

# Public consultation on the evaluation and modernisation of the legal framework for the enforcement of intellectual property rights: Intermediaries

Fields marked with \* are mandatory.

## Objectives and General Information

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The views expressed in this public consultation document may not be interpreted as stating an official position of the European Commission.

You are invited to read the privacy statement for information on how your personal data and contribution will be dealt with.

Please complete this section of the public consultation before moving to other sections.

Respondents with disabilities can request the questionnaire in .docx format and send their replies in email to the following address: GROW-IPRCONSULTATION@ec.europa.eu.

If you are an association representing several other organisations and intend to gather the views of your members by circulating the questionnaire to them, please send us a request in email and we will send you the questionnaire in .docx format. However, we ask you to introduce the aggregated answers into EU Survey. In such cases we will not consider answers submitted in other channels than EU Survey.

If you want to submit position papers or other information in addition to the information you share with the Commission in EU Survey, please send them to GROW-IPRCONSULTATION@ec.europa.eu and make reference to the "Case Id" displayed after you have concluded the online questionnaire. This helps the Commission to properly identify your contribution.

Given the volume of this consultation, you may wish to download a PDF version before responding to the survey online.

**\* Please enter your name/organisation and contact details (address, e-mail, website, phone)**

Organization for Transformative Works, transformativeworks.org,  
rlt26@law.georgetown.edu, 1-703-593-6759

**\* Is your organisation registered in the Transparency Register of the European Commission and the European Parliament?**

In the interests of transparency, organisations (including, for example, NGOs, trade associations and commercial enterprises) are invited to provide the public with relevant information about themselves by registering in the Interest Representative Register and subscribing to its Code of Conduct.

If you are a registered organisation, please indicate your Register ID number. Your contribution will then be considered as representing the views of your organisation.

If your organisation is not registered, you have the opportunity to [register now](#). Then return to this page to submit your contribution as a registered organisation.

Submissions from organisations that choose not to register will be treated as 'individual contributions' unless they are recognized as representative stakeholders via relevant Treaty Provisions.

- Yes
- No
- Non-applicable

**\* Register ID number:**

215153212771-05

**In the interests of transparency, your contribution will be published on the Commission's website. How do you want it to appear?**

- Under the name supplied? (I consent to the publication of all the information in my contribution, and I declare that none of it is subject to copyright restrictions that would prevent publication.)
- Anonymously? (I consent to the publication of all the information in my contribution except my name/the name of my organisation, and I declare that none of it is subject to copyright restrictions that would prevent publication).
- No publication - your answer will not be published and in principle will not be considered.

**"Please note that your answers may be subject to a request for public access to documents under Regulation (EC) No 1049/2001."**

## A. Identification

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**\* You are an intermediary or an association representing intermediaries?**

- Intermediary
- Association

**\* What kind of intermediary service do you provide/represent?**

For the purpose of this consultation:

- "Advertising service provider"

Advertising agencies, advertising broker

- "Contract manufacturing service provider"

Contract manufacturing is an outsourcing of certain production activities previously performed by the manufacturer to a third-party.

This may concern certain components for the product or the assembly of the whole product.

- "Business-to-business data storage provider"

Data storage space and related management services for commercial user.

- "Business-to-consumer data storage provider"

File-storing or file-sharing services for personal media files and data

- "Content hosting platform"

Platforms providing to the user access to audio and video files, images or text documents.

- "Press and media company"

Newspaper, broadcaster

- |                                                                  |                                                                  |
|------------------------------------------------------------------|------------------------------------------------------------------|
| <input type="radio"/> Advertising service provider               | <input type="radio"/> Business-to-business data storage provider |
| <input type="radio"/> Business-to-consumer data storage provider | <input checked="" type="radio"/> Content hosting platform        |
| <input type="radio"/> Contract manufacturing service provider    | <input type="radio"/> DNS hosting service provider               |
| <input type="radio"/> Domain name registrar                      | <input type="radio"/> Domain name registry                       |
| <input type="radio"/> Internet Access Provider                   | <input type="radio"/> Mobile apps marketplace                    |
| <input type="radio"/> Online marketplace                         | <input type="radio"/> Other                                      |
| <input type="radio"/> Payment service provider                   | <input type="radio"/> Press and media company                    |
| <input type="radio"/> Retailer                                   | <input type="radio"/> Search engine                              |
| <input type="radio"/> Social media platform                      | <input type="radio"/> Transport and logistics company            |
| <input type="radio"/> Wholesaler                                 |                                                                  |

**\* Please indicate your country of establishment?**

- |                                           |                                         |
|-------------------------------------------|-----------------------------------------|
| <input type="checkbox"/> Austria          | <input type="checkbox"/> Belgium        |
| <input type="checkbox"/> Bulgaria         | <input type="checkbox"/> Croatia        |
| <input type="checkbox"/> Cyprus           | <input type="checkbox"/> Czech Republic |
| <input type="checkbox"/> Denmark          | <input type="checkbox"/> Estonia        |
| <input type="checkbox"/> Finland          | <input type="checkbox"/> France         |
| <input type="checkbox"/> Germany          | <input type="checkbox"/> Greece         |
| <input type="checkbox"/> Hungary          | <input type="checkbox"/> Ireland        |
| <input type="checkbox"/> Italy            | <input type="checkbox"/> Latvia         |
| <input type="checkbox"/> Lithuania        | <input type="checkbox"/> Luxembourg     |
| <input type="checkbox"/> Malta            | <input type="checkbox"/> Netherlands    |
| <input checked="" type="checkbox"/> Other | <input type="checkbox"/> Poland         |
| <input type="checkbox"/> Portugal         | <input type="checkbox"/> Romania        |
| <input type="checkbox"/> Slovakia         | <input type="checkbox"/> Slovenia       |
| <input type="checkbox"/> Spain            | <input type="checkbox"/> Sweden         |
| <input type="checkbox"/> United Kingdom   |                                         |

**\* Please specify**

*500 character(s) maximum*

The OTW is a 501(c)(3) US nonprofit organization; its website hosting transformative noncommercial works, the Archive of Our Own, has over 770,000

registered users and receives over 115 million page views per week. We represent artists who make works commenting on and transforming existing works, adding new meaning and insights—from reworking a film from the perspective of the “villain” to retelling the story as if a woman, instead of a man, were the hero.

**\* What is the size of your company and the level at which it operates its business?**

- "SME"

According to Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises, 2003/361/EC: enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding EUR 50 million, and/or an annual balance sheet total not exceeding EUR 43 million ([SME Definition](#)).

- |                                                                                                       |                                                                                                            |
|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| <input type="radio"/> EU based SME providing services in one EU Member State                          | <input type="radio"/> EU based SME providing services in various EU Member States                          |
| <input type="radio"/> EU based company (other than SME) providing services in one Member State        | <input type="radio"/> EU based company (other than SME) providing services in various EU Member States     |
| <input type="radio"/> Non-EU based SME providing services in one EU Member State                      | <input checked="" type="radio"/> Non-EU based SME providing services in various EU Member States           |
| <input type="radio"/> Non-EU based company (other than SME) providing services in one EU Member State | <input type="radio"/> Non-EU based company (other than SME) providing services in various EU Member States |
| <input type="radio"/> Company, part of multinational corporate group                                  | <input type="radio"/> Other                                                                                |

**\* In which Member States do you offer services?**

- |                                                          |                                    |
|----------------------------------------------------------|------------------------------------|
| <input checked="" type="checkbox"/> All EU member states | <input type="checkbox"/> Austria   |
| <input type="checkbox"/> Belgium                         | <input type="checkbox"/> Bulgaria  |
| <input type="checkbox"/> Croatia                         | <input type="checkbox"/> Cyprus    |
| <input type="checkbox"/> Czech Republic                  | <input type="checkbox"/> Denmark   |
| <input type="checkbox"/> Estonia                         | <input type="checkbox"/> Finland   |
| <input type="checkbox"/> France                          | <input type="checkbox"/> Germany   |
| <input type="checkbox"/> Greece                          | <input type="checkbox"/> Hungary   |
| <input type="checkbox"/> Ireland                         | <input type="checkbox"/> Italy     |
| <input type="checkbox"/> Latvia                          | <input type="checkbox"/> Lithuania |
| <input type="checkbox"/> Luxembourg                      | <input type="checkbox"/> Malta     |
| <input type="checkbox"/> Netherlands                     | <input type="checkbox"/> Poland    |
| <input type="checkbox"/> Portugal                        | <input type="checkbox"/> Romania   |
| <input type="checkbox"/> Slovakia                        | <input type="checkbox"/> Slovenia  |
| <input type="checkbox"/> Spain                           | <input type="checkbox"/> Sweden    |
| <input type="checkbox"/> United Kingdom                  |                                    |

## B. Exposure to and impact of infringements

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**\* Do you experience use of your services by third parties resulting in infringement of IPR?**

- Yes

No

**How do you become aware of infringements?**

- |                                                   |                                                                                |
|---------------------------------------------------|--------------------------------------------------------------------------------|
| <input type="checkbox"/> In-house investigation   | <input type="checkbox"/> Use of external service provider                      |
| <input type="checkbox"/> Notification by customs  | <input type="checkbox"/> Notification by police or other enforcement authority |
| <input type="checkbox"/> Notification by customer | <input checked="" type="checkbox"/> Notification by rightholder                |
| <input type="checkbox"/> Other                    | <input type="checkbox"/> No opinion                                            |

**\* How do infringements impact on your business?**

- Loss of turnover
- Reputational damage
- Enforcement costs
- Other
- No opinion

**\* Please specify**

*500 character(s) maximum*

In a very small number of cases, users post full copies of in-copyright works without proper authorization. However, most notifications of claimed infringement are invalid attempts to assert non-copyright rights such as claims against duplication in work titles, or claims that a noncommercial, descriptive use infringes trademark rights. Infringement has no impact on the Archive; mistaken and overreaching takedown requests, however, have profound impacts on our users.

**\* What is the overall financial impact of IPR infringements?**

- Positive
- Negative
- No opinion

**Please provide an estimation of the impact in percentage of the overall turnover:**

%

**\* How did IP infringements develop over last 10 years?**

- Decreased
- Increased
- Unchanged
- Don't know

**Please explain:**

*1500 character(s) maximum*

The Archive has consistently experienced a low level of valid infringement claims, averaging less than one per year.

## C. Functioning of key provisions of Directive 2004/48/EC on the enforcement of intellectual property rights

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This section aims to provide the Commission with stakeholder' views, opinions and information about the functioning of the overall enforcement framework and of key provisions of IPRED.

### C.1. Overall functioning of the enforcement framework

**\* Do you think that the existing rules have helped effectively in protecting IP and preventing IP infringements?**

- Yes  
 No  
 No opinion

Please explain:

*1500 character(s) maximum*

A yes/no question is not adequate to address the complexities of the situation, in which over-enforcement of intellectual property rights can chill innovation and expression. The OTW operates under the US DMCA, which has a different structure than EU rules. Section 512 has allowed many online services to thrive in the face of otherwise impossible barriers to entry. By allowing US service providers to launch without either rigid requirements for content filtering or potentially unlimited liability, undreamed-of services have provided new kinds of value to people around the world, from Pinterest to DeviantArt to the OTW's own noncommercial website. However, the DMCA's effectiveness depends on effective procedures for preventing misuse and overreach by intellectual property claimants, something that we see all too often.

**\* Do you consider that the measures and remedies provided for in the Directive are applied in a homogeneous manner across the MS?**

- Yes  
 No  
 No opinion

### C.2. Measures, procedures and remedies provided for by IPRED

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Responses to this section should be based on the overall experience with the measures, procedures and remedies provided for by IPRED as implemented and applied at national level. If appropriate please specify in your response, to the extent possible, particular national issues or practices and the jurisdiction concerned.

#### C.2.1. Right of information (Article 8)

**Have you received a request for information?**

- Yes
- No

**\* Do you consider the application of the rules on the right of information to be clear and unambiguous?**

- Yes
- No
- No opinion

**\* In view of your experience with the application of the right of information do you think that the existing rules have helped effectively in protecting IP and preventing IPR infringements?**

- Yes
- No
- No opinion

**\* In view of your experience with the application of the right of information do you see a need to adjust the provisions for the application of that measure?**

- Yes
- No
- No opinion

**\* Do you see a need to clarify the criteria used to reconcile the requirements of the right to respect for private life/right to protection of personal data on the one hand and the right to effective remedy on the other hand when assessing requests for disclosure of personal data for the purpose of initiating judicial proceedings?**

- Yes
- No
- No opinion

### C.2.2. Procedures and courts, damages and legal costs (Articles 3, 13 and 14)

**Have you been subject to legal action in cases of IPR infringements?**

- Yes, as an applicant
- Yes, as a defendant
- No

**Did you claim reimbursement of legal costs incurred in proceedings related to IPR infringements?**

- Yes
- No

**Have you been subject to a claim for damages by an IP rightholder for alleged active and knowing facilitation of IPR infringements?**

- Yes

No

\* In view of your experience with the application of the rules for the reimbursement of legal costs do you see a need to adjust the application of that measure?

Yes

No

No opinion

\* In view of your experience with the application of the rules for the calculation of damages do you see a need to adjust the application of that measure?

Yes

No

No opinion

### C.2.3. Provisional and precautionary measures and injunctions (Articles 9 and 11)

#### Provisional and precautionary measures

Have you been subject to an application for provisional and precautionary measures in case of an alleged IPR infringement?

Yes

No

#### Injunctions

Have you been subject to an injunction in case of an IPR infringement?

Yes

No

In your experience what are the main reasons for applying for an injunction?

	Very relevant	Relevant	Less relevant	Not relevant	Don't know
Block access to infringing content online	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Stay down of infringing content online	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Adopt technical measures such as filtering	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
De-indexing infringing websites	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Permanent termination of domain	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Permanent termination of subscriber account	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Discontinue providing payment services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Discontinue providing advertising services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Discontinue providing transport services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Discontinue manufacturing of infringing products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Termination of lease for commercial premises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**\* In view of your experience with the application of the rules for provisional/permanent injunctions do you see a need to adjust the application of that measure?**

- Yes
- No
- No opinion

**\* Should the Directive explicitly establish that all types of intermediaries can be enjoined?**

- Yes
- No
- No opinion

Please explain:

*1500 character(s) maximum*

The more expansive the definition of "intermediary," the greater the risk that injunctions will inhibit the growth of technology that facilitates noninfringing expression. An injunction is an extraordinary remedy and the burden should be on the party seeking an injunction to establish that an injunction is appropriate. Therefore, the types of intermediaries subject to injunction should be as narrow as practicable.

**\* Should the Directive explicitly establish that no specific liability or responsibility (violation of any duty of care) of the intermediary is required to issue an injunction?**

- Yes
- No
- No opinion

Please explain:

*1500 character(s) maximum*

The costs of such relief, including the costs to noninfringing expression, may vary depending on time, technology, and other factors. A rule that would

enjoin activity without a showing of specific liability or responsibility may frustrate valuable technologies and suppress valuable expression.

**\* Should the Directive explicitly establish that national courts must be allowed to order intermediaries to take measures aimed not only at bringing to an end infringements already committed against IPR using their services, but also at preventing further infringements?**

- Yes  
 No  
 No opinion

Please explain:

*1500 character(s) maximum*

Prospective measures are often presumed to be useful, but the evidence is that they are limited in ability, prone to error and abuse, and anti-competitive. Even the possibility of filtering depends on the media involved [see the OTW's submission to <https://www.regulations.gov/#!documentDetail;D=COLC-2015-0013-86027>] In addition, implementing prospective measures would be prohibitively difficult and expensive for small intermediaries such as the OTW, which is volunteer-operated. Rules that may seem practical for large entities like YouTube and eBay may be entirely unworkable for smaller entities, and the law should not discourage the formation of small entities by forcing them to undertake costly filtering measures.

**\* In that respect should the Directive establish criteria on how preventing further infringements is to be undertaken (without establishing a general monitoring obligation under the E-Commerce Directive)?**

- Yes  
 No  
 No opinion

Please explain:

*1500 character(s) maximum*

There is a mismatch between legislative dictate and workable technological design for individual institutions. Other industry-specific copyright rules, such as those relating to music and to cable systems, provide persuasive evidence about the problems of technological lock-in, industry group capture, and simple incomprehensibility that can result when non-engineers try to design technological systems. Notice and takedown, while imperfect, is predictably better than alternatives that suppress more speech and require expensive filtering measures.

**\* Do you see a need for criteria defining the proportionality of an injunction?**

- Yes  
 No

No opinion

Please explain:

*1500 character(s) maximum*

Predictability across jurisdictions is important, but general statements are unlikely to produce uniform results across jurisdictions without extremely clear rules. Proportionality is one of the vital elements of any copyright regime, but a false sense of uniformity may be counterproductive.

**\* Do you see a need for a definition of the term "intermediary" in the Directive?**

- Yes  
 No  
 No opinion

**\* Do you see a need for a clarification on how to balance the effective implementation of a measure and the right to freedom of information of users in case of a provisional measure or injunction prohibiting an internet service provider from allowing its customers access to allegedly IPR infringing material without specifying the measures which that service provider must take?**

- Yes  
 No  
 No opinion

Please explain:

*1500 character(s) maximum*

In general, the legislator should recognize that not all results can be programmed into all technologies.

**\* Do you see a need for other amendments to the provisions on provisional and precautionary measures and on injunctions?**

- Yes  
 No  
 No opinion

#### C.2.4. Other issues

**\* Are there any other provisions of the Directive which, in your view, would need to be improved?**

- Yes  
 No  
 No opinion

**\* Please explain:**

*3000 character(s) maximum*

The measures provided for in Articles 6(2), 8(1) and 9(2) of the Directive should be limited to acts carried out on a commercial scale, and the definition of “commercial scale” should be limited to acts carried out for direct economic or commercial advantage. The U.S. experience concerning ambiguities in the meaning of “commercial” is informative in demonstrating some of the pitfalls of broad definitions of commerciality. See Jennifer E Rothman, “Commercial Speech, Commercial Use, and the Intellectual Property Quagmire,” 101 Va. L. Rev. 1929 (2015). While this is not the only area for improvement, it is one that particularly stands out to the OTW, which provides a nonprofit platform for users to post non-commercial works.

## D. Issues outside the scope of the current legal framework

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### D.1. Role of intermediaries in IPR enforcement and the prevention of IPR infringements

**\* Do you believe that intermediary service providers should play an important role in enforcing IPR?**

- Yes  
 No  
 No opinion

Please explain:

*1500 character(s) maximum*

In advance of specific notifications, ISPs have no way of knowing which rights are valid, who is authorized to disseminate works, which exceptions or limitations might apply to particular works, and so on. While it is reasonable to expect ISPs to respond when given notice of specific infringements, rights owners themselves must take the lead in identifying their works and infringing uses of those works.

**\* Do you cooperate with rightholders or rightholders' association in the protection and enforcement of IPR?**

- Yes  
 No

**\* The cooperation covers the following IPR**

- |                                               |                                                   |
|-----------------------------------------------|---------------------------------------------------|
| <input checked="" type="checkbox"/> Copyright | <input type="checkbox"/> Trademark rights         |
| <input type="checkbox"/> Design rights        | <input type="checkbox"/> Geographical indications |
| <input type="checkbox"/> Patent rights        | <input type="checkbox"/> All IP rights            |
| <input type="checkbox"/> Other                | <input type="checkbox"/> Don't know               |

**\* In which form do you cooperate with these rightholders?**

- Bilaterally

- Within a multilateral cooperation agreement
- Other

\* Please specify

*500 character(s) maximum*

The OTW complies with valid DMCA notices specifying the infringed work where it appears that the sender has made a good-faith consideration of whether fair use applies.

\* **Do you consider your cooperation with rightholders successful?**

- Yes
- No
- No opinion

\* **On the basis of your experience what are the main challenges in establishing a successful cooperation between rightholders and intermediaries?**

- Economic interests (e.g. additional costs)
- Technology
- Specific regulatory requirements
- Other
- No opinion

\* Please specify

*500 character(s) maximum*

We have repeatedly received invalid and overreaching claims. When IPR owners can suppress works merely by notifying an ISP, they have no incentive to take even reasonable care to notify properly. Sorting the valid from the invalid claims is burdensome, especially for our all-volunteer service, and many ISPs take the path of least resistance and accept all notices. Involving intermediaries in the enforcement of IPR without due process safeguards is dangerous; sanctions for abuse are needed.

\* **In your opinion does the voluntary involvement of intermediary service providers in enforcing IPR have or might have a negative impact on fundamental rights?**

- Yes
- No
- No opinion

\* **How could fundamental rights be negatively affected?**

- Limitation of freedom of expression
- Limitation of freedom to conduct business
- Limitation of the right to due process
- Limitation to the dissemination of legal content
- Other

**\* Please specify**

*500 character(s) maximum*

Notice to ISPs functions as a system of extra-judicial injunctions on speech, designed to save legitimately aggrieved IPR holders from the cost and delay of court action, it is crucial that these savings do not come at the expense of suppressing non-infringing speech. Private agreements with rightsholders also risk anticompetitive effects, such as Google's continuing dominance in the market. Urban et al., supra, at 64.

**Other comments on the role of intermediaries in IPR enforcement and the prevention of IPR infringements:**

*3000 character(s) maximum*

## D.2 Other issues

**\* Do you identify any other issue outside the scope of the current legal framework that should be considered in view of the intention to modernise the enforcement of IPR?**

- Yes  
 No

## E. Other comments

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**\* E. Do you have any other comments?**

- Yes  
 No

**\* Please explain:**

*3000 character(s) maximum*

Based on a sample of IP addresses used by creators, more EU-based creators use the Archive of Our Own than United States-based creators, with top contributors from the United Kingdom (second most common), Germany (third), and the Netherlands (fourth). Creators from France and Poland are in the top ten sources; Italy, Sweden, and Spain are in the top twenty; and the remainder of the EU countries are also represented, ranging from Belgium at #21 to Malta at #87. At a bare minimum, hundreds of creative works have been posted on the Archive from each country, reaching into the tens of thousands for the countries in the top ten. The Archive has a stake in the creative future of Europe, because Europe's current and future creators are using the Archive. The OTW urges the Commission to recognize that significant innovation and

creativity can come from the noncommercial sector, and not to make rules that only large businesses will be able to follow.

## Useful links

Enforcement of intellectual property rights

([http://ec.europa.eu/growth/industry/intellectual-property/enforcement/index\\_en.htm](http://ec.europa.eu/growth/industry/intellectual-property/enforcement/index_en.htm) )

The Single Market Strategy ([http://europa.eu/rapid/press-release\\_MEMO-15-5910\\_en.htm](http://europa.eu/rapid/press-release_MEMO-15-5910_en.htm) )

The Digital Single Market Strategy ([http://europa.eu/rapid/press-release\\_MEMO-15-4920\\_en.htm](http://europa.eu/rapid/press-release_MEMO-15-4920_en.htm) )

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## Background Documents

[DE] Datenschutzerklärung (</eusurvey/files/dd8b2d68-19ef-46c1-94c2-5dd4895a22e6>)

[DE] Hintergrund (</eusurvey/files/26d0940d-472f-4175-b55e-474f9aaf7931>)

[EN] Background information (</eusurvey/files/a5da5dca-4fed-4d7d-a452-a326303ac265>)

[EN] Privacy statement (</eusurvey/files/76e773ff-7057-476a-8440-0cdac45a21df>)

[ES] Antecedentes (</eusurvey/files/a2ffeaea-5b75-454e-a65f-741d784e4cf5>)

[ES] Declaración de confidencialidad (</eusurvey/files/567d7bec-dabe-40a6-9598-98de4eeace82>)

[FR] Contexte (</eusurvey/files/81aa2212-332b-4808-9059-fde91b1043a9>)

[FR] Déclaration relative la protection de la vie privée (</eusurvey/files/af24e5d2-8a6d-4867-bb8a-8af697c057b5>)

[IT] Contesto (</eusurvey/files/c5544db2-47c3-459b-bc63-d750ace25279>)

[IT] Informativa sulla privacy (</eusurvey/files/f4e8e5fe-5739-4867-b2aa-1f8327318ed5>)

[PL] Kontekst (</eusurvey/files/4c3e015f-c229-46a6-9330-0aa8b594df45>)

[PL] Oświadczenie o ochronie prywatności (</eusurvey/files/3d746855-55a0-41ff-9ed0-f66f43c30c22>)

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## Contact

✉ [GROW-IPRCONSULTATION@ec.europa.eu](mailto:GROW-IPRCONSULTATION@ec.europa.eu)

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