

Brussels, 29 January 2019

Your Excellency Deputy Ambassador,  
Dear European Commission Vice-President Andrus Ansip,  
Dear MEPs Voss, Adinolfi, Boutonnet, Cavada, Dzhambazki, Geringer de Oedenberg,  
Joulaud, Maštálka, Reda, Stihler,

We are writing you on behalf of business organisations, civil society organisations, creators, academics, universities, public libraries, research organisations and libraries, startups, software developers, EU online platforms, and Internet Service Providers.

Taking note of the failure of the Council to find a majority for a revised negotiation mandate on Friday 18 January, we want to reiterate our position that the **manifest flaws in Articles 11 and 13** of the proposal for a Copyright Directive in the Digital Single Market constitute insurmountable stumbling blocks to finding a balanced compromise on the future of Copyright in the European Union. Despite more than two years of negotiations, it has not been possible for EU policy makers to take the serious concerns of industry, civil society, academics, and international observers such as the UN special rapporteur on freedom of expression into account, as the premises both Articles are built on are fundamentally wrong.

In light of the deadlock of the negotiations on Articles 11 and 13, as well as taking into consideration the cautious stance of large parts of the [creative industries](#), we ask you to **delete Articles 11 and 13 from the proposal**. This would allow for a swift continuation of the negotiations, while the issues that were originally intended to be addressed by Articles 11 and 13 could be tackled in more appropriate legal frameworks than this Copyright Directive.

We hope that you will take our suggestion on board when finalising the negotiations and put forward a balanced copyright review that benefits from wide stakeholder support in the European Union.

Yours sincerely,

## Europe

1. [European Digital Rights \(EDRi\)](#)



2. [Allied for Startups](#)



3. [Civil Liberties Union for Europe \(Liberties\)](#)



4. [Copyright for Creativity \(C4C\)](#)



5. [Create.Refresh](#)



6. [European Bureau of Library, Information and Documentation Associations \(EBLIDA\)](#)



7. [European Internet Services Providers Association \(EuroISPA\)](#)



8. [European Network for Copyright in Support of Education and Science \(ENCES\)](#)



9. [European University Association \(EUA\)](#)



10. [Ligue des Bibliothèques Européennes de Recherche – Association of European Research Libraries \(LIBER\)](#)



11. [Open State Foundation](#)



12. [Scholarly Publishing and Academic Resources Coalition Europe \(SPARC Europe\)](#)



## AUSTRIA

13. [epicenter.works – for digital rights](#)



14. [Digital Society](#)



15. [Initiative für Netzfreiheit \(IfNf\)](#)



16. [Internet Service Providers Austria \(ISPA Austria\)](#)



## BELGIUM

17. [FusionDirectory](#)



18. [Opensides](#)



19. [SA&S – Samenwerkingsverband Auteursrecht & Samenleving \(Partnership Copyright & Society\)](#)



## BULGARIA

20. [BlueLink Foundation](#)



## CZECH REPUBLIC

21. [Iuridicum Remedium \(IuRe\)](#)



22. [Seznam.cz](#)



## DENMARK

23. [IT-Political Association of Denmark](#)



## ESTONIA

24. [Wikimedia Eesti](#)



## FINLAND

25. [Electronic Frontier Finland \(EFFI\)](#)



26. [Finnish Federation for Communications and Teleinformatics \(FiCom\)](#)



## FRANCE

27. [April](#)



28. [Conseil National du Logiciel Libre \(CNLL\)](#)



29. [NeoDiffusion](#)



30. [Renaissance Numérique](#)



31. [Uni-Deal](#)



32. [Wikimédia France](#)



## GERMANY

33. [Bundesverband Deutsche Startups](#)



34. [Chaos Computer Club](#)



35. [Deutscher Bibliotheksverband e.V. \(dbv\)](#)



36. [Digitalcourage e.V.](#)



37. [Digitale Gesellschaft e.V.](#)



38. [eco – Association of the Internet Industry](#)



39. [Factory Berlin](#)



40. [Förderverein Informationstechnik und Gesellschaft \(FITUG e.V.\)](#)



41. [Initiative gegen ein Leistungsschutzrecht \(IGEL\)](#)



42. [Silicon Allee](#)



43. [Wikimedia Deutschland](#)



## GREECE

44. [Open Technologies Alliance - GFOSS](#) (Greek Free Open Source Software Society)



45. [Homo Digitalis](#)



## ITALY

46. [Hermes Center for Transparency and Digital Human Rights](#)



47. [Roma Startup](#)



48. [Associazione per la Libertà nella Comunicazione Elettronica Interattiva \(ALCEI\)](#)



## LUXEMBOURG

49. [Frënn vun der Ënn](#)



## NETHERLANDS

50. [Bits of Freedom \(BoF\)](#)



51. [Dutch Association of Public Libraries \(VOB\)](#)



52. [Vrijschrift](#)



## POLAND

53. [Centrum Cyfrowe Foundation](#)



54. [ePaństwo Foundation](#)



55. [Startup Poland](#)



56. [ZIPSEE Digital Poland](#)



## PORTUGAL

57. [Associação D3 – Defesa dos Direitos Digitais \(D³\)](#)



58. [Associação Nacional para o Software Livre \(ANSOL\)](#)



## ROMANIA

59. [APADOR-CH \(Romanian Helsinki Committee\)](#)



60. [Association for Technology and Internet \(ApTI\)](#)



## SLOVAKIA

61. [Sapie.sk](#)



## SLOVENIA

62. [Digitas Institute](#)



63. [Forum za digitalno družbo \(Digital Society Forum\)](#)



## SPAIN

64. [Asociación de Internautas](#)



65. [Grupo 17 de Marzo](#)



66. [MaadiX](#)



67. [Rights International Spain](#)



68. [Xnet](#)



## SWEDEN

69. [Dataskydd.net](#)



70. [Föreningen för Digitala Fri- och Rättigheter \(DFRI\)](#)



## UNITED KINGDOM

71. [Coalition for a Digital Economy \(COADEC\)](#)



72. [Open Rights Group \(ORG\)](#)



## INTERNATIONAL

73. [Alternatif Bilisim Derneği \(Alternatif Bilisim\)](#)  
(Turkey)



74. [ARTICLE 19](#)



75. [Association for Progressive Communications \(APC\)](#)



76. [Center for Democracy & Technology \(CDT\)](#)



77. [COMMUNIA Association](#)



78. [Derechos Digitales](#) (Latin America)



79. [Electronic Frontier Foundation \(EFF\)](#)



80. [Electronic Information for Libraries \(EIFL\)](#)



81. [Index on Censorship](#)



82. [International Federation of Library Associations and Institutions \(IFLA\)](#)



83. Israel Growth Forum (Israel)



84. [My Private Network](#)



85. [Open Knowledge International](#)



86. [OpenMedia](#)



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87. [SHARE Foundation](#) (Serbia)



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88. [SumOfUs](#)



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89. [World Wide Web Foundation](#)

