

July 1, 2022 - December 31, 2023

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# 2022-2023 COMMUNIA Annual Report

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May 2024

## Executive Summary

The report covers COMMUNIA's activities between July 1, 2022 to December 31, 2023. This corresponds to the first reporting period for our structural grant from Arcadia, a charitable fund of Lisbet Rausing and Peter Baldwin. During this roll-out stage, we have restructured the organisation in a way to allow it to operate independently and consolidate its role as one of the most important voices for progressive copyright reform in Europe.

The COMMUNIA Association has been advocating for the Public Domain and progressive copyright reform since its establishment in 2011, but has done so without a significant budget of its own for most of that time. The Arcadia grant issued to COMMUNIA in 2022 has permitted us to hire staff for the first time in the existence of the organisation and to professionalise our operations. In 2022, a Policy Director and a Legal Director joined COMMUNIA to manage day-to-day activities and coordinate advocacy work and strategic litigation efforts. Since 2023, a Policy Advisor based in Brussels has strengthened COMMUNIA's presence in the EU capital.

In addition to organisational development, we have conducted a multitude of activities to advance COMMUNIA's mission and, specifically, our [20 Policy Recommendations](#) launched in 2022. The report gives a detailed overview of our strategic priorities and efforts. Key achievements from this reporting period include:

- developing and promoting a comprehensive legislative proposal that aims at better enabling knowledge institutions to fulfil their missions in the digital environment;
- establishing ourselves as an important voice in the heated debate on the copyright implications of artificial intelligence training;
- improving the implementation of the transposition of the Copyright in the Digital Single Market Directive (CDSM Directive or Copyright Directive) in a number of member states;
- commissioning pre-litigation research and supporting the case of an activist in the cultural heritage sector;
- and starting an initiative for a declaration or legal instrument to protect the Public Domain at the international level with activists and experts from all around the world.

After these eighteen months, COMMUNIA is now a fully operational advocacy organisation with a strong presence in Brussels. Nonetheless, there are areas where we encountered challenges, which we have taken into account to adjust our strategy for 2024.

Advocating for copyright reform has been a challenge as EU policymakers remain cautious of reopening a highly contested file - even years after the CDSM Directive has passed. COMMUNIA is one of only a few actors in the open movement that remains fully committed to copyright reform. Yet we are working with new partners and are fostering intellectual exchange around emerging topics to maintain a community that is capable of acting.

# Organisational Development

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The Arcadia grant has permitted us to professionalise our operations and, most importantly, hire staff for the first time in the existence of the association. With the grant, the goal for our organisational development is to build a team of dedicated, expert staffers while maintaining an active membership base that actively contributes to COMMUNIA's activities. Over the reporting period, we have made good progress towards this end. In 2023, we finalised a lengthy process of revising COMMUNIA's statutes as an international non-profit association under Belgian law, reflecting the changes to our organisational model and new governance structure. Moreover, as of mid-2023, all positions established in the budget have been filled.

Longstanding member Teresa Nobre joined COMMUNIA in July 2022 as a Legal Director. Teresa is responsible for COMMUNIA's strategic litigation efforts as well as the analysis of legal texts and the drafting of legislative proposals. In October 2022, Justus Dreyling joined the team as Policy Director. Justus oversees COMMUNIA's policy work and leads on the organisation's planning and strategic processes. Under the revised statutes, the two managing directors are directly responsible for carrying out the day-to-day operations of the organisation and implementing COMMUNIA's strategic priorities. They have equal rights and report to COMMUNIA's board (formally administrative council).

In May 2023, we hired Leander Nielbock as a Policy Advisor based in Brussels. The Policy Advisor reports to the directors and works directly with decision makers in the EU institutions to promote policies in line with COMMUNIA's Policy Recommendations. Leander also supports COMMUNIA's public-facing communication efforts.

COMMUNIA continues to operate as a distributed organisation with two out of three staffers working remotely and team members based in a number of EU countries and the US. The majority of collaborative work is done online. As of May 2023, we are sharing an office room with Wikimedia Europe at the European Digital Rights (EDRi) office in Brussels.

# Mission and strategy

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COMMUNIA's mission is to foster, strengthen and enrich the Public Domain. We advance our mission mainly through public policy advocacy. Over the reporting period, we have also taken first steps towards defending usage rights in court via strategic litigation. Our work is guided by our founding document, the [Public Domain Manifesto](#) and our [twenty Policy Recommendations](#) launched in 2022. Our recommendations identify possibilities for reshaping copyright in ways that expand the public domain and strengthen the rights of users and all types of cultural creators. The geographical focus of our recommendations, and our work in general is Europe, but we also engage in some activities at the global level, most notably at the World Intellectual Property Organization (WIPO).

In 2022, we undertook an exercise to identify strategic priorities for our **advocacy work** and further operationalise our Policy Recommendations. In doing so, we assessed the urgency of reform across the various issue areas affected by copyright and considered strategic opportunities, in particular the European election cycle. We updated our priorities in 2023 to account for the copyright debate related to the surge of generative artificial intelligence (AI). During the reporting period, we have focused on three areas:

1. **Protecting knowledge institutions in Europe:** The CDSM Directive has introduced a number of flexibilities to European copyright law at the benefit of cultural preservation, education and research. However, knowledge institutions in many cases still face uncertainty when they seek to invoke copyright exceptions. As a result, they do not make use of the flexibilities to the full extent possible under law. We thus determined that exceptions for uses that promote the public interest need to be coupled with safeguards to give the beneficiaries of these exceptions additional legal certainty. Thinking about knowledge institutions holistically has allowed us to build a stronger narrative that has broader appeal to cultural, educational and research establishments and the organisations that represent them.

*This work builds on a number of our Policy Recommendations, including [#3](#), [#8](#), [#9](#), [#10](#), [#13](#), [#17](#), and [#19](#).*

2. **A legal mechanism to protect the Public Domain:** One of our founding principles established in the Public Domain Manifesto is that the Public Domain should be the rule and copyright protection the exception. Governments and private actors, however, are continuously chipping away at

the Public Domain – either through attempts to create new exclusive rights or by means of extending the scope of application of existing rights. Once a new entitlement exists, it is very hard to take it away again even if it leads to adverse outcomes. At the European level, a number of countries have cultural heritage codes that establish a quasi-copyright for works that are in the Public Domain, narrowing the possibility for the reuse of these works significantly. At WIPO, member states are discussing a treaty for the protection of broadcasting signals, which may extend to broadcast material even if the underlying works are in the Public Domain. We want to understand the legal framework in those countries and develop mechanisms, at the EU level and potentially also at an international level, to better protect the Public Domain against these challenges.

*This work builds on Policy Recommendations [#1](#), [#2](#), [#4](#), [#5](#), and [#14](#).*

3. **Preserving openness while promoting fair and balanced solutions for training AI:** The emergence of generative AI has raised a number of copyright-related questions. Currently, the most urgent and contentious issue is the use of copyright-protected works for the purpose of AI training. While the CDSM Directive includes a set of exceptions that is applicable to AI training and provides for a balanced solution, this has come under fire as some creators and rightsholders perceive generative AI to be an existential threat. Together with our member Open Future we have developed solutions, which would preserve the flexibilities for non-commercial research established in the CDSM Directive while allowing creators to exercise control over the commercial use of their works. We expect this debate to continue in the next few years and are prepared to engage in the debate as it shifts from AI input to output generated by AI.

*This work builds on Policy Recommendations [#2](#), [#9](#) and [#16](#).*

While the intense discussions surrounding the adoption of the CDSM Directive have made lawmakers wary of reopening this hot-button file, we also see this as an opportunity to use the new legal framework and challenge inconsistent or insufficient transpositions in court through **strategic litigation**. During the reporting period, we have started a strategic process to identify cases that are most likely to have a broader impact outside of the member state, in which we would support proceedings.

Finally, COMMUNIA's role continues to be that of a focal point for activists and academics committed to progressive copyright reform in Europe and beyond. This

allows us to develop state-of-the-art policy positions as new topics emerge and act as one of the most important voices for usage rights. We remain dedicated to **community building** and promote engagement among our members as well as outside through our involvement in other networks, most notably the [Access to Knowledge Coalition \(A2K Coalition\)](#).

## Impact

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Over the course of the reporting period, we have made significant progress towards our Policy Recommendations. In what follows, we provide an overview of the activities that we have carried out to promote our strategic goals. This is not intended to be an exhaustive list, but to highlight those areas where we have made the biggest impact. Not included here are our activities at the World Intellectual Property Organization, as they have been mostly covered by the Right to Research in International Copyright Law project where we were a subgrantee.

### Advocacy

## Protecting knowledge institutions in Europe

To advance our goal of improving conditions for knowledge institutions in Europe, we have reflected on potential legislative measures and developed an internal position document in the process. We have also undertaken important groundwork to put the issues addressed in this document on the agenda of EU lawmakers and have put in place all pieces for a campaign for a Digital Knowledge Act over the course of the European elections next year.

- Our internal position document was inspired by the comprehensive regulations of the digital sphere introduced by the current European Commission, such as the Digital Services Act, the Data Act, and the AI Act. Our positions are modelled after legislation in similar fields and exemplary laws from other countries and feature references to these legal texts.
- During the drafting stage, we have incorporated feedback from our members and other allies, in particular Knowledge Rights 21, to build consensus on our

goals. We have also shared our ideas more broadly with other civil society organisations to build support in our community.

- We have shared our ideas in meetings with policymakers.
- We have outlined a campaign to be carried out over the course of the European Parliament elections in early 2024 and have made arrangements for an in-person event in Brussels in March of 2024.
- In December 2023, we published an [op-ed on Euractiv](#) to kickstart the public campaign for a Digital Knowledge Act.

## **A legal mechanism to protect the Public Domain**

In 2023, we started exploratory discussions with a broad range of stakeholders to draft a declaration and potentially a legal instrument for granting the Public Domain a positive status in international law. Through these discussions, we have identified the most contentious issues as well as a legal approach to protect the Public Domain.

- With our member Felix Reda and his previous organisation Gesellschaft für Freiheitsrechte we hosted a two-day workshop with 31 participants on 23 and 24 March, 2023 in Berlin. We ensured diverse geographical representation and invited participants from both civil society and academia. While resource-intensive the workshop was a crucial step to build a truly global community of Public Domain Advocates and to identify areas of agreement and disagreement.
- Upon reviewing our extensive documentation of the workshop with the participants, two main questions emerged. How do we design a legal mechanism for protecting the Public Domain? Is the concept of the Public Domain compatible with non-Western understandings of knowledge governance? How do we address claims of indigenous and other marginalised communities who in good faith demand protections for and sometimes oppose any commercial exploitation of their cultural heritage?
- To discuss the latter question in greater depth, we held a follow-up workshop with Anasuya Sengupta and her organisation [Whose Knowledge?](#) at [Robert-Bosch-Stiftung](#) in Berlin on November 2, 2023. While some of the

issues remain unresolved for the time being, we now have a better understanding of the possible solutions.

- While this work was initially targeted at the global level (i.e. fora like UNESCO or the World Intellectual Property Organization), it quickly became clear that we also needed to direct efforts at Europe. A number of member states have exclusive rights that are functionally similar to copyright but grounded in different areas of law to restrict the reuse of Public Domain works. Italy, in particular, has started to aggressively enforce these rights. We have been tracking developments on our blog and have commented on this issue at various events, including [at the Creative Commons Global Summit in Mexico City](#). We have also commissioned a study to explore the compatibility of this approach with the CDSM Directive and, depending on the outcomes of this study, we will either support strategic litigation in this field or engage in advocacy work.

## AI training

When generative AI emerged, COMMUNIA provided critical expertise on the copyright dimension of AI, such as the conditions for using copyright-protected works for training purposes. Over the reporting period, we have positioned ourselves publicly as an organisation that promotes openness for research and transparency for creators. Through targeted outreach with our member Open Future, we advocated for a workable transparency provision for AI training data in the AI Act.

- In April 2023, we published our [Policy Paper #15 on using copyrighted works for teaching the machine](#) where we defended the existing flexibilities for text-and-data-mining. The CDSM Directive introduced two new and important exceptions for text-and-data mining, which are applicable to AI training. Article 3 gives non-commercial researchers the right to use works that they have lawful access to for automated analysis. Article 4 provides a similar exception for commercial applications, but gives creators the right to reserve their rights or opt out. Together these two articles provide for a fair and balanced framework but need to be backed by transparency requirements for AI developers, as it is otherwise impossible for creators to verify whether their opt outs have been respected.
- We have engaged in public and targeted outreach with policymakers to promote this interpretation. Specifically, we have presented our Policy Paper and, more generally, our ideas regarding AI and copyright on the [AI lab](#)



podcast by Information Labs and at various events, such as the roundtable discussion The Challenge of Generative AI in Copyright Reform Debates organised by PIJIP in Washington, DC, the panel AI & Copyright at the CC Global Summit, and the workshop AI, Creators and the Commons organised by CC and Open Future.

- In addition, we provided input into the negotiations on the AI Act, through targeted outreach and public statements, such as blog posts and our joint statement on the transparency of AI training data with Creative Commons.
- In early December, co-legislators reached an agreement on the AI Act. The final text features language that corresponds to our demands. Most notably, the text now includes transparency provisions meant to support the opt-out mechanism established by the CDSM Directive. Furthermore, a recital was added to clarify a part of the text, which we had repeatedly criticised as being too vague.
- Internally, we have held preliminary discussions on AI output and are prepared to address this side of the equation next year.

## Implementation of the Copyright Directive

As of December 2023, all countries (except Poland) that had to transpose the CDSM Directive into national law have done so, and we have wrapped up our advocacy efforts related to the implementation. We have supported partners in various countries, analysed national implementations, and engaged with academics and policymakers to prepare strategic litigation and lay the groundwork for future policy work.

- We have supported partners in a variety of member states to advocate for transpositions of the Directive that are in line with COMMUNIA's public guidelines for the implementation, as well as our mission and Policy Recommendations. In addition to the 14 countries in which we had worked prior to June 2022, over the reporting period, we have helped partners in 13 further countries. Notable success during the reporting period include:
  - the introduction of specific ex-ante safeguards for users in Sweden, the Czech Republic and (to a lesser extent) Bulgaria to prevent lawful uploads against wrongful blocking and removal by upload filters;

- the introduction of meaningful ex-post safeguards for the benefit of users of online platforms (e.g. measures against copyright abuse by online platforms and the implementation of a collective redress mechanism for users) in Sweden;
  - the introduction or the maintenance of open and unremunerated exceptions for education and scientific research in the Czech Republic, Latvia and Slovakia;
  - the introduction of a broad scientific research exception and the right to share the results of text and data mining for scientific research in Slovenia;
  - the requirement to use machine-readable means to opt out from commercial text-and-data mining on online content in Belgium, Bulgaria, Latvia, Portugal and Slovenia;
  - and the implementation of all the mandatory and optional legal limits to the new press publishers rights in Bulgaria, Greece, Latvia, Slovakia and Slovenia.
- We have analysed the implementation of the 2019 Copyright Directive in all EU member states. The results have been incorporated in various blog posts and, most notably, our websites [Eurovision DSM Contest](#), [copyrightexceptions.eu](#) and [DSM Directive Implementation Portal](#). The first two are benchmarking tools to highlight discrepancies as well as worst and best cases in the implementation of both the CDSM Directive and the 2001 Directive on the Harmonisation of Certain Aspects of Copyright and Related Rights in the Information Society among Member States. They have served and continue to serve as advocacy tools for users rights, allowing us to pinpoint inadequacies, inconsistencies, and positive examples when talking to policymakers.
  - In October 2022, we hosted an academic conference entitled [Filtered Futures](#) at [Robert Bosch Stiftung](#) in Berlin. We invited ten experts from all over the EU to discuss the compatibility of upload filters with freedom of expression and other fundamental rights in the light of the Polish challenge of Article 17 of the CDSM Directive before the European Court of Justice.

- We have coordinated and prepared a submission to a government consultation on e-lending in Germany (jointly submitted with Algorithm Watch, Gesellschaft für Freiheitsrechte, Open Knowledge Foundation Deutschland and Wikimedia Deutschland).
- In 2023, we hosted an online event to wrap up our work on the implementation, looking at trends and discussing policy options for the future. The event was well-attended, including from EU and US policymakers and major organisations from the film, music and publishing industries.

## Promoting the right to repair

“The right to repair should be fully protected at the EU level” is our Recommendation #11. In March of 2023, the European Commission published its draft for a Directive on common rules promoting the repair of goods. We have followed the work on the file closely and coordinated our outreach with Wikimedia Europe with the goal to restrict the use of copyright claims and technological protection measures, which prevent the repair of goods (e.g. by preventing changes to the operating software of a device even for the sole purpose of its repair).

- We engaged with lawmakers in the European Parliament through targeted outreach, notably including a meeting with the office of the Rapporteur on the file in September.
- We managed to introduce language into the European Parliament’s draft report, which restricts the use of contractual, hardware and software techniques that prevent repairs. While lawmakers have proven to be hesitant to actually refer to “copyright” due to the intensity of discussions around the topic, the Parliament’s text is a notable improvement compared to the original Commission draft.
- Our additions relating to hardware and software techniques made it into the final text which was approved during the last plenary session of the mandate. While, as expected, the final text does not contain a reference to copyright, we created a lot more awareness around the issue. To that end, during the plenary debate, the file’s rapporteur noted that intellectual property rights were still an unresolved issue in the context of the right to repair.

## **Improving access to audiovisual materials across Europe**

In our [Recommendation #15](#) we ask the EU to end geo-blocking of audiovisual content, as this practice goes against the goals of European integration and cultural diversity. Since 2021, we have participated in the European Commission's stakeholder dialogue on the subject. In collaboration with Open Future, we published a [proposal for a pilot project](#) as a contribution to this consultation in September 2022.

In late 2023, we supported a report from the European Parliament's Committee on Internal Market and Consumer Protection (IMCO) on the implementation of the 2018 Geo-blocking Directive, highlighting the need to improve access to audiovisual content. Our [public outreach](#) has led to us being interviewed and featured prominently by The Guardian in an [article](#) on the topic. Despite our best efforts, audiovisual content was removed from the scope of the review through amendments in the plenary vote on the report. Thus, we will need to reinvigorate our advocacy for a reform of the Geo-blocking Directive over the course of the European elections in 2024.

## **Contributions to the A2K Coalition, the Open Movement and Research**

We have been one of the driving forces behind the A2K Coalition both during the set-up phase, which predates the reporting period, and the public roll-out phase since the second half of 2022.

Together with the Right to Research in International Copyright Law at American University's Program on Information Justice and Intellectual Property, we have built the A2K Coalition's [website](#) launched in October 2022 and are currently maintaining it on behalf of the Coalition. Our Policy Director has also acted as the volunteer coordinator of the A2K Coalition since its inception and has managed the Coalition's activities over the reporting period (including, but not limited to, membership applications, processes to draft and agree on joint statements and quarterly calls).

In addition, we contributed to projects from the open community on a regular basis, including [Creative Common's Towards a Recommendation on Open Culture initiative](#) and [Open Future's study of the open movement](#). We also provided critical input to various research initiatives conducted by other civil society organisations, including [Centrum Cyfrowe](#), Education International, the Program on Information Justice and Intellectual Property and Europeana among others. Finally, we were invited to provide

input to academic research projects and were interviewed in the scope of a study commissioned by the European Commission.

## Strategic litigation

Over the reporting period, we developed a strategy for pursuing strategic litigation for users rights and the Public Domain in Europe and took first steps to carry out that strategy. Most importantly, we supported one case and commissioned two studies to identify potential avenues for further litigation.

## Reuse of digitised cultural heritage

We are currently supporting the case against the Musée Rodin initiated by Cosmo Wenman with additional funding from an Open Society Foundations tie-off grant. This is a case that very closely aligns with our mission and is essentially driven by the claimant. The first instance ruling was positive and we have decided to contribute material resources in order to achieve an even broader societal impact as legal proceedings continue.

We have used the remainder of this Open Society Foundations tie-off grant towards studies to explore additional cases for strategic litigation, specifically in two areas:

## Cultural heritage laws

We have commissioned an expert opinion from two legal scholars ([Giulia Priora](#) and [Giulia Dore](#)) to assess whether the Italian cultural heritage law is in compliance with EU law. This law limits the use of images of works whose term of copyright has already expired when those works are part of the collections of Italian museums and archives. While several Southern European countries have similar cultural heritage laws in place, the situation in Italy has rapidly deteriorated during the past year due to the aggressive enforcement of these legal provisions in court.

## Access to materials in digital formats by knowledge institutions

We have commissioned an expert opinion from two legal scholars ([Christophe Geiger](#) and [Bernd-Justin Jütte](#)) to explore ways for knowledge institutions to overcome the problem of access to copyrighted materials in digital format under fair and reasonable conditions. Recently, institutions such as libraries have been faced with the inability to obtain digital materials (e.g. ebooks) from major publishing houses because these companies refuse to licence their digital catalogue for certain public interest activities

(e.g. e-lending). The expert opinion will explore what positive duties must be imposed on rightsholders to ensure that the exercise of user rights that are justified by fundamental rights is guaranteed and made effective in practice in the digital world.

## Communication

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Our advocacy efforts rely on both direct and public communication. In this section, we are focusing on public communication, where we prioritised advertising our new Policy Recommendations and the set up of COMMUNIA as an independent organisation during the reporting period. We are generally transparent with our proposals and publicise many of our activities as long as there are no strong strategic counterarguments. COMMUNIA has a strict open access policy. All of our own publications (blog posts, policy papers and other publications) are licensed under [CC0](#). All guest contributions to our blog are at least licensed under [CC BY](#).

Our [website](#) is our main online communication channel. The COMMUNIA [blog](#) in particular is a known quantity in the European and, to a slightly lesser extent, global copyright policy space. Occasionally, we also publish more extensive and legalistic Policy Papers, studies or free-form publications. Since the start of the grant, we have published 41 blog posts and a policy paper. While we do not collect visitor data on our website for data privacy reasons, direct feedback from policy makers - who are our main audience - suggest that our blog is well-read. In addition, we produced a paper brochure with our new Policy Recommendations, which we use as a give away to policymakers and other stakeholders.

We were active on various social media platforms, including [Mastodon](#), [Bluesky](#), [LinkedIn](#) and, decreasingly on [Twitter/X](#). Posts on all of our social media accounts are regularly shared and interacted with by individuals from both within our movement and outside of it. To make ourselves less dependent on any single external channel, we will set up a bi-monthly newsletter in 2024 to inform interested parties about our activities and positions.

In addition to non-public events and workshops, we have hosted or co-hosted a number of well-attended public events, including a [joint expert workshop on copyright exceptions](#) with reCreating Europe (in Amsterdam on September 21, 2022), an [academic conference entitled Filtered Futures](#) (in Berlin on September 28, 2022), a

presentation of the book “Chokepoint Capitalism” with author Rebecca Giblin (in Berlin on June 27, 2023) and an [online salon on the implementation of the CDSM Directive](#) (December 12, 2023).

All three staff members (and other COMMUNIA members on behalf of the association) have been invited to speak at external events, including the [European Data Summit 2022, a panel on 3D scanning, preservation, access and revitalization of cultural heritage](#), a roundtable organised by the [European cooperation project CinEd](#), a guest lecture on IP and Access to Knowledge at NOVA School of Law, an academic conference [on the DSM Directive implementation](#) at the University of Minho and others.

## Financial

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The Arcadia grant is COMMUNIA’s main source of funding, covering our operational costs in the reporting period. In addition, COMMUNIA collects membership fees, which make for a much smaller portion of the overall budget. We would like to acknowledge, however, the in-kind contributions of many members who dedicate their time and other resources to COMMUNIA and our shared mission. Their working hours are not recorded, but indispensable to the success of our organisation. Finally, we inherited the administration of a tie-off grant from the Open Society Foundations to initiate strategic litigation around the implementation of the CDSM Directive.

### Budget vs. actual

At the beginning of 2023, we decided to extend our reporting period from June 2023 to December 2023 because it was foreseeable that we would not spend our entire first year budget until the initial deadline. The underspending is tied to us having to hire staff and setting up the organisation, a process that is now completed.

Our salary expenditures fall short of the budgeted amount. This, again, is a function of the hiring processes and previous commitments. At the same time, we had higher administrative expenditures than we would normally expect due to the fact that setting up payrolls and changing our statutes created additional costs. Moreover, the lower salary expenditures allowed us to invest more in events than we had initially planned. In the future, we expect those figures to be more closely aligned with the budget.

Around EUR 20,000 from the last tranche of the grant remain unspent, which have been allocated to cover deferred payments of salary and operating costs throughout January 2024.

## Financial Report and Budget for 2024

	<b>1st Year Budget</b>	July - December 2022	<b>Actual</b> January - December 2023	Reporting Period (Totals)	<b>2024 Budget</b>
<b>Expenses</b>	<b>€ 315,000</b>	<b>€ 83,450</b>	<b>€ 221,850</b>	<b>€ 305,300</b>	<b>€ 356,000</b>
Staff Costs	€ 240,000	€ 49,200	€ 145,200	€ 194,400	€ 239,000
Activity Costs	€ 51,000	€ 27,250	€ 48,250	€ 75,500	€ 96,000
Overhead Costs	€ 24,000	€ 7,000	€ 28,400	€ 35,400	€ 21,000
<b>Income</b>	<b>€ 315,000</b>	<b>€ 159,180</b>	<b>€ 202,940</b>	<b>€ 362,120</b>	<b>€ 365,500</b>
Arcadia Grant	€ 315,000	€ 157,500	€ 157,500	€ 315,000	€ 330,000
Membership Fees	€ 0	€ 1,680	€ 300	€ 1,980	€ 2,000
Other (OSF)	€ 0	€ 0	€ 45,140	€ 45,140	€ 33,500 <sup>1</sup>
<b>Result</b>	<b>€ 0</b>	<b>€ 75,730</b>	<b>- € 18,910</b>	<b>€ 56,820</b>	<b>€ 9,500</b>

<sup>1</sup> Remaining.




## About COMMUNIA

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The COMMUNIA association advocates for policies that expand the Public Domain and increase access to and reuse of culture and knowledge. It acts as a network of like-minded activists, researchers and practitioners based in Europe and the United States who seek to limit the scope of exclusive copyright to sensible proportions that do not place unnecessary restrictions on access and use.

COMMUNIA is grateful for the financial support of Arcadia, a charitable fund of Lisbet Rausing and Peter Baldwin.

For more information on COMMUNIA visit our website:  
[www.communia-association.org](http://www.communia-association.org); or contact us at:  
[communია@communია-association.org](mailto:communია@communია-association.org).

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