

**From:** [REDACTED]@ccianet.org>  
**Sent:** jeudi 20 janvier 2022 08:51  
**To:** [REDACTED] (CAB-BRETON)  
**Cc:** CAB BRETON [REDACTED]  
**Subject:** Concerns with the national transposition of the Copyright Directive in Austria

Dear [REDACTED]

I'm writing to you on behalf of the Computer & Communications Industry Association (CCIA Europe). CCIA is a not-for-profit organization representing a wide range of companies in the computer, internet, information technology, and telecommunications industries. Please find more information on our membership [here](#).

We respectfully would like to bring to your attention our **concerns with the implementation of the EU [Copyright Directive](#), especially in Austria.**

**We invite you to urge Austria not to force publishers to act collectively via a Collective Management Organisation (CMO), as Austria has [notified](#) its draft law to the European Commission.**

The current Austrian draft ([EN](#) / [DE](#)) includes a provision which would make it mandatory for all publishers to licence these rights collectively, even though the European Commission, and Commission Breton clearly has [specified](#) "that Member States are not allowed to implement Article 15 (...) through a mechanism of mandatory collective management". The Austrian suggestion not only does this go against the spirit of the EU rules, but such a move would weaken the nature of publishers' rights, forcing publishers to act collectively via a Collective Management Organisation (CMO) and creating unnecessary barriers to the functioning of the EU internal market.

It would also make it impossible for publishers and platforms to conclude pan-European licences. Content under such licences available in e.g. Germany would have to be made unavailable in Austria until an agreement has been reached with a collecting society. The restriction on the provision of licensing services thus also leads to a restriction in the availability of news and other information across borders within the EU.

Please do not hesitate to reach out to us if you have any questions or would like to discuss these concerns further.

Kind regards,

[Redacted]

[Redacted]

Computer & Communications Industry Association (CCIA Europe)

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