Sweden |

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|------------------------------------|-------------------------------------|----------------------------|----------------------------|
| ○ Bonaire Saint Eustatius and Saba | ○ Guadeloupe | ○ Nauru | ○ Switzerland |
| ○ Bosnia and Herzegovina | ○ Guam | ○ Nepal | ○ Syria |
| ○ Botswana | ○ Guatemala | ○ Netherlands | ○ Taiwan |
| ○ Bouvet Island | ○ Guernsey | ○ New Caledonia | ○ Tajikistan |
| ○ Brazil | ○ Guinea | ○ New Zealand | ○ Tanzania |
| ○ British Indian Ocean Territory | ○ Guinea-Bissau | ○ Nicaragua | ○ Thailand |
| ○ British Virgin Islands | ○ Guyana | ○ Niger | ○ The Gambia |
| ○ Brunei | ○ Haiti | ○ Nigeria | ○ Timor-Leste |
| ○ Bulgaria | ○ Heard Island and McDonald Islands | ○ Niue | ○ Togo |
| ○ Burkina Faso | ○ Honduras | ○ Norfolk Island | ○ Tokelau |
| ○ Burundi | ○ Hong Kong | ○ Northern Mariana Islands | ○ Tonga |
| ○ Cambodia | ○ Hungary | ○ North Korea | ○ Trinidad and Tobago |
| ○ Cameroon | ○ Iceland | ○ North Macedonia | ○ Tunisia |
| ○ Canada | ○ India | ○ Norway | ○ Türkiye |
| ○ Cape Verde | ○ Indonesia | ○ Oman | ○ Turkmenistan |
| ○ Cayman Islands | ○ Iran | ○ Pakistan | ○ Turks and Caicos Islands |
| ○ Central African Republic | ○ Iraq | ○ Palau | ○ Tuvalu |
| ○ Chad | ○ Ireland | ○ Palestine | ○ Uganda |
| ○ Chile | ○ Isle of Man | ○ Panama | ○ Ukraine |
| ○ China | ○ Israel | ○ Papua New Guinea | ○ United Arab Emirates |
| ○ Christmas Island | ○ Italy | ○ Paraguay | ○ United Kingdom |
| ○ Clipperton | ○ Jamaica | ○ Peru | ○ United States |

- | | | | |
|--------------------------------------------------------|----------------------------------|--------------------------------------------------------------------|------------------------------------------------------------|
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena, Ascension and Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

* Please indicate what sector(s) you operate in:

- | | |
|-----------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Architecture | <input checked="" type="checkbox"/> TV and online production |
| <input type="checkbox"/> Artistic crafts | <input checked="" type="checkbox"/> Distribution of audio-visual works |
| <input type="checkbox"/> Cultural heritage | <input type="checkbox"/> Film festivals |
| <input type="checkbox"/> Design & fashion | <input type="checkbox"/> Video games development |
| <input type="checkbox"/> Literature, books and publishing | <input type="checkbox"/> Multimedia |
| <input type="checkbox"/> Music | <input checked="" type="checkbox"/> VOD platform |
| <input type="checkbox"/> Performing arts | <input type="checkbox"/> Access to markets |
| <input type="checkbox"/> Radio | <input type="checkbox"/> Training provision |
| <input checked="" type="checkbox"/> Film production | <input type="checkbox"/> Other |

Which editions of the Creative Europe do you have the most experience with?

- ☐ Creative Europe 2014-2020
- ☒ Creative Europe 2021-2027

☐ Neither

* Which sub-programme / strand of Creative Europe do you have the most experience with?

- ☐ Culture
- ☒ Media
- ☐ Cross-sectoral

Within what capacity are you responding to this survey?

- ☐ I have applied and received co-funding under Creative Europe
- ☐ I have applied and not received co-funding under Creative Europe
- ☐ I work(ed) with organisations who applied and received co-funding under Creative Europe
- ☒ I work/have worked with Creative Europe at a policy level
- ☐ I work/have worked with Creative Europe at a research level
- ☐ I have an interest in European cultural and creative works but have no direct link to Creative Europe
- ☐ Other, please elaborate:
- ☐ I don't wish to answer

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☒ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Effectiveness of the Creative Europe programme activities

How important is the [Culture/Media/Cross-sectoral sub-programme / strand] of Creative Europe to your organisation?

	Not important	Somewhat unimportant	Neither important nor unimportant	Somewhat important	Very important	Don't know
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

How important is it for you that programmes such as Creative Europe are supporting the creation and promotion of:

	Not important	Somewhat unimportant	Neither important nor unimportant	Somewhat important	Very important	Don't know
European films and TV series	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European music	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European architecture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European design	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European performing arts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European literature and publishers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European cultural heritage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European video games	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European news media	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

To what extent have Creative Europe activities been effective to date in achieving the following objectives?

	Not at all effective	Somewhat ineffective	Neither effective nor ineffective	Somewhat effective	Very effective	I don't know
* Safeguard, develop and promote European cultural and linguistic diversity and heritage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the competitiveness and the economic potential of the cultural and creative sectors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To enhance artistic and cultural cooperation at the European level in order to support the creation of European works	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Strengthen the economic, social and external dimension of and innovation and mobility in Europe's cultural and creative sectors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To promote competitiveness, scalability, cooperation, innovation and sustainability, including through mobility, in the European audiovisual sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To promote policy cooperation and innovative actions supporting all strands of the Programme	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* To promote a diverse, independent and pluralistic media environment, and media literacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Fostering freedom of artistic expression, intercultural dialogue and social inclusion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

To what extent have the following factors impacted on the implementation of the Creative Europe activities:

	No impact	Very little impact	Little impact	Moderate impact	High impact	Don't know
Covid-19 pandemic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Withdrawal of the United Kingdom from the European Union (Brexit)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Aggression against Ukraine by the Russian Federation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please highlight any other factors that have affected the effectiveness of Creative Europe, including national factors, by providing examples:

To what extent is the Creative Europe programme visible for citizens, artists and operators in the audiovisual and cultural and creative sectors?

	Not visible	Somewhat invisible	Neither visible nor invisible	Somewhat visible	Very visible	Don't know
*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Relevance and coherence of the Creative Europe programme activities

To what extent has the Creative Europe programme been relevant to the needs of artists and operators in the audiovisual and cultural and creative sectors?

	Not relevant	Somewhat irrelevant	Neither relevant nor irrelevant	Somewhat relevant	Very relevant	Don't know
*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

To what extent were the priorities under the Creative Europe's MEDIA sub-programme/strand relevant to the challenges and needs of the audiovisual and cultural and creative sector in your country?

	Not relevant	Somewhat irrelevant	Neither relevant nor irrelevant	Somewhat relevant	Very relevant	Don't know

Strengthening the competitiveness of the European audiovisual sector						
Acquisition of skills and competencies by audio-visual professionals						
Knowledge sharing and networking among audio-visual professionals						
Audience development in the audio-visual sector						
Support the emergence of new business models						
Promote capacity building in the audio-visual sector						
Enhance the visibility and promote the circulation of European audiovisual works at EU level and beyond						
Improve the competitiveness of the European video games industry						

To what extent has the Creative Europe programme been complementary with other EU interventions/initiatives aimed at supporting the Audiovisual and culture creative sectors?

	Not complementary	Somewhat contrasting	Neither complementary nor contrasting	Somewhat complementary	Very complementary	Don't know
*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

To what extent have Creative Europe programme activities proved complementary to other Member States' interventions /initiatives in the Audiovisual and culture and creative sector?

	Not complementary	Somewhat contrasting	Neither complementary nor contrasting	Somewhat complementary	Very complementary	Don't know
*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

EU added value of the Creative Europe programme activities

In your opinion, what does the Creative Europe programme offer in addition to other culture and audiovisual sector support schemes available at both international and national levels?

In your opinion, did the Creative Europe programme provide added value in terms of the following:

	To a very large extent	To a large extent	To some extent	To a little extent	To no extent	I don't know
Transnational character of actions and activities, which complement regional, national, international and other Union programmes and policies.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting European common roots and cultural diversity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting cross-border cooperation, including through mobility, among organisations and professionals in the cultural and creative sectors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Address common challenges, including the digital shift, via cooperation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote access to culture, active engagement of citizens and intercultural dialogue	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fostering economies of scale and growth and jobs in the Audiovisual and cultural creative sector,	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fostering additional funding opportunities for the Audiovisual and cultural creative sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing a more level playing field through actions that promote the participation of countries with different audiovisual capacities and strengthens collaboration between those countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Access and active participation of people with disabilities, people belonging to minorities and people belonging to socially marginalised groups in the cultural and creative sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foster gender equality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Future of the Creative Europe programme

* In your opinion, are there areas of the Creative Europe programme that should be reviewed and/or improved for the next iteration of the programme (due in 2027)?

- ☒ Yes
- ☐ No
- ☐ Don't know

Please explain your response, including by providing examples:

The Creative Europe programme complements the Audiovisual Media Services Directive (AVMSD) by supporting the creation, promotion, access to and dissemination of European audiovisual works within the EU and beyond. The programme has a commendable track record at supporting European production.

However, we believe that the programme suffers from overly rigorous definitions that are not aligned with national rules and the AVMSD, particularly regarding the definition of independent production. Specifically, the 25 and 50% direct/indirect ownership/equity links are problematic.

Numerous affiliated producers are not able to meet the eligibility criteria because of their links with AVMS providers. This definition, focused on ownership/equity links with AVMS providers, does not necessarily promote pluralism and diversity within audiovisual media services offerings. It may disproportionately reinforce the negotiating power of certain categories of certain kinds of independent producers while overlooking the crucial role that broadcasters and producers connected with other parts of the audiovisual sector play in the production of content.

Any approach should be wary of potential competitive effects on the market via measures that could be construed as both unjustified and discriminatory. According to the Council of Europe's European Audiovisual Observatory, commercial broadcasters produce indirectly over 58% of hours (32% of titles) and directly 27% of hours (16% of titles) .

The current approach can arbitrarily exclude a significant part of the audiovisual market. It can sideline actors that contribute to freedom of expression, diversity, creativity and democracy whilst complying with strict AVMS obligations without necessarily being able to access funding similar players are able to tap into.

To truly foster cultural diversity and creativity in the European audiovisual sector, the programme should adopt a more flexible and inclusive approach. It should recognise that each project may have unique features and allow for the creation of commercial terms that suit these specificities without sacrificing access to essential funding. This would encourage collaboration and support a vibrant, diverse European audiovisual ecosystem.

* In your opinion, are there cultural and creative sectors that are currently not properly covered and/or reached out and for which a specific focus should be included for the next iteration of the programme (due in 2027)?

- ☐ Yes
- ☐ No
- ☒ Don't know

Are there key challenges or opportunities facing the Audiovisual and cultural creative sectors that any future Creative Europe programme should aim to address which the current programme doesn't?

- ☒ Yes
- ☐ No
- ☐ Don't know

Please explain your response, including by providing examples:

The European AV ecosystem is the envy of the world. Producing the highest quality films and TV shows that speak to and reflect the diverse experience of European audiences and citizens. The quality of our AV output directly reflects the diversity of the stakeholders that contribute to the production process: creatively, strategically and financially. This crucially includes broadcasters and their own production studios.

A key challenge for the Media Programme is to resist efforts from certain stakeholders to further exclude broadcasters from accessing national and European funds and to prevent them from being classified as independent producers. The Programme should avoid overly narrow approaches that may conflict with the open concept of independent production in the AVMSD and the variety of national approaches that arise from it.

An opportunity for the next Media Programme would be to embrace a more inclusive approach that aligns with existing market realities and legal frameworks (AVMSD), thereby avoiding potential competitive distortions. Such an approach would encourage diverse stakeholders to collaborate more freely across borders, supporting a vibrant and inclusive AV ecosystem that reflects Europe's cultural richness.

The programme should acknowledge that the production of audiovisual content involves creative, strategic, and financial participation from a diverse range of different players, from small independent producers to large production studios, producers connected to other parts of the audiovisual sector, broadcasters, and distributors.

By adopting a more open and balanced approach, the Creative Europe programme can better support the full spectrum of the European audiovisual sector, fostering innovation, creativity, and cultural diversity while strengthening Europe's competitive position in the global market.

