



**Response to the Reflection Document of DG INFSO and DG MARKT on a
“Creative Content in a European Digital Single Market: Challenges for the
Future”**

Sveriges Videodistributörer and Svenska Antipiratbyråns represents the major part of film producers and distributors in Sweden.

We support the joint statement given by FIAPF, IFTA and IVF and add the following comments.

Film production in Sweden employs people full of talent and ambition. The attractiveness of the industry to new generations on the labour market, the great interest of the general public in film, and its international success are witness to the fact that the craftsmanship and creativity are of a high standard. However, the industry has suffered greatly from unlawful use and time is running out to reverse the negative trend.


Although copyright infringement is not at focus in the Reflection Paper, the negative impact it has on legal services cannot be ignored. There are several legal alternatives to illegal file sharing and other downloading of illegally uploaded content in Sweden e.g. Voddler, Film2home, Ameibo, Headweb and SF Anytime.

It is however difficult for the providers of these services to compete with illegal file sharing. The Enforcement Directive 2004/48/EC was implemented in Sweden in

April 2009. It has had an immense positive impact on the legal services. Studies show that broadband users that file shares movies has decreased from 1 400 000 in Q3 2008 to 1 100 000 in Q3 2009¹. Another example is Film2home. Since November last year they have increased their sales six times. This shows the obvious; the success of consumer friendly legal services lies in the corresponding vessel to the access of illegal services. The services and access that can be offered to the consumers is in other words co depending on the environment for the legal services.

Furthermore, ISP involvement is vital. In fact it can be the most potential measure of solving the current situation. ISP involvement in combination with other measures such as information, can prevent further damage from piracy, and build a reasonable market environment for the legal services. It is our opinion that action at the community level is crucial in reaching this aim.

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¹ Mediavision "File Sharing and Downloading Q3 2009"