



STATEMENT to the “Comité des Sages” Cultural Heritage Digitization

CEPIC
Centre of the Picture Industry

CEPIC Members

CEPIC, the Coordination of European Picture Agencies, is an international federation of picture agencies and libraries (www.cepic.org). Our members include over 1,000 stock photo and footage libraries, major news agencies, art galleries and museums in 20 European countries. These agencies and libraries produce content as copyright holders; collect and distribute distribution rights on behalf of the visual creators they represent; market this creative material, still and moving images, in their country and worldwide through a professional network for online publications, advertising, magazines and book publishing.

Our members include some of the most distinguished museum libraries and historical archives. Many of our member libraries are active in the preservation of European Cultural Heritage and have built huge databases of works and related information.

We commend the efforts of the European Commission in supporting the project of the European Digital Library as an important European counterpoint to the American Google Book Registry. We support the concept of Europeana as a not-for-profit project aimed at education and research.

CEPIC's concern is that the important work of making Europe's cultural heritage and creativity available online should not jeopardize the viability of established and honourable business models based on cultural heritage contents. There is a risk that activities by a centralized organization, which is currently publicly funded, could undermine the creative economy – valuable economic activity in the private sector, as well as commercial income-streams to cultural heritage institutions.

Questionnaire

In general, our members polled in advance found the questionnaire of the Reflection Groups difficult to answer. It contains many assumptions which have not been tested in the real world, and which need to be articulated, not concealed. On the other hand, a number of essential issues are absent: the impact on the market and the notion of “cost”.

This Statement therefore wishes to address the economic problems not raised by the “Term of References” and the questionnaire.

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Costs

The “Terms of References” seem concerned with the costs of digitization only. However, the digitization of assets is only one part of the costs incurred by an image library.

Cataloguing activities also create expenses:

- Organizing material and making it accessible in a database
- Identifying and captioning material
- Improving search capabilities through the use of keywords and other controlled vocabulary

Adding suitable information for web distribution increases the distribution and usage value of images. This work, which is carried out by professional staff, is essential for the preservation of images and supports the work of researchers. We are concerned that Europeana repeats the mistakes of Google Books which has been criticized for poor referencing.

The sustainability of digital assets, once they have been created, is a major consideration in the preservation of cultural heritage. The “Terms of Reference” and the questionnaire contain no invitation to think about the costs involved, or to consider a business model which could provide this sustainability.

Duplication of Efforts

A number of cultural heritage organizations have trading companies with own commercial image libraries. A considerable amount of digitization is already being carried out by these image libraries. The digitization of their assets is partly financed by public funding and partly by the trading company in order to create income for the organization.

Any plan at national level, providing guidance to cultural institutions and to libraries within the framework of the Europeana project, should take into consideration that a extensive amount of material has already been digitized and that the commercial use of this material already creates income for these institutions and funds further digitization.

Effects on the Market

Europeana is potentially a great public service. However, its effect on the market place has not been tested.

In the UK, for instance, the BBC is obliged, as part of its governance, to carry out a “public value test” and also a “market impact assessment” for new projects, in a way to guarantee that public money is not being spent (and the BBC’s privileged market position is not being exploited) in ways which undermine the efforts of commercial players in the same market. Large scale EU projects, such as Europeana, should be subject to similar scrutiny.

In the event of Europeana allowing its material to be used for commercial purposes, re-use should not be free of charge, even if digitization was made possible by public funding. The project of Europeana should not undermine healthy market activity and the livelihood of Europe’s visual creators by creating a free stock image library.

Last but not least, any exclusivity clause provided to a private partner will adversely affect the market and possibly create a privileged market position which could be considered contrary to the free competition principles established by the EU Treaty.

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Solutions

Interference and duplication of effort should be avoided by taking into account the significant investment in digitization by commercial image libraries. The industry sector represented by CEPIC has already established technical and metadata standards which are of great value to the Europeana project.

Partnerships between Europeana and a number of institutions, including photo agencies and picture libraries, already exist, for example when Europeana is linked to the library providing the content ("View in context"). The Commission should extend this kind of relationship and enlarge the circle of partners. We support partnerships with private entities to make European Heritage available to the public and provide content to the project.

CEPIC would like Europeana to consider the benefits of working with established and honourable commercial models of licensing. We think that support from professional entities with extensive experience and knowledge on licensing visual contents will certainly enhance the quality of Europeana's service, with complete crediting of picture material including all artistic rights and professional translation of the caption. It can also help to address the sustainability of digital cultural contents and of Europeana itself.

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