Stakeholder's consultation and call for expression of interest (via EU survey) aimed at supporting the implementation of the Measure 1.3 of the General-Purpose AI Code of Practice's Copyright Section

Fields marked with * are mandatory.

Introduction

The AI Act includes under Article 53 (1) (c) an obligation for providers of General Purpose AI (GPAI) models to put in place a policy to respect EU copyright law and in particular "to identify and comply with, including through state-of-the-art technologies, a reservation of rights expressed pursuant to Article 4(3) of Directive (EU) 2019/790". This obligation has become applicable as of 2 August 2025.

Article 4 of the 2019 Copyright in the Digital Single Market Directive ('DSM Directive') introduced a copyright exception for text and data mining ('TDM') purposes, which is relevant in the process of using lawfully accessible copyright-protected content for the training of AI models. Article 4 includes, under its paragraph 3, a right-reservation mechanism (the so-called 'opt-out'), allowing rightsholders to reserve their rights and exclude the use of their works from TDM processing. The opt-out must be expressed in an appropriate manner, such as machine-readable means for content made publicly available online.

In accordance with Article 56 AI Act, the AI Office has facilitated the drawing up of a Code of Practice (CoP) to enable compliance with the respective obligations established in the AI Act by GPAI model providers, including the obligations related to copyright. The final version of the CoP, which includes three distinct chapters, was published on 10 July 2025.

In the Copyright chapter, Measure 1.3 includes two operational commitments to ensure that signatories will identify and comply with TDM rights reservations expressed pursuant to Article 4(3) of the 2019 DSM Directive when they are scraping or otherwise compiling data from the World Wide Web:

- They commit to use web-crawlers that read and follow instructions expressed in accordance with the Robot Exclusion Protocol (robots.txt) and any subsequent version that is technically implementable;

- They commit to identify and comply with other appropriate machine-readable protocols to express opt-outs, which either result from international or European standardisation activity or have been generally agreed upon through an inclusive process facilitated at EU level.

It also encourages signatories to support the above-mentioned processes and engage on a voluntary basis in bona fide discussions with rightsholders and other relevant stakeholders, with the aim to develop appropriate machine-readable standards and protocols to express rights reservations.

Measure 1.3 Identify and comply with rights reservations when crawling the World Wide Web

(1) In order to help ensure that Signatories will identify and comply with, including through state of-the-art technologies, machine-readable reservations of rights expressed pursuant to Article 4(3) of Directive (EU) 2019/790 if they use web-crawlers or have such web-crawlers used on their behalf to scrape or otherwise compile data for the purpose of text and data mining as defined in Article 2(2) of Directive (EU) 2019/790 and the training of their general-purpose AI models, Signatories commit:

a) to employ web-crawlers that read and follow instructions expressed in accordance with the Robot Exclusion Protocol (robots.txt), as specified in the Internet Engineering Task Force (IETF) Request for Comments No. 9309, and any subsequent version of this Protocol for which the IETF demonstrates that it is technically feasible and implementable by AI providers and content providers, including rightsholders, and

b) to identify and comply with other appropriate machine-readable protocols to express rights reservations pursuant to Article 4(3) of Directive (EU) 2019/790, for example through asset-based or location-based metadata, that have either have been adopted by international or European standardisation organisations, or are state-of-the-art, including technically implementable, and widely adopted by rightsholders, considering different cultural sectors, and generally agreed through an inclusive process based on bona fide discussions to be facilitated at EU level with the involvement of rightsholders, AI providers and other relevant stakeholders as a more immediate solution, while anticipating the development of standards.

(2) This commitment does not affect the right of rightsholders to expressly reserve the use of works and other protected subject matter for the purposes of text and data mining pursuant to Article 4(3) of Directive (EU) 2019/790 in any appropriate manner, such as machine-readable means in the case of content made publicly available online or by other means.

Furthermore, this commitment does not affect the application of Union law on copyright and related rights to protected content scraped or crawled from the internet by third

parties and used by Signatories for the purpose of text and data mining and the training of their general-purpose AI models, in particular with regard to rights reservations expressed pursuant to Article 4(3) of Directive (EU) 2019/790.

(3) Signatories are encouraged to support the processes referred to in the first paragraph, points (a) and (b), of this Measure and engage on a voluntary basis in bona fide discussions with rightsholders and other relevant stakeholders, with the aim to develop appropriate machine-readable standards and protocols to express a rights reservation pursuant to Article 4(3) of Directive (EU) 2019/790.

(4) Signatories commit to take appropriate measures to enable affected rightsholders to obtain information about the web crawlers employed, their robots.txt features and other measures that a Signatory adopts to identify and comply with rights reservations expressed pursuant to Article 4(3) of Directive (EU) 2019/790 at the time of crawling by making public such information and by providing a means for affected rightsholders to be automatically notified when such information is updated (such as by syndicating a web feed) without prejudice to the right of information provided for in Article 8 of Directive 2004 /48/EC.

To initiate the inclusive process described in Measure I.3 (1)(b) above, the Commission is launching the present survey as the first step towards identifying and generally agreeing on appropriate machine-readable protocols for TDM opt-outs.

The **first section of this survey** aims to gather evidence on the use of existing and available rights reservation solutions to implement Measure 1.3 Point (1)(b) of the GPAI CoP. It therefore focuses on machine-readable solutions other than the Robot Exclusion Protocol (robots.txt) which is covered under Measure 1.3 Point (1)(a). The solutions included in this questionnaire do not affect the right of rightholders to use any other appropriate means to express their right reservations under Article 4(3) of the DSM Directive.

This consultation builds on the findings of the 2025 EUIPO study on development of generative artificial intelligence from a copyright perspective, specifically on the technical solutions identified therein. While investigating the diverse approaches that rightholders have been relying on to manage their rights in the age of AI, the study identifies a number of technical reservation measures that have emerged and have been used to exercise the opt-out from TDM.

By combining the findings of the EUIPO study and the results of the present stakeholders' consultation, and as means to support the implementation of the copyright chapter of the GPAI CoP and, more generally, the AI Act obligation in Article 53(1)c), the Commission will compile a first list of the machine-readable opt-out protocols. This will provide the base for further discussions in the context of two subsequent workshops.
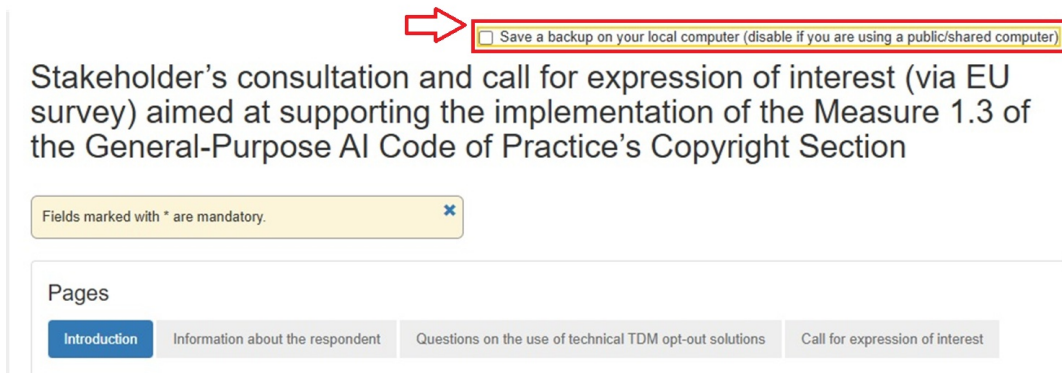
The **second section of this survey** includes a call for expression of interest to contribute to the process based on bona fide discussions to help identify and agree on the opt-out solutions to be considered under

Measure I.3 (1)(b) of the CoP (Copyright Chapter). Please see section 2 for more information in this regard.

This survey is available in **English only** and will be open **starting on 01.12.2025 until 23.01.2026**.

Recommended approach: Please note that the survey doesn`t offer the option to save a draft of your answers and must be filled-out in one go.
Before filling out the questionnaire, **please make sure you disable** the local back-up function of the survey on your computer as shown bellow:

If needed, please download the pdf-version of the questionnaire and assess whether it needs internal consultation within the organisation before answering any of the questions. Please keep in mind that the pdf-version will entail all potentially relevant questions. However, their number will automatically be limited during the fill-out process, according to your answers.

For the information on how we process your personal data please read our privacy statement bellow. If you provide personal data of other individuals (e.g., representatives of your organisation), please share this privacy statement with them.

Privacy_Statement_Consultation_on_the_implementation_of_Measure_1.3_of_the_GPAI_CoP.docx

Introductory section - Information about the respondent

* Which stakeholder category do you/your organisation represents? If more than one category is applicable, please select the category that is best applicable in your situation / from the capacity you are responding in.

- ○ Rightholders
- ○ GPAI model providers
- ● Others

* Please indicate the relevant category

- ○ Business association
- ○ Web editor
- ○ Service provider distributing copyright-protected content online
- ● Civil society organisation

○ Entity that developed TDM opt-out protocol

○ Entity that developed web crawler

○ Data aggregator

○ Standardisation organisation

○ Academia

○ Independent expert

○ Public authority (e.g. intellectual property office)

○ Others

* Please briefly describe the activities of your organisation or yourself:

1000 character(s) maximum

> Open Future is a European think tank working on copyright, data, and AI policy, with a focus on the use of publicly available information in the development and deployment of general-purpose AI systems. Our work combines legal analysis, policy research, and engagement with technical standard-setting processes to support effective, interoperable machine-readable opt-outs from text and data mining and AI training. We have published multiple policy briefs on TDM opt-outs under EU copyright law and actively contribute to the IETF AI Preferences Working Group and related discussions on vocabularies, attachment mechanisms, and compliance under the AI Act and the GPAI Code of Practice.

* First name of the (contact) person filling out the form:

> Paul

* Surname of the (contact) person filling out the form:

> Keller

* Email of the (contact) person filling out the form:

(this information will not be publicly disclosed)

> paul@openfuture.eu

* Organisation name

255 character(s) maximum

> open Future Foundation

* Organisation size

◉ Micro (1 - 9 employees)

○ Small (10 - 49 employees) or Medium (50-249 employees)

○ Small Mid-cap (250-499 employees)

○ Large (500 or more)

○ Other (e-g. multiple organisations)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation. This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

NL - Netherlands

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* Do you agree that we may publish your identity together with your contribution **in case all contributions are made publicly available?**

For participant acting in their personal capacity the publication could include: *The name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution as received. Should you choose to remain anonymous, your name will not be published. Please do not include any personal data in the contribution itself.*

For participants representing one or more organisations the publication could include: *The respondent category you fall under, as indicated by yourself, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution can be published as received. Should you choose to remain anonymous, your name will not be published. Please do not include any personal data in the contribution itself.*

- ◉ Yes
- ◯ No, I choose to remain anonymous

Do you agree that we may contact you in the event of follow-up questions or if we want to learn more about your responses?

- ◉ Yes
- ◯ No

Section 1 - Questions on the use of technical TDM opt-out solutions

* 1. Have you (or your members) developed, deployed or put in place any measures to express or identify rights reservations in a machine-readable format for content publicly available online, pursuant to Art. 4(3) of the DSM Directive?

- ◯ Yes

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◉ No

2. Do you (or your members) have experience with the following technical opt-out solutions identified in the EUIPO study on the Development of Generative AI from a copyright perspective (beyond the robot exclusion protocol which is covered by point I(a) of Measure I.3 of the Code)?

Please mind that, based on your selection here, follow-up questions 3. and/or 4. should appear.

Technical Solution	Yes	No
* TDM reservation protocol (TDMRep)	◉	○
* C2PA TDM Assertions	◉	○
* AI.txt	◉	○
* Do not train registry (Spawning AI)	◉	○
* JPEG Trust core foundation V2	○	◉
* TDM.ai protocol (Liccium)	◉	○
* Open Rights Data Exchange (Valunode)	○	◉

* If no experience with the "JPEG Trust core foundation V2" solution, can you please indicate the reason?

- ☐ not aware of this solution
- ☑ not adapted to express or identify TDM opt out
- ☐ not in a position to express or identify opt-out
- ☐ this solution is too complex to implement
- ☐ this solution is too costly to implement
- ☐ other

* If no experience with the "Open Rights Data Exchange" solution, can you please indicate the reason?

- ☐ not aware of this solution
- ☑ not adapted to express or identify TDM opt out
- ☐ not in a position to express or identify opt-out
- ☐ this solution is too complex to implement
- ☐ this solution is too costly to implement
- ☐ other

3. To what extent do you agree with the following statements in relation to the different TDM opt-out technical solutions for which you have experience

TDM reservation protocol (TDMRep)	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
* a) Solution is mature and well-documented	○	◉	○	○	○
* b) Solution is based on recent/advanced technologies	○	○	○	◉	○

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	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
* c) Solution is technically implementable to express or identify opt-outs for content publicly available online	○	●	○	○	○
* d) Solution is suitable to identify the opt-out for the relevant types of content	○	○	●	○	○
* e) Solution offers a suitable level of resilience to tampering/stripping	○	○	●	○	○
* f) Solution can be implemented at scale (for a high volume of content)	○	●	○	○	○
* g) Solution offers the ability to opt-out in a granular manner (i.e. allows to express and detect preferences on the reservation of rights, e.g. by specifying for which purposes TDM is or is not allowed)	○	○	○	●	○

Please explain your selection regarding the statements (a)-g) relating to the "TDM reservation protocol":

1500 character(s) maximum

> As a generic TDM opt-out protocol developed largely before generative AI emerged as a distinct policy concern, TDMRep provides only limited granularity in the expression of rights reservations. However, it is one of the few mechanisms that explicitly reference Article 4(3) of the CDSM Directive, giving it a clear legal anchoring within the EU copyright framework.

3. To what extent do you agree with the following statements in relation to the different TDM opt-out technical solutions for which you have experience

C2PA TDM Assertions	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
* a) Solution is mature and well-documented	○	●	○	○	○
* b) Solution is based on recent/advanced technologies	○	●	○	○	○
* c) Solution is technically implementable to express or identify opt-outs for content publicly available online	○	●	○	○	○
* d) Solution is suitable to identify the opt-out for the relevant types of content	○	○	●	○	○
* e) Solution offers a suitable level of resilience to tampering/stripping	○	○	●	○	○
* f) Solution can be implemented at scale (for a high volume of content)	○	●	○	○	○

| * g) Solution offers the ability to opt-out in a granular manner (i.e. allows to express and detect preferences on the reservation of rights, e.g. by specifying for which purposes TDM is or is not allowed) | ○ | ◉ | ○ | ○ | ○ |

Please explain your selection regarding the statements (a)-g), relating to the "C2PA TDM Assertions":

1500 character(s) maximum

> C2PA TDM assertions are part of a mature and well-documented specification that builds on established content provenance and authenticity technologies. The solution is technically implementable and, in principle, supports granular expressions of preferences regarding different forms of TDM and AI training. However, its effectiveness is constrained by practical deployment considerations: C2PA relies on metadata embedded in individual assets, which limits its suitability for dynamic web content and makes it vulnerable to stripping when content circulates outside controlled environments. As a result, while C2PA is a valuable component in a broader opt-out ecosystem—particularly for media files distributed through managed pipelines—it is not, on its own, sufficient to address opt-out needs for all content types or large-scale web-based training scenarios.

3. To what extent do you agree with the following statements in relation to the different TDM opt-out technical solutions for which you have experience

AI.txt	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
* a) Solution is mature and well-documented	○	○	○	○	◉
* b) Solution is based on recent/advanced technologies	○	○	○	○	◉
* c) Solution is technically implementable to express or identify opt-outs for content publicly available online	○	○	○	○	◉
* d) Solution is suitable to identify the opt-out for the relevant types of content	○	○	○	○	◉
* e) Solution offers a suitable level of resilience to tampering/stripping	○	○	○	○	◉
* f) Solution can be implemented at scale (for a high volume of content)	○	○	○	○	◉
* g) Solution offers the ability to opt-out in a granular manner (i.e. allows to express and detect preferences on the reservation of rights, e.g. by specifying for which purposes TDM is or is not allowed)	○	○	○	○	◉

Please explain your selection regarding the statements (a)-g) relating to "AI.txt":

1500 character(s) maximum

At the time of writing, the ai.txt specification does not appear to be actively maintained, and the tooling originally developed by Spawning.ai to support its use is no longer publicly available.

3. To what extent do you agree with the following statements in relation to the different TDM opt-out technical solutions for which you have experience

Do not train registry (Spawning AI)	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
* a) Solution is mature and well-documented	○	○	○	○	◉
* b) Solution is based on recent/advanced technologies	○	○	○	○	◉
* c) Solution is technically implementable to express or identify opt-outs for content publicly available online	○	○	○	○	◉
* d) Solution is suitable to identify the opt-out for the relevant types of content	○	○	○	○	◉
* e) Solution offers a suitable level of resilience to tampering/stripping	○	○	○	○	◉
* f) Solution can be implemented at scale (for a high volume of content)	○	○	○	○	◉
* g) Solution offers the ability to opt-out in a granular manner (i.e. allows to express and detect preferences on the reservation of rights, e.g. by specifying for which purposes TDM is or is not allowed)	○	○	○	○	◉

Please explain your selection regarding the statements (a)-g), relating to the "Do not train registry":

1500 character(s) maximum

At the time of writing, the do not train registry does not appear to be actively maintained, and the tooling originally developed by Spawning.ai to support its use is no longer publicly available.

3. To what extent do you agree with the following statements in relation to the different TDM opt-out technical solutions for which you have experience

TDM.ai protocol (Liccium)	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
* a) Solution is mature and well-documented	○	○	○	◉	○
*					

b) Solution is based on recent/advanced technologies	◉	○	○	○	○
* c) Solution is technically implementable to express or identify opt-outs for content publicly available online	○	◉	○	○	○
* d) Solution is suitable to express the opt-out for my specific sector or type of content	○	◉	○	○	○
* e) Solution offers a suitable level of resilience to tampering/stripping	◉	○	○	○	○
* f) Solution can be implemented at scale (for a high volume of content)	○	○	◉	○	○
* g) Solution offers the ability to opt-out in a granular manner (i.e. allows to express and detect preferences on the reservation of rights, e.g. by specifying for which purposes TDM is or is not allowed)	○	○	◉	○	○

Please explain your selection regarding the statements (a)-g), relating to the "TDM.ai protocol":

1500 character(s) maximum

The TDM.ai protocol proposes a conceptually strong, asset-based approach to expressing opt-outs by relying on content-derived identifiers based on the International Standard Content Code (ISCC). This design offers important advantages over location-based mechanisms, including resilience against stripping, applicability across a wide range of content types, and independence from control over hosting infrastructure. At the same time, the protocol is not yet in active use and cannot be considered mature. Its practical viability depends on the availability and governance of supporting registry infrastructure to record and resolve opt-out declarations at scale. While technically implementable and well aligned with EU copyright concepts, further development, deployment experience, and institutional support would be required before it could function as a widely adopted opt-out mechanism.

4. What is, based on your knowledge, the degree of uptake of this specific opt-out solution among rightholders? (Please only respond in relation to the technical solution(s) for which you have experience in line with your response to question 2)

Opt-out Solution	Used in a very limited manner (e.g. sporadic use in one or more specific sectors/for one or more content modality)	Used in a limited manner (e.g. limited use in one or more specific sectors/for one or more content modality)	Used in an moderate manner (e.g. moderate use in one or more than one sector /for one or more than one content modality)	Widely used (e.g. consistently used across one or more sectors/for one or multiple content modalities)	Not aware
* TDM Reservation					

protocol (TDMRep)	◯	⦿	◯	◯	◯

* Please provide data or information on the uptake of any specific solutions, including in specific cultural sectors, in support of the reply related to "TDM Rep":

1500 character(s) maximum

> We have observed limited uptake, primarily among news publishers that were directly involved in, or closely connected to, the development and standardisation efforts around TDMRep.

4. What is, based on your knowledge, the degree of uptake of this specific opt-out solution among rightholders? (Please only respond in relation to the technical solution(s) for which you have experience in line with your response to question 2)

Opt-out Solution	Used in a very limited manner (e.g. sporadic use in one or more specific sectors /for one or more content modality)	Used in a limited manner (e.g. limited use in one or more specific sectors /for one or more content modality)	Used in an moderate manner (e.g. moderate use in one or more than one sector/for one or more than one content modality)	Widely used (e.g. consistently used across one or more sectors/for one or multiple content modalities)	Not aware
* C2PA TDM Assertions	◯	⦿	◯	◯	◯

* Please provide data or information on the uptake of any specific solutions, including in specific cultural sectors, in support of the reply related to "C2PA TDM Assertions":

1500 character(s) maximum

> While the C2PA framework itself has seen growing uptake in certain sectors, particularly for provenance and authenticity use cases, we have so far observed only limited adoption of the TDM-specific assertion functionality.

4. What is, based on your knowledge, the degree of uptake of this specific opt-out solution among rightholders? (Please only respond in relation to the technical solution(s) for which you have experience in line with your response to question 2)

Opt-out Solution	Used in a very limited manner (e.g. sporadic use in one or more specific sectors /for one or more content modality)	Used in a limited manner (e.g. limited use in one or more specific sectors /for one or more content modality)	Used in an moderate manner (e.g. moderate use in one or more than one sector/for one or more than one content modality)	Widely used (e.g. consistently used across one or more sectors /for one or multiple content modalities)	Not aware

* AI.txt	◉	○	○	○	○

Please provide data or information on the uptake of any specific solutions, including in specific cultural sectors, in support of the reply related to "AI.txt":

1500 character(s) maximum

> Uptake has been very limited and sporadic, and the initiative does not appear to be actively maintained.

4. What is, based on your knowledge, the degree of uptake of this specific opt-out solution among rightholders? (Please only respond in relation to the technical solution(s) for which you have experience in line with your response to question 2)

Opt-out Solution	Used in a very limited manner (e.g. sporadic use in one or more specific sectors/for one or more content modality)	Used in a limited manner (e.g. limited use in one or more specific sectors/for one or more content modality)	Used in an moderate manner (e.g. moderate use in one or more than one sector/for one or more than one content modality)	Widely used (e.g. consistently used across one or more sectors/for one or multiple content modalities)	Not aware
* Do not train registry (SpawiningAI)	◉	○	○	○	○

Please provide data or information on the uptake of any specific solutions, including in specific cultural sectors, in support of the reply related to the "Do not train registry":

1500 character(s) maximum

> In its early phase, the Do Not Train registry saw substantial uptake, with several million entries being submitted. However, the initiative does not appear to be actively maintained at present, and the registry itself is no longer publicly accessible.

4. What is, based on your knowledge, the degree of uptake of this specific opt-out solution among rightholders? (Please only respond in relation to the technical solution(s) for which you have experience in line with your response to question 2)

Opt-out Solution	Used in a very limited manner (e.g. sporadic use in one or more specific sectors	Used in a limited manner (e.g. limited use in one or more specific sectors	Used in an moderate manner (e.g. moderate use in one or more than one sector/for one	Widely used (e.g. consistently used across one or more sectors/for one	Not aware

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	/for one or more content modality)	/for one or more content modality)	or more than one content modality)	or multiple content modalities)	
* TDM.ai protocol (Liccium)	⦿	○	○	○	○

Please provide data or information on the uptake of any specific solutions, including in specific cultural sectors, in support of the reply related to the "TDM.ai protocol":

1500 character(s) maximum

> At the time of writing, the TDM.ai protocol has not yet been publicly deployed or used in production environments.

5. Are you using or are aware of other machine-readable solutions to express rights reservations or preferences in relation to TDM-processing beyond those identified by the EUIPO study? If so, please provide detailed information on such solutions, including on the technical characteristics (including maturity, technical implementability, resilience, scalability and granularity) and the degree of uptake (including across sectors and content modalities).

1500 character(s) maximum

> Please refer to section two of our most recent policy brief on this topic:
> https://openfuture.eu/publication/divergent-mechanisms-elusive-vocabularies/
> which includes a more detailed discussion of two additional initiatives beyond those covered by the EUIPO study: Cloudflare's Content Signals and the Really Simple Licensing (RSL) standard. At present, we do not have reliable information on the degree of uptake of either of these initiatives.

Section 2 - Call for expression of Interest to engage in the process to identify the technical solutions to be considered under Measure I.3 (b) of the CoP (Copyright Chapter)

The outcome of the consultation (section 1) will be used to guide the process that should lead to a list of generally agreed TDM opt-out protocols that GPAI model providers shall comply with in the context of their respective commitment under the CoP and their obligation under Article 53(1)c) AI Act more generally.

In order to take into account the position of the different stakeholders and to facilitate a general agreement on state of the art opt-out protocols, the process will consist of the following steps:

1) Stakeholders' consultation and call for expression of interest (current phase);

2) Online information session to present the EUIPO study and outline the process;

3) First online workshop on the draft assessment proposed by the Commission;

4) Second online workshop with a view to reaching a general agreement regarding the identified solutions;

5) Publication by the Commission of the final list of generally agreed TDM opt-out protocols.

The Commission is looking for stakeholders with legitimate interests to express **their interest to participate** in the follow-up workshops that the Commission will convene**.** You will have to explain your interest to participate in the process and how you can contribute to the future process, (for instance, bringing experience in development or use of TDM protocols and/or crawlers, experience in using TDM technology for AI development and training, experience in rights management information, contribution to the research on the topic of TDM, AI and copyright and related policy discussions). On this basis, eligible participants will be invited to the two workshops to discuss the assessment of the identified solutions and reach a general agreement.

Eligible stakeholder categories are (exhaustive list):

- GPAI model providers (signatories to the GPAI Code of Practice will all be invited by default)
- Rightsholders associations
- Service provider distributing copyright-protected content online
- Civil society organisation
- Entity that develops TDM opt-out protocol(s)
- Entity that develops crawlers
- Data aggregator
- Standardisation organisation

Eligible organisations must appoint maximum two representatives to participate to the process on their behalf. These participants must be responsible for overseeing relevant activities within that organisation. Associations representing rightsholders may select eligible representatives from within their members which possess relevant experience, knowledge and/or expertise on TDM rights reservation. Participants are expected to attend the workshops and to commit to contribute substantively to the process by providing feedback on the respective topics. Each organisation should submit a single application covering all of its appointed representative(s).

It is for the interested organisation to provide relevant evidence to demonstrate they belong to one of the categories of eligible actors and should have the required expertise or experience to contribute to the process. Organisations are only eligible if they are registered in the Transparency Register.

Participants will not receive monetary compensation for their input or for participating in the process.

*6. Are you interested to engage in the process based on bona fide discussions to help identify and agree on the opt-out solutions to be considered under Measure I.3 (1)(b) of the CoP (Copyright Chapter), including to be invited to the follow-up online workshops?

- ◉ Yes
- ○ No

*7. Category of eligible stakeholder the applicant organisation falls into:

- ○ GPAI model providers
- ○ Rightsholder associations
- ○ Service provider distributing copyright-protected content online
- ◉ Civil society organisation
- ○ Entity that develops TDM opt-out protocol(s)
- ○ Entity that develops crawlers
- ○ Data aggregator
- ○ Standardisation organisation

*8. Is the organisation located within the European Economic Area (EEA)?

- ◉ Yes
- ○ No

*9. Has the organisation existing or planned operations in the EU?

- ◉ Yes
- ○ No

*10. Please describe the relevant experience, knowledge and/or expertise your organisation (or member thereof) would provide to the process

1500 character(s) maximum

> Paul Keller has been closely following both policy and technological developments in this area. He is the author of multiple policy papers on machine-readable rights reservations and TDM opt-outs, and is the co-editor of the vocabulary draft currently under discussion in the IETF AI Preferences Working Group.

*11. Please provide the details of the organisation's representative(s) (maximum of two), including their first name, surname, a description of their position and tasks within the organisation (or member thereof) and technical expertise (as applicable). Please demonstrate as well that the representative(s) is/are responsible for overseeing the organisation's relevant activities.

500 character(s) maximum

> Paul Keller, see above

*12. Where relevant, please provide hyperlinks to information available online demonstrating the applicant organisation's activities or expertise as mentioned in question 10.

255 character(s) maximum

https://openfuture.eu/our-work/ai-and-creative-labor/

13. Please upload supporting documentation showing that (i) your organisation belongs to one of the eligible stakeholder categories, (i) your organisation has the relevant experience, knowledge and/or expertise and (iii) your organisation's representative(s) fulfils the respective requirements.

Only files of the type pdf,doc,docx,odt,txt,rtf are allowed

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