

Mrs. Borana Ajazi
Director of the Copyright Office
Secretariat of the National
Copyright Council
Ministry of Culture of Albania
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Brussels, 23 September 2025

Subject: Request for annulment of National Copyright Council's decision n.3 of 21 August 2025

Dear Director,

The Society of Audiovisual Authors (SAA) is the umbrella association of European collective management organisations (CMOs) representing audiovisual authors. Its 33 members in 25 countries manage rights for over 174,000 film, television, and multimedia European screenwriters and directors. The SAA's main objectives are: 1) to support and strengthen the economic and moral rights of audiovisual authors; 2) to secure fair and proportional remuneration for audiovisual authors for every use of their works; 3) to develop, promote, and advance the collective management of rights by member organisations.

We have been informed by FAAD, with whom we are in contact in view of a possible membership, about a decision by the National Copyright Council that we consider catastrophic for audiovisual authors in Albania.

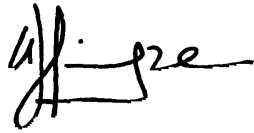
It is our understanding that the decision foresees no remuneration from the one-stop-shop of collective rights management for audiovisual authors for the communication to the public in various fundamental modes of exploitation, instead foreseeing a payment only for the retransmission of audiovisual works, to be shared equally with music authors. For the broadcasting and rebroadcasting of audiovisual works and the public performance of audiovisual works in hotels, bars and restaurants, only music authors would be entitled to collectively managed royalties collected by SUADA, in contradiction with best practices in Europe. We oppose to this decision which violates the right of audiovisual authors to opt for the collective management of their rights, and which deprives them of any possible fair remuneration for the exploitation of their works, putting them in a terrible financial situation.

Such a decision will impoverish Albanian non-music audiovisual authors, such as screenwriters and directors, whose creative role is the backbone of audiovisual works. Uses involving the communication to the public right cover a vast variety of exploitations. Without these earnings, the loss will be significant, and audiovisual authors will be deprived of a great part of their sustenance, diminishing the chances of properly financing their creative activities. Audiovisual authors will, more than ever, be forced to make filmmaking a secondary aspect of their lives – a hobby even – diminishing the quality of Albanian audiovisual works and participating to the ever-increasing presence of foreign (especially American) content at the cost of European audiovisual works and artistry.

The decision also puts the Albanian audiovisual CMO FAAD in a position that makes it impossible to operate as it should at the service of audiovisual authors, diminishing its chances to take part in the exchanges of the European and international community of audiovisual authors' CMOs at a crucial moment for its development.

The decision of the National Copyright Council is a direct attack on the creative community of the audiovisual authors in Albania. We urge you to reverse this decision, and to make the necessary changes to the Albanian copyright law if needed to secure a share of the collectively managed revenues to audiovisual authors.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Despringre', with a stylized flourish at the end.

Cécile Despringre
Secretary General