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COMMISSION STAFF WORKING DOCUMENT

**Assessment of the effects of
Commission Recommendation (EU) 2023/1018 of 4 May 2023 on combating online
piracy of sports and other live events**

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1. INTRODUCTION AND BACKGROUND

In May 2023, the Commission adopted the Recommendation on combating online piracy of sports and other live events (“Recommendation”). The aim of the Recommendation is to assist Member States, national authorities, rightholders and providers of intermediary services in making the best use of existing legal remedies to tackle the unauthorised retransmissions of live events.

The Recommendation encourages the relevant stakeholders to take effective, balanced and appropriate measures, in particular regarding the prompt treatment of notices by intermediaries and the use of dynamic injunctions in Member States, subject to appropriate safeguards. It also aims at fostering cooperation among the different market players and among national authorities across the EU. Finally, the Recommendation encourages market players to increase the availability, affordability and attractiveness of commercial offers for end users and stresses the importance of awareness-raising activities.

The Recommendation builds on the relevant provisions of Directive 2001/29/EC¹ (“InfoSoc Directive”), Directive 2004/48/EC² (“IPRED”), and the Digital Services Act (“DSA”)³.

The DSA was adopted shortly before the Recommendation and became fully applicable on 17 February 2024. It introduced several provisions that are particularly relevant to the fight against online piracy. These include: (i) procedural rules on orders to act against illegal content applicable to all providers of intermediary services⁴, (ii) notice and action mechanisms that require providers of hosting services to act upon notices concerning illegal content in a timely manner⁵, (iii) a trusted flagger mechanism⁶ requiring online platforms (a sub-category of hosting services) to ensure that notices submitted by trusted flaggers are given priority and are decided upon without undue delay, and (iv) transparency reporting obligations for providers of intermediary services, including additional obligations for online platforms, very large online platforms and very large online search engines⁷.

This Staff Working Document aims to assess the progress achieved by Member States and stakeholders in applying the measures of the Recommendation. It is based on several consultation activities, including the monitoring undertaken by the European Observatory on Infringements of Intellectual Property Rights, hosted by the European Union Intellectual Property Office (“EUIPO Observatory” or “Observatory”).

¹ See Article 8(3) of Directive 2001/29/EC of the European Parliament and of the Council of 22 May 2001 on the harmonisation of certain aspects of copyright and related rights in the information society (OJ 2001 L 167, p.10).

² See Directive 2004/48/EC of the European Parliament and of the Council of 29 April 2004 on the enforcement of intellectual property rights (OJ L 157, 30.4.2004, p.45).

³ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act).

⁴ DSA, Articles 9 and 10.

⁵ DSA, Article 16.

⁶ DSA, Article 22.

⁷ DSA, Articles 15, 24, and 42.

2. MONITORING OF THE RECOMMENDATION

A. Monitoring of the effects of the Recommendation by the EUIPO Observatory

The Commission services have worked closely with the EUIPO Observatory since the adoption of the Recommendation to monitor the actions and measures taken by Member States and market players.

To guide the monitoring and data collection, the Commission published key performance indicators (“KPIs”) in July 2023⁸. These KPIs relate to the volume of unauthorised retransmission of sports and other live events in Member States (KPI 1), the prompt treatment of notices related to unauthorised retransmission of live sports events and other live events (KPI 2), the use of dynamic injunctions for live events (KPI 3), and the availability, affordability, attractiveness and awareness raising of the legal offer (KPI 4).

On this basis, the EUIPO Observatory has conducted a structured data collection in which all the interested stakeholders – rightholders, Member States’ authorities and intermediary service providers – were invited to submit relevant information on the implementation of the measures included in the Recommendation. Two data collection exercises, preceded by a test run, took place between June 2024 and July 2025, gathering data for 2024 and the first half of 2025⁹. While rightholders and Member States were very active in the monitoring exercise, the participation of intermediaries was very limited¹⁰.

B. Dedicated network of national administrative authorities

The Commission entrusted the Observatory with establishing a dedicated network of administrative authorities (“dedicated network”) to regularly exchange information on the legal systems and measures put in place at national level, and on the challenges encountered and good practices established in addressing online piracy of live events.

The dedicated network was launched on 10 October 2023 and has since met twice a year¹¹. Additionally, the EUIPO organised in September 2024 a workshop dedicated to the technical aspects of implementing online blocks of content and the structure of the internet for the members of the dedicated network. Another technical workshop for the members of the network was organised in October 2025.

The network allowed national authorities to exchange information on their legal frameworks applicable to (live event) piracy, including the use of dynamic injunctions, cooperation with online intermediaries and the challenges and new trends in online piracy. In this context,

⁸ See: [Recommendation on online piracy of sports and other live events: the Commission services publish Key Performance Indicators | Shaping Europe’s digital future](#)

⁹ The first data collection exercise (test run) took place in April 2024 and aimed to gather data for the first six months of 2024. A second exercise was conducted in January 2025, covering data for the entire year 2024, while the third exercise took place in July 2025 regarding data from the first half of 2025. The EUIPO made a number of templates available to facilitate the submission of contributions by stakeholders.

¹⁰ In 2024, 17 rightholders contributed to the exercise, while in the first half of 2025 there were 18 submissions. As regards Member States, 16 contributed in 2024 and 14 in the first half of 2025. By contrast, no submissions were received from intermediaries for 2024, and only one intermediary submitted data for the first half of 2025.

¹¹ The second meeting of the network took place on 10-11 June 2024, the third meeting on 2-3 December 2024, and a fourth meeting was held on 29 April 2025.

national authorities have also shared details of their efforts to promote legal offers, including by joining EUIPO's *Agorateka* portal¹².

C. The Commission's call for evidence

To complement the EUIPO's data collection exercise and the dedicated network meetings, the Commission published a call for evidence¹³ on 30 April 2025, which remained open for feedback until 4 June 2025.

The call for evidence aimed at gathering the views and input of any interested party on the effects of the Recommendation, particularly on how effectively Member States and stakeholders had implemented its measures. It also sought views on the potential impact of the DSA on live event piracy and on whether the Recommendation continues to meet its initial objectives. Additionally, it invited feedback on whether further EU-level measures are needed in the fight against piracy, including as regards other types of copyright-protected content.

The Commission received 95 contributions to the call for evidence, which were submitted by several categories of stakeholders, including rightholders, intermediaries, citizens, and public authorities. Information on the stakeholder feedback can be found in the relevant sections of this document, as appropriate.

3. EVOLUTION OF PIRACY OF LIVE EVENTS

In the context of the monitoring exercise, the Observatory collected data on the volume of live event piracy, covering web-based piracy and IPTV piracy, in line with KPI 1¹⁴. Web-based piracy refers to traffic to pirate websites offering unauthorised streaming of live events and was measured directly. IPTV piracy refers to the illegal streaming of TV, films, and live sports over internet protocol networks, sometimes mimicking legitimate IPTV services but bypassing official subscription channels. Unlike web-based piracy, IPTV could not be measured directly, due to the difficulty to obtain quantitative information on such illegal activities. Instead, it was measured indirectly, based on the number of visits to pirate IPTV registration websites, which are used to sign up for these illicit IPTV services¹⁵. Due to this limitation in the data collection, it is difficult to provide a comprehensive overview of the evolution of online piracy of live events since the adoption of the Recommendation.

The data collected by the Observatory shows that, after a peak in October 2023, web-based piracy slightly decreased throughout 2024¹⁶. An increase can however be observed just before the beginning of 2025, with a peak in February/March 2025. Overall, the data shows that visits to illegal websites appear to be cyclical, with two annual peaks – around March/April and

¹² *Agorateka* is a European online content portal, developed by the EUIPO through the European Observatory on Infringements of Intellectual Property Rights. It helps consumers identify legal offers for music, TV and films, games, books and sports events in participating European countries through a single portal. The portal links to existing national portals and promotes the creation of such portals in countries where there are currently none, with the help of a toolkit provided by the EUIPO.

¹³ For more information on the call for evidence, please see [Combating online piracy of sports and other live events – assessment of the May 2023 Commission Recommendation](#).

¹⁴ The exercise involved collecting data on web-based piracy and IPTV-based piracy, which was mainly carried out by the external contractor MUSO.

¹⁵ Data gathered by MUSO for the EUIPO in the latter's KPI collection exercise up until July 2025.

¹⁶ EUIPO report available at <https://www.euipo.europa.eu/en/observatory/enforcement/combating-piracy>.

September/October – and lower levels in July. This could be linked to sports competitions and holiday seasons.

The graph below, extracted from the Observatory report, shows the evolution of web-based piracy for all live events across the 27 Member States.

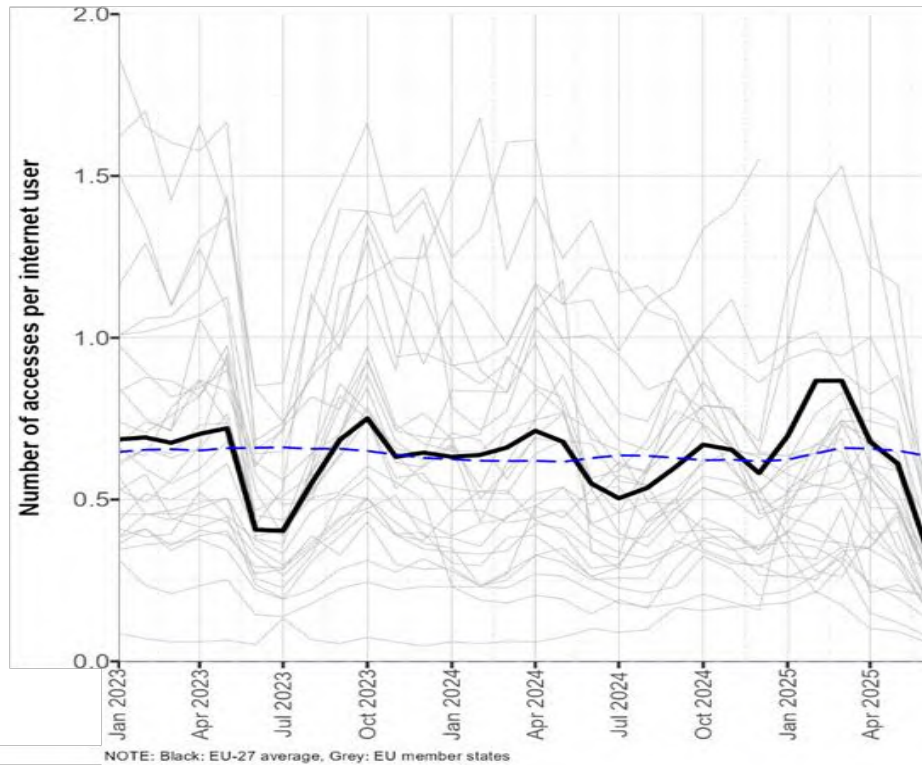


Figure 1 Evolution of web-based piracy of live events in the 27 Member States

The Observatory report also notes that piracy overall is on the rise, with forms of piracy such as IPTV and app-based piracy increasing.

The graph below shows the evolution of visits to websites for illegal IPTV registration in the Member States between 2023 and the first semester of 2025. The fact that such visits may have decreased after a peak at the beginning of 2025 does not necessarily mean that the level of piracy through IPTV services has decreased. It could rather be due to an accumulation of previously registered users and subscriptions to IPTV services by other means.

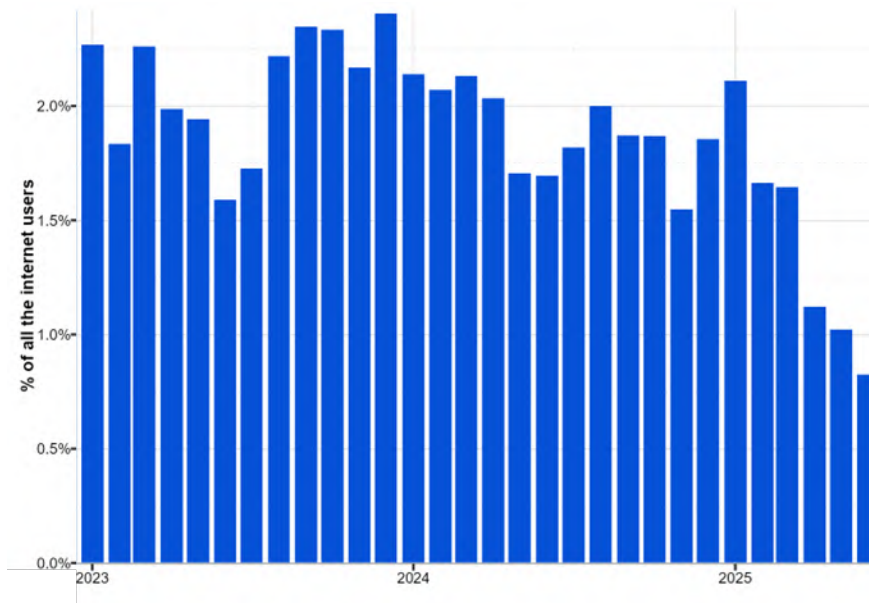


Figure 2: Visits to IPTV registration websites in all Member States between 2023-2025

Other sources of information provide further insight into the recent trends in online piracy of live events. For example, in France, a study undertaken by the Regulatory Authority for Audiovisual and Digital Communication (ARCOM) in 2024 revealed that 18% of French consumers opted for illicit live sports streaming services¹⁷. Another study shows that, while pirated content consumption has overall decreased in France, the level of illegal offerings remained constant. Moreover, the share of live events piracy in total pirated content consumption rose from 7% in 2023 to 9% in 2024¹⁸. In Italy, live sports event piracy has remained at the same level in 2023-2024, concerning 15% of the adult population, with 22% using illicit IPTV¹⁹. In the Nordic region (Finland, Sweden, Norway and Denmark), more than 1.5 million households subscribed to illicit IPTV in the spring of 2025, representing an increase of 200 000 households, or +16%, compared to spring 2024²⁰.

Broadcasters reported increases in live event piracy in their feedback to the call for evidence. For example, in Poland, 9 747 infringements were detected (an average of 31 per match) in 2023, 12 544 infringements were detected (an average of 43 per match) in 2024 and 8 531 infringements were detected between January and May (an average of 69 per match)²¹ in 2025.

¹⁷ [La consommation illicite des programmes sportifs en 2024 - Résultats détaillés | Arcom](#).

¹⁸ The studies were conducted by the Association de Lutte contre la Piraterie Audiovisuelle and Mediavision in France for 2024, with the contribution of the Centre National du Cinéma et de l'image animée for 2023, and are available at <https://www.alpa.paris/wp-content/uploads/2024/06/Consommation-illegale-sur-Internet-Bilan-2023-VDEF.pdf> and <https://www.alpa.paris/wp-content/uploads/2024/06/Etude-Piratage-Internet-Avril-2024-VD.pdf>.

¹⁹ Study conducted by FAPAV/Ipsos in 2024, available online at [INDAGINE FAPAV/IPSOS 2024 | FAPAV](#).

²⁰ Study conducted by Mediavision, information from the press release, available at [News | Mediavision](#) <https://www.mediavision.se/en/2025/05/28/mediavision-over-1-5-million-nordic-households-have-access-to-illegal-iptv/>

²¹ Feedback received in the context of the call for evidence.

Finally, information received from several Member States and stakeholders suggests that an increasing number of piracy cases relate to content delivered via specific content delivery networks (CDN) whose services are being misused for this purpose²².

Beyond live events, online piracy also affects other time-sensitive content, such as first viewings of films and other types of content. Some rightholders consider that piracy peaks when high-quality pirated copies of films become available online during their theatrical releases, undermining the film's box office performance and damaging stakeholders' interests by quickly eroding the film's value²³.

4. ENSURING THE PROMPT TREATMENT OF NOTICES RELATED TO UNAUTHORISED RETRANSMISSIONS

The Recommendation encourages hosting service providers to promptly treat the notices submitted by rightholders in live events, taking into consideration the specific nature of live transmissions with the aim of minimising the harm caused during unauthorised retransmissions.

Under Article 22 of the DSA, online platforms (a category of hosting services) are already subject to specific obligations regarding the notices sent by trusted flaggers which should be treated with priority and without undue delay. Building on the DSA, the Recommendation encourages providers of hosting services other than online platforms to cooperate with rightholders, by effectively engaging with trusted flaggers, and by developing and using technical solutions to facilitate the processing of notices.

Recital 22 of the Recommendation clarifies that the rules on notices do not apply to other providers of intermediary services, such as CDNs or reverse proxies. These services are often the only ones that rightholders can identify when they detect unauthorised retransmissions of live events, because they are used to obfuscate the origin of the unauthorised retransmission. Some of these intermediaries allow notices to be sent and contribute to the identification of the IP addresses used by rogue operators, thereby playing an important role in combating live events piracy. The Recommendation encourages these intermediaries to cooperate with rightholders and providers of hosting services to facilitate the identification of the source of unauthorised retransmissions (paragraphs (7) and (25)).

This section aims to assess the progress made with respect to these recommendations.

A. Evidence gathered on the treatment of notices

The information gathered for the purpose of this assessment has shown a limited improvement as regards the prompt treatment of notices by providers of hosting services. In particular, it emerges from the available data that online platforms have a high response rate to notices from rightholders, while other hosting services' response rate appears to be rather low, and in some cases non-existent. The response rate is also very low or non-existent for other intermediaries who are able to identify and locate the source of unauthorised retransmissions of live events. Regarding those providers that take action and respond to notices, the data collected and the submissions of rightholders in the call for evidence highlight that a significant issue remains

²² Feedback received in the context of the call for evidence; see also EUIPO report.

²³ Feedback received in the context of the call for evidence.

the time taken to respond. In most cases, the illegal retransmission is not removed during the live event²⁴.

The data gathered in the EUIPO monitoring exercise provides granular information with respect to these findings. It distinguishes between the notices sent to the different types of intermediaries: online platforms, dedicated server providers (DSPs – referring to a type of hosting service provider that offers dedicated rather than shared server resources) and other intermediaries, some of which are not hosting services. The latter category included ‘other’ and ‘other hosting providers’, terms used by rightholders, which means that no differentiation could be made in the data collection exercise. This category therefore included not only ‘hosting service providers’ but also intermediaries such as CDNs, ‘proxy’ and ‘cloud’ services²⁵.

The graphs below show an increase in the total number of notices sent by rightholders between 2024 and the first half of 2025. This was likely due to a change in the anti-piracy approach of one of the sports event organisers participating to the monitoring exercise, which affected the comparability of the results²⁶. Moreover, between 2024 and the first half of 2025, the distribution of notices also changed, with a slight decrease in notices sent to DSPs and a larger decrease as regards online platforms. A sizeable increase in notices sent to other intermediaries can be noted. Overall, the large majority of notices were addressed to DSPs and other intermediaries (both hosting service providers and other).

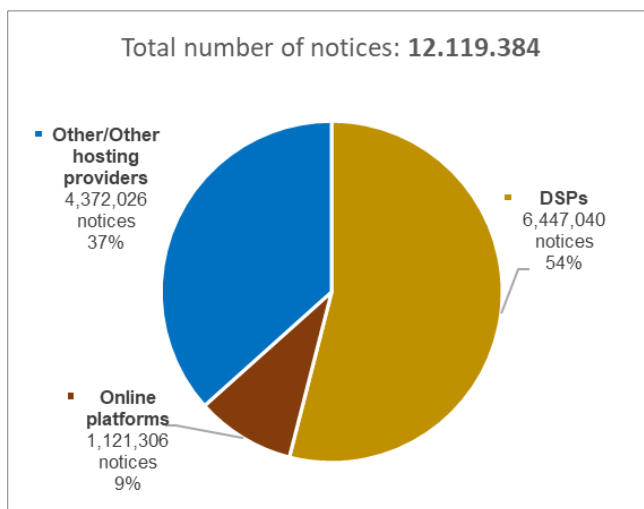


Figure 3: Number and percentage of notices sent by rightholders (January to December 2024)

²⁴ Feedback received from rightholders in the context of the call for evidence.

²⁵ See EUIPO report: The number of 4 372 026 noticed refers to notices sent to intermediaries such as ‘CDNs’, ‘proxy’, ‘cloud’, as well as ‘hosting service providers’, which may have not been identified as such at the time of notification, or because the intermediary offers services that could fall into several categories (‘mere conduit’, ‘caching’ or ‘hosting’).

²⁶ See EUIPO report.

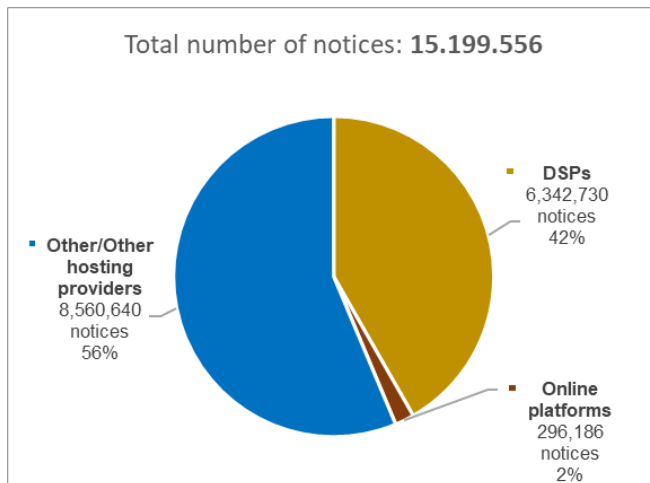


Figure 4: Number and percentage of notices sent by rightholders (January to June 2025)

According to the EUIPO data, DSPs and other hosting and non-hosting intermediaries suspend access to illegally streamed content during the live transmission in fewer than 10% of cases, compared to an average suspension rate of 96% for online platforms (during the live transmission)²⁷.

This information is corroborated by a report dated February 2025 analysing data submitted by several rightholders for 2024²⁸. The report shows that, in 2024, DSPs received 52% of the notices sent by rightholders, followed by other hosts of streaming services (38% of the notices) and online platforms (10% of the notices)²⁹. The response to notices also varied by type of intermediary, with DSPs suspending the illegal retransmission in 11% of cases during the live transmission. Requests to online platforms lead to a 98% suspension rate, while requests to other hosts of streaming services had a suspension rate of 8%. In addition, the report found that online platforms performed better than DSPs at preventing illegal content from reoccurring during the day (7.6% for online platforms while reoccurrence for DSPs amounts to 39.5%)³⁰. Overall, the report notes that online platforms are the most responsive in implementing notice-and-takedown mechanisms. The February 2025 report was updated by a report published in September 2025. This report shows an increase in the number of notices and confirms that platforms remain the most responsive to notices, with a 97% suspension rate during the event³¹.

Some of these figures are also supported by information provided by respondents to the call for evidence. For example, one broadcaster reported that, in some instances, more than 3 000 illicit streams, disseminated on hundreds of live streaming websites, can be detected for a single sport event. Out of the over one million notices sent to hosting providers by that broadcaster,

²⁷ The data on suspension of illegal streaming is also influenced by the change in strategy of the respective sports organiser. For example, compared to 2024, the suspension rate of the illegal stream following a notice dropped from 19% to 5% in 2025, but would have dropped considerably less if the data from the sports organiser in question was not taken into account.

²⁸ Grant Thornton report, February 2025, contracted by the Live Content Coalition representing several holders of rights from the live content sector, available online at <https://www.grantthornton.co.uk/globalassets/1.-member-firms/united-kingdom/pdf/publication/2025/gt-combatting-online-piracy-february-2025.pdf>.

²⁹ Ibid, Grant Thornton report.

³⁰ Ibid, Grant Thornton report, page 4.

³¹ Updated Grant Thornton report, September 2025, available at <https://www.grantthornton.co.uk/globalassets/1.-member-firms/united-kingdom/pdf/search/gt-combatting-online-piracy-september-25-final.pdf>.

only 1.4% of the streams notified were removed during the event. As regards online platforms, the feedback refers to a removal response time varying from one platform to another³². Other rightholders reported that their notices were largely ignored by intermediaries or that they did not result in prompt removal³³.

Cooperation among market players is, as mentioned above, one of the measures underlined in the Recommendation. In this respect, the information collected for this assessment suggests that the existence of cooperation agreements between rightholders and intermediaries is likely to have a positive impact on the response rate to notices, at least as regards online platforms. The EUIPO data collection exercise shows that the number of notices submitted under cooperation agreements led to suspensions in 87% of cases in the first half of 2025 and to 55% in 2024. The positive effect of cooperation agreements is corroborated by the February 2025 report mentioned above, which notes that 73% of notices submitted based on cooperation agreements resulted in suspensions. However, disparities remain in responses from online platforms and other intermediaries. More specifically, of the notices sent to DSPs, of which only 1% have cooperation agreements in place, 11% lead to suspension of the notified content, compared to an 84% suspension rate by online platforms (which are more likely to have a cooperation agreement)³⁴.

The DSA is an important instrument for the regulation of online intermediaries' conduct, including through its notice and action mechanisms. While available data is insufficient to show a direct correlation between the entry into force of the DSA and intermediaries' removal of protected content following a notice, the high response rate to notices of online platforms, and their enhanced collaboration with rightholders, seem to indicate increased diligence on the part of at least some of the hosting service providers. Data registered on the DSA Transparency Database suggest there has been an increasing and significant number of IPR-related statement of reasons which follow content moderation decisions, submitted by providers of online platforms since 2023³⁵. Also, while the process for designating trusted flaggers is ongoing in Member States, at the time of publication of the assessment, fifteen entities with expertise in intellectual property infringements, including several representing rightholders' interests, were granted trusted flagger status³⁶. It is expected that the DSA will normalise progressively the certification mechanisms for attributing the status of trusted flaggers.

B. Remaining concerns of rightholders and intermediaries

Overall, while some improvement can be noted in the prompt treatment of notices, many rightholders consider that there is no effective notice-and-takedown mechanism for live content. Rightholders cite various reasons, including that (i) many infringers are located in and use infrastructure outside the European Union³⁷, and therefore beyond the jurisdiction of

³² Information received in the context of the call for evidence.

³³ Information received in the context of the call for evidence.

³⁴ Grant Thornton report.

³⁵ The DSA Transparency Database is available at <https://transparency.dsa.ec.europa.eu/>.

³⁶ The trusted flagger list is available online at <https://digital-strategy.ec.europa.eu/en/policies/trusted-flaggers-under-dsa>;

³⁷ The Commission publishes regularly the Counterfeit and Piracy Watch List, which contains examples of reported marketplaces or service providers whose operators or owners are allegedly resident outside the EU and which reportedly engage in, facilitate or benefit from counterfeiting and piracy, including of live sports events.

Member States³⁸; (ii) the slow handling of notices sent at weekends and outside business hours, when the most important sporting activities usually take place³⁹; (iii) some hosting providers are not sufficiently incentivised to swiftly remove the infringing content⁴⁰.

Rightholders consider therefore that, to make the system more efficient, additional legislative measures are needed. While they consider the DSA to be a welcome addition to the toolbox to combat illegal content, it is in their view insufficient to tackle live event piracy.⁴¹ Some of the reasons relate to the specific scope of the DSA, the lack of precision regarding what constitutes ‘expeditious’ action to prevent access to unauthorised retransmissions of live events and uncertainty as to whether they would be granted trusted flagger status in their respective Member States. In their view, the obligations outlined in the DSA should be extended to other types of intermediaries, such as CDNs, reverse proxies, and domain registrars. They also call for an extension of the ‘know your business customer’ (KYBC) obligations under the DSA to intermediaries involved in online piracy. Some also deem that the DSA is insufficiently enforced by the relevant competent authorities, with some Digital Service Coordinators (‘DSCs’) enforcing the rules more than others and call for further cooperation among the DSCs in this regard⁴².

Conversely, online intermediaries, notably internet access providers, are concerned about the high costs of and investments required for the swift removal of infringing content⁴³. Other online intermediaries oppose extending the KYBC obligations and any potential obligations to remove content within a specified time limit, claiming this would lead to overblocking. They argue that the full implementation of the DSA should be given priority before any new measures are considered⁴⁴.

5. INJUNCTIONS ADDRESSING UNAUTHORISED RETRANSMISSIONS

Article 8(3) of the InfoSoc Directive and Article 11 of IPRED provide for the possibility to obtain injunctions against infringers or intermediaries whose services are used by a third party to infringe copyright or related rights.

Mirror websites offering infringing copyright-protected content can often appear very quickly once one site is blocked, which makes traditional blocking injunctions insufficient for tackling piracy, in particular of live events⁴⁵. In the 2017 guidance on certain aspects of Directive 2004/48/EC, the Commission noted that under the condition that necessary safeguards are

The last edition is available at: [https://ec.europa.eu/transparency/documents-register/detail?ref=SWD\(2025\)132&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2025)132&lang=en)

³⁸ Feedback received in the context of the call for evidence from various rightholders, including broadcasters and TV producers.

³⁹ Feedback received in the context of the call for evidence from rightholders, notably sports event organisers.

⁴⁰ Feedback received in the context of the call for evidence by rightholders, including sports event organisers and broadcasters.

⁴¹ Feedback received in the context of the call for evidence.

⁴² Feedback received in the context of the call for evidence.

⁴³ Feedback received in the context of the call for evidence.

⁴⁴ Feedback received in the context of the call for evidence.

⁴⁵ See the EUIPO study on dynamic blocking injunctions in the European Union, EUIPO, March 2021; EUIPO Live event piracy discussion paper, *Challenges and good practices from online intermediaries to prevent the use of their services for live event piracy*, March 2023.

provided for, forward-looking, catalogue-wide and dynamic injunctions can be an effective means to prevent the continuation of an IPR infringement⁴⁶. Dynamic injunctions refer to injunctions that can be extended to enable the blocking of other services providing access to unauthorised retransmission even in those cases where they were not identified at the time of issuing the injunction, as long as they concern the same event(s).

The Recommendation encourages Member States to adopt such dynamic injunctions, accompanied by the necessary safeguards. It also recommends certain specific actions by Member States as regards the remedies applicable to sports event organisers.

The sub-sections below provide an assessment of the progress made by Member States in implementing these recommendations.

A. Legal standing for sports event organisers

Paragraph (8) of the Recommendation encourages Member States to assess whether sports event organisers are entitled to take legal action to prevent or prohibit unauthorised retransmission of live sports events; where this is not the case, they are encouraged to grant them legal standing.

Before the adoption of the Recommendation, some Member States already provided the possibility for sports event organisers to take legal action through different legal mechanisms, depending on the jurisdiction⁴⁷.

In France⁴⁸ for instance, sports event organisers, broadcasters, and professional sports leagues are entitled to ask in court for measures to prevent access to services that retransmit sports competitions or events without authorisation. According to some stakeholders, this possibility has proven very effective to stop unauthorised retransmissions, including during the Paris 2024 Olympic Games⁴⁹. In other Member States, sports event organisers do not have an express recognition of their legal standing, but they are nonetheless allowed to obtain injunctions through other mechanisms at national level⁵⁰. In many countries, sports organisers are only able to enforce their rights through related rights on the broadcasts of the sports events or domiciliary rights⁵¹.

⁴⁶ Communication from the Commission to the Institutions on ‘Guidance on certain aspects of Directive 2004/48/EC of the European Parliament and of the Council on the enforcement of intellectual property rights’, COM(2017) 708 final.

⁴⁷ For example, in Bulgaria, France, Greece, Hungary, Italy, Romania, Slovakia and Spain. See the ‘Mapping report on national remedies against online piracy of sports content’, European Audiovisual Observatory, Strasbourg, 2021. In Portugal, under Law No. 82/2021 of 30 November, organisers and producers of sports events can seek a blocking injunction regarding unauthorised retransmission of a live sports event.

⁴⁸ Code du Sport – Section 3 on combating illegal retransmission of sporting events and competitions, Article L333-10.

⁴⁹ Feedback received in the context of the call for evidence from rightholders, including sports event organisers.

⁵⁰ This is the case in Italy, Spain and Denmark.

⁵¹ ‘Domiciliary rights’ or ‘house rights’ are rights related to the stadium or venue that sports event organisers often enjoy and ‘which in practice give them the possibility to take legal action for unauthorised access to their premises or for the breach of contractual obligations prohibiting the filming, recording, or broadcasting of the event’ (see [Mapping report on national remedies against online piracy of sports content](#), European Audiovisual Observatory, Strasbourg, 2021).

A development since the adoption of the Recommendation is the introduction in Greece, in February 2025, of an explicit legal standing for sports event organisers. Greek law⁵² now provides sports events organisers with the possibility to submit an application for termination of infringement before the competent authority⁵³ stating the imminent infringement of the rights granted to them.

B. Dynamic nature of the injunctions

Under paragraphs (12) and (26) of the Recommendation, Member States are encouraged to use dynamic injunctions to enable the extension of the blocking of pirate services to new domains and mirror sites concerning the same live events.

Before the adoption of the Recommendation, some Member States had already used dynamic injunctions through court orders specifically to address the evolving threat of online piracy⁵⁴. Other Member States rely on hybrid models consisting in a judicial process combined with intervention of an administrative authority. This system is implemented in countries such as Greece⁵⁵, Italy⁵⁶, Spain⁵⁷, France⁵⁸ or Lithuania⁵⁹. In addition, some Member States may rely on independent bodies to block infringing sites. For instance, Germany relies on a self-regulatory body⁶⁰ founded by internet access providers and rightholders that is dedicated to implement DNS blocking of structurally copyright infringing websites.

To ensure blocking orders remain effective for live events, some Member States have introduced specific measures for ‘live blocking injunctions’⁶¹. These measures consist in blocking the infringing site only for the duration of a live event or series of recurring live events (such as a football season or a tennis competition)⁶².

Since the adoption of the Recommendation, some Member States have started to reassess their legal frameworks or have initiated policy discussions to strengthen enforcement measures, in particular for live events. Belgium introduced a hybrid system, in force since 1 June 2024, and

⁵² Article 66E paragraph 10A of Law 2121/1993, as amended by Law 5179/2025.

⁵³ The Committee for the Notification of Copyright and Related Rights Infringement on the Internet (EDPPI).

⁵⁴ In countries such as Ireland, the Netherlands or Denmark, the courts have already granted dynamic injunctions to rightholders and sports holders of rights. See ‘*Dynamic blocking injunctions in the European Union*’, EUIPO, March 2021.

⁵⁵ In Greece, the Committee for the Notification of Copyright and Related Rights Infringement on the Internet (EDPPI) is entrusted with an administrative procedure that allows both traditional blocking and a live blocking for sport and cultural events. Following an amendment to the Law in 2025, the procedure extends to all audiovisual works and not only sports and cultural events.

⁵⁶ In Italy, the Communications Regulatory Authority (AGCOM) has the power to issue blocking orders against infringing platforms, while courts continue to adjudicate complex or contested cases.

⁵⁷ In Spain, the Second Section of the Committee of Intellectual Property has also been entrusted with powers to issue dynamic injunctions.

⁵⁸ In France, ARCOM is the administrative authority in charge of updating the court orders.

⁵⁹ The Radio and Television Commission of Lithuania is the national regulator responsible for radio and audiovisual media services. It can issue blocking orders, including dynamic blocking orders.

⁶⁰ The Clearing Body for Copyright on the Internet (CUII).

⁶¹ In Portugal, the introduction of a live blocking procedure allows the Inspectorate General for Cultural Activities (IGAC) to order the blocking of infringing content.

⁶² See EUIPO Live event piracy discussion paper: *Challenges and good practices from online intermediaries to prevent the use of their services for live event piracy*, EUIPO, March 2023.

created for this purpose a new administrative authority⁶³. This authority issued its first decision⁶⁴ in April 2025, whereby it requested different intermediaries to block over 130 URLs providing access to illegal sports content. In Latvia, amendments to the Copyright Law were made in December 2024 to empower an administrative authority to monitor the use of copyright protected content in the online environment by restricting access to copyright infringing websites⁶⁵. In France, a new legislative proposal put forward earlier this year provides for temporary blocking orders⁶⁶ updated through a technical tool that would be supervised by ARCOM⁶⁷.

From the discussions in the meetings of the dedicated network, it emerges that discussions on the possible introduction of dynamic injunctions have been launched in a few other Member States but have not materialised yet. In other Member States however, there have been no developments in the field, prompting concerns from certain stakeholders.

To support the functioning of dynamic injunctions, some Member States, such as Italy, Portugal, Lithuania and Greece, have introduced technical tools to support the blocking of infringing sites. Using automated systems to update and monitor orders can be an effective means of tackling infringing live content, which requires quick action. These tools must however be accompanied by the necessary safeguards, as set out in the Recommendation. In Italy, dynamic injunctions can be issued by AGCOM via a technical tool called *Piracy Shield* after rightholders submit a request, providing proof of ownership of the content and of its infringement. Greece has also put in place a technical tool to monitor and follow-up on the blocking of live events, with separate procedures for dynamic blocking and live event blocking⁶⁸. Moreover, in 2025, Greece adopted legislation to extend the scope of the mechanism to cover all audiovisual works.

The EUIPO data collection exercise (see table 1 below), which seven Member States contributed to in 2024 and six Member States in 2025⁶⁹, indicates that dynamic injunctions are widely used in countries where they are available, suggesting that they provide an effective remedy against piracy of live events.

⁶³ The Belgian Office for combatting online piracy and illegal gambling (BAPO) is an administrative authority created to monitor and implement judicial orders relating to clear and substantial infringement of copyright, a neighbouring right, or the rights of a database producer, committed online. It is also competent to update the list of all the blocked sites. See further information on [Online piracy | FPS Economy](#).

⁶⁴ Decision by the Belgian Office for combatting online piracy and illegal gambling of April 1, 2025 concerning order rr/25/00020. [Decision-250401-BAPO-D-FR-001-EN.pdf](#)

⁶⁵ Amendment to the Copyright Act of 12 December 2024, published in Latvijas Vēstnesis, 251, 28.12.2024. See also IRIS Legal Observations of the European Audiovisual Observatory, [IRIS 2025-2:1/19](#)

⁶⁶ The proposed mechanism ensures a temporary blocking whereby IP blocking orders are updated in real time during the retransmission of a live sports event and are suspended once the sport event ends. This new mechanism would entail the introduction of an automated platform that would be monitored by ARCOM.

⁶⁷ Proposition de loi relative à l'organisation, à la gestion et au financement du sport professionnel, Texte n° 456 (2024-2025) submitted to the French Senate on 18 March 2025.

⁶⁸ In the dynamic injunction procedure, mirror or clone sites can be blocked for preventing the circumvention of the main order. In live event blocking, which takes place before the event goes live, three main conditions need to be fulfilled (i) the blocking is only instituted for an event that is transmitted live; (ii) large-scale infringement is demonstrated or very likely to occur; (iii) there must be an immediate, serious and imminent danger or an irreparable damage to right holders, which also has a bearing on public interest.

⁶⁹ See EUIPO Report.

Table 1 Number of dynamic injunctions and resulting domain names/IP addresses blocked in Member States

Year	Number of dynamic injunctions issued in Member States participating to monitoring exercise	Number of IP addresses/domains blocked (as a result of the dynamic injunction)
2024	2387 (in 7 MS)	41720
First half of 2025	579 (in 6 MS)	35542

C. New addressees of injunctions

Recital 30 of the Recommendation acknowledges that, while injunctions are typically directed at internet access providers, as they can block access to services offering unauthorised retransmissions of live events, other providers of intermediary services may be misused to enable such retransmissions or to circumvent blocking measures. This may be the case of, for instance, CDNs and reverse proxies which can be used to obfuscate the origin of the unauthorised retransmissions, or alternative DNS resolvers and proxy services, such as Virtual Private Networks (VPNs) which may be used to facilitate access to services that have been blocked.

In view of this, paragraph (9) of the Recommendation encourages Member States to provide for injunctions also against those intermediaries, who, regardless of their lack of liability, offer services that are misused by third parties for illegal retransmissions of live (sports) events. In this regard, the DSA clarifies that, although some intermediary services may be exempted from liability under the DSA, it does not prevent them from being addressees of injunctions, in particular orders by courts or administrative authorities requiring the removal of illegal content or the disabling of access to it⁷⁰.

Information gathered for the purpose of this assessment shows that the evolution of piracy trends and new intermediaries involved or misused for online piracy have led some national courts to expand the addressees of injunctions beyond internet access providers, by including search engines, CDNs, VPNs or illegal IPTV services.

For example, French courts have recently targeted intermediaries other than internet access providers. Following injunctions in 2024 targeting alternative DNS providers, and in 2025 CDNs and proxy services, new rulings from the Paris Judicial Court have recently extended the scope of injunctions to VPNs, and illegal IPTV services⁷¹. In Spain, sports event organisers obtained a dynamic blocking injunction against ISPs and CDNs in the *La Liga/Telefonica* case⁷². In Italy, AGCOM's injunctions are to be implemented also by intermediaries, such as VPNs and publicly available DNS resolvers, search engine operators and any other ISPs

⁷⁰ See recital 25 of the DSA.

⁷¹ See Case 24/14722, *Tribunal judiciaire de Paris*, 15 May 2025; Case 25/07645, *Tribunal judiciaire de Paris*, 10 July 2025; Case 25/05968, *Tribunal judiciaire de Paris*, 18 July 2025.

⁷² See *LaLiga/Telefonica*, *Juzgado de Barcelona*, 18 December 2024, SJM B 309/2024 - ECLI:ES:JMB:2024:309; [Consejo General del Poder Judicial: Buscador de contenidos](#)

involved in any way in providing access to illegal websites or services. Finally, the mentioned recent Belgian decision (see above) targeted also DNS resolvers⁷³.

As these are recent developments, there is not yet sufficient data to assess the efficiency of dynamic injunctions addressed to those intermediaries.

D. Safeguards applicable to injunctions

As indicated in paragraph (2) and recital 16, the Recommendation does not apply to any legitimate use of content, such as the use of copyright-protected content under limitations and exceptions⁷⁴ and the use of short extracts done in line with Article 15 of Directive 2010/13/EU. Paragraph (15) and following of the Recommendation emphasise the importance of implementing robust safeguards to protect fundamental rights when issuing injunctions to combat piracy of live events. These safeguards aim to balance the effective enforcement of intellectual property rights with the protection of users' fundamental rights.

Accordingly, the Recommendation advocates proportionate and targeted measures, in line with the case-law of the Court of Justice of the EU (CJEU)⁷⁵. In particular, in Case C-314/12 *Telekabel*,⁷⁶ the CJEU stated that the measures adopted by ISPs must be 'strictly targeted, in the sense that they must serve to bring an end to a third party's infringement of copyright or of a related right but without thereby affecting internet users who are using the provider's services in order to lawfully access information'. The Recommendation also indicates that the application of such measures should not impose excessive obligations on intermediaries or lead to general monitoring.

While the purpose of this assessment is not to assess the compliance of the systems and procedures in place in Member States, the monitoring exercise has made it possible to identify specific measures taken to ensure that the injunctions issued are accompanied by the necessary safeguards related to proportionality and respect for fundamental rights. For instance, authorities may limit the duration of the blocking measure to the duration of the event or the infringement. For technical tools used to support blocking orders, important safeguards include: the requirement for the applicant to provide enough evidence on the infringement; the use of 'whitelists' of sites that may not be blocked; and the setting of specific deadlines to unblock sites once the initial infringement has been remedied or in cases of erroneous blocking⁷⁷.

Overall, having the necessary safeguards in place reduces the risks associated to the use of certain blocking measures, ensuring that such measures do not lead to unintended

⁷³ Decision by the Belgian Office for combatting online piracy and illegal gambling of 1 April 2025 concerning order RR/25/00020. [Decision-250401-BAPO-D-FR-001-EN.pdf](#)

⁷⁴ Under the Infosoc Directive, or Directive (EU) 2019/790 of the European Parliament and of 17 April 2019 on copyright and related rights in the Digital Single Market.

⁷⁵ See paragraphs (18) and (19) of the Recommendation.

⁷⁶ Case C-314/12 *UPC Telekabel Wien GmbH v Constantin Film Verleih GmbH, Wega Filmproduktionsgesellschaft mbH* of 27 March 2014; ECLI:EU:C:2014:192, paragraph.56

⁷⁷ See EUIPO report.

consequences, such as restrictions to legal content, as mentioned by some respondents to the call for evidence⁷⁸.

As mentioned in recital 24 of the Recommendation, different technical measures may be used to implement blocking injunctions, for example through DNS or IP blocking. The risks of over-blocking may be higher when implementing blocking of IP addresses, since the number of websites connected to one specific IP address can vary. It is therefore important to ensure that the safeguards are adapted to the type of technical measures implemented. More generally, the proportionality and effectiveness of the measures should be monitored at national level to avoid unintended consequences, in accordance with Regulation (EU) 2015/2120⁷⁹. Additionally, any decision taken by a national authority may be subject to judicial review by the competent court⁸⁰.

In this context, some stakeholders, including a number of end-users, have complained about a few instances of over-blocking⁸¹, in particular in relation to the implementation of the *Piracy Shield* tool in Italy and the blocking injunction issued in the *Laliga/Telefonica*⁸² case in Spain. Those cases have raised discussions on the safeguards in place⁸³.

Overall, the available information suggests that the number of reported incidents related to the blocking of legitimate content appears to be very limited compared with the total number of dynamic injunctions issued following the adoption of the Recommendation.

E. Overall assessment

National developments demonstrate increasing recognition among Member States of the need to strengthen enforcement tools to tackle online piracy. In the absence of other remedies targeted at direct infringers, the use of dynamic injunctions accompanied by the necessary safeguards has proven to be an efficient means of stopping and preventing repeated

⁷⁸ Live event piracy discussion paper: *Challenges and good practices from online intermediaries to prevent the use of their services for live event piracy*, EUIPO, March 2023.

⁷⁹ Regulation (EU) 2015/2120 of the European Parliament and of the Council of 25 November 2015 laying down measures concerning open internet access and amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services and Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union ('the Open Internet Regulation'). The Open Internet Regulation guarantees that end-users shall have the right to access and distribute information and content, use and provide applications and services, and use terminal equipment of their choice, irrespective of the end-user's or provider's location or the location, origin or destination of the information, content, application or service, via their internet access service. Providers of internet access services shall treat all traffic equally, when providing internet access services, without discrimination, restriction or interference, and irrespective of the sender and receiver, the content accessed or distributed, the applications or services used or provided, or the terminal equipment used. National regulatory authorities shall closely monitor and ensure compliance with these requirements and shall promote the continued availability of non-discriminatory internet access services at levels of quality that reflect advances in technology.

⁸⁰ See also recital 28 of the Recommendation.

⁸¹ In the context of the monitoring exercise, two national authorities reported instances of wrongful blocking or overblocking. see EUIPO report.

⁸² See the *LaLiga/Telefonica case*, *Juzgado de Barcelona*, 18 December 2024, SJM B 309/2024 - ECLI:ES:JMB:2024:309; [Consejo General del Poder Judicial: Buscador de contenidos](#)

⁸³ See the latest AGCOM draft resolution amending the regulation on the protection of copyright in electronic communications networks, which was notified to the Commission under the Technical Regulations Information System (TRIS) procedure (Notification 2025/0148/IT).

infringements⁸⁴, as shown by the data collected through the EUIPO's monitoring exercise and the feedback collected through the call for evidence.

As indicated above, the implementation of dynamic injunctions, in particular addressing live events, is very diverse across the EU. Some Member States have put in place comprehensive measures to tackle unauthorised retransmissions of live events, while other countries have taken limited or have not taken any measures in this respect. Member States where dynamic injunctions are in place consider them necessary to tackle online piracy in a rapidly developing environment. However, a key aspect is ensuring the rapid implementation of such injunctions while also guaranteeing the correct application of safeguards.

Feedback from rightholders in response to the call for evidence and discussions with Member States during dedicated network meetings suggest that Member States with hybrid systems — combining judicial and administrative mechanisms — are effective in addressing repeated infringements. Rightholders pointed out that even faster systems are needed, supported by automated tools, and that injunctions should be recognised across borders to increase their effectiveness. They also consider that injunctions should be accompanied by additional measures to be more effective, such as enhanced cooperation with intermediaries.

Due to the differences in the regulatory frameworks across Member States, several stakeholders, including national authorities and rightholders, are calling for legislation to harmonise the application and enforcement of dynamic injunctions at EU level. They argue that the lack of uniform enforcement system undermines the overall efficacy of the current rules.

On the other hand, some intermediaries that responded to the call for evidence⁸⁵ argue that blocking injunctions should not be used as the primary tool against piracy, as they may be easily circumvented technically and may not be accurate enough. They consider that the focus should be on alternative approaches such as increased cooperation among the relevant market players, law enforcers and national authorities, and on informing users about legal alternatives. Other intermediaries⁸⁶ consider that blocking measures must always be supported by a judicial order and monitored by the courts or by competent administrative authorities, and that the approach should be based on solid safeguards to protect legitimate content.

Citizens that responded to the call for evidence advocate for evidence-based and proportionate responses that prioritise accessibility, fair and affordable pricing of legal offers. They also highlight the need to balance the protection of intellectual property rights with the protection of other fundamental rights, such as freedom of information, when adopting technical measures to block access to illegal content.

⁸⁴ See EUIPO Study on dynamic blocking injunctions in the European Union, EUIPO, March 2021; EUIPO Live event piracy discussion paper, *Challenges and good practices from online intermediaries to prevent the use of their services for live event piracy*, March 2023.

⁸⁵ Feedback received in the context of the call for evidence.

⁸⁶ Feedback received in the context of the call for evidence from internet access providers.

6. COOPERATION

A. Cooperation between holders of rights and providers of intermediary services

Paragraphs (7) and (25) of the Recommendation encourage cooperation between rightholders and providers of intermediary services to facilitate the identification of the source of the unauthorised retransmissions and to take specific measures against repeated misuse of intermediary services⁸⁷.

Several cooperation agreements exist between rightholders and internet access providers, whether concluded between market players (for example in Sweden)⁸⁸, or supported by the intervention of a public authority (for example in Denmark⁸⁹, France⁹⁰ and Spain⁹¹). Bilateral cooperation agreements have also been concluded between individual rightholders and several types of intermediaries. For instance, in the responses to the call for evidence, one rightholder reported having concluded up to 12 agreements with hosting services, DSPs and CDNs aimed at ensuring the timely removal of or disabling access to illegal content⁹².

During the data collection exercises conducted by the EUIPO, under KPI 2.2, participating rightholders reported that, in 2024, they had entered into 49 voluntary cooperation agreements with intermediaries: 25 with DSPs, 17 with online platforms and 7 with other intermediaries (2 cloud services provider, 2 other hosting providers, 3 CDN and proxy services providers). The number of cooperation agreements in place reported by rightholders in 2025 rose to 62 (42 with DSPs, 18 with online platforms and 2 with a service seeking to identify the source of infringements). Additional cooperation agreements with payment services or advertisers were also mentioned under KPI 2.3.

Data submitted during the monitoring exercise moreover show that the majority of notices which resulted in the suspension of access to the illegal retransmission were issued in the

⁸⁷ Recital 22 clarifies that providers of intermediary services upstream in the internet infrastructure such as CDNs or reverse proxies, which can often be the only services identified by rightholders when they detect unauthorised retransmission, should be encouraged to share information on the identification of the sources of the unauthorised retransmissions, including, when appropriate, the origin IP address of the servers. Furthermore, recital 30 refers to possible voluntary measures that could be taken by alternative DNS resolvers and proxy services such as VPNs to prevent their services from being misused (for example to facilitate access to services that have been blocked).

⁸⁸ A voluntary agreement has been in place since 2022 between rightholders and Swedish internet service providers, to streamline the handling and implementation of decisions on blocking injunctions. The text of this agreement can be consulted here: [Microsoft Word - Branschöverenskommelse.docx](#).

⁸⁹ In Denmark, the ‘Share With Care (SWC) initiative’, was born in 2022 out of a collaboration between Danish Rights Alliance, the Danish Ministry of Culture and the Danish Telecom Industry Association. The parties have established a Code of Conduct for the handling of decisions regarding the blocking of access to infringing services See: [Share With Care | RettighedsAlliancen](#).

⁹⁰ In France, a voluntary agreement has been signed in 2023 with the support of ARCOM between the Fédération Française des Télécoms (FFTélécoms), and the Sports rightholder group Association pour la protection des programmes sportifs (APPS). For more details see: <https://www.arcom.fr/presse/signature-de-laccord-entre-les-fournisseurs-daccés-internet-et-les-titulaires-de-droits-sportifs-visant-protéger-les-retransmissions-sportives>.

⁹¹ In Spain, in 2021 the “Protocolo para el refuerzo de la protección de los derechos de propiedad intelectual” was signed between Spanish internet access providers and rightholders, with the agreement of the Spanish Ministry of Culture and Sport. For reference see: [La Moncloa. 08/04/2021. Rodríguez Uribe: "Una correcta protección de los derechos de los creadores es una garantía fundamental para un ecosistema cultural rico e innovador" \[Prensa/Actualidad/Cultural\]](#)

⁹² Feedback received in the context of the call for evidence.

context of cooperation agreements⁹³. Some intermediaries, notably online platforms, have put in place voluntary cross-industry cooperations with rightholders and developed specific tools and measures which can be deployed to combat IP infringement on their services⁹⁴. In particular, some online platforms, in the responses to the call for evidence, stated that the measures taken to fight live event piracy included preventing newly created accounts from engaging in live streaming⁹⁵, and, in certain specific cases, banning the accounts of repeat infringers⁹⁶. Overall, online platforms consider that the existing voluntary cooperation with rightholders provides an effective path to continue addressing piracy of live events.

However, some rightholders who responded to the call for evidence indicated that most cooperation agreements still rely on non-automated processing of notices, which limits their effectiveness in the case of live events. Several rightholders also highlighted that certain intermediaries who are not subject to notice and action obligations under the DSA are still reluctant to engage in voluntary cooperation.

The importance of cooperation was also acknowledged by other intermediaries, particularly by ISPs, whose submissions to the call for evidence underlined how collaborative approaches between rightholders and intermediaries are more effective, less costly and less time consuming than court orders. Some respondents, including rightholders and intermediaries, consider that cooperation agreements can be useful when they can count on the mediating role of a national competent authority, as this promotes constructive dialogue⁹⁷.

B. Cooperation between public authorities

Given the nature of unauthorised retransmissions of live events, which often take place cross-border, more effective cooperation among competent authorities in the different Member States is an important step in tackling live event piracy more efficiently.

Paragraph (36) of the Recommendation encourages Member States to actively engage in the exchange of information about the services access to which has been blocked in their territory on the basis of an injunction. Moreover, under Article 9(4) of the DSA, when a judicial or administrative authority of a Member State issues an order to act against illegal content that meets the established requirements, the Digital Services Coordinator (DSC) of that Member State must, upon receiving the order and without undue delay, transmit a copy of it to all other DSCs through the system set up in accordance with Article 85 of the DSA. According to the information collected through the dedicated network, this information sharing system, which is directly relevant for live event piracy, is not fully operational yet. This is likely due to the delay in the full uptake of the system for information exchange (AGORA) on orders pursuant to Articles 9 and 10 of the DSA, the use of which is likely to increase in the short to medium-term.

⁹³ For 2024, the data collected during the monitoring shows that, for the notices sent through cooperation agreements, 55% resulted in a suspension. For the first half of 2025, 87% of the notices sent via cooperation agreements led to suspensions.

⁹⁴ EUIPO report.

⁹⁵ Feedback received in the context of the call for evidence.

⁹⁶ Feedback received in the context of the call for evidence.

⁹⁷ Feedback received in the context of the call for evidence.

The vast majority of Member States' authorities have shown a strong interest in exchanging information within the dedicated network. The network has proven to be a crucial initiative, enabling participating authorities to exchange valuable information on their best practices for curbing live event piracy, and share their expertise and developed resources with other members of the network⁹⁸. Certain Member States, subsequently to the meetings held in the context of the network, organised bilateral meetings to exchange further information on the respective systems, good practices and the challenges they have faced in the course of their mandates. In addition, some public authorities have engaged in public-private sector cooperation. ARCOM, for example, has cooperated with the International Olympic Committee (IOC). In its efforts to prevent illegal retransmissions of Olympic sporting events, the IOC put in place a comprehensive programme for the 2024 Paris Olympic Games, which included multiple cooperation agreements, including with intermediary services and social media platforms, specifically to address live event piracy⁹⁹.

At the dedicated network meetings, some Member States who are contributing to the WIPO Alert¹⁰⁰ platform, an initiative launched and hosted by the World Intellectual Property Organisation (WIPO), also raised the possibility of creating a similar initiative at EU level. This would allow in their view for the quick circulation of information concerning blocked domain names and other internet locations, such as IP addresses, to which access is being restricted in their jurisdictions. This was echoed by calls from a majority of Member States to strengthen their cooperation beyond the network meetings. In their reply to the call for evidence, certain public authorities called for measures which would allow national authorities to share evidence of copyright infringements. Some rightholders also supported the idea of wide-ranging and stronger enforcement across borders, including the recognition of judicial orders issued under the jurisdiction of a different Member State, to strengthen the response to online piracy and reduce the fragmentation that limits the effectiveness of enforcement measures¹⁰¹.

7. RAISING AWARENESS AND ENHANCING THE AVAILABILITY OF COMMERCIAL OFFERS

Paragraph (34) of the Recommendation underlines the importance of raising users' awareness of the availability of legal offers. It also encourages holders of rights in transmissions of live events to increase the availability, affordability, and attractiveness of their commercial offers to end users across the EU.

⁹⁸ For example, the Lithuanian Radio and Television Commission (LRTK), curates a list of blocked domain names within their jurisdiction by the competent Lithuanian court and makes it available to the public. The list can be freely consulted at this address: [Copyright Infringement Websites | Lithuanian Radio and Television Commission](#)

⁹⁹ Feedback received in the context of the call for evidence.

¹⁰⁰ Launched in 2019, WIPO ALERT is a secure online platform on which national authorities that have registered and signed up for this scheme can upload and update lists of copyright-infringing web sites. Advertisers, advertising agencies and intermediaries can register as authorised users and download these lists. The platform is not publicly available but requires registration and authentication. The service enables a global view of infringing sites, including sites in languages which might otherwise be overlooked. The platform strengthens the practical basis for the advertising industry self-regulation. Currently, five EU Member States contribute to the WIPO Alert platform.

¹⁰¹ Feedback received in the context of the call for evidence.

A. Availability, affordability and attractiveness of commercial offers

The submissions to the Observatory data collection exercise focused solely on the availability, affordability and attractiveness of sports events transmissions and hence no data are available on other live events¹⁰².

According to the data received, sports event organisers typically grant between 1 and 5 licences per event to broadcasters, within a reported territory, and there are usually between 1 to 2 distribution channels per event, with limited exceptions¹⁰³. These distribution channels include usually Pay TV or subscription-based streaming services, with free-to-air offers also available on certain occasions. Licences to public broadcasters were reported in one case.

Feedback from the call for evidence shows that several rightholders and sports event organisers have made efforts to make their offers more accessible, for example by introducing ‘freemium’ offers (where content is made available without a paid subscription) and Free Ad Supported TV (FAST channels)¹⁰⁴. They have also set up a website which allows users to obtain information on where a specific sporting competition is available¹⁰⁵.

However, the data submitted by sports event organisers and rightholders to the EUIPO does not allow to fully assess the progress made in terms of the availability of sports events or the affordability and attractiveness of commercial offers. Consumers responding to the call for evidence consider that this remains an area of concern, arguing that the availability of affordable legal offers remains low and legal offers are fragmented¹⁰⁶. In a survey conducted in France in 2023, 19% of respondents admitted using illicit sources to access live sports, citing cost and fragmentation of commercial offers (57%) as the main reasons. Among those who responded that they are watching live events via unauthorised retransmissions, 65% reported already having a subscription to at least one legal offer for sport content¹⁰⁷. Some national authorities responding to the Observatory monitoring exercise highlighted pricing of available legal offers, together with fragmentation and territorial availability, as possible obstacles faced by users seeking to access legal offers of live content, which often requires users to obtain multiple paid subscriptions.

Rightholders and sports event organisers argue that, despite the efforts made to increase the availability of legal offers, competition with unauthorised retransmissions, which are usually free to consume, cannot be considered to take place on fair terms. They point out that unauthorised retransmissions also occur when a live event is available on free-to-air channels, for example, during the Olympic Games¹⁰⁸. Other contributions have highlighted that the visibility of legal access to live content needs to be expanded further, for example through

¹⁰² Five Broadcasters provided data for volleyball, boxing, handball, basketball, motorsports, tennis, hockey, rugby, futsal and football for their respective territories of operation. The broadcasted events were national, European, regional and world championships.

¹⁰³ EUIPO report. Overall, within the monitoring, sports organisers reported on 701 broadcasted competitions. The majority were licensed to one or two broadcasters (in total 65% and 30% respectively of all competitions).

¹⁰⁴ Feedback received in the context of the call for evidence.

¹⁰⁵ For more information, please see the website made available here by the Sports Rights Owners Coalition: [Sports Rights Owner Coalition – The Voice of Sporting events](#)

¹⁰⁶ Feedback received in the context of the call for evidence.

¹⁰⁷ ARCOM, [Baromètre de la consommation de programmes sportifs](#), published in May 2024.

¹⁰⁸ Feedback received in the context of the call for evidence.

cooperation between rightholders and ISPs, including via verified domain labelling or promotion on platforms that serve the end users directly¹⁰⁹.

B. Awareness raising activities by Member States

Several national authorities are actively engaged in initiatives that contribute to raising awareness of legal offers and the negative consequences of online piracy.

From information gathered via the EUIPO data collection exercise and the dedicated network meetings, it appears that educational activities have been conducted in several Member States. For example, Greece has launched a project named ‘Copyright school’¹¹⁰, run in cooperation with the Ministry of Education, aimed at providing an educational and training platform for students, teachers and parents and explaining the negative effects of piracy. Specific modules have been introduced in school curricula in Romania and Slovenia to raise pupils’ awareness of piracy. Rightholders have called for the introduction of similar campaigns into the school curricula of other Member States¹¹¹.

Regarding awareness raising activities targeted to the general public, in 2023 Spain launched a campaign titled ‘Me gusta, lo pago’ (‘I like it, I pay for it’)¹¹², to raise awareness of the need to respect intellectual property rights and promote access to legal and safe content. Similar efforts to curb public consumption of pirated material, targeted specifically at sports events, were made in France by rightholders, with the support of ARCOM, in 2024¹¹³.

Several Member States reported using dedicated portals to provide information on available legal offers. Additionally, some national authorities compile ‘blacklists’ of websites that make available copyright infringing content and ‘whitelists’ of services which are instead referenced as providing access to protected content legally¹¹⁴. In other Member States users trying to access blocked websites are informed about the reasons for the blocking and re-directed to legal offers options¹¹⁵. These initiatives play an essential role in raising awareness about the respect of copyright and related rights, and about the risks and consequences connected with accessing copyright protected content illegally¹¹⁶. This combination of website-blocking combined with awareness raising is considered as a successful model¹¹⁷.

The Recommendation refers to *Agorateka*, the already cited European online content portal, developed by the EUIPO Observatory, which helps consumers identify legal offers in

¹⁰⁹ Feedback received in the context of the call for evidence from a coalition of intermediaries.

¹¹⁰ [Home - copyrightschool](#)

¹¹¹ Feedback received in the context of the call for evidence.

¹¹² [El Ministerio de Cultura y Deporte lanza la campaña de lucha contra la piratería ‘Me gusta, lo pago’ | Ministerio de Cultura](#)

¹¹³ In June 2024, the Audiovisual Anti-Piracy Alliance launched the "Protège ton sport" raising awareness campaign, produced with the support of ARCOM. See also: [Fight against sports piracy | Arcom](#)

¹¹⁴ See EUIPO report. An example of whitelist can be consulted at: <https://www.arcom.fr/sites-plateformes>

¹¹⁵ See EUIPO report.

¹¹⁶ There are several risks associated with using and accessing illegal services, including exposure of users to malware, as well as data theft. Associations such as the Danish Right Alliance have also launched initiatives aimed at raising the awareness of users to this type of risks connected with online piracy. See, for example, the ‘Os der elsker film’ (‘Us Who Love Movies’) campaign launched in 2025: <https://www.youtube.com/watch?v=GbpnCivb2g8>.

¹¹⁷ See Study on the effectiveness and the legal and technical means of implementing website-blocking orders, December 2024, available at: [wipo_ace_17_13.pdf](#)

participating European countries. Following the adoption of the Recommendation and the work that took place during the dedicated network meetings, additional portals on legal offers have been connected to *Agorateka*, with Bulgaria joining *Agorateka* in 2024, and Slovenia and Croatia in 2025, bringing the total of participating Member States to 25.

Finally, several stakeholders responding to the call for evidence consider that the adoption of the Recommendation has helped put in the spotlight the importance of the fight against the unauthorised retransmission of sports and other live events¹¹⁸.

8. CONCLUSIONS

Overall, the assessment shows that the Recommendation has had positive effects by prompting action from certain stakeholders and Member States. Nonetheless, given its non-binding nature, these effects have been limited and have not allowed to significantly curb the volume of online piracy of live events.

There has been limited improvement in the prompt treatment of notices relating to live events. While the processing of notices by online platforms seems to be effective, also due to the entry into force of the DSA, a significant number of notices relating to unauthorised live retransmissions have been sent to other hosting service providers (DSPs) that lag far behind online platforms when it comes to suspending illegal retransmissions. In addition, an increasing number of notices are being addressed to other intermediaries, including CDNs and reverse proxies, which are not subject to the DSA rules on notices. In this context, the assessment underlines that cooperation agreements have led to a better and quicker response by the relevant intermediaries.

On the implementation and use of dynamic injunctions by Member States, the assessment reveals a mixed picture. Some Member States can count on advanced systems for the implementation of dynamic injunctions, which have proven to be an effective tool to stop and prevent repeated infringements. Other Member States lack any such mechanisms. Yet, since the adoption of the Recommendation, national debates on introducing and applying dynamic injunctions have intensified, with some Member States taking effective measures while providing safeguards to avoid overblocking.

Several voluntary cooperation agreements have been concluded between rightholders and intermediaries since the adoption of the Recommendation. However, the reluctance of certain intermediaries to cooperate with rightholders in addressing online piracy remains an area of concern. As to the cooperation among public authorities, the establishment of the dedicated network is seen as a positive development. National authorities are willing to continue such cooperation and explore opportunities for a more structured exchange of information, including on the services that have been blocked at national level.

Awareness-raising activities undertaken by several Member States have contributed to better informing users on the effects of piracy and directing them to legal offers. Despite the efforts reported by rightholders to make commercial offers more accessible through different channels, consumers and other stakeholders consider that legal offers should be expanded and made more affordable.

¹¹⁸ Feedback received in the context of the call for evidence from rightholders.

The full application of the DSA as of February 2024 has provided a robust legal framework supporting the fight against illegal content online, in particular by harmonising the rules on notices. Its recent implementation, however, does not allow to conclude on its impact on piracy of live events. For example, the full assessment of the trusted flaggers mechanism will be possible once trusted flaggers begin to submit annual reports on the notices submitted, including on the action taken by the platforms. The DSA can further contribute to the fight against live event piracy, and copyright infringements more broadly, in particular through the Working Group set up by the European Board for Digital Services (‘the DSA Board’) and dedicated, among other matters, to intellectual property rights issues. Furthermore, the DSA Board examines how the enforcement of the DSA rules across the EU can contribute effectively to combating online IP infringements, including online piracy, and has held dedicated discussions to that end¹¹⁹.

This assessment demonstrates that the Recommendation has contributed to advancing efforts to combat piracy of live events. It is therefore essential that all relevant stakeholders continue to pursue the actions encouraged in the Recommendation. In addition, the work undertaken by the EUIPO Observatory since the adoption of the Recommendation, in particular the monitoring of the Recommendation and the cooperation with Member States through the dedicated network, has been instrumental in tracking progress in the fight against live event piracy at both national and EU level. This framework remains vital and should be maintained.

While this assessment shows that some progress has been achieved in the fight against live event piracy, there is at the same time an overall stagnant level of web-based piracy alongside piracy through illegal IPTV. In light of the above, the Commission will examine the areas for possible further action to better address the piracy of live events at EU level. It will consider further the contribution of different online intermediaries to the fight against online piracy in the context of the discussions in the DSA Board and its working groups. The Commission will also explore whether new measures are needed to ensure a wider and more consistent use of dynamic injunctions across Member States and a more systematic cross-border cooperation among national authorities.

¹¹⁹ [European Board for Digital Services | Shaping Europe’s digital future.](#)