

07/09/2026

Statement: AI Strategy for the Cultural and Creative Sectors (Ares(2026)7389748)

BEDA – The Bureau of European Design Associations – welcomes the Call for evidence for ‘AI Strategy for the Cultural and Creative Sectors` (Ares(2026)7389748).

The design industry has widely adopted Artificial Intelligence (AI), from setting up AI infrastructure and agentic workflows for clients and partners, using AI for design business administration, as ideation sparring partners, and for creating Digital Twin Artefacts. Hence, the role of designer and of design has changed. Implementation of design, such as image generation tools, has made the creation of design elements more accessible to non-experts – with all the associated side effects such as copyright violation and AI-slob.

At the same time, there has been a greater demand for foundational work (such as problem definition, design research based on tacit and silent knowledge, vibe coding, AI testbeds and agentic workflows) for curatorial abilities and lately to client-customized specific AI infrastructure.

Even though it has been widely adopted, there are still several design fields—such as product design, industrial design, service design, and communication design—which have complex cultural and systematic needs where AI reaches its current limits, as human understanding and actions are not yet transferable into fully algorithmic sequences. So far, AI doesn’t yet understand emotions, nor is it yet able to replace human imagination.

BEDA envisions a future:

→ **where the Human-in-the-Loop is common practice** in the use of AI and AI, including Large Language Models, Multimodal AI, Generative AI, and Agentic AI and where these technologies are securely contained to prevent harms – not only in the context of industry but also to wider humanity and the planet.

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- **where the design and adoption of AI tools always considers both benefits and risks**, including the diversity, legality, and ethics of their training data and operation; whether they are transparent in their practices and/or open source; their environmental impact; and their genuine utility. AI should only be (thoughtfully) adopted where it offers real benefits.
- **where Design shapes AI in a human- and planet-centric way**. Personalised AI Models, with low energy consumption and ready-to-be trained status, focused on specific tasks to avoid jailbreak and hacking events and the threat coming with increasingly autonomous AI systems.
- **where AI literacy is not a hindrance either to the design sector or those sectors they work with**; and where designers' potential is elevated through informed use of AI, and where design expertise is valued for producing far more meaningful and beneficial work than the mediocrity currently resulting from generative AI.
- **where Artificial Intelligence feeds into European Union sovereignty** through needed infrastructure, talent deployment beyond research and EU competitiveness.

To achieve this, we ask for:

1. **Fund transdisciplinary design research as an AI foundation and infrastructure.**
Recommendation: Create a dedicated funding line bridging Horizon Europe, Digital Europe and AgoraEU for design research at the art-science-technology, protect existing inter-university and cross-faculty programmes and support the efforts to bridge the gap between science and industry.
2. **Open the skills instruments to design institutions.**
Recommendation: The AI Skills Academy, the "AI for business" masters programmes, the AI entrepreneurs lab and the AI fellowships should be accessible to design universities and academies on equal terms with business and technical faculties. More innovative, creative, and human-centred approaches are possible when disciplines meet and collaborate in art-science-technology research.

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3. **Use design as a public instrument: foresight, participation, civic AI literacy.**
Recommendation: Anchor participatory prototyping and design-led foresight in the Commission's Youth Check, the JRC foresight work, the NEB Communication and the public-sector AI toolbox. Fund public discourse formats — including lecture and debate series at universities, run jointly with students, design centres, and museums — as civic AI-literacy infrastructure. The Eurobarometer numbers in this Call for Evidence describe a public that is worried and unable to tell AI content apart; that gap is not closed by regulation alone.
4. **Guarantee compute and data access for cultural and design institutions.**
Recommendation: Reserve non-commercial access quotas in AI Factories and EuroHPC for cultural, artistic and design research. Extend the common European data space for cultural heritage to design archives, and support institutions in opening them under FAIR and easy to access licensing.
5. **Name design as a sector, and design research as a research field.**
Recommendation: Include design — product, communication, interaction, service, and design research — explicitly in the strategy's scope, its target audience, its subsectoral survey, and the reporting categories of the EU Cultural Data Hub. What isn't named isn't counted, funded, or consulted.
6. **Cover visual and applied work in the copyright and remuneration framework.**
BEDA welcomes the European Parliament's resolution on copyright and generative AI (Axel Voss Report, adopted 11 March 2026), which calls for mandatory disclosure of protected training data, a presumption mechanism in the absence of transparency, and a genuine licensing market for creators. This is a political signal to the Commission, not yet binding law, but it establishes the direction of action. The resolution names authors, press publishers and journalists, yet does not name designers or design outputs. **What isn't named isn't counted, funded, or consulted.** Generative image, layout tools, UX Generators or sketch-to-3D expose designers to the same training-data and remuneration questions raised for text, music and journalism, often earlier and with less institutional visibility.

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Recommendation: Any follow-up to the Voss Report or similar has explicitly include design outputs and reach, rather than assume they are covered by adjacent creative sectors. Additionally, transparency on training data, a workable opt-out mechanism, and remuneration models that reach freelance and self-employed designers must be established. Design outputs — such as, drawings, models, typefaces, interfaces, prototypes, products, services and more— should be named in the CDSM review alongside music, text and audiovisual work.

7. **Establish EUIPO as a trusted intermediary between AI Providers and Content Creators**

Recommendation: Establish BEDA as standing partner to the intermediary EUIPO as BEDA would like to highlight, the resolution (Voss Report) proposes EUIPO as a trusted intermediary for standardised opt-out formats. As a long-standing interlocutor of EUIPO, BEDA is well positioned to ensure design's inclusion in this role from the outset, rather than as a later correction.

Why is Design relevant for the AI Vision and Strategy for the Cultural Creative Industries and Sectors?

→ **Design is the missing translation layer.**

Apply AI is built on one number: only 13.5% of EU businesses and 12.6% of SMEs use AI. The strategy's answer is infrastructure, compute, and skills. What it never named is the discipline that studies why people adopt or reject technology — interface, interaction, service and product design, and the research behind them. Design is about "unlocking the competitiveness potential of the cultural and creative industries."

→ **Design is cross-sectoral, like the cross-portfolio of the DG EAC and DG Connect.**

Apply AI names eleven verticals — health, robotics, manufacturing, defence and space, mobility, telecoms, energy, climate, agri-food, CCS, public sector. Design work sits inside every one of them: from clinical interfaces, cockpit and vehicle interaction, digital twins, public service interfaces to communication and production. **The Public Sector chapter is the clearest case — the PAIR Pathway, the AI toolbox and the GovTech Incubator are all service-design problems described without the word.**

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- **Design research is applied foresight.**
Speculative and critical design produce testable public artefacts about futures — exactly the "culture of anticipation and evidence-informed policymaking". The *Culture Compass* commits to a State of Culture report and an EU cultural data hub; design research generates the qualitative evidence those instruments will otherwise lack.
- **Design education is where hybrid AI profiles already exist.**
Apply AI (3.2) promises to fund "AI for business" executive masters producing hybrid profiles for digital-intense sectors "such as mobility, energy, environment, cultural and creative sectors," plus an AI entrepreneurs lab and the AI Skills Academy. **Transdisciplinary design programmes are the existing delivery mechanism for that** — and several are being cut at exactly the moment the Commission proposes to build them. By supporting design education, the European Industrial Ecosystem will benefit, given the cross-cutting nature of design education.
- **Working conditions apply to designers with full force.**
Culture Compass 4.1: 7.9m cultural workers, nearly a third self-employed, 71% without sufficient social protection, permanent contracts 15.2 points below the general labour market. **Generative image and layout tools affect design labour earlier and more severely than most CCS trades**, yet designers are largely absent from the copyright debate, which is framed around music, audiovisual and text.
- **Visual and structural diversity is a sovereignty question.**
The *Culture Compass* protects linguistic diversity with real instruments. There is no equivalent for **visual and structural diversity** — including aspects such as typography, iconography, vernacular design languages and regional material culture. Current models are trained predominantly on non-EU data. This silently flattens cultural sovereignty, as no monitoring instrument currently detects it.

Sources

- Call for Evidence, *AI Strategy for the Cultural and Creative Sectors* (Ares(2026)7389748); COM(2025) 723 final,
- *Apply AI Strategy*, esp. §2.10, §2.11, §3.1–3.3; COM(2025) 165 final, *AI Continent Action Plan*, esp. §3.1, §4;
- *A Culture Compass for Europe*, esp. §3.2, §4.1–4.2, §5.1, §5.4, Annex 1 (Action 10, Q1 2027);
- Mission Letter to Glenn Micallef, 17 September 2024, "Culture and Sport" and "Youth and intergenerational fairness."

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→ European Parliament resolution of 11 March 2026, Copyright and generative artificial intelligence: opportunities and challenges (the "Voss Report"), adopted 360 votes to 71.

About BEDA

BEDA – The Bureau of Design Associations – is a not-for-profit organisation, founded in 1969 and based in Brussels. BEDA has 45+ members spanning 27 European countries representing thousands of Designers.

BEDA Members include publicly funded design organisations plus professional and trade associations, all of whom promote pioneering design nationally or regionally.

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