



Ms Emmanuelle du Chalard

Head of Unit I.2. 'Copyright'

Directorate-General for Communications Networks, Content and Technology
European Commission

Ms Irene Roche Laguna

Head of Unit F.1. 'Coordination and Regulatory Compliance'

Directorate-General for Communications Networks, Content and Technology
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Mr Radek Maly

Head of Unit E.3 'Notification of Regulatory Barriers'

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
European Commission

Brussels, 3rd of February 2025

Dear Ms du Chalard,
Dear Ms Roche Laguna,
Dear Mr Maly,

We, the [Live Content Coalition](#), wish to address the concerns raised by the Computer and Communication Industry Association in the letter sent to you on 21 January 2025 regarding the recent Italian Piracy Shield and amendments to copyright law. It is becoming increasingly clear that platform representatives like CCIA are seeking to undermine not only efforts to deal with harmful content but also the fight against illegal content, including live piracy. As representatives of leading European live content producers, broadcasters and exhibitors, including sports, music concerts and festivals, broadcast television and video on demand services, we are all united in the fight to stop piracy and would ask the Commission to stand firm and resist these efforts to undermine this critical task.

The recent law enacted by the Italian government provides a robust framework to swiftly address piracy, particularly for live broadcasts, which are exceptionally vulnerable due to their real-time nature. The **Piracy Shield platform** provides a vital framework for addressing piracy with unprecedented speed, especially for live broadcasts. Its automated process enables immediate IP address and Fully Qualified Domain Name blocks, effectively disrupting unauthorized retransmissions. Since its launch in February 2024, certain operators involved in accessing online content have been required to block DNS and IP resolution of pirate domains submitted on the Piracy Shield platform. However, to date, only the Italian ISPs have complied, leaving other services to be used to circumvent the block. The reason why CCIA is vocal on this issue is because in October 2024, amendments were approved by the Italian Parliament to strengthen the anti-piracy law. Specifically, this includes increasing the blocking capacity of ISPs starting from February 2025 and extending the blocks to websites and services with a "predominant" focus on piracy, not just those with "exclusive" illegal content. Other operators, such as search engines (e.g., Google), are also required to comply with the law by delisting infringing posts within 30 minutes. Additionally, service providers, including VPNs and open DNS providers, are now explicitly required to cooperate with law enforcement by reporting

any illegal activity on their infrastructures. This is a crucial element of the fight against piracy and one we hope to see made more widely available across the European Union. The obligations discussed above apply to several of CCIA's members because of the role they play as gateways to piracy. Whilst we can only applaud Italy's efforts, we fear that a lack of future-proof binding rules at European level will pave the way for pirate networks to rapidly adapt to new technology and bypass these efforts.

In under a year, the new system in Italy has proven to be an efficient one with tens of thousands of illicit streams subject to blocking. It should not be overshadowed by isolated instances of over-blocking, from which learnings are being taken to prevent further recurrence. As rightsowners, we have no interest in blocking legitimate content, whereas on the contrary, some online intermediaries profit from piracy.

The reluctance of intermediaries like **Cloudflare, Google, and X** to meet their obligations under the new laws remains a barrier to its effectiveness. **Cloudflare alone facilitates a substantial share of piracy through its anonymization services**, which make it impossible to identify and tackle pirate infrastructures/services operating behind the cloak of those services. Effectively, Cloudflare has become one of the main technical solutions for pirates to operate.

Piracy of live content continues to increase

A Grant Thornton (GT) analysis of November 2024, conducted for the Live Content Coalition, highlights the inefficiency of current EU legal measures. Despite the Commission's Recommendation on combating online piracy of sports and other live events (see GT findings in attachment to this letter), at least 5.3 million unauthorised retransmissions were detected in the first half of 2024. More than 80% of these were not suspended before the end of authorised transmissions. Most notices were submitted to Dedicated Server Providers (DSPs), of which only 12% were suspended.

Call for EU Binding Measures

The Italian measures underscore the urgent need for the European Commission to elevate its **Recommendation on combating online piracy of sports and other live events** into a **legally binding instrument**. Current voluntary approaches fall short in addressing the lack of cooperation by intermediaries and the evolving tactics of piracy networks.

The Live Content Coalition remains committed to advocating for robust anti-piracy measures across Europe and stands ready to collaborate with stakeholders to protect the industries we represent.

We are at your disposal for further discussions on this critical matter.



For more information, please contact:

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