

Evaluation of the Geo-Blocking Regulation *Feedback to the Call for Evidence*

Datum 10. März 2025

A. Preliminary remarks

VAUNET is the umbrella organisation of private audio and audiovisual media in Germany. The diverse business areas of the approximately 160 members include TV, radio, web and streaming offerings. The trade association aims to create acceptance for the political and economic concerns of the audio and audiovisual media on a national and European level and to raise awareness of the great socio-political and cultural importance of the industry in the digital age.

European film and TV content account for 51% of all films and TV broadcasted in the EU in 2023¹, underlining the significance of the European audiovisual media sector to the European market.

B. Key Points

We therefore highlight the following position:

- The audiovisual sector champions a crucial role in economy² and society, providing creative and diverse content. It is necessary to support the sector with regulatory frameworks that enable continuous provision of high-quality content to EU audiences. Therefore, the status of the audiovisual sector regarding the [Geo-Blocking Regulation \(EU\) 2018/302](#) should be maintained and the audiovisual sector should not be included in the scope of the regulation. This was also the conclusion of the first review in 2020.
- Geo-blocking is essential to the audiovisual-media sector, allowing them to cater to the linguistic and cultural diversity of the EU, thus fostering media pluralism and creativity.
- Removing this exemption would disable the territorial licensing model, leading to reduced investment, fewer content options, and consequently an increase in prices for consumers in already economically difficult times.

¹ cf. "Works on television –2023 data" – European Audiovisual Observatory: 8

² In 2021, cultural and creative industries contributed €477 to the European economy (cf. [SWD/2021/351](#)).

C. Geo-Blocking Secures Cultural Diversity in Europe

Geo-Blocking in the Audiovisual Sector is a Pillar of Media Pluralism:

The current legislation recognizes the unique nature of audiovisual media as a driver of creativity and cultural diversity, that relies on contractual freedom and territorial licensing to ensure financing, creation and distribution of audiovisual works. Since the audiovisual sector requires significant upfront investment, territorial licensing allows for the negotiation of exclusive rights for specific, regional markets with distributors, platforms, and broadcasters, thereby granting financial security and predictability of the market. By this means, producers are able to take creative risks – that would otherwise be too uncertain or costly – and aim for innovation, variety and culturally specific productions.

In addition, targeted funding and production enable audiovisual works to cater directly to various linguistic and cultural preferences of the consumers. Only by allowing contracts based on specific market conditions, social and cultural realities of various regions can be represented in audiovisual media. As a strong pillar of cultural and linguistic diversity, the audiovisual sector is reliant on specific markets and thus geo-blocking to provide diverse content and foster media pluralism – a value that becomes increasingly important to uphold in times of disinformation.

Negative Impact on the Industry and Consumers:

Hindering geo-blocking for the audiovisual sector would impact the entire industry. Consequently, local and diverse content could not be sustained by the producers, relevant productions would be replaced by one-size-fits-all content. This would ultimately lead to less availability and fewer content choices for the consumers. Currently, the competition for exclusive content leads to a multitude of audiovisual offers. Without territorial licensing, there would be fewer competitive choices and domination by a few global, non-EU, players. In order to ensure the economic functioning of the audiovisual industry, the higher licensing costs would need to be compensated. On the consumer side, this would entail direct consequences: a rise in subscription costs and a reduced availability of highly diverse content – or even both.

Without territorial exclusivity the audiovisual sector could not sustain the quality, diversity and cultural richness that define it. In order to protect media pluralism and ensure continued advancement of European content, geo-blocking must remain the foundation of the industry.