Action Group on Digital & AI

Recommendations for the AI Strategy for the cultural and creative sectors

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Culture Action Europe & Michael Culture Association
Digital and AI Action Group
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The AI & Digital Action Group, facilitated by Culture Action Europe and Michael Culture Association, aims to understand and shape the impact of AI and the digital transformation on Europe's cultural and creative sectors (CCS). The group, composed of over 140 members of both organisations, has a strong trans-sectoral dimension, bringing together professionals from cultural institutions, cultural organisations and creative interlocutors. One of its primary goals is advocating for tailored EU digital and AI policies while considering the commonalities, diversities, and specificities of the CCS.

The Recommendations on the following pages incorporate the values, priorities, and vision of the Digital and AI Action Group for the upcoming AI Strategy for the cultural and creative sectors. These build upon the advocacy focuses outlined in the Action Group Mission Statement, the results of action surveys on digital and AI for the CCS, the earlier considerations of the Action Group for the Artificial Intelligence Act, and a series of dedicated Action Group meetings on the upcoming AI Strategy. The final Recommendations were drafted through a consultation process involving various CCS professionals, including cultural institutions, artists, and digital experts.

The Digital and AI Action Group is funded by the European Union. The views and opinions expressed in this document are however those of the authors only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor EACEA can be held responsible for them.

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Introduction

AI systems enable new opportunities in the cultural and creative sectors, including personalised experiences, innovative forms of cultural participation, and improved accessibility. This technology, including generative AI (GenAI) and large language models (LLMs), analyses unparalleled amounts of data while enabling new cultural environments, opportunities and personalisation. The cultural and creative sectors have long incorporated tools that use AI systems into their workflows to streamline and improve their work. The Apply AI strategy (2025) outlines some of the technical benefits that such technology can produce. This position paper is rooted in the conviction that the term "AI (system)" is to be understood in a larger sense than the simplifications often seen in general discourse. From this perspective, AI has proven a valuable asset to the CCS.

At the same time, **AI systems represent unprecedented threats to human creativity and the working conditions of the cultural and creative sectors**. AI systems are co-constructed through the embodied knowledge, cultural contexts, and biases of human creators and the data used to train them. The current development, uptake, and governance of AI systems represent threats to artistic freedom, cultural and creative rights, cultural diversity, and European values across existing legal and financial frameworks. Moreover, new ethical dilemmas are set to present themselves as AI models and systems further mature, including for privacy, cultural autonomy, and prevailing notions of creativity. The rapidity of AI systems in completing tasks has created shockwaves in the CCS and led to job displacement and digital misuse, especially as a result of GenAI systems. This reasoning includes EU accession candidates and neighbouring countries where the CCS face equivalent pressures and where EU frameworks and programmes increasingly apply. These challenges represent existential threats to European creative, cultural, linguistic and territorial diversity, entrench inequalities and bias across the chain of provenance, and risk leaving communities behind.

For these reasons and more, **the Digital and AI Action Group welcomes the European Commission's proposal for an AI Strategy for the cultural and creative sectors**. Action to safeguard human creation, foster a digital environment shaped by and accountable to the cultural and creative sectors, and ensure robust, legal safeguards for artistic freedom and fair working conditions is urgent to address the demands and challenges of the sectors. We call for an AI Strategy addressing four key strategic priorities.

Firstly, **a human-first, transparent approach to AI based on cultural rights must be ensured**. Global approaches to AI are increasingly prioritising an innovation-first approach, promoting swift, large-scale development and uptake of AI systems in the pursuit of innovation irrespective of risks and potential violations of fundamental rights. The AI

Strategy should be developed with a human-first, rights-based approach embracing cultural rights.

Secondly, **human creativity and data resilience must be safeguarded in the Strategy**. AI models and systems are trained on vast datasets that include creative and cultural works, often without transparency regarding what has been collected, how it is used, or whether creators have given meaningful consent. It is vital that the Strategy addresses pressing questions around intellectual property, fair compensation, and the integrity of cultural production. Furthermore, without investment in European AI infrastructure and governance capacity, the CCS risk exacerbating dependencies on AI systems and platforms developed outside of Europe that often run counter to European values and regulatory frameworks.

Thirdly, **the CCS and cultural and creative workers must be equipped for the AI transition**. GenAI is used to perform tasks previously carried out by CCS professionals, from text and image production to translation and design. This creates pressure on employment across the sector, particularly for independent artists and creatives as well as smaller organisations with limited capacity to adapt. These challenges have concrete implications for the diversity, sustainability, and competitiveness of Europe's cultural and creative ecosystems, and require coordinated policy responses at the European level that enable the adoption of AI in the CCS while respecting the specificities and needs of each sector.

Lastly, **forward-thinking and collaborative approaches to AI in the CCS are essential for sustainable policies**. The CCS have historically been absent from the design, development and governance frameworks of AI systems. This absence reflects the structural misalignment between the growth-driven logic of AI development and the human-first, rights-based approach of the CCS. Co-creative governance structures, greater collaboration, strategic foresight, and investment in hybrid and interdisciplinary competencies are essential for successful adoption of AI in the CCS.

The following pages elaborate upon these priorities and provide specific, actionable recommendations to support their realisation. In each chapter, we raise the issue(s) at hand, present the added value of European action in these areas, and propose specific recommendations for action in the AI Strategy for the cultural and creative sectors. We hope our recommendations provide inspiration and constructive input for shaping the future of AI in the CCS in Europe. This document may be built upon in the future by the Digital & AI action group as our work develops and new insights and feedback emerge.

1. Shaping culture in the age of AI

A human-first, transparent approach to AI based on cultural rights

Problem Statement / What is the problem?

AI systems increasingly mediate cultural experiences, redefining the ways in which people create, discover, experience and engage with culture, including recommendation engines, curatorial algorithms and generative tools. Cultural rights, as enshrined in UDHR Art. 27, EU Charter Art. 13, and the UNESCO 2005 Convention, protect every person's right to participate in cultural life, to have their cultural identity recognised and respected, and to benefit from their own creative contributions. In the context of AI systems, these rights are under particular pressure. It is therefore a matter of agency to uphold cultural rights in the face of algorithmically-driven cultural experiences: AI systems, with specific regard to generative AI, provide content outputs *about* a culture often with *input* from that culture, which flattens diversity and risks reproducing colonial and globalised framings. Looking at data extraction and use for AI training, we see linguistic corpora that are under-represented, diverse cultural worldviews and value systems that are misrepresented or distorted, and indigenous knowledge systems that are often absent or extracted without consent.

Cultural rights lie at the heart of European values. One of the key directions of the Culture Compass is to strengthen European values and cultural rights, recognising our responsibility to uphold them. AI systems, as they become increasingly embedded in the production, mediation and curation of online and offline spaces, should be governed in ways that respect these values. A cultural rights-based approach to AI in the CCS would promote social cohesion, strengthen cultural resilience, and support cultural diversity. Not doing so risks leaving the rights of cultural and creative professionals in the hands of operators who have access to the most efficient data harvesting methods and the most powerful AI systems.

Proposed Solution / What is the added-value?

The European Commission should **prioritise a rights-based, transparent approach to AI building upon the principles of the AI Act and placing cultural rights at its core**, promoting AI in the CCS while prioritising the needs, rights, and well-being of all. Taking measures to address the AI and digital divide also represents an important step to enable greater access, benefits, and opportunities in the CCS for AI.

Many AI systems have been developed without taking into account cultural rights, treating cultural works and data as mere commodities to be extracted freely. Nevertheless,

a different form of governance for AI in the CCS is still possible, combining social justice, collective ownership, transparency, cultural rights and competitiveness logic to ensure a sustainable approach grounded in cultural values. Such AI systems could improve the discoverability of, and access to, minority cultures and languages, support the protection of cultural heritage from conflicts and natural disasters, and promote cultural access and participation for persons with disabilities. Data governance structures should also respect the CARE Principles for Indigenous Data Governance.

A balance should therefore be struck between evaluating the benefits of AI (without undermining the authenticity of human creativity) and cultural rights, data and privacy rights. The Strategy should recognise and support the benefits offered by AI systems for the CCS and creative processes, while grasping that the 'imperfect,' messy, and emotional aspects of human creativity are integral.

Recommendations

- **Place human creativity and cultural rights at the core of the Strategy**, including through enshrining human creation, artistic freedom, and human agency as core principles and commitments of the Quality Jobs Act and EU Artists Charter.
- Initiate the adoption of a Commission Communication to **add a "Cultural Right" into the six digital rights already included in the European Declaration on Digital Rights and Principles,** thereby protecting cultural rights online.
- **Enhance the transparency requirements for GPAI model training**, expanding upon the Transparency chapter of the GPAI Code of Practice to require robustness, veracity and accuracy of training data and a summary of steps taken for the diversity and representativeness of training models and data sampling. Mandatory data provenance standards for AI training pipelines in the CCS should also be incorporated, requiring a documented metadata trail covering the origins, transformations, and ownership of cultural data at each stage of its lifecycle.
- **Introduce indicators on cultural and linguistic diversity in AI training data-sets and cultural accessibility in AI systems**, including for persons with disabilities, people facing economic barriers, those without internet access and elderly users in the new EU cultural data hub, establishing indicators in close coordination with the CCS, social partners and organisations representing persons with disabilities.
- **Invest into the development of culturally and linguistically diverse data-sets**, representing a broad array of human experiences and backgrounds, under a dedicated structural component for culture in the European Competitiveness Fund, with specific attention to data related to under-represented racial and ethnic groups, LGBTQIA+ communities, persons with disabilities, people facing economic barriers, people without internet access, and elderly users.

- **Incorporate indicators for the CCS into the monitoring activities of the upcoming AI Observatory as a monitoring mechanism to safeguard cultural rights,** including on the cultural and linguistic diversity of the content used for training, proprietary data obtained via licensing, number of copyright-related complaints, and the human presence in AI training and adoption to ensure accuracy, coherence and ethical considerations.
- **Outline a European Cultural Data Provenance Infrastructure approach** (to be developed by the Commission Expert Group on Artificial Intelligence mentioned in chapter 4) setting open, interoperable standards and establishing mechanisms to record and enforce usage rights, including through blockchain-based smart contracts, specifying whether derivative works or modifications are permitted, the conditions under which works may be used for promotion or commercial purposes, and their time limitations.
- **Commit to the timely adoption and implementation of the Code of Practice on marking and labelling of AI-generated content,** ensuring the effective and robust marking and labelling of content, and to periodic reviews (Article 56) at least once every 24 months to ensure its continued adequacy and robustness.
- **Introduce a layered AI disclosure standard for creative works**, requiring that all publicly released works include a compact, machine-readable attribution indicating the degree and phase of AI involvement (e.g. fully AI-generated; AI-assisted in ideation only; AI used during specific production phases). Disclosure should be embedded via robust tamper-resistant technologies including metadata specifying permitted uses, promotional windows, and licensing conditions.

2. From extraction to collaboration

Safeguarding human creativity and data resilience

Problem Statement / What is the problem?

The current state of AI development and training is based on a dynamic of extraction, rather than collaboration: shifting this power imbalance requires a recognition of the importance of cultural data to develop AI systems and a consequent remuneration and partnership with creators and heritage guardians. Furthermore, European digital infrastructure is largely dependent upon external actors and third-party, for-profit AI systems. This creates risks for the exploitation of EU cultural data without oversight, consent or proper remuneration.

Artists must have the right to assert their creativity and authorship, as well as to participate in a sustainable, viable revenue model. **Cultural institutions managing data must be able to continue doing their work without suffering from the economic burden caused by data extraction from bots and crawlers.** AI systems may provide new avenues for human creativity, but they cannot be treated as a replacement. AI systems can support creatives and augment working processes, but should not substitute human-created content or replace creatives' critical, contextual, expressive intent and creative input. Access to high-quality, well curated, secure training and testing datasets is also necessary to develop accurate, diverse, controlled and representative AI models supporting cultural research, conservation, and heritage. The question of how Europe governs, protects and develops this cultural data is no longer separate from the question of European technological sovereignty. If Europe wants sovereign capacity in AI, it cannot neglect the ecosystem from which so much of the training value is extracted.

A proactive, strategic approach is needed to support cultural data sovereignty and data resilience, and effective data provenance in Europe. People must be allowed to decide when and how their creative output can be used, including for AI training, while retaining the right to fair remuneration for such use through clear, transparent and accessible processes. Digitised cultural heritage, even if most of the time outside the logic of copyright, should not represent a free endless extraction pool for AI development. The act of digitising, and keeping the digitised asset online, constitutes the fulfilment of both a public role for cultural heritage institutions as well as a human and infrastructural cost: this dual nature of heritage digitisation should be supported.

Proposed Solution / What is the added-value?

The quality, robustness, and trustworthiness of an AI system depend upon the diversity and quantity of data that the system has ingested and processed during training, validation, and testing phases. Cultural data is therefore a key pillar of the quality, relevance and representativeness of the technological outcome: by establishing a fair system for remuneration and recognition of ownership of cultural data, the European Union can create a virtuous ecosystem in which AI systems developed and deployed can better reflect the diversity and complexity of the world.

In this sense, culture should be recognised as a public good and a strategic priority, including for AI in the CCS. Building upon the principles of the Culture Compass and the "Europe for Culture - Culture for Europe" draft joint declaration, the CCS should be meaningfully involved and represented in AI development, uptake and governance processes. EU-wide data infrastructure, open-source tools, secure data access frameworks, and mainstreaming culture into ongoing EU digital and industrial priorities represent a step in the right direction to achieve these goals, including through ensuring meaningful access and opportunities for SMEs in the CCS.

Boosting European cultural sovereignty and data resilience would reduce the risk of security, privacy and data breaches relating to AI in the CCS. The common European data space for cultural heritage and the European collaborative Cloud for Cultural Heritage illustrate the added-value of European leadership in developing digital infrastructure that serves the public interest, supporting the creation and reuse of cultural data in the CCS.

Recommendations

- **Uphold the key principles of authorisation, remuneration, transparency** for cultural and creative professionals across EU cultural policies, including in the revision of the DSM Copyright Directive (Directive (EU) 2019/790), moving beyond the opt-out mechanisms outlined in Articles 3 and 4 towards more sustainable, fair approaches.
- **Prioritise equitable representation and remuneration for cultural and creative professionals**, including requiring explicit, verifiable consent for the use of intellectual property in training GPAI models.
- **Announce the revision of the General-Purpose AI Code of Practice, guidelines and templates**, treating them as living documents and building upon the recommendations of the European Parliament report on copyright and generative artificial intelligence (2025/2058(INI)) to promote more equitable cultural representation both in training and output phases, including through requiring developers to assess and report on the diversity and representativeness of training data across linguistic, geographic, racial, ethnic and cultural dimensions.

- **Establish a unified contribution and fair remuneration framework for cultural and creative professionals and heritage institutions**, requiring commercial GPAI developers above a defined model-scale threshold to contribute to a centrally administered fund through an AI levy, in line with the European Parliament's resolution on copyright and generative AI (2025/2058(INI)). Revenues collected through this mechanism should be redistributed across the full cultural ecosystem: to independent artists and creatives across the CCS through a dedicated support scheme in the AgoraEU programme, building upon Creative Europe's Media Freedom Rapid Response Mechanism, and to cultural heritage institutions to support their digitisation efforts, ensuring that both living creators and heritage guardians are recognised as essential contributors to the data foundations of AI development.
- **Prioritise values-driven, shared European alternatives to AI proprietary tools** under the European Competitiveness Fund to reduce European external dependencies.
- **Establish an accessible online tool that CCS professionals may use to detect and verify whether their creative works have been used without consent** to train AI models, to request their removal and to opt out from future AI model training.
- **Prioritise measures to protect individuals against the dissemination of manipulated and AI-generated digital image, audio or video content**, including artists' works, performances, and imitation of personal characteristics (deep fakes) without consent.
- **Heighten access for the CCS and cultural data spaces to AI factories and computing facilities**, including through specific calls targeting the CCS under the EuroHPC JU, while supporting new Data Labs for the CCS as part of the Data Union Strategy.

3. Preparing for what comes next

Equipping the CCS for the AI transition

Problem Statement / What is the problem?

The introduction of AI systems in the CCS often clashes with artistic integrity, human-first approaches, and European values. The widespread use of AI therefore presents multiple risks to accessibility, inclusion and diversity that must be addressed. Moreover, the CCS are facing a multiplicity of AI-driven challenges with evidence emerging across the sectors, including significant job displacement, loss of professional opportunities, income erosion, role degradation, homogenisation of cultural and creative works, and a shift in the perception of cultural and creative professionals.

The issues faced are structural and psychological, with cultural institutions, organisations and individuals facing transformations they are insufficiently equipped for. All this is pushed by narratives of inevitability, fear and uncertainty, which risk pressuring institutions and workers into uncritical adoption or reactionary refusal. By their nature, CCS are non-linear, reflective sectors and should retain the right to refuse or shape how and whether AI systems are integrated into their work on their own terms.

Proposed Solution / What is the added-value?

When approached deliberately and on the sector's own terms, **critical AI literacy and structured workforce transformation can generate real added value for the CCS**. Accessible, inclusive AI approaches for organisations and individuals should be promoted in the cultural and creative sectors, while respecting the diverse needs and challenges of each sector.

It is integral that citizens understand when and why to use AI critically, including through education and training. Greater digital literacy, critical AI literacy and accessibility are therefore of the utmost importance, including in education, training and upskilling, and AI capacity-building in the CCS. This would enable cultural workers to become co-designers of the technologies that affect them.

AI should be regarded as a fallible, complex resource and education on AI should adopt an ethics-led approach, stressing that AI is not neutral and prioritising understanding of process over output. Open discussions, workshops, and educational programmes are all essential for illustrating the supportive, collaborative potential of AI which cannot substitute human creativity. Artistic research and practices, which are too-often underacknowledged in policy-making discussions, can also contribute to this process.

Cultural institutions, such as museums and libraries, are uniquely positioned to extend this literacy outward to the general public, multiplying the societal value of investment in CCS workforce.

Recommendations

- **Launch an Open Method of Coordination (OMC) group on critical AI literacy and training for artists and workers in cultural and creative sectors**, including with a focus on AI literacy and ethics in cultural and arts education, to research and compile best practices across Member States and EU accession candidate countries, and with a specific chapter on practitioner-led critical AI literacy frameworks in the CCS building on existing practice-based models in cultural organisations and interdisciplinary practitioners across Europe.
- **Enshrine the right to not adopt AI as an explicit principle in the AI Strategy for CCS**, embracing an opt-in approach for right holders and content owners so that no cultural institution or worker faces penalties or pressure for choosing to not integrate AI systems.
- **Consult and account for the diverse needs and specificities of sectors across the cultural ecosystem through regular consultations**, including through discussions with the CCS through the upcoming EU Structured Dialogue.
- **Introduce a call for ethical AI and technology partnerships in the CCS** under **a dedicated structural component for culture** in the European Competitiveness Fund, to complement the Apply AI Strategy to foster greater collaborative spaces.
- **Prioritise AI and digital competencies for students and teachers in education**, including through the EU Academy, to foster more critical approaches to AI, biases, societal and economic implications and issues, including a focus on AI in the CCS.
- **Provide access to ethical, human-centred and responsible digital technologies for the CCS under a dedicated structural component for culture in the European Competitiveness Fund**, including through European Digital Innovation Hubs for the CCS, responding to emerging digital challenges, providing access to technical expertise for AI in the CCS, facilitating the exchange of best practices, and enhancing cultural accessibility.
- **Commission an EU-wide, sector-disaggregated impact assessment on related job displacement in the CCS**, including research into direct displacement and evolution of practices bringing erosion of economic value, and incorporate its findings into the Quality Jobs Roadmap and Union of Skills.

4. Listening, shaping, innovating together

Forward-thinking and collaborative approaches for AI in the CCS

Problem Statement / What is the problem?

Many of the issues outlined result from the historical absence of the CCS from the design, development and governance frameworks of AI systems. Nevertheless, the sector faces deep transformation due to this technology. The increasing adoption of AI systems is placing pressure on cultural and creative professionals across the cultural ecosystem, shifting demands for skills, educational competences, and infrastructure in the process. CCS find themselves outside the narrative driven by market developments, investment and growth and have different as well as specific needs in terms of technology.

This absence from the decision-making table reflects a deeper structural misalignment between the logic of AI development and the logic of the CCS: culture values slow, cumulative and human approaches, rooted in memory, identity and collective expression. When the dominant narrative around AI systems is produced entirely outside this logic, the sector risks internalising pressures that do not belong to it. Civil society organisations and working groups, such as the Action Group on Digital and AI by CAE and MCA, exist also to foster this type of dialogue and to channel the needs of the sector: political dialogue often lacks a systematic and iterative listening for these representation groups.

The sector is therefore confronting the rise of AI systems from a position of accumulated fragility and without the concrete chance to help steering the conversation towards human-centred and ecocentric futures. New technologies, AI models, and AI systems are constantly emerging, with the latest iterations set to mature and evolve in the future. Such developments would place even greater demands on AI data centres and factories to support technological developments, including powerful generative AI models, which already demand significant energy and water to function.

Proposed Solution / What is the added-value?

In the face of the current extractive logic, **the CCS could help anchor the AI development in public values**. The involvement of the CCS in AI governance frameworks would inject a different set of priorities into spaces which, up until now, have been dominated by economic and competitive reasoning. Such an approach would prioritise fairness, plurality, and accountability based upon our values. This would reflect not only on the rise of AI systems, but also on future technological advancements that will shape our society.

The strategy should adopt a sustainable, forward-looking approach to AI in the CCS with the meaningful involvement of CCS in its governance and development. A Pandora's box of new ethical challenges and threats to the CCS could be introduced by innovative AI models, quantum computing, and disruptive new technologies in the future, which is why robust frameworks for collaboration, knowledge-sharing and expert discussions on AI in the CCS are essential. Fostering spaces for dialogue and collaboration between the CCS, policy-makers, researchers and platforms is necessary to address the challenges of our times, to boost the discoverability of cultural works, and to create structured frameworks to address future challenges. More sustainable and forward-thinking approaches to AI in the CCS are also needed in educational, research, training, and collaborative structures. It is vital that current challenges, including the climate, environmental, social and cultural costs associated with the rapid development and uptake of AI systems, are addressed while also looking beyond the issues we face today to create frameworks to better adapt to future challenges.

Hybrid and interdisciplinary competencies, including combinations of artistic and technological skills, are also essential for successful approaches to AI in the CCS. Through gaining greater insight into how AI models and systems work and operate, cultural and creative professionals can assess ethical considerations for their development and uptake in their sectors, better identify and address biases, and make better decisions surrounding their use. Everyone should therefore have the right to learn and improve their digital competencies with respect for AI ethics and human creative work, while ensuring that the latter is not devalued in the process.

<u>Recommendations</u>

- **Establish a European Commission Expert Group on AI in the CCS to monitor and report on the implementation of the strategy**, ensuring the representation of diverse CCS, civil society organizations, Member States, EU Accession countries representatives and international observers.
- **Incorporate strategic foresight as a pillar of the AI Strategy** for the CCS, and include a chapter on AI in the CCS in the next annual strategic foresight report, recognising the benefits of foresight for developing cultural resilience, as well as on how to promote energy-efficient AI that addresses the environmental impact of AI infrastructure
- **Introduce a dedicated call for the use of regulatory sandboxes for the CCS under the European Innovation Act**, enabling diverse sectors to collaborate and test innovative new approaches to AI utilising European infrastructure
- **Introduce ethical, trustworthy AI as a dedicated policy area of the upcoming Civil Society Platform** announced in the Civil Society Strategy.

- **Support AI capacity-building for cultural and creative professionals, including through launching a call for proposals** as part of a new Skills Guarantee Pilot under the Union of Skills, rooted in human-first principles and interdisciplinary approaches, covering the effective, sustainable, responsible and transparent use of AI systems and workflows while integrating creative and transversal competencies.
- **Support transnational cooperation in Social Sciences and Humanities research on the impact of AI in the CCS,** including in the Horizon Europe programme as part of a dedicated structural component for culture.
- **Establish interdisciplinary calls for funding on AI and emerging technologies in the CCS in the EIT Culture & Creativity**, supporting the anticipation of the ethical, social, cultural and environmental challenges introduced by AI systems and future technological disruptions.
- **Convene a summit on AI in the CCS**, providing a space for representatives of Member States, EU accession candidate and neighbouring countries, local and regional authorities, cultural institutions, civil society organisations and networks, and the full diversity of CCS to exchange perspectives and share best practices on how to develop and deploy AI systems.
- **Establish a dedicated CCS Advisory Board within the EU's AI gigafactory infrastructure and public AI investment framework**, ensuring that AI systems developed with public funding are governed by public-interest principles and do not replicate the extractive dynamics of commercial AI development.

Conclusions

The importance of an AI strategy for the CCS is highlighted by the number of criticalities and added values that this position paper tries to assemble. The genuine opportunities, such as enhancing accessibility, supporting creative and cultural workers, and improving how institutions deliver their public mission, are concepts that are embedded in the propositions of this document. The recommendations implement this potential and seek to ensure that it is realised on terms that are fair, sustainable and consistent with the values of European cultural life.

The presence of the challenges facing the CCS and the urgency to face them should not be understated. The current trajectory of AI development, with extractive logic and concentrated ownership and governance, is causing damage to the working conditions of the CCS and diversity of expression in public spaces. Job displacement is currently happening and cultural data is harvested without a real partnership between those who own and manage it, while the CCS are too often left to watch from the sidelines removed from where the most consequential decisions and developments are made.

The EU can do better, we are uniquely positioned to do so. Our system of values-based regulatory tradition, and our commitment to cultural diversity, should be mobilised to embrace an updated approach to AI and digital innovation with cultural rights at its core. The EU can foster an approach that is more deliberate and more human than the models currently dominating the global AI landscape.

The recommendations in this document are practical and would represent a concrete step in the right direction. The cost of inaction risks growing exponentially as time goes by: lost diversity, diminished trust, cultural commons emptied for private gain. The relationship between AI and human creativity exists in the full spectrum of collaboration, augmentation, and tension, which policy must also reflect. The AI Strategy for the CCS is an opportunity to address these challenges, and represents **a chance to assert that technology can be channelled towards human creative and cultural flourishing.**

Glossary

Term	Definition
AI model	As defined in the EU AI Act, a component of a system that is trained and incorporates parameters. Once trained, it can generate outputs such as predictions, content, recommendations, or decisions for a given set of inputs. AI models include large language models (LLMs), image generation models and other generative AI systems.
AI system	As defined in the EU AI Act, a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after uptake and that, for explicit or implicit objectives, infers from the input it receives how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.
AI levy	A financial contribution mechanism whereby commercial developers of AI systems, particularly GPAI models above a defined capability or commercial threshold, are required to contribute to a fund whose revenues are redistributed to the sectors and rightsholders whose data and creative works were (supposedly or knowingly) used in training those systems.
CCS	Cultural and creative sectors. All sectors whose activities are based on cultural values and/or artistic and other individual or collective creative expressions. This includes architecture, archives, libraries and museums, artistic crafts, audiovisual (film, television, video games, multimedia), tangible and intangible cultural heritage, design, fashion, music, literature, performing arts, and visual arts.
Critical AI literacy	The capacity to critically understand, evaluate and engage with AI systems, including the foundational mechanisms of development, and the technology limitations, biases and broader, cultural and economic implications. It also encompasses the ability to question AI-generated outputs and recognise power asymmetries embedded in algorithmic systems.
Cultural rights	As defined in Art. 27 of the Universal Declaration of Human Rights, and Art. 13 of the EU Charter of Fundamental Rights, Art. 15 of the International Covenant on Economic, Social and Cultural Rights (1976) and UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions (2005). Cultural rights are rights that protect the entitlement of individuals and communities to access and participate in cultural life, to have their cultural identity recognised and respected, to benefit from their creative contributions, and to have their cultural heritage protected. Cultural rights are a subset of human rights.
Data Provenance	Documentation of the origin, chain of custody, transformations, and intended and actual uses of a dataset. In the context of AI training, data provenance refers to the traceable record of what data was used

Term	Definition
	to train a model, from whom it was sourced, and under what conditions.
DSM Directive	Directive (EU) 2019/790 on copyright and related rights in the Digital Single Market. It regulates, inter alia, text and data mining (TDM) exceptions for research and commercial purposes (Articles 3-4), and the transparency obligations of platforms regarding the use of creative works.
ECF	The European Competitiveness Fund is one of the core components of the next Multiannual Financial Framework 2028-2034, the EU long-term budget, as proposed by the European Commission. The ECF aims to support sectors critical to EU competitiveness and coordinate funding in multiple areas. The Horizon Europe funding scheme falls into this component.
EIT Culture & Creativity	EIT Culture & Creativity is the institutional partnership dedicated to helping European cultural and creative sectors and industries (CCSI) to become more sustainable, resilient and competitive. Established in 2023 by the European Institute of Innovation and Technology (EIT), an EU body, it activates a vast network across the continent and provides funding, critical knowledge and tailored support.
EuroHPC JU	The European High Performance Computing Joint Undertaking (EuroHPC JU) is an EU initiative aiming at supporting the European Union and the EuroHPC JU participating countries to coordinate their efforts and pool their resources to make Europe a world leader in supercomputing.
European Collaborative Cloud for Cultural Heritage (ECCCH)	A European Commission initiative to create a shared digital infrastructure for cultural heritage institutions, researchers, and conservators, enabling collaborative access to digitised heritage data and tools for research, conservation, and education, as well as supporting the prevention of illicit trafficking and climate resilience strategies for heritage assets.
GenAI	As defined by the OECD Report on Generative AI, Generative AI (GenAI) are AI systems capable of generating content (text, images, audio, video, code...) based on patterns acquired from large training datasets.
GPAI	As defined by the EU AI Act, a General Purpose AI is an AI model that is trained with a large amount of data using self-supervision at scale, that displays significant generality and is capable of competently performing a wide range of distinct tasks regardless of the way the model is placed on the market, and that can be integrated into a variety of downstream systems or applications.
LLM	Large Language Model (LLM) is a type of AI model trained on very large corpora of text data to understand and generate natural language. LLMs are a subset of GPAI models and underpin many generative AI applications.

Term	Definition
OMC Working Group	A soft-law governance instrument of the European Union that enables member states to coordinate policies in areas where the EU does not have legislative competence, through the sharing of best practices, benchmarking, and peer review, without producing binding legislation. Multiple OMC groups on cultural policies took place over the last decade.
SMEs	Small and medium-sized enterprises (SMEs) are defined in the EU as organisations whose staff numbers and economic weight fall below certain limits, typically consisting of organisations with fewer than 250 employees (expressed in full-time equivalents - FTE).
Text and Data Mining (TDM)	TDM is an automated analytical technique used to analyse text and data in digital form in order to retrieve additional information including patterns, trends, and correlations. Recent case law (LAION v Robert Kneschke, Germany) defined data crawling of existing content on the web as part of Text and Data Mining.

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