



Promoting fairness, transparency and cultural diversity in Europe's digital music ecosystem

POLICY BRIEF



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Why this matters

CONTEXT AND POLICY RELEVANCE

Europe's music ecosystem has been fundamentally reshaped by digital platforms. Music streaming services and social media platforms now act as central intermediaries in music discovery, monetisation, and visibility, shaping revenue flows and cultural exposure across the European Union.

While digital services have expanded access and enabled new creative practices, they have also concentrated economic and informational power. Opaque contractual arrangements, limited access to data, and algorithmic curation systems increasingly determine which artists are heard, how creators are remunerated, and which repertoires gain prominence.

Three policy concerns are particularly pressing:

- 1** Fair and proportionate remuneration remains difficult to enforce despite existing EU rules.
- 2** Opacity in data, metadata, and algorithms undermines accountability and cultural diversity.
- 3** Fragmented governance across copyright, platform regulation, competition law, and cultural policy weakens enforcement and policy coherence.

Addressing these challenges is essential to safeguard sustainable creative labour markets, cultural and linguistic diversity, and public trust in Europe's digital cultural environment.

Evidence base and methodology

This policy brief is based on Fair MusE, a Horizon Europe-funded research project applying an **interdisciplinary, evidence-based approach** to fairness, transparency, and cultural diversity in Europe's digital music ecosystem.

The research integrates **legal, economic, and technical analysis**. Legal and regulatory work examined EU copyright, platform regulation, and competition law (DSM Directive, CRM Directive, P2B Regulation, DSA, DMA, AI Act), identifying persistent fragmentation, uneven applicability to music services, and structural limits to creators' ability to exercise their rights. Economic and industry research analysed business models, contracts, and revenue flows through literature review, surveys, interviews, and case studies, highlighting power asymmetries and market concentration. Technical analysis assessed

metadata quality, data access, and recommender systems, testing indicators and tools to evaluate how data governance and algorithms affect visibility, diversity, and remuneration.

Across all strands, Fair MusE followed a **participatory methodology**, engaging creators, CMOs, IMEs, platforms, policymakers, and civil society. The recommendations in this brief are **directly derived from the project's empirical findings**, ensuring continuity between scientific research and policy action.

Fair MusE also operationalised its findings through three outputs: a Music Copyright Infrastructure for interoperable rights data (D5.1), a Music Data Dashboard of sector indicators (D5.2), and a Fairness Score to benchmark platform practices (D5.3).

Key points

Three systemic deficits underpin current unfairness

Fair MusE identifies a transparency deficit (data, contracts, algorithms), a remuneration deficit linked to structural bargaining asymmetries, and an enforcement deficit limiting creators' ability to exercise their rights, making transparency a precondition for fairness.

Fair remuneration remains difficult to enforce

Despite EU rules on "appropriate and proportionate" - and therefore 'fair' - remuneration, music composers and performers continue to face low and unpredictable income due to information asymmetries, opaque revenue-sharing models, and uneven national implementation.

Opacity in data, metadata, and algorithms undermines accountability

Limited access to platform data, fragmented music metadata across the music industry, and weak transparency of recommender systems prevent verification of remuneration, restrict oversight, and distort visibility.

Algorithms shape value and exposure with limited scrutiny

Ranking and recommendation systems strongly influence discovery and market outcomes, often reinforcing concentration and placing independent and minority-language repertoires at a disadvantaged position.

EU regulatory tools exist but lack coordination

The DSM Directive, DSA, DMA, P2B Regulation, competition law, and the AI Act address relevant issues, but their application to music streaming services remains fragmented or unclear.

Data governance is foundational to fairness and diversity

Without interoperable, standardised, and accessible data infrastructures, neither fair remuneration nor cultural diversity can be effectively safeguarded.

Mapping the challenges in Europe's digital music ecosystem

Fair MusE's research identifies a set of **systemic and interrelated challenges** that hinder fairness, transparency, and cultural diversity in Europe's digital music ecosystem. These challenges do not operate in isolation: shortcomings in remuneration, data governance, and institutional coordination reinforce one another, limiting the effectiveness of existing legal and policy instruments.

These challenges point to the need for a coordinated policy response that links fair remuneration, data and algorithmic transparency, and institutional governance. The following chapter translates such a "challenge map" into concrete and actionable policy recommendations.

For analytical and policy purposes, the challenges are grouped into **three main clusters**:

- 1 Fairness and remuneration
- 2 Data and algorithmic governance
- 3 Institutions and enforcement.

The challenges identified by Fair MusE lead to policy recommendations that are detailed in Section 5 and can be categorised as follows →

- Stronger law enforcement
- Creators' contract oversight
- Further harmonisation of EU copyright laws
- Greater clarity on authorship rules
- EU supervision especially in the field of collective rights management

1

FAIRNESS & REMUNERATION

- Greater access to platform data
- Standardisation and interoperability of music metadata
- Algorithmic audits through effective data transparency tools
- Anti-fraud measures against manipulation and distortion of audience metrics
- Creation of a Music Data Space fostering usage metadata standardisation and algorithmic fairness

2

DATA & ALGORITHMS

- Cross-regulatory alignment: copyright, competition law and platform regulation
- Stronger coordination in monitoring and enforcing existing rules
- EU Music Observatory and a Music Data Space in response to poor or insufficient empirical evidence of repertoire usage and what influences exposure

3

INSTITUTIONS & ENFORCEMENT

From challenges to policy action

RECOMMENDATIONS

The systemic challenges outlined in the previous chapter call not for isolated adjustments, but for a **coherent policy response** that reconnects remuneration, data governance, algorithmic accountability, and institutional oversight. Fair MusE's research demonstrates that fairness in the digital music ecosystem cannot be achieved through a single regulatory instrument or market intervention. Instead, it requires **coordinated action across legal, technical, and governance domains**, with a focus on enforceability, transparency, and long-term sustainability. The following recommendations translate this analytical framework into **targeted, actionable measures** that build on existing EU law, strengthen its practical impact, and align digital music markets with Europe's cultural, social, and economic objectives.

1

Fair remuneration and contractual fairness

CORE CHALLENGE

Music creators lack effective metrics and tools to assess and secure fair (namely: "appropriate and proportionate") remuneration.

POLICY ACTION

- Strengthen enforcement of Articles 18 and 19 DSM Directive through clearer transparency standards and effective sanctions and align with Article 17 enforcement where relevant for UGC platforms.
- Increase oversight of contractual practices shaping revenue allocation and market access.
- Support collective bargaining and sector-specific dispute resolution mechanisms, including model contractual clauses on transparency, audit rights and data access.
- Clarify authorship and remuneration frameworks in relation to AI and user-generated content.
- Improve EU-level coordination and supervision of CMOs and IMEs.

2

Transparency, data access and algorithmic accountability

CORE CHALLENGE

Secrecy or opacity in data, metadata, and algorithms undermines fairness and cultural diversity.

POLICY ACTION

- Require disclosure and auditability of recommender systems, including clear labelling of editorial, algorithmic, and sponsored content.
- Enable secure access to platform data under existing EU frameworks (DSA, DMA) and support the creation of a European Music Data Space within the EU Cultural Data Hub.
- Establish EU-wide metadata and interoperability standards.
- Support functional data portability for users and creators.
- Strengthen anti-fraud measures and promote algorithmic literacy.
- Support UCPS pilots and consider prominence or discoverability measures for European and minority-language repertoires.

3

Coordination, monitoring and enforcement

CORE CHALLENGE

Fragmented governance weakens enforcement and policy coherence.

POLICY ACTION

- Clarify joint application of DSM, DSA, DMA, P2B Regulation, competition law, and the AI Act.
- Strengthen enforcement capacity at EU and national level.
- Establish permanent monitoring mechanisms under the supervision of a European Music Observatory.
- Promote structured stakeholder dialogue and participatory governance building towards an EU Music Policy Forum and participatory governance mechanisms linked to the European Music Observatory.



What this enables

→ For creators

More transparent remuneration, stronger bargaining power, and fairer visibility.

→ For cultural diversity

Greater exposure for European, independent, and minority-language repertoires, aligned with EU cultural objectives.

→ For policymakers

Improved evidence-based policymaking, coherent enforcement, and long-term monitoring capacity.

→ For citizens

A more diverse, trustworthy, and sustainable digital music ecosystem.

Immediate next steps

- Issue cross-regulatory guidance clarifying the application of EU rules to music streaming services.
- Launch music metadata and data-access pilot initiatives.
- Support capacity-building for creators, CMOs, and regulators.
- Initiate preparatory work for a European Music Observatory.

Selected Glossary

Collective Management Organisations (CMOs)

Member-owned entities that manage copyright and related rights on behalf of authors and other rightholders, including licensing, royalty collection, usage monitoring, and revenue allocation.

Digital Service Providers (DSPs)

Online platforms that enable users to access, share, or consume digital content, including music streaming services and social media platforms.

Gatekeepers

Core platform services as designated under the Digital Markets Act due to their significant impact on the internal market and their ability to control access between business users and end users.

Independent Management Entities (IMEs)

For-profit organisations that manage and license rights for rightholders without being controlled by their members.

Metadata

Information describing a musical work or recording, such as their respective identifiers - ISWC ('International Standard Musical Work Code') and ISRC ('International Standard Recording Code') - and other information such as title,

authorship, rightholders, performers and release date, which is essential for usage tracking and remuneration.

Music Streaming Services (MSSs)

Digital services providing licensed, on-demand access to recorded music (e.g. Spotify, Apple Music, Deezer, Amazon Music, YouTube Music).

Recommender systems

Algorithmic systems used by platforms to rank, curate, and suggest content to users, shaping visibility, discovery, and audience reach.

User-centric payment system (UCPS)

A revenue distribution model linking each subscriber's payment to their individual listening behaviour, as opposed to pro-rata systems based on total streams.

Very Large Online Platforms (VLOPs)

Online services designated under the Digital Services Act (DSA) for reaching at least 45 million users in the EU and subject to enhanced transparency and accountability obligations.

Selected References

Fair MusE project deliverables

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- D2.2: Giuseppe Mazziotti, 'Music Creators' Rights under EU Law' (2025)
- D2.3: Marta Cantero Gamito, Gil Dagan, Maria Jose Schmidt-Kessen, and Eirini Volikou, 'Roles of EU competition law and platform regulation across online music platforms' (2025)
- D3.1: Valdy Wiratama, Heritiana Ranaivoson, Adelaida Afilipoaie, and Anders Henten, 'From value networks for recorded music to music ecosystem' (2024)
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- D5.2: Jannick Kirk Sørensen, Heritiana Ranaivoson, and Valdy Wiratama, 'Music Data Dashboard' (2025)
- D5.3: Daniel Bedoya and Antoine Henry, 'Fairness Score for Platforms' (2025)

EU legislation and policy

- Directive (EU) 2019/790 on copyright and related rights in the Digital Single Market (DSM Directive)
- Directive 2014/26/EU on collective management of copyright and related rights (CRM Directive)
- Regulation (EU) 2019/1150 on platform-to-business relations (P2B Regulation)
- Regulation (EU) 2022/1925 on contestable and fair markets in the digital sector (Digital Markets Act, DMA)
- Regulation (EU) 2022/265 on digital services (Digital Services Act, DSA)
- Regulation (EU) 2024/1689 on artificial intelligence (AI Act)

Selected studies and reports

- Antal, D., A Green Paper on AI, Data Governance, and Metadata Policies for Europe's Music Ecosystem (2025)
- Costas, J., Hacker, P., & Vonderau, P., Remuneration of Music Creators in the Streaming Economy (2025)



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