Joint letter by international and national organizations representing press publishers to the Prime Minister of the Hellenic Republic









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To

Prime Minister of the Hellenic Republic

Mr. Kyriakos Mitsotakis

Via E-Mail: primeminister@primeminister.gr

Dear Prime Minister,

The signatories of this letter are international organizations and national associations and collective management organizations (CMO) representing press publishers across Europe, Australia and South Africa.

Greece, the birthplace of democracy, has always safeguarded the pillars of democratic society, among which the free and independent Press is paramount. Today, however, the Press—and therefore democracy itself—faces unprecedented challenges worldwide, primarily due to the dominance of very large technology companies (such as Google, Microsoft, and Meta) in the dissemination of news.

One of the most pressing challenges is the so-called *value gap* created in the relationship between the Press and the platforms. The platforms exploit publishers' content (in search engines, news aggregation, consumer profiling etc.), securing a substantial part of their revenues without authorization and without fair compensation. This exploitation directly undermines publishers' ability to monetize their work, further eroding their advertising income and threatening the sustainability of the news business.

The European Union has addressed this problem by adopting the new Press Publishers' Right, which establishes the legal framework for claiming fair remuneration. Greece has transposed this right into national law (L.4996/2022 of Ministry of Culture,) and introduced a mediation mechanism, with the Hellenic Telecommunications and Post Commission (EETT) mandated to issue a regulation specifying the criteria and methodology for calculating publishers' remuneration.

We have been informed by our greek colleagues, however, that the EETT is considering excluding the indirect revenues of the large platforms from this

calculation. Such an exclusion would drastically minimize the remuneration due to publishers, leaving only a negligible fraction of the platforms' vast revenues to be shared. This would defeat the very purpose of both European and national legislation: the value gap would remain, and the viability of the Press sector in Greece would be put at serious risk.

Moreover, this approach—which in effect coincides with the wishes of the platforms—contradicts the rulings of the French Competition Authority in similar cases. In its decision of 15 March 2024 (Case 24-D-03), the Authority explicitly recognized that indirect revenues must also be taken into account. It also disregards the findings of numerous international studies demonstrating that the platforms' total revenues are inherently linked, directly and indirectly, to press publishers' content (e.g. Fehradvice, March 2023, Switzerland; Germany, June 2025; Holden, Mateen, Schiffin, and Tabakovic, U.S., October 2023).

For these reasons, we respectfully urge you, Mr. Prime Minister, to take all necessary measures to ensure that the Greek regulatory framework fully achieves its intended purpose: to guarantee fair and effective remuneration for publishers, in line with European law and international best practice. Only in this way can we safeguard the economic sustainability of the Press and thereby uphold one of the essential pillars of our democracy.

We thank you for your attention and remain at your disposal for any further discussion.

Respectfully, The signatories of this letter

EMMA, the European Magazine Media Association, is the unique and complete representation of Europe's magazine media, which is today enjoyed by millions of consumers on various platforms. EMMA represents thousands of magazine publishing houses across Europe in print and digital. See: http://www.magazinemedia.eu

Rue de Namur 73A, Brussels – Belgium | http://www.magazinemedia.eu

ENPA, the European Newspaper Publishers' Association (ENPA) is the largest representative body of newspaper publishers across Europe. ENPA is a principal interlocutor to the EU institutions and a key driver of media policy debates in the European Union. See: www.enpa.eu

Rue de Namur 73a, Brussels – Belgium | www.enpa.eu

IFRRO – The International Federation of Reproduction Rights Organisations, based in Brussels, Belgium, is the leading organization representing collective management organizations for text and image materials – known as Reproduction Rights Organisations (RROs) – as well as authors' and publishers' organizations in the field of text and image-based works. With over 160 members across approximately 90 countries, IFRRO plays a pivotal role in the global copyright ecosystem. IFRRO's mission is to develop and promote effective collective rights management, ensuring that the copyrights of authors and publishers are respected and remunerated through the lawful use of text and image-based works. Together, IFRRO's members represent millions of authors, visual artists, and publishers spanning various media, including books, journals, newspapers, magazines, and printed music.

Rue du Prince Royal 85-87, 1050 Brussels, Belgium | https://ifrro.org/

News Media Europe Europe promotes the interests of the news media industry to the European Union institutions. A modern, inclusive and proactive force in the EU lobby sector, News Media Europe represents the interests of publishers of newspapers and news media on all platforms.

Sq. de Meeûs 35, 1000 Bruxelles, Belgium | https://www.newsmediaeurope.eu/

PDLN – Press Database and Licensing Network is an association representing organisations owned or controlled by publishers who license or supply newspaper, newspaper website, magazine and related material for media monitoring, analysis and platform services. PDLN was founded in 2008 and has grown rapidly. PDLN has 39 members in 25 countries.

1, Chalk Dell Cottages, Bereleigh Road, East Meon, Petersfield GU321PQ | https://www.pdln.info/

EPC - European Publishers Council The European Publishers Council is a high-level group of Chairmen and CEOs of leading European news media and publishing groups. The EPC has been communicating with Europe's legislators since 1991 on issues that affect the health and viability of journalistically-driven publishing companies in the European Union which uphold the freedom of expression, media diversity, and democratic debate. For more information www.epceurope.eu

Rue de la Loi 155 | Building C - 5th floor, 1040 Brussels, Belgium | www.epceurope.eu

Alliance de la Presse d'Information Générale is the main French publishers organization, bringing together nearly 300 national & local, daily & weekly newspapers. They employ 42% of French journalists and distribute 4.6 million copies daily and 1.6 million copies weekly, reaching nearly 95% of French people over the age of 18.

69, rue du Chevaleret, 75013 Paris, Île-de-France | https://www.alliancepresse.fr/

BPCMO - Baltic Press Publishers` Collective Management Organisation safeguards and advances the rights and interests of news media publishers in Estonia, Latvia, and Lithuania, primarily related to economic copyrights. BPCMO represents and assists publishers during negotiations with online platforms that utilize media content (such as Google and Facebook). Additionally, facilitates straightforward licensing agreements for users, allowing them to easily access and license media content. Founded in June 2024 by Delfi Meedia, Postimees Grupp, Õhtuleht Kirjastus, and Äripäev, the Baltic Press Publishers' CMO collaborates closely with other European collective management organizations.

Pärnu mnt 67a, 10134 Tallinn, Harju County, Republic of Estonia | https://balticpresspublishers.eu/

CEDRO – CENTRO ESPAÑOL DE DERECHOS REPROGRÁFICOS EGDPI is the Spanish CMO which represents authors and publishers of books, newspapers, magazines and musical scores. It currently has 36.117 direct members.

C/CEDACEROS 10, 3r, 28014, Madrid, España | https://www.cedro.org/inicio

CFC is the French collective management organisation repesentanting press and book publishers and authors. CFC is a member of PDLN and IFRRO.

18, rue du 4 Septembre, 75002 Paris | https://www.cfcopies.com/

Copyright Agency is an Australian not-for-profit organisation that has been standing up for creators for 50 years, to promote and protect a sustainable future for Australian authors, publishers and artists. It serves and connects creators and users by providing licences and solutions that deliver fair compensation and support the evolving needs of users.

Level 12, 66 Goulburn St, Sydney NSW 2000, Australia | https://www.copyright.com.au/

Corint Media is the CMO handling 30% of German Press Publishers' rights and >90% of German TV Broadcaster neighbouring rights.

GmbH Lennéstr. 5 10785 Berlin, Germany | https://www.corint-media.com

DARLO – Dramatic, Artistic and Literary Rights Organisation (Pty) Limited is a multi-purpose collective management organisation (CMO) established in 1967. With over half a century of service, it has requisite track record, networks and reliability. DALRO licenses works, facilitates and grants permission for copyright users to reproduce works, collects fees and remunerates copyright holders. It focuses on three areas of copyright; literary works (which includes dramatic works), artistic works and published editions.

Building 1, Waverley Office Park, 15 Forest Road, Bramley, Gauteng, South Africa, 2090 | https://dalro.co.za/

DPCMO - Danish Press Publications Collective Management Organisation. Founded in 2021, DPCMO is a non-profit collective rights management organisation representing Danish media companies and their press publishers neighbouring rights, text and data mining and AI rights. DPCMO represents a diverse circle of members, state-owned public service media, local, regional and national newspapers, magazines, special media, and digitals media outlets. DPCMO represents approximately 99% of Danish publishers, is approved by the Ministry of Culture as CMO and has a co-operation agreement with the authors' organisations. A diverse and vibrant media landscape is essential to democracy.

Berlingske Media A/S, Pilestræde 34, 1112 København K | https://dpcmo.dk/

DVP - La Société des droits voisins de la Presse Is a French collective management organization established on October 26, 2021. It was founded by publishers and press agencies who shared a belief in the advantages of collective management for protecting their rights. This belief was strengthened by the challenges these publishers and agencies faced in enforcing licensing agreements that ensure they receive remuneration for neighboring rights, as recognized by the law on July 24, 2019. These rights pertain to the use of their content by online public communication services. The primary goal of DVP is to authorize and set the terms for the use of its repertoire, which consists of press publications submitted by its members, including both publishers and press agencies. Currently, DVP has 383 members, comprising 324 press publishers and 59 press agencies, and manages a repertoire of 871 press publications. However, it is important to note that DVP does not represent all members of its repertoire in every negotiation. Mélanie Loubersac serves as the CEO of DVP, while Jean-Marie Cavada is the Chairman of the Board of Directors. For more information, please visit our website at www.dvpresse.fr.

2 rue du Général Lanrezac – 92 200 Neuilly sur Seine – France | https://www.dvpresse.fr/

FIEG - Italian Federation of Newspapers and Magazines Publishers, founded in 1950, is the main national association representing Italian publishers of daily and periodical titles, both printed and digital, and also the press agencies.

Via Piemonte, 64, 00187 – Roma | https://www.fieg.it/index.asp?home=0

L2P - License2Publish is the collective management organization of the Flemish news publishers.

Kantersteen 47, 1000 Brussel | https://license2publish.be/

Magyar Lapkiadók Egyesülete is The Hungarian Publishers' Association represents the common interests of Hungarian newspaper and magazine publishers towards the government, political institutions, parties, and business partners. Its goal is the strong representation of the advantages of the print press to all players in the media market, making use of both domestic and international experiences of its members. It promotes fair business conduct, popularizes progressive business solutions, strengthens ethical behaviour in both publishing and journalism, and develops and reinforces the prestige of the publishing industry. www.mle.org.hu

Mészáros utca 15-17, 1016 Budapest | www.mle.org.hu

OSDEL - Greek Collecting Society for Literary Works Organisation is the Greek Collecting Society for Literary Works and is a non-profit civil cooperative, founded on 1996 by initiative of writers' and publishers' unions. OSDEL is operating under license from the Hellenic Ministry of Culture and Sports and belongs to its members, authors, journalists, translators, illustrators and publishers, and is administered by them.

73, Themistokleous str. GR-106 83 Athens, Greece | https://www.osdel.gr/

Repropol - Stowarzyszenie Dziennikarzy i Wydawców is an organization founded by press publishers and acting on their behalf. We have a permit from the Minister of Culture and National Heritage to conduct activities in the field of collective management of copyright and related rights, as well as the protection of copyright and related rights belonging to press publishers. Our mission is to enable users to use press materials in accordance with the law, while protecting the rights of publishers. To this end, we grant users licenses to use periodical publications and parts of periodical publications that have independent significance. Acting on behalf of press publishers, we also collect the remuneration provided for in the Copyright and Related Rights Act and distribute and pay it to press publishers.

Organizacja Zbiorowego Zarządzani, ul. Słupecka 6, 02-309 Warszawa | https://www.swrepropol.pl/

SLPV - Správce licenčních práv vydavatelů, z.s. is the collective rights management organization established by publishers of online print publications in Czech Republic. Our goal is to defend the rights of publishers in the Czech Republic against the users of their content, which include mainly large technology platforms, search engines, social networks and press monitoring services.

Opletalova 919/5, Nové Město (Praha 1), 110 00 Praha | https://www.slpv.cz/

SPCMO - **Swedish Publishers Collective Management Organisation** is the Swedish non-profit collective management organization (CMO) for press publishers, founded in 2023, owned, and controlled by its rightsholders.

c/o Mediarevolution Nu AB, Observatoriegatan 13 BV, 113 29 STOCKHOLM | https://spcmo.se/en/front-page/

Stichting OPR – Stichting Organisatie voor Persuitgeversrecht is the Dutch collective management organisation for Press Publishers' Right, representing all Dutch newspapers, national and regional public broadcasters and the majority of magazines.

Herkenbosscherweg 5, 6045 AP Roermond | https://stichtingopr.nl/