

European Commission call for evidence on an AI Strategy for the Cultural and Creative Sectors – Recommendations for own replies

Premise: GenAI services such as Suno have exploited the works of European music authors **without any consent, remuneration, and transparency**. This Strategy should therefore align with the recommendations of the European Parliament (EP) report on copyright and AI, and complement the ongoing review of the EU copyright framework by acting on the following key concerns for music authors.

Key Concerns

Unfair competition and substitution: AI content competes with music authors and threatens to replace them. According to Deezer (July 2026), nearly 90,000 AI-tracks are uploaded to the platform each day, more than half of daily uploads. Many creators are also seeing fake AI tracks impersonating them being uploaded to their artist profiles on DSPs.
Remuneration and streaming fraud: AI content on DSPs dilutes the royalty pool for music authors. Also, AI music is overwhelmingly used to commit fraud: Deezer reported that 85% of the streams generated by fully AI-generated tracks were fraudulent in 2025.
Lack of transparency of AI content: Although DSPs have taken measures to label AI music in some capacity, initiatives remain completely voluntary and fragmented, failing to provide authors and listeners with coherent and transparent rules.
Unfair contractual practices: Many record labels and publishers are striking deals with AI services without informing, involving, or seeking consent from authors. In new contracts, they are often including AI rights clauses as conditions for signing.
Threat to cultural diversity: AI-generated music and AI recommendations risk harming the discoverability of European music. Algorithms often reinforce popularity loops and privilege English-language content, marginalising European music and leading to a “homogenisation” of music.

Recommendations

- 1. Ensure the principles of consent, transparency, and remuneration of creators, in line with the recommendations of the EP report on copyright and AI.** In particular, we support calls for an additional legal framework to clarify licensing rules and establish a licensing market, the fair remuneration of creators, and full transparency of training data.
- 2. Ensure the labelling of AI-generated content in music streaming, and that fraudulent uploads to artists’ profiles are stopped.** We need clear rules for the detection, labelling, and exclusion from remuneration of AI-generated content on DSPs. This could be achieved by expanding the obligations in the AI Act, or by facilitating the adoption of clear and binding commitments from industry players.
- 3. Make EU funding conditional on the fair remuneration of authors and performers, and ensure funding prioritises human-created works and performances.** The upcoming AgoraEU programme should only support beneficiaries that comply with EU law and respect authors’ rights. Moreover, public funding should prioritise works and performances which include a substantial and identifiable human creative contribution.
- 4. Promote the discoverability of European music on online platforms.** This could be achieved, for **instance**, by expanding the provisions of the Audiovisual Media Services Directive for European works to also cover European musical works.
- 5. Launch tools, workshops, and other initiatives to inform authors about their rights in the context of AI and make sure they can enforce these rights.**