European
IP Helpdesk

FACT SHEET

New Directive on Copyright and Related Rights in the Digital Single Market

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Introduction

Initiated in 2016, the legislative process aiming to modernise the EU copyright rules came to an end on 15 April 2019, when the European Council approved the *Directive on Copyright and Related Rights in the Digital Single Market*. This Directive intends to make EU copyright rules fit for the digital age. Unlike regulations, the Directive is not directly applicable and will require the transposition into the national legal systems of each member state.

Copyright is used to describe a set of rights granted to creators over their artistic works, thus covering a wide variety of intellectual creations: books, music, paintings, sculptures, photography, films, computer programmes, databases… However, it is important to know that copyright does not protect an idea itself, but the expression of the idea. In a nutshell, copyright bestows two types of rights upon the right holders:

- **Moral rights** which, in most member states, cannot be waived and protect non-economic interests of authors (such as the right to be recognised as the author)
- **Economic rights** which seek to grant the author the possibility to obtain financial benefits from the exploitation of their work by allowing them to control its reproduction (making a copy in physical or digital format), the distribution of said copies, making them available in the digital environment, as well as any adaptation of the original work (e.g. translating the original book or turning the book into a movie)

The last changes in the EU copyright legislation had been introduced through a Directive in 2001, when the online environment did not have the same width and importance as it does today. Indeed, the digital age has transformed the way in which researchers carry out their work, how we conceive business and share knowledge and information. Current copyright rules are not adapted to the growing digital landscape – a fact which made it necessary to bring these rules up to speed and offer an appropriate regulatory framework that encourages creative work and innovation while striking the balance with freedom of expression and the need to promote research, education, access to information and cultural heritage.

1. The three new main exceptions

With the aim to remove digital barriers between member states, to widen the scope of use of materials for educational, research and cultural purposes, as well as to improve the conditions within the digital copyright market place, the new Directive introduces the following changes[1]:

Text and data mining

Use of works in digital cross-border teaching activities

Preservation of cultural heritage

a. Text and data mining exception

According to the 2018 STM report[2], the global research community generates more than 3 million scientific papers per year. Since it is impossible to go through that massive amount of data manually, computers and algorithms can be used to analyse the vast database of scientific works. This is where the importance of Text and Data Mining (**TDM**) comes into play. The United Kingdom Intellectual Property Office (UKIPO) defined TDM as *"the process of deriving information from machine-read material"*[3]. This process involves copying large quantities of material, extracting the data and recombining it into different patterns.

Being able to electronically analyse large amounts of copyright-protected and non-protected works enhances efficiency and saves cost and time. It allows researchers to detect patterns, trends, correlations and all types of useful information that the traditional human processing activities cannot detect on a manual basis. Hence, TDM allows the extraction of new knowledge where no correlation has been established or expressed before. To give an example: The processing of data from a large number of scientific papers in a specific medical field could suggest a possible link between a gene and a disease. This would also increase awareness within the scientific community regarding the value of the content that has been published to date, in favour of a more rigorous and efficient attitude towards research and experimentation (duplication can be avoided and past trials can be used and built on).

The TDM process usually requires making copies of the original data and datasets in order to extract information. Even though the work copied is not used as such, but only the information or facts extracted from it, this use has so far collided with article 2 of Directive 2001/29 (**InfoSoc Directive**) and the exclusive right of reproduction, which grants copyright owners *"the exclusive*

[1] Please note that not all new rights and exceptions are included in the present fact sheet. Indeed, we highlight only those exceptions that have a direct impact on SMEs, universities and researchers. For example, article 14 and article 8 were left out since they do not directly affect our target groups.

[2] Johnson, R. Watkinson, A. and Mabe, M.; STM Report "An overview of scientific and scholarly publishing" October 2018, page 5

[3] UKIPO, "On the exceptions to copyright"

right to authorise or prohibit direct or indirect, temporary or permanent reproduction by any means and in any form, in whole or in part".

Against this background, there were two options to avoid copyright infringement: either to obtain the authorisation of each copyright holder (e.g. through a copyright licence), which seems unrealistic when there is a need to process a large amount of terabytes from all over the world. The second option was to rely on the copyright exception introduced by article 5(1) InfoSoc, referring to "temporary acts of reproductions" which, according to its own wording, did not provide an appropriate answer for TDM.

Therefore, and given the massive growth and increased use of data available on the internet, the European legislator decided that a TDM exception would be necessary. Accordingly, two exceptions were introduced. The first can be found in article 3:

Article 3
The **mandatory exception** introduced by article 3 will benefit **research organisations or universities** using TDM **for research purposes solely**. Therefore, take into account that you will not benefit from TDM if you are:

- An SME or any business acting for non-commercial purposes (for example, news reporting or research); or
- Universities using TDM for other purposes than scientific research.

You should also take into account that the exception **only covers the reproduction** and **extraction** rights. Therefore, the distribution right and right of communication to the public **are out of the scope** of the exception. This means that you will have the right to copy the work and extract any essential information from it. However, you will not be authorised to disclose the content of the work or allow its circulation, whether it is in physical or digital format.

Consequently, if the result of the TDM includes an extract from the original "mined" work, communication to the public or re-distribution of the work will, most probably, not be an option. This will depend on the characteristics of the extract reproduced: is the combination of words or the extract original enough to be protected by copyright (article 2 of the InfoSoc Directive)?

The answer can be found in the judgment from the CJEU Case C-05/08[4] that attempts to shed some light on the subject. As explained in the judgment, the right of reproduction covers any original subject matters and nothing in the InfoSoc Directive indicates that an extract or part of a work should be treated any differently than the whole of it. Although words as such are not considered an intellectual creation, their combination is. Therefore, certain isolated sentences or parts of sentences *"may be able to reflect the author's creativity and originality, becoming*

[4]Judgment of the Court of 16 of July 2009, case C-05/08 "Infopaq International A/S v. Danske Dagblades Forening" EU:C:2009:465

liable to come within the scope of protection provided by article 2 of the InfoSoc Directive". Hence, a case-by-case interpretation is required, so you should be careful when reproducing parts of works belonging to third parties as the result of a TDM process.

Remember that, according to article 7.1, the exception set out by article 3, cannot be set aside contractually. Hence, **you should refuse any contractual clause establishing otherwise**, since this clause would be deemed as unenforceable. However, nothing seems to prevent right holders to restrict TDM unilaterally by using Technological Protection Measures (**TPM**).

The **second TDM exception** introduced by the Directive is the one set out by **article 4**. It applies to any entity wishing to TDM, hence, SMEs could potentially benefit from this exception. However, contrary to article 3's TDM exception, here the legislator introduced a so-called **"opt-out"** mechanism. Right holders are allowed to opt out of this exception for the **general public** as long as they do so in an "appropriate manner". This should be done in form of a contractual agreement, a unilateral declaration or by explicitly stating so in the terms and conditions of the use of a website, for example. It is important to keep in mind that article 4 refers to the general public, while the research community has its own exception set out in **article 3** that **does not admit** an "opt-out".

b. Use of works in digital cross-border teaching activities

Technologies have disrupted every area of our lives and the education sector is no exception. In fact, given its audience (mostly young and highly connected), this sector should, in theory, adapt faster to be able to meet their expectations. Most students have grown up in a connected environment and expect this level of connection to be maintained in their learning environment. Traditional rigid modes of classroom-only education are bound to disappear and be replaced by more dynamic and flexible learning spaces.

In order to keep up with younger generations and comply with the European Commission's Digital Education Action Plan[5], there was a great need of introducing an exception that allows the use of digital materials in cross border teaching activities. Indeed, up to now, article 5.3(a) of the InfoSoc Directive allowed for these materials to be copied and made digitally available but this was mainly limited to the national environment.

Now, pursuing the idea of harmonising and making it easier to use digital materials within the framework of digital and **cross-border** teaching activities, article 5 creates a mandatory exception as long as these activities are carried out by **educational establishments**.

[5] European Commission, "The Digital Education Action Plan"

This exception requires the protected content to be used under the following conditions:

- For **illustration purposes**: here, take into account that although the Directive does not limit the extent and nature of the works, this might not be the case at national level. Therefore, the extent of the exception should be carefully interpreted in conjunction with already existing laws at national level.

- Only for **teaching and learning activities performed by educational establishments**, therefore SMEs will not benefit from this exception.

- For **non-commercial use** only.

- Under the responsibility of the educational establishment, **on its premises** or through a **secure electronic environment**. This secure electronic environment should be understood as a digital environment to which only the teaching staff and students enrolled in a study programme have access, through a secure identification system that will require password authentication (e.g. an intranet).

- Only **to the extent that is necessary** for the purposes of that activity. This concept cannot be defined precisely and will, in any case, require a case-by-case assessment.

As can be inferred from the wording of the article and Recital 22, libraries, archives or museums **cannot directly benefit** from said exception. However, **indirectly**, when providing education in partnership with a school, college or university, the exception could be extended to them.

However, one should bear in mind that the Directive allows member states to make the application of the exception **fully or partially conditional** upon the existence of **suitable licences**, as long as those licences cover the same uses as those allowed under the exception. Meaning, that when transposing the Directive into their national legislation, member states can decide that the exception can only be relied on where no licences are available for a specific work or for a specific use. This formulation allows **partial coverage** from the licences, therefore any use that is left outside the scope of the licence, remains subject to the exception. With the aim of removing any burden from the educational establishments, all available licences should be **published and accessible** in a way that is to be determined by each member state individually.

As for the interpretation of the term “suitable licence”, there is no clear answer at this point. “Suitable” most likely refers to licences adapted to the specific needs of educational institutions. It is yet to be determined whether “suitable” also makes reference to the price and conditions under which the licence is being offered.

c. Preservation of cultural heritage

Following the introduction of two relevant exceptions by the new Copyright Directive and being well aware of the need to preserve and increase accessibility to our cultural heritage[6], 24 member states signed a declaration of cooperation on advancing digitisation of cultural heritage on 9 April 2019. Therefore, the exception for the preservation of cultural heritage enabling a more "massive" digitisation and the use of out-of-commerce works by said institutions is crucial in order to facilitate the digitalising endeavours.

This digitising endeavour is not new. Back in 2004, Google had the idea of creating a "universal library" by digitising every book available worldwide as long as such an action did not violate the authors' rights. It did so by providing the technology and the funding to the libraries in exchange for the chance to incorporate these books to its database. Hence, the provision introduced by article 8 is a response to the legal issues that arose from this digitisation project. Until now, large-scale digitisation was slowed down and somehow impeded as it required clearance item by item, directly from the rights holder; not only to make a digital copy but also to make it available to the public (two rights exclusively granted to authors). Many authors could not be found and the ones in charge had to rely on the Orphan Works Directive .

In a nutshell, in member states where this is not yet the case, article 6 will allow cultural heritage institutions to make a **digital reproduction** of all works, as long as:

- The digital reproduction is performed by a **cultural heritage institution**. This entails that any **publicly accessible** library, museum or archive, film or audio institutions could benefit from this exception. This also affects educational establishments, research organisations and public sector broadcasting institutions as far as their permanent collection is concerned.

- The work is part of their **permanent collection**. Recital 29 of the Directive defines a "permanent collection" as one including all copies of works **owned** or **permanently held** by the institution. Therefore, any work that is held by the institution, whether it is because of a transfer of ownership, a licence, because the institution has become its legal deposit or because a permanent custody agreement has been signed in its favour, will fall under this exception.

- The copy is only made for **preservation purposes**. The need to preserve might be derived from **technological obsolescence** of the medium containing the work (e.g. a cassette for music) or the **degradation of the original support** (e.g. a painting when the support has been damaged).

[6] European Commission, "EU Member States sign up to cooperate on digitising cultural heritage"

- It is made **only to the extent necessary** for such preservation. Therefore, reproductions going beyond preservation purposes remain subject to the authorisation of the right holder or subject to other limitations or exceptions.

The Directive itself, in Recital 28, expressly allows the institutions **to rely on third parties** for the digitisation task, since they might lack equipment and expertise. All actions undertaken by these third parties in the course of the digitisation process are considered as made on behalf of the cultural heritage institution and always **under its responsibility.**

Please note that this article allows the institutions to make digital copies of the works, but it does not permit for this digital copy to be put into circulation in the online environment[7].

Watch out!
The exception introduced by said article cannot be stripped of meaning through contractual provisions or the use of TPMs.

Article 8, on the other hand, intends to make it easier for these institutions to obtain the necessary licences to **disseminate, without borders, the cultural heritage in their possession in favour of the public**. In case no licence is available, the Directive grants an exception in favour of the cultural heritage institution, which allows them to digitise and to proceed with the dissemination.

Watch out!
All of the above is subject to compliance with a series of requirements.

[7]Take into account that for works that have fallen into the public domain and whose copyright protection has expired, digitisation and publication on the internet do not cause any problem (e.g. the Louvre has digitised numerous art works and made them available on its website).

2. Online use of copyright-protected content

a. Protection of press publications regarding online use

In the digital age, the emergence of new business models such as news aggregators and media monitoring services have made it necessary to find a way to ensure fair compensation of both press publishers and authors of the journalistic work.

In 2014, Google News was shut down in Spain after a Spanish law was passed **requiring** services posting links and excerpts of news articles to **pay a fee** to the Association of Editor of Spanish Dailies. The difference is that, back then, publishers were not allowed to opt out and could not decide to offer their content for free. Article 15 is the EU's response to a situation that needed to be addressed and harmonised at European level. The objective pursued remains the same, i.e. to ensure that press publishers can control and object to any unauthorised use of their press content and receive fair compensation.

The main objective of article 15 is to try to remedy the continuous decline in revenues in the press sector, attributed partially to news aggregators, since press publishers were not able to control, properly license, or oppose to the use of their content by these subjects. Thus, this article requires member states to extend certain rights granted by the InfoSoc Directive to press publishers in order to strengthen their position when negotiating licences for their press content. The rights concerned here are reproduction (controlling copies of the work), **communication to the public** and **making available to the public** (deciding when and how to make the work available online) regarding the online use of press publications.

The **main target of article 15 are websites in charge of aggregating and organising news**, that will no longer be allowed to continue to do so as they use to until now.

First and foremost, the Directive itself seeks to **limit the impact** of this article by stating that this only applies to **journalistic publications** (i.e. literary works, pictures or videos) published in the context of an economic activity, regardless of the format in which the original publication has been released. Therefore, the following are left out of the scope of this original assignment:

- Publications published for scientific or academic purposes.
- Websites publishing news, such as a blog, when the activity is not carried out under the initiative, editorial responsibility and control of a news publisher.

Moreover, in order to avoid any negative repercussion on users when quoting, linking, aggregating, or finding and using works, the article explicitly states that the following act shall **not be deemed** as a **copyright infringement:**

- **private** or **non-commercial** use by private users;
- **acts of pure hyperlinking** (i.e. no snippets of the relevant text are included);
- the **use of individual words** or **very short extracts**.

All of the above entails that SMEs doing business within the news aggregation area or whose businesses are affected by this, should make sure to either obtain the corresponding licence allowing them to proceed with the usual news aggregation system; or obtain the authorisation from the publisher to link and introduce snippets for free; or simply copy the hyperlink without introducing any preview of the content of the article.

The rights granted apply for a **two-year period** after publication, counting from the first January following the publication date **without any retroactive effect**. Take note that, as the author of a press publication, you are entitled to receive an effective share of the increase in revenues that this new right might generate.

b. Use of protected content by online content sharing service providers

This is one of the most controversial articles of the Directive, since people got the impression that this might entail a restriction of online freedoms. In a nutshell, this article **amends the liability of service providers who share online content and is focused on user-generated content.** Up until now, article 14 of the Electronic Commerce Directive[8] established that *"Where an information society service is provided that consists of the **storage of information** provided by a recipient of the service, Member States shall ensure that the service provider is **not liable for the information stored** at the request of a recipient of the service, on condition that […]".* Hence, up to now, owners of copyright-protected content had to let platforms such as YouTube know of the existence of a violation, and the platforms would then proceed to remove the infringing content. The infringement claim was therefore brought against the individual that uploaded the content, not against the platform since it was considered the mere host and not belonging to the infringing party. In addition, platforms were required to adopt a reactive attitude, not a proactive one, in the protection of copyright.

First and foremost, it is important to understand that the liability and obligations established by this article will **only apply to your business if you are a platform whose main activity** is to **provide access** to a large amount of **copyright-protected content** and you do so with **commercial purposes** (regardless of whether it is monetised by e.g. allowing companies to place advertisements before a video, or because you are charging your users a periodical fee).

[8] Directive 200/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market.

Under the new article 17, Information Society Service Providers (ISPs) falling under the above criteria now have the **obligation to make sure** that all copyright content is **properly licensed** before it is uploaded on their platform. This entails the need for ISPs to sign numerous licensing agreements with musicians, authors and other right holders in order to make sure that they are allowed, as a platform, to publish copyright works online, works that are uploaded by their users. This in turn means that **if no licence is secured** and infringing content is uploaded and published, **ISPs will be held liable** for such an infringement, since they are performing an unauthorised act of communication to the public, which is one of the exclusive rights granted to the author of a work by copyright laws. Hence, responsibility will arise **unless** the ISP can demonstrate that:

- It made **"best efforts"** to get permission from the copyright holder.
- According to **"high industry standards of professional diligence"**, it made best efforts to ensure that the infringing material was not made available.
- It acted swiftly to disable access or to remove the content and to prevent further uploads.

Although it is true that the Directive states that these obligations do not entail a general monitoring obligation, the wording of the Directive (*"prevent **future uploads** of infringing content"*) will require ISPs to establish a filter facilitating the monitoring task and allowing quick identification and response when facing infringing materials, as they could otherwise be held liable. Creating, implementing and perfecting such a filter is a considerable time and money investment. Let's take, for example, YouTube's Content ID System which is already in place and enables to detect copyright-protected content (music or video) and to block it automatically. The system then allows the user that uploaded the content to file an appeal in case there is a disagreement regarding the infringing nature of the content. In order to create this filter, YouTube had to invest approximately EUR 100 million, an economic investment that SMEs falling outside the threshold will not be able to bear.

As mentioned above, there is a threshold under which companies will not be liable for the infringing content uploaded by their users. Therefore, as an SME, you will not be required to comply with the requirements of article 17 as long as:

- Your company has been active for less than three years; **and**
- Your annual turnover is below EUR 10 million; **and**
- The number of monthly unique visitors on your platform does not exceed 5 million.

Article 17 will not apply to the following:

- **Electronic communication networks**, i.e. any transmission system that allows the conveyance of signals by wire, radio, optical or other means (e.g. satellite network, mobile network or cable television networks)
- **Cloud services** (e.g. Dropbox, iCloud)
- **Online market places** (e.g. Amazon, Etsy)
- **Not-for-profit scientific or educational repositories** (e.g. a university's intranet)
- **Not-for-profit online encyclopaedias** (e.g. Wikipedia)

Although the article calls upon member states to make sure that users are still able to rely on the traditional exceptions set in their favour (e.g. quotation, criticism, review or parody), these new provisions remain a serious concern for many stakeholders. Admittedly, technology evolves at a fast pace, but for the time being it might be difficult for companies that want to put in place automatic filters to ensure that these filters are able to distinguish **the context** in which materials are being uploaded. The filter might also be unable to detect cases in which one of the creators uploading the content has been granted **a non-exclusive licence.**

3. Transparency obligations and best-seller rights for authors and performers

a. Fair remuneration in exploitation contracts for authors and performers

Provisions under Chapter III were introduced with the aim of increasing transparency in contractual relationships and ensuring that the initial remuneration agreed on between the authors is **periodically reviewed** and **adjusted** to the revenues that are actually being generated and the current exploitation hiatus.

When the author of a work signs with a publisher or a record label, there is no way to predict how the public is going to react. Therefore, the initial agreement cannot foresee unexpected success (e.g. the publisher of the first Harry Potter book did probably not expect the book to turn out the international best seller it became). In this case, the original remuneration becomes clearly disproportionate in comparison to the actual revenue the work is generating. Hence, this will ensure fair and proper remuneration for authors and performers. As part of this right, as an author you **will have the right to receive annual reports regarding the exploitation of your works.**

Working hand in hand with article 19, once right holders have sufficient knowledge of the exploitation and the revenues generated by their work; article 20 allows them to seek additional and fair remuneration that goes beyond what was originally agreed on. As the author of the work, article 20 entitles you to enforce your rights against the original contractual counterpart (e.g. your publisher) or third parties to whom the exploitation rights have been subsequently granted.

Watch out!
These rights **cannot** be set aside contractually. Hence, you should refuse any contractual clause establishing otherwise, since this clause would be deemed as unenforceable.

b. Right of revocation

When a creator reaches an agreement with a publisher or a record label, it is because they have been given legitimate expectation regarding the exploitation and dissemination of their work. Given that authors are, in most case, in a weaker bargaining position they could sign long-term contracts where they have no possibility to renegotiate. Therefore, the European legislator introduced a mechanism to match the **legitimate expectations** of authors or performers when they decide to license or transfer their rights. As such, if their work is not exploited within a reasonable period of time, they will now be granted the right to revoke said license. In order to avoid arbitrary or rushed decisions, member states are allowed to set a number of requirements and limitations to the exercise of such a right.

4. Conclusion

The Directive was a much expected update of the copyright rules in a fast-paced growing digital environment. Many improvements were achieved, but the most important step is yet to come: its **implementation**. Indeed, member states now have two years to implement this Directive into their own national legislations. Each member state will then shape the mandatory exceptions and new rules, and adapt them to their national legislation, which means that we might be seeing different developments and requirements in each of them.

The main objective of this Directive is to strike a **balance between copyright and the needs of the digital environment** by helping e.g. right holders to protect their works against non-authorised exploitation, especially within the digital environment. Although most concerns voiced by digital / web stakeholders and defenders of a “free internet” were related to a possible limitation of the freedom of expression, mainly regarding article 17, the article is much more complex and nuanced. Certainly, the wording of the Directive is very broad, hence, at this point we will have to wait for national implementation and see how this will actually translate.

In essence, **the Directive is a major step towards fairer remuneration of works on the internet.** Indeed, authors, publishers and journalists should be able to profit from the internet and the exploitation possibility it offers in the same way the platforms hosting their content do. With the Directive, scientific research, cross-border education and activities towards the protection of our cultural heritage will be able to reap the benefits offered by new technologies and the digital environment.

In summary:

- **Will the Directive limit users and their freedom online?** No, the rules applicable to press publication and their online use only apply to commercial services, but not to users. Therefore, they will remain free to share links to online news on any social media platform.

- **Will the Directive ban memes and GIFs?** No, memes and GIFs are covered by the exception of quotation, criticism, caricature, parody and pastiche that will now be recognised by all member states.

5. Useful resources

- Directive (EU) 2019/790 of the European Parliament and of the Council 17 April 2019 on copyright and related rights in the Digital Single Market and amending Directives 96/9/EC and 2001/29/EC
- European Commission - Frequently Asked Questions on Copyright Reform (Last update April 2019)
- European Libraries and archives
- European IP Helpdesk – Fact Sheet Copyright Essentials

Our main goal is to support cross-border SME and research activities to manage, disseminate and valorise technologies and other IP rights and assets at an EU level. The European IP Helpdesk enables IP capacity building along the full scale of IP practices: from awareness to strategic use and successful exploitation.

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