

Brussels, June 15th 2018 r.

Dear Sir or Madam,

We have been closely following the debate on the Copyright Directive in both the European Commission and the European Parliament. We have expressed our position in various fora, as well as during our participation in the EU wide discussion – including acting as a speaker during two events on copyright organized by MEP Ryszard Czarnecki. We would like to once more express our serious concerns regarding consequences that key elements of the proposed copyright regulation may cause.

We fully support the European Commission's objectives of the Digital Single Market Strategy. We encourage our members and partners to positive approach and active support for digital transformation in Europe- Having said that, we believe extra care shall be given to all measures imposed on the rapidly developing, yet still fragile online markets.

At an overall level, we welcome the Copyright Directive revision initiative that aims at transparent, enforceable and uniform policies for the European Union. We support the introduction of regulations that ensure development of micro and small enterprises, startups and business across our community that faces global competition in the digital market. We shall take under consideration the importance of providing knowledge and data for all European business – startups, SMEs and companies. We all would like to see the European Union as a home to innovation, an environment that allows long term growth, that welcomes new products and business models.

The Digital Single Market should provide a level playing field for all entities, hence must not introduce discriminatory measures, such as Art. 3 that limits content exploration to public research bodies only. Having in mind dynamically increasing need for data analysis enterprises, we believe that only flexible and inclusive legislation will keep European entities competitive in the global digital market.

We should make sure individual contributors, bloggers, science, business and small, so micro enterprises retain free access to information under both Art. 11. and Art 13. This is critical to allow the digital economy to grow, and the European community and economy with it. We should all take under consideration further implications the introduction of neighbouring rights may have for democracy, freedom of speech and publishing. In our opinion it may turn out to be a danger for smaller publishers, thus depriving consumers of access to pluralistic media, and clearing the way for more disinformation and low quality content.

Union of Entrepreneurs and Employers

Management Board: Cezary Kaźmierczak – President, Vice-presidents: Tomasz Pruszczyński, Marcin Nowacki



We also express our concerns about apparent attempts at questioning the eCommerce framework, which has served the EU digital economy well and allows for the creation of a vibrant online ecosystem, which allows every EU citizen to receive and impart lawful information without undue interference. The changes being now contemplated to this robust framework would not only introduce burdens and legal uncertainty for online enterprises (SMBs being particularly vulnerable in this regard), but also raise serious doubts as to their compatibility with fundamental rights.

We call for actions that will strengthen Digital Single Market and not negatively impact further development of cutting edge enterprises necessary for further innovative and inclusive growth of the European Union.

Marcin Nowacki

Vice-president

More information:

Agata Boutanos

a.boutanos@zpp.net.pl

+ 32 476 59 06 02

Union of Entrepreneurs and Employers

Management Board: Cezary Kaźmierczak – President, Vice-presidents: Tomasz Pruszczyński, Marcin Nowacki

Nowy Świat 33, 00-029 Warsaw, email: biuro@zpp.net.pl, tel: 22 826 08 31, www.zpp.net.pl