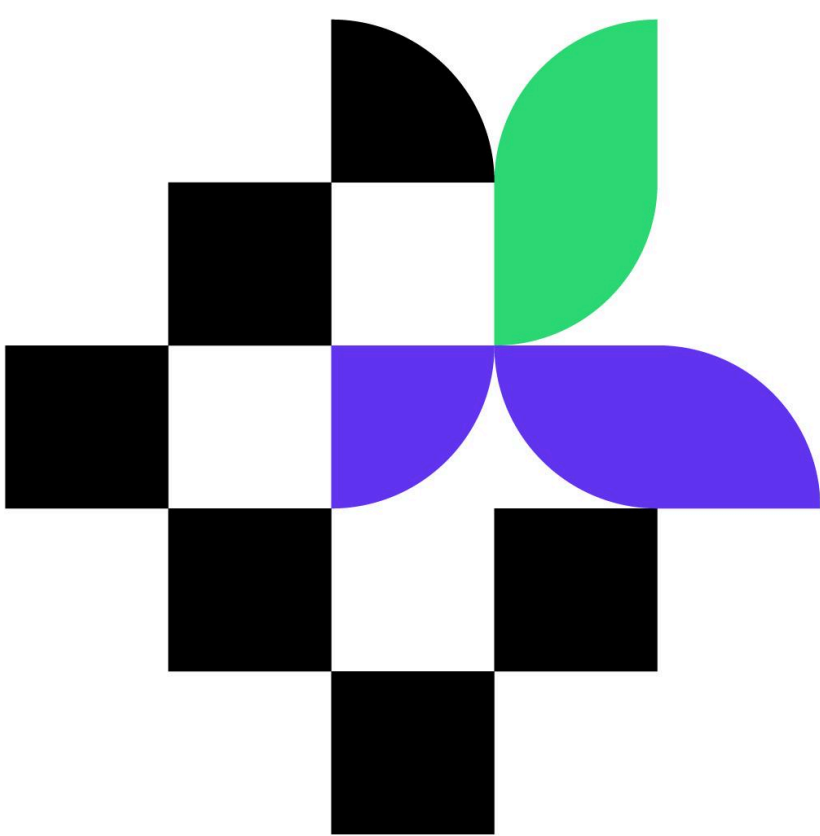




D2.1 Policy and best practices

Authors: Pauline Bissot, Solenn Houard, Anthony Collard, Antonios Vlassis (ULIEGE) ;
Mafalda Damâso, Sergio Goffredo (EUI).

Technical references

Project acronym	StreamSCAPES
Project name	Driving Sustainable Climate Transition of Video-On-Demand Platforms at a Time of Transformation
Project number	101177811
Type of action	HORIZON Innovation Actions
Granting authority	European Research Executive Agency
Project duration	1 March 2025 - 31 August 2028 (42 months)
Coordinator	Antonios Vlassis, University of Liège (BE), avlassis@uliege.be

Deliverable presentation

Deliverable no.	D2.1
Deliverable Name	Policy and best practices
Work Package no.	WP2
Lead Beneficiary	ULIEGE
Type	Report
Dissemination Level	Public
Due Date (month)	M18

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Research Executive Agency (REA). Neither the European Union nor the granting authority can be held responsible for them.

Citation

Bissot, P., Houard, S., Collard, A., Vlassis, A., Dâmaso, M., Goffredo, S. (2026). *D2.1 Policy and best practices*. Horizon Europe project StreamSCAPES (ID: 101177811). <https://www.doi.org/10.5281/zenodo.22080760>

This publication can be viewed online and downloaded as pdf, visit:
<https://www.streamscapes.eu/>

1st Edition 2025

Project DOI: <https://zenodo.org/communities/streamscapes>

Revision history and list of contributors

Version	Date	Authors
1	28.08.2026	Pauline Bissot, Solenn Houard, Anthony Collard, Antonios Vlassis (ULIEGE) ; Mafalda Damâso, Sergio Goffredo (EUI).

Executive Summary

StreamSCAPES brings together twelve academic and industry organisations to examine how decision-making in the Cultural and Creative Industries (CCIs) can contribute to the Sustainable Climate Transition (SCT), with a particular focus on Video-on-Demand (VOD) platforms. As VOD services occupy an increasingly important position within audiovisual ecosystems, the project considers sustainability across the interactions between production, distribution, digital infrastructures, business models, consumption practices, institutions and storytelling. It combines expertise from cultural and media studies, economics and business, environmental impact analysis, and policy and governance studies to identify existing practices, gaps, and opportunities to strengthen VOD's contribution to the SCT.

This deliverable presents the results of Task 2.1, which provides a comparative cross-national and multi-level mapping and assessment of policy measures shaping the SCT of the audiovisual and VOD sectors. The analysis covers nine European countries (Austria, Belgium, Denmark, France, the Netherlands, North Macedonia, Poland, Romania and Sweden) complemented by Nordic regional cooperation as a tenth case study. Rather than limiting the analysis to measures explicitly targeting environmental sustainability or VOD services, the report examines the broader environmental, climate, digital and audiovisual policy frameworks that directly or indirectly shape the sector. The research combines desk research with interviews involving key stakeholders. This comparative approach assesses not only which measures exist, but also their objectives, degree of institutionalisation, implementation and perceived effectiveness.

The findings reveal a policy landscape characterised by growing institutional capacity but limited legal formalisation. Across several countries, a relatively developed infrastructure for sustainable audiovisual production has emerged, supported by tools, standards, funding mechanisms, training and industry-led initiatives. The degree of institutionalisation nevertheless varies between countries, with public institutions playing a stronger coordinating role in some contexts and industry or regional initiatives compensating for weaker national frameworks in others. Across these different configurations, established audiovisual institutions and professional networks provide an important basis for further sustainability governance to develop.

However, this growing institutional density has not resulted in a comparable development of binding regulations. A central finding across the case studies is the near-total absence of a dedicated legal framework governing the climate transition of the CCI, audiovisual and VOD sectors. Existing approaches predominantly rely on voluntary measures, financial incentives and eco-conditionality attached to public funding. This dependence on administrative practices and institutional willingness can make environmental sustainability measures vulnerable to changing political priorities. The comparative analysis highlights differences in implementation capacity between markets, suggesting that sustainability requirements need to be accompanied

by appropriate financial, technical and organisational support. The challenge is therefore not necessarily to build governance structures from nothing, but to strengthen and more firmly anchor existing practices.

The same imbalance is visible across the audiovisual value chain. Sustainability measures are substantially more developed at the production stage than in distribution and digital delivery. Production has benefited from increasingly established carbon accounting tools, standards and funding requirements, while the environmental impacts associated with streaming infrastructures remain less integrated into audiovisual policies. This reflects two parallel regulatory logics: audiovisual sustainability is primarily addressed through incentives, eco-conditionality and voluntary standards, while digital infrastructures and services are governed through technical standards and reporting obligations. As a result, VOD environmental sustainability remains poorly integrated across the audiovisual value chain.

This is relevant for major VOD platforms. Across several case studies, global streaming services were identified as operating largely outside national audiovisual sustainability frameworks, while their transnational scale limits the capacity of individual national institutions to influence their practices. At the same time, their position across several stages of the value chain makes them important actors in the transition. The emerging inclusion of large corporate actors within broader European governance also creates new opportunities to connect platform obligations with audiovisual sustainability policies.

The comparative analysis further highlights the importance of cooperation across governance levels. Regional cooperation, illustrated by the Nordic case, can facilitate the development of shared standards while maintaining proximity to interconnected production environments. European frameworks and networks can meanwhile provide external incentives and opportunities for knowledge exchange, particularly where domestic sustainability governance remains less developed. At the same time, greater coordination does not imply uniformity. Differences in market size, resources, institutional capacity and production environments mean that common frameworks need flexibility to remain applicable across different national contexts.

The report also finds limited direct engagement with the Sustainable Development Goals. Of the 60 national measures analysed, only 7 explicitly refer to or draw on the SDG framework. Interviews similarly suggest that the SDGs function more often as a shared vocabulary or contextual reference than as an operational policy tool, notably because of the difficulty of translating broad objectives into sector-specific indicators and practices. At the same time, many existing audiovisual sustainability initiatives implicitly contribute to SDG objectives without using the framework as a source of legitimacy. This indicates that the primary obstacle for the post-2030 agenda is not developing entirely new practices but rather strengthening the links between international sustainability frameworks and existing initiatives within the cultural and audiovisual sectors.

In conclusion, the transition towards a more sustainable audiovisual VOD sector does not require building a governance structure from scratch. Further progress depends on strengthening the institutional and legal anchoring of existing initiatives, extending sustainability measures beyond the production stage, improving coordination across the audiovisual and digital policy domains, and supporting cooperation between national, regional and European actors. Requirements are also likely to be more effective when accompanied by appropriate financial, technical and educational support and when they retain flexibility to reflect differences in market size and institutional capacity. The challenge is therefore to move from an uneven set of sustainability measures towards a more coherent and durable governance framework across the whole audiovisual value chain.

Table of contents

Executive Summary	4
List of figures	10
List of tables	10
List of abbreviations and acronyms	11
StreamSCAPES: Overview of the project	14
Part 1 - Conceptual framework: Understanding the VOD value chain and literature context	16
1. Introduction	16
1.1. Objectives of T2.1	16
1.2. Methodology	17
1.3. Definition of Sustainable Climate Transition	21
2. The AV value chain	22
2.1. Content production	22
2.2. Digital distribution and consumption	23
3. From production to digital consumption: a literature gap	26
Part 2 - Legal and policy mapping	28
4. European policy frameworks	28
4.1. Climate-related European and international legislation	28
4.2. Sustainability in audiovisual frameworks	31
4.3. Sustainability policies governing digital infrastructures	34
5. Policy frameworks in ten case studies	37
5.1. Market overview	37
5.2. Austria	45
Institutional landscape	45
Political context	46
Instruments and their reception	47
Domestic and international cooperation	51
Policy gaps and challenges	52
Emerging trends and future prospects	52
5.3. Belgium	53
Institutional landscape	53
Political context	54
Instruments and their reception	54
Domestic and international cooperation	56
Policy gaps and challenges	56
Emerging trends and future prospects	59
5.4. Denmark	59

Institutional landscape	59
Political context	60
Instruments and their reception	61
Domestic and international cooperation	64
Policy gaps and challenges	64
Emerging trends and future prospects	65
5.5. France	66
Institutional landscape	66
Political context	67
Domestic and international cooperation	70
Policy gaps and challenges	71
Emerging trends and future prospects	72
5.6. The Netherlands	74
Institutional landscape	74
Political context	74
Instruments and their reception	74
Domestic and international cooperation	76
Policy gaps and challenges	77
Emerging trends and future prospects	78
5.7. North Macedonia	79
Institutional landscape	79
Political context	80
Instruments and their reception	80
Domestic and international cooperation	81
Policy gaps and challenges	83
Emerging trends and future prospects	84
5.8. Poland	85
Institutional landscape	85
Political context	86
Instruments and their reception	86
Domestic and international cooperation	89
Policy gaps and challenges	89
Emerging trends and future prospects	90
5.9. Romania	90
Institutional landscape	90
Political context	91
Instruments and their reception	92
Domestic and international cooperation	94
Policy gaps and challenges	94

Emerging trends and future prospects	95
5.10. Sweden	96
Institutional landscape	96
Political context	96
Instruments and their reception	97
Domestic and international cooperation	99
Policy gaps and challenges	100
Emerging trends and future prospects	100
5.11. A regional collaboration on environmentally sustainable filming criteria: the Five Nordics and the Nordics Ecological Standards (NES)	102
Institutional landscape and political context	102
Instruments and their reception	102
Domestic and international cooperation	104
Policy gaps and challenges	104
Emerging trends and future prospects	105
Part 3 - Cross-National Analysis: Enablers, Challenges and Policy Responses	106
6. SWOT analysis	106
6.1. Strengths	106
6.2. Weaknesses	108
6.3. Opportunities	110
6.4. Threats	112
7. Political pathways in the post-SDGs era	114
7.1. The SDG agenda and culture, in a post-2030 perspective	114
7.2. Current perceptions of the SDG agenda in the AV/VOD sector	115
7.3. Potential avenues between existing practices and the post-2030 SDGs	117
8. Conclusion	118
References	121
Annexes	145
Annexe 1: Questionnaire	145
Annexe 2: Consent form	147
Annexe 3: Typology of sustainable frameworks towards the AV-VOD sectors	151

List of figures

Figure 1 - Number of feature films produced	38
Figure 2 - Admissions	39
Figure 3 - Gross Box Office	39
Figure 4 - National Market Share	40
Figure 5 - Subscriptions to Subscription Video-on-demand (SVOD) services in Europe	41
Figure 6 - Top 37 European AV groups by number of SVOD subscriptions	41
Figure 7 - Top SVOD players in Europe by revenues	42
Figure 8 - Breakdown of services operated by top 50 groups for VOD services and Video-sharing platforms (VSPs) by region of final owner	43
Figure 9 - Breakdown of services operated by top 50 groups for VOD services and VSPs by region of final owner	43
Figure 10 - Number of VOD services established, by territorial coverage	44
Figure 11 - Number of VOD services available to consumers, by territorial coverage	45

List of tables

Table 1: Correspondence table for interviewees	20
Table 2: Summary of relevant EU regulation	35

List of abbreviations and acronyms

ADEME	Ecological transition agency, Agence de la transition écologique
ARCOM	Regulatory Authority for Audiovisual and Digital Communication, Autorité de régulation de la communication audiovisuelle et numérique
AV	Audiovisual
AVMSD	Audiovisual Media Services Directive
BFTP	Sustainable Film and TV Production, Bæredygtig Film og TV-produktion
BMLUK	Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology, Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie
CCA	Cinema and Audiovisual Centre, Centre du Cinéma et de l'Audiovisuel
CCIs	Creative and cultural industries
CDN	Content Delivery Network
CNA	National Audiovisual Council, Consiliul Național al Audiovizualului
CNC	National Centre for Cinema and the Moving Image, Centre National du Cinéma et de l'Image Animée
CNC-R	National Centre for Cinema, Centrul Național al Cinematografiei
CSA	Superior Audiovisual Council, Conseil Supérieur de l'Audiovisuel
CSRD	Corporate Sustainability Reporting Directive
DFI	Danish Film Institute, Det Danske Filminstitut
DR	Danish Broadcasting Corporation
DSA	Digital Services Act
EBU	European Broadcasting Union

ERDF	European Regional Development Fund
ESPR	Ecodesign for Sustainable Products Regulation
EED	Energy Efficiency Directive
EFAD	European Film Agency Directors Association
ELR	Energy Labelling Regulation
ESG	Environment, social and governance
ESRS	European Sustainability Reporting Standards
EU	European Union
FISA	Film Industry Support Austria
FWB	Wallonia-Brussels Federation, Fédération Wallonie-Bruxelles
VGFC	Association of Green Film Consultants Austria, Verband der Green Film Consultants Austria
GHG	Greenhouse gas
ICT	Information and Communication Technologies
KIPA	The Polish Producers Alliance
KOG	KommAustria Act , KommAustria-Gesetz
LAFC	Lower Austrian Film Commission
LFC	Łódź Film Commission
MAAP	Media and Audiovisual Action Plan
MS	Member States
NECP	National Energy and Climate Plan
NES	Nordic Ecological Standard
NFTVF	Nordisk Film & TV Fond
ÖFI	Austrian Film Institute, Österreichisches Filminstitut
PISF	Polish Film Institute, Polski Instytut Sztuki Filmowej

REEN	Reducing the Digital Environmental Footprint, Réduction de l'Empreinte Environnementale du Numérique
RoHS	Regulations on Hazardous Substances Directive
SCT	Sustainable climate transition
SDGs	Sustainable Development Goals
SEA	Sustainable Entertainment Alliance
SFI	Swedish Film Institute, Svenska Filminstitutet
SVOD	Subscription Video-on-Demand
TFEU	Treaty on the Functioning of the European Union
ULIEGE	University of Liège
UN	United Nations
VAF	Flemish Audiovisual Council, Vlaams Audiovisueel Fonds
VOD	Video-on-demand
VSP	Video-sharing platforms
WEEE	Waste Electrical and Electronic Equipment Directive

StreamSCAPES: Overview of the project

StreamSCAPES is a multistakeholder and multidisciplinary research project conducted under the auspices of the European Union (hereinafter 'EU') Horizon Europe programme dedicated to the ways in which decision-making in the Cultural and Creative Industries (hereinafter 'CCIs') is leading the Sustainable Climate Transition (hereinafter 'SCT') with a special emphasis on Video-on-Demand (hereinafter 'VOD') platforms as key parts of the audiovisual and cultural ecosystems. StreamSCAPES brings together twelve organisations in a consortium of academic institutions and industry beneficiaries to provide a mapping of data on best practices and methods that can unlock the underexplored potential of VOD services to accelerate Europe's green transformation. In line with the expertise of the participating institutions and partners, the consortium delivers a comprehensive analysis of VOD and the SCT from cultural and media studies, economics and business, environmental impact analysis, policy and governance studies.

In pursuit of its overarching aims and objectives, StreamSCAPES' research agenda rests on four key dimensions: examining production processes, industry practices and needs, as well as business models; consumption and everyday practices; institutions and policies; and storytelling and narratives. The project provides and analyses how these dimensions enable VOD platforms to advance the SCT and also addresses gaps that may currently limit the sector's capacity to collaborate with it. To activate this agenda, StreamSCAPES combines qualitative and quantitative research and pursues three main research streams, as follows:

- An interdisciplinary mapping and assessment of ways to substantially "green" VOD operations across the CCIs,
- Piloting the transformative potential of VOD through a hubs-based, future studies approach in a "Blue Skies" generation of ideas with a special focus on children and youth,
- Co-testing, with platforms and industry partners, the contribution of VOD to the SCT in line with the European Industrial Strategy and the European Green Deal.

The research outcomes of the abovementioned streams activities will be consolidated into scientific reports and academic publications and made available to the public through online and open-access databases. Additionally, the results and outputs of StreamSCAPES will provide paths to development of unique tools, such as:

- A SCT VOD certification, developing robust methods to measure the carbon footprint of VOD platforms,

- Designed business clinics that provide advice and guidance to VOD platforms on greening operations,
- A 'StreamSCAPES Dashboard' designed to make public data available to policymakers, professionals and citizens,
- Identify underutilised approaches that VOD platforms can use to boost the SCT,
- A 'First-Aid Kit Handbook' that empowers VOD professionals, audiovisual and cultural workers, and citizens to support the SCT in a bottom-up manner, with particular attention to youth- and children-engagement in practices and 'Blue Skies' imaginations towards innovation.

Part 1 - Conceptual framework: Understanding the VOD value chain and literature context

1. Introduction

1.1. Objectives of T2.1

Task 2.1 of the StreamSCAPES project provides a comparative cross-national and multi-level mapping and assessment of policy measures proposed or adopted in relation to Video-on-Demand (VOD) platforms and the Sustainable Climate Transition (SCT). It examines the regulatory frameworks, governmental policies and public initiatives through which environmental and climate objectives are being incorporated into the audiovisual and VOD sectors. Particular attention is paid to measures adopted at the national, regional and local levels, while relevant EU frameworks are considered as part of the broader regulatory and policy context.

The analysis covers nine EU Member States and associated countries: Austria, Belgium, Denmark, France, the Netherlands, North Macedonia, Poland, Romania and Sweden. In addition to these nine national case studies, the report examines Nordic regional cooperation as a distinct transnational case study, with particular attention to the development of the Nordic Ecological Standard. The report therefore comprises ten case studies in total: nine national cases and one regional cooperation framework. These cases capture considerable variation in the size and organisation of national audiovisual markets, the distribution of competences among public authorities, and the degree to which environmental sustainability has been integrated into audiovisual and VOD policy. The comparison therefore encompasses both countries in which environmental sustainability measures have become relatively institutionalised and contexts in which related policy discussions and initiatives remain at an earlier stage.

The task pursues two interconnected forms of comparison. First, its cross-national dimension identifies similarities and differences among the nine countries, including recurring policy instruments, institutional arrangements and implementation challenges. Second, its multi-level dimension examines how measures adopted by national governments interact with initiatives developed by regional and local authorities, film institutes, film funds, film commissions, regulatory bodies and other public or publicly supported organisations.

The report does not limit its scope to policies explicitly labelled as addressing the SCT or targeting VOD platforms. Dedicated measures remain limited in many of the countries examined. The mapping therefore also considers broader environmental, climate, digital and audiovisual policies that directly or indirectly affect VOD services and the wider audiovisual value chain. This includes regulatory obligations, funding conditions, financial incentives, environmental standards, carbon measurement and reporting requirements, training and knowledge-sharing initiatives, and public-private collaborations. Where relevant, a distinction is made between measures that apply specifically to VOD services, those that target the audiovisual sector more broadly, and cross-sectoral measures whose scope includes audiovisual and digital actors.

Beyond identifying existing measures, the task assesses their objectives, scope, degree of institutionalisation and perceived effectiveness. It develops a typology of the policy responses currently being pursued, identifies the logics underpinning them and examines the extent to which they facilitate or constrain the SCT. Particular attention is paid to common gaps, challenges and enabling conditions. The findings relate to emerging policy pathways concerning the inclusion of culture and the cultural and creative industries in frameworks succeeding the Sustainable Development Goals (SDGs).

This report first presents the methodology and the definition of the Sustainable Climate Transition (SCT) adopted in the study. It then reviews the audiovisual and VOD value chain, the relevant literature and the European policy framework, before examining ten case studies through a comparative market overview and national and regional policy mappings. A cross-national SWOT analysis identifies the main enablers, challenges and policy responses. The report then considers possible political pathways in the post-SDGs era and concludes with key findings and recommendations for policymakers and industry stakeholders. A complete typology of the examined frameworks can be found in [Annexe 3](#).

1.2. Methodology

The research was conducted between June 2025 and August 2026 and followed a comparative qualitative research design that combined desk research, policy mapping, a market overview, semi-structured oral interviews and written interviews conducted through questionnaires. These methods were used jointly to identify relevant policy measures, situate them within their institutional and sectoral contexts, and assess how they were implemented and perceived by relevant stakeholders. The research and preparation of the deliverable were led by ULIège, supported by EUI during the interview phase by reviewing the interview guide and jointly conducting selected interviews.

The desk research started in June 2025, covered 268 sources published between 2005 and 2026 and examined regulatory and policy developments at the EU, national, regional and local

levels. The material reviewed included legislation, policy and strategy documents, funding guidelines, programme documentation, institutional and evaluation reports, public consultations, market and industry reports, academic literature, and information published by relevant public authorities and audiovisual organisations. Particular attention was given to national ministries, regulatory authorities, film institutes, film funds, regional film commissions, public broadcasters and organisations involved in environmental sustainability initiatives in the audiovisual sector.

The document corpus was divided among the researchers and screened according to its relevance to the task. For each source, the researchers recorded the main information and findings in a table, which provided an overview of the evidence available for the literature review and each case study. The sources and corresponding notes were then used to identify relevant measures, institutional actors, recurring policy approaches, implementation challenges and gaps.

Sources were mainly consulted in English, although other languages of the case-studies materials were also included. The desk research was complemented by a comparative market overview based on quantitative indicators concerning film production, theatrical markets, VOD services and the main audiovisual and streaming actors. Its purpose was to show differences in the size and structure of the nine national audiovisual markets before examining their respective policy frameworks. Indicators on feature film production, cinema admissions, gross box office, and national market share (Figures 1-4) were compiled from the 2016-2026 editions of the Focus - World Film Market Trends report ([European Audiovisual Observatory, 2016-2026](#)) for the nine sample countries over ten years, and consolidated into a single table per indicator. Gross box office figures, reported in EUR from the 2025 edition onward rather than USD as in earlier editions, were converted using a reference EUR/USD exchange rate for each year to ensure consistency across the series. Figures 5-9 on SVOD subscription growth, leading VOD players (by revenue and subscriptions), and the geographic origin of major VOD groups were reproduced from the European VOD Dashboard data file ([European Audiovisual Observatory, n.d.a](#)), consulted in June 2026. Figures 10-11 on VOD services were based on data from the MAVISE database ([European Audiovisual Observatory, n.d.b](#)), accessed in June 2026. Services were categorised by territorial coverage (local, national, pan-European, regional, several countries), distinguishing established from available platforms. Entries corresponding to individual social media influencers, channel duplicates across platforms, and adult content sites were manually excluded.

The document analysis was complemented by 21 interviews involving 24 interviewees, comprising 16 oral semi-structured interviews and 5 written interviews conducted through questionnaires. Both formats were based on the same interview guide and addressed the same core themes. Participants included policy officers and sustainability specialists working in film institutes and film funds, sustainability project managers in the audiovisual sector, sustainability

consultants and other professionals with relevant expertise in environmental policy and practice in the audiovisual and VOD sectors. Given the technical complexity and relative novelty of the topic, publicly available information remains limited in several of the areas examined, particularly concerning emerging practices, implementation processes and the environmental governance of digital distribution. Expert interviews therefore constituted an important source of evidence for accessing specialised knowledge that is not yet systematically documented in public or institutional sources.

The oral interviews were conducted between early February and end March 2026. The five written interviews were distributed in April 2026 and returned by early June 2026. They provided an alternative for stakeholders who were unable to participate in an oral interview because of time constraints.

Potential participants were contacted by email and received a link to an online calendar tool through which they could select a suitable interview time according to their own availability and that of the researchers. This procedure simplified the scheduling process and limited the need for repeated exchanges. Interviews were conducted primarily in English and in French with French-speaking participants. Before taking part, participants received and signed an informed consent form explaining the purpose of the research, the processing of their data and the applicable data-protection procedures (see [Annexe 2](#)). Oral interviews were recorded, transcribed and anonymised before analysis.

The interview material was imported into the Corpus software and coded thematically. Tags were assigned to passages according to the principal topics addressed by respondents and to recurring themes emerging from the material. This process supported the identification of common patterns, differences and points of tension across the case studies.

The uneven distribution of interviews across the case studies reflected differences in market size, the number of relevant actors, the degree of centralisation of audiovisual and environmental responsibilities, and the extent to which public authorities or industry stakeholders had engaged with the SCT. In smaller or more centralised markets, responsibility was sometimes concentrated within a limited number of organisations or individuals. In other cases, additional actors from the audiovisual industry, VOD sector or public administration had developed their own initiatives, creating a broader pool of potential respondents. Recruitment was also more difficult where the SCT remained weakly institutionalised or was not yet perceived as a sectoral priority. More generally, the specialised nature of the topic means that the pool of individuals combining knowledge of audiovisual policy, environmental sustainability and, in some cases, digital distribution is limited in several countries. Consequently, a single interviewee could sometimes represent a significant source of expertise on a specific national issue. To reduce the risk of identification in such cases, respondents are described throughout

the report using broad professional categories rather than specific job titles or institutional functions.

Stakeholder evidence is therefore more extensive for some cases than for others. Interviews and questionnaires were used to complement the document analysis, and differences in the availability of evidence were taken into account when assessing each case. In some areas, stakeholder accounts constitute the main available source of information because the practices concerned are recent, technically specialised, sensitive or not documented publicly. Where a finding relies predominantly on one expert perspective, it is treated as context-specific evidence rather than as representative of the entire national sector. Where no dedicated policy or initiative could be identified, this indicates an absence in the document and stakeholder evidence collected rather than definitive proof that no relevant activity exists.

Table 1: Correspondence table for interviewees

Identification code	Profession/status of the interviewee
ITW1	Public policy expert
ITW2	Industry expert
ITW3	Public policy expert
ITW4	Public policy expert
ITW5	Public policy expert
ITW6	Public policy expert
ITW7	Public policy expert
ITW8	Public policy expert
ITW9	Industry expert
ITW10	Public policy expert
ITW11	Public policy expert
ITW12	Public policy expert
ITW13	Public policy expert
ITW14	Industry expert
ITW15	Public policy expert

ITW16	Public policy expert
ITW17	Public policy expert
ITW18	Industry expert
ITW19	Industry expert
ITW20	Industry expert
ITW21	Industry expert

The final analysis combined the findings from the document research with those emerging from the oral and written interviews. Stakeholder accounts were used to clarify the practical implementation of formally adopted measures and to identify initiatives, challenges and policy gaps that were not always visible in official documentation. Conversely, interview findings were checked against legislation, policy documents, funding guidelines and other written sources where such sources were available. Where document corroboration was not possible, particularly for emerging or scarcely documented practices, expert testimony was retained as a distinct source of empirical evidence and interpreted with appropriate caution. In these instances, the absence of corroborating documentation is itself relevant to the research question, as it reflects the limited availability and institutionalisation of knowledge in an emerging policy field. This triangulation of the available evidence supported a more consistent analysis across the ten case studies.

1.3. Definition of Sustainable Climate Transition

The Sustainable Climate Transition (SCT) is understood here not as a simple process of reducing carbon emissions, but as a broader transformation of the audiovisual ecosystem and VOD platforms. This understanding emerges from the findings of the StreamSCAPES Set-the-Stage Workshops Report¹, which aimed to establish a common basis for the next stages of the research by identifying the main challenges, dimensions and conditions of the environmental transition of the AV-VOD sectors.

The SCT concerns several dimensions of how the sector operates. Four main areas can be distinguished: 1) production processes, industry practices and business models; 2) consumption and everyday practices; 3) institutions and policies; and 4) storytelling and narratives. The transition therefore concerns the way audiovisual works are produced and

¹ See, Keinonen, H., Sarikakis, K., Tinen, P., Rossato Fernandes, M., Vlassis, A., Bissot, P., Houard, S., Goffredo, S., Dâmaso, M., Ranaivoson, H. & Komorowski, M. (2025). D1.1 PlaySCAPES: Set-the-Stage Report on Sustainable Climate Transition and VOD platforms. Horizon Europe project StreamSCAPES (ID: 101177811).

distributed, the infrastructures and technologies involved, consumption behaviours, institutional and regulatory frameworks, as well as the role of audiovisual works in shaping representations and practices related to environmental sustainability.

The Set-the-Stage report also identifies five complementary dimensions that help clarify what the SCT means in practice: awareness, metrics, everyday practices, value and business. The transition therefore requires sufficient knowledge of environmental impacts, the ability to measure them using reliable data and methods, the translation of this knowledge into concrete practices, the integration of sustainability into organisational values and decision-making processes, and its articulation with the economic realities of the sector.

The SCT must also be considered across the entire audiovisual value chain. It is not limited to production practices, but also includes post-production, digital distribution, content delivery and consumption. In the case of VOD, this means taking into account cloud infrastructures, data centres, Content Delivery Networks (CDN), transmission networks, the platforms themselves, as well as the devices used by audiences.

This approach necessarily considers collective features and interdependencies. No single actor controls all the environmental impacts associated with streaming.

An effective SCT is therefore “not merely technical but also infrastructural, epistemic and organisational” (Keinonen et al., 2025). In other words, the transition does not only rely on new technologies or more sustainable practices. It also requires the production and sharing of reliable knowledge, clearer distribution of responsibilities between actors, the integration of sustainability into organisational practices, and the development of common governance frameworks that enable coordinated action.

2. The AV value chain

Different stages are involved in film production, each with its own challenges and environmental impact. This section therefore aims to outline the different stages of the audiovisual content production chain, from pre-production to consumption by the final VOD user, with a focus on the carbon emissions generated in each step. It has the purpose of serving as a basis for the identification of the key stakeholders responsible for reducing emissions. It is structured into two overarching phases: content production and digital distribution, each one subdivided into three steps.

2.1. Content production

The audiovisual content production phase is divided into three main steps: pre-production, production, and post-production.

The pre-production phase includes the creative, administrative and financial planning of the audiovisual project. It is crucial because it guides the direction of the project, and the decisions made at this stage can determine the direct environmental impact of the rest of the project. This is why the employment of an eco-consultant, for example, can have a significant impact (Lopera-Marmol & Jimenez-Morales, 2021). The script is the most important element of this phase because it will determine the logistical, material and budgetary means of the filming. The script can also be decisive for the content of the audiovisual production: in the Creative and cultural industries (CCIs), the audiovisual industry has a real role to play in the promotion of certain habits and lifestyles, reinforcing the SCT (Lopera-Marmol & Jiménez-Morales, 2021; Bourns et al., 2020, Pomerantz et al., 2015). In this case, the impact on the environment is said to be indirect.

Production includes the creative and technical filmmaking phase. This is one of the phases that requires a massive mobilisation of resources, personnel and equipment. According to Bourns et al. (2020), production includes a reliance on fossil fuels as well as disposable materials such as sets and costumes often purchased for single uses. Location, transport, lighting and catering also generally involve a large ecological footprint (Lopera-Marmol & Jiménez-Morales, 2021; Bourns et al., 2020). It should be noted that the level of emissions generated by the production phase is also linked to the composition of the energy mix of the country where the production takes place: for example, in 2021, Germany's electricity grid was judged to be 30 times more polluting than the Swedish grid (Carbon Trust, 2021).

The post-production phase is used to assemble, finalise and technically improve the content to produce a finished product. This phase is mainly digital; its environmental impact comes from the use of resources for computers and data infrastructures, some of which share the same characteristics as will be explained below (Lopera-Marmol & Jiménez-Morales, 2021). While post-production relies on digital infrastructures similar to those used during distribution, it occurs only once for a given audiovisual work. By contrast, distribution-related emissions are multiplied every time content is streamed by end users.

2.2. Digital distribution and consumption

The distribution phase consists of making the audiovisual works available to the end audience, encompassing physical distribution in cinemas, television distribution and digital distribution, but also promotional events and marketing ([CNC, n.d.](#)). In this report, the focus will be on digital distribution only.

This phase can be subdivided into three steps: the provision of audiovisual work from its original format to the encoding and storage of the digitalised audiovisual work in a data centre, the packaging or transmission of the work through a network to the user, and finally, the consumption of audiovisual work by the final user (Seeliger et al, 2024; Afzal et al., 2024). According to Afzal et al. (2024), the emission of greenhouse gas (GHG) is distributed as follows between those steps: 72% comes from the end-user device (user consumption), 23% comes

from the data transmission through the network (content transmission), and 5% comes from the data centres (encoding and storage). These figures should nonetheless be read with caution, as estimates of streaming's carbon footprint remain highly contested. Depending on the methodology used, estimates of CO₂-equivalent emissions per hour of streaming range from 72-216g (Anders and Andrae method) to 280g (Shift Project), while estimates of electricity consumption per hour diverge by a factor of 25 to 53 between the IEA and the Shift Project (Batmunkh, 2022; Cunliff, 2020). This divergence stems from differences in methodology, the rapid pace of technological change, variation in national electricity mixes, and, according to some critics, an incentive for certain calculators to understate results in order to reassure industry stakeholders (Marks et al., 2021). Given this lack of consensus, the figures cited throughout this section are used to illustrate broad orders of magnitude and structural trends rather than as precise or stable values.

Audiovisual Content provisioning consists of “ [the] encoding, packaging, and [storage of] videos in different formats, resolutions, and bitrates and storing them on a Content Delivery Network (CDN).” (Afzal et al., 2024, p.2). This step takes place mainly in data centres, which are buildings dedicated to the housing of servers, with a controlled electricity supply and climate. Data centres vary in size from a server closet to a hyperscale data centre (Marks et al., 2021), and their impact on SCT can be summarised in three main points. First, to ensure that online content is continuously available, even in episodes of one data centre malfunction, the content is replicated in several other data centres, with around 30% of them running permanently, regardless of demand (Marks et al., 2021; Elavarasi et al., 2025; Sharma & Dash, 2022). Second, a significant proportion of servers remain unused, approximately 25% of physical servers and 30% of virtual ones, despite the availability of energy-saving “sleep mode” options, which are rarely activated due to concerns about potential performance degradation (Kemna et al., 2020). Third, the storage and processing of data in these facilities require constant cooling, making data centres particularly energy-intensive (Afzal et al., 2024; Elavarasi et al., 2025). This encoding process is realised with codecs, which allow for the conversion of the original audiovisual file into different formats associated with different quality levels for a minimum of bandwidth (eg. HD or 4K). The choice of a codec is crucial for carbon emissions, as a lighter file will travel faster but needs more energy for decoding, but a heavier file will need more energy to travel through the network.

Once packaged into different formats, the files are stored into multiple data centres and are made available to the user through a CDN (Afzal et al., 2024). Audiovisual content delivery, also referred to as content transmission, involves the distribution of data through CDNs and network infrastructures. The CDN is composed of multiple interconnected elements and allows users to access any content at any time, which is the reason why replication is massively used. When a user requests a piece of content, the first segments of the video become available within a few seconds, while the system progressively retrieves the remaining parts from the origin server through the CDN (Afzal et al., 2024). The transmission of the content is made possible through an entire physical network infrastructure, from the data centre of origin to the end-user (Afzal et

al., 2024; Marks et al., 2021). While transferring data from the server to the end user entails significant energy consumption, the infrastructure is shared by all internet users. Consequently, estimating VOD's specific share of this shared infrastructure remains methodologically complex (Carbon Trust, 2021; Afzal et al., 2024).

The final phase of the VOD value chain is the decoding and displaying of the content by the final user (Afzal et al., 2024). This phase is itself divided into three steps: content retrieval, video decoding, and video display. First, when the video is retrieved from the CDN, different factors influence energy consumption and related emissions, including the transmission protocol, network type (LTE, Wi-Fi, or Ethernet), video quality, and the type of device used (Afzal et al., 2024). Next, the video is decoded to be read by the end-user device. As discussed before, the choice of codec can significantly affect the energy required for decoding (Afzal et al., 2024). Finally, the content is displayed on the device. This step is particularly energy-intensive, as the screen must remain active during playback, and bandwidth is consumed continuously (Afzal et al., 2024). A large part of VOD consumption is directly linked to user choices, and studies repeatedly emphasise that end users are generally unaware of the environmental impact of their streaming behaviour (Carbon Trust, 2021; Beuscart et al., 2023; Nhi et al., 2024). Different devices and display technologies have distinct energy footprints, but in general, it is acknowledged that terminals are responsible for 65-90% of the overall environmental impact, including emissions from both manufacturing and usage (Meyer et al., 2022), with a majority of this impact generated when manufacturing the device (Keilbach, 2025). For example, screen size plays a role: smaller screens typically consume less energy, except in the case of mobile phones, because manufacturing emissions dominate lifetime energy use (Marks et al., 2021). The display technology (LCD, OLED, QLED), as well as settings such as brightness and colour, further affect energy consumption (Afzal et al., 2024). It should, however, be noted that because these devices are used for a wide range of daily activities beyond audio-visual consumption (communication, browsing, and productivity), their total manufacturing and operational footprint cannot be entirely attributed to video streaming. User behaviour also matters. For instance, content may be played without being viewed, such as on YouTube, where a "sound-only" mode could reduce annual GHG emissions by 6% (Suski et al., 2020). Video resolution is another major driver of energy use: higher-quality videos require faster CPU processing and greater bandwidth. Reducing resolution from Full HD to standard can reduce network speed requirements by a factor of three and cut carbon emissions by 26% (Meyer et al., 2022).

While the VOD value chain can be analytically divided into production, distribution, which includes provisioning and transmission, and consumption, these stages remain interconnected. Decisions taken during content creation influence distribution requirements, while platform design and user practices shape the environmental impacts associated with audiovisual content consumption. Understanding sustainability in the VOD sector therefore requires considering the value chain as a whole rather than as a set of independent stages. Yet, as the next section demonstrates, existing scholarship tends to examine these dimensions separately, leading to fragmented understandings of environmental responsibility and governance.

3. From production to digital consumption: a literature gap

The literature addressing the environmental impact of the audiovisual sector can be seen as split into two isolated fields, with Cultural and Creative Industries (CCI) studies on one side, and digital and streaming literature with a special focus on environmental considerations on the other. This disciplinary divide creates a complex understanding of the VOD value chain, blurring the identification of responsible actors and the development of coherent governance responses.

The literature addressing the environmental impact of audiovisual production is rooted in CCI studies, approaching sustainability primarily through the lens of professional practices, institutional governance, and narrative content. A first strand of this literature maps the production process itself across its pre-production, production, and post-production phases, identifying decisions made early in the process, particularly within the script, as decisive for the environmental trajectory of a project (Lopera-Marmol & Jiménez-Morales, 2021). A second, more empirical strand of this literature quantifies the footprint of production itself. Large-scale productions have been estimated to generate around 2,840 tonnes of CO₂ equivalent, with energy consumption alone comparable to five days of Times Square's electricity use (Bourns et al., 2020). This kind of research has fuelled the development of several carbon calculators and certification schemes across Europe (including Green Producers Tool, Albert in the United Kingdom, Carbon Clap in France, E-Mission in Belgium, and the Greenshooting Calculator in Germany) alongside growing institutional engagement from national film agencies (Sørensen & Noonan, 2022; Kääpä & Vaughan, 2022).

By contrast, the literature on the environmental impact of digital infrastructures and streaming originates in large part from computer science research, and is structured around the technical architecture of data transmission. A foundational finding here is that, by 2020, the carbon footprint of information and communication technologies (ICT) had already overtaken that of the aviation sector, accounting for around 1.9% of global GHG emissions, of which around one third was attributed to streaming (Marks & Przedpelski, 2021). In the following years, some insightful reports with different methodologies have tried to determine the carbon impact of the digital world, leading to debates, particularly around measurement itself. For example, the Shift Project's 2018 report, which called for a strategy of "digital sobriety", estimated that streaming alone could account for more than 1% of global emissions (Efoui-Hess, 2019). These figures have however been contested by the International Energy Agency and Carbon Brief, demonstrating that these early models overstated energy intensity by a factor of 25 to 50 (Cunliff, 2020). Beyond these energy efficiency debates, recent research warns against "rebound effects," arguing that technical efficiency gains alone cannot guarantee long-term sustainability unless other environmental criteria are embedded directly into cloud computing architecture (Pendergrass et al., 2019).

Despite addressing different segments of the audiovisual value chain, these two bodies of literature rarely interact, operating at different units of analysis: the individual production, on the

one hand, and the ICT sector as a whole, on the other. Across both literatures, however, a common question concerns where the responsibility for this consumption lies. Within production-focused research, responsibility is individualised at the level of specific roles, sustainability coordinators tasked with implementing measures on set (Sørensen & Noonan, 2022). However, these actors are frequently described as lacking the authority to implement structural changes, leading to what can be characterised as reactive damage management rather than systemic prevention (Sørensen & Noonan, 2022). This tension regarding responsibility is even sharper in the digital and streaming literature. In different studies, the environmental responsibility has repeatedly been attributed primarily to end users' consumption habits (Bingöl et al., 2023; Keilbach, 2025; Istrate et al., 2024; Sörensson & Ghannad, 2025), to device manufacturers (Keilbach, 2025; Sörensson & Ghannad, 2025), or to the carbon intensity of national electricity grids over which the streaming platforms have no direct control (Keilbach, 2025; Munch, 2025). Such framings, while not necessarily unfounded, have been criticised for ignoring the responsibility platforms could have for the infrastructures they use and the demand they generate (Keilbach, 2025; Jancovic & Keilbach, 2023; Lobato, 2019). While empirical studies show that users remain largely unaware of their streaming footprint, platforms do little to measure or manage the additional network demand their services generate (Nhi et al., 2024; Sörensson & Ghannad, 2025; Ioanid & Iliescu, 2024; Lobato, 2019). The resulting transparency efforts have accordingly been described as largely performative (Keilbach, 2025).

Taken together, these two literatures reveal a marked asymmetry. The CCI-rooted literature on production has, despite its internal critiques, produced an identifiable set of actors, metrics, and institutional responses, on which governance instruments such as certification schemes and, more recently, regional standards have been built. The digital and streaming literature, by contrast, documents a comparably significant environmental footprint, but one whose measurement remains contested and whose responsibility remains highly diffuse. This raises the question of whether public authorities reproduce this asymmetry by concentrating sustainability efforts on audiovisual production while paying comparatively less attention to digital distribution infrastructures and platform governance.

Part 2 - Legal and policy mapping

Having outlined the different stages involved in the production of audiovisual works, from the pre-production phase to the consumption phase, and having identified the most environmentally impactful stages, this section now turns to the legislative frameworks that regulate the environmental impact associated with VOD services.

In order to provide a comprehensive mapping of the relevant regulatory landscape, it is necessary to distinguish between two broad categories of instruments. Hard law refers to legally binding obligations such as directives, regulations and national legislation that impose enforceable requirements on states, companies or other actors, and whose non-compliance may result in sanctions. Soft law, by contrast, encompasses non-binding instruments such as recommendations, guidelines, voluntary commitments, action plans and incentive-based schemes, which orient behaviour without creating legal obligations. In the context of the VOD sector's SCT, both types of instruments coexist and interact: binding climate and digital infrastructure regulations sit alongside voluntary industry initiatives, eco-conditionality schemes attached to public funding, and coordinating frameworks that rely on dialogue and best-practice sharing rather than legal constraint. Understanding this distinction is essential to assessing the actual normative force of the measures identified in this mapping and their capacity to drive structural change in the sector.

This legal and policy mapping is divided into two main sections. The first one examines at the European and international levels measures in the field of climate governance, legislative instruments governing the audiovisual sector and digital infrastructures. The second section focuses on the 10 national case-studies and is structured around four themes: (1) actors and narratives; (2) policies and measures; (3) stakeholder collaboration; and (4) policy gaps, challenges and future directions.

4. European policy frameworks

4.1. Climate-related European and international legislation

At the international level, one of the most significant frameworks supporting the SCT is the Paris Agreement, adopted in 2015, which aims to limit the increase in global average temperature to well below 2°C above pre-industrial levels, while pursuing efforts to keep it below 1.5°C (UNFCCC, 2015). "The Paris Agreement does not mention the audiovisual sector, as it aims to have a global effect on all GHG-emitting human activities. However, it is the starting point for many pieces of legislation [...]" (Munch, 2025, p.21). This agreement primarily aims to achieve an overall reduction in GHG emissions generated by human activities. While it does not

contain any provisions specifically targeting the audiovisual sector, the sector is implicitly included within its broader scope (Munch, 2025).

Another international framework that acts as a reference point is the Sustainable Development Goals (SDGs) elaborated by the United Nations (UN) for Agenda 2030. Also adopted in 2015, these 17 goals cover several dimensions of sustainability. They are designed to respond to the various challenges currently facing the world and to provide a roadmap for achieving a more sustainable future for all. Four of them are directly or indirectly related to the climate: SDG 13 (Climate action), which aims to combat climate change; SDG 7 (Clean Energy), which is directly linked to SDG 13 in terms of combating global warming, SDG 9 (Infrastructure), which calls for sustainable industrialisation that promotes economic growth, social development and climate action, and SDG 12 (Sustainable Consumption and Production), which seeks to protect the planet's natural resources. These goals are mainly used as a reference to be followed but are not binding (Kopeć & Materska-Samek, 2023; Raszkowski & Bartniczak, 2019; [UN, n.d.](#)).

At the European level, the climate transition is enshrined in a policy framework aimed at achieving climate neutrality by 2050, covering various areas such as energy, transport, industry, and digitalisation. This European Green Deal was formally presented by the EU Commission in 2019 through a communication and sets a strategic vision for the EU's climate and environmental transition. Rather than constituting a single legislative instrument, the Green Deal outlines guiding principles and priority areas for action, acting as a political framework. While the Green Deal does not specifically target the audiovisual or VOD sector, it establishes horizontal principles, such as energy efficiency, decarbonisation of infrastructures, and sustainability reporting, that indirectly affect digital and cultural industries, particularly through regulations on data centres, corporate reporting obligations, and public funding priorities ([European Commission, 2019](#); [European Commission, 2020b](#); [European Parliament and Council of the European Union, 2021](#)). These objectives have been translated into binding and non-binding instruments, translating the EU's political ambitions into various legal obligations, policy measures and financial mechanisms. ([European Commission, n.d.b](#); [European Commission, 2019](#)).

The European Climate Law, adopted in 2021 and based on the Green Deal, legally enshrines the goal of reducing GHG emissions by at least 55 % by 2030 compared with 1990 levels. This regulation does not specify concrete sectoral measures; rather, it provides guidelines to inform new EU legislation or policy to ensure consistency with the established trajectory. All sectors of activity and economic actors within the EU are bound by this framework, but concrete implementation is left to the discretion of Member States (MS) ([European Parliament and Council of the European Union, 2021](#)). Since this is a regulation, it is directly applicable in MS as soon as it is published, without requiring national transposition.

Building on the Climate Law, which sets out a legal ambition, Fit for 55 is a legislative package of 12 proposals to implement that ambition in concrete terms. The package proposes

regulations and directives with a specific sectoral focus, with the aim of reducing GHG emissions by 55% by 2030 and achieving climate neutrality in the EU by 2050.² ([European Council, n.d.](#)).

These legislative instruments are accompanied by financial instruments designed to finance the ecological transition. The European recovery plan, entitled Next Generation EU, aims to revive the European economy post-COVID. To this end, it emphasises the importance of a dual transition, towards both a clean, sovereign and inclusive economy and a low-carbon digital industry. Beyond requiring Member States to support the transition towards climate neutrality, the Recovery and Resilience Facility also stipulates that at least 37% of each national Recovery and Resilience Plan must be allocated to measures contributing to climate objectives. ([European Commission, n.d.c](#)).

In line with this approach and to finance the ecological transition, the EU has adopted the green taxonomy, a classification system that allows economically sustainable activities to be categorised according to their environmental impact. Private investment is therefore directed and mobilised to achieve the objectives set by the Green Deal. The taxonomy regulation is based on the Paris Agreement and the Green Deal to define the criteria according to which an activity can be designated as sustainable ([European Parliament & Council of the European Union, 2020](#))³

The Corporate Sustainability Reporting Directive (CSRD) constitutes another instrument adopted by the EU in 2022. Aligned with the Paris Agreement and the goal of climate neutrality by 2050, it initially required EU companies with more than 250 employees, as well as large non-EU companies with substantial turnover (€50 million or more in net turnover or €25 million or more in total assets), to disclose the pollution they generate and the measures they take to mitigate it (Munch, 2025). Since the adoption of the Omnibus Act in December 2025, substantial changes have been made to the CSRD, raising the thresholds for compliance to 1,000 employees and €450 million or more in turnover, de facto excluding a large proportion of the companies initially targeted by the directive ([PWC France, 2025](#)). Smaller European companies are therefore not subject to these reporting obligations. While not targeting VOD platforms' activity, the CSRD impacts them by setting reporting obligations related to their environment, social and governance (ESG) performance (Keinonen et al., 2025). The normative content of the CSRD, however, remains unchanged. Reporting obligations must be assessed from a dual

² The European Commission presented these proposals to the relevant Council working groups. Following the usual legislative process, the Council then negotiated with Parliament to adopt these legislative acts. Among the proposals, all four thematic pillars were adopted, namely pricing (charging the real price of carbon to encourage change); targets (setting quantified targets for sectors not covered by the carbon market) (in particular the RED III and EED directives); rules (imposing technical performance standards); and support (to ensure a socially just transition)

³ To be considered sustainable, an activity must contribute substantially to at least one of the following six objectives: « (a) climate change mitigation; (b) climate change adaptation; (c) the sustainable use and protection of water and marine resources; (d) the transition to a circular economy; (e) pollution prevention and control; (f) the protection and restoration of biodiversity and ecosystems. » ([European Parliament & Council of the European Union, 2020, Art 9](#)). Additionally, Article 17 introduces the principle of Do No Significant Harm (DNSH), which implies that in order to be considered sustainable, an activity must not cause significant harm to any of the SDGs ([European Parliament & Council of the European Union, 2020, Art 17](#)).

materiality perspective, requiring companies to disclose both the impacts of their activities on the environment and society, and the risks and effects that sustainability issues pose to the company itself. In this context, companies are required to report on their business model, due diligence policies and processes, results, risk management and relevant key performance indicators, as well as the resilience of their business model and strategy to sustainability-related risks. In addition, companies must disclose any plans to ensure that their business model and strategy are compatible with the transition to a sustainable economy ([European Parliament & Council of the European Union, 2022a](#)).

As a Directive, the CSRD requires national transposition, and its implementation varies across the countries analysed in this report. France transposed the directive early, in December 2023, while Belgium finalised its transposition in December 2025 after an initial delay. Austria, the Netherlands and Poland completed or stabilised their national frameworks during 2024-2025, and Romania transposed the CSRD in 2024. Denmark and Sweden also completed transposition within this period, whereas North Macedonia, as a candidate country, is not subject to the CSRD but progressively aligns with EU sustainability reporting standards.

Certain parts of the VOD value chain are also covered by the Energy Efficiency Directive (EED), which sets requirements for the energy consumption of data centres, which are critical infrastructures for storing and delivering VOD content. The EED version adopted in 2021 introduced mandatory transparency obligations for data centres with an installed IT power demand of at least 500 kW, requiring the annual publication of information on their energy performance. This includes key technical indicators such as energy consumption and power utilisation, the share of renewable energy, water usage, cooling efficiency and waste heat recovery ([European Commission, n.d.d](#)).

Regarding the EED, France and Germany are early adopters. France had already anticipated some EED requirements in 2021 via the REEN law. The Netherlands and Denmark swiftly adopted technical reporting standards for data centres, while Sweden and Austria finalised their transposition in 2024, emphasising energy efficiency and heat recovery. Meanwhile, Belgium, Poland, and Romania aligned their frameworks later, around the end of 2025, after reminders from the European Commission. Outside the EU, North Macedonia has voluntarily aligned through the Energy Community.

4.2. Sustainability in audiovisual frameworks

Within the EU, the main regulatory framework directly targeting the audiovisual sector is the Audiovisual Media Services Directive (AVMSD), last revised in 2018, which requires VOD platforms to invest in national European audiovisual industries (Idiz et al., 2021). The directive primarily pursues cultural, market and consumer-protection objectives, and does not include environmental sustainability as a core regulatory goal. In particular, Article 9 of the AVMSD, which lists prohibited characteristics and behaviours in audiovisual commercial communication,

specifies that advertising which “encourage[s] behaviour grossly prejudicial to the protection of the environment” is prohibited ([European Parliament & Council of the European Union, 2010](#); [European Parliament & Council of the European Union, 2018](#)). This rule is thus applicable to VOD services as media providers in the case they rely on advertising. Beyond this negative obligation, however, the directive does not impose any requirements concerning the environmental performance of audiovisual production, distribution or digital delivery. One interviewee estimates that integrating sustainability provisions into the current implementation of the AVMSD would be structurally difficult, as legislative texts must be legally precise about what sustainability means in the audiovisual context, a challenge that was not anticipated when the directive was last revised in 2018, and that may only be addressed in a future revision (ITW13). However, the 2026 revision process, which focuses primarily on disinformation, the protection of minors, influencer content and alignment with the DSA, does not envisage introducing any sustainability-specific provisions ([European Commission, 2026](#)).

Another key instrument is the Creative Europe programme, particularly its MEDIA sub-programme, which provides funding for audiovisual projects across Europe and constitutes a major normative pillar of the sector. Creative Europe must contribute to the “overall 30% target for the Union's budget spent on supporting climate objectives” ([European Commission, 2023, p.13](#)), and various initiatives, including Open Method Coordination (OMC) working groups of MS’ experts, pilot projects to promote sustainable mobility for artists, and structured dialogues, have been launched to support the climate transition. However, sustainability is not included as a key priority; rather, that role is increasingly played by market considerations and competitiveness ([Sarikakis et al, 2026](#)). In the MEDIA sub-programme, participants can be awarded five points in most calls for the quality of their section describing their sustainable practices ([European Commission, 2023](#)). However, at this stage, there are no common programme-wide criteria, and the initiatives rely mainly on voluntary commitment. A similar dynamic applies to Eurimages, the Council of Europe's co-production fund, where sustainability plans currently increase a project's chances of receiving funding without constituting a mandatory requirement ([Eurimages, 2025](#)).

The Media and Audiovisual Action Plan (MAAP), is another initiative seeking to harmonise audiovisual practices at the European level (Media Audiovisual Action Plan, 2020). The MAAP is a plan adopted by the Commission in December 2020 to accompany the recovery and transformation of the audiovisual and media sector in the pandemic context. It is organised around three strands: supporting the sector's recovery, promoting environmentally sustainable practices in the digital age, and enabling and empowering citizens and companies (Cabrera Blázquez, 2021). As for environmental practices, the MAAP states that the initiatives should take place in the framework of the Green Deal, seeking for carbon neutrality in 2050. Its action 6, “towards a climate-neutral audiovisual sector”, states that the Commission will open a dialogue with all the audiovisual stakeholders to share best practices and set common tools and standards ([European Commission, 2020a](#)). For example, this plan has led to the development of a carbon calculator to support more sustainable practices (Munch, 2025). While the Plan

received mixed reactions from part of the representative associations on the sector, they were not directed at the environmental topic, but at issues such as competitiveness, intellectual property (IP), and financial support ([AbbateSCIANNI, 2021](#)). It was nevertheless welcomed by ACT, the Association of Commercial Television in Europe, whose members are in favour of a cross-sectorial exchange of good environmental practices, while highlighting the necessity of them being voluntary, as the sector was heavily impacted by the pandemic crisis ([ACT, 2021](#)). Overall, the MAAP does not introduce binding obligations, but relies on coordination, dialogue and voluntary uptake by industry actors. While these measures provide a general regulatory framework within which VOD platforms operate, their influence on the sector remains largely indirect or partial.

The structure of these initiatives highlights the EU's limited authority in the culture and climate policy fields. According to the Treaties, cultural policy is a supporting competence of the Union, as detailed in Article 6 and Article 167 of the Treaty on the Functioning of the European Union (TFEU). These provisions prevent the harmonisation of national laws in these sectors. Consequently, EU involvement in the audiovisual industry mainly depends on incentive programmes, coordination mechanisms and financial support, rather than binding legislative obligations. In this context, initiatives based on voluntary collaboration, with the objective of developing shared solutions, are emerging among various European stakeholders, both from the top down through EU funding programmes and from the bottom up through industry-led alliances and cross-border professional networks.

Two initiatives have sought to advance greener production practices in the audiovisual sector: Green Screen and its successor project, EURECA. Green Screen was an Interreg project conducted between 2017 and 2021, uniting 8 development and film agencies in the EU: Film London (UK), Municipality of Ystad (Sweden), Flanders Audiovisual Fund (Belgium), Film Paris Region (France), Bucharest Ilfov Regional Development Agency (Romania), Promálaga (Spain), Rzeszow Regional Development Agency (Poland), Slovak Film Commission (Slovakia). It aimed at developing best practices for sustainable audiovisual production in Europe. Building on 4 years of collaboration within the Green Screen Project three partners of Green Screen (the Flanders Audiovisual Fund, Promalaga, and the Slovak Audiovisual Fund) developed the project EURECA, co-funded by the European Regional Development Fund. EURECA is a carbon calculator designed to evaluate the environmental impact of any audiovisual production in Europe, tailored to industry realities through the active input of audiovisual professionals, and usable by funding bodies as an instrument for eco-conditionality ([Interreg Europe, 2022](#)). While these initiatives represent significant steps towards a more sustainable industry, they remain voluntary and are limited in scope to the production phase, leaving distribution and consumption largely outside their remit.

European audiovisual policies show that financial incentives constitute the primary lever of the sector's climate transition. In the absence of direct and binding regulation targeting audiovisual works or VOD services, the EU and the MS increasingly rely on eco-conditionality attached to

State aid schemes. As highlighted by Munch (2025), access to Creative Europe MEDIA funding and to national tax incentive schemes has, since 2021, been intrinsically linked to the adoption of green production practices. This approach transforms public financial support into a climate governance tool, whereby the economic viability of audiovisual projects increasingly depends on their compliance with sustainability standards, rather than on regulatory obligations imposed on content as such.

4.3. Sustainability policies governing digital infrastructures

In recent years, an increasing share of legislation has focused on regulating digital infrastructure-related aspects. The VOD sector is highly dependent on the broader digital infrastructure to which it also contributes, most notably the internet ecosystem.

Although VOD services are often perceived as intangible or virtual, they rely on a material and energy-intensive infrastructure, including data centres, network equipment, and cabling systems. These physical components generate measurable environmental impacts and must therefore be fully integrated into assessments and policy strategies aimed at achieving a SCT.

At the European level, the EED constitutes the most direct regulatory instrument addressing the energy performance of digital infrastructures, notably data centres. As outlined above (section 3.1), the revised EED introduces monitoring and reporting obligations for large data centres and reflects the “energy efficiency first” principle. This framework is complemented by the EU Code of Conduct for Data Centres, a voluntary instrument designed to promote best practices in energy efficiency, cooling systems and power management across the sector (Kemna et al., 2020; Dentons, 2025). While non-binding, the Code of Conduct plays a coordinating role and serves as a reference for both industry actors and policymakers.

The Digital Services Act (DSA) is the EU’s horizontal regulatory framework for online intermediary services and platforms, introducing obligations concerning transparency, platform design, recommender systems, systemic risks and data access ([European Parliament & Council of the European Union, 2022b](#); [Le Roy, 2024](#)). It does not establish environmental obligations for VOD services, but some of its procedural mechanisms could support future research and governance concerning the environmental effects of platform design and consumption patterns. For platforms falling within its scope, the DSA introduces transparency requirements for recommender systems and, for very large online platforms, systemic-risk assessments and data-access mechanisms for vetted researchers ([European Parliament & Council of the European Union, 2022b](#); [European Commission, 2025c](#); [Le Roy, 2024](#)). These provisions could facilitate research into how recommendation systems, autoplay and other design features affect viewing intensity and associated digital resource consumption. The DSA therefore does not constitute an environmental regulatory instrument, but it may provide useful procedural tools for investigating such impacts.

Also, while not targeting VOD specifically, several regulations that target the material components of network infrastructure are worth mentioning: the Waste Electrical and Electronic Equipment (WEEE) Directive⁴, the Regulations on Hazardous Substances (RoHS) Directive⁵ (Kääpä, 2018), the Ecodesign for Sustainable Products Regulation (ESPR), the Energy Labelling Regulation (ELR)⁶. Finally, end users are playing an increasingly important role in European sustainability policies. In this context, the EU adopted in 2024 the Empowering Consumers for the Green Transition Directive⁷ and the Right to Repair, included in a directive also adopted in 2024⁸.

These instruments highlight two parallel regulatory logics: sustainability in the audiovisual sector is addressed through voluntary schemes, eco-conditionality and public funding incentives, while digital infrastructure policy relies on technical standards and reporting obligations. Yet despite this multi-layered normative architecture, VOD sustainability is not addressed as an autonomous, integrated system. The environmental impact of streaming is governed only indirectly, through the infrastructures and devices that enable access and distribution, rather than through direct regulation of content or platforms leaving the core environmental impacts of streaming largely unregulated.

Table 2: Summary of relevant EU regulation

Name	Date	Source
European Green Deal	2019	https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en
European Climate Law	2021	https://climate.ec.europa.eu/areas-action/european-climate-law_en
Fit for 55	2021	https://www.consilium.europa.eu/en/policies/fit-for-55/

⁴ The [WEEE Directive](#) aims to reduce the environmental and health impacts associated with the production and management of electronic waste requiring producers to finance the collection, treatment and environmentally sound disposal of waste from their products.

⁵ The [RoHS Directive](#) (Restriction of Hazardous Substances) establishes rules aimed at protecting human health and the environment by limiting the presence of hazardous substances in electrical and electronic equipment placed on the market in the European Union.

⁶ These two directives exert an indirect influence on the VOD sector. By setting requirements related to energy performance, product durability, reparability, recyclability, and the limitation of hazardous substances, these regulations shape the environmental characteristics of the physical electronic devices, such as televisions, computers, and display equipment, through which VOD services are accessed and consumed (Keinonen et al., 2025).

⁷ [This directive](#) aims to improve consumer information and tackle misleading practices related to environmental claims. In particular, it aims to ban generic or non-verifiable environmental claims, improve transparency on the sustainability and reparability of products, and enable consumers to make more informed purchasing decisions.

⁸ It provides a legislative framework focused on facilitating the repair of goods, particularly electrical and electronic equipment. This initiative aims to make repair more accessible, attractive and economically viable for consumers, in particular by strengthening manufacturers' repair obligations and promoting alternatives to product replacement ([European Parliament, 2024](#)).

Next Generation EU	2020	https://eur-lex.europa.eu/eli/reg/2020/2094/oj/eng
Green Taxonomy	2020	https://eur-lex.europa.eu/eli/reg/2020/852/oj
Corporate Sustainability Reporting Directive (CSRD)	2022	https://eur-lex.europa.eu/eli/dir/2022/2464/oj
Energy Efficiency Directive (EED)	2023	https://eur-lex.europa.eu/eli/dir/2023/1791/oj
EU Code of Conduct for Data Centres	2008	https://www.google.com/search?q=https://eetd.jrc.ec.europa.eu/
Audiovisual Media Services Directive (AVMSD)	2018	https://eur-lex.europa.eu/eli/dir/2018/1808/oj
Creative Europe – MEDIA	2021	https://eur-lex.europa.eu/eli/reg/2021/818/oj
Eurimages	1989	https://www.coe.int/en/web/eurimages
Media and Audiovisual Action Plan (MAAP)	2020	https://www.google.com/search?q=https://eur-lex.europa.eu/legal-content/FR/TXT/%3Furi%3DCELEX:52020DC0784
Green Screen	2017	https://www.interregeurope.eu/greenscreen
EURECA	2022	https://www.eurecafilm.eu/eureca
Digital Services Act (DSA)	2022	https://eur-lex.europa.eu/eli/reg/2022/2065/oj
Waste Electrical and Electronic Equipment (WEEE) Directive	2012	https://eur-lex.europa.eu/eli/dir/2012/19/oj
Regulations on Hazardous Substances (RoHS) Directive	2011	https://eur-lex.europa.eu/eli/dir/2011/65/oj
Ecodesign for Sustainable Products Regulation (ESPR)	2024	https://eur-lex.europa.eu/eli/reg/2024/1781/oj
Energy Labelling Regulation (ELR)	2017	https://eur-lex.europa.eu/eli/reg/2017/1369/oj
Empowering Consumers for the Green Transition Directive	2024	https://eur-lex.europa.eu/eli/dir/2024/825/oj
Right to Repair Directive	2024	https://eur-lex.europa.eu/eli/dir/2024/1799/oj

5. Policy frameworks in ten case studies

Following the overview of the European policy landscape, this section turns to the nine case studies to examine how SCT objectives are integrated into the governance of the audiovisual and VOD sectors.

This section is organised into two complementary parts. The first one provides a comparative overview of the audiovisual and VOD markets in the selected countries, offering the contextual elements necessary to understand the differences observed in national policy approaches. The second presents the comparative policy mapping. Rather than providing a comprehensive description of national audiovisual policy frameworks, which have already been analysed in previous published deliverables or works⁹, the analysis focuses specifically on the intersection between audiovisual, VOD and sustainability policies.

Each case study follows the same analytical structure in six points. It first identifies the main institutional actors. After that, it proposes an overview of the political context surrounding the SCT. It then maps the main policy measures, legislative frameworks, initiatives and good practices supporting sustainability, together with stakeholders' perceptions of their effectiveness (see a typology in [Annexe 3](#)). The fourth subsection examines patterns of collaboration between the identified actors across different governance levels. Afterwards, each case study discusses policy gaps and implementation challenges. Finally, emerging trends and stakeholders' recommendations for strengthening the sustainable transition of the audiovisual and VOD sectors are highlighted.

5.1. Market overview¹⁰

This section aims to provide a quantitative overview of the audiovisual and streaming markets in the nine case studies. The data used for this analysis comes from the European Audiovisual Observatory, as of June 2026: Figures 1 to 4 are from the [FOCUS report](#); Figures 5 to 9 are from the [VOD Dashboard](#); and Figures 10 and 11 are from data available on [MAVISE](#).

Between 2015 and 2025, feature film production, cinema admissions, and gross box office revenue across the sample reveal both a stable hierarchy and contrasting national dynamics. As shown in Figure 1, France maintains a clear dominant position in production, producing two to four times more films than its peers ([European Audiovisual Observatory, 2016-2026](#)). Most countries experienced a marked decline in 2020, likely linked to the pandemic. Denmark stands out as the only country largely unaffected in production, though, as shown in Figures 2 and 3, its

⁹ See for example Vlassis, A., et al. (2025). Final report on the mapping and EU law of institutional models for the promotion of the EFI. The Reboot Project; Kostovska, I., Hammoud, P. (2026). Policy Toolkit for Screen Agencies, CresCine. Møller, R. M., Frøhmorgen, T., & Søndergaard, D. B. (2025). Toolbox for Green Innovation—A Practical Guide for Film Professionals. CresCine.; Murschetz, P. C., Teichmann, R., & Karmasin, M. (Éds.). (2018). Handbook of State Aid for Film. Springer International Publishing.

¹⁰ Data for North Macedonia are unavailable for certain years, explaining the gaps appearing in the corresponding lines of the graphs.

admissions and box office still dropped that year ([European Audiovisual Observatory, 2016-2026](#)).

As shown in Figure 2, admissions collapsed sharply in 2020, with France losing over two-thirds of its audience (from 213 to 65 million), while Figure 3 shows a comparable collapse in gross box office, with France down nearly 70% that year (from 1,620 to 494 million USD). Recovery has been gradual but incomplete across both indicators: by 2025, admissions and box office remain below 2019 levels for most countries, whereas production volumes (Figure 1) have broadly recovered, and in some cases exceeded, their pre-pandemic figures. Among mid-tier countries, Poland displays the most volatile trajectory in Figure 1, overtaking the Netherlands in production by 2025 despite reaching its lowest point in 2020, while Figures 2 and 3 show the Netherlands remaining ahead of Poland in both admissions and box office throughout the period. North Macedonia remains a marginal case across all three indicators, producing 12 to 30 times fewer films than France (Figure 1), with admissions below one million (Figure 2) and box office revenue under 2 million USD throughout (Figure 3).

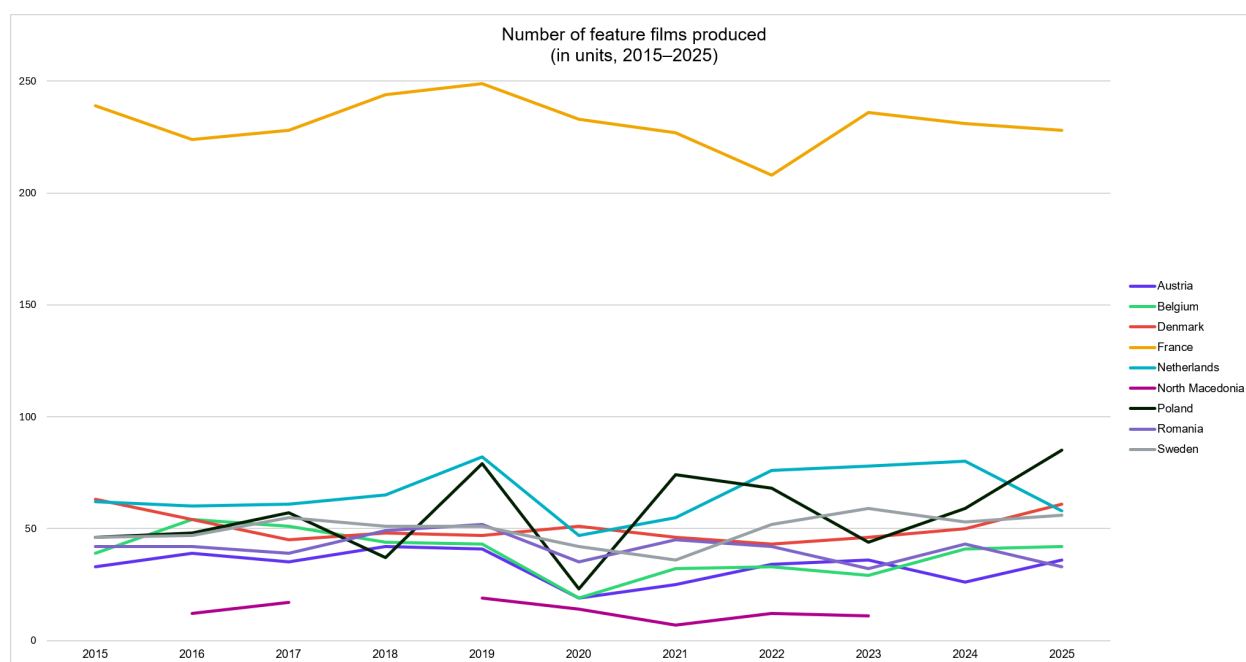


Figure 1 - Number of feature films produced

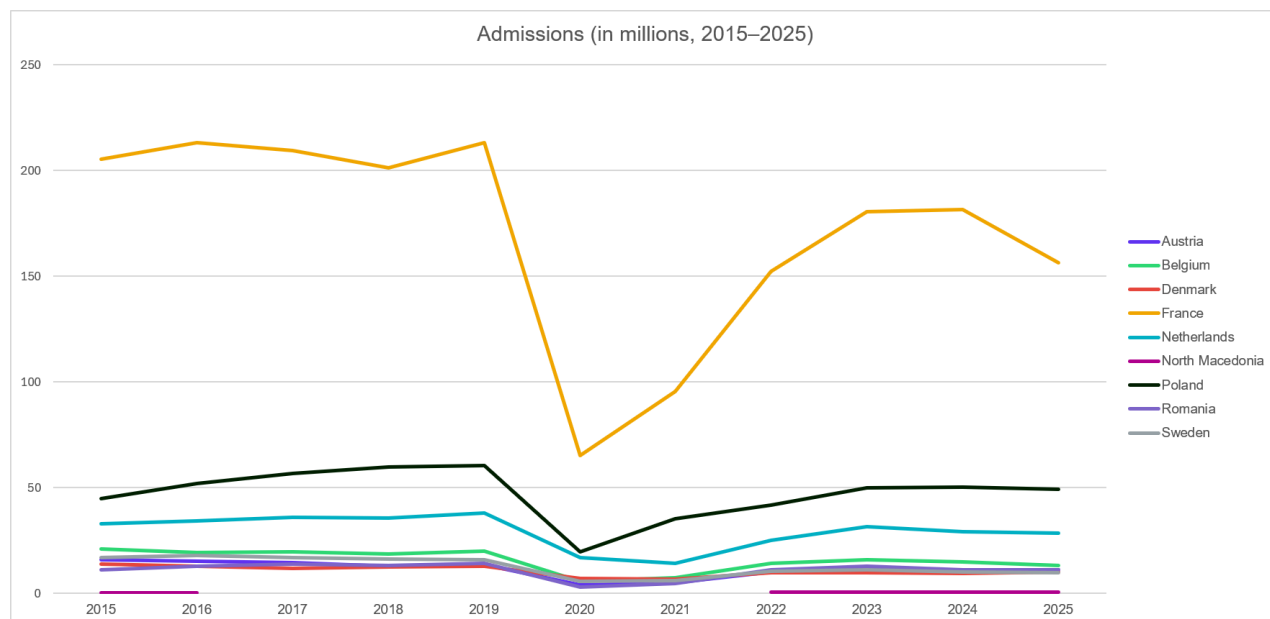


Figure 2 - Admissions

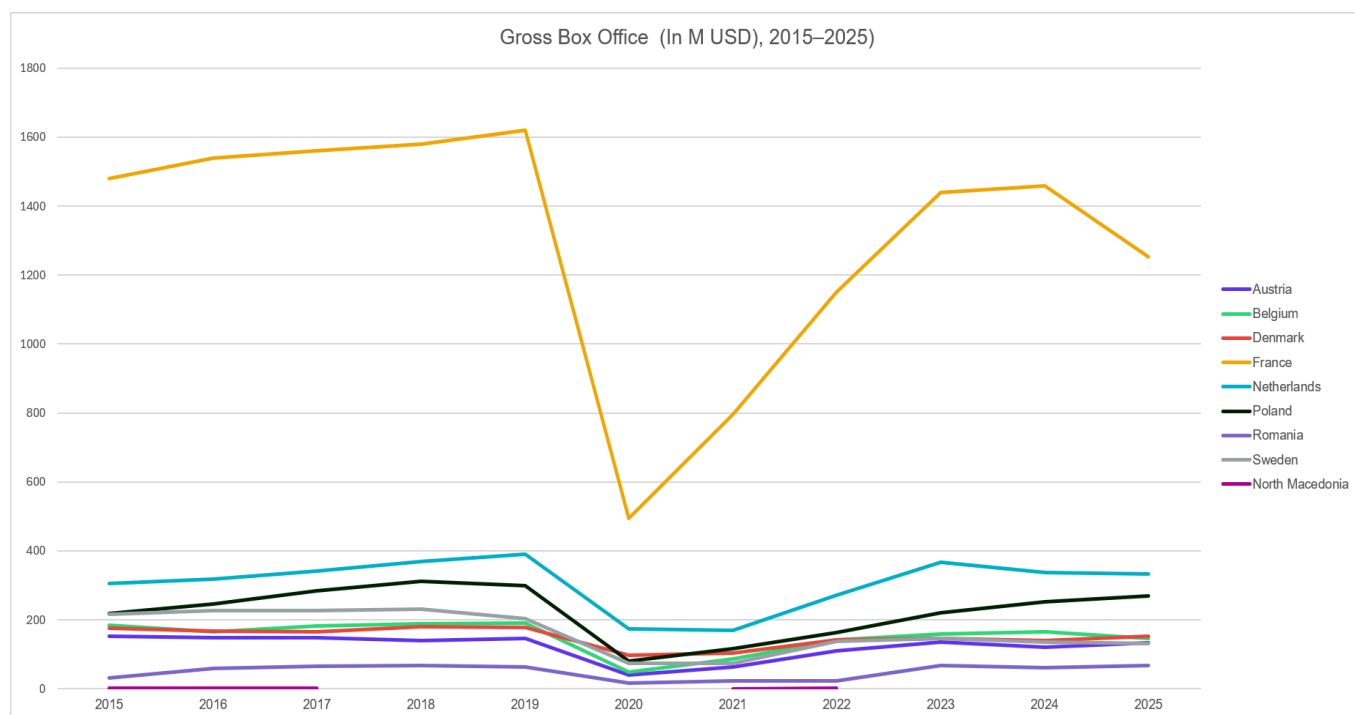


Figure 3 - Gross Box Office

National market share, shown in Figure 4, offers a different perspective: both Denmark and France saw a sharp spike in 2020, with Denmark's domestic films capturing over 50% of the national market and France's over 45%, consistent with fewer international releases reaching cinemas that year and leaving more room for local productions ([European Audiovisual Observatory, 2016-2026](#)). Denmark's share then declined steadily through 2024 before rebounding to 37% in 2025, converging with France at a similar level. Poland, meanwhile, retains the highest market share among mid-tier countries throughout the period, despite a notable upward trend from Romania, whose share rose from under 2% in 2015 to nearly 23% by 2025.

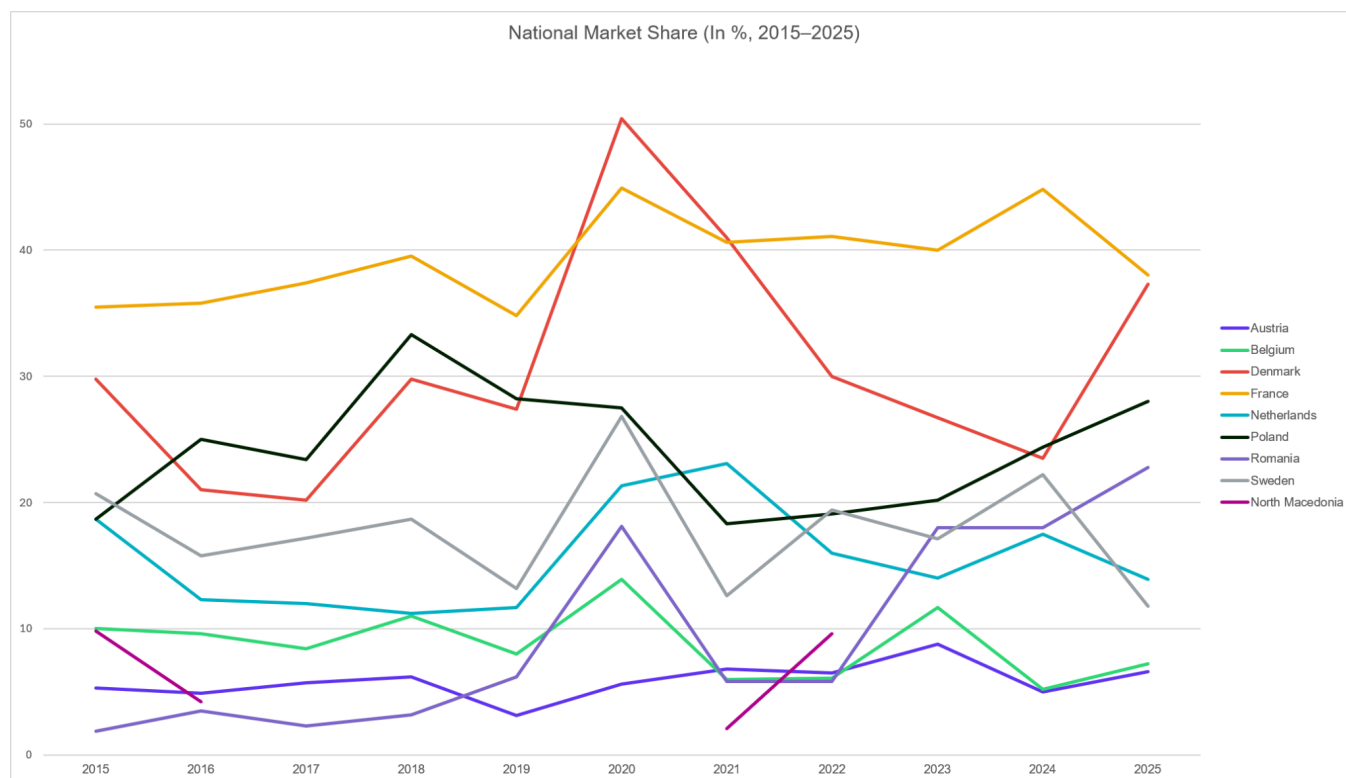


Figure 4 - National Market Share

Turning to the SVOD segment of the market, Figure 5 displays a sustained and near-exponential growth in European SVOD subscriptions between 2014 and 2023 (from 12.6 to 222.9 mln), accelerating sharply from 2019 and showing no disruption in 2020 ([European Audiovisual Observatory, n.d.a](#)). Figure 6 shows that this growing market is highly concentrated: Netflix and Amazon Prime Video together account for half of all subscriptions among the top 37 European AV groups, while the top four players (adding Disney and Warner Bros. Discovery) control 70% of the market ([European Audiovisual Observatory, n.d.a](#)). Figure 7 shows that this concentration is even more noticeable by revenue, with Netflix's share accounting for 39% and the top four players accounting for 73% ([European Audiovisual Observatory, n.d.a](#)).

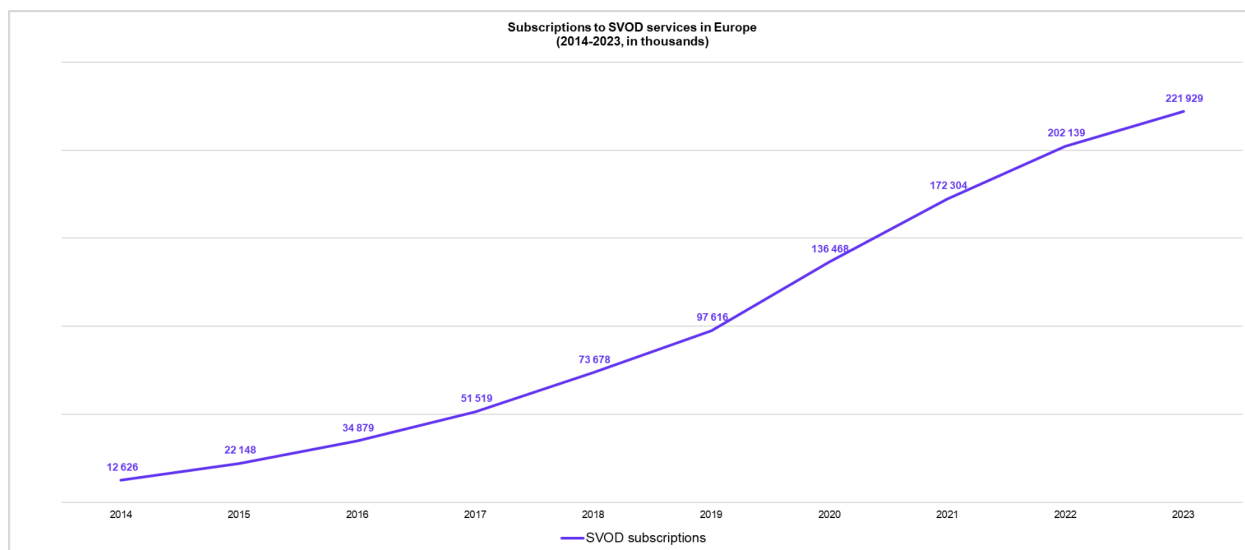


Figure 5 - Subscriptions to Subscription Video-on-demand (SVOD) services in Europe

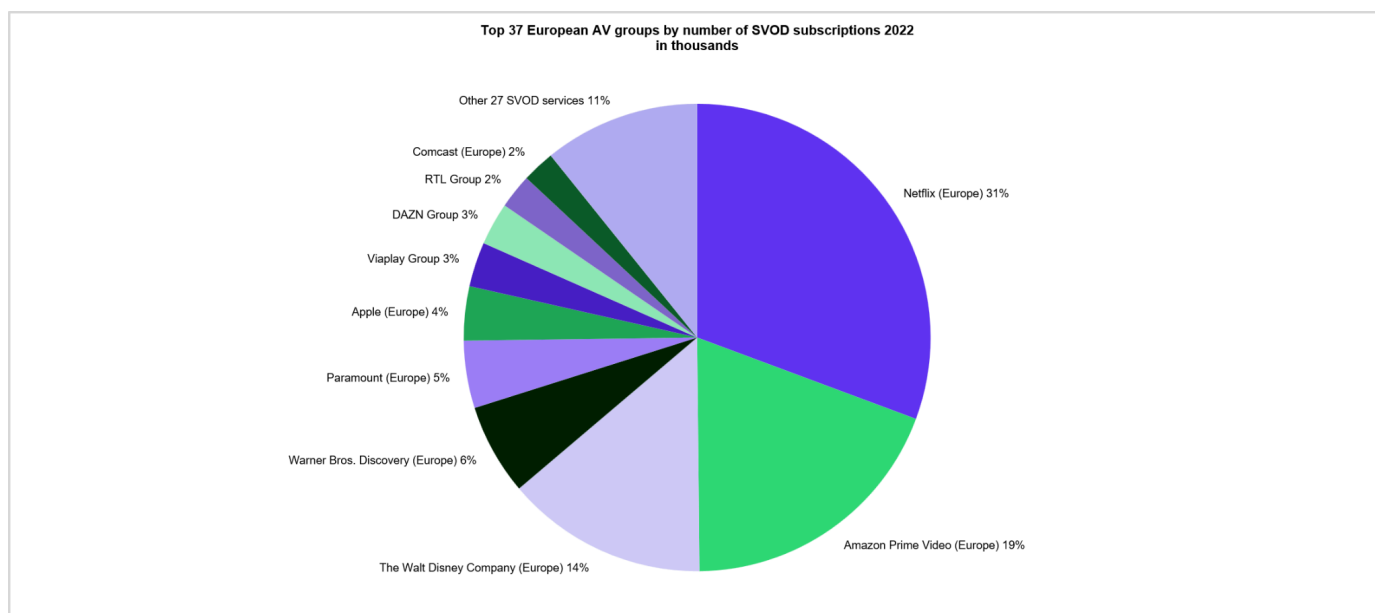


Figure 6 - Top 37 European AV groups by number of SVOD subscriptions

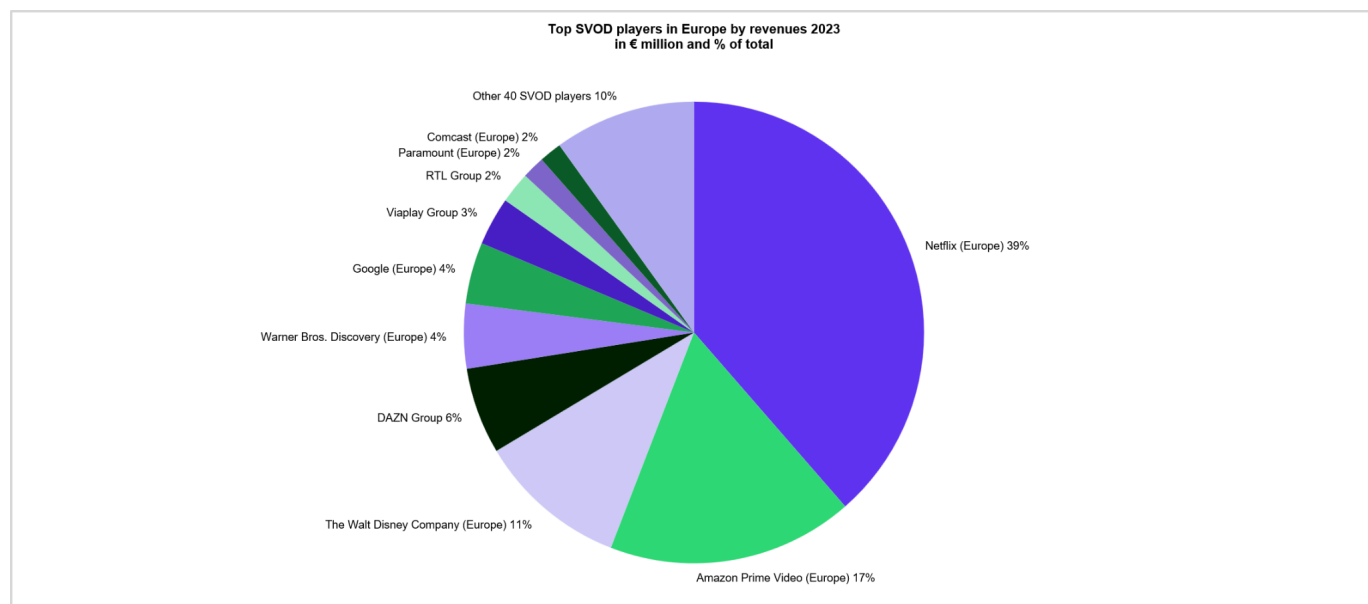


Figure 7 - Top SVOD players in Europe by revenues

Ownership data offers a complementary perspective on this picture of concentration. Figure 8 shows that, by number of services among the top 50 groups, European-owned companies account for a clear majority (73%) compared to US-owned groups (24%) ([European Audiovisual Observatory, n.d.a](#)). This suggests that, while a few US platforms capture most subscribers and revenue, a much larger number of smaller European-owned companies operate across the remaining market share. Figure 9 further shows that this top 50 landscape is overwhelmingly private in terms of service count, with privately owned groups accounting for 97% of services and publicly owned services representing only a marginal share (3%) ([European Audiovisual Observatory, n.d.a](#)).

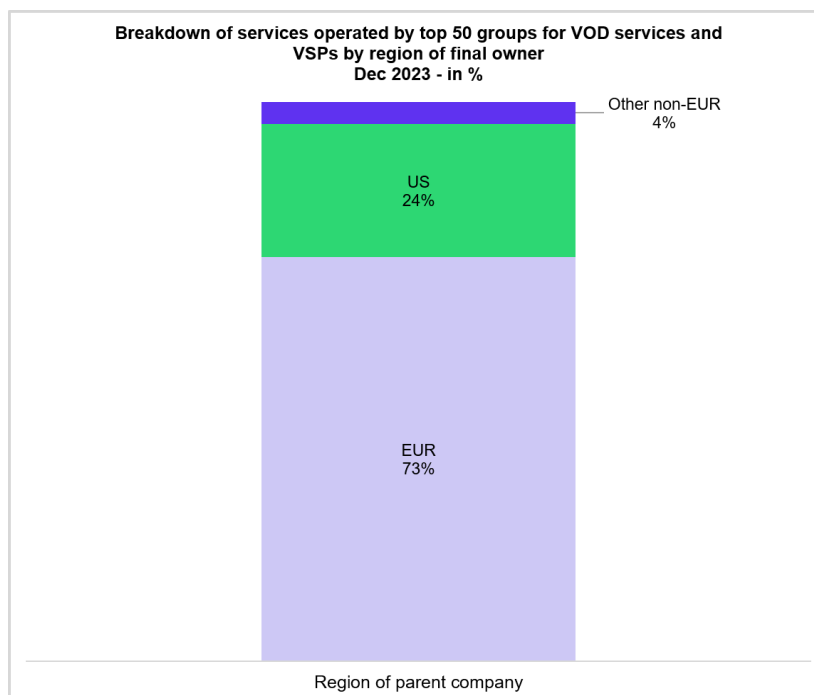


Figure 8 - Breakdown of services operated by top 50 groups for VOD services and Video-sharing platforms (VSPs) by region of final owner

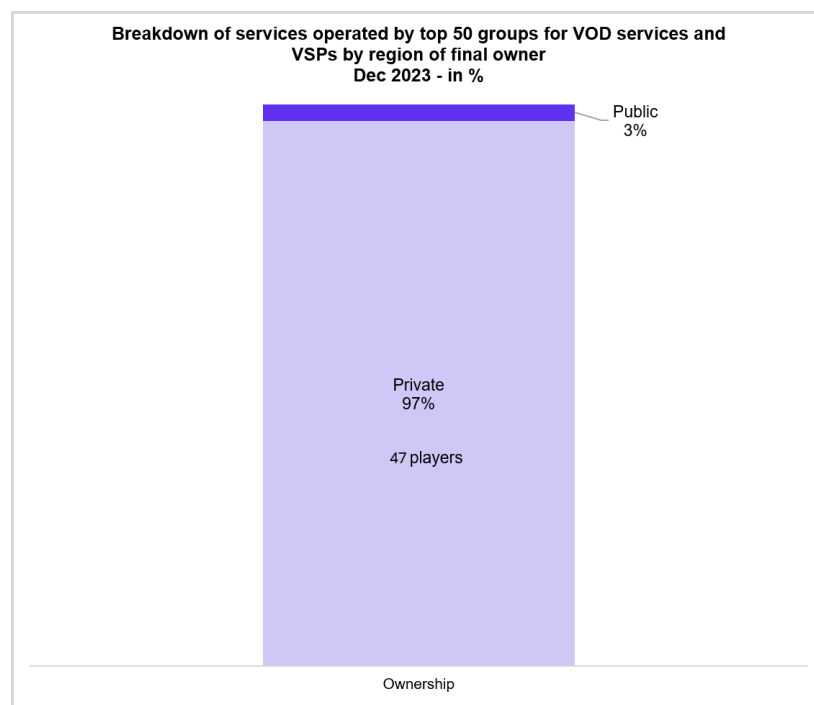


Figure 9 - Breakdown of services operated by top 50 groups for VOD services and VSPs by region of final owner

Shifting to MAVISE data on VOD service establishment and availability, France and Poland dominate both dimensions throughout the sample: as shown in Figure 10, they lead by a wide margin in established services (345 and 302, respectively, against 159 for Austria), a lead confirmed by Figure 11 in terms of availability (348 and 318, respectively) ([European Audiovisual Observatory, n.d.b](#)). Locally registered services account for the vast majority of the total in nearly all countries, whereas Figure 11 shows the opposite pattern for availability, with the category “National” accounting for the vast majority of services consumers can access. Smaller markets such as Denmark, Belgium and North Macedonia show a markedly higher number of available services than established ones, driven largely by services registered in other countries but accessible under the “Several Countries” category, suggesting a strong reliance on VOD services established in foreign countries. By contrast, France and Poland show nearly the same totals between established and available VOD services, indicating a self-sufficient domestic VOD market.

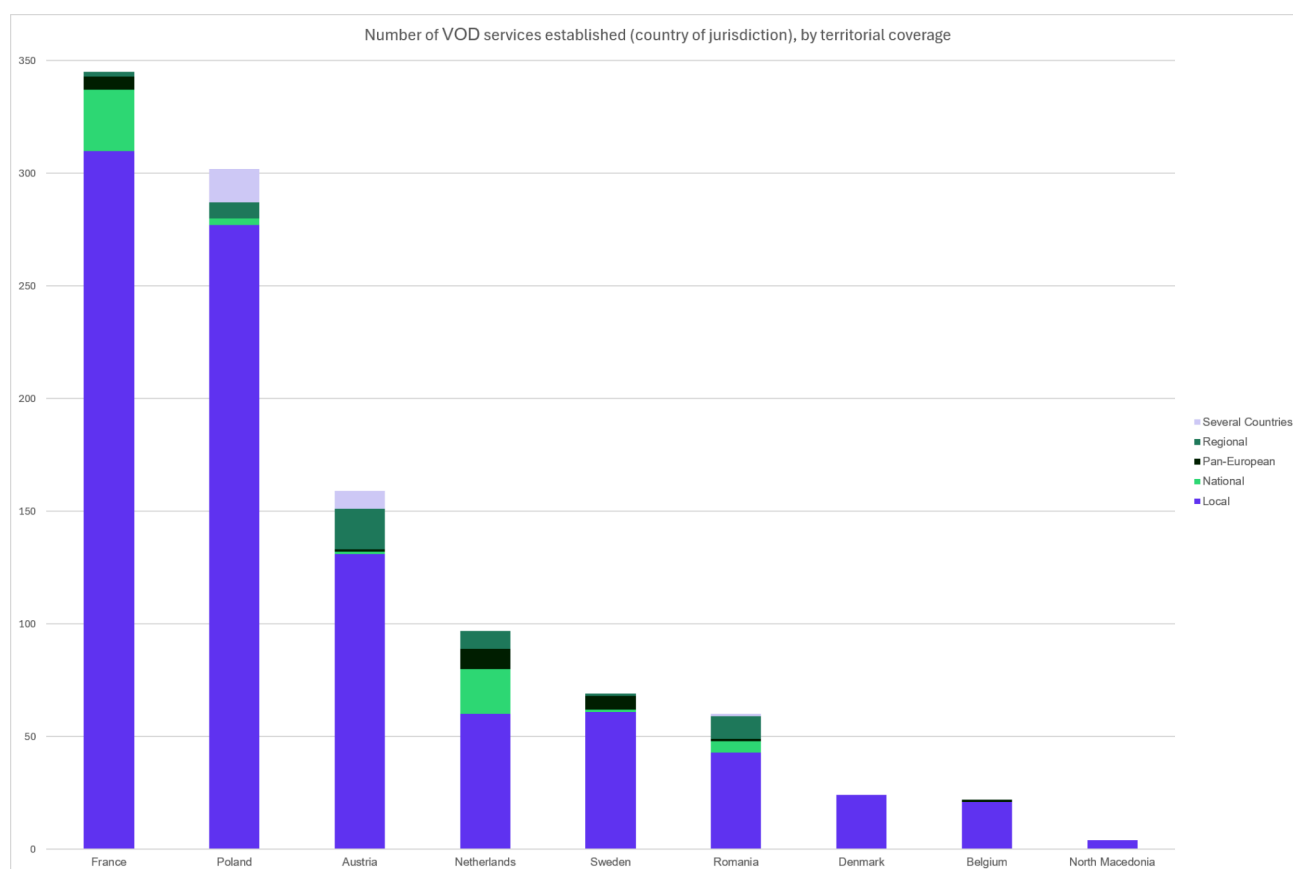


Figure 10 - Number of VOD services established, by territorial coverage

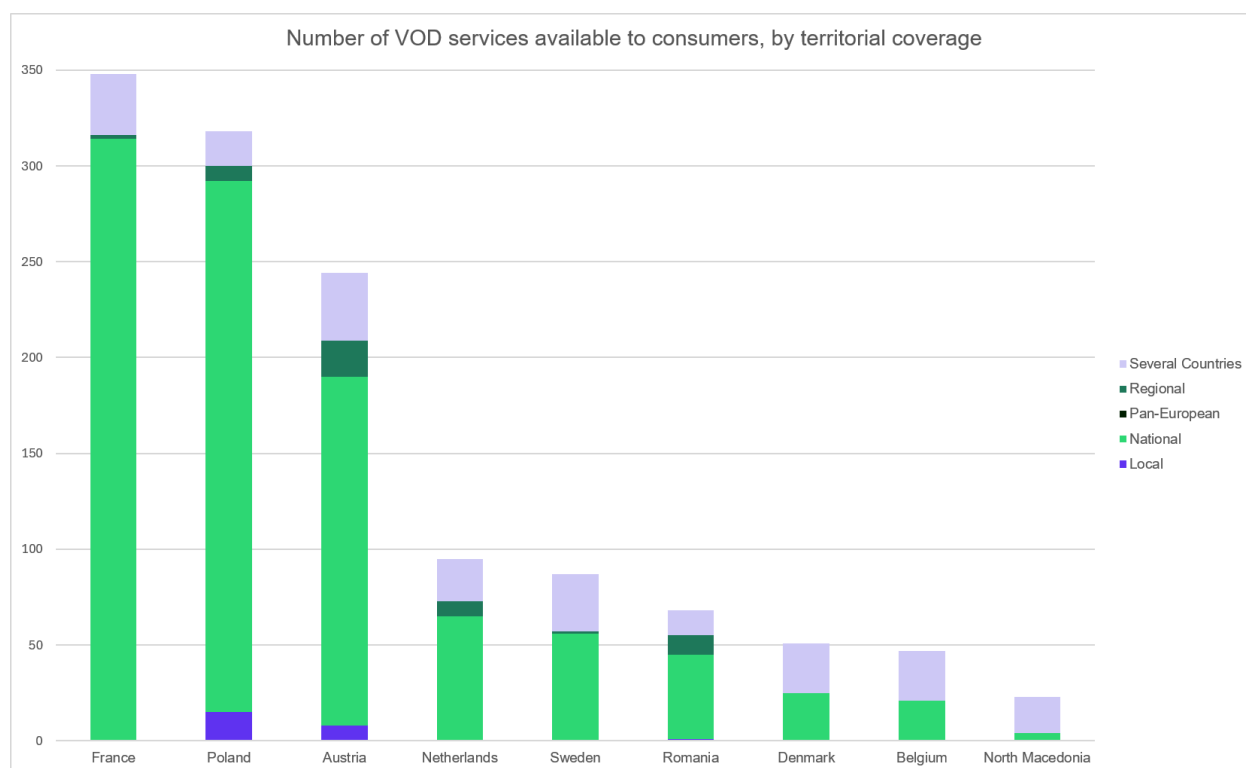


Figure 11 - Number of VOD services available to consumers, by territorial coverage

5.2. Austria

Institutional landscape

Austria is a federal state composed of nine Länder (federal states or provinces). The distribution of powers relating to the audiovisual sector is between federal institutions and regional institutions (Länder), and operates as a transversal strategy rather than a strictly sectoral model. It expands beyond traditional audiovisual boundaries to establish a synergy between government environmental policy and targeted administrative, commercial, and fiscal incentives, encompassing different institutions and levels of power.

At the federal level, two main instruments structure Austrian film funding. The first is the Austrian Film Institute (ÖFI), established by the original Federal Act of 25 November 1980 on the Promotion of Austrian Film. ÖFI serves as the primary film funding institution in Austria, collaborating primarily with film producers and engaging in ongoing dialogue with the industry, while maintaining a robust network at both the national and international levels (ITW17; [ÖFI, n.d.d](#)). The second is Film Industry Support Austria (FISA), a funding scheme created under the Film Location Act and driven by the Ministry of Economy, which offers a location-based

incentive targeting cinema, television, and streaming productions ([Teichmann & Murschetz, 2018](#)).

In parallel to this federal funding architecture, the Ministry of Environment manages a long-term strategy by the implementation of an Ecolabel across several sectors ([BMLUK, n.d.](#)). In 2017, after a multisided dialogue with the sector, an Ecolabel certifying audiovisual production was formally implemented (ITW11; [Österreichisches Umweltzeichen, 2025](#)).

In 2023, this state-level action was complemented by a legislative package aimed at strengthening environmental sustainability in the film industry. This package directly targeted the two instruments described above (ÖFI and FISA+), applying environmental criteria to each in a coordinated shift: on the one hand, an amendment to the 1980 Film Promotion Act explicitly revised ÖFI's core objectives and financial instruments to integrate environmental criteria; on the other hand, the 2023 Film Location Act reformed FISA into FISA+ to incorporate sustainability promotion as a core pillar of its funding schemes. The objective of this legislative reform is to align film production practices with the SDGs established by Austria under its international commitments ([UNESCO, n.d.](#)).

Finally, this synergy is reinforced at the decentralised level by regional film commissions, which play a significant role in developing knowledge and competencies. In Austria, 14 institutions¹¹ originating from the 9 Länder have the competency to fund cinema, in application of the Culture Promotion Act ([Teichmann & Murschetz, 2018](#)). Notable examples include the Lower Austria Film Commission (LAFC), which established the "Evergreen Prisma" competence centre, now a European benchmark for green filming practices, as well as Green Filming Tirol, which is also actively engaged in these sectoral discussions.

Beyond funding institutions, the regulation of broadcasting and VOD services in Austria falls under the authority of KommAustria, an independent regulatory body established under the KommAustria-Gesetz (KOG) and supported administratively by RTR-GmbH ([RTR, n.d.a](#)). KommAustria's competences over on-demand audiovisual media services derive from the Audiovisual Media Services Act (Audiovisuelle MediendiensteGesetz, AMD-G), Austria's transposition of the EU's Audiovisual Media Services Directive ([RTR, n.d.b](#)). To date, however, KommAustria's mandate has not been extended to environmental sustainability, and no VOD-specific climate regulation has been introduced under its authority.

Political context

In Austria, several acts regulate climate change, dating back to the 2007 Climate and Energy Fund Act¹². It is not a single piece of legislation that regulates climate change, but rather a set of

¹¹ Provincial Government of Burgenland, Carinthia Film Commission, Federal Province of Carinthia, Lower Austrian Film Commission, Filmlocation Salzburg, Federal Province of Salzburg, Cine Styria Film Commission and Fund, Cine Art, Cine Tirol Film Commission, Federal Province of Tyrol, Federal Province of Upper Austria, Vienna Film FUnd, Vienna Film Commission, Federal Province of Vorarlberg.

¹² Bundesgesetz über die Errichtung des Klima- und Energiefonds - Klima- und Energiefondsgesetz ([KLI.EN-FondsG](#))

laws regulating various sectors impacted by climate issues ([Bertel, 2023](#)). In accordance with Regulation 2018/1999 of the parliament and the council¹³ Austria adopted the National Energy and Climate Plan (NECP) in 2019, covering the period 2021-2030, as well as a long-term strategy. Given Austria's federal structure, the Länder have also incorporated climate commitments into their constitutions ([Bertel, 2023](#)).

Beyond this framework, interviews with key stakeholders show two different views on how the audiovisual sector fits into Austria's climate strategy. The Ministry of Environment treats climate change as a cross-cutting issue, viewing the audiovisual sector as having a unique advantage due to its direct connection to consumers. According to a public policy expert, the industry still underutilises its power to shape public behaviour and attitudes through its content (ITW11). On the other hand, the ÖFI looks at the sector as an industrial value chain that needs targeted interventions rather than blanket rules. On the topic of content, the institute seems more cautious than the Ministry, arguing that the sector has not yet found an effective way to address climate change through its works and noting that current attempts, which often rely on catastrophism, have had limited impact (ITW17). Taken together, these two perspectives point to a shared diagnosis that audiovisual works remain an underused tool for climate action. However, unlocking this potential requires more than simply telling the sector to engage with the topic; the real challenge is figuring out which storytelling approaches can actually shift public behaviour.

Instruments and their reception

In Austria, promoting sustainability in the audiovisual industry does not depend on isolated initiatives. Instead, it works as a connected system working around three main components: an ecolabel managed by the Federal Ministry for Climate, different financial incentives, and expertise in training by the Länder film commissions.

Firstly, regarding the ecolabel component, UZ76 is one of the more than 60 specific guidelines administered by the Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology (BMLUK) under the Austrian Ecolabel system. Launched in 2017, this certification is tailored for films and audiovisual productions. It functions as part of a comprehensive, government-backed Type 1 environmental label (compliant with EN ISO 14024) that has been in operation since 1990 and spans five diverse categories, including products and services, tourism, education, events, and art and culture ([BMLUK, n.d.](#); ITW17).

The initial version of the UZ76 guideline was adopted in 2017 and covers all forms of audiovisual production, including films, advertising, documentaries, series, and shows. Since 2021, films have been eligible for certification, which encompasses all stages from development to distribution. This certification may extend to international productions, ensuring

¹³ Regulation (EU) [2018/1999](#) of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action.

that the final work meets strict environmental and ethical standards (KEA European Affairs, 2024). The ecolabel is awarded to the film itself, not the production company, which acts merely as the licensee. As the certification is valid for a four-year period and specifically targets the production phase, it focuses especially on operational sustainability (ITW11; ITW17).

The UZ76 standard establishes rigorous sustainability requirements, mandating compliance with all applicable laws, fair labour practices, and environmentally responsible measures throughout the production process. Eligible productions must demonstrate financial structures that support legal and labour compliance while integrating eco-friendly practices such as renewable energy use, sustainable transportation, and waste management. Production companies are further expected to adopt "green office" management, appoint a Green Producing Officer, and actively promote sustainable mobility. Obtaining the label requires the completion of a comprehensive audit (Kääpä & Vaughan, 2025). The criteria are defined by the Ministry in collaboration with relevant stakeholders, including other government bodies (such as the Ministry of Economy), environmental specialists, and industry experts ([Österreichisches Umweltzeichen, n.d.b](#)). The approach is intentionally pragmatic, prioritising concrete criteria with a direct, measurable impact on production sustainability ([Österreichisches Umweltzeichen, n.d.b](#)), unlike carbon-calculating tools, which the Ministry considers insufficient. As noted, "Just by calculating carbon dioxide, you don't achieve anything, nothing at all." (ITW11).

The UZ76 ecolabel has been generally well-received. At the local level, it is widely recognised, and the European Commission has formally acknowledged it as a "good practice" (European Commission, 2023). Furthermore, the criteria set forth by the label serve as a foundation for several other Austrian initiatives, including those of the ÖFI and the FISA+ funding scheme (ITW11). Despite these successes, the voluntary nature of the label introduces a selection bias, as typically only organisations already committed to sustainability seek certification (ITW11). Currently, only 11% of all funded cinema productions apply for the UZ76 label (ITW11). As of July 2026, UZ76 was awarded to 50 licensees (covering private and public film, TV and advertising production companies) across 14 Austrian cities, with 6 of them being the public broadcaster ORF ([Österreichisches Umweltzeichen, n.d.a](#)). While project-related costs up to the completion of the film are covered by the arts and culture budget, production companies must bear the burden of recertification or usage fees. These costs, which include consultancy and licensing fees, are frequently cited as a deterrent for applicants. Consequently, the ÖFI has developed an in-house, verifiable auditing system as an alternative. Finally, the Ministry acknowledges ongoing challenges regarding the certification of co-productions and documentaries, where the collection of necessary data remains complex (ITW11).

Secondly, financial incentives play a pivotal role in driving this transition, led by the ÖFI and the Ministry of Business. The integration of green filming practices began as early as 2019, when the ÖFI started introducing sustainability requirements through a step-by-step process connected with other regional and national funds (ITW17; [ÖFI, n.d.b](#)). In 2023, an amendment of the 1980 Film Funding Act formally added the environmental sustainability of the film industry

to the ÖFI's statutory objectives. Section 2 of the Act mandates the institute to "create incentives for ecologically sustainable film production"¹⁴. That same year, the ÖFI officially established a dedicated Green Film Department ([ÖFI, n.d.a](#)). Today, the ÖFI's support framework operates through two distinct funding channels: its traditional funding schemes, anterior to the 2023 reform, and the newly established ÖFI+ mechanism, introduced in 2023. Both systems have a mandatory set of sustainability requirements, establishing a unified standard across all cinema funding modes. Furthermore, an additional, voluntary 5% "green bonus" is available under ÖFI+. This incentive is designed to reward production companies that commit to higher sustainability standards ([ÖFI, 2023](#)).

Regarding traditional funding channels, the ÖFI's support is provided through two main modalities: "reference" production funding, an automatic aid based on the producer's track record, and project development funding, a selective aid decided by a commission. Since 2023, both funding options require productions to respect three main rules. First, they must follow a specific catalogue of ecological minimum standards and meet at least 20 criteria out of 26. Second, they must create an environmental sustainability plan. Third, they must hire a certified green consultant ([ÖFI, n.d.c](#)). This catalogue of criteria was created by the ÖFI in collaboration with Evergreen Prisma and the Association of Green Consultants Austria (VGFA) (Kääpä & Vaughan, 2025). It was designed to set clear priorities for Austria while making international co-productions easier, especially with Germany (Munch, 2025).

Furthermore, the 2023 amendment introduced a new automatic funding system called ÖFI+ (Kääpä & Vaughan, 2025). This system offers a grant that covers up to 30% of the money spent in Austria, making the country more competitive and attractive for film shoots. To get this money, productions must follow the same environmental guidelines as traditional funds and respect at least 20 out of 26 ecological criteria. From the start, ÖFI+ was also opened to the film distribution sector, using a specific list of sustainable criteria. Finally, since January 1, 2025, both the ÖFI and ÖFI+ funding tracks are available for animation films, thanks to a new dedicated catalogue of minimum ecological standards for animation ([ÖFI, n.d.b](#); ITW17).

To encourage companies to do more, ÖFI+ offers an extra 5% "Green Bonus" to the 30% grant. To get this bonus, productions must follow stricter criteria based on the UZ76 Ecolabel, meet at least 22 criteria, and pass an audit after submitting their final Green Report (Kääpä & Vaughan, 2025). This bonus is also available for distribution, theatrical releases, and animation films (since January 2025). The first results seem very positive. Even though this bonus is voluntary, most films applying for ÖFI+ also ask for the Green Bonus. In fact, official reports call this a positive "push effect." For example, in 2023, 51 films received ÖFI+ funding: 88% of international co-productions and 85% of national films obtained the Green Bonus. In 2024, out of 50 funded films, the success rate remained very high, with 87% of international co-productions and 90% of national films getting the bonus (Paul und Kollegen Consulting, 2025).

¹⁴ Bundesrecht konsolidiert: Gesamte Rechtsvorschrift für Filmförderungsgesetz, Fassung vom [22.12.2025](#)

The second financial mechanism is FISA+ (Film Industry Support Austria), created in 2023 by the Ministry of Economy through the Film Location Act FISA+ is a business-oriented cash rebate scheme that offers a 30% reduction on money spent in Austria ([FISA plus, n.d.](#)). Unlike the ÖFI, FISA+ specifically supports TV and VOD streaming series, international service productions, and post-productions, with the goal of attracting foreign investments to Austria (ITW17). The national film commission, *Film in Austria*, manages this tool and offers grants across four categories: international co-productions, service productions, post-productions, and domestic films or series (Paul und Kollegen Consulting, 2025). Just like ÖFI+, FISA+ includes an extra 5% Green Bonus if the project meets specific environmental conditions. To keep rules unified across the whole Austrian audiovisual sector, the FISA+ green criteria were modeled directly after the ÖFI+ framework, even for streaming platforms (Munch, 2025). The results for the FISA+ Green Bonus are highly successful. In 2023 and 2024, 100% of international co-productions received the bonus. For international service productions, the uptake rose from 58% in 2023 to 84% in 2024. While international post-productions remained lower (around 16%), the success rate for Austrian films and series grew from 81% to a perfect 100% in 2024. In general, professionals are very satisfied with FISA+, even though they sometimes find it difficult to hire or buy equipment that meets the certified environmental standards (Paul und Kollegen Consulting, 2025). Ultimately, this Green Bonus has provided a real boost for companies, encouraging them to adopt ecological practices systematically (ITW17).

Thirdly, regional expertise and training are driven by the film commissions of the Austrian federated states (Länder). At the subnational level, these commissions play a key role in developing green filming standards and technical expertise in Austria. The two main actors are the Lower Austrian Film Commission (LAFC) and the Cine Tirol Film Commission. Together, they formed a national working group called *Green Filming Austria* in 2019 to harmonise sustainable practices across the country ([Cine Tirol, n. d.](#)). While Cine Tirol focuses on protecting regional biodiversity during mountain shoots through its *Green Filming Tirol* initiative and *Touch Green* training program, the LAFC has developed a broader project with international impact: Evergreen Prisma (KEA European Affairs, 2024).

Although originally created at the Länder level in 2018, Evergreen Prisma has expanded far beyond its local boundaries to establish itself as a recognised platform of national and even European significance for sustainable filmmaking (Iaonid & Illiescu, 2024; Munch, 2025). This initiative evolved from early efforts in 2018, when consultancy courses for sustainable productions were first offered, and has since developed into a comprehensive transnational platform officially recognised by regional, national, and international film agencies, distributors, and co-producers (Lewis & Conway, 2024). Evergreen Prisma functions as a think tank rather than a film funding body. Its primary objectives are to "raise the profile of sustainable film and media production at a European level, bring together relevant expertise, and strategically develop the field" (ITW17). Its actions are focused on several components: collecting sustainable resources, practices and incentives for audiovisual professionals, mapping the different green consultants and suppliers, highlighting sustainability-related events ([Evergreen](#)

[Prisma, n.d.](#)). Through its Evergreen Prisma Academy, the program also trains and certifies experts via the VGFCAs training scheme. This initiative is highly successful: the number of certified consultants grew from 70 in 2022 to 90 by 2024, and hiring them is now accepted as an eligible expense by public funds (Lewis & Conway, 2024; Munch, 2025; Iaconid & Illiescu, 2024). Surpassing its original scope at the Länder level, Evergreen Prisma acts as a central hub for cross-border sustainability by leading European working groups like "CO/PRO-EUROPE" to harmonise regulations between different countries (Munch, 2025). The platform has joined several major European networks, including CineRegio Green and the European Film Academy, to promote sustainable practices across borders (Lewis & Conway, 2024). Because of this extensive work, Evergreen Prisma has received significant international recognition, including the European Cultural Brand Award for Sustainability in 2021 and multiple nominations at the Global Production Awards in 2023 and 2024 (Munch, 2025).

Domestic and international cooperation

The Austrian strategy for sustainable audiovisual production is built upon a deep-rooted culture of synergy, spanning both national and international levels, which places the efficiency of institutional networks at the heart of its policy framework.

On the national stage, all stakeholders in Austria, including Länder film commissions, agree on the importance of working together: "All [the aforementioned institutions and partnerships] together are forming the Synergy model Green Filming Austria. They are interlinked and largely harmonised. " (ITW17). This synergy helps organisations coordinate their sustainable filming rules and avoid doing the same work twice. This cooperation became official in 2023 with two new laws that included environmental criteria into the national regulations, in close collaboration with regional groups like the LAFC (Munch, 2025). In this system, the Evergreen Prisma centre plays a central role. It trains professional consultants for the VGFCAs and works with the ÖFI to improve technical criteria (ITW17). This collective effort led to the creation of Green Filming Austria. This initiative brings together 12 national and regional institutions, including the public broadcaster ORF, the Austrian Ecolabel, and the FISA+ scheme. Together, they create concrete measures, like giving extra points to funding applicants who follow the UZ76 ecolabel guidelines (KEA European Affairs, 2024).

On the international stage, Austria works hard to harmonise rules with other countries. Through the ÖFI and Evergreen Prisma, the country helps develop European transition tools. For example, it participates in the Green CO/PRO Europe think tank to harmonise funding and production practices across borders (Munch, 2025). Inside European organisations like EFAD and Eurimages, Austria's goal is to create shared tools, like carbon calculators and common criteria, while keeping the freedom to use more ambitious national labels at home (ITW17). However, Austrian stakeholders remain critical of some European rules. They note that European funding cycles are often too short. This makes it difficult to maintain technical tools and information systems over the long term. According to them, these short-term constraints can slow down

innovation because they protect old, established models instead of supporting new, agile solutions (ITW17).

Policy gaps and challenges

Despite Austria's reputation as a pioneer in sustainable audiovisual production, stakeholders identify several emerging challenges that may limit future progress. First, the issue appears to be losing momentum within the industry. Interviewees noted that the strong "green boom" observed in recent years is increasingly being overshadowed by debates surrounding Artificial Intelligence, for example (ITW11, ITW17). One interviewee summarised it: "In recent years, sustainability has been a key focus across Europe, alongside gender and diversity. Yet, over the past two years, this has seen an alarming decline and is disappearing from the agendas of major festival industry events, as well as from the public spotlight. Whilst the climate crisis is worsening, the issue is no longer finding a place in discourse or public debate." (ITW17). At the same time, sustainability efforts remain largely concentrated on the production phase, with limited attention paid to the environmental footprint of digital infrastructures and VOD services.

More fundamentally, Austria's sustainability strategy has been built around UZ76 Ecolabel on a voluntary-first philosophy, based on the assumption that incentives and industry ownership generate greater compliance than restrictive regulation (ITW11). While this approach has facilitated broad acceptance within the sector, it also creates important limitations. Progress increasingly depends on the engagement of already-motivated stakeholders, generating a selection bias that restricts further diffusion. Interviewees also highlighted a persistent tension between scientific ambitions and practical implementation, with policymakers favouring realistic and verifiable measures over more complex carbon-accounting models (ITW11). As sustainability requirements now cover most publicly funded productions, stakeholders believe that further improvements may be difficult to achieve through voluntary mechanisms alone (ITW17).

Emerging trends and future prospects

These limitations point towards the need for stronger European coordination. Several stakeholders advocated the development of common sustainability standards for audiovisual and digital services, while preserving the possibility for MS to adopt more ambitious requirements through a layered certification system (ITW11). Others emphasised the importance of strengthening European digital infrastructure, notably through environmentally regulated server capacities that could reduce dependence on non-European providers. More broadly, interviewees argued that future policies should address the entire audiovisual value chain (from development and production to distribution and digital delivery) rather than focusing predominantly on production activities. While financial incentives have proven highly effective in accelerating change, many stakeholders consider that long-term transformation will

ultimately require a combination of binding regulatory frameworks and targeted incentive mechanisms at the European level (ITW11; ITW17).

5.3. Belgium

Institutional landscape

Belgium is a federal state composed of several entities: three Regions (Flanders, Wallonia and the Brussels-Capital Region) and three linguistic Communities (Flemish, French-speaking and German-speaking), which have the same legislative powers. This federal structure has important implications for the Belgian audiovisual sector, as powers are divided between the federal state and the federated entities (Regions and Communities), and cultural competences fall primarily under the authority of these federated entities, which enjoy broad autonomy in defining and implementing their audiovisual policies. The audiovisual sector is itself divided between cultural funds governed by communities (VAF and CCA) and economic/regional funds governed by the regions (Wallimage and screen.brussels) ([Kuczerawy & Wauters, 2026](#)).

As a result, Belgium lacks a unified national audiovisual law or a federal framework governing the sector. Instead, the legal framework is defined at the regional and community level through decrees. The competence for audiovisual policymaking, which includes the regulation of cinema, media and the cultural sector, falls mainly within the scope of the federated entities ([Kuczerawy & Wauters, 2026](#)).

On the French-speaking side, the Fédération Wallonie-Bruxelles (FWB) regulates the sector through the Cinema Decree of November 2011 and through the activities of the Centre du Cinéma et de l'Audiovisuel (CCA), established in 1991, which acts as the central institution supporting audiovisual production and distribution ([Fédération Wallonie-Bruxelles, 2011](#)).¹⁵

In Flanders, the Flemish government established the Vlaams Audiovisueel Fonds (VAF) by decree in 2002 to support the creation, production and promotion of audiovisual works. The fund is financed by the Flemish government and has operated as an autonomous external agency since 2012 ([Flemish government, 1999](#)).¹⁶

Alongside this Community-based structure focused on culture and creation, a regional layer primarily oriented towards economic and territorial attractiveness also exists. Organisations such as Wallimage in Wallonia, Screen Flanders in Flanders, and screen.brussels in Brussels operate as investment funds to attract audiovisual productions to their respective territories ([Wallimage, n.d.](#); [Screen Flanders, n.d.](#); [screen.brussels, n.d.b](#)). On the media regulation side, the Conseil Supérieur de l'Audiovisuel (CSA), established by the FWB decree of February 2003, acts

¹⁵ Decree on support for cinema and audiovisual creation of [10 November 2011](#), as coordinated on 14 October 2024, published in the *Belgian Official Gazette* on 9 December 2011.

¹⁶ Decree authorising the Flemish Government to join and cooperate in the establishment of the non-profit association Vlaams Audiovisueel Fonds of [13 April 1999](#), as coordinated on 16 November 2023, published in the *Belgian Official Gazette* on 15 June 1999.

as the independent regulatory authority for audiovisual media services in the French-speaking Community, overseeing broadcasters, on-demand service providers, content obligations and financial contribution rules applicable to VOD platforms. Its Flemish counterpart, the Vlaamse Regulator voor de Media (VRM), exercises comparable functions under the Flemish Media Decree of March 2009. Despite their parallel mandates, the two regulators operate on distinct legal bases and within different policy cultures, which can lead to diverging approaches ([CSA, n.d.](#); [VRM, n.d.](#); [Kuczerawy & Wauters, 2026](#)).

The federal level still plays a role through the implementation of fiscal instruments, most notably the Belgian Tax Shelter, introduced in 2004, which represents one of the main financing mechanisms for audiovisual production in Belgium ([SPF Finances, n.d.](#)). Issues related to digital technologies, taxation, and environmental regulation are addressed by the federal government, while environmental and urban planning permits are managed by the regions. However, other aspects of the sector, such as VOD platforms and their regulation, are ruled by Communities and the federal state. While CSA and VRM are imposing financial contribution obligations on VOD platforms, the federal government manages the overall taxation aspects.

Political context

This configuration results in a blurring of competences: sustainability in the audiovisual sector is embedded into an institutional landscape comprising several levels, with decisions falling both at the regional level for financing and production practices and at the federal level for regulatory frameworks concerning technology and the environment.

This institutional framework coexists with various definitions and narratives of the SCT as described by the interviewees. For example, one interviewee suggested that the SCT should cover a wide range of policies, emphasising that environmental protection and climate transition must be linked to the social aspects of sustainability, and that sustainability extends beyond just climate change (ITW6). While current initiatives mainly focus on carbon impacts, policies should also address social dimensions such as inclusion and diversity, as these are inherently interconnected. Additionally, they highlight the importance of recognising culture as a significant economic sector, arguing that society underestimates its power to inspire and influence the future (ITW10). In practice, this holistic outlook manifests through tangible collaborations, as ITW8 integrates resource management, biodiversity, and climate transition directly into their daily work (ITW8).

Instruments and their reception

Although environmental protection does not fall directly within regional competencies, regional audiovisual support funds have gradually incorporated sustainability as a transversal dimension of their funding policies. These funds use sustainability criteria to allocate and manage their grants. Sustainability is therefore becoming a structural element of the funding process: it can take the form of explicit eco-conditionality, i.e., a condition that must be met to be eligible or to

receive the final payment of a grant, or a strong recommendation that is valued during project evaluation. Even if these mechanisms do not constitute 'hard law' in the strict legal sense, they exert a real normative influence on production practices.

Both Wallimage and the VAF have adopted a similar logic of progressive tightening of their measures. Since 2021, as part of its eco-transition approach, Wallimage has incorporated sustainability as a structural selection criterion rather than simply as an incentive with the appointment of a qualified green manager ([Wallimage, 2023](#)). From 2026 onwards, all projects funded by Wallimage must be certified in accordance with a recognised protocol ([Wallimage, 2025](#)). In practice, this means that productions will be required to demonstrate that they have undertaken the necessary steps to obtain a green certificate, while obtaining the certificate itself is not strictly mandatory, failing to demonstrate sufficient effort results in a 10% reduction of the final funding allocation (ITW6; [Wallimage, 2025](#)). As ITW6 describes it, the process evolved from encouraging productions to draw inspiration from existing protocols, to requiring a green manager, and now to demanding formal certification (ITW6). In addition to these eco-conditionality measures, Wallimage supports concrete operational changes at the production level, including energy audits of studios, good-practice guides for production teams, and mandatory contracts for green and renewable electricity (ITW6; [Wallimage, 2025](#)).

The VAF similarly conditions the final payment of its grants on the completion of a mandatory sustainability process built around the EURECA eco-calculator, a tool the VAF itself contributed to developing as a co-partner of the Green Screen Interreg project. It serves as both a management and reporting tool. For feature films and series receiving production support, it is mandatory to calculate and report CO₂ emissions related to logistical choices; otherwise, it results in a comparable 10% retention mechanism for non-compliant productions ([VAF, n.d.a](#); [VAF, n.d.b](#); ITW10). The objective, however, is explicitly framed as raising awareness rather than penalisation ; the aim is to make productions conscious of their carbon impact, not to impose a fixed emissions threshold (ITW10).

Screen.brussels, by contrast, does not apply mandatory eco-conditionality. Although in line with the objectives of the shifting economy, there is no mandatory eco-conditionality for obtaining funds. However, ecological considerations are increasingly taken into account and sustainability-related expenses such as green consultants, carbon calculators or eco labels are supported, while they also promote the EURECA carbon calculator ([Screen.brussels, n.d.a](#)). This reliance on voluntary measures is shared by media regulators. The CSA action in Wallonia, for example, relies heavily on self-regulation and raising awareness due to a lack of direct legislative tools. Following the FWB's environmental and climate transition plan, they established an environmental barometer that analyses the treatment of environmental topics across Belgian radio and television (ITW8; [CSA, 2026](#)). This barometer was expanded to cover the whole territory in 2026 ([quota climat, n.d.](#)).

The use of carbon measurement tools constitutes a central pillar of sustainability policy in the Belgian audiovisual sector. The VAF has built its sustainability process around the EURECA calculator, Screen.brussels promotes it among its beneficiaries, and Wallimage relies on Carbon'Clap, developed by the French collective Ecoprod (ITW6). There are signs that the progressive introduction of certification requirements is producing measurable results: the number of green certificates obtained by supported productions in Wallonia doubled in 2025, suggesting that even imperfect tools, when embedded in a structured and incentivised process, can contribute to a gradual shift in practices (ITW6). However, sustainability measures in the AV sector emerged from the funds. The measures promoted by the governments remain primarily focused on buildings and physical infrastructure rather than audiovisual production or content, highlighting the persistent gap between digital infrastructure regulation and the specific sustainability challenges of the VOD sector (ITW10).

Domestic and international cooperation

Belgian institutions participate in international networks such as the Eurimages Sustainability Group, which provides opportunities to exchange experiences and discuss common challenges (ITW6). The VAF's engagement at the European level is also reflected in its participation in the Green Screen Interreg project (2017-2021) and its subsequent role as a co-developer of the EURECA carbon calculator, alongside Promálaga and the Slovak Audiovisual Fund ([Interreg Europe, 2022](#)).

Several forms of collaboration among Belgian actors exist. Working groups bringing together Belgian funds and the CCA reflect collectively on the SCT of the audiovisual sector. The different actors maintain regular contacts and meet several times a year, including with broadcasters. The VAF and Wallimage also cooperate closely, and the VAF follows developments in Walloon regulation to assess whether certain measures could also be relevant for Flemish filmmakers (ITW10).

However, these collaborative efforts are not always supported equally. As interviewee 6 points out, screen.brussels does not currently have the budget to employ a dedicated sustainability manager, whereas the VAF, Wallimage and the CSA do (ITW6). In addition, none of the interviewees reported having established specific partnerships with streaming platforms (ITW6, ITW10). Collaboration therefore mainly takes place within the production ecosystem, while the VOD distribution stage remains largely absent from these exchanges (ITW10).

Policy gaps and challenges

The first gap in Belgian policy regarding the SCT in the AV sector is the fact that there is no unified Belgian framework and the transition is mainly driven by the federated entities. An interviewee said that “[...] every region has a role to play, [...], we all have our own economic prerogatives, of course. Now, what my colleagues from other regions and I have observed is that there is no strong policy at the federal level pushing in this direction, and I think that is clearly

something that is lacking at the Belgian level. Because if we simply look at the CNC, that is the French government, there is a clear policy on sustainability in place there.”

The efficiency of current measures implemented by the entities is structurally bottlenecked by a geographical and technical paradox. Regional funds are not only cultural support instruments, but they are also tools of territorial economic policy, conditioned on minimum local spending requirements. Interview 6 points out a major operational contradiction: regional funding is legally tied to mandatory local expenditure requirements. To unlock funding from multiple regional or national mechanisms, a co-production is legally forced to split its operations, leading to mandatory back-and-forth travel between regions as a direct consequence of funding conditions. This structural setup automatically generates transport pollution, highlighting a deep systemic conflict between regional economic protectionism and carbon reduction goals (ITW6).

Regional sustainability frameworks remain confined to specific fragments of the creative process, revealing a lack of continuity across the value chain. In Wallonia, a clear institutional division exists: the CCA is responsible for scriptwriting, whereas Wallimage manages the project strictly from pre-production to post-production. Consequently, both the script stage and final distribution fall outside Wallimage's environmental remit. A similar gap is observed in Flanders; for example, the VAF plan does not take into account the intended distribution choices. Specific post-production measures do exist locally, such as mandatory green electricity contracts, energy audits for studios, and code-of-conduct guides for technical teams, but the digital distribution infrastructure itself escapes regional control (ITW6; ITW10). This fragmented architecture means no single institution has the authority to oversee sustainability from script to screen. Therefore, even if a project is ecological during its central production phase, there is no guarantee that the preceding stages were eco-friendly, nor that the subsequent distribution choices will remain sustainable.

Beyond these structural gaps, practical operational and technical issues remain unresolved. Interview 10 emphasises the lack of accessible, affordable green consulting services, noting that current consultancy options are often costly and inconsistent in quality. Additionally, the sector lacks practical manuals, training programmes, and specialised tools (ITW10). The practical limitations of these tools are significant. A fundamental methodological challenge exists. The environmental footprint of a production is so deeply determined by its creative content that meaningful benchmarking between projects becomes almost impossible. A production involving international travel, will structurally generate far higher emissions than one filmed entirely in a single location not because of poor environmental management, but because of the nature of the script itself (ITW10). In response, the VAF has moved from comparative benchmarking, focusing instead on tracking each production's own trajectory without drawing cross-project comparisons (ITW10; [de Almeida Martins & Fouladvand, 2026](#)). Lastly, certain legal barriers undermine daily sustainable practices. For example, a legal

inconsistency is highlighted in which eco-friendly materials funded by the federal Tax Shelter cannot be reused or recycled for future productions (ITW6).

This fragmentation is further linked to Belgium's institutional structure. The different funds and institutions involved in the audiovisual sector depend on different governments, meaning that sustainability policies are not harmonised across the country. As interviewee 6 explains, while institutions can work together and exchange practices, any decision with legal implications ultimately depends on the competent government. As a result, different governments may adopt different approaches, even when institutions face similar challenges (ITW6). The interviews reveal that the lack of methodological harmonisation complicates field operations. Despite efforts to promote harmonisation, achieving a unified national approach or consensus across regional levels remains a significant challenge (ITW6, ITW8, ITW10). As ITW6 points out: "We could be European leaders in environmental matters if we combined our funds and resources. And that, at the Belgian level, is terrible." (ITW6).

This lack of harmonisation is illustrated by the case of the environmental barometer developed by the CSA. When launching the barometer, the CSA has contacted the VRM to explore the possibility of developing a common initiative. However, the VRM declined to participate, arguing that climate issues are not included in the Flemish legislative framework. As a result, the barometer was developed at first only on the francophone side, illustrating how sustainability initiatives can remain fragmented along institutional and linguistic lines (ITW8). This institutional divide is further exacerbated by shifting political trends. While internal funding dynamics have successfully advanced sustainability in Wallonia due to favourable political backing, negative institutional responses are frequent in Flanders, showing that environmental policy remains highly vulnerable to the varying priorities of local governments (ITW6).

Finally, a critical policy gap between corporate and project-based sustainability is highlighted. "Most of the initiatives in the industry, they focus on the project level. It's got something completely different, and with the project, you start from scratch every time with a new team, new locations, new whatever. It's like you're rebuilding a home from scratch, but both have an existence. [...] The point I want to make is that in some initiatives they focus at the company level and they will ask you to be a sustainable company and other initiatives and most of the initiatives from the film funds focus on the project level." (ITW10). In some cases, a film fund requires an isolated project to become sustainable to secure a grant, but this temporary compliance does not mean the production company permanently transforms its long-term corporate practices beyond that specific project (ITW10).

Moreover, these "green requirements" do not reach VOD platforms as digital distributors. Netflix, for example, relies exclusively on their own sustainability certification system and completely disregards frameworks established by external or local organisations. Many of these major platforms operate in a self-sufficient loop, driven by shareholders whose financial interests significantly outweigh ecological concerns, meaning they remain structurally indifferent to local

public policies (ITW6). Also, these platforms remain outside of the remit of national regulators. INT 8 explains: “So, yes, video-sharing services do fall within the scope of VOD, but at the moment there are no major video-sharing services established in Belgium, whether in the Flemish or French-speaking communities, apart from those associated with [television channels]; well, perhaps on the Flemish side... But on the French-speaking side, there aren’t any. [...] So, Netflix is based in the Netherlands, and YouTube in Ireland. If we receive a complaint on these matters, we refer it directly to the relevant regulator that is, the Dutch or Irish regulator. [...] It’s actually written in the European directive; it’s the application of European law. Procedures are currently being put in place because the content and issues involved are increasingly causing problems. It’s really becoming very complex, in fact, to deal with certain issues and certain platforms.” (ITW8).

Emerging trends and future prospects

To address these value chain gaps, interviewees emphasise the critical need to target both the very beginning and the end of the value chain. Interview 6 stresses that the industry must work directly on scriptwriting. “I think that’s where it all really begins, right from the writing stage. And that doesn’t mean we have to restrain our creativity, because that’s a topic everyone’s talking about too. [...] However, we want to work together to find solutions that use as little energy as possible, whilst still maintaining the artistic vision. [...]” (ITW6). On the other end of the chain, they highlight the unsustainable nature of traditional film distribution in cinemas, noting that physical theatres require significant energy for heating or cooling, distribute non-ecological goodies, and heavily imply car travel for audiences (ITW6). Similarly, Interview 10 points out a major policy gap in the pre-production phase, arguing that green planning should encompass everything from costumes to logistical elements, developed long before the shoot (ITW10).

Looking toward future improvements and ecosystem-wide integration, practical tools and regulatory evolutions are considered essential. It is suggested that every crew member should have access to tools such as carbon calculators to better understand the environmental impact of their logistical and technical decisions (ITW6). Furthermore, to encourage sustainability across the entire ecosystem, an interviewee suggests that VOD platforms should be treated similarly to traditional film funds. Since streaming platforms also produce their own content, it was suggested that they should be legally mandated to invest in local productions and to impose the same strict sustainability requirements as regional funds (ITW10).

5.4. Denmark

Institutional landscape

The Danish audiovisual sector comprises a national film institute, two public service broadcasters, and three regional film funds. These actors form the foundation of the country’s public film funding (ITW9).

First and foremost, the Danish Film Institute (DFI), established by the Danish Film Act¹⁷, is responsible for the promotion of film art and culture. Its objectives, funding levels, and operational frameworks are determined every four years by the Danish Parliament through a "Film Agreement," which also specifies the funding allocated to regional film funds ([Kultur Ministeriet, 2023](#)). While the DFI's primary beneficiaries are film producers applying for aid to finance their productions, the institute considers the distribution market to be free and, therefore, outside of its remit (ITW1). To complement the work of the DFI, three regional funds operate at a local level: FilmFyn, the West Danish Film Fund, and, from January 2026, the East Danish Film Fund (ITW9).

In parallel, the broadcasting landscape is driven by two public service broadcasters: DR (Danish Broadcasting Corporation), which has a public status ([DR, 2025](#)), and TV2, which holds a semi-public status ([Danish-UK Association, n.d.](#)).

Beyond public institutions, professional groups also play a significant role in Denmark. On the one hand, there is Vision Denmark, a cluster of Danish organisations and companies active in games, film, TV, animation, and XR. Vision Denmark is a sectoral cluster regrouping actors in the digital sector in Denmark, and it maintains a specific work axis dedicated to sustainable actions ([VisionDenmark, n.d.](#)). Its members include the different financing partners active in Denmark: the regional film funds, the DFI, the broadcasters, as well as the Danish Producers' Association (Producent Foreningen) (ITW9). Finally, it is crucial to highlight that Denmark's audiovisual strategy extends beyond its borders. Through its participation in the Nordisk Film & TV Fund, the country is integrated into the broader Nordic audiovisual ecosystem, leveraging regional co-productions to amplify its domestic sector ([Nordisk Film & TV Fund, 2026](#)).

Political context

Denmark adopted its Climate Act in 2020, committing the country to a legally binding 70% reduction in greenhouse gas emissions by 2030 compared to 1990 levels, alongside a target of climate neutrality by 2050 ([Danish Ministry of Climate, Energy and Utilities, 2020](#)). Climate change is widely perceived as a pressing national concern: 35% of Danish respondents in a European survey consider it the most important global issue, placing Denmark second only to Sweden (41%), alongside the Netherlands, and well above the European average of 17% ([European Commission, 2023](#)). Within Denmark, the climate issue is primarily framed around transportation (ITW1, ITW9).

Within the audiovisual sector specifically, one interviewee noted that climate change has become a cross-cutting concern addressed across sectors, whether classified as cultural and creative industries or not, and that an increasing number of films now seek to engage with climate themes. The audiovisual and VOD sector is not perceived as more environmentally

¹⁷ Lov nr. 186 af [12. marts 1997](#) om film.

impactful than other industries, but rather as holding greater potential to convey a climate message through its content (ITW1).

This growing societal and sectoral awareness has not, however, translated into binding obligations for the audiovisual industry: no specific statutory requirements have been codified for film and television, whether in the Media Agreement 2023-2026 or in the Film Agreement 2024-2027 ([Møller et al., 2025](#)). Accordingly, the mandate granted to the DFI by the Ministry of Culture makes no mention of environmental considerations.

Instruments and their reception

The sustainability measures within the Danish audiovisual sector did not follow a strictly sequential or dichotomous logic opposing private-sector initiative to public-sector reaction; rather, they emerged from an overlapping network of private and public actors. For analytical clarity, this section first examines sector-wide initiatives, which are often industry-driven but frequently co-constructed with public bodies, before turning to the instruments developed by public governance actors.

Illustrating this sector-wide dynamic, Vision Denmark has been committed to improving the adoption of sustainable practices for several years. In 2020, this commitment materialised through an alliance named "BFTP" (Sustainable Film and TV Production), established in collaboration with the Producers' Association, the DFI, and the regional funds, , underlining the alliance's public-private character from its beginning ([DFI, 2020](#)). This coalition has since expanded to include other organisations and stakeholders, namely DR, TV2, the Danish Actors' Union, Danish Film Directors, the Danish Playwrights' Association, and the Copenhagen Film Workshop (KEA European Affairs, 2024; Philipsen et al., 2024). The primary objective of this alliance is to finance a gradual transition toward sustainable practices within the Danish audiovisual sector. Concretely, BFTP serves as Vision Denmark's working group on climate issues in the film and TV industry, developing shared experience and knowledge through networks and tools (KEA European Affairs, 2024). An example of this practical application arose when TV2, one of the public broadcasters in Denmark, adopted the Green Film certification from the Trentino Film Commission; consequently, a guide was written in Danish to align the tool with the local industrial context (Philipsen et al., 2024; ITW9). In the absence of overarching global or national regulations at the time, the issue has been addressed primarily at the organisational level, across private companies and public bodies alike (ITW9). Beyond their role as founding members of Vision Denmark, Denmark's three regional film funds are directly engaged in this sector-wide sustainability effort through their participation in BFTP alongside the DFI and the broadcasters. Their involvement illustrates that the sustainability transition is being organised not only at the national level, but across Denmark's regional film infrastructure as well. Documentation on region-specific initiatives beyond this collective framework remains scarce, which may reflect a literature gap rather than an absence of regional action.

In addition to institutional networking, Vision Denmark has actively driven ecologically sustainable filming research including private and public actors. Notably, Vision Denmark also financed a research project active between September 2023 and December 2024, led by the University of Southern Denmark and its Climate Cluster ([Svennevig, 2023](#)). Other leading participants included the Danish Agency for Higher Education and Science, TV2 Denmark, three production companies, the Green Producers Club Denmark, and a construction company (Philipsen et al., 2024). This research initiative culminated in a survey of industry professionals, which served as the empirical foundation for formulating strategic recommendations for sectoral change (Philipsen et al., 2024).

Parallel to Vision Denmark's efforts, the Danish Producers' Association is also committed to more sustainable practices in filmmaking, acknowledging them in its statutes as a key factor reshaping the Danish market ([Producentforeningen, 2025b](#)). This formal institutionalisation reflects the significant role played by industry bodies in driving early sustainability commitments, though, as the examples above suggest, these efforts were closely interwoven from the outset with public actors such as the DFI, the regional film funds, and the public broadcasters. Ultimately, the association aims to facilitate this ecological transition by proactively building sectoral capacity. To this end, the Producers' Association welcomed the implementation of the NES and expressed its willingness to submit recommendations to facilitate the transition within the sector. Moreover, on December 4, 2025, the association announced the launch of a new competence project in collaboration with BFTP partners to better prepare the industry for this transition ([Producentforeningen, 2025a](#)).

Furthermore, the two public service broadcasters, DR and TV2, constitute major funding sources for the domestic cinematographic sector. Given their corporate scale, both organisations fall under the scope of the CSRD and are consequently mandated to publish annual sustainability reports detailing their environmental and social commitments. In its 2024 annual report, DR highlights a structural shift towards organisational sustainability, noting that "the initiatives initiated have increasingly become part of everyday life and employees and departments are increasingly demanding how they can work with sustainability within their area" ([DR, 2024, p. 64](#)). This integration was further institutionalised through targeted management meetings and specific industry events, such as the 2024 Production Matters conference. On an environmental level, DR has committed to reducing building energy consumption, enhancing waste recycling, and establishing sustainable procurement policies with aligned suppliers. Crucially, regarding audiovisual production, the broadcaster introduced comprehensive guidelines in 2024. These guidelines mandate all external productions to submit both a sustainability plan and a pre-production climate budget, followed by a final carbon footprint assessment upon completion. Furthermore, in its 2024 reporting (published in early 2025), DR addresses the digital carbon footprint associated with streaming services. Utilising the Carbon Trust methodology, the broadcaster is currently refining its data accuracy in collaboration with the Technical University of Denmark within the framework of the European Broadcasting Union (EBU) working group ([DR, 2024](#)). Parallel to DR's initiatives, TV2 operates within the European

Sustainability Reporting Standards (ESRS) framework, conducting its reporting through the lenses of double materiality assessment and due diligence. In 2026, TV2 launched its strategic roadmap extending to 2030. This strategy directly shapes production practices through mandatory guidelines. Specifically, since January 2024, TV2 has required external producers to supply a Sustainability Plan and a CO2 budget before production begins, and a detailed carbon assessment ([TV2.n.d](#)).

On the other side of the spectrum, public governance bodies such as the DFI and the regional film funds operate under a different set of formal requirements than those imposed on the broadcasters by corporate sustainability law. Specifically, as of 2026, the statutory framework governing the DFI and regional film funds does not formally establish ecological sustainability as a mandatory, legally binding objective ([Svennevig, 2023](#)). However, a change is expected in the following years: "we don't as of yet have specific measures targeting our sectors. So in theory, we are expecting measures to hit us at some point because no sectors can be free. But at the moment we don't have it" (ITW1). This implies that sustainability metrics are excluded from their performance targets for the current regulatory period, and are therefore outside their official mandate ([Kultur Ministeriet, 2023](#); ITW1). Consequently, a regulatory vacuum exists within the domestic audiovisual sector; although Denmark has enacted legally binding national carbon reduction targets, no specific statutory obligations have been codified for the film and television industry, neither in the Media Agreement 2023-2026 nor in the Film Agreement 2024-2027 ([Møller et al., 2025](#)).

Nevertheless, an interview reveals that the DFI has positioned itself as a facilitator of sectoral change, emphasising a highly pragmatic approach to transition management (ITW1). Given that their primary beneficiaries are producers, the DFI could potentially, in the future, link certain measures to the granting of funding. However, the institute consciously distinguishes this production-focused support from the downstream distribution market: "Distribution is considered a free market and often distribution will be part of a financing of a film. But a film production is not a public product. A film production is made by an independent producer that gets part of the findings from the public sector, and of course the public sector money comes with certain demands, but in the end ...we don't decide if Nordic Film Productions comes to us and gets financing. We don't decide if they want to distribute on Netflix or HBO; that's their own partners. They negotiate that part of the contract." (ITW1). While acknowledging the carbon footprint generated by digital streaming infrastructure, the DFI views the distribution market as inherently free and outside its regulatory scope. It maintains that commercial platforms bear individual responsibility for mitigating their environmental impact through voluntary initiatives, driven either by broader corporate governance legislation or consumer demand (ITW1). Nevertheless, should distributors seek guidance, the DFI would be willing to assist (ITW1). The DFI's and regional bodies' commitment to the BFTP initiative further demonstrates a desire to help the sector organise around these issues ([BFTP.n.d](#)).

Since January 1, 2026, the Nordic Ecological Standard (NES) has been implemented by the organisations of the Nordisk Film & TV Fund. On the Danish side, four organisations are involved in this implementation: the Danish Film Institute, DR, TV2, and the Producers' Association. Within Denmark, these institutional partners are currently jointly customising the NES requirements to fit the domestic market. The NES framework is structured around six distinct operational categories, requiring productions to fulfil a specific baseline of criteria to achieve official "sustainable" status. Reflecting the DFI's non-coercive approach, no partners had yet linked the standard to sanctions, though this is likely a long-term goal; the objective is to allow for a gradual transition. There is also a possibility to deviate from the objectives, provided it can be justified (ITW1).

Domestic and international cooperation

On an internal level, as previously outlined, there is communication between various stakeholders in the Danish audiovisual sector regarding sustainability issues, primarily through the BFTP alliance ([DFI, 2020](#)). In fact, the DFI collaborates with them to harmonise approaches and strategies, and to offer joint training to all stakeholders (ITW1).

At the European level, while Denmark is represented in several bodies that discuss sustainability, such as EFAD via the DFI, this specific arena is not currently perceived as the most relevant for advancing these environmental interests (ITW1). In contrast to this limited European impact, regional Baltic-Nordic cooperation has proven far more dynamic. This is notable in the collaboration surrounding the newly implemented NES. This certification framework itself stems from a transnational knowledge-sharing initiative and joint training sessions delivered to Nordic stakeholders by a German academic institution (ITW1). Underlining the national consensus on this regional tool, the Danish Film Institute, the Producers' Association (Producentforeningen), DR, and TV2 have all formally committed to adopting the NES guidelines ([DFI, 2025](#)). Finally, it should be noted that there is a planned collaboration with the Baltic states, which are interested in the NES principle, with the aim of extending this framework to these countries (ITW1, [NB8-Grants, n.d.](#)).

Policy gaps and challenges

The discussion with two interviewees from different bodies in Denmark revealed a global impression that the integration of sustainability into film policy and society as a whole reached a peak a few years ago and is now receiving less attention. This shift is attributed to a geopolitical "drawback" initiated by the United States on climate issues (ITW9; ITW1). Despite this slowdown, significant advancements have been realised in recent years, such as better awareness and more developed knowledge within the sector (ITW1; ITW9). For instance, several TV2 productions were certified by the Green Filming label ([Green Film, 2022](#)). Above all, it should be emphasised that in Denmark, these changes emerge more from the sector's professionals rather than state-led political initiatives (ITW1). As an example, global market players, such as Netflix, implement their own sustainability criteria, including for their Danish

productions ([Jessen, 2024](#)). The European CSRD directive, which requires Danish broadcasters to calculate and report their CO2 emissions, has also played a role in pushing towards these issues (ITW9).

However, translating this corporate awareness into unified public policy exposes systemic challenges, primarily rooted in the restricted size of the Danish market. Because of the small domestic market, Danish producers are mostly dependent on international funds, co-productions and foreign funding, which inherently necessitates cross-border travel and transport-related emissions (ITW9; [Nielsen, n.d.](#)). To mitigate this, the public sector must offer financial incentives to drive behavioural change among producers; yet, under the current policy framework, such mechanisms are non-existent (ITW1). Furthermore, public authorities currently lack any regulatory instruments to monitor or incentivise distributors, leaving a significant portion of the value chain unaddressed (ITW1). Consequently, field actors argue that the most effective path forward lies in a "follow the money" strategy, introducing targeted financial incentives and constraints that align economic viability with ecological compliance (ITW9). Nevertheless, institutional caution must be exercised to avoid creating an excessive administrative burden, as was reported with the CSRD and the SDGs implementation (ITW1; ITW9).

Emerging trends and future prospects

To resolve these regulatory bottlenecks, stakeholders have formulated a series of multi-level strategic proposals, focusing heavily on the production stage. Because independent producers and public broadcasters already operate in close contact with public authorities and receive state subsidies, they represent the most viable leverage points for immediate regulation (ITW1). Strategic recommendations operate across three distinct levels. On a local level, field actors express a clear desire to prioritise decentralised measures. They advocate for the DFI to implement visible accountability and measurement frameworks to ensure precise tracking and quantification, provided these mandates are backed by adequate public funding (ITW1). Simultaneously, public institutions and regional funds must harmonise their efforts to guarantee a uniform baseline of sustainability knowledge across the workforce, while still allowing motivated pioneers to pursue advanced sustainable practices (ITW1). On an international scale, a fundamental restructuring of the co-production model is required to address the carbon costs inherent to geographical mobility. Developing a regional circular economy model, ideally coordinated at the EU level, presents a highly promising avenue (ITW1). While stakeholders welcome EU-wide financial and regulatory harmonisation, they strongly reject a unified European carbon calculator: "I think it's good that big programmes like Creative Europe set up demands because it does have an impact on the logic in national countries, but I think some of the particular strategies that they are pursuing are crazy. They want to, for example, spend money on building a European harmonised carbon calculator, which is completely nonsense project because carbon measuring is like you multiply 7 by 6 and it's just like in one tool you have decided to use the six and as an emission factor and in another tool you use the seven." (ITW1).

Finally, significant transformative potential rests at the individual firm level. Production companies can leverage narrative content to actively normalise sustainable practices. Furthermore, long-term business models should pivot toward economic sustainability by systematically valorising and re-utilising existing high-quality content catalogues rather than relying solely on new productions (ITW9).

5.5. France

Institutional landscape

The French audiovisual regulatory landscape is structured around three key institutions with distinct but complementary mandates. The Centre National du Cinéma et de l'image animée (CNC), established by the Act of 25 October 1946 and placed under the authority of the Ministry of Culture since 1959, operates as the central institution responsible for the regulation and financing of the French cinema and audiovisual sectors. Functioning as an administratively and financially autonomous body under the Cinema and Moving Image Code (formalised by Decree No. 2009-926 of 24 July 2009), it combines automatic subsidies based on commercial performance with selective subsidies granted on merit.

Media regulation falls under the Autorité de régulation de la communication audiovisuelle et numérique (ARCOM), an independent regulator established to oversee broadcasters, on-demand service providers and online platforms, with responsibilities extending to content obligations, the financing of audiovisual creation, and the protection of rights. Notably, ARCOM plays a key role in the implementation of the REEN law (Loi visant à réduire l'empreinte environnementale du numérique)¹⁸, through public awareness and the oversight of environmental practices in the audiovisual sector.

Finally, the Agence de la Transition Écologique (ADEME), a public agency under the joint supervision of the ministries of Ecological Transition, Economy and Higher Education, provides technical expertise, funding support and research capacity across all dimensions of the ecological transition, including digital infrastructure and media-related environmental impacts; and constitutes a key interface between public policy and sectoral actors seeking to reduce their environmental footprint ([ADEME, n.d.](#)).

The regional level constitutes a complementary layer of the French audiovisual institutional landscape. France has an extensive network of regional film funds within the framework of cooperation agreements (conventions de coopération), which co-finance productions alongside the CNC and typically require a minimum level of local spending in their territory as a condition of support. These funds operate under the joint authority of regional councils and the CNC, and their funding criteria are framed within the broader national audiovisual policy objectives set by

¹⁸ Loi n° 2021-1485 du 15 novembre 2021 visant à réduire l'empreinte environnementale du numérique en France. ([2021](#)). Journal officiel de la République française, n° 0266, 16 novembre 2021.

the CNC. While their primary mandate is economic and territorial, they have progressively become actors of the sustainability transition as the CNC's Plan Action! framework has set new expectations across the entire funding ecosystem ([Senat, 2023](#); [Ecoprod, n.d.b](#); [CNC, n.d.](#)).

Beyond these governmental and regulatory bodies, the French audiovisual sustainability landscape also includes industry-led initiatives. The most significant is Ecoprod, created in 2009 as a professional collective and formalised as an association in 2021, with the support of the CNC and founding members including Canal+, France Télévisions and TF1. The association develops practical tools, most notably the Carbon'Clap calculator, alongside methodological guides, training programmes and a production label verified by an independent third party. Operating in close coordination with the CNC and ADEME, Ecoprod constitutes a key interface between public policy objectives and production practices across the French audiovisual sector ([Ecoprod, n.d.a](#)).

Political context

The interviews suggest that the SCT in the French audiovisual sector is primarily understood as reducing the sector's environmental footprint. Respondents consistently call for the audiovisual industry to contribute to broader decarbonisation objectives and to align with the low-carbon trajectory associated with the Paris Agreement. In this perspective, the sector is treated as an economic activity that must reduce its emissions in the same way as other sectors of the economy (ITW5; ITW14). At the same time, the interviews reveal a broader understanding of sustainability that goes beyond carbon reduction alone. While environmental concerns remain central, sustainability is increasingly approached through a more comprehensive framework that also incorporates social dimensions (ITW14).

The relationship between culture and sustainability remains, however, nuanced. On the one hand, respondents acknowledge that audiovisual works can influence representations, behaviours and public awareness of environmental issues. On the other hand, there is a reluctance to consider the content of cultural works as a direct object of public policy intervention. Then, sustainability policies tend to focus primarily on production processes and professional practices rather than on shaping the narratives or themes addressed by audiovisual works (ITW5). At the same time, the sector is perceived as having a potential exemplary role that extends beyond its economic weight alone (ITW5; [CNC, n.d.](#)).

Several respondents also emphasise the role of innovation and technological progress in supporting the transition. The development of new technologies, together with the growing importance of eco-design approaches, is viewed as an important lever for reducing environmental impacts and facilitating the sector's adaptation to sustainability objectives (ITW16). Instruments and their reception

In France, environmental reports published by the CNC in 2023 highlight the energy challenges facing the sector in the country. However, the figures mainly assess the effects of filming and

cinema distribution and overlook the energy challenges associated with distribution on VOD platforms. The organisation recognises the lack of consolidated data on the sector's overall environmental impact and has created a permanent observatory to improve the collection and monitoring of indicators (Kemna et al., 2020; [CNC, n.d.](#)).

Alongside this, the CNC has launched Plan Action !, which aims to integrate ecological transition into French cinema and audiovisual policy. It is based on a non-binding approach that aims to oblige aid recipients to measure and document their environmental footprint rather than setting a maximum emissions threshold ([L'Info Durable, 2024](#)). Since 2024, French public subsidies have been linked to the environmental performance of audiovisual productions via a two-stage carbon assessment mechanism: the provisional carbon assessment, carried out at the time of the subsidy application, and the final carbon assessment, to be provided at the end of the project. The first assessment allows the environmental footprint of the various production phases to be anticipated and the most significant sources of emissions to be identified. The second assessment measures the actual impact after the project has been completed and compares the results with the initial estimates. These assessments are mandatory conditions for access to automatic and selective aid ([CNC, 2025](#)).

At the regional level, several French film funds have incorporated sustainability requirements into their support schemes, often in line with the CNC's eco-conditionality framework. In the Île-de-France region, projects implementing innovative sustainable practices can receive an additional grant ranging from €25,000 to €100,000. Eligible measures include environmental training, the appointment of sustainability coordinators, the use of carbon footprint calculators and certification schemes such as Ecoprod or AFNOR Spec. In Corsica, an eco-bonus is available for feature films and series that comply with environmental recommendations developed by the Office de l'Environnement de la Corse and based on the Ecoprod framework ([Ecoprod, n.d.b](#)). Nouvelle-Aquitaine has also identified the ecological transition as a priority in its audiovisual support strategy for 2025-2030 ([Région Nouvelle-Aquitaine, 2026](#)).

Interviewees describe carbon accounting as one of the central pillars of the French approach to sustainable transition (ITW5; ITW14). Rather than imposing a single calculator, the French system relies on an accreditation mechanism through which approved tools must comply with a common set of specifications defined by public authorities (ITW5). The objective is not only to monitor individual productions but also to generate quantitative evidence on sectoral practices and identify the main sources of emissions across the industry (ITW5). Several respondents stressed that measuring emissions is considered a prerequisite for setting realistic objectives and designing future policies (ITW5; ITW14). In 2023, two methodologies were approved by the CNC: Carbon'Clap, the carbon calculator developed by Ecoprod, and SeCO₂, developed by Secoya Eco-Tournage (Kopeć et al., 2024, [Ecoprod, n.d.a](#)) These procedures enable the CNC to collect statistical data on production activities in order to consolidate sectoral data and feed into the environmental observatory (Kopeć et al., 2024; Kemna et al., 2020; KEA European Affairs, 2024).

The effects observed so far are primarily linked to awareness-raising. Interviewees emphasise that carbon calculators encourage producers to better understand the environmental consequences of their choices and provide the sector with a shared basis for discussion (ITW5). According to Ecoprod, around 280 productions have engaged with the labelling process, resulting in more than 230 effective certifications (ITW14). Studies conducted with ADEME further suggest that productions applying the full range of recommended measures can reduce their carbon footprint by up to 41% (ITW14). At the same time, several limitations were identified. One respondent noted significant discrepancies between the results produced by the different approved calculators currently available in France, raising questions about methodological consistency and the future evolution of accreditation criteria (ITW5).

Ecoprod also plays a central role in the French ecosystem by combining measurement tools, training resources and sustainability certification mechanisms. Beyond the label itself, several incentive mechanisms have progressively emerged. Cofiloisirs, a subsidiary of a banking group, awards an additional €20,000 endowment to five of its clients whose productions achieve the highest environmental scores based on the Ecoprod carbon calculator or the Ecoprod label. Some private companies have also started adapting their pricing policies, offering reduced rates to certified productions ([Cofiloisirs, n.d.](#); ITW14). However, these incentives remain relatively limited and one respondent suggested that wider adoption across the sector would strengthen their effectiveness (ITW14).

In addition to the Plan Action I, the CNC acts as operator of the “Alternatives Vertes” programme as part of France 2030, a national scheme led by the General Secretariat for Investment. This programme aims to support the emergence of innovative and structuring ecologically sustainable alternatives that are capable of sustainably transforming cultural practices across the entire value chain and generalising environmental impact assessment. It also finances the development of measurement tools, the upgrading of skills among stakeholders and the creation of training and awareness-raising programmes. The first call for proposals, launched in 2021, supported 35 projects, and the second edition in 2024 selected 27 projects focusing in particular on the decarbonisation of film sets, the eco-renovation of heritage sites and the measurement of the biodiversity footprint of artistic practices ([Ministère de la Culture, 2023](#)).

Another important component of the French framework concerns the environmental impact of digital services and audiovisual consumption. The REEN law extends the ecological transition to the entire digital sector, including streaming services and data centres. Articles 22 and 23 relate to data centres and aim to promote more energy-efficient data centres and networks by imposing energy transparency and energy efficiency indicator disclosure requirements on data centres and digital service providers.¹⁹

¹⁹ Loi n° 2021-1485 du 15 novembre 2021 visant à réduire l’empreinte environnementale du numérique en France. ([2021](#)). Journal officiel de la République française, n° 0266, 16 novembre 2021.

Interviewees highlighted that the REEN framework assigned several new responsibilities to sectoral regulators and public authorities (ITW16). In particular, Article 25 led to the development of a General Framework for the Eco-design of Digital Services, which also applies to audiovisual services and VOD platforms. Rather than relying on sanctions, this framework is intended to support organisations through guidance, documentation and recommendations aimed at reducing the environmental footprint of digital services (ITW16; [République française, 2021](#))

Article 26 of the text directly targets streaming services, VOD and video sharing platforms. It stipulates that the Conseil supérieur de l'audiovisuel (now ARCOM), in conjunction with ARCEP and ADEME, shall publish recommendations encouraging environmental transparency and user awareness ([République française, 2021](#)).

As part of this mandate, recommendations were issued encouraging audiovisual services to provide users with information about the environmental footprint of audiovisual consumption, promote eco-friendly practices and participate in the development of common methodologies for environmental measurement. The broader objective is to improve awareness among both service providers and users while fostering the gradual adoption of eco-design principles throughout the sector ([Arcom, 2023](#); [Arcom, 2025](#); ITW16).

Beyond REEN law, interviewees also referred to the Climate and Resilience Law, which entrusted public authorities with the task of assessing the environmental footprint of audiovisual uses across their life cycle ([République française, 2021](#)).²⁰ This work has resulted in studies measuring the impact of different forms of audiovisual consumption and in the development of prospective scenarios assessing the potential effects of eco-design measures on the sector ([Arcom, 2024](#); ITW16). Respondents stressed that these initiatives seek to encompass as many actors as possible across the value chain and to support evidence-based policymaking through measurement, monitoring and reporting mechanisms (ITW16).

Although these measures do not impose binding obligations on platforms, they establish a regulatory basis for the production of environmental data, public awareness and the eco-design of audiovisual interfaces. It is part of an ecological soft law approach aimed at strengthening the responsibility of digital players.

Domestic and international cooperation

Interviewees describe ongoing dialogue with audiovisual professionals to adapt sustainability frameworks, tools, and standards to the realities of the sector. This collaborative approach is particularly visible in the development and implementation of the AFNOR framework, which

²⁰ Loi n° 2021-1104 du 22 août 2021 portant lutte contre le dérèglement climatique et renforcement de la résilience face à ses effets. ([2021](#)). Journal officiel de la République française, n° 0196, 24 August 2021.

relies on continuous exchanges between public institutions, industry organisations and audiovisual practitioners ([ADEME, n.d.c](#); ITW5; ITW14).

The French ecosystem relies on cooperation with specialised organisations and technical partners. Ecoprod collaborates with the CNC and the Ministry of Culture on sustainability frameworks and maintains regular exchanges with initiatives such as Albert, whose representatives participate in events dedicated to co-productions and environmental transition (ITW14). Cooperation also involves ADEME, which contributes to impact assessments, carbon reduction studies and prospective scenarios aimed at supporting evidence-based sustainability policies ([ADEME, n.d.b](#); ITW14). They also highlight exchanges with streaming platforms and broadcasters on sustainability-related issues. While no platform is described as a privileged interlocutor, dialogue takes place through industry events, roundtables and professional exchanges bringing together public institutions, audiovisual organisations and digital actors (ITW5).

Regular exchanges with European networks and institutions are mentioned, notably through participation in EFAD, Eurimages and dedicated sustainability working groups bringing together national film agencies and sector representatives. Such forums are used to discuss common challenges, exchange practices and coordinate approaches to environmental transition across the European audiovisual sector (ITW5; [EFAD, n.d.c](#)).

Finally, at the infra-national level, cooperation takes place. In addition to national and European initiatives, respondents refer to partnerships with French regional authorities to develop local sustainability actions and incentive mechanisms. These collaborations aim to foster the emergence of regional eco-bonus schemes and other initiatives designed to encourage more sustainable production practices across different parts of the country (ITW14; [Senat, 2023](#); [Ecoprod, n.d](#); [CNC, n.d.](#)).

Policy gaps and challenges

Despite the progress made in recent years, respondents identified a number of challenges linked to the implementation and further development of sustainability policies in the French audiovisual sector.

A first issue concerns the role of measurement tools. Carbon accounting is generally viewed as a necessary starting point, both to understand environmental impacts and to guide future action. However, several interviewees stressed that measuring emissions is not an objective in itself and must be accompanied by training, awareness-raising and concrete changes in professional practices (ITW5; ITW14). While France has invested heavily in carbon assessment tools, methodological differences between approved calculators remain a concern and may complicate the comparability of results across productions (ITW5). Respondents therefore highlighted the need for more precise reporting, continued research efforts and the

development of common methodologies capable of producing robust and comparable data (ITW5; ITW16).

A second challenge lies in the ongoing debate regarding the balance between incentives and obligations. Current French policies largely rely on support mechanisms, sustainability bonuses and accompanying measures designed to help organisations adapt to new practices. This broader reliance on soft-law approaches can be illustrated by the role of the media regulator: “[...] all the Arcom missions [in this area] are based on soft law. They are support missions, involving documentation and the production of tools. They try to encourage action, but have very few missions, at least in this area, that involve sanctions or impose obligations.” (ITW16)

Respondents acknowledged that changing production habits is a gradual process that requires time, training and sectoral support (ITW5). At the same time, several interviewees questioned whether incentive-based approaches alone would be sufficient to accelerate the transition. Some argued that existing bonuses should eventually be complemented or replaced by stronger conditionality mechanisms, for example by linking public support more directly to compliance with sustainability criteria or environmental standards (ITW14; ITW16). Others nevertheless stressed the importance of maintaining progressive and adaptable frameworks rather than imposing fixed carbon thresholds that could prove difficult to implement across productions with different capacities and constraints (ITW5).

Finally, significant challenges emerge at the international and European levels. Interviewees highlighted potential risks associated with cross-border coordination, noting that mutual recognition of labels and certifications could encourage convergence towards the least demanding standards if significant differences persist between countries in terms of resources, regulatory capacities and environmental expectations (ITW14). Also, the difficulty of engaging international platforms, which often operate according to their own sustainability policies and frameworks, was identified as a major structural challenge that remains difficult to address through isolated national initiatives (ITW16). As ITW5 explained: “On VOD platforms, given the financial weight [and size] of these giants, [...] I don’t really see what kind of financial incentive could be found. For it to be incentive-based, the budgets involved would have to be significant, so I imagine we would have to rely on constraints instead. But since these platforms are international, the ideal solution would indeed be regulation at least at the European level [...]” (ITW5).

Emerging trends and future prospects

Looking to the future, a central emerging trend concerns the need to move beyond a narrow focus on production towards a more systemic perspective. While production remains a priority intervention point, respondents emphasised that environmental impacts emerge throughout the value chain and that sustainability policies should adopt a more systemic perspective (ITW14; ITW16). This includes integrating environmental considerations at the earliest stages of project

development, working with eco-responsible partners and suppliers, and involving dedicated sustainability coordinators during production. “We communicate a lot about the fact that anticipation is a very important part of a successful eco-production approach. [...] Having an eco-production coordinator involved well in advance of the project, rather than bringing someone in a week before to try to obtain [bonuses and labels] urgently, is essential. For the process to be done properly, they need enough time to do their job, analyse the project, genuinely assess the risks and propose effective alternative solutions to make the approach successful.” (ITW14).

Interviewees also stressed the importance of eco-design, the environmental footprint of digital devices and terminals, and the broader impacts associated with distribution and consumption practices (ITW16). The value chain is therefore viewed as highly interdependent, requiring cooperation between producers, distributors, platforms, regulators and audiences rather than isolated interventions targeting only one segment of the sector (ITW16).

In this context, many discussions point towards promising prospects at the European level. Respondents repeatedly argued that sustainability frameworks would benefit from greater harmonisation across Europe, notably through common standards, shared certification systems and stronger coordination between national approaches (ITW5; ITW14). Such harmonisation could facilitate implementation for producers operating across borders and reduce the fragmentation of existing sustainability requirements, and provide a more effective framework for engaging international platforms through coordinated European action (ITW14; ITW16).

Finally, respondents emphasised that the sustainable transition should not be understood solely as a source of constraints and additional costs. While changing established practices often generates resistance and uncertainty, interviewees also identified important opportunities associated with the transition. The emergence of specialised service providers, the development of new professional expertise and potential productivity gains were cited as examples of how sustainability can become a driver of innovation rather than merely a regulatory obligation (ITW5). More broadly, respondents observed growing societal awareness of climate issues and increasing expectations from both consumers and industry actors regarding environmental responsibility (ITW5; ITW14; ITW16). Although international frameworks such as the Paris Agreement are not necessarily used as direct operational tools, they contribute to shaping the broader trajectory within which the sector increasingly operates (ITW5, ITW14). In this context, the continued development of sustainability policies is generally perceived not only as a response to environmental imperatives but also as an opportunity to anticipate future market expectations and structural transformations within the audiovisual industry.

5.6. The Netherlands

Institutional landscape

The Dutch audiovisual sector is mainly organised around two public institutions. The Netherlands Film Fund (Nederlands Filmfonds), established in 1993, operates as an independent administrative body under the supervision of the Ministry of Education, Culture and Science. It is the main public organisation responsible for supporting film production, festivals and professional development through a combination of selective and automatic funding schemes ([EFAD, n.d.a](#); [NFF, n.d.a](#)).

Media regulation is overseen by the Dutch Media Authority (Commissariaat voor de Media, CvdM), an independent regulator established in 1988 under the Media Act 2008. The CvdM supervises broadcasters and VOD services, monitors compliance with advertising and content rules, and oversees the implementation of audiovisual regulation ([CvdM, n.d.](#)). Following the transposition of the AVMSD in 2020, on-demand audiovisual services were brought under the same regulatory framework as traditional broadcasters ([Ó Fathaigh, 2021](#)).

Political context

Regarding the national climate policy, the Netherlands has adopted a national Climate Act (Klimaatwet), which provides the framework for Dutch climate policy. It sets a target of reducing greenhouse gas emissions by 55% by 2030 compared with 1990 levels and achieving climate neutrality by 2050. The Act is complemented by the Climate Agreement (Klimaatakkoord) and the Climate Plan (Klimaatplan), which translates national climate objectives into measures and commitments involving public authorities, businesses and other stakeholders ([Government of the Netherlands, n.d.](#); [Government of the Netherlands, 2019](#); [Government of the Netherlands, 2025](#)).

No public institution is specifically responsible for sustainability within the audiovisual sector. In practice, this issue has largely been taken up by the Netherlands Film Fund, which has developed its own sustainability initiatives in the absence of broader governmental guidance. At the industry level, GreenScreen.nl has become a key actor by providing sustainability consultancy and eco-management services to audiovisual productions, often in cooperation with the Film Fund ([Pan, 2024](#)).

Instruments and their reception

In the Netherlands, the current strategy aims to raise awareness and equip the sector with tools for sustainability rather than linking funding from the Netherlands Film Fund to green targets or certified carbon footprints. These guidelines are clearly defined in the General Regulations 2025, which mention the contribution to professionalisation and a more sustainable sector among the general evaluation criteria, without making it a condition for project eligibility or final payment

([NFF, 2025](#)). This approach reflects an institutional choice. Approximately six years ago, in the absence of broader governmental guidance or specific direction from the Ministry of Culture, the Netherlands Film Fund decided to take ownership of the issue and begin working on sustainability independently. The Fund first partnered with Utrecht University on a study aimed at understanding production practices and their environmental impacts. The resulting report concluded that production activities generate the largest share of emissions within the audiovisual value chain, leading the Fund to focus its initial efforts on production as the most accessible area for intervention (ITW4).

Since 2015, however, the Fund has established a Sustainability Manager role to promote environmentally sustainable filmmaking practices among beneficiaries ([NFF, 2014](#); [Green Film Making, 2014](#)). In 2024, the Fund further increased awareness through various tools to advance CO₂ footprint assessment at the project level, without introducing any new regulatory constraints ([Pan, 2024](#)). The resulting strategy was built around two pillars: awareness building and facilitating behavioural change. Sustainability consultancy and management support services were introduced, with financial compensation of up to €3,000 for sustainability consultancy during the development phase and support from an eco-manager during production. “And we offer film producers who are in a development stage for their feature project consultancy. In an early stage, because one of the things we learned in this University of Utrecht study was it's very important to start early on in the process because the choices which are made on a script level will have implications in a production, which is obvious but it's important to start early in this thinking process.” (ITW4). A standard package is provided which includes predictive and final footprint calculations, carbon action plans, certification processes, and access to the Albert calculator (ITW4).

The specific regulations for 2025 confirm this incentive-based approach. Article 11 of the Film Activities Sub-Regulations ([NFF, n.d.b](#)) now requires festivals to have a vision and sustainability plan for their organisation and activities, as part of the transition to a climate-neutral and circular future. They are also setting up *Special Contributions* to finance innovative projects in the field of diversity and sustainability. Sustainability is therefore integrated as an objective and good practice, but not as a legal eco-conditionality attached to Fund aid. The current policy relies heavily on carbon footprint measurement through the Albert calculator. Around 30 to 40 productions have already undergone footprint calculations, while additional projects have completed predictive footprint assessments prior to production. According to the interviewee, these tools primarily serve as awareness-raising mechanisms, helping producers better understand the environmental consequences of production choices related to transport, energy use and catering practices (ITW4).

In terms of technology regulations, the Netherlands has restricted the possibility of establishing hyperscale data centres outside designated areas ([Greenberg Taurig, 2024](#); [Scholten et al., 2022](#)). Due to a high concentration of data centres in the area, particularly in the Amsterdam region, certain regions have also imposed their own regulations. In July 2019, the municipality

of Amsterdam and the commune of Haarlemmermeer imposed a temporary moratorium on new installations, before reintroducing stricter installation policies. However, although these regulations have ecological implications, they primarily address issues of space and an overloaded electricity network ([Judge, 2019](#); [Gooding, 2024](#).) However, according to the Dutch Data Centre Association ([Derksen, 2021](#)), new regulations governing the establishment of data centres are moving towards more sustainable data centres.

The Netherlands has also transposed the European EED Directive, which imposes a reporting obligation on data centres. Data centre operators with a capacity of more than 500kW must report information on energy efficiency via the State Service for Enterprising Netherlands (RVO). This obligation complements the EED audit obligation managed by the RVO ([RVO, n.d.](#)). The government has also published a technical guide for energy management in data centres (power management), which compiles operational practices and requirements aligned with the EED objectives ([Harryvan, 2022](#)). These measures are part of an ambitious national climate framework. The 2017 coalition agreement aimed for a 49% reduction in GHG emissions by 2030 (compared to 1990 levels), which has since been raised to 55% and carbon neutrality by 2050 ([VVD, CDA, D66 & CU, 2017](#); [Government of the Netherlands, 2025](#)).

Domestic and international cooperation

The importance of collaborating with all stakeholders across the value chain is emphasised by the interviewees. The NFF, for example, is in close contact with producers, broadcasters, streamers, festivals and distribution companies. One of the main aims of involving these different voices from the industry is to assess sustainability challenges across the entire value chain before developing a more comprehensive sustainability policy (ITW4; [Pan, 2024](#)).

Partnerships with specific organisations are also highlighted. Green Screen, for example, works closely with the NFF and provides sustainability consultancy and eco-management services to supported productions, although producers are free to choose their own eco-manager (ITW4; [Pan, 2024](#)).

At the European level, cooperation is considered essential due to the central role of international co-productions in the Dutch audiovisual sector. The respondent emphasised that productions often involve several countries and are therefore confronted with different sustainability frameworks, funding systems and reporting requirements. They mention a particular collaboration with Flanders, Denmark and Germany, with particular attention to potential cooperation within the Benelux framework. These discussions aim to identify common approaches that could facilitate collaboration while reducing some of the environmental impacts associated with international co-productions, notably through lower travel requirements and more flexible local spending obligations (ITW4).

Policy gaps and challenges

A foundational policy gap in the Dutch audiovisual sector lies in the absence of clear governmental sustainability objectives for the audiovisual sector. The NFF started working on sustainability largely on its own because there were no national targets or ministerial guidelines for the sector. As the respondent puts it, the Fund had to “invent the wheel” itself, which creates uncertainty and makes it harder to introduce more ambitious measures (ITW4). They also emphasise that without a governmental mandate, any new policy is likely to generate criticism or resistance: “The fact that there is no government directive is also an obstacle because the sector would have more backup for potentially more drastic measures. The Netherlands is a country with [...] very vocal people, very outspoken opinions. Whatever is launched as a new policy will also be criticised or there will be resistance. So [sectoral policies] really have to be done in dialogue with the sector, not only with the frontrunners and the younger generation who are very willing to change, but also not forgetting that there will be whole teams which all need to have a higher awareness and a contribution.” (ITW4).

Another challenge concerns the scope of current sustainability policies. The Fund decided to focus first on production because the Utrecht University study identified it as the stage generating the largest share of emissions and because it was the area where action seemed most immediately feasible ([Utrecht University, 2021](#); ITW4). However, the interviewee acknowledges that this creates a certain tunnel vision. Much less is known about the environmental impact of distribution, theatrical exhibition and streaming services, making it difficult to develop targeted measures in these areas. The Fund is therefore collecting additional data across the wider value chain with the aim of building a more holistic sustainability strategy. At the same time, it has no influence over productions financed entirely by platforms such as Netflix or Amazon (ITW4).

Existing carbon measurement tools illustrate some of the difficulties linked to implementation. ITW4 considers carbon calculators useful because they help raise awareness and encourage producers to think differently about issues such as transport, fossil fuel use or catering practices. At the same time, these tools can be seen as a burden. Carbon action plans involve a large number of questions and are often perceived as an additional administrative layer in an already complex production process. The NFF is still evaluating the effectiveness of these instruments and whether they remain the most relevant intervention at every stage of the process. The interviewee also points to a broader challenge linked to the coexistence of different calculators, including Albert, EURECA and the CNC tool: “So there's a jungle of different calculators, and not all of them are really user-friendly. Some are more and some are not, and the algorithms behind them are different. If you know that many productions are international co-productions, that also adds an extra complexity layer into this mix because it means that films can involve 2, 3 or 7 countries. So would you then use seven different calculators for all these pieces of the pie of the financing structure of the film, or do you want to go towards one European standard, which is extremely difficult to reach? This is a little sketch of the reality of

producing in Europe.” (ITW4). As all these calculators rely on different methodologies, they can create difficulties for international co-productions that have to comply with several reporting systems at once (ITW4; [Heidsiek, 2022](#)).

This issue is closely linked to the broader European context. International co-productions are common in the Dutch audiovisual sector, but sustainability requirements remain only partially harmonised across Europe. Different countries operate different funding systems and incentive schemes, including tax shelters, tax rebates, cash rebates and investment obligations. According to the interviewee, these differences sometimes create contradictory incentives. A frequently cited example concerns local spending obligations attached to co-production funding. While sustainability policies encourage reducing travel, co-production mechanisms often require expenditure and activities to take place in each participating country, making additional travel unavoidable (Sørensen & Noonan, 2022).

ITW4 also stresses that sustainability is not only a technical or regulatory issue. Film production is a collective process involving dozens, and sometimes hundreds, of people. Whether sustainability measures succeed often depends on social dynamics within the production team. Resistance can emerge when sustainability is perceived as an obstacle or as interference with established working methods. This is particularly relevant when experienced professionals are asked to change long-standing practices. As a result, eco-managers and sustainability consultants need strong facilitation and communication skills in addition to technical expertise. The challenge is therefore to find the right balance between incentives and obligations. Voluntary measures alone are often insufficient to generate change, but overly restrictive requirements can provoke resistance (ITW4).

Emerging trends and future prospects

Dialogue with the sector is considered essential, not only with frontrunners or younger professionals who are already interested in sustainability, but also with more established industry actors who may be less familiar with these issues (ITW4; Sørensen & Noonan, 2022). In the interviewee’s view, change takes time, and the priority is to encourage people to engage with sustainability rather than simply imposing new requirements. Stronger governmental targets would therefore provide a useful framework and stronger legitimacy for the initiatives developed by the institutions (ITW4).

The interviewee also points to several ongoing trends. Awareness of sustainability issues has increased significantly over the past decade, both within society and within the audiovisual sector. Younger producers and creators are generally described as more receptive to green practices and sustainability policies than previous generations. Looking back, ITW4 suggests that the first sustainability initiatives introduced by the NFF around twelve years ago may simply have come too early. At the same time, a paradox is emerging: awareness of climate issues is growing, but audiences are also becoming increasingly tired of narratives centred on

catastrophe and crisis. Films, documentaries and series are therefore seen as important tools for raising awareness, provided they offer perspectives for action rather than focusing exclusively on negative futures. The Fund recognises the importance of these narratives but remains cautious about intervening directly in creative choices. Instead, it seeks to support scriptwriters and directors through training, awareness-raising activities and knowledge sharing (ITW4).

For this reason, the interviewee sees a clear role for greater European harmonisation. The Fund is already discussing possible agreements with several regular co-production partners, including Flanders, Denmark and Germany, and sees the Benelux as a possible starting point for this type of cooperation (ITW4).

A collective process involving the entire sector is seen as particularly beneficial. Streamers, cinemas, theatres, producers and other stakeholders would be brought together to define common sustainability ambitions and potentially develop a shared charter or manifesto. In this vision, sustainability goals should come from within the sector itself rather than being imposed externally. The role of the Fund would be to support this process and establish a basic framework, while leaving the definition of objectives largely to industry actors. Combined with stronger governmental backing and greater European harmonisation, this is seen as the most promising way forward for the Dutch audiovisual sector (ITW4).

5.7. North Macedonia

Institutional landscape

In the audiovisual sector, the two main institutional actors are the Agency for Audio and Audiovisual Media Services (AVMU), an independent public regulatory body responsible for supervising broadcasters and on-demand audiovisual service providers, monitoring programme quotas, protecting minors, and overseeing ownership transparency ([AVMU, n.d.](#)), and the North Macedonia Film Agency, a governmental body established under the Law on the Film Industry in 2014 as the legal successor of the Macedonian Film Fund. The Agency is responsible for supporting the development, production, distribution, exhibition and promotion of the national film industry, financing projects through an annual competition, and maintaining records of producers, distributors and cinemas. It is a member of the European Film Agency Directors Association (EFAD) since 2019, which provides a channel for engagement with European audiovisual policies ([EFAD, n.d.b](#); ITW18). The Cinematheque of Macedonia, founded in 1974, serves as the national film archive.

Despite these actors, the North Macedonian audiovisual sector remains relatively small compared with other countries. It nonetheless includes a range of production companies, audiovisual professionals and VOD initiatives (see [Section 5.1](#)).

Beyond national institutions, external actors also play an important role in shaping the policy landscape in North Macedonia. European influence is particularly visible through the EU accession process, which continues to shape national policy priorities and reform agendas ([European Commission, 2025a](#); ITW15). International organisations are also present in the field, notably the United Nations, which contributes to capacity building, awareness-raising activities, and the development of mechanisms related to SCT ([UN in North Macedonia, n.d.](#); ITW15).

Political context

Climate change remains a relatively low spontaneous priority among the general public in North Macedonia, despite substantial levels of concern when citizens are directly asked about the issue ([UNICEF, 2022](#)). According to ITW15, many people are already experiencing some of the consequences of climate change, but these challenges are not always recognised as climate-related. He argues that climate change is often perceived as a distant or abstract issue rather than something directly connected to everyday practices and behaviours (ITW15). This is consistent with survey evidence showing that citizens respond more strongly to visible environmental problems and often conflate climate change with air pollution ([UNICEF, 2022](#)). Therefore, awareness of the environmental impact of digital services is particularly limited. The environmental footprint of streaming platforms, data storage and digital consumption is rarely discussed, and more visible environmental concerns, especially air pollution, tend to dominate public debates (ITW15).

Across the interviews, SCT in the context of the audiovisual sector is primarily understood as reducing the environmental footprint of audiovisual production, distribution and content consumption (ITW18; ITW19; ITW20).

Beyond environmental considerations, sustainability is also associated with the long-term resilience of cultural and creative organisations. Respondents referred to cultural, economic and digital sustainability, highlighting the need to ensure that organisations, creators and independent initiatives can remain active over time (ITW19; ITW20).

Instruments and their reception

As a candidate country to become a member of the EU since 2005, North Macedonia has an obligation to bring its legislation into line with EU law. The European Commission's 2025 report highlights the ongoing efforts to harmonise Macedonian environmental law with that of the EU ([European Commission, 2025a](#)). One interviewee noted that many of the priorities associated with the SDGs overlap with those of the EU accession process, making sustainability-related concerns relatively visible within policy documents and strategic frameworks (ITW15).

In North Macedonia, the environment is governed by the Law on the Environment. This Act establishes (i) the Environmental Impact Assessment (EIA) system; (ii) integrated environmental permitting (A/B permits) for polluting installations; (iii) national and local environmental planning; and (iv) the competences of the Ministry of Environment and Physical

Planning (MOEPP). Among these, A/B environmental permits are particularly important because the facilities to which they are awarded contribute a large share of emissions. They must therefore follow the siting, emission controls and monitoring requirements ([Ministry of Environment and Physical Planning, 2005](#)).

The country's climate targets are also set out in this law and are aligned with the EU's targets to reduce GHG emissions by 55% by 2030. To this end, they aim in particular to integrate climate objectives into sectoral policies. A climate law has been discussed and is sometimes cited, but for the moment no consolidated text exists ([Ministry of Environment and Physical Planning, 2005](#); [IPF7 Consortium, n.d.](#))

The law that governs the audiovisual sector is the Law on Audio and Audiovisual Media Services²¹, adopted in 2013. This law defines the rights and obligations of broadcasters, audiovisual media-on-demand providers, and electronic-communications operators. It sets the legal basis for the operation and supervision of audiovisual media services. It has been amended several times, notably in 2019, an amendment that partially transposes the DSSA ([European Audiovisual Observatory, 2023b](#), [Republic of North Macedonia, 2013](#)). However, this text does not include a sustainability dimension, and the agency in charge of the audiovisual sector does not put eco-conditionality to its funds. The interviewees confirmed the absence of legislation specifically addressing the SCT of the audiovisual or VOD sectors. Similarly, no respondent identified sustainability criteria, environmental bonuses, or ecologically sustainable production requirements within the funding mechanisms of the North Macedonia Film Agency (ITW18; ITW19; ITW20).

At the organisation's level, sustainability measures remain limited and largely voluntary. Respondents mentioned using remote collaboration tools and online meetings to reduce travel, adopting digital workflows and cloud-based documentation to limit paper consumption, and, in some cases, efforts to reduce waste and single-use plastics during production activities (ITW18; ITW19; ITW20). While these initiatives indicate a growing awareness of sustainability issues, interviewees did not report the existence of formal sustainability frameworks or coordinated sector-wide measures within the audiovisual industry.

Participation in European cooperation projects was identified as one of the main drivers of sustainability awareness within the sector. In particular, involvement in programmes such as Horizon Europe has contributed to discussions around the environmental footprint of content production, streaming services and digital distribution models ([PMCG, 2023](#); [European Commission, 2025a](#); ITW19).

Domestic and international cooperation

At the national level, collaboration between actors appears to be common due to the small size of the audiovisual ecosystem (see [Section 5.1](#)). One respondent noted that cooperation

²¹ Law on Audio and Audiovisual Media Services. ([2013](#)). Official Journal of the Republic of Macedonia, No. 184, 26 December 2013.

between organisations, institutions and professionals is almost unavoidable in such a context (ITW20). However, environmental sustainability does not currently seem to constitute a structured area of cooperation. According to ITW18, environmental standards are not the subject of formal dialogue between producers, broadcasters and regulators in the North Macedonian market (ITW18).

At the same time, several respondents stressed the importance of strengthening exchanges between public institutions, cultural operators and audiovisual professionals in order to develop sustainability policies and standards that reflect the realities of the sector (ITW18; ITW20). The integration of sustainability concerns into discussions with national organisations was also described as a way to raise awareness among actors who would otherwise have limited exposure to these issues. Nevertheless, approaches to climate-related issues vary considerably across sectors, with cultural organisations, media outlets and NGOs often addressing these topics in different ways and with different levels of engagement (ITW15).

International collaboration appears to play a much more significant role in the diffusion of sustainability-related practices. European co-production partners were identified as one of the main channels through which North Macedonian producers encounter environmental standards and sustainability requirements. Even in the absence of national eco-conditionality measures, participation in European projects or international co-productions often requires organisations to take sustainability considerations into account ([Eurimages, n.d.](#); ITW18). As a result, several interviewees perceive international partnerships as one of the main channels through which sustainability-related practices and environmental standards reach the North Macedonian audiovisual sector (ITW18). These external collaborations may not be bound to co-production but can also involve festivals, educational institutions, distributors and audiovisual professionals from other European countries (ITW20).

International organisations also contribute to awareness-raising, capacity building and the development of SCT-related mechanisms (ITW15). In addition, European and international funding opportunities were repeatedly described as essential to the survival of many cultural and media organisations in the country (ITW15; [EFAD, n.d.b](#)). Given this dependence on external funding, sustainability requirements attached to international programmes may indirectly influence organisational practices and priorities.

Several respondents referred to their participation in European initiatives and funding schemes, such as Creative Europe, identified as an important actor in promoting sustainability within the audiovisual sector. Respondents described the programme as a key channel for disseminating sustainability-related priorities and expectations across Europe ([European Commission, n.d.a](#); ITW18; ITW19; ITW20). It can facilitate knowledge exchange, discussions about the sector's future, and the circulation of new sustainability-related practices (ITW19; ITW20). The UN SDGs were also mentioned as an important reference framework for a range of European and international projects (ITW19; ITW20; [UN, n.d.](#)). One respondent emphasised that the SDGs

should be understood as an interconnected framework, where progress in one area is often linked to developments in others, rather than as a series of isolated objectives (ITW15).

Policy gaps and challenges

The interviews reveal a significant gap between policy development and policy implementation. While sustainability concerns are increasingly integrated into policy frameworks, notably through EU accession requirements and SDG-related objectives, respondents stressed that policy commitments rarely translate into effective implementation on the ground. As one interviewee explained: “The SDGs are quite well integrated within the policies. [...] But the development of the policy and the implementation of the policies are quite different in the country, which means that there might be a policy for something, but it is not implemented. Having integration of SDGs within the policies does not mean that there is actually something happening on the ground.” (ITW15). Existing control and enforcement mechanisms were described as weak, limiting the practical impact of these commitments ([European Commission, 2024b](#); ITW15; ITW20). This gap is particularly visible in the audiovisual sector, where interviewees identified the absence of a dedicated sustainability framework. Respondents reported that there are currently no sustainability criteria within public audiovisual funding schemes, no environmental bonuses for sustainable productions, no specialised training programmes, no fiscal incentives linked to environmental performance, and no sustainability-specific measures targeting the VOD sector (ITW18; ITW19; ITW20). Digital infrastructures, data centres and the energy consumption associated with streaming services were also described as receiving limited attention within existing policy frameworks (ITW15).

Several respondents nevertheless argued that the challenge is not limited to regulation alone. Sustainability was repeatedly described as a question of resources and market structure. The North Macedonian audiovisual sector was characterised as a small market operating under significant financial constraints, with organisations often prioritising economic survival over sustainability investments and relying heavily on international funding opportunities (ITW15; ITW18; ITW20). One respondent noted that this situation extends beyond North Macedonia, as audiovisual sectors across the Western Balkans remain more concerned with establishing stable funding mechanisms than with incorporating environmental sustainability considerations into them (ITW18). Similar constraints were identified in the VOD sector, including market saturation, competition from major international platforms, localisation and dubbing costs, inflation, piracy and limited consumer willingness to pay for content (ITW19). In this context, sustainability measures were generally considered necessary, but interviewees stressed that they should remain proportionate to the capacities of small organisations and reflect the realities of smaller markets (ITW18; ITW19; ITW20). As one respondent explained: “Implementation still varies a lot depending on the size of the organisation and the market conditions. Larger industries adapt faster because they have more resources and specialised expertise. Smaller organisations often need additional support, guidance, and flexibility. [...]”

Incentives work best when they are combined with education, practical tools, and realistic implementation expectations.” (ITW20)

Technical and operational limitations further complicate the transition. Carbon measurement tools are not widely used and are often perceived as poorly adapted to small markets and productions (ITW18; ITW20). Respondents also referred to a lack of specialised expertise, practical tools and support mechanisms. While European frameworks were generally viewed positively, sustainability requirements attached to European programmes and the SDGs were sometimes described as too vague or abstract to directly influence day-to-day practices (ITW18). ITW18 explains that: “Producers in small markets need practical knowledge not another policy document, but actual training on how to green a production within a limited budget. [...] [There is a need for] standards that work across borders, because co-production is how most European films get made. If every country has different green requirements, it becomes a nightmare. Harmonisation at EU level is essential.” (ITW18).

Interviewees also pointed to an overlooked dimension of current sustainability debates: the role of content itself. In their view, discussions largely focus on production processes, while paying insufficient attention to storytelling and the capacity of audiovisual works to shape values, behaviours and public perceptions (ITW18; ITW20).

Beyond institutional and economic barriers, respondents highlighted challenges linked to public awareness and social perceptions. Climate-related issues were described as receiving limited attention among the wider public, while awareness of the environmental impact of digital technologies and streaming services remains particularly low ([UNICEF, 2022](#); ITW15). Low levels of media and environmental literacy, deeply rooted social norms and the perception that sustainability is primarily a Western European concern were all identified as barriers to behavioural change (ITW15; ITW18; ITW19).

Emerging trends and future prospects

Despite the previously mentioned challenges, several encouraging developments were identified. Sustainability considerations are becoming increasingly visible within European programmes and funding schemes, while international co-productions and European projects were described as important channels through which North Macedonian organisations are exposed to environmental standards and sustainability-related discussions (ITW18; ITW19; ITW20). Emerging debates on streaming infrastructures, data storage and digital energy efficiency, as well as the appearance of environmental labels in parts of the Balkans, were also mentioned, although these developments remain at an early stage (ITW15; ITW19; ITW20). Across all interviews, financial incentives were consistently identified as one of the most effective instruments for encouraging behavioural change and organisational adaptation (ITW15; ITW18; ITW19; ITW20).

Interviewees proposed several avenues for addressing these challenges. Suggestions included integrating sustainability considerations at the design stage of policies and technologies, developing policy approaches grounded in behavioural analysis, creating green certification systems adapted to small productions, introducing environmental requirements into audiovisual funding schemes, and providing financial support to facilitate compliance (ITW15; ITW18). Dedicated funding schemes for low-carbon productions, fiscal incentives, support for energy-efficient digital infrastructures, media literacy programmes, education initiatives, practical tools and more sustainable distribution models were also identified as priorities (ITW19; ITW20). “The sector needs investment and collaboration around three areas. Research is needed and also technology for greener streaming and storage, including tools that small platforms can actually afford to use. Then, training and upskilling so that producers, distributors and platform managers understand both the technical and editorial aspects of sustainability. Lastly, [...] more harmonised green standards and transparency obligations for large infrastructure providers, such as data centres and CDNs, so that [smaller platforms] can make informed choices about the environmental impact of the services they depend on.” (ITW19). Across the interviews, respondents emphasised that sustainability should be framed not only as a regulatory obligation but also as an opportunity for resilience, innovation and long-term sectoral development (ITW20).

5.8. Poland

Institutional landscape

The Polish audiovisual landscape is governed by a centralised statutory hierarchy, structured around key regulatory authorities and professional stakeholders. At the top of this framework, the Ministry of Culture and National Heritage holds primary responsibility for the allocation of budgets and the establishment of legislation (Wantoch-Rekowski & Czarnecki, 2024). Operating directly under the Ministry’s tutelage, the Polish Film Institute (PISF), created in 2005 through the Law on Cinematography²², manages the regulation of the film sector and the attribution of subsidies to producers ([PISF, n.d.](#)). This national administrative structure is complemented by a network of 10 regional film institutions and regional centres, notably in major hubs such as Łódź, Warsaw or Poznań ([KIPA, 2023a](#); [SFP, n.d.](#)). Among them, the Łódź Film Fund, created in 2007, stands as one of the largest regional film financiers in Poland, supporting film co-productions in partnership with EC1 Łódź, a multi-functional cultural institution established by the City Hall and co-financed by the Ministry of Culture ([CineRegio, n.d.](#)). The fund itself is operated by the Łódź Film Commission, which is dedicated to assisting audiovisual professionals throughout the region (ITW7; [CineRegio, n.d.](#)). In parallel to these state and local authorities, the industry is supported by the Polish Producers Alliance (KIPA). As a highly influential professional association, KIPA serves as a key intermediary and advocates for the

²² Ustawa z dnia [30 czerwca 2005](#) r. o kinematografii.

economic and normative interests of the professional sector, and conveys industry demands to the relevant authorities ([KIPA, n.d.](#)).

Political context

Poland does not have a national climate law or a carbon-neutral strategy, but it complies with its European obligations through the European Climate Law ([Widuto, 2024](#)). It has therefore submitted its National Energy and Climate Plan (NECP), which was updated in March 2024. However, this political framework exists alongside relatively low public urgency regarding environmental issues. According to a 2023 Eurobarometer survey, only 7% of Polish respondents consider climate change to be the single most serious problem facing humanity, compared to an EU average of 17%. Climate change ranks fourth behind armed conflict (37%), poverty, hunger, and a lack of clean water (13%), and the economic situation (9%) ([European Commission, 2023](#)).

Despite this wider societal context, the audiovisual sector has seen significant progress: following strong mobilisation by industry professionals and regional film funds, funding criteria have been adapted to integrate environmental sustainability. Nevertheless, policymakers note that greater inter-institutional coordination remains necessary to fully optimise these efforts (ITW7).

Instruments and their reception

In Poland, a tangible movement toward greater sustainability in filmmaking is currently underway, characterised by a multidimensional strategy. It is characterised first, by a cross-sectoral initiative and KIPA's advocacy. Second, the regional funds are also promoting training and good practices at the subnational level. Lastly, the country is engaged in several international projects under European funding, including both professional and regional organisations. Together, these efforts are creating a structural framework designed to integrate sustainable practices into the core of the Polish audiovisual industry (Kopeć & Materska-Samek, 2023).

First, the Polish industry's commitment to sustainability is anchored by a significant cross-sectoral initiative known as "Film dla Klimatu" (Film for Climate). Established in December 2020, this grassroots, informal alliance bridges the gap between private and public entities. It unites a diverse array of stakeholders such as KIPA, the Advertising Producers Club, the Audiovisual Technology Centre, and numerous regional film commissions. This bottom-up coalition serves as a collaborative platform for representatives across the entire audiovisual value chain (Kopeć et al., 2024). The collective first presented its demands at the Polish Feature Film Festival of Gdynia in September 2021, through a manifesto calling for greater consideration of sustainable practices in the audiovisual industry ([KIPA, 2021b](#); [KIPA, 2021a](#)). Beyond advocacy, Film for Climate also issued two biennial reports on initiatives to promote sustainable actions ([KIPA, 2023b](#)), such as a "Green Filming" guide listing best practices and principles of environmentally sustainable filming in Europe ([Łódź Film Commission, n.d.c](#)).

Parallel to this coalition, KIPA has leveraged its established position in the sector to organise various events and conferences focused on knowledge sharing and has lobbied the government and its representative institutions (ITW7). Since 2020, KIPA has organised seminars with international organisations like the European Centre for Sustainability in the Media World, and recently partnered with Netflix and the Ministry of Culture to deliver training on the Green Film certification ([KIPA, 2020](#); [KIPA, 2021c](#); [KIPA, 2025b](#)). In addition to seminars, to align the domestic workforce with the EU's 2050 carbon neutrality targets, KIPA established a specialised certification program in 2022. Supported by the PISF, KIPA also organises a certification for eco-consultants and sustainable audiovisual production ambassadors. To obtain this certification, the candidates must follow the webinars "Laboratory of Green Audiovisual Production 2023". The main difference between eco-consultants and GAPA is that eco-consultants have additional practical workshops ([KIPA, 2022b](#)). The objective of this formation is to develop ecological and environmental sustainability knowledge and know-how in Poland to better align with European regulations for carbon neutrality in 2050. The first edition in 2022 was supported by the European Commission representation ([KIPA, 2022b](#)). In 2023, this formation was supported by PISF, and 10 eco-consultants and 11 green audiovisual ambassadors were formed ([KIPA, 2023c](#)). These systems are complemented by the awarding of a prize. A Climate Film Prize has been awarded each year at the Polish Feature Festival in Gdynia since 2022. This award seeks to highlight the productions willing to act for the climate and use ecological methods in all phases of the project ([KIPA, 2025a](#)). In 2022, this award was awarded with the collaboration of Electrolux, the official partner of the Festival of Gdynia, as well as the European Commission, in line with the Green Deal initiatives ([KIPA, 2022c](#); [KIPA, 2022a](#)). In 2025, this award was organised in coordination with the Ministry of Culture and KIPA ([KIPA, 2025a](#)).

In October 2024, a major structural milestone was achieved through state regulation. The Minister of Culture and National Heritage amended the list of eligible costs available for financial support from the PISF. In this law, which was put into force on November 27, 2024, point 9 "sustainable audiovisual production" was added ([Portal Samorządowy, 2024](#)). Under this new legal framework, producers can now claim state reimbursement for specific green costs, including: the implementation of a sustainable plan; buying and using a carbon calculator license; different ecological processes and habits during all the phases of the production leading to the reduction of waste; use of clean energy and procurement of environmentally sustainable materials; contracting environmental specialists²³. This amendment was adopted after a long campaign led by KIPA and ŁFC among industry professionals, interrogating their needs via a survey conducted in 2021, as well as the input from PISF ([KIPA, 2022e](#); [KIPA, 2021d](#); Kopeć & Materska-Samek, 2023).

²³ Rozporządzenie Ministra Kultury i Dziedzictwa Narodowego z dnia [30 października 2024](#) r. zmieniające rozporządzenie w sprawie szczegółowego wykazu polskich kosztów kwalifikowalnych, parametrów utworów audiowizualnych oraz dokumentów związanych z przyznawaniem wsparcia finansowego na produkcję audiowizualną przez Polski Instytut Sztuki Filmowej. Czytaj więcej w Systemie Informacji Prawnej.

While this amendment represents a critical legislative shift, industry experts note that it is still a voluntary commitment and does not yet place ecological considerations at the centre of the system. This is still an additional thought to be given by the production team (ITW7). This voluntary approach was further visible when PISF and KIPA also presented KlimAktiv, a certification developed by a German non-profit in April 2024, while not rendering its use mandatory ([KIPA, 2024](#)).

Aside from professional advocacy, at the subnational level, regional film commissions act as primary laboratories for green implementation. First of all, in early 2023, the Wroclaw film foundation requested PISF funding to develop an environmental sustainability knowledge portal in order to share common knowledge and best practices. In Krakow, filmmakers can reduce their mandatory regional spending requirement from 150% to 130%, provided the remaining 20% is allocated directly to verified "green costs" (environmentally sustainable expenses) ([KIPA, 2023b](#)). Nevertheless, the ŁFC remains the pioneer of sustainable policy in Poland (ITW5). Łódź was the first domestic fund to incorporate conditional scoring into its subsidy allocation, granting bonus points to applicants who present a structured sustainability plan (Kopeć & Materska-Samek, 2023). The measure is not binding, but it opens the door to sustainable production (ITW7).

To reinforce this regulatory scoring, the region provides concrete financial and logistical backing. Since 2020, film producers have been able to cover environmentally related expenses incurred at the regional level through the co-production support scheme of the EC1 Łódź institution (Kopeć et al., 2024). Specifically, the ŁFC adapted its financing criteria to incorporate five points dedicated to evaluating a project's impact on sustainable development. In the case of co-productions, the EC1 cultural centre directly subsidises 25% of an eco-coordinator's remuneration, while granting all supported films free access to the Albert carbon calculator ([KIPA, 2023b](#)). Furthermore, the Commission hosts a voluntary, free-access database of certified eco-suppliers on its website, alongside specialised environmentally sustainable production guides and KIPA's foundational research on the matter ([Łódź Film Commission, n.d.a](#)). This comprehensive incentive framework has been highly well-received, yielding significant industry engagement: out of 44 total sustainable applications received, the fund backed 8 projects in 2023, 19 in 2024, and 17 in 2025 (ITW7).

Lastly, on an international level, the Polish sector has integrated into cross-border networks to foster regional development. Between 2020 and 2023, Poland participated in the Interreg GreenFilmTourism, developed under the European Regional Development Fund (ERDF) alongside Slovakia, destined to promote and develop the film heritage of the region at the border between those two countries. It is targeted towards the promotion of a sustainable use of the natural and cultural resources of this region, and developed outputs such as a knowledge portal including a database, a cross-border film heritage trail and ecological solutions for film production. In 2022, a guide highlighting solutions for better sustainability in film productions was also created, with the collaboration of KIPA ([KIPA, 2022d](#)). This project has been developed

under the scope of economic development, as the Regional Development Agency of Bielsko-Biala is the leading partner, but it also includes film commissions of different regions in Poland and Slovakia, for example, the SubCarpathes Film Commission ([Green Film Tourism, n.d.](#)). Poland is also a part of the Green Screen Initiative, as the Rzeszów Regional Development Agency is one of the offices of the project (Kopeć & Marta Materska-Samek, 2023). Łódź Film Commission, KIPA, Mazovia Warsaw Film Commission and the Subcarpathia Film Commission also take part in the promotion of the activities made by the initiative in Poland ([Łódź Film Commission, n.d.c](#)).

Domestic and international cooperation

As demonstrated, at the local level, significant horizontal collaboration exists between KIPA, regional film commissions, and the PISF. This collective capacity is demonstrated by their common involvement in the Film dla Klimatu alliance, where public and private stakeholders develop strategic tools, such as the biennial initiative reports and the "Green Filming" guide (Kopeć et al., 2024; [Łódź Film Commission, n.d.b](#)).

Furthermore, the professional mobility of individuals between these professional associations, regional funds, and the national institute plays a vital role in accelerating the sharing of practical knowledge across the industry (ITW7). Rather than working in isolation, these moving stakeholders ensure that local experiences directly inform national strategies: "together we tried to push the government or the institutions representing the government, some such as Polish Film Institute, to implement also some solutions in general, to start creating the system for green production" (ITW7). A notable example of this dynamic is the creation of the PISF legislative amendment in late 2024. This state-level reform was directly prepared by the joint surveys and research conducted in 2021 by KIPA and the ŁFC, which shows how regional field experience directly shapes national regulations ([KIPA, 2022e](#); [KIPA, 2021d](#)).

At the international stage, Polish actors further this collaborative dynamic by leveraging cross-border partnerships to import and co-developing sustainability tools. In the Interreg GreenFilmTourism project alongside Slovakia, this led to the creation of a joint sustainable production guide (Kopeć & Materska-Samek, 2023; [KIPA, 2022d](#)). Furthermore, the Polish sector relies on transnational academic knowledge exchange, as seen when KIPA and the PISF introduced the KlimAktiv certification or when local experts attended foundational environmentally sustainable training sessions developed by a German university ([KIPA, 2024](#); ITW7).

Policy gaps and challenges

Sustainability within the Polish audiovisual sector is now emerging as a multidimensional necessity, covering the circular economy and green technologies, but also a thorough reflection on audience and distribution. This transition is taking place on two complementary levels: an operational level, aimed at improving energy efficiency, and a systemic level, marked by the

emergence of support funds and coordinated policies. According to ITW7, the increasing influence of VOD platforms is a key driver of this transformation: they have an increasing weight in content production and co-production, exceeding that of the traditional private sector, which gives them a decision-making role in shaping production policies. Furthermore, the role of the EU is highlighted: several directives have acted as the main catalyst and forced the integration of the issue onto the national agenda (ITW7; Kopeć & Materska-Samek, 2023)

Despite these international and market-driven pressures, the major challenge within the domestic ecosystem is the passive state of national policies: "I think that we are in such a situation as a country that this is also not a crucial point right now because the safety nets it's the most important. So I don't think that the eye of the government will go to this topic." (ITW7). Consequently, in the absence of centralised political will, the Polish transition relies on a bottom-up dynamic, driven by regional funds, the KIPA, and private production companies (Kopeć & Materska-Samek, 2023; ITW7). As one interviewee summarised, "So I think there is a need to change the algorithm, which is implemented within the VOD systems, but I think it will never happen right now, at the moment, because it's all about capitalism, I think " (ITW7).

Emerging trends and future prospects

To resolve this strategic vacuum, transforming the sector requires comprehensive, systemic action, from education to regulation. Education is the essential foundation: investing in skills development through initiatives like the Green Filming Academy or acceleration programmes dedicated to sustainable production is crucial (Kopeć & Materska-Samek, 2023). The implementation of standards, such as the Austrian Evergreen Prisma system, must be supported by the Ministry to create a network of certified managers. Simultaneously, a transition to hard law is necessary: the PISF and regional bodies must develop binding guidelines, accompanied by financial incentives, systems for reimbursing green expenses, and recognition through labels or festival support (ITW7). Finally, the regulatory framework should address the role of global VOD platforms, where the focus should primarily be on the technical aspects: reducing carbon emissions and increasing transparency regarding consumption data. Therefore, closer collaboration between the PISF, KIPA, and VOD operators is necessary to establish green protocols, with the platforms eventually contributing financially to sustainable solutions (ITW7).

5.9. Romania

Institutional landscape

The regulatory and organisational landscape of the Romanian audiovisual and VOD sector is structured around several primary institutions. At the legislative top, the Ministry of Culture is responsible for establishing overarching policy directions, enacting normative frameworks, and allocating budgets ([Ministerul Culturii, n.d.](#)). Under its authority, the National Cinema Centre (CNC-R) acts as the central body for the regulation and organisation of film production. Its

missions include fostering industry development and promoting national works; it provides various grants and subsidies across the entire value chain, covering development, production, distribution, and film festivals ([Centrul National al Cinematografiei, n.d.](#)).

Complementing this governance of the cinema, the National Audiovisual Council (CNA) acts as a public authority mandated to safeguard the public interest by maintaining a balanced audiovisual environment that guarantees freedom of expression ([Consiliul Național al Audiovizualului, 2025](#)). In the streaming sector, the CNA interacts directly with streaming platforms, as it is responsible for enforcing the DSA regarding European content quotas (ITW13). Although the CNA is an independent body, it lacks legislative initiative, operating strictly within the legal parameters set by Parliament, though it retains the capacity to develop frameworks or secondary legislation within those legal limits (ITW13).

These institutional mandates operate within a domestic landscape classified by the EU as a zone of "low audiovisual capacity." This vulnerability was severely exacerbated by the COVID-19 pandemic. In 2023, it occupied third place as a country with the lowest government expenditure on cultural services, broadcasting and publishing services ([Eurostat, n.d.](#)). This underfunding is illustrated by a sharp budget asymmetry; in 2024, the total budget for Romanian cinema was 45 million lei (approximately 9 million euros), a figure notably lower than the 48 million lei subsidy allocated solely to the National Theatre of Bucharest ([Vulcan, 2021](#)). Consequently, while an amendment to the 2005 Cinema Law was adopted in 2024 to modernise the criteria for obtaining subsidies ([Film New Europe, 2024](#)), the long-term effects of these changes remain to be seen.

Political context

Regarding the national political framework for the climate transition, Romania has adopted an Integrated National Energy and Climate Plan (PNIESC/NECP) covering the 2021-2030 period, in line with EU-wide energy and climate governance obligations ([Ministerul Energiei, 2025](#)). The updated version of this plan, published by the European Commission in October 2024, sets out targets including an 85% reduction in net GHG emissions by 2030 compared to 1990 levels and climate neutrality by 2045 ([Ministerul Energiei, 2025](#)). However, this framework remains a cross-sectoral energy and climate instrument; no dedicated legislation addressing the climate transition of the audiovisual or VOD sectors specifically has been adopted at the national level. This lack of policy instruments reflects a broader societal context in which environmental concerns have struggled to gain attention. Indeed, public opinion data from 2023 indicates that only 6% of the respondents identified climate change as the number one problem in the world, which is lower than the EU average (17%). The three major issues identified were armed conflicts (18%), the economic situation (16%) and poverty, hunger and lack of drinking water ([European Commission, 2023](#)).

This low-level of attention cannot be dissociated from the broader political context in which Romanian cultural and audiovisual policy currently operates. In December 2024, Romania's Constitutional Court annulled the first round of the presidential election after uncovering evidence of foreign interference, including a large-scale disinformation campaign conducted through social media platforms in support of a far-right candidate ([Lovi, 2025](#)), triggering domestic polarisation, mass protests, and a re-run election in May 2025. This episode, together with Romania's broader pattern of political instability, where changes in government routinely reshuffle governance teams and strategic priorities ([Calus, 2026](#)), has put a particular emphasis on disinformation and transparency issues, while poor inter-institutional coordination has also disrupted decarbonisation efforts elsewhere in the country, notably contributing to the suspension of part of the National Resilience Plan's funding (ITW13; [Maki et al., 2026](#); [Cucu, 2025](#)).

Instruments and their reception

In Romania, the regulation of sustainability in the VOD and audiovisual sectors is still in its early stages, characterised by a stark divergence between state-level institutional passivity and externally driven compliance. The topic was primarily addressed by European institutions, and this is what is driving Romania's progress.

So far, public film authorities in Romania have shown limited institutional engagement in fostering a transition toward more responsible behaviours. Specific measures addressing climate change are yet to be integrated into the AV sector's key mechanisms: neither the CNC-R's cultural support schemes (cinema) nor the 30% national cash rebate (television) currently incorporate environmental criteria ([ADRBI, 2021](#); [StepUp, 2026](#)). In addition, no official national green production label or certification had been established in the country as of July 2026 ([StepUp, 2026](#)). This regulatory vacuum is structurally mirrored within the CNA. While council members recognise the systemic necessity for a comprehensive ecologically sustainable strategy, the institution operates within a fragmented legal framework, paralysed by its own statutory limitations. Because environmental protection is absent from its founding legal statutes, the CNA legally lacks the authority to self-initiate sustainability regulations, significantly restricting its scope of actions: "They as authority do not have the right of legislative initiative, which means that the audiovisual law is made by the parliament. [...] So they are very limited to what they can do. This is why mainly they cannot have more actions regarding this." (ITW13).

Consequently, the EU acts as the primary surrogate driver for sustainability within the Romanian audiovisual ecosystem, operating through regional development funds, co-production mandates, and direct institutional grants. A notable example is the participation of the Bucharest-Ilfov Regional Development Agency (ADRBI) in the "Green Screen" project. This initiative was prioritised by the agency, partially funded by the EU, as part of its development strategy (Priority 3). The project concluded with the publication of a best-practice guide for the

industry, outlining voluntary measures for sustainable production. This guide outlines several key arguments for why companies across the audiovisual value chain should invest in sustainable practices despite the current absence of binding regulations: first, to mitigate their direct environmental impact; second, due to the potential for long-term cost savings; and third, to increase the sector's attractiveness, thereby drawing in new, environmentally-conscious companies and contractors ([ADRBI, 2021](#)). This guide seeks, eventually, to contribute to the evolution of practices in Romania leading to the development of public policies in the sector ([ADRBI, 2021](#)).

Furthermore, because Romanian independent producers are highly dependent on international co-productions and foreign funds, they are increasingly compelled to adopt eco-friendly protocols by trans-European funds like Eurimages, which systematically incorporates environmental requirements into its strict subsidy allocation criteria ([Eurimages, 2025](#)). The influence of the EU on the Romanian audiovisual sector is also significantly amplified through the Creative Europe program and its local office. The MEDIA sub-programme acts as a major lever, offering grants that explicitly support initiatives geared toward a SCT. For instance, within the Business Cluster framework, the "Talents & Skills" call provides a mechanism for funding the industry's sustainable transition by supporting the training of green consultants and the development of sustainability plans, which include the integration and use of carbon measurement tools. Similar opportunities for fostering sustainable practices are reportedly available through the "MEDIA 360" call ([Europa Creativă România, n.d.](#)).

Beyond institutional frameworks, a growing segment of the Romanian industry is demonstrating a proactive commitment to sustainability. Several production companies have begun to integrate ecological standards into their operations, a notable example being DeFilm, which was awarded the Green Film award in 2024 for its production "Milk Teeth" ([BucurestiFM, 2024](#)). This commitment also extends to the festival circuit, where the Transylvania International Film Festival (TIFF) has implemented pragmatic sustainability initiatives since 2019, including the "EcoTIFF" category, which highlights environmental themes in cinematic content. This reflects a broader trend of environmental awareness in Romanian film culture, previously exemplified by the Pelicam Festival in Tulcea, which between 2012 and 2021 dedicated its programming exclusively to environmental issues ([Pelicam Film Festival, n.d.](#)). The Green Tech & Film Festival, organised by the private company Media Image Factory, was held between 2017 and 2024 in Bucharest. It held workshops and screenings of documentaries about ecology and technology in a broad scope ([GreenTechFilmFestival, n.d.](#)), and was named Romania's first carbon neutral festival ([StepUp, 2026](#)). Simultaneously, VOD platforms operating in Romania, such as VOYO (CME), United Group, and Vodafone, are increasingly aligning their operations with the European CSRD. These companies have begun transparently reporting their carbon emissions across scopes 1, 2, and 3, with entities like CME and Accedo having already achieved sustainability certifications in recognition of their efforts ([Vodafone, 2026](#); [UnitedGroup, 2022](#); [CME, 2025](#)).

Domestic and international cooperation

In Romania, institutional collaboration regarding sustainability is divided, driven almost exclusively by international engagement while remaining static and bureaucratic at the domestic level ([Maki et al., 2026](#)). Transnational networks and European organisations act as the primary catalysts for pushing environmental agendas forward, serving as the exclusive spaces where Romanian representatives engage with ecological policy (ITW13). Consequently, environmental issues are predominantly addressed and contextualised within external frameworks such as the Interreg Green Screen initiative, the EFAD, and the European Film Commissions Network (EUFCN).

In sharp contrast to this active international integration, cooperation between domestic public media and audiovisual entities remains strictly traditional, administrative, and structurally siloed ([Expert Forum, 2024](#)). This institutional fragmentation was starkly highlighted during the 2024 political crisis: while DSA provided mechanisms against foreign interference via internet platforms, the lack of coordination among domestic agencies hindered their effective implementation ([Expert Forum, 2024](#)). In the case of the relationship between the CNA and the CNC-R, it is functionally confined to mandatory, non-environmental regulatory obligations (ITW13). Currently, their institutional interactions centre almost entirely on technical tasks, specifically the gathering and submission of data concerning VOD platforms to the MAVISE database, which is managed by the European Audiovisual Observatory (ITW13). While this specific workflow provides a functional channel for inter-agency data exchange, it excludes the ecological dimension by design. Consequently, the integration of sustainability concerns into these national institutional partnerships remains entirely absent, leaving cross-agency sustainable collaboration as a remote goal for the future.

Policy gaps and challenges

The governance of VOD in Romania remains underdeveloped, as policymakers currently prioritise more immediate societal concerns such as disinformation, specifically after the disinformation crisis of the 2024 election ([Vacariu, 2025](#)) and the protection of minors, over environmental goals (ITW13). The expansion of VOD is broadly viewed as positive by the experts, valued for its ability to diversify information sources in a media landscape that was previously constrained by the European Convention on Transfrontier Television. By providing access to a wider array of content and topics, VOD is seen as a tool for fostering pluralism. In this context, environmental issues are currently framed through the lens of content diversity, with the assumption that the diversity of information offered by platforms could potentially encourage users to adopt sustainable behaviours (ITW13).

The recent shift toward regulating these platforms is widely acknowledged as a direct consequence of EU directives, specifically the DSA. However, since environmental sustainability was not a prominent issue during the 2018 revisions of the DSA, there is a strong expectation from a Romanian policymaker that this will be integrated into future amendments (ITW13).

There is significant institutional confidence that the EU will ultimately drive this change through legislative instruments. Conversely, it is considered unlikely that environmental sustainability will be addressed domestically through media regulators in the near term. Because sustainability is not viewed as being intrinsically tied to the core mandate of audiovisual regulation, any such requirements would likely need to be mandated through primary legislation rather than through regulatory action. This situation is further complicated by a notable deficit of data and information regarding the impact of platforms and digitalisation within Romania, which hinders more targeted policy development.

Beyond regulatory mismatch, the path toward sustainable regulation in Romania faces significant structural challenges, most notably chronic political instability and lack of administrative capacity. Each change in government frequently leads to a "clean slate" approach, where governance teams and strategic priorities are radically altered. This lack of continuity makes it nearly impossible to establish long-term objectives or drive lasting change within the sector. This issue is also highlighted in the implementation of decarbonisation strategies at the national level: poor inter-institutional coordination and unpredictable legislative frameworks have caused a suspension of a part of the National Resilience Plan funding ([Maki et al., 2026](#)). Furthermore, regulatory bodies are compelled to strictly follow the political agenda of the current administration, which severely restricts their autonomy and operational capacity (ITW13).

Emerging trends and future prospects

Despite these challenges, according to one interviewee (ITW13), the production phase would remain the most effective leverage point for change. Given that a primary concern for the sector is the diversity of information presented to citizens, platforms are seen as having a crucial role in shaping content. Additionally, transparency efforts are increasingly centred on a "follow the money" principle, a framework that has gained heightened importance due to sanctions against Russia since 2022. This approach seeks to track not only the ownership of a work but the origin of the financial flows funding it: "So first and the most important for the sustainability policy is to know where the money came from first. It's in my opinion the most important thing" (ITW13).

International programmes like Creative Europe are identified as the most viable catalysts for such systemic shifts, as they possess the resources to develop the necessary legislation and implement criteria that reward high-performing, sustainable projects (ITW13). These incentives are intended to stimulate competition and, in turn, establish new industry standards across the production chain. However, these programmes also suffer from a critical limitation: their relatively short lifecycles, often spanning only a few years, make it difficult to sustain long-term commitments and embed environmental priorities into the structural fabric of the industry (ITW13).

5.10. Sweden

Institutional landscape

The Swedish audiovisual sector is organised around the Swedish Film Institute (Svenska Filminstitutet, SFI), which was established in 1963 by the Swedish state and representatives of the film industry. The Institute is responsible for supporting the production, distribution and promotion of Swedish film, preserving Sweden's film heritage and representing Swedish cinema internationally. Its activities are funded by the Ministry of Culture and, since 2017, entirely financed through public funding ([SFI, 2024a](#)). The SFI also plays an active role in sustainability initiatives at the Nordic level and is one of the signatories to the NES ([The Five Nordics, n.d.](#); [Nordisk Film and TV Fond, 2025b](#)).

Media regulation is overseen by the Swedish Agency for the Media (Mediemyndigheten), created in 2024 through the merger of the Swedish Press and Broadcasting Authority and the Swedish Media Council. Also operating under the Ministry of Culture, the agency is responsible for licensing, registration and supervision of broadcasters and on-demand audiovisual services, and monitors compliance with broadcasting rules ([Mediemyndigheten, n.d.](#); [EPRA, 2024](#)).

At the regional level, sustainability is also promoted through film funds such as Film i Väst, Film i Skåne and Film i Dalarna, which have gradually integrated environmental requirements into their funding schemes. Supported productions are generally required to submit environmental plans and sustainability reports, often using tools such as Hållbar Film Tool, a sustainability planning tool developed in cooperation with Film i Väst ([Hållbar Film, n.d.](#)).

Beyond public institutions, industry-led governance, the Swedish Film & TV Producers Association (*Film & TV-producenterna*) formed an Ecological Sustainability Council bringing together production companies, the SFI, broadcasters, and streaming platforms ([Ecoprod, n.d.](#)). The association actively collaborates with the Green Producers Club, providing financial incentives for members to measure their climate impact via the Green Producers Tool ([Film & TV-producenterna, n.d.](#)). Additionally, a network of 19 Nordic regional and national offices, including several Swedish representatives, established a shared regional coalition, adopting a collective pledge and guidelines to formally commit to a more sustainable film industry ([NETVE, 2025c](#)).

Political context

In Sweden, sustainability is not only understood as a question of reducing the environmental footprint of cultural activities but also as a broader societal issue linked to the role of culture in shaping public attitudes and behaviours. The interviewee referred to discussions held within the Open Method of Coordination (OMC) working group in Brussels, which explored different ways of supporting the SCT across the CCI (ITW3; [European Commission, 2022](#)). One of the main ideas emerging from these discussions was the capacity of culture and storytelling to

mainstream the idea of a sustainable future and to contribute to wider societal awareness of environmental challenges. In this perspective, training, education, incentives and awareness-raising measures are viewed as important instruments for supporting the transition (ITW1; [European Commission, 2025b](#)).

At the same time, the interviewee noted that sustainability-related issues currently compete with other major political and societal concerns. According to the respondent, events such as the COVID-19 pandemic, the war in Ukraine and broader geopolitical tensions have reduced the prominence of environmental issues in public decision-making. Nevertheless, sustainability remains closely connected to other policy priorities, particularly security. Questions related to energy, resilience and resource management are increasingly understood as intertwined with European security concerns, making the SCT part of a wider strategic agenda rather than a standalone environmental objective (ITW3).

Instruments and their reception

In terms of sectoral regulation, Sweden has a regulatory framework based on two key instruments: the 2017 Climate Act and the transposition of the European EED. Adopted in 2017, the Climate Act sets a national target of carbon neutrality by 2045, with an 85% reduction in emissions compared to 1990 levels ([Swedish Environmental Protection Agency, 2024](#)).

In Sweden, the ecological transition of the audiovisual sector is part of a decentralised system, where national policy led by the SFI is coordinated with the actions of several regional funds such as Film i Väst, Film i Skåne and Film i Dalarna. These organisations co-finance productions filmed in their territory while adapting the guidelines defined at national level ([SFI, 2024b](#)).

The NES constitutes the most significant industry-impulsed sustainability initiative implemented in the Swedish and Nordic audiovisual sectors to date. Previous initiatives aimed at encouraging more sustainable production practices existed, but none had achieved a comparable scale or level of coordination. Rather than developing a specifically Swedish framework, stakeholders chose to build on existing initiatives and establish a common Nordic standard, which was perceived as more efficient and better adapted to a highly interconnected regional production landscape. It was also emphasised that the initiative has been particularly well received by stakeholders, who generally see clear benefits in having a common Nordic framework rather than multiple competing standards ([NFTVE, n.d.](#); ITW3).

Through the SFI, Sweden participated in the NES, a common sector-led standard developed in 2022 by the Nordic countries to harmonise environmental criteria in production support. This standard provides for the formal integration of mandatory environmental criteria into national and regional funding programmes by 2026. Production will therefore have to demonstrate the implementation of measurable actions in the areas of transport, energy consumption, materials, biodiversity and waste management (further information in section 5.11) ([NFTVE, 2025b](#)).

As part of this effort, the SFI has published a handbook on sustainable film production, providing voluntary guidelines for reducing production-related emissions, which is a Swedish version of the existing European guide to sustainable production ([Fritzsche, n.d.](#); ITW3).

The SFI in partnership with regional film funds, has also launched the national platform Hållbar Film (Sustainable Film), a collaborative network aimed at sharing tools, data and common methodologies to enhance the sustainability of audiovisual production ([Fritzsche, n.d.](#)). This initiative led to the development of the Hållbar Film Tool (Sustainable Film Tool), an online carbon measurement tool designed for producers to measure, plan and monitor the environmental impact of productions ([Green Film Shooting, 2022](#)). However, the Hållbar Film Tool was never primarily conceived as a carbon accounting tool. Instead, it functioned mainly as a guidance and awareness-raising instrument designed to help productions better understand their environmental impacts and identify areas for improvement. The tool was eventually discontinued because no organisation was responsible for maintaining and developing it over time, although some regional film funds continue to use elements of it. According to the respondent, the implementation of the NES is expected to progressively replace this earlier initiative (ITW3).

This NES tool enables productions to assess their emissions, generate standardised reports for funding bodies and identify areas for improvement. It forms part of the environmental reporting system introduced under the NES, which requires publicly funded productions to document their emissions and sustainability efforts as a condition for receiving support ([NETVF, 2025b](#)). However, carbon accounting remains only one component of the framework. Producers are free to choose their preferred calculator, provided that it delivers a credible assessment of emissions. Although the Green Producers Tool has become a de facto standard in parts of the Nordic region, only two of the thirty-eight NES requirements directly concern CO₂ measurement, reflecting the broader sustainability ambitions of the standard (ITW3; [Finnish Film Foundation, n.d.](#)).

The shift from voluntary to mandatory sustainability funding marked a major sector turning point. Before, few productions incorporated sustainability without incentives or funding criteria. Now, compliance with the NES is essential for SFI support. While sustainability was once considered by a limited number of productions, the new rules aim to make it standard in audiovisual production. The respondent believes these requirements will soon be viewed as normal business practice rather than an extra initiative (ITW3; [SFI, 2026b](#)).

Training, skills upgrading, and shared knowledge frameworks constitute another pillar of the Swedish strategy. To support professional development, Film & TV-producenterna collaborated with the Swedish Cultural Academy to launch a self-paced online course on ecological sustainability for film and TV production, which consists of a 2-to-5-hour digital training that provides practitioners with practical tools, inspiration, and strategic guidance to integrate eco-responsible choices into their daily operations ([Film & TV-producenterna, n.d.](#)).

Complementing these training efforts, regional and national offices across the Nordic network signed a joint pledge that pairs institutional commitments with concrete operational guidelines for productions ([Film & TV-producenterna, n.d.](#); [Fritsche, n.d.](#); ITW3).

Beyond financing, filming in Sweden is subject to a rigorous environmental framework based on the Swedish Environmental Code (Ds 2000:61), which is the benchmark for national environmental law. This code incorporates EU environmental standards and regulates filming permits in natural areas. Local and regional authorities responsible for issuing permits must ensure compliance with the principles of the Code, particularly those relating to the protection of biodiversity and sensitive ecosystems. Sweden also applies the principle of 'allmansrätten' (right of public access to nature), which allows anyone to freely explore natural areas. However, this right comes with a duty to respect nature and private property. Audiovisual productions filming in these areas must obtain a specific permit if they are likely to disturb the environment or use protected areas ([Fritsche, n.d.](#)).

Regarding digital infrastructure, Sweden is home to one of Europe's largest networks of data centres (Facebook, Microsoft, Amazon, etc.), and their environmental impact is subject to stricter regulation. The Swedish Energy Agency (Energimyndigheten) oversees the implementation of the European EED, making it mandatory, from 2025, to report energy consumption annually, set up a monitoring system and reduce the PUE (Power Usage Effectiveness) ratio. Data centre operators are encouraged to improve their energy efficiency and reuse residual heat from servers, particularly to supply district heating networks, in accordance with national energy performance monitoring requirements ([Swedish Energy Agency, n.d.](#); [European Commission, 2024a](#)).

Domestic and international cooperation

The implementation of the NES itself reflects a long-standing tradition of cooperation between Nordic film institutes, which work closely together and regularly exchange experiences, practices and lessons (ITW3, [NETVE, 2025c](#)). Beyond the Nordic region, Swedish stakeholders also participate in broader European exchanges through an informal working group bringing together organisations implementing similar ecological standards across Europe, particularly Germany, Austria and France. These exchanges are perceived as valuable opportunities to share experiences, discuss implementation challenges and compare approaches to sustainability governance in the audiovisual sector ([ÖFL, n.d.e](#); ITW3).

This cooperation is also expanding beyond the Nordic countries, with Baltic stakeholders and, more recently, the North American Sustainable Entertainment Alliance seeking to draw on NES experience (ITW3; ITW12, [NB8-Grants, n.d.](#); for more information on NES cooperation see [Section 5.11](#)).

Policy gaps and challenges

A primary policy challenge identified in the sector concerns the persistent gap between public funding practices and environmental goals, as public resources are still frequently invested in activities that contradict the scientific community's recommendations on climate change and environmental sustainability (ITW3). “[...] If I had carte blanche, I would stop subsidising things that are non-sustainable and start funding things that are sustainable, because [...] so much public money is being invested in things that are contrary to what the scientific community is very clear needs to be done.” (ITW3). The sector does not primarily suffer from a lack of information as sustainability issues are already widely documented and discussed. Instead, what is often lacking is a clear signal from decision-makers that sustainability should become an integral part of professional practice. Nevertheless, it was stressed that awareness-raising, guidance, training and education remain important complements to regulatory and financial instruments. Storytelling was also mentioned as a potentially powerful mechanism for mainstreaming the idea of the SCT and embedding sustainability concerns within wider society (ITW3; [European Commission. DG Education, Youth, Sport and Culture, 2025](#)).

At the operational and governance level, the interviewee acknowledged that implementing sustainability measures often encounters psychological rather than technical resistance. Actors may be reluctant to accept new requirements because they are perceived as restrictions on professional freedom, additional administrative burdens, or extra costs (ITW3).

Finally, questions of scale present specific challenges. A Swedish standard would likely have been less attractive, while a European standard implemented too rapidly could become excessively broad and reduce stakeholders’ sense of ownership over the process. One respondent explained: “[...] I don't think it would have been possible to develop a Swedish ecological standard. The benefit is exactly that this is on a larger scale because there is so much co-production within the Nordics, and now as a producer you only need to report once to one institution, and that final report will be accepted by all other financiers or co-producers. So I think the regional level has been key. [...] A possible European level would have been too large to start with. When the scope becomes too large, the people who are governing and developing the standard kind of lose a sense of being able to take part and develop it and participate.” (ITW3).

Emerging trends and future prospects

The most effective way identified to accelerate the sustainable transition of the audiovisual sector would be to stop supporting unsustainable practices and progressively redirect public funding towards sustainable ones. This perspective is closely linked to the broader Nordic approach, which increasingly relies on funding conditions and sustainability requirements rather than on voluntary commitments alone (ITW3). More generally, incentives, funding conditions, and rules and requirements are seen as the most effective instruments for promoting sustainability. According to the interviewee, individuals and organisations rarely take additional

steps towards sustainability unless they are encouraged or required to do so. The NES itself illustrates this logic: while compliance with the standard is formally a requirement attached to funding, it simultaneously functions as an economic incentive because access to public support depends on fulfilling these requirements. The respondent therefore viewed incentives and requirements not as opposing approaches but as complementary mechanisms capable of nudging actors towards more sustainable practices (ITW3; [SFL 2026a](#)). Referring to a recent survey, the interviewee noted that approximately 80% of respondents identified requirements from funders and commissioners as the most effective driver of change. A more sustainable industry was described as potentially more competitive, more resilient and better prepared for future challenges. This was also framed as being in the sector's long-term interest: "[...] One needs to understand that [the aim is] actually to help the industry become more sustainable because [...] they will become more competitive when they are more sustainable, and this industry will be more resilient towards the future. But in order to help them, [...] maybe you need rules and requirements or incentives." (ITW3).

Questions of scale also occupy a central place in the interviewee's reflections defending the Nordic level as the most appropriate governance scale. He argues that the success of the NES is partly explained by the fact that it operates at a level large enough to facilitate co-productions and harmonise reporting requirements, while remaining sufficiently small for stakeholders to actively participate in shaping the framework. Producers only need to report once, and the resulting documentation is recognised across participating institutions and funding bodies. Although the interviewee acknowledged that sustainability requirements can also be implemented effectively at the national level, as illustrated by Germany, the Nordic scale was described as particularly well suited to the realities of regional cooperation and co-production (ITW3). The respondent nevertheless recognised that broader European coordination remains desirable in certain areas. While not advocating for a fully harmonised European ecological standard at this stage, the interviewee noted that the exchange of experiences and practices between countries remains extremely valuable. The Nordic model itself emerged from extensive dialogue and cooperation, and its development reflects a broader trend towards increasing coordination among sustainability actors in the European audiovisual sector (ITW3, [NFTVE 2025c](#)).

Despite changing political priorities, the interviewee pointed to evidence suggesting that public concern about climate change remains high. This observation is supported by the 2025 Eurobarometer, according to which more than nine out of ten respondents in Sweden considered climate change a serious problem, while 91% supported the EU's objective of climate neutrality by 2050 ([European Commission Representation in Sweden, 2025](#)). In this regard, the respondent argued that institutional actors can play an important role in translating societal concerns into concrete initiatives. The interviewee emphasised that their organisation benefits from a unique position within the Swedish audiovisual ecosystem, providing access to decision-makers and industry stakeholders that individual producers would not necessarily

have. This institutional platform has facilitated the promotion of sustainability initiatives and helped build support for measures such as the NES (ITW3).

Finally, awareness-raising, guidance, training and education remain important complements to regulatory and financial instruments. Storytelling was also mentioned as a potentially powerful mechanism for mainstreaming the idea of the SCT and embedding sustainability concerns within wider society (ITW3). Beyond technical measures and funding conditions, there remains a continuing need to explain the environmental challenges facing society, to discuss planetary boundaries, and to foster a broader understanding of why sustainability matters. While requirements and incentives are considered essential drivers of change, they are viewed as most effective when combined with ongoing efforts in communication, education and awareness-raising (ITW3; [Directorate-General for Education, Youth, Sport and Culture, 2025](#)).

5.11. A regional collaboration on environmentally sustainable filming criteria: the Five Nordics and the Nordics Ecological Standards (NES)

Institutional landscape and political context

While Sweden and Denmark have developed their own national approaches to sustainable audiovisual production, the most significant institutional development in the Nordic region has been the emergence of a shared regulatory framework bringing together all five Nordic countries (Finland, Sweden, Denmark, Iceland, and Norway) under the umbrella of the Five Nordics. Relative to an ecological standard, the Nordic countries had initially been moving in different directions, with each broadcaster, regional film fund, and film institute developing its own sustainability requirements (ITW12). The recognition that this fragmentation was counterproductive in a region characterised by intensive cross-border co-production led to the creation of the Nordic Ecological Standard (NES) ([NFTVF, 2025a](#)). The Nordisk Film & TV Fond (NFTVF) plays a central coordinating role in this process, alongside the national film institutes and public broadcasters of each country.

Instruments and their reception

The Nordic countries have merged their audiovisual regulatory efforts into a single cooperative framework, the Five Nordics, which includes a dedicated working group on sustainability questions. This group was established following a summit held in Berlin in February 2025 with stakeholders from the Nordic film industry as well as sustainability experts, in the context of the theme year "Nordic Green" declared by the NFTVF in 2023 ([NFTVF, 2025a](#)). The momentum generated by this event led, in December 2023, to the adoption of a Sustainability Pledge by the Nordic Film Commissions, formally recognising the importance of transitioning towards more sustainable production practices and accompanied by an appendix of practical guidelines for both productions and commissioners ([Nordic Film Commissions, 2023](#)). As part of this

collective effort, the working group also organised a joint training programme in partnership with the Hochschule in Stuttgart, through which each Nordic film institute funded the participation of four to five professionals in an online sustainability management course, enabling them to work on set with a recognised certificate.

Building on this foundation, the Berlin conference gave rise to the idea of developing a shared ecological standard for the entire Nordic region. In early 2025, the Five Nordics formally announced the creation of the NES ([NFTVF, 2025a](#)), an ecological code of conduct modelled on the existing German and Austrian standards, set to enter into force on 1 January 2026. The NES applies to all content types (cinema, television, online content, and VOD) across all stages of the production chain, from pre-production through to post-production, regardless of whether the content is produced within or outside the Nordic region. As of November 2025, a broad range of organisations had pledged their commitment to the NES, including national film institutes of the five Nordics, but also public broadcasters, professional associations and producers, regional film offices, industry media, and broader sector organisations ([The Five Nordics, n.d.](#)).

The NES is structured around six thematic categories: general requirements, personnel and material transport, energy use, accommodation and catering, use of materials, and biodiversity, each comprising both mandatory actions and measurable targets ([The Five Nordics, n.d.](#)). As of November 2025, obtaining the NES certification requires the successful implementation of 18 out of 23 criteria, with the Five Nordics having already indicated that this threshold may be revised upward on an annual basis to progressively raise the bar ([The Five Nordics, n.d.](#)). Compliance is verified through a reporting process ([The Five Nordics, n.d.](#)).

Whether the NES is made mandatory or optional as a condition for accessing funding is left to each organisation's discretion. However, for all productions involving a production company, broadcaster, or VOD platform that has pledged commitment to the standard, compliance becomes compulsory ([NES, 2026](#)). The responsibility for verifying that the criteria are met at the end of a production, through an audit, lies with the national or regional organisation responsible for allocating funds, or, in the absence of public funding, with the commissioning broadcaster or platform ([NES, 2026](#)). In Norway in particular, no formal sanction is currently applied when productions fail to meet the standard's criteria; however, completing the relevant forms is a prerequisite for applying for production support, and the introduction of penalties, while not yet in force, is being considered (ITW12).

The NES has been very well received across the industry, with professionals widely recognising the value of operating under a common framework (ITW1, ITW3, ITW9, ITW12). From an industry perspective, one of the key advantages of the NES lies precisely in its regional scope: rather than requiring separate certification processes in each country, producers can rely on a single standard across a region where cross-border collaboration is the norm (ITW12). There has been no resistance from companies or broadcasters; on the contrary, many have made voluntary

commitments ahead of any legal obligation (ITW12). The implementation of the NES by individual film institutes is expected to roll out progressively throughout 2026 (ITW3).

Domestic and international cooperation

The NES has from the outset been built on a logic of knowledge transfer and mutual learning rather than institutional isolation. The NES itself is a direct product of this approach: rather than developing an entirely original framework, the Five Nordics rely extensively on the existing German and Austrian ecological standards, adapting their structure to the Nordic context. As Interview 13 noted, the German standard alone took approximately six years to develop, whereas the Nordic process went from initial concept to implementation in under eighteen months (ITW12). This capacity to build on existing models was described as "not reinventing the wheel" and has also characterised the collaborative dynamic between Nordic and European sustainability experts, with an atmosphere of openness and willingness to share experiences (ITW12).

This spirit of collaboration extends beyond the Nordic region. The Five Nordics maintain active communication with the teams behind the German and Austrian ecological standards, forming an informal working group among countries using comparable frameworks to exchange updates and address shared challenges (ITW12). The NES has also attracted interest from beyond Europe: the Sustainable Entertainment Alliance (SEA), a body representing major American studios including Amazon, Netflix, Paramount, Warner, and Disney, has reached out to explore the possibility of developing a North American ecological standard modelled on European initiatives like the NES (ITW12).

At the regional level, discussions are ongoing to extend the NES framework to the Baltic States, which would be very relevant at the regional level given that a significant share of Nordic productions are shot there, driven by financial incentives. The Baltic film institutes have expressed strong interest in establishing a Baltic Ecological Standard along similar lines, and the NES project manager has been directly involved in supporting this process through seminars and roundtables via the Nordic-Baltic mobility program "Building a green future for Nordic-Baltic audiovisual production" (ITW12, [NB8-Grants, n.d.](#); [Møller et al., 2025](#)). At the broader European level, while some German counterparts have explored the idea of a European-wide ecological standard, the Nordics have expressed caution about scaling too quickly, arguing that there is a risk of diluting the sense of ownership and participation that has characterised the development of the NES (ITW1, ITW3, ITW12).

Policy gaps and challenges

Despite the progress represented by the certification, several structural challenges and gaps remain. A first tension concerns the voluntary versus mandatory nature of compliance. While the NES has been well-received, its application as a funding condition varies across organisations and countries. In Norway, for instance, no formal sanction currently applies when

productions fail to meet the standard's criteria, even though completing the relevant documentation is a prerequisite for funding applications (ITW12). A second challenge relates to the fragmentation of sustainability requirements in the context of European co-productions. The co-financing model characteristic of European audiovisual production often involves a large number of co-producers, each potentially operating under different national sustainability frameworks. This creates an administrative burden that can undermine the efficiency of the NES (ITW9, ITW12).

Emerging trends and future prospects

To address the limitations of voluntary approaches, some industry experts suggest that voluntary commitments are unlikely to produce systemic change without binding requirements attached to financial consequences (ITW5, ITW1). In terms of future governance, the fragmentation of sustainability requirements indicates a need for greater harmonisation across European funding bodies. In the opinion of TW12, while Eurimages and the Creative Europe MEDIA programme have taken steps in this direction by implementing sustainability plans into their funding criteria, these remain non-mandatory with room for improvement (ITW12).

Part 3 - Cross-National Analysis: Enablers, Challenges and Policy Responses

6. SWOT analysis

Having outlined the European ecosystem and mapped the policy landscape across the case studies examined in this research (see a typology in [Annexe 3](#)), this section turns to a comparative SWOT analysis of the strengths, weaknesses, opportunities, and threats affecting the sustainability transition in these different national contexts. Methodologically, this framework evaluates internal factors (the inherent strengths and weaknesses of national AV sectors) alongside external environmental forces, comprising systemic opportunities and threats. This comparative exercise serves a dual purpose: identifying cross-country trends while also highlighting context-specific dynamics that shape the pace and shape of the transition.

This analysis reveals several internal strengths across the markets examined, most notably a relatively well-developed infrastructure for sustainable audiovisual production in several countries, due in some cases to the development of synergies through different policy levels, but also to industrial engagement. It also brings to light several of internal weaknesses, foremost among them the near-total absence of a binding legal and policy framework governing the climate transition in the CCI, AV and VOD sectors. This is reinforced by a persistent bias towards production regulation and an uneven implementation and reception of those frameworks between the countries analysed. Regarding external opportunities, the analysis points to the potential of different levers to accelerate and harmonise AV sustainability policies among the case studies, among which the European Union, notably through Creative Europe or CSRD, but also regional cooperation and existing European AV networks. Finally, several external threats warrant attention, in particular the structural position of VOD platforms outside the reach of existing sustainability frameworks. Contradictory co-production incentives and competing political priorities at the European level also risk slowing down the advancement of more sustainable AV-VOD sectors.

6.1. Strengths

A first strength on which environmentally sustainable policymaking can build is the existence of a relatively well-developed infrastructure for sustainable film production. Across a substantial share of the sample, this infrastructure is structured around a functional division of labour between regional and national actors, as well as across different types of institutions, allowing sustainability governance to draw on multiple, complementary levers rather than a single instrument.

Austria offers a particularly illustrative example of this configuration. Its system coordinates several types of instruments, operating at varying degrees of bindingness and across multiple levels of governance, which together allow the issue to be addressed from several angles simultaneously rather than through a single regulatory channel. In Belgium, by contrast, this coordination is less the product of a deliberately designed architecture than a structural necessity arising from the country's linguistically fragmented allocation of competences. Within this constrained institutional landscape, the willingness of the actors involved has nonetheless enabled the emergence of working groups bridging both within and across linguistic communities, allowing for incremental progress on this issue despite the underlying fragmentation. France, meanwhile, displays a more formalised and clearly delineated system, in which distinct authorities are respectively responsible for cinema-specific matters, for the regulation of audiovisual media and platforms, and for broader environmental policy under the joint supervision of two ministries. This configuration follows a predominantly top-down logic, within which regulatory measures are implemented in parallel by regional film funds operating at the local level. Sweden, finally, exhibits a comparable form of vertical coordination, structured around the SFI, which sets overarching rules at the centralised level, and regional funds, which finance co-productions while operating within the guidelines established by this higher-level framework. More broadly, the existence of interconnected governance networks constitutes a major asset for future VOD regulation. Because streaming platforms operate at the intersection of cultural, digital, and environmental policy domains, effective regulation is unlikely to emerge from a single institution acting alone. Integrated governance systems create multiple entry points through which sustainability objectives can be pursued, facilitate coordination across levels of government, and increase the range of policy instruments available to decision-makers. This institutional density is particularly valuable for an issue such as VOD sustainability, which cuts across territorial scales and policy sectors simultaneously.

A second strength can be identified in cases where, even in the absence of a coordinated public framework, or where such a framework remains only at an early stage, the impetus for change is driven by industry actors themselves. In Denmark, the entire public sector alongside several private broadcasters have come together within the BFTP alliance, precisely in an area where public authorities lack sufficient mandate to act. In Poland, a strong push from the producers' association, together with several regional commissions, has driven the adoption of new rules, ultimately resulting in a reform of the funding legislation. To a more limited extent, Romania also shows evidence of such dynamics, with certain local-level initiatives acting as isolated "pockets" of change that sustain interest in these issues at the micro level. In these cases, it is clear that it is essential to involve professional associations. Indeed, in many cases, public regulatory bodies are unwilling or unable to take the place of the market or interfere with the way it operates. An inter-professional alliance bringing together members of the industry and involving public stakeholders is more likely to succeed, as it already organises the industry's needs and aspirations and facilitates dialogue with regulatory bodies.

A further strength shared by all countries in the sample is the presence of established institutional actors capable of providing leadership on sustainability issues. National film institutes already occupy a central position within audiovisual ecosystems, combining sectoral expertise, recognised legitimacy, and regular interactions with producers, broadcasters, public authorities, and funding bodies. This places them in a particularly favourable position to act as coordinators, knowledge brokers, and policy entrepreneurs in the development of sustainability strategies. In the Netherlands, for instance, the NFF has already chosen to take up this role on its own initiative. In Romania and North Macedonia, although equivalent regulatory frameworks remain underdeveloped, the CNC-R and the AVMU could reasonably serve as focal points for future action. The existence of such recognised institutions reduces the need to create entirely new governance structures and provides policymakers with ready-made interlocutors capable of translating environmental objectives into sector-specific practices.

Finally, despite uneven levels of progress across the sample, a growing knowledge infrastructure is beginning to emerge around sustainable audiovisual production. Certain organisations, such as Evergreen Prisma in Austria, increasingly function as reference centres, combining training activities, technical expertise, data collection, and policy debate. The gradual accumulation of evidence, methodologies, and practical experience represents an important strength, as it allows policymakers and industry actors to move beyond experimentation and build on an expanding body of lessons learned. Continued efforts to collect, compare, and share information across countries and institutions will be essential to improve the granularity of policy design and better identify which measures are effective under different contextual conditions.

6.2. Weaknesses

Among the examined case studies, several weaknesses are reported by interviewees quite frequently, to suggest that these are not national or regional peculiarities but rather weaknesses in the way sustainability is integrated into the AV-VOD sectors in Europe.

The key finding that emerges from this cross-analysis is the almost total absence of a legal and policy framework governing the climate transition in the CCI, AV and VOD sectors. Although measures are being introduced by institutions, organisations and industry, these generally take the form of voluntary actions or mechanisms based on financial incentives or eco-conditions rather than on legal obligations. This characteristic is evident regardless of countries' institutional capacity: it is as visible in smaller markets such as North Macedonia or Romania, where no dedicated legal text currently exists, as it is in countries with more developed funding ecosystems such as France or the Netherlands, where sustainability remains framed as good practice rather than as a condition attached to public support. Poland illustrates a related but distinct variant of this pattern: the national government remains in a largely reactive posture, prioritising administrative safety nets over a proactive environmental strategy. In the absence of centralised political willingness, the Polish transition has instead been driven from the bottom

up, through grassroots alliances such as Film dla Klimatu and regional initiatives. The reliance on the industry's willingness to engage, as observed in Austria, illustrates how the absence of binding obligations shifts responsibility for the pace of the transition onto sectoral actors themselves, with uneven results depending on political context.

A second, equally widespread weakness is that existing measures are concentrated at the audiovisual production stage of the value chain, leaving distribution largely unaddressed. This is acknowledged in countries such as Belgium and France, where current frameworks are designed around production-related criteria and carbon assessments, while the environmental footprint of distribution networks and digital delivery infrastructure remains outside their scope. This is not merely a matter of insufficient ambition. Production is generally the stage for which data is most readily available and for which interventions are most operationally feasible, which explains why public funders have tended to prioritise it. However, as measures targeting production improve, distribution is the next significant policy gap.

The vulnerability of sustainability measures to shifting political priorities is also highlighted. This vulnerability is unevenly distributed, depending on how deeply such measures are anchored in the legal mandate of the institutions responsible for them. Because most national and regional funds depend directly on government appropriations, their capacity to advance ambitious sustainability agendas is closely tied to the political orientation of the moment. This dependency is particularly visible in federal or decentralised contexts such as Belgium, where different regional funds answer to different governments and consequently advance at different speeds. It is also apparent in the Netherlands and Sweden, where sustainability initiatives, even when institutionally embedded, remain contingent on a degree of political goodwill that cannot be taken for granted over time. Denmark illustrates a related but distinct dynamic: because momentum there has been driven primarily by industry actors rather than the state, the sector has proven comparatively less exposed to domestic political cycles, yet it remains vulnerable to broader international shifts. Austria offers a partial counter-example. By inscribing the obligation to support ecologically sustainable production directly into its film funding legislation, the country has secured a degree of institutional permanence that other national funds, dependent on discretionary administrative practice rather than legislation, do not enjoy. This legal anchoring, however, governs the funding institution's mandate rather than the productions themselves. Certification under the UZ76 Ecolabel remains voluntary, and stakeholders themselves note that further progress may be difficult to sustain through voluntary mechanisms alone.

In smaller markets, economic constraints are viewed as a core element that places sustainability considerably lower on the sectoral priority list. In North Macedonia and Romania, interviewees consistently described an audiovisual sector primarily concerned with its own economic survival, in which environmental considerations are perceived as secondary to more immediate financial pressures. This dynamic is not limited to these two countries but appears more acute in smaller, more financially constrained markets across the region, suggesting that

sustainability policy design needs to account for significant disparities in implementation capacity rather than assuming a uniform baseline across MS.

A further weakness lies in the uneven reception of sustainability requirements within the industry. While some segments of the sector, particularly younger professionals and frontrunner organisations, view these measures as a genuine and welcome driver of change, others experience them primarily as an additional administrative burden layered onto already demanding production processes. This division is not solely based on generational or institutional factors; it also indicates a deeper psychological resistance to changing long-standing work practices, a point highlighted in the Dutch and Swedish case studies. This implies that for a sustainability framework to be effective, it must not only have sound legal and financial elements but also foster authentic engagement with the sector's working culture.

Finally, several interviewees identified script development and storytelling as important but largely overlooked dimensions of the sustainable transition. Across the countries studied, public institutions remain reluctant to intervene in content creation, generally invoking artistic freedom as a key principle. As a result, most sustainability policies focus on production practices and operational processes, while the potential of audiovisual works to shape public perceptions and promote more sustainable behaviours remains largely unexplored.

6.3. Opportunities

A first opportunity lies in the role the EU could play in accelerating the development and harmonisation of audiovisual sustainability policies, particularly for countries whose national systems remain weakly structured. In Romania, for instance, most of the dynamic observed already stems from European frameworks such as Eurimages or Creative Europe MEDIA, suggesting that a more assertive EU-level intervention could rapidly compensate for the current lack of domestic momentum. Similarly, in North Macedonia, the EU accession process constitutes a powerful driver of regulatory convergence, indicating that an explicit strengthening of European sustainability requirements for the audiovisual sector could accelerate a transition that remains, for now, largely dependent on the sector's own goodwill.

For other countries, by contrast, cooperation at a smaller scale, among geographically close countries facing similar realities, appears to be a more promising avenue than broad European harmonisation. This is precisely what the Nordic case illustrates: regional cooperation between Sweden, Denmark and their neighbours has enabled the rapid emergence of the NES, a standard that stakeholders consider to be calibrated at just the right scale, neither too narrow to allow for genuine pooling of resources, nor too broad to preserve a sense of ownership. The planned extension of this standard to the Baltic states points in the same direction, as does the Netherlands' interest in Benelux-level cooperation, seen as a more realistic testing ground than immediate EU-wide harmonisation.

A third opportunity concerns the possibility of drawing on already existing supranational networks, such as Green Co/Pro Europe or CineRegio, or of establishing dedicated channels to facilitate knowledge-sharing between more advanced and less advanced countries on these issues. The Polish case already illustrates this dynamic, as national actors explicitly draw inspiration from foreign models such as Austria's Evergreen Prisma; a more systematic structuring of such exchanges, for instance through networks in which Austria is already active, could amplify this learning effect at the European level.

A further opportunity originates from the growing centrality of streaming platforms within audiovisual ecosystems. Unlike traditional broadcasters, major VOD platforms simultaneously influence production practices, distribution infrastructures, and audience consumption patterns. Their hybrid position across several stages of the value chain creates opportunities for sustainability measures capable of generating effects beyond a single segment of the industry. This structural potential is reinforced by the European regulatory landscape, as major VOD providers now fall under the scope of the CSRD. Consequently, these corporate actors are no longer external to environmental governance; rather, they are legally obligated to audit, disclose, and mitigate their systemic impacts. If adequately engaged, platforms could become important vectors for the diffusion of sustainability standards, both through their commissioning practices and through decisions relating to content delivery, user interfaces, and technical infrastructures. As one interviewee mentioned, "The three motivators are the investor community for public-facing companies, next generation, youth and workforce and then regulations. And then I guess the fourth one would be just business. If you're not incentivised by any of those other factors, you're incited by business opportunities. And if your customer is demanding that you have to have certain report-outs, then that's a pretty big incentive." (ITW2).

Finally, for countries with comparatively small domestic audiovisual markets, international co-production and funding schemes represent a potentially powerful lever, as already identified by several interviewees. Insofar as these countries are structurally dependent on external funding to sustain their production, embedding sustainability criteria into the conditions attached to such international funding could exert a decisive knock-on effect on domestic practices, without requiring prior domestic regulatory reform. This position was mentioned by an industry expert: "Unfortunately, smaller countries are still behind in their state policy in terms of Green Filming, and we're trying to cope with the world and European trends on our own. It's essential for us to have certain and specific knowledge on how to comply with the requirements that are already set in the bigger EU countries. On the other hand, we're producing films that are with low to middle budget and it's easier to apply Green Policies, as we strive to save valuable resources." (ITW21).

6.4. Threats

The case studies converge on a series of external threats that operate beyond the control of national policymakers, regulators or funding bodies. These threats point towards limitations that cannot be resolved through domestic reform alone and that call instead for coordinated action at the European or international level.

The most significant and consistently identified threat concerns the structural position of VOD platforms relative to existing sustainability frameworks. Interviewees described global streaming platforms as operating largely outside the reach of national and even European sustainability instruments, relying instead on their own internal certification systems and environmental policies. This is noted in Belgium and the Netherlands, where platforms such as Netflix are described as structurally indifferent to local public policy, and in France, where engaging platforms in national sustainability frameworks is considered difficult given that they operate according to their own standards. North Macedonia adds a further dimension to this threat, highlighting that the competitive pressure exerted by major international platforms, combined with market saturation, leaves limited room for smaller national VOD initiatives to assert any meaningful influence over platform practices. “The VOD market is highly saturated, with a few global players dominating more than 70% of the segment, which makes it hard for smaller platforms to compete even before investing in green transitions. [...] We face inflation and high production and dubbing costs [...], while piracy and low willingness to pay in this part of Europe reduce revenues. [...] All this means that independent platforms operate with tight margins [...], leaving little room to invest in dedicated sustainability strategies, measurement tools or new green technologies.” (ITW19). Taken together, these observations suggest that the governance gap surrounding VOD platforms is not a temporary regulatory lag specific to any one country, but a structural feature of the current sustainability landscape: no level of governance examined in this report, whether national or European, has yet developed instruments capable of meaningfully reaching these actors.

A second, related threat concerns the contradiction between the financing logic of international co-productions and the objectives of environmental sustainability. Because co-production funding mechanisms typically require productions to spend a defined share of their budget in each participating region or country, they structurally generate cross-border travel and associated emissions, even as sustainability frameworks seek to reduce them. As an interviewee described it, “In Denmark, we’re a very small country and the possibility for national funding is not that big. And then you have to travel all over Europe to finance your productions. And that’s really a problem because you have to fly all over.” (ITW7). This tension is explicitly identified in Belgium and the Netherlands, where interviewees describe it as a direct contradiction between regional economic imperatives and climate objectives that current sustainability frameworks have not yet addressed.

The cross-analysis also highlights how sustainability is competing with other political and societal priorities. Although this takes different forms across countries, the outcome is often similar. In Austria, discussions around sustainability are increasingly overshadowed by debates on artificial intelligence. In Denmark, interviewees linked the declining visibility of climate issues to broader geopolitical developments and a perceived weakening of international climate commitments. In Romania, sustainability competes with concerns about disinformation, transparency, and democratic resilience, while in Sweden, geopolitical tensions and security issues have pushed environmental questions further down the political agenda, despite continued public concern about climate change. Poland illustrates another aspect of this challenge. Because sustainability policies have been largely driven by EU requirements and deadlines rather than strong domestic political commitment, future changes in European priorities could slow or weaken ongoing progress. Across these different contexts, sustainability appears to remain a fragile policy priority, easily displaced when other issues are perceived as more urgent.

While European harmonisation is generally seen as an opportunity to improve coordination and reduce fragmentation, several interviewees also highlighted potential risks. A first concern relates to the pace and scale of harmonisation. In Sweden and North Macedonia, respondents argued that a European framework introduced too quickly could struggle to reflect the diversity of national contexts, including differences in market size, institutional structures and energy systems, which can directly affect the relevance of sustainability requirements and carbon accounting methodologies. Swedish stakeholders, in particular, viewed the Nordic Ecological Standard as successful precisely because it was developed at a regional scale, where participating countries share relatively similar production environments and policy priorities. In their view, a European framework risks becoming too broad and distancing stakeholders from the standard-setting process if introduced prematurely.

Finally, another concern relates to the recognition and alignment of sustainability standards across countries. Interviewees in France and Belgium warned that mutual recognition mechanisms could either encourage a downward harmonisation of requirements or create incentives for producers to seek certification in countries with less demanding standards. “What would be useful is some form of mutual recognition between the different labels, so that if a production has been certified in Italy, for example, that certification would also be recognised in France, Germany and elsewhere. But we also have to remain realistic about the fact that productions are looking for funding, and if there are differences [between the requirements], this could indeed become an issue.” (ITW14). Denmark raised a related issue from a different perspective. Having adopted the NES, Danish stakeholders expressed concern that highly demanding sustainability requirements could complicate cooperation with partners operating under less developed frameworks. Taken together, these observations suggest that future European harmonisation will need to balance consistency and comparability with sufficient flexibility to accommodate different national contexts and levels of regulatory development.

7. Political pathways in the post-SDGs era

After conducting a detailed analysis of existing policies and frameworks and their relevance to the SCT (see [Annexe 3](#)), this section aims to move to a more general level and examine these policies in light of the SDG agenda and the reflections that structure its post-2030 version. This section is structured among three points: first, it looks at how culture is treated in the current SDGs; second, it focuses on the reception of the actual SDGs among the aforementioned policies and frameworks; then, it elaborates some recommendations for a future agenda post-2030.

7.1. The SDG agenda and culture, in a post-2030 perspective

The SDG agenda ends in 2030, which has triggered debate over what should come next. Culture is often called the "missing pillar" of sustainable development (British Council & Julie's Bicycle, 2021). No SDG target is dedicated to it. It only appears indirectly, mostly through heritage protection, with no way to measure its contribution to the other goals (Dâmaso, 2025). This has been true since 2015: culture was only linked to four other themes (education, economic growth, consumption patterns, sustainable cities), but never as its own goal (Duxbury et al., 2017). Duxbury et al. (2017) describe three possible roles for culture: in sustainability, for sustainability, or as sustainability, reflecting ongoing disagreement about whether culture is a fourth pillar, a cross-cutting mediator, or the foundation of the other three.

At the EU level, this gap between rhetoric and practice shows up repeatedly. The Green Deal does not mention culture ([European Commission, 2023](#)). The Council Work Plan for Culture recognises the link between culture and sustainability on paper, but in practice sustainability only becomes a real priority in programmes already tied to the environmental pillar of the SDG strategy (Dâmaso, 2025). Creative Europe shows the same pattern: in the MEDIA strand, sustainability support exists but stays secondary to the market-expansion objective; the Greening the Creative Europe Programme report confirms this, noting that "green" funding mostly goes to awareness campaigns rather than concrete environmental tools ([European Commission, 2023](#)). The Voices of Culture report similarly frames CCIs as tools for raising awareness and spreading good practice, not as a sector under direct environmental regulation (Voices of Culture & Goethe Institut, 2023).

UNESCO has advocated for a different integration of culture in the agenda: in the MONDIACULT 2022 declaration, culture's role is reaffirmed in sustainable development, peace and stability ([UNESCO, 2023](#)). The report also calls for integrating heritage and creativity into climate discussions, and asks for operational guidelines aligned with existing climate frameworks (UNFCCC, IPCC, UNEP). Two demands stand out: that culture be recognised as a global public good and become its own goal post-2030, and that tools be developed to actually measure its impact ([UNESCO, 2023](#)). The 2025 report "Culture, the Missing SDG", also under the patronage of UNESCO, adds weight to this, stating that none of the four climate-related SDGs (11, 13, 14,

15) is on track, with some indicators even going backwards. Instead of framing culture as a victim of climate change, the report frames it as a resource: cultural knowledge, languages and practices can be mobilised for climate action, as shown by initiatives like Entertainment and Culture for Climate Action (ECCA) and Film & Television for Climate Action (Ottone Ramírez & UNESCO, 2025). However, the movement is still institutionally weak. The 2024 Pact for the Future, which was meant to set the direction for the post-2030 agenda, gives culture no dedicated goal at all (Dâmaso, 2025).

7.2. Current perceptions of the SDG agenda in the AV/VOD sector

Building on the literature's suggestion that culture should be integrated as a core pillar of the SDGs, this section examines how field actors position themselves regarding the SDG agenda in general. It begins with a quantitative overview of the policies described in this report to determine whether they run parallel to SDG measures either explicitly (by naming the SDGs) or implicitly (by adopting their principles without explicit mention). Subsequently, the section presents the subjective perspectives of the interviewees to identify any further insights emerging from their accounts.

On the one hand, to assess the extent to which sustainability policies draw on the SDG agenda, all policies presented in this report were analysed. Their founding documents were reviewed to determine whether they explicitly reference to or draw upon the UN SDG framework (see [Annexe 3](#)). Of the 60 national policies analysed, including the climate laws and frameworks, but excluding European-level measures, only 7 cite or draw on the SDGs, representing roughly 10% of the measures accounted for in this report. Notably, all 7 originate either from subnational public institutions (5) or from an industry alliance (2); no national government or EU-level measure in the sample makes explicit reference to the SDG framework.

Three distinct relationships to the SDG framework can be identified. First, 5 measures treat the SDGs as a driving impulse: their founding documents cite the framework as a source of legitimacy or justification for the measure itself. Second, 2 measures reference the SDGs more loosely, as an additional interpretive lens for framing sustainability issues, without deriving their legitimacy from the framework. Both cases nonetheless constitute what can be termed direct parallelism with the SDG agenda, in that the SDGs are explicitly named in the policy's own documentation, whether as a foundation or as a point of reference. Third, the remaining measures, by contrast, show an implicit parallelism: while they establish practices that contribute to the achievement of the SDGs, they do not cite the framework as a point of reference. This is largely explained by the fact that these measures instead draw on other reference frameworks, whether national legislation or international frameworks such as the European Green Deal or the Paris Agreement, which, while closely aligned with or explicitly referencing the SDGs at a high level, serve as the primary direct benchmarks for these local policies.

On the other hand, the policymakers and experts interviewed for this report were also asked about their awareness of international environmental frameworks. This allowed this report to analyse their subjective perception of these programmes and to see the extent to which those frameworks are active in their daily work. A question about the SDGs was included in this questionnaire (see [Annexe 1](#)).

Overall, a major observation to be made is that across 8 interviews, despite the question on international frameworks being raised, interviewees made no mention of the SDGs. This may reveal either a lack of knowledge on the subject or a perception that the framework is irrelevant (ITW4, 8, 9, 10, 11, 12, 13, and 21). In the remaining interviews, the opinions expressed about the SDGs can be summarised as follows.

First, several interviewees mentioned that a positive aspect of the SDGs is that they have provided a framework for discussion on environmental issues, offering a common framework and a shared language, which is a welcome step towards greater awareness. In this sense, they stated that this framework has had an impact on the development of environmental awareness in the sector.

However, many interviewees specified that this role was sometimes limited to a simple mention providing context on public policies or measures to be implemented, without any concrete impact. One interviewee even specified that the role of the SDGs was limited to being displayed on the first slide of a PowerPoint presentation at conferences. Another interviewee noted, "It's a 'Nice to have'" (ITW17). It was also lamented that this framework, while promoting a common language, provides no concrete elements for implementation. Two interviewees (ITW15 and ITW18), one representing the industry and the other policymakers, stated that the agenda's indicators are inappropriate for the subject matter and therefore fail to assess the potential impact of the measures taken.

Second, another major opinion raised was that the SDG framework is entirely bypassable, as one can care about the environment without necessarily referring to it. This reflects a trend observed in quantitative analysis: a vast number of measures taken stem either from public authorities based on national laws or from industry initiatives, rather than directly from the SDGs. Other frameworks, both national and international (European), provide relevant structures for addressing this issue. This is particularly noticeable in Romania and North Macedonia, which rely instead on instruments such as Creative Europe or the AVMSD. The AVMSD makes no specific reference to the SDGs. Creative Europe, on the other hand, mentions in recitals 35 and 36 that the programme aims to contribute to the UN's SDG targets, representing an indirect reference. Two other interviewees, one from the industry and one policymaker working directly on climate issues within the audiovisual industry, even admitted to never having used the SDG framework.

However, it must be noted that this disconnect is sometimes unconscious rather than deliberate: several interviewees who identified the SDG framework as irrelevant described practices such as promoting gender inclusion that correspond to SDGs targets, without identifying them as such. This suggests that implicit alignment with the SDG agenda quantified in the previous section may be underestimated.

Third, a smaller minority of opinions suggest that the framework is perceived either as overly activist, leading to rejection, or conversely, as a bureaucratic exercise too far removed from the work of VOD companies. Operating primarily in B2B markets with limited direct customer feedback, these companies reportedly lack both the incentive and the obligation to consider this framework (ITW2).

In conclusion, this section indicates that the 2030 Agenda has not served as a significant reference point for the stakeholders covered in this report. For various reasons, they find it poorly adapted and consequently base their practices on other legal frameworks or individual initiatives. Building on these findings, the following section explores potential pathways if culture were to have its own dedicated SDG.

7.3. Potential avenues between existing practices and the post-2030 SDGs

The previous section showed that there is already a weak alignment between the SDGs and the practices examined in this report. This section looks to the future: will post-2030 agenda dynamics bring more concrete measures to sectoral practices, or will they remain at the same level of abstraction?

First, it is difficult to define the scope of this potential new SDG. Culture itself is a very broad field, encompassing disciplines as diverse as the protection of intangible heritage, architecture, language, and audiovisual creation. According to the literature, there would be a real positive impact in integrating culture as an independent pillar of the SDGs, but concrete indicators have yet to be determined ([UNESCO, 2023](#); British Council & Julie's Bicycle, 2021; Ottone Ramírez & UNESCO, 2025). Even though the idea of including culture as the missing pillar is supported, it lacks more concrete guidance on how to implement it.

On the one hand, at the ground level analysis, SDG implementation is already stalling under the 2030 agenda. As things stand, the institutions surveyed in this study make little use of the SDG reference framework, or use it more for descriptive than analytical purposes. Perhaps this friction occurs precisely because culture does not have its own SDG: interviewees noted that abstraction and the lack of criteria are detrimental to the proper application of sustainable development principles.

On the other hand, it is worth emphasising that although these organisations do not use the SDG framework, this report nonetheless highlights a whole series of policies and measures that

ultimately contribute to the SDGs (e.g. Nordic Ecological Standard, Evergreen Prisma). A certain alignment can therefore be highlighted: certain actors have practices that fall in line with SDG recommendations, without however drawing their legitimacy from them. This comment applies to both public authorities and industries. Moreover, the cultural sector holds strong potential thanks to its communication power: it can represent a specific added value for the implementation of the SDGs. As one interviewee puts it, "The sector's biggest contribution to the transition might not be greener sets but greener narratives" (ITW18). There is therefore significant potential to be harnessed so that the cultural sector can contribute to the SDGs.

It would therefore be necessary to leverage these more local, grassroots movements and integrate them into an SDG framework. This might help rebuild the connection that currently seems broken. This process benefits from a pre-existing public network supported by numerous EU climate laws, meaning that future efforts do not build in a vacuum. Furthermore, to solve the challenge of quantification, a sustainable solution lies in a dialogue with the sector, ensuring that the indicators used are relevant both to the SDGs and to their way of working. Indeed, when asked about carbon calculators, a large number of respondents stated that they find them indicative but of little use for reducing emissions, remaining descriptive, and that they constitute a heavy administrative burden for very little effect.

The question, then, is not whether the cultural sector contributes to sustainable development: it already does either implicitly or explicitly. The challenge lies in finding specific ways for the post-2030 agenda to bridge the sector's strengths with international frameworks. These ideas will be further explored in a future StreamSCAPES policy brief.

8. Conclusion

This report has provided a comparative cross-national and multi-level assessment of the policy measures shaping the SCT of the audiovisual and VOD sectors across nine European countries: Austria, Belgium, Denmark, France, the Netherlands, North Macedonia, Poland, Romania and Sweden, complemented by a tenth case study on Nordic regional cooperation. Rather than confining its scope to measures explicitly labelled as addressing the SCT or targeting VOD platforms specifically, the analysis has encompassed the broader environmental, climate, digital and audiovisual policies that directly or indirectly shape the sector. Combining desk research with semi-structured interviews conducted with 25 policy officers, sustainability specialists and industry professionals, the study has sought to move beyond a simple inventory of measures to assess their objectives, degree of institutionalisation and perceived effectiveness, while situating national and regional developments within the wider European regulatory context.

Two forms of comparison have structured this analysis throughout. On the one hand, cross-nationally, the report has identified recurring policy instruments, institutional configurations and implementation challenges shared across different markets. On the other hand, a multi-level analysis has shown how national frameworks interact with initiatives

developed by regional and local authorities, film institutes, film funds and industry alliances. These two dimensions reveal a policy landscape marked by institutional density but limited legal formalisation, in which the pace and shape of the transition remain dependent on national context.

Across the sample, a well developed infrastructure for sustainable production has emerged across different levels of governance, whether in centralised systems as in France, or in federal ones as in Belgium and Austria. Where public frameworks remain underdeveloped, industry-driven dynamics, such as the Danish BFTP alliance or the push from Poland's producers' association, have filled part of the gap. Furthermore, established institutional actors as national film institutes constitute accessible interlocutors for future policy development, even in contexts such as Romania or North Macedonia where dedicated frameworks are still absent.

Yet this density has not translated into binding obligation: the report's central finding is the near-total absence of a legal framework governing the climate transition in the CCI, AV and VOD. This is present in all case-studies, regardless of institutional capacity or the maturity of their funding ecosystems, but is reinforced by the vulnerability of sustainability agendas to shifting political priorities where they rest on voluntary administrative practice rather than legislation. What this suggests is not that governance capacity needs to be built from scratch, but that what already exists informally needs to be anchored more firmly in law and in funding conditionality.

This same pattern of partial coverage reappears at the level of the value chain. Existing measures are concentrated at the production stage, where data is available and public intervention feasible. This focus has allowed real progress on the production side but has also left distribution and digital delivery infrastructure largely outside the scope of current regulations. Distribution represents the next significant policy challenge, as the sector lacks the indicators and institutional habits that production already has.

A comparable duality characterises the position of VOD platforms, which stands out as both the most identified structural threat and one of the biggest emerging opportunities. Several interviewees described major streaming platforms as operating largely outside the reach of national and European sustainability instruments, relying instead on their own internal standards. Yet this same structural position has begun to shift, because of the inclusion of major VOD providers within the scope of the CSRD. For this obligation to translate into meaningful influence, a connection is needed between CSRD compliance and existing AV-specific frameworks, rather than treating the two as parallel policy processes.

Sustainability agendas across the sample remain vulnerable to competing priorities, from artificial intelligence imperatives to geopolitical instability, and to the paradoxical financing logic of co-production schemes. Against this situation, regional and European cooperation appear as sources of resilience: the NES illustrates how cooperation at a regional level can generate a positive influence, while EU-level instruments such as Creative Europe programme offer a solution for countries, such as Romania or North Macedonia, whose domestic dynamics remain

externally driven. Extending and connecting these cooperative structures offers a more sustainable path forward than domestic reform alone.

This tension between institutional capacity and regulatory gap is echoed in the report's findings on the SDG agenda. Despite culture's frequent characterisation as the "missing pillar" of sustainable development, the analysis found only marginal explicit engagement with the SDG framework among the policies and stakeholders studied: only 7 of 60 national measures reviewed reference the SDGs directly. The SDGs were more often described as a shared vocabulary than as an operational tool, hampered by a persistent lack of sector-specific indicators. Yet the report also shows that a substantial body of existing practice, from the NES to knowledge infrastructures such as Evergreen Prisma, already contributes to SDG objectives without drawing legitimacy from them, suggesting that the disconnect lies less in a lack of aligned action than in the absence of policy translation between sectoral practices and international policy frameworks.

Moving forward, the challenge is therefore not simply to increase the number of sustainability initiatives, but to strengthen their institutional anchoring, extend their scope across the value chain, and improve coordination between national, regional, European and international levels. Such an approach should combine robust requirements with appropriate financial and technical support, while allowing flexibility to reflect differences in market size, institutional capacity and production environments. In this respect, European cooperation can provide an important framework for convergence and should build on existing national and regional networks as well as sector-led initiatives to advance the climate transition of the AV-VOD sectors.

References

- Abbatescianni, D. (2021, October 27). The MAAP report prompts mixed reactions within the European audiovisual industry. Cineuropa. <https://cineuropa.org/en/newsdetail/412424/>
- Agence de la transition écologique (ADEME) (n.d.a). L'Agence. <https://www.ademe.fr/lagence/>
- Agence de la transition écologique (ADEME) (n.d.b). Audiovisuel responsable. <https://communication-responsable.ademe.fr/audiovisuel-responsable>
- Agence de la transition écologique (ADEME) (n.d.c). De la production à la post-production. <https://communication-responsable.ademe.fr/de-la-production-la-post-production>
- Agency for Audio and Audiovisual Media Services (AVMU) (n.d.). Agency for Audio and Audiovisual Media Services. <https://avmu.mk/en/>
- Agenția pentru Dezvoltare Regională București-Ilfov (ADRBI). (2021). Ghid sustenabilitate si practici verzi in industria productiilor audiovizuale din Romania. <https://www.adrbi.ro/media/2530/green-screen-ghid-sustenabilitate-si-practici-verzi-in-industria-productiilor-audiovizuale-din-romania.pdf?>
- Association of Commercial Television in Europe. (2021, April). ACT views on the Media and Audiovisual Action Plan (MAAP). <https://www.acte.be/publication/act-views-on-the-media-and-audiovisual-action-plan-maap/>
- Autorité de régulation de la communication audiovisuelle et numérique (Arcom). (2023, September 13). Recommandation de l'Arcom sur l'article 26 de la loi visant à réduire l'empreinte environnementale du numérique (loi REEN). <https://www.arcom.fr/se-documenter/espace-juridique/textes-juridiques/recommandati-on-de-larcom-sur-larticle-26-de-la-loi-visant-reduire-lempreinte-environnementale-du-numerique-loi-reen>
- Autorité de régulation de la communication audiovisuelle et numérique (Arcom). (2024, October 7). Étude de l'impact environnemental des usages audiovisuels en France. <https://www.arcom.fr/se-documenter/etudes-et-donnees/etudes-bilans-et-rapports-de-larcom/etude-de-limpact-environnemental-des-usages-audiovisuels-en-france>
- Autorité de régulation de la communication audiovisuelle et numérique (Arcom). (2025, December 4). Bilan d'application de la recommandation issue de l'article 26 de la loi visant à réduire l'empreinte environnementale du numérique.

<https://www.arcom.fr/se-documenter/etudes-et-donnees/etudes-bilans-et-rapports-de-la-rcom/bilan-dapplication-de-la-recommandation-issue-de-larticle-26-de-la-loi-visant-reduire-lempreinte-environnementale-du-numerique>

Afzal, S., Mehran, N., Ourimi, Z. A., Tashtarian, F., Amirpour, H., Prodan, R., & Timmerer, C. (2024). A Survey on Energy Consumption and Environmental Impact of Video Streaming (arXiv:2401.09854). arXiv. <https://doi.org/10.48550/arXiv.2401.09854>

Bæredygtig Film og TV-produktion (BFTP). (n.d.). Om os. <http://bftp.dk/om-os-ql>

Batmunkh, A. (2022). Carbon Footprint of The Most Popular Social Media Platforms. Sustainability, 14(4), 2195. <https://doi.org/10.3390/su14042195>

Bertel, M. (2023). Climate change law and the Austrian federal system. Revista d'Estudis Autònoms i Federals, (37), 61-92. (164881844). <https://doi.org/10.57645/20.8080.01.3>

Beuscart, J.-S., Coavoux, S., & Garrocq, J.-B. (2023). Listening to music videos on YouTube. Digital consumption practices and the environmental impact of streaming. Journal of Consumer Culture, 23(3), 654-671. <https://doi.org/10.1177/14695405221133266>

Bingöl, G., Porcu, S., Floris, A., & Atzori, L. (2023). An Analysis of the Trade-Off Between Sustainability and Quality of Experience for Video Streaming. 2023 IEEE International Conference on Communications Workshops (ICC Workshops), 1600-1605. <https://doi.org/10.1109/ICCWorkshops57953.2023.10283614>

Bourns, W., Duffy, T., Margrett, G., Matthews, A., Whitehead, M., Harris, Y., McFarling, T., Weddup, J., Acharya, D., Bulter, T., Clements, E., Gramegna, I., Hargrave, J., Magnini, E., Mansfield, F., Rabbets, A., & Snelson, T. (2020). A screen new deal: A route map to sustainable film production. albert, BFI, Arup.

British Council & Julie's Bicycle. (2021). *Culture: The missing link to climate action*. <https://juliesbicycle.org/resource/culture-the-missing-link-to-climate-action-summary-report/>

Bucuresti FM. (2024). deFilm redefinește producția de film : Recunoaștere internațională cu Green Filming Award și succes autohton cu trei trofee Gopo. Radio București FM. <https://www.bucurestifm.ro/2024/05/01/defilm-redefineste-productia-de-film-recunoastere-internationala-cu-green-filming-award-si-succes-autohton-cu-trei-trofee-gopo/>

Bundesgesetz über die Errichtung des Klima- und Energiefonds - Klima- und Energiefondsgesetz, Fassung vom 02.12.2025 (KLI.EN-FondsG) https://climate-laws.org/document/climate-and-energy-fund-act_c076?l=austria&o=40

- Bundesministerium Land- und Forstwirtschaft, Klima- und Umweltschutz, Regionen und Wasserwirtschaft (BMLUK). (n.d.). What is the Austrian Ecolabel? <https://www.bmluk.gv.at/en/topics/climate-environment/environmental-protection-company-eia/the-austrian-ecolabel/what-is-the-austrian-ecolabel.html>
- Bundesrecht konsolidiert: Gesamte Rechtsvorschrift für Filmförderungsgesetz, Fassung vom 22.12.2025 <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10009500>
- Cabrera Blázquez, F. J. (2021). European Media and Audiovisual Action Plan. IRIS Legal Observations of the European Audiovisual Observatory, 2021-2, 1/3. <https://merlin.obs.coe.int/article/9100>
- Całus, K. (2026). Romania is no closer to a new government : Political deadlock and the risk of losing Recovery and Resilience Plan funds. OSW Centre for Eastern Studies. <https://www.osw.waw.pl/en/publikacje/analyses/2026-07-14/romania-no-closer-to-a-new-government-political-deadlock-and-risk>
- Carbon Trust. (2021). Carbon impact of video streaming. Carbon Trust.
- Centre national du cinéma et de l'image animée (CNC). (2025, February 10). Éco-conditionnalité des aides du CNC : Remise d'une double empreinte carbone des œuvres. https://www.cnc.fr/professionnels/actualites/transition-ecologique-et-energetique-le-cnc-met-en-place-une-ecoconditionnalite-de-ses-aides_1805866
- Centre national du cinéma et de l'image animée (CNC). (n.d.). La politique environnementale du CNC - Le « Plan Action ! ». https://www.cnc.fr/a-propos-du-cnc/le-plan-action---politique-de-transition-ecologique-et-energetique-des-secteurs-du-cinema-de-laudiovisuel-et-des-industries-techniques_1850685
- Centrul National al Cinematografiei. (n. d.). Schemes. https://cnc.gov.ro/?page_id=52953
- CineRegio (n.d.). Łódź Film Commission. https://www.cineregio.org/members/lodz_film_fund/
- Cine Tirol. (n. d.). Green Filming Austria. <https://www.cine.tirol/en/green-filming-austria-2/>
- CME (2025). CME and Accedo Win Sustainability Award at CSI Award. <https://www.cme.net/press-releases/cme-and-accedo-at-csi-awards-2025>

- Cofiloisirs. (n.d.). Dispositif Cofiloisirs - Ecoprod.
<https://cofiloisirs.com/fr/dispositif-cofiloisirs---ecoprod>
- Commissariaat voor de Media (CvdM) (n.d.). Wet- en regelgeving.
<https://www.cvdM.nl/sector/themas/wet-en-regelgeving/>
- Conseil supérieur de l'audiovisuel (CSA) (2026, January 28). Mieux informer pour mieux agir : lancement du « Baromètre Belge de l'Information Environnementale » et premiers résultats.
<https://www.csa.be/176559/mieux-informer-pour-mieux-agir-lancement-du-barometre-belge-de-linformation-environnementale-et-premiers-resultats/>
- Conseil Supérieur de l'Audiovisuel (CSA) (n.d.). Le CSA. <https://www.csa.be/le-csa/>
- Consiliul Național al Audiovizualului. (2025). Organizarea și funcționarea.
<https://cna.ro/a-organizarea-si-functionarea-vre2honehayvmqrzxl8aiq88/>
- Cucu, C. (2025, November). Disinformation landscape in Romania. EU Disinfo Lab.
https://www.disinfo.eu/wp-content/uploads/2025/11/20251103_Disinfo-landscape-in-Romania-V2.pdf
- Cunliff, C. (2020). Beyond the Energy Techlash : The Real Climate Impacts of Information Technology. Information Technology & Innovation Foundation.
- Dâmaso, M. (2025). The EU's Disjointed Engagement with the Cultural Sustainability Agenda : Rhetoric versus Action. In M. Dâmaso (Éd.), The European Union as a Global Cultural Power (p. 95-116). De Gruyter.
<https://www.degruyterbrill.com/document/doi/10.1515/9783111026558-005/html?lang=en>
- Danish Broadcasting Corporation (DR). (2024). Årsrapport.
https://asset.dr.dk/dr.dk/umbraco-files/bhupe1nv/drs_aarsrapport_2024_final_9f352567.pdf
- Danish Film Institute (DFI). (2020). Nyt partnerskab vil bidrage til bæredygtig omstilling i filmbranchen.
<https://www.dfi.dk/nyheder/nyt-partnerskab-vil-bidrage-til-baeredygtig-omstilling-i-filmbranchen>
- Danish Film Institute (DFI). (2025). Norden går sammen om bæredygtighedsstandard for film og tv.
<https://via.ritzau.dk/pressemeddelelse/14572882/norden-gar-sammen-om-baeredygtighedsstandard-for-film-og-tv?publisherId=13560928&lang=da>

- Danish Ministry of Climate, Energy and Utilities. (2020). Climate Act No 965 of 26 June 2020. Unofficial English translation. https://www.en.kefm.dk/Media/1/B/Climate%20Act_Denmark%20-%20WEBTILG%C3%86NGELIG-A.pdf
- de Almeida Martins, F. N., & Fouladvand, J. (2026). Toward a sustainable TV industry: Measuring the carbon footprint across the entire production life cycle. *Cleaner Environmental Systems*, 22, 100467. <https://www.sciencedirect.com/science/article/pii/S2666789426000735>
- Decree on support for cinema and audiovisual creation of 10 November 2011, as coordinated on 14 October 2024, published in the Belgian Official Gazette on 9 December 2011. <https://gallilex.cfwb.be/textes-normatifs/37248>
- Decree authorising the Flemish Government to join and cooperate in the establishment of the non-profit association Vlaams Audiovisueel Fonds of 13 April 1999, as coordinated on 16 November 2023, published in the Belgian Official Gazette on 15 June 1999. <https://codex.vlaanderen.be/Portals/Codex/documenten/1006940.html>
- Derksen, Z. (2021, June 21). Two years after the Amsterdam moratorium, where does its data center industry stand? Dutch Data Center Association. <https://www.dutchdatacenters.nl/en/nieuws/two-years-after-the-amsterdam-moratorium-where-does-its-data-center-industry-stand/>
- Duxbury, N., Kangas, A., & De Beukelaer, C. (2017). Cultural policies for sustainable development: Four strategic paths. *International Journal of Cultural Policy*, 23(2), 214-230. <https://doi.org/10.1080/10286632.2017.1280789>
- Ecoprod. (n.d.). StepUP map: Green film production around the world. <https://stepup-map.pages.dev/embed/map?lng=fr&country=Sweden>
- Ecoprod. (n.d.a). Carbon'Clap. <https://ecoprod.com/carbon-clap/>
- Ecoprod. (n.d.b). Les aides à l'éco-production. <https://ecoprod.com/les-aides-regionales-a-leco-production/>
- Efoui-Hess, M. (2019). Climate crisis: The Unsustainable use of Online Video—The Shift Project. The Shift Project.
- Elavarasi, J., Amudha, G., Ananthi, S. N., Thilagam, T., Saratha, B., & R, S. S. (2025). Green Data Centers: Advancing Sustainability in the Digital Era. 2025 5th International Conference on Trends in Material Science and Inventive Materials (ICTMIM), 1817-1823. <https://doi.org/10.1109/ICTMIM65579.2025.10988439>

- Eurimages. (n.d.). Strategy and Action Plan. Council of Europe. <https://www.coe.int/en/web/eurimages/strategy-and-action-plan>
- Eurimages. (2025, May 13). Eurimages Sustainability Strategy 2025-2027. <https://rm.coe.int/sustainability-strategy-document-2025-2027-en/1680b6c70c>
- Europa Creativă România (n.d.). Talente și competențe. <https://www.europa-creativa.eu/media/clustere/clusterul-business/talente-si-competente>
- European Audiovisual Observatory. (n.d.a). Dashboard: European VOD data [Data set]. Council of Europe. <https://rm.coe.int/dashboard-european-vod-data/1680b60f97>
- European Audiovisual Observatory. (n.d.b). MAVISE database. Council of Europe. <https://mavise.obs.coe.int/>
- European Audiovisual Observatory. (2016). Focus 2016: World film market trends. Council of Europe. <https://rm.coe.int/focus-2016/168088dcaa>
- European Audiovisual Observatory. (2017). Focus 2017: World film market trends. Council of Europe. <https://rm.coe.int/focus-2017/168088dcab>
- European Audiovisual Observatory. (2018). Focus 2018: World film market trends. Council of Europe. <https://rm.coe.int/focus-2018-world-film-market-trends/1680946e69>
- European Audiovisual Observatory. (2019). Focus 2019: World film market trends. Council of Europe. <https://rm.coe.int/focus-2019/1680994a74>
- European Audiovisual Observatory. (2020). Focus 2020: World film market trends. Council of Europe. <https://rm.coe.int/focus2020/1680a32252>
- European Audiovisual Observatory. (2021). Focus 2021: World film market trends. Council of Europe. <https://rm.coe.int/focus2021/1680a6654d>
- European Audiovisual Observatory. (2022). Focus 2022: World film market trends. Council of Europe. <https://rm.coe.int/focus2022/1680ab25e7>
- European Audiovisual Observatory. (2023a). Focus 2023: World film market trends. Council of Europe. <https://rm.coe.int/focus2023/1680af8b6f>
- European Audiovisual Observatory. (2023b). The application of the AVMS Directive in selected non-EU countries. Council of Europe. <https://rm.coe.int/the-application-of-the-avms-directive-in-selected-non-eu-countries-mk/1680b001dd>

- European Audiovisual Observatory. (2024). Focus 2024: World film market trends. Council of Europe. <https://rm.coe.int/focus2024/1680b5a5bf>
- European Audiovisual Observatory. (2025). Focus 2025: World film market trends. Council of Europe. <https://rm.coe.int/focus2025/48802ba15a>
- European Audiovisual Observatory. (2026). Focus 2026: World film market trends. Council of Europe. <https://book.coe.int/en/european-audiovisual-observatory/12538-focus-2026-world-film-market-trends.html>
- European Commission (n.d.a). Greening the European audiovisual landscape. Shaping Europe's Digital Future. <https://digital-strategy.ec.europa.eu/en/policies/green-audiovisual-landscape>
- European Commission (n.d.b). The European Green Deal. https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en
- European Commission (n.d.c). Green transition. Recovery and Resilience Scoreboard. https://ec.europa.eu/economy_finance/recovery-and-resilience-scoreboard/green.html
- European Commission (n.d.d). Energy Efficiency Directive. https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficiency-targets-directive-and-rules/energy-efficiency-directive_en#energy-performance-of-data-centres
- European Commission (2019). The European Green Deal (COM(2019) 640 final). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52019DC0640>
- European Commission (2020a). Europe's media in the digital decade: An action plan to support recovery and transformation (COM(2020) 784 final). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0784>
- European Commission (2020b). Sustainable Europe Investment Plan: European Green Deal Investment Plan (COM(2020) 21 final). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0021>
- European Commission (2022, September 20). EU experts publish proposals to harness the power of culture for sustainable development. <https://culture.ec.europa.eu/whats-new/news/eu-experts-publish-proposals-to-harness-the-power-of-culture-for-sustainable-development>
- European Commission (2023). Amending Implementing Decision C(2021) 3563 on the financing of the Creative Europe Programme for 2021-2025 and the adoption of the work

programmes for 2021, 2022 and 2023 (C(2023) 6084, 14 September 2023).
<https://culture.ec.europa.eu/resources/document-library/2024-annual-work-programme-for-the-implementation-of-the-creative-europe-programme>

European Commission (2024a). Commission Delegated Regulation (EU) 2024/1364 of 14 March 2024 on the first phase of the establishment of a common Union rating scheme for data centres. https://eur-lex.europa.eu/eli/reg_del/2024/1364/oj/eng

European Commission (2024b). North Macedonia 2024 report (SWD(2024) 693 final).
<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=SWD%3A2024%3A693%3AFIN>

European Commission (2025a, November 4). North Macedonia 2025 report. Directorate-General for Enlargement and Eastern Neighbourhood.
https://enlargement.ec.europa.eu/document/download/267b368e-6b55-4a42-bb72-6395593de4da_en?filename=north-macedonia-report-2025.pdf

European Commission (2025b, December 15). New report on culture and sustainability in Europe is out.
<https://culture.ec.europa.eu/whats-new/news/new-report-on-culture-and-sustainability-in-europe-is-out>

European Commission (2025c, July 2). Commission facilitates data access for researchers under the Digital Services Act. Shaping Europe's Digital Future.
<https://digital-strategy.ec.europa.eu/en/node/13917/printable/pdf>

European Commission (2026, February 10). Commission seeks feedback on review of audiovisual media legislation.
<https://digital-strategy.ec.europa.eu/en/news/commission-seeks-feedback-review-audiovisual-media-legislation>

European Commission. Directorate General for Climate Action. (2023). Climate change : Report. Publications Office. <https://doi.org/10.2834/653431>

European Commission: Directorate-General for Education, Youth, Sport and Culture. (2023). Greening the Creative Europe Programme: final report. Feifs., T., Kruger, T., Rodriguez, A., Buiskool, B.-J., Muller, V., Mohamedaly, A. (Eds). Publications Office of the European Union. <https://data.europa.eu/doi/10.2766/625636>.

European Commission: Directorate-General for Education, Youth, Sport and Culture. (2025). Creative shifts: Empowering culture for sustainable living. Publications Office of the European Union. <https://doi.org/10.2766/6678618>

European Commission, Representation in Sweden (2025, July 4). Klimatförändringarna är ett allvarligt problem, anser européerna.

https://sweden.representation.ec.europa.eu/nyheter-och-evenemang/nyheter/klimatforandringarna-ar-ett-allvarligt-problem-anser-europeerna-2025-07-04_sv?etransnolive=1&prefLang=fr

European Council. (n.d.). Fit for 55. <https://www.consilium.europa.eu/en/policies/fit-for-55/>

European Film Agency Directors association (EFAD). (n.d.a). Netherlands Film Fund. <https://www.europeanfilmagencies.eu/members/netherlands-film-fund>

European Film Agency Directors association (EFAD). (n.d.b). North Macedonia Film Agency. <https://www.europeanfilmagencies.eu/members/north-macedonia-film-agency>

European Film Agency Directors association (EFAD). (n.d.c). Sustainability Working Group. <https://www.europeanfilmagencies.eu/working-groups/sustainability>

European Parliament & Council of the European Union. (2010). Directive 2010/13/EU of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive). Official Journal of the European Union, L 95, 1-24. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010L0013>

European Parliament & Council of the European Union. (2018). Directive (EU) 2018/1808 of 14 November 2018 amending Directive 2010/13/EU on the provision of audiovisual media services in view of changing market realities. Official Journal of the European Union, L 303, 69-92. <https://eur-lex.europa.eu/eli/dir/2018/1808/oj>

European Parliament & Council of the European Union. (2020). Regulation (EU) 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088. Official Journal of the European Union, L 198, 13-43. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020R0852>

European Parliament & Council of the European Union. (2021). Regulation (EU) 2021/1119 of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ("European Climate Law"). Official Journal of the European Union, L 243, 1-17. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021R1119>

European Parliament & Council of the European Union. (2022a). Directive (EU) 2022/2464 of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting. Official Journal of the European Union, L 322, 15-80. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32022L2464>

European Parliament & Council of the European Union. (2022b). Regulation (EU) 2022/2065 of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act). Official Journal of the European Union, L 277, 1-102. <https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>

European Platform of Regulatory Authorities (EPRA). (2024, January 9). The Swedish Agency for the Media: Merger of the MPRT and the SMC. https://www.epra.org/news_items/the-swedish-media-authority-merger-of-the-mprt-and-the-smc

Eurostat. (n.d.). General government expenditure on cultural services, broadcasting and publishing services, 2023 (% of total expenditure). [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:General_government_expenditure_on_cultural_services_broadcasting_and_publishing_services_2023_\(%25_of_total_expenditure\).png](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:General_government_expenditure_on_cultural_services_broadcasting_and_publishing_services_2023_(%25_of_total_expenditure).png)

Evergreen Prisma. (n.d.). <https://www.lafc.at/evergreenprisma/index.php>

Expert Forum. (2024). 2024: Romania's Struggle with Systemic Risks in Digital Services Act Implementation. <https://expertforum.ro/en/2024-romanias-struggle-with-systemic-risks-in-digital-services-act-implementation/>

Film & TV-Producenterna. (n.d.). Ekologisk hållbarhet. <https://filmtvp.se/information/hallbarhet/>

Film New Europe. (2024). Romania Introduces Financial Support for Minority Coproductions. <https://www.filmneweurope.com/news/romania-news/item/126489-romania-introduces-financial-support-for-minority-coproduction>

Finnish Film Foundation. (n.d.). NES: A Nordic Environmental Standard for Audiovisual Productions. <https://www.ses.fi/en/nas/>

Fritsche, R. (n.d.). Green film production in Sweden. StepUP. <https://stepup.ecoprod.com/sweden/>

Gooding, M. (2024, August 22). The ongoing impact of Amsterdam's data center moratorium. Data Center Dynamics. <https://www.datacenterdynamics.com/en/analysis/the-ongoing-impact-of-amsterdams-data-center-moratorium/>

Government of the Netherlands (2019, June 28). Klimaatakkoord. <https://www.rijksoverheid.nl/documenten/2019/06/28/klimaatakkoord>

Government of the Netherlands (2025, March 14). Klimaatplan 2025-2035: Op weg naar een klimaatneutraal Nederland.

<https://www.rijksoverheid.nl/documenten/2025/03/14/minvkgg-klimaatplan-2025-2035>

Government of the Netherlands. (n.d.). Mitigating climate change.

<https://www.government.nl/themes/nature-and-the-environment/climate-change/mitigating-climate-change>

Green Film. (2022). TV 2 Danmark & Green Film.

<https://www.green.film/news/tv-2-danmark-green-film/>

Green Film Making. (2014, October 3). Breakthrough: The Netherlands Film Fund facilitating Sustainability Manager for the Dutch film industry.

<https://greenfilmmaking.com/2014/10/breakthrough-the-netherlands-film-funds-facilitating-sustainability-manager-for-the-dutch-film-industry/>

Green Film Shooting. (2022, February 12). Sustainability in the Swedish film industry.

<https://greenfilmshooting.net/blog/en/2022/02/12/sustainability-in-the-swedish-film-industry/>

Green Film Tourism. (n.d.). Idea. <https://greenfilmtourism.eu/o-projekcie/idea/>

Greenberg Traurig. (2024, March 4). Challenges in the Dutch data center market.

<https://www.gtlaw.com/en/insights/2024/3/challenges-in-the-dutch-data-center-market>

GreenTechnFilmFestival. (n.d.). Program. <https://greentechfilmfestival.ro/program>

Hållbar Film. (n.d.). New collaboration improves sustainability in Swedish film industry.

<https://hallbarfilm.se/english/>

Harryvan, D. H. (2022). Power management guide for data centers (Version 1.3). Certios B.V., commissioned by the Netherlands Enterprise Agency (RVO). <https://www.rvo.nl/files/file/2022-04/Guide%20Power%20Management%20for%20Data%20Centers%20-%20English.pdf>

Heidsiek, B. (2022, February 16). The EFM tackles carbon calculators, green production and training. Cineuropa. <https://cineuropa.org/en/newsdetail/422062/>

Idiz, D. R., Irion, K., Ebberts, J., & Vliegthart, R. (2021). European audiovisual media policy in the age of global video on demand services: A case study of Netflix in the Netherlands. *Journal of Digital Media & Policy*, 12(3), 425-449. https://doi.org/10.1386/jdmp_00070_1

- Interreg Europe. (2022, August 11). The European Environmental Calculator (Eureca) for AVP.
<https://www.interregeurope.eu/good-practices/the-european-environmental-calculator-eureca-for-avp>
- Ioanid, A., & Iliescu, D. (2024). Sustainability and Profitability in the Streaming Industry. IEEE Access, PP, 1-1. <https://doi.org/10.1109/ACCESS.2024.3470511>
- IPF7 Consortium. (n.d.). WB18-MKD-TRA-01 ESIA Study: Annex 1 - Legal Framework. <https://roads.org.mk/wp-content/uploads/2023/03/Annex-4-Legal-Framework.pdf>
- Istrate, R., Tulus, V., Grass, R. N., Vanbever, L., Stark, W. J., & Guillén-Gosálbez, G. (2024). The environmental sustainability of digital content consumption. Nature Communications, 15(1), 3724. <https://doi.org/10.1038/s41467-024-47621-w>
- Jancovic, M., & Keilbach, J. (2023). Streaming against the Environment: Digital Infrastructures, Video Compression, and the Environmental Footprint of Video Streaming. In K. van Es & N. Verhoeff (Éds.), Situating Data (p. 85-102). Amsterdam University Press. <https://www.jstor.org/stable/jj.362382.9>
- Jessen, J. (2024). Is Netflix Succeeding in Making Streaming Greener?. Sustainability Magazine. <https://sustainabilitymag.com/articles/is-netflix-succeeding-in-making-streaming-greener>
- Judge, P. (2019, July 16). Amsterdam says no more new data centers. Data Center Dynamics. <https://www.datacenterdynamics.com/en/news/amsterdam-pauses-data-center-building/>
- Kääpä, P. (2018). Environmental management of the media: Policy, industry, practice. Routledge. <https://doi.org/10.4324/9781315625690>
- Kääpä, P. & Vaughan. (2022). Introduction: Film and Television Production in the Era of Accelerated Climate Change - A Greener Screen? In: H. Kääpä, P., & Vaughan, H. (Éds.). (2022). Film and Television Production in the Age of Climate Crisis : Towards a Greener Screen. Springer International Publishing. <https://link.springer.com/10.1007/978-3-030-98120-4>
- Kääpä, P., & Vaughan, H. (2025). Greening European film policy : Towards a sustainable film, television, and screen media industry. University of Warwick. <https://wrap.warwick.ac.uk/187898/>

- KEA European Affairs. (2024). Carrying out a benchmarking study on support for the green transition of the cinema industry in the EU.
- Keilbach, J. (2025). (Non)Knowing the Environmental Impact of Video Streaming: Complexity, Transparency, and Corporate Sustainability Reporting. *Media Industries*, 12(1), 231-251.
- Keinonen, H., Sarikakis, K., Tinen, P., Rossato Fernandes, M., Vlassis, A., Bissot, P., Houard, S., Goffredo, S., Dâmaso, M., Ranaivoson, H., & Komorowski, M. (2025). D1.1 PlaySCAPES: Set-the-Stage Report on Sustainable Climate Transition and VOD platforms. Horizon Europe project StreamSCAPES (ID: 101177811). <https://doi.org/10.5281/zenodo.17482790>
- Kemna, R., Wierda, L., Li, W., van der Boorn, R., van Elburg, M., Viegand, J., & Wu, A. (2020). ICT Impact Study. European Commission.
- KIPA (n.d.). About Us. <https://kipa.pl/en/kipa/o-nas/>
- KIPA (2020). Webinarium „Sustainable film production”. <https://kipa.pl/webinarium-sustainable-film-productions-7-sierpnia/>
- KIPA (2021a). Film Dla Klimatu - Manifest. <https://kipa.pl/film-dla-klimatu-manifest/>
- KIPA (2021b). Rusza Inicjatywa Film Dla Klimatu. <https://kipa.pl/rusza-inicjatywa-film-dla-klimatu/>
- KIPA (2021c). Webinar z Birgit Heidsiek EKOLOGICZNA PRODUKCJA FILMOWA 28 kwietnia. <https://kipa.pl/webinar-z-birgit-heidsiek-ekologiczna-produkcja-filmowa-28-kwietnia/>
- KIPA (2021d). Zielona Produkcja Filmowa W Polsce - Ankieta Do 28 Lutego. <https://kipa.pl/zielona-produkcja-filmowa-w-polsce-ankieta-do-14-lutego/>
- KIPA (2022a). Konferencja planet placement gdynia 14 września. <https://kipa.pl/konferencja-planet-placement-gdynia-14-wrzesnia/>
- KIPA (2022b). Laboratorium zielonej produkcji audiowizualnej - zapisy od 14 września. <https://kipa.pl/laboratorium-zielonej-produkcji-audiowizualnej-zapisy-od-14-wrzesnia/>
- KIPA (2022c). Nagroda „klimatyczny film” - nabór zgłoszeń do 4 września. <https://kipa.pl/nagroda-klimatyczny-film-nabor-zgloszen-do-28-sierpnia/>
- KIPA (2022d). Przewodnik po zrównoważonej produkcji filmowej i telewizyjnej. <https://kipa.pl/przewodnik-po-zrownowazonej-produkcji-filmowej-i-telewizyjnej-premiera-w-dzien-ziemi/>

- KIPA (2022e). Rok działalności filmu dla klimatu.
<https://kipa.pl/rok-dzialalnosci-filmu-dla-klimatu/>
- KIPA (2023a). 15 lat Regionalnych Funduszy Filmowych!
<https://kipa.pl/15-lat-regionalnych-funduszy-filmowych/>
- KIPA (2023b). Dwa lata działalności filmu dla klimatu.
<https://kipa.pl/dwa-lata-dzialalnosci-filmu-dla-klimatu/>
- KIPA (2023c). Eco-consultants and Ambassadors for Green Audiovisual Production 2023.
<https://kipa.pl/en/eco-consultants-and-ambassadors-for-green-audiovisual-production/>
- KIPA (2024). Webinar: kalkulator śladu węglowego Green Shooting.
<https://kipa.pl/webinar-kalkulator-sladu-weglowego-green-shooting/>
- KIPA (2025a). Laureaci nagrody Film dla klimatu 2025.
<https://kipa.pl/laureaci-nagrody-film-dla-klimatu-2025/>
- KIPA (2025b). Webinar: Europejskie standardy zrównoważonej produkcji | 10 października.
<https://kipa.pl/webinar-europejskie-standardy-zrownowazonej-produkcji-10-pazdziernika/>
- Kopeć, K., Kotlińska, M., Materska-Samek, M., & Sobocińska, M. (2024). Humanistic Approach Toward Environmental Issues in Public Film Policies. In A. Konior, K. Kopeć, A. Góral, & K. Ogunyemi (Éds.), *Humanistic Management in the Public Sector: Global Contexts and Perspectives* (p. 167-187). Springer Nature Switzerland.
https://doi.org/10.1007/978-3-031-73522-6_8
- Kopeć, K., & Materska-Samek, M. (2023). Green filming in Poland : An interplay between necessity, environmental responsibility and green incentives.
<https://doi.org/10.33119/EEIM.2023.68.4>
- Kuczerawy, A. & Wauters, E. (2026). Monitoring media pluralism in the European Union: results of the MPM2026. Country report: Belgium. European University Institute.
<https://op.europa.eu/en/publication-detail/-/publication/c9da5ba5-75bf-11f1-bf5e-01aa75ed71a1/language-en>
- Kultur Ministeriet. (2023). Filmaftale for 2024-2027: En stærk filmnation.
https://kum.dk/fileadmin/_kum/1_Nyheder_og_presse/2023/Filmaftale_2024-2027.pdf
- L'Info Durable. (2024, January 4). Le cinéma se met au vert : depuis le 1er janvier 2024, les aides du CNC sont « éco-conditionnalisées ».
<https://www.linfordurable.fr/culture/depuis-le-1r-janvier-2024-les-aides-du-cnc-sont-eco-conditionnalisees-42962>

- Law on Audio and Audiovisual Media Services. (2013). Official Journal of the Republic of Macedonia, No. 184, 26 December 2013. https://avmu.mk/wp-content/uploads/2017/05/Law_on_Audio_and_Audiovisual_Media_Services_as_published_in_Official_Journal.pdf
- Le Roy, M. (2024, June 2). Le DSA et les services audiovisuels. Droit du cinéma. Retrieved August 26, 2026 <https://www.droitducinema.fr/DSA.html>
- Lewis, R. H., & Conway, A. (2024, juillet 9). Streaming the future of sustainability. HotCarbon'24, Santa Cruz.
- Lobato, R. (2019). The Infrastructures of Streaming. In Netflix Nations (Vol. 28, p. 73-105). NYU Press. <https://www.jstor.org/stable/j.ctv12pnnk3.7>
- Łódź Film Commission (n.d.a). Baza ekodostawców. <https://ec1lodz.pl/lodz-film-commission/baza-ekodostawcow>
- Łódź Film Commission (n.d.b). Film dla klimatu. <https://ec1lodz.pl/lodz-film-commission/zielone-inicjatywy/film-dla-klimatu>
- Łódź Film Commission (n.d.c). Szkolenia i certyfikaty. <https://ec1lodz.pl/lodz-film-commission/zielone-inicjatywy/szkolenia-i-certyfikaty>
- Loi n° 2021-1485 du 15 novembre 2021 visant à réduire l'empreinte environnementale du numérique en France. (2021). Journal officiel de la République française, n° 0266, 16 novembre 2021. https://www.legifrance.gouv.fr/download/pdf?id=rRP3me9F81tH5smQQT0p92tc_Fh71x9KoG_z3damffY=
- Loi n° 2021-1104 du 22 août 2021 portant lutte contre le dérèglement climatique et renforcement de la résilience face à ses effets. (2021). Journal officiel de la République française, n° 0196, 24 August 2021. <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000043956924>
- Lopera-Mármol, M., & Jiménez-Morales, M. (2021). Green Shooting : Media Sustainability, A New Trend. Sustainability, 13(6), 3001. <https://doi.org/10.3390/su13063001>
- Lov nr. 186 af 12. marts 1997 om film. <https://www.wipo.int/wipolex/en/legislation/details/7949>
- Lovi, S. (2025). How Disinformation Can Influence a Nation : The Case of Romania. Studia i Analizy Nauk o Polityce, (1), 27-44. <https://doi.org/10.31743/sanp.18466>
- Maki, N., Arsani, A., & Roussel, N. (2026, mai). Romania in the Context of Global Megatrends and Uncertainties for Green Growth [EPG Policy Papers].

https://www.epg-thinktank.org/wp-content/uploads/2026/05/Romania-in-the-Context-of-Global-Megatrends-and-Uncertainties-for-Green-Growth_Final-for-Publishing-2-1.pdf

Marks, L. U., Makonin, S., Przedpełski, R., & Rodriguez-Silva, A. (2021). Tackling the carbon footprint of streaming media. Social Sciences and Humanities Research Council. <https://www.sfu.ca/sca/projects--activities/streaming-carbon-footprint.html>

Marks, L. U., & Przedpełski, R. (2022). The Carbon Footprint of Streaming Media : Problems, Calculations, Solutions. In P. Kääpä & H. Vaughan (Éds.), Film and Television Production in the Age of Climate Crisis (p. 207-234). Springer International Publishing. https://link.springer.com/10.1007/978-3-030-98120-4_10

Mediemyndigheten. (n.d.). Regler för stöd till medier. <https://mediemyndigheten.se/stod-till-medier/regler-stod-till-medier/>

Meyer, J., Nico, T., Burguburu, A., Rigal, M., Lizon, B., Genin, L., Catalan, C., & Adam, I. (2022). Evaluation de l'impact environnemental de la digitalisation des services culturels. ADEME.

Ministère de la Culture. (2023, March 6). France 2030 : Lancement d'un appel à projets « Alternatives vertes 2 » doté de 25 millions d'euros pour accélérer la transition écologique de la culture. <https://www.culture.gouv.fr/presse/communiqués-de-presse/France-2030-Lancement-d-un-appel-a-projets-Alternatives-vertes-2-Dote-de-25-millions-d-euros-pour-accelerer-la-transition-ecologique-de-la-cu>

Ministerul Culturii. (n.d.). Prezentare Ministerul Culturii. <https://www.cultura.ro/despre-minister-2023/>

Ministerul Energiei (2025). Planul național integrat în domeniul energiei și schimbărilor climatice 2021-2030 actualizare. https://energie.gov.ro/wp-content/uploads/2025/10/PNIESC-2021-2030-actualizat_14.10.2025.pdf

Ministry of Environment and Physical Planning (2005). Law on Environment. https://cdn.climatepolicyradar.org/navigator/MKD/2005/law-on-environment_8f4f8989c4987d2bb6241ba96756b938.pdf

Møller, R. M., Frøhmorgen, T., & Søndergaard, D. B. (2025). Toolbox for Green Innovation—A Practical Guide for Film Professionals. Crescine. <https://doi.org/10.60543/RVEB-V503>

Munch, E. (2025). Green transition in the audiovisual sector. European Audiovisual Observatory.

Netherlands Film Fund (NFF) (2014, November 11). Netherlands Film Fund leads towards a greener film industry.
<https://www.filmfonds.nl/en/updates/netherlands-film-fund-leads-towards-a-greener-film-industry>

Netherlands Film Fund (NFF) (2025). General Regulations of the Netherlands Film Fund.
<https://assets.filmfonds.nl/Netherlands-Film-Fund-General-Regulations-2025.pdf>

Netherlands Film Fund (NFF) (n.d.a). Over het Fonds.
<https://www.filmfonds.nl/over-het-fonds>

Netherlands Film Fund (NFF) (n.d.b). Rules and Regulations.
<https://www.filmfonds.nl/en/rules-and-regulations>

Nhi, D., Chuloy, M., & Glomann, L. (2024). Environmental Impact of Video Streaming from Users' Perspectives. AHFE International.

Nielsen, J. I. (n.d.). Denmark. CresCine.
<https://www.crescine.eu/small-film-industries/denmark>

Nordic-Baltic Program for Civil Servants and Public Institutions (NB8-Grants). (n.d.). Success stories. Nordic Baltic Program for Civil Servants and Public Institutions.
<https://www.nb8grants.org/success-stories>

Nordic-Baltic Program for Civil Servants and Public Institutions (NB8-Grants) (2025, December 17). Building a green future for Nordic-Baltic audiovisual production.
<https://www.nb8grants.org/success-stories?start=0#>

Nordic Ecological Standard (NES). (2026). NES - Frequently Asked Questions.
<https://static1.squarespace.com/static/65eace5714ad06251b41ddb1/t/699ed6e646f9de0cbf1a4684/1772017382874/NES+FAQ+20260225.pdf>

Nordisk Film & TV Fond (NFTVF). (n.d.). Nordic Ecological Standard.
<https://nordiskfilmogtvfond.com/pages/nordic-ecological-standard>

Nordisk Film & TV Fond (NFTVF). (2025a). Good Green News from the Nordics presented in Berlin. Nordisk Film & TV Fond.
<https://nordiskfilmogtvfond.com/news/stories/good-green-news-from-the-nordics-presented-in-berlin>

Nordisk Film & TV Fond (NFTVF) (2025b). Guidelines 2025.
https://nordiskfilmogtvfond.com/assets/download/Guidelines_2025_English.pdf

Nordisk Film & TV Fond (NFTVF). (2025c, September 11). The Nordic Ecological Standard for film and TV-production is now supported by 34 organisations in the region.

<https://nordiskfilmogtvfond.com/news/stories/the-nordic-ecological-standard-for-film-and-tv-production-is-now-supported-by-34-organisations-in-the-region>

Nordic Films Commission. (2023). The Nordic Film Commissions Sustainability Pledge. <https://nordicfilmcommissions.com/sustainability-pledge>

Ó Fathaigh, R. (2021). [NL] Media Act amended to incorporate the revised AVMS Directive 2018. IRIS Legal Observations of the European Audiovisual Observatory, 2021-1, 1/24. <https://merlin.obs.coe.int/article/9053>

Österreichisches Filminstitut (ÖFI) (n.d.a). Green Filming Department. <https://filminstitut.at/en/green-filming/green-filming-department>

Österreichisches Filminstitut (ÖFI) (n.d.b). Green Filming & Funding <https://filminstitut.at/en/application-manager/green-filming-funding>

Österreichisches Filminstitut (ÖFI) (n.d.c). Guidelines. <https://filminstitut.at/rechtliches/richtlinien>

Österreichisches Filminstitut (ÖFI) (n.d.d). Tasks and Aims. <https://filminstitut.at/en/about-us/tasks-and-aims>

Österreichisches Filminstitut (ÖFI) (n.d.e). The Common Green Thread - The Development Of The Synergy Model Green Filming Austria And Green Filming & Funding ÖFI And ÖFI+. <https://filminstitut.at/en/green-filming/green-report/the-green-thread>

Österreichisches Filminstitut (ÖFI) (2023). Green Filming 2023. https://filminstitut.at/wp-content/uploads/2025/05/2023_OeFI_Annual-Report-GREEN-FILMING-en.pdf

Österreichisches Umweltzeichen. (n.d.a). Film Productions. <https://www.umweltzeichen.at/en/culture/film-productions>

Österreichisches Umweltzeichen. (n.d.b) Green Producing: New Requirements for Film and TV Productions. <https://www.umweltzeichen.at/de/kultur/filmproduktion/green-producing-neue-anforderungen-an-film-und-tv-produktionen>

Ottone Ramírez, E. R. & UNESCO (Éds.). (2025). Culture : The missing SDG. United Nations Educational, Scientific and Cultural Organization (UNESCO). <https://doi.org/10.58337/REJU6051>

Pan, S. (2024, January 24). The Netherlands Film Fund furthers efforts to encourage more sustainable productions. Cineuropa. <https://cineuropa.org/en/newsdetail/455411>

- Paul und Kollegen Consulting. (2025). Evaluation of FISApplus under inclusion of ÖFI+. https://filminstitut.at/wp-content/uploads/2025/07/Endbericht_FISApplus_und_OEFI.pdf
- People's Party for Freedom and Democracy (VVD), Christian Democratic Alliance (CDA), Democrats '66 (D66), & Christian Union (CU). (2017). Confidence in the future: 2017-2021 coalition agreement. <https://www.government.nl/binaries/government/documenten/publications/2017/10/10/coalition-agreement-confidence-in-the-future/coalition-agreement-2017-confidence-in-the-future.pdf>
- Pellicam Film Festival. (n.d.). www.pellicam.ro
- Pendergrass, K. L., Sampson, W., Walsh, T., & Alagna, L. (2019). Toward Environmentally Sustainable Digital Preservation. *The American Archivist*, 82(1), 165-206.
- Philipsen, H., Mosberg Iversen, S., & Leivdal Hagensen, S. (2024). Green Media Production Development. SDU. <https://www.visiondenmark.dk/innovationsprojekt-baeredygtig-omstilling-i-udviklingen-a-f-medieindhold/>
- PMCG. (2023, November 6). Towards a sustainable, diverse and safe media sector in North Macedonia. <https://pmcg-i.com/towards-a-sustainable-diverse-and-safe-media-sector-in-north-macedonia/>
- Polski Instytut Sztuki Filmowej (PISF). (n.d.). O nas. <https://pisf.pl/o-nas/>
- Pomerantz, D., Cook, G., & Rohrbach, K. (2015). Click Clean Scorecard: Key findings & Scores Explained.
- Portal Samorządowy. (2024). MKiDN: Zmiany w systemie wsparcia produkcji audiowizualnych; uwzględniliśmy koszty związane z ekologią. <https://www.portalsamorzadowy.pl/finanse/mkidn-zmiany-w-systemie-wsparcia-produkcji-audiowizualnych-uwzglednilismy-koszty-zwiazane-z-ekologia.584281.html>
- Producentforeningen. (2025a). Producentforeningen bakker op om ny Nordic Ecological Standard. <https://pro-f.dk/medlemsorientering/producentforeningen-bakker-op-om-ny-nordic-ecological-standard>
- Producentforeningen. (2025b). Producentforeningens strategi 2025-26. <https://pro-f.dk/projekter/producentforeningens-strategi-2025-26>

- PwC France. (2025, December 16). Modification de la CSRD. <https://www.pwc.fr/fr/publications/2025/12/modification-de-la-csrd.html>
- QuotaClimat (n.d.). La Belgique lance un Baromètre de l'Information Environnementale avec QuotaClimat. <https://quotaclimat.org/actualites/la-belgique-barometre-information-environnementale-quotaclimat/>
- Raszkowski, A., & Bartniczak, B. (2019). On the road to sustainability: Implementation of the 2030 Agenda Sustainable Development Goals (SDG) in Poland. *Sustainability*, 11(2), 366. <https://doi.org/10.3390/su11020366>
- Région Nouvelle-Aquitaine. (2026). Règlement d'intervention du Fonds de soutien à la création et à la production pour le cinéma et l'audiovisuel. https://les-aides.nouvelle-aquitaine.fr/system/files/specific_pj_files/RI_FDS_Cine_Audio_visuel_2026.pdf
- Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.328.01.0001.01.ENG&toc=OJ:L:2018:328:TOC
- Rijksdienst voor Ondernemend Nederland (RVO). (n.d.). Rapportageplicht energie-efficiëntie datacentra. <https://www.rvo.nl/onderwerpen/energiebesparingsplicht/eed-auditplicht/rapportageplicht-datacentra>
- Rozporządzenie Ministra Kultury i Dziedzictwa Narodowego z dnia 30 października 2024 r. zmieniające rozporządzenie w sprawie szczegółowego wykazu polskich kosztów kwalifikowalnych, parametrów utworów audiowizualnych oraz dokumentów związanych z przyznawaniem wsparcia finansowego na produkcję audiowizualną przez Polski Instytut Sztuki Filmowej. Czytaj więcej w Systemie Informacji Prawnej. https://sip.lex.pl/akty-prawne/dzu-dziennik-ustaw/zmiana-rozporzadzenia-w-sprawie-szczegolowego-wykazu-polskich-kosztow-22068777?utm_
- Rundfunk und telekom regulierungs (RTR). (n.d.1). Die KommAustria. https://www.rtr.at/medien/wer_wir_sind/KommAustria/KommAustria.de.html
- Rundfunk und telekom regulierungs (RTR). (n.d.2). Regulierungsumfeld. https://www.rtr.at/medien/was_wir_tun/mediendienste/regulierungsumfeld/regulierungsumfeld.de.html
- Sarikakis, K., Dâmaso, M., Lähdesmäki, T., Ramos Arenas, F., Vlassis, A. (2026). [The Governance of Competitiveness in the European Film Industry: A Reader](#). Palgrave.

- Scholten, A., IJkelstam, A., Brüne, T., & IJspeert, J. P. (2022, November 23). Netherlands prohibits creating hyperscale data centres until national guidelines are passed. CMS. https://cms.law/en/nld/legal-updates/netherlands-prohibits-creating-hyperscale-data-centres-until-national-guidelines-are-passed#utm_campaign=redirect_law-now
- Screen Flanders (n.d.). <https://www.screenflanders.be/>
- Screen Flanders (n.d.). About us. <https://www.screenflanders.be/en/about-us>
- screen.brussels (n.d.a). Eco-filming. <https://screen.brussels/en/eco-filming>
- screen.brussels (n.d.b). <https://screen.brussels/>
- Seeliger, R., Pham, S., Arbanowski, S., & Steglich, S. (2024). Empowering a greener future : Strategies for Sustainable Video Streaming and Energy Efficiency. Proceedings of the 3rd Mile-High Video Conference on Zzz, 82-83. <https://doi.org/10.1145/3638036.3640241>
- Sénat. (2023, May 17). Financement public du cinéma (Rapport d'information n° 610, 2022-2023). <https://www.senat.fr/rap/r22-610/r22-6104.html>
- Sharma, P., & Dash, B. (2022). The Digital Carbon Footprint : Threat to an Environmentally Sustainable Future. International Journal of Computer Science and Information Technology, 14(03), 19-29. <https://doi.org/10.5121/ijcsit.2022.14302>
- Sørensen, I. E., & Noonan, C. (2022). Production, policy and power : The screen industry's response to the environmental crisis. Media, Culture & Society, 44(1), 172-184. <https://doi.org/10.1177/01634437211065697>
- Sörensson, A., & Ghannad, N. (2025). Goal 13 : Climate Action - The Case of Netflix. In A. Sörensson & N. Ghannad (Éds.), Agenda 2030 and its Sustainable Development Goals : Successful Innovations from International Businesses (p. 197-209). Springer Nature Switzerland. https://doi.org/10.1007/978-3-031-49597-7_13
- SPF Finances. (n.d.). Tax Shelter - production audiovisuelle. https://finances.belgium.be/fr/entreprises/impot_des_societes/avantages_fiscaux/tax-shelter-production-audiovisuelle#q4
- StepUp Map. (2026). Romania. <https://stepup-map.pages.dev/embed/map?lng=en&country=Romania>
- Stowarzyszenie Filmowców Polskich (SFP) (n.d.). Regionalne Fundusze Filmowe. <https://www.sfp.org.pl/2016/wydarzenia,171,7513,0,1,Regionalne-Fundusze-Filmowe.html>

- Suski, P., Pohl, J., & Frick, V. (2020). All you can stream: Investigating the role of user behavior for greenhouse gas intensity of video streaming. Proceedings of the 7th International Conference on ICT for Sustainability, 128-138. <https://doi.org/10.1145/3401335.3401709>
- Svennevig, B. (2023). New research project aims to help the film and TV industry become greener. University of Southern Denmark. <https://www.sdu.dk/en/forskning/sdu-climate-cluster/news/green-film-production>
- Swedish Energy Agency (n.d.). Data centre energy performance reporting. <https://www.energimyndigheten.se/en/climate/climate/data-centre-energy-performance-reporting/>
- Swedish Environmental Protection Agency. (2025, October 1). Sweden's Climate Act and Climate Policy Framework. <https://www.naturvardsverket.se/en/topics/climate-transition/sveriges-klimatarbete/swedens-climate-act-and-climate-policy-framework/>
- Swedish Film Institute. (2024a, April 26). Mission and organisation. <https://www.filminstitutet.se/en/about-us/swedish-film-institute/mission-and-organisation/>
- Swedish Film Institute. (2024b, October 30). Regional Film Resource Centres throughout Sweden. <https://www.filminstitutet.se/en/about-us/swedish-film-institute/regional-film-resource-centres/>
- Swedish Film Institute. (2026a, February 25). Filminstitutet börjar tillämpa gemensam nordisk miljöstandard för film- och tv-produktion. <https://pressroom.filminstitutet.se/pressreleases/filminstitutet-boerjar-tillaempa-gemensam-nordisk-miljoestandard-foer-film-och-tv-produktion-3434007>
- Swedish Film Institute. (2026b, February 3). Nordic Ecological Standard - NES. <https://www.filminstitutet.se/sv/sok-stod/snabblankar/nordic-ecological-standard/>
- Teichmann, R., & Murschetz, P. C. (2018). Exploring the "Ecosystem" and Principles of Austria's Film Subsidy Schemes: Is Austria a "Best-Practice" Model for a Successful Film Policy? In P. C. Murschetz, R. Teichmann, & M. Karmasin (Éds.), Handbook of State Aid for Film: Finance, Industries and Regulation (p. 251-271). Springer International Publishing. https://doi.org/10.1007/978-3-319-71716-6_15
- The Five Nordics. (n. d.). Nordic Ecological Standard - NES. <https://www.thefivenordics.com/nesc>

- TV2. (n.d.). Bæredygtig produktion.
<https://producent.tv2danmark.dk/baeredygtig-produktion/>
- UNESCO. (n.d.). Incentive Model for Austria as a film location. Diversity of Cultural expressions - Policy Monitoring Platform.
<https://www.unesco.org/creativity/en/policy-monitoring-platform/incentive-model-austria-film-location>
- UNESCO. (2023). UNESCO World Conference on Cultural Policies and Sustainable—MONDIACULT 2022.
<https://www.unesco.org/en/articles/unesco-world-conference-cultural-policies-and-sustainable-development-mondiacult-2022>
- UNICEF. (2022, March). Knowledge, attitudes and practices study on climate change and the environment: General public.
<https://www.unicef.org/northmacedonia/reports/knowledge-attitudes-and-practices-study-climate-change-and-environment-teachers>
- UnitedGroup. (2022). Sustainability report 2022.
<https://united.group/wp-content/uploads/2024/05/UG-Sustainability-Report-2022.pdf>
- United Nations Framework Convention on Climate Change. (2015). Paris Agreement. United Nations.
- United Nations in North Macedonia. (n.d.). <https://northmacedonia.un.org/en>
- United Nations. (n.d.). Sustainable Development Goals.
<https://www.un.org/sustainabledevelopment/>
- Ustawa z dnia 30 czerwca 2005 r. o kinematografii.
<https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20051321111>
- Utrecht University. (2021, May 18). Hoe maken we de Nederlandse filmindustrie een stukje groener?
<https://www.uu.nl/nieuws/hoe-maken-we-de-nederlandse-filmindustrie-een-stukje-groener>
- Vacariu, M. (2024). Manipulation and Disinformation in the 2024 Romanian Presidential elections. International Conference RCIC'25.
- Vlaams Audiovisueel Fonds (VAF) (n.d.a). Tools voor duurzame filmproductie.
<https://www.vaf.be/voor-de-sector/duurzaamheid/duurzame-filmproductie>
- Vlaams Audiovisueel Fonds (VAF) (n.d.b). Wat moet je als aanvrager concreet doen?
<https://www.vaf.be/voor-de-sector/duurzaamheid/stappenplan-duurzaamheidswerking>

- Vlaamseregulator media (VRM) (n.d.). Frequently asked questions.
<https://www.vlaamseregulatormedia.be/en/frequently-asked-questions>
- Vodafone Group Plc. (2026). Annual Report 2026.
<https://reports.investors.vodafone.com/view/500231330/i/>
- Voices of Culture & Goethe Institut. (2023). Culture & Creative Sectors & Industries driving Green Transition and facing the Energy Crisis.
https://ec.europa.eu/assets/eac/culture/docs/voices-of-culture/voices-of-culture-brains-forming-report-green-transition-2023_en.pdf
- Vulcan, D. (2021). Cinematografia românească, între colaps și promisiuni. Europa Liberă România.
<https://romania.europalibera.org/a/cinematografia-romaneasca-intre-colaps-si-promisiuni/31154454.html>
- Wallimage (n.d.). Wallimage. <https://www.wallimage.be/>
- Wallimage. (2023). Règlement général de financement d'œuvres audiovisuelles.
https://www.wallimage.be/wp-content/uploads/2023/08/wallimage_reglement_11052023-2-2.pdf
- Wallimage. (2025, December 19). Règlement 2026 : Une réforme concertée pour l'avenir de l'audiovisuel wallon.
<https://www.wallimage.be/news/reglement-2026-une-reforme-concertee-pour-lavenir-de-laudiovisuel-wallon/>
- Wantoch-Rekowski, J., & Czarnecki, K. (2024). Polish Film Institute: Selected Legal and Financial Aspects. Prawo Budżetowe Państwa i Samorządu, 11(3), 69-89.
<https://doi.org/10.12775/PBPS.2023.015>
- Widuto, A. (2024). Poland's climate action strategy. Roadmap to EU Climate Neutrality - Scrutiny of Member States. EPRS.
[https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/767168/EPRS_BRI\(2024\)767168_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/767168/EPRS_BRI(2024)767168_EN.pdf)

Annexes

Annexe 1: Questionnaire

Section 1: Introduction

1. Could you describe your role within your organisation?

Section 2: Culture and sustainability

2. The idea of a sustainable climate transition is increasingly discussed in the context of the cultural and creative industries. What does this mean to you? What do you see as its core elements?
3. In your opinion, what is the impact of the VOD sector and more broadly the audiovisual sector on the environment? Is it positive or negative?

Section 3: AV/VOD Regulation - Sustainability

4. What measures has your organisation implemented regarding sustainability in VOD or, if you don't have examples to focus on VOD, in the AV sector more broadly?
 - o [If the respondent is part of a film fund or similar funding body] Does your organisation apply sustainability criteria when granting funding or support? Alternatively, does it boost positive examples (for example, extra points given to funding applicants concerned with sustainability)?
 - o How effective do you think such incentives have been?
 - o Do you collaborate with other companies or regulators of the AV sector, including VOD platforms, to develop new environmental sustainability standards?
 - o Have you implemented any tools to measure the carbon footprint of the audiovisual sector or some of its elements?
5. Which stage of the value chain should be prioritised through policy actions to effectively support the SCT of the sector (e.g., production, distribution or consumption)?
6. Are there any other important regulations in your country/region that address the sustainability of VOD or the audiovisual sector? If so, how do you evaluate them?

7. More broadly, which types of instruments are most effective for promoting sustainability and climate transition in the VOD sector? Hard law, soft law, funding incentives, or other measures? At what level (local, national, EU, or other)?

Section 4: Enablers, gaps and challenges

8. Have you noticed any positive changes in the role of sustainability in policies about VOD or the AV sector in recent years? If yes, what explains these trends?
 - Do you have knowledge of or experience of working with Creative Europe and European funding? If so, what are your thoughts on the ways it embeds sustainability issues into its programmes? How could EU cultural and other policies be reinforced?
 - Has the work of the UN and its Sustainable Development targets played a role in supporting the implementation of such policies? Why/why not?
9. What are the main policy gaps in relation to the sustainable climate transition of the AV and VOD sector in your country? What are national or other authorities not doing yet?
10. If you had carte blanche, what would you do to speed up the contribution of VOD and the audiovisual sector to the sustainable transition?
11. What are the main limitations, obstacles, or challenges hindering the sustainable transition of the AV and VOD sectors in your organisation or country?

Section 6: 2.2. Industry practices

12. What role can VOD user interfaces and content curation play in encouraging more sustainable viewing habits and more sustainable attitudes and behaviour?
13. Which types of actions would be most needed by the sector to effectively support its sustainable climate transition (e.g., investments in R&D and in technology supporting green practices, training and upskilling, harmonised green standards, transparency obligations for external service providers, etc.)?

Conclusion:

14. Is there any important aspect we haven't touched on?

Annexe 2: Consent form

Information for participants and declaration of consent to participate in the study

Title of the study: Driving Sustainable Climate Transition of Video-On-Demand Platforms at a Time of Transformation (StreamSCAPES)

Dear participant,

We would like to invite you to participate in the study mentioned above.

Your participation in this study is voluntary. You can refuse to participate at any time, without having to give a reason, or withdraw your agreement to participate once the study has already started. There will be no negative consequences for you if you refuse to participate or if you withdraw from this study early.

This kind of study is necessary to gain new, reliable *academic* research results. However, your written consent to participate in the study is an indispensable prerequisite for us to conduct this study. Please take time to read the following information carefully, and do not hesitate to ask questions.

Please only sign the declaration of consent

- if you have fully understood the type and procedure of the study,
- if you are willing to give your consent to participate, and
- if you are aware of your rights as a participant in this study.

1. What is the purpose of this study?

StreamSCAPES explores the under-utilised strengths, existing challenges, and knowledge, practice, and policy gaps in the Video-on-Demand (VoD) services in Europe, which hinder or enable their sustainable climate transition (SCT).

StreamSCAPES focuses on four key dimensions of the SCT of VOD services in Europe:

- I - Industry and Professionals - examining production processes, business models, and professional practices and needs.
- II - Consumption and Everyday Practices - investigating user behaviour and patterns of media consumption, with an emphasis on youth.
- III - Institutions and Policies - analysing regulatory frameworks and governance structures.

IV - Narratives and Framings - exploring how SCT is communicated through audiovisual content.

StreamSCAPES acknowledges the growing importance of VOD platforms as central nodes within the Cultural and Creative industries (CCIs), representing a dynamic intersection of technology, business models, consumption habits, and cultural meaning-making. By focusing on the VOD services, StreamSCAPES offers meaningful insights into how production, consumption, and decision-making processes within the CCIs can actively contribute to and support the sustainable climate transition in Europe and abroad.

2. What is the procedure of the study?

The research is conducted in close collaboration with the European audiovisual industry to ensure its relevance. As part of this effort, the project organises several semi-structured interviews to provide data for various Work Packages, in particular Work Package 2 (Mapping). Interviews will be conducted online, will be recorded and transcribed.

3. What are the benefits of participating in the study?

The project provides new data about the SCT of VOD services in Europe for policy-makers as well as for industry professionals, public and private broadcasters, tech companies in cultural markets, and civil society associations. This means that as members of the stakeholders, you would be able to help shape the study and gain information that can be beneficial to you.

4. What are the possible risks of taking part in this study? Could participants experience any discomfort or other side effects?

Participants will not come across any discomfort or other side effects during the course of this study.

5. How will the data collected in this study be used?

The data will be pseudonymised whenever requested, which means that it is possible, with the help of additional information (typically with an identification key), to associate personal data with a person (see Art 4(5) General Data Protection Regulation). Pseudonymised data are within the remit of data protection laws. Your data will be pseudonymised (e.g. through the allocation of an ID number, under which the data will be saved). This way, those who do not have the “key” will not be able to deduce any information about your person.

Input will be analysed and will be used for reports and publications in an anonymous form, including quotes. Participants will never be identified by name or in any way that could allow them to be recognised. Audio or video recordings will remain accessible exclusively to the researchers.

6. Will there be any costs for the participants? Will they receive reimbursement or remuneration?

The participants will not receive contractual remuneration and they will not incur any costs from participating in this study.

7. Possibility to discuss further questions

Name(s) of the contact person(s):

Study coordinator	Name: Research Professor Antonios Vlassis E-mail: avlassis@uliege.be
Principal investigators	Name: Pauline Bissot E-mail: pauline.bissot@uliege.be Name: Solenn Houard E-mail: solenn.houard@uliege.be
University Data Protection Officer	E-mail: dpo@uliege.be Address: Université de Liège Data Protection Officer, Bât. B9 Cellule "GDPR", Quartier Village 3, Boulevard de Colonster 2, 4000 Liège, Belgique.

8. Declaration of consent

Name of the participant in block letters:

Date of birth:

I agree to participate in the study Driving Sustainable Climate Transition of Video-On-Demand Platforms at a Time of Transformation (StreamSCAPES).

ULIEGE Team has provided me with clear and detailed information about the objectives, significance and scope of the study, as well as about the requirements resulting from my participation in the study. In addition, I have read this information text for participants and the

declaration of consent, especially point 4 (regarding risks, discomforts or side effects). The study coordinator answered all my questions sufficiently and in a comprehensible manner. I had enough time to decide whether I would like to participate in this study. At the moment, I have no further questions.

I will follow the instructions that are necessary for conducting this study. However, I reserve the right to end my voluntary participation at any time, without this being to my disadvantage. If I want to withdraw from the study, I can do so at any time by contacting (Pauline Bissot, pauline.bissot@uliege.be or Solenn Houard, solenn.houard@uliege.be), either in writing or verbally.

At the same time, I agree that my data collected in this study are recorded and analysed.

I agree that my data are permanently saved electronically in pseudonymised form. Data that have not yet been pseudonymised are stored in a form accessible only to the project management team and are secured in accordance with current standards.

If I want my data deleted at a later time, I can arrange this by contacting Pauline Bissot (pauline.bissot@uliege.be) or Solenn Houard (solenn.houard@uliege.be), without having to give a reason.

I have read and understood the information for participants. In the explanatory meeting, I had the opportunity to ask all the questions I was interested in. My questions were answered fully and in a comprehensible manner.

I have received a copy of this information for participants and declaration of consent. The original remains with the study coordinator.

(Date and signature of the participant)

.....

Annexe 3: Typology of sustainable frameworks towards the AV-VOD sectors

Country	Name of policy initiative	Implementing authority	Type of measure	Brief description
Austria	UZ76 Austrian Ecolabel	Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology	Voluntary certification scheme (soft law)	Label covering all forms of audiovisual production. Requires compliance with ecological minimum standards. Valid for four years, awarded to the film itself. Only 11% of funded cinema productions currently apply. Link .
Austria	ÖFI funding	ÖFI	Eco-conditionality attached to public funding	From 2023, all productions receiving ÖFI reference or project development funding must meet at least 20 out of 26 ecological criteria, submit a green plan and hire a certified green consultant. Link .
Austria	ÖFI+	ÖFI	Eco-conditionality attached to public funding	Automatic funding scheme covering up to 30% of Austrian spending. Requires the same green criteria as traditional ÖFI funding. Extended to distribution and animation (from January 2025). Link .
Austria	ÖFI+ Green Bonus	ÖFI	Financial incentive	Additional 5% bonus on top of the 30% ÖFI+ grant for productions meeting stricter criteria

				based on UZ76, fulfilling at least 22 out of 26 criteria and passing a post-production audit. Link .
Austria	FISA+ Green Bonus	Ministry of Economy	Financial incentive	Additional 5% green bonus under FISA+ for productions meeting environmental conditions, on the 30% cash rebate on Austrian spending targeting TV and VOD streaming series, international service productions and post-productions. Link .
Austria	Green Filming Austria	Lower Austrian Film Commission and other institutions	Discussion groups	A national working group formed in 2019 bringing together 12 national and regional institutions to harmonise sustainable practices across the country. Link .
Austria	Green Filming Tirol	Cine Tirol	Training programme	Regional initiative focused on protecting biodiversity during mountain shoots, including the Touch Green training programme for production teams. Link .
Austria	Evergreen Prisma	Lower Austrian Film Commission	Knowledge sharing & training	Platform functioning as a think tank for sustainable filmmaking. Trains and certifies green consultants via the GFCA scheme. Leads European working groups including

				CO/PRO-EUROPE to harmonise sustainability regulations across borders. Link .
Austria	Film Promotion Act	Federal Government	Amendment, Hard law	inscribed the obligation to "create incentives for ecologically sustainable film production" into ÖFI's statutory objectives. Link .
Austria	2023 Film Location Act	Ministry of Economy	Hard law, new law	Created the FISA+ funding scheme and introduced sustainability promotion as a core pillar of Austria's strategy to attract foreign audiovisual productions. Link .
Belgium	Wallimage funding	Wallimage	Eco-conditionality attached to public funding	Since 2026, all projects funded by Wallimage must be certified in accordance with a recognised protocol. The certificate itself is not mandatory, but the production is required to demonstrate that it tried to obtain it. Failure to demonstrate sufficient effort results in a 10% reduction of the final funding. Link .
Belgium	VAF funding	VAF	Eco-conditionality attached to public funding	All VAF-supported feature films and series must follow a mandatory four-step sustainability process built around the EURECA eco-calculator. Non-compliance results in a 10% retention of the final funding allocation. Link .

Belgium	Sustainability support	Screen.brussels	Voluntary financial support	Recognises sustainability-related expenses (green consultants, carbon calculators, eco labels) as eligible costs. Link .
Belgium	Environmental Information Barometer	CSA and SPF Santé Publique	Monitoring instrument	Joint initiative announced at COP30 analysing the media treatment of environmental issues across Belgian radio and television news programmes. Link .
Belgium	Brussels "Exemplarity" Decree	Brussels-Capital Region	Regional regulatory instrument	Regional decree supporting companies contributing to social or environmental objectives, enabling them to claim financial advantages when seeking subsidies and regional aid. Link .
Denmark	Climate act	Danish government	Hard law	Legally binding commitment to a 70% reduction in GHG emissions by 2030 compared to 1990 levels, alongside a target of climate neutrality by 2050. Does not include sector-specific provisions for the audiovisual or VOD sector. Link .
Denmark	Green Film certification	TV2 Green Film Trentino	Voluntary certification instrument	Danish-language guide to align the Green Film certification developed by the Trentino Film Commission with the local industrial context. Link .

Denmark	BFTP (Sustainable Film and TV Production alliance)	Vision Denmark, DFI, Producers' Association, regional funds, DR, TV2, industry associations	Industry alliance	Alliance bringing together public and private audiovisual stakeholders to finance a gradual transition toward sustainable practices. Serves as Vision Denmark's working group on climate issues in film and TV. Link .
Denmark	Sustainability research project	Vision Denmark, University of Southern Denmark, Danish Agency for Higher Education and Science, TV2, Green Producers Club Denmark	Research and knowledge-building initiative	Research project active between September 2023 and December 2024, serving as the empirical foundation for strategic sustainability recommendations for the sector. Link .
Denmark	Danish Producers' Association sustainability commitment	Danish Producers' Association	Voluntary industry commitment	Recognition of sustainability as a key factor reshaping the Danish market, inscribed in the association's statutes. Link .
Denmark	DR mandatory sustainability guidelines for external productions	DR	Mandatory requirements for broadcasters	From 2024 onwards, DR requires all external productions to submit a sustainability plan and a pre-production climate budget, followed by a final carbon footprint assessment. Link .

Denmark	TV2 mandatory sustainability guidelines for external productions	TV2	Mandatory requirements for broadcasters	From January 2024, TV2 requires external producers to supply a sustainability plan and a CO ₂ budget before production begins, and a detailed carbon assessment upon completion. Link .
France	Plan Action!	CNC	Eco-conditionality attached to public funding	Funding films are required to measure and document their environmental footprint via a two-stage carbon assessment mechanism. Mandatory to access CNC funding since 2024. Link .
France	Ecoprod label	Ecoprod	Voluntary industry certification	Production label verified by an independent third party. Link .
France	Dotation Cofiloisirs	Cofiloisirs (subsidiary of a banking group)	Private financial incentive	Awards an additional €20,000 endowment to five Cofiloisirs clients whose productions achieve the highest environmental scores based on the Ecoprod calculator or label. Link .
France	Régional sustainability requirements	Regional film funds	Eco-conditionality attached to public funding	Several French film funds have incorporated sustainability requirements into their support schemes, often in line with the CNC's eco-conditionality framework. Link .

France	Alternatives Vertes programme	General Secretariat for Investment / CNC	Public funding programme	Aims to support the emergence of innovative and structuring green alternatives that are capable of sustainably transforming cultural practices across the entire value chain and finances the development of measurement tools, the upgrading of skills among stakeholders and the creation of training and awareness-raising programmes. Link .
France	REEN law	Federal government	Hard law, new law	Aimed at reducing the environmental footprint of digital technology. Extends the ecological transition to the entire digital sector, including streaming services and data centres. Imposes energy transparency and efficiency disclosure requirements on data centres and digital service providers. Link .
France	Climate and Resilience Law	Federal government	Hard law	Requires the regular assessment of the environmental impact of audiovisual media distribution, including energy consumption and GHG emissions associated with content consumption, devices, networks and data centres. Link .
Netherlands	Climate Act	Federal government	Hard law	Provides the framework for Dutch climate policy. It sets a target of reducing greenhouse gas emissions by 55% by 2030 compared with

				1990 levels and achieving climate neutrality by 2050. Link .
Netherlands	Climate Agreement	Federal government	Hard law	Translates national climate objectives into measures and commitments. Link .
Netherlands	Climate Plan	Federal government	Hard law	Translates national climate objectives into measures and commitments. Link .
Netherlands	Sustainability Manager	NFF	Support mechanism	Dedicated Sustainability Manager to promote environmentally sustainable filmmaking practices among beneficiaries. Link .
Netherlands	NFF sustainability support	NFF	Financial incentive	Dutch-majority productions can access a sustainability support package including up to €3,000 for sustainability-related expenses. Link .
Netherlands	NFF funding	NFF	Evaluation criteria	Sustainability is among criteria without making it a condition for project eligibility or final payment. Link .
Netherlands	NFF Special Contributions for	NFF	Financial incentive	Special Contributions to finance innovative projects in the field of diversity and sustainability. Link .

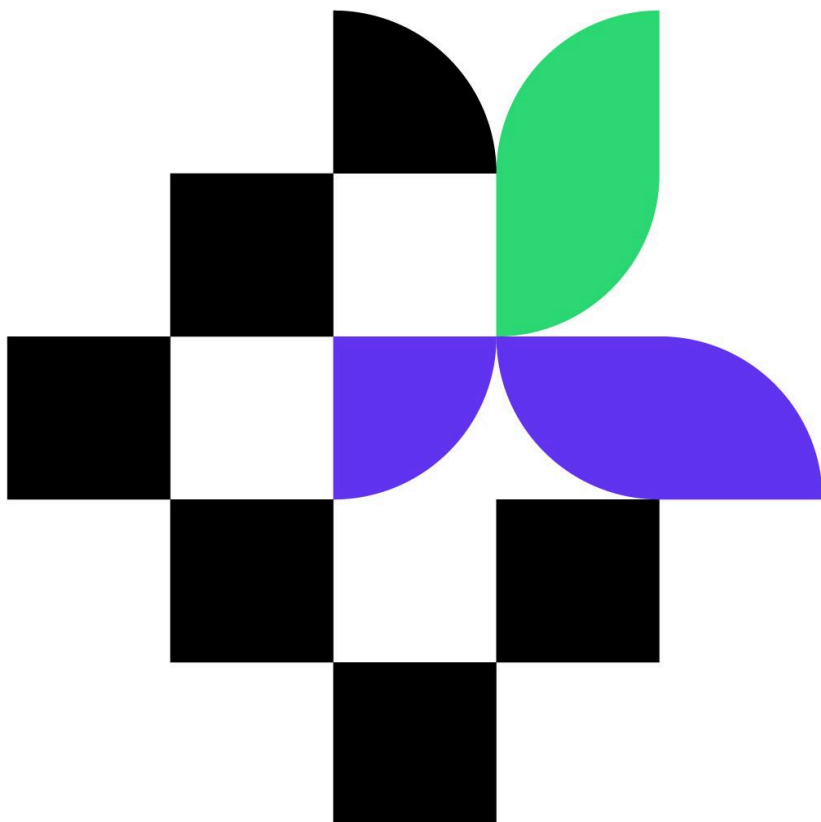
	sustainability and diversity			
Netherlands	Restriction on hyperscale data centres	Government and municipalities	Hard law	Restriction of the establishment of hyperscale data centres outside designated areas. Link .
North Macedonia	Law on the Environment	Ministry of Environment and Physical Planning	Hard law	Establishes the Environmental Impact Assessment system, integrated environmental permitting (A/B permits) for polluting installations, national and local environmental planning, and the competences of the MOEPP. Climate targets aligned with the EU's 55% GHG reduction target by 2030 are set out in this law. Link .
Poland	National Energy and Climate Plan	Polish government	NECP	In compliance with the European Climate Law. Link .
Poland	Film dla Klimatu	KIPA, Advertising Producers Club, Audiovisual Technology Centre and regional film commissions	Industry alliance	Informal cross-sector coalition established in 2020 to promote sustainable audiovisual production. It advocates for greener sectoral practices and produces knowledge-sharing resources, including reports and guidance on sustainable filming. Link .

Poland	Green audiovisual production training	KIPA and PISF	Training programme	Seminars and training activities on sustainable audiovisual production. Aims to develop professional knowledge and skills related to greener production practices. Link .
Poland	Eco-consultant and Green Audiovisual Production Ambassador certification	KIPA and PISF	Training programme	Certification programme launched in 2022 to train eco-consultants and Green Audiovisual Production Ambassadors. Link .
Poland	Climate Film Prize	Film dla Klimatu, KIPA and festival partners	Prize	Annual award presented at the Polish Feature Film Festival in Gdynia since 2022 to recognise productions applying environmentally sustainable practices. Link .
Poland	PISF funding	Ministry of Culture and National Heritage / PISF	Financial incentive	Eligible audiovisual production costs allows producers to claim financial support for sustainability-related expenses. Link .
Poland	Environmental sustainability knowledge portal	Wrocław Film Foundation	Knowledge -sharing initiative	Portal gathering information, guidance and good practices on environmental sustainability in audiovisual production. Link .

Poland	Reduction of regional spending	Krakow regional film support	Financial incentive	Productions may reduce the usual regional spending requirement from 150% to 130% when the remaining 20% is allocated to verified environmentally sustainable production costs. Link .
Poland	Łódź Film Funding	Łódź Commission Film	Eco-conditionality attached to public funding	Regional funding applications can receive additional points for presenting a sustainability plan. Link .
Poland	Łódź green production support	Łódź Commission Film	Financial and technical support	Supported productions can include environmental expenses in eligible regional costs. Link .
Poland	Łódź green production resources	Łódź Commission Film	Knowledge -sharing initiative	Database of eco-suppliers, sustainable production guides and other resources. Link .
Romania	EcoTIFF	Transylvania International Film Festival	Festival	Initiative developed within TIFF since 2019, including programming focused on environmental themes and broader efforts to integrate sustainability into festival activities. Link .

Romania	Guide on sustainability and green practices in the Romanian audiovisual production industry	Agenția pentru Dezvoltare Regională București-Ilfov	Guide	Best-practice guide for the industry, outlining voluntary measures for sustainable production. Link .
Romania	Green Tech & Film Festival	Media Image Factory	Festival	Festival held in Bucharest between 2017 and 2024, combining screenings and workshops on environmental and technological issues and promoting more sustainable practices. Link .
Romania	Pelicam Film Festival	Pelicam Association	Festival	Environmental film festival held in Tulcea between 2012 and 2021, dedicated to films and debates addressing ecological and environmental issues. Link .
Sweden	Climate Act 2017	Federal government	Hard law	Sets a national target of carbon neutrality by 2045, with an 85% reduction in emissions compared to 1990 levels. Provides the overarching legislative framework within which sectoral sustainability policies. Link .
Sweden	SFI Handbook on Sustainable Film Production	SFI	Guidance	Swedish adaptation of the existing European guide to sustainable production. Link .

Sweden	Regional sustainability requirements	Regional film funds	Eco-conditionality attached to public funding	Regional funds require supported productions to submit environmental plans and sustainability reports, using tools such as the Hållbar Film planning tool. Link .
Sweden	Swedish Environmental Code	Local and regional authorities	Hard law	Benchmark national environmental law incorporating EU environmental standards. Link .
Sweden	Hållbar Film	Local and regional authorities	Tool	Digital planning tool for producers. Link .
Nordics	Nordic Ecological Standard	SFI, Nordisk Film & TV Fond and Nordic film institutes	Eco-conditionality attached to public funding	Common standard developed in 2022 by the five Nordic countries, entering into force in January 2026. Link .



Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Research Executive Agency (REA). Neither the European Union nor the granting authority can be held responsible for them.