

**Recommendation on Combating online piracy of sports and other live events –
European Commission's call for evidence June 2025
LALIGA contribution**

- 1) To what extent have Member States and stakeholders made use of the measures set out in the Recommendation? This relates in particular to the recommendations to: (i) ensure prompt treatment of notices related to unauthorised retransmissions of live events, including through cooperation between providers of intermediary services and holders of rights in live events; (ii) ensure that holders of rights for live events are able to ask for injunctions, including before the start of the event, in a way that can tackle repeat infringements, and subject to appropriate safeguards; (iii) raise awareness on legal offers and increase their availability; and (iv) foster voluntary cooperation between national authorities to exchange information.**

As part of our ongoing commitment to combating online piracy, LALIGA has made significant progress in implementing the measures outlined in the Commission's Recommendation. LALIGA has concluded effective content removal agreements with 12 Hosting Services, Dedicated Server Providers (DSPs) and Content Delivery Network service providers operating in Europe. These agreements enable the takedown and blocking of unauthorized live content in less than 10 minutes and reflect an improvement in cooperation with key intermediaries. These 12 intermediaries represent approximately 15% of the 76 intermediaries we have identified across the EU. Our focus remains on expanding this network and strengthening the responsiveness of intermediaries to live content infringements. However, we have observed that the majority of intermediaries contacted are unwilling to cooperate and lack dedicated protocols to combat illegal live streaming.

In addition, LALIGA has successfully obtained a dynamic live blocking injunction in Spain against the country's main internet service providers (ISPs). This judicial measure allows for real-time blocking of infringing content and provides a framework to act proactively before the start of live events, especially against repeat infringers. The injunction includes advanced protective mechanisms such as the use of whitelists, ensuring legitimate content delivery is not disrupted. This tool has proven essential in safeguarding live broadcasts and is a clear example of a measure aligned with the Commission's Recommendation.

LALIGA actively participates in national and international working groups, sharing intelligence and best practices with public authorities and stakeholders across the EU, including the European Observatory on Infringements of Intellectual Property Rights and the European Multidisciplinary Platform Against Criminal Threats (EMPACT) and EUROPOL. We are committed to strengthening these collaborative efforts to improve enforcement and cross-border responses to digital piracy.

- 2) What have been the effects of these measures and what were the main barriers to their uptake?**

LALIGA has observed a positive impact from the enforcement measures implemented in line with the Commission's Recommendation, exclusively those related to live blocking injunctions and voluntary cooperation with intermediaries.

Thanks to the dynamic blocking injunction obtained in Spain on December 19th, 2024, LALIGA has been able to detect 10.365.471 IP addresses infringing LALIGA content from January till May



2025. However, it is noteworthy that these infringing IP addresses are concentrated in 38.451 unique IP addresses.

LALIGA has then issued between January and May 2025, 10.365.471 notices to Hosting Services, Dedicated Server Providers (DSPs) and Content Delivery Network service providers involved in the illegal broadcasting of LALIGA content. However, only 138.065 of the notices were processed (1.33%) and actually removed or blocked, primarily as a result of the collaboration agreements we have established with a number of content delivery networks (CDNs), digital service providers (DSPs), and hosting providers.

Main Barriers to Uptake:

Despite some positive effects, several important obstacles remain:

- Lack of cooperation from a significant portion of intermediaries, many of whom have not established protocols for addressing illegal live streaming or fail to respond to takedown requests in less than 10 minutes.
- The technical sophistication of piracy networks, including frequent use of obfuscation techniques, encrypted applications, IP rotation and fast-flux hosting, which complicates identification and takedown efforts.
- Fragmentation of enforcement across Member States, resulting in inconsistent levels of legal protection and procedural effectiveness.
- Limited cross-border enforcement mechanisms, which restrict the effectiveness of measures beyond national jurisdictions.

In summary, while the measures implemented by LALIGA have delivered some tangible results in reducing illegal access to its live content, a more adapted EU legal framework is required to tackle online piracy of live content.

3) To what extent has the Recommendation contributed to reducing the piracy of live events? To what extent have other (EU or national) policies and external factors affected the incidence of unauthorised retransmission of live events?

According to the [analysis](#) of Grant Thornton published on 4 March 2025, the Recommendation has had limited impact. The analysis shows concretely that:

- 10.8 million takedown notices relating to unauthorised retransmission of live events were submitted to intermediaries.
- Over 81% of these notices did not result in suspension of the illegal retransmission.
- Only 2.7% of infringements were acted upon within 30 minutes and 20% took over 120 minutes for action.
- Dedicated Server Providers received 52% of all notices submitted across 2024. 89% of these notices did not lead to suspension of the illegal retransmission. Of the notices submitted to Dedicated Server Providers, only 1% were submitted in line with a cooperation agreement. These have an 11% effectiveness in achieving suspension. While cooperation agreements can help improve the likelihood of



suspensions when correctly implemented, for Dedicated Server Providers complementary measures are clearly needed.

4) What have been the economic impacts, including possible costs (if any) of implementing the measures set out in the Recommendation for Member States and stakeholders – including service providers and rightsholders?

LALIGA has made a significant economic investment to implement the measures set out in the European Commission's Recommendation on combating the unauthorized retransmission of live events, recognizing the importance of an effective and coordinated approach to fighting online piracy.

For the 2024/2025 season, LALIGA has allocated close to €10 million specifically to support the deployment of these measures. This budget covers a wide range of strategic, operational and technical initiatives, including:

- Legal representation and litigation costs to obtain real-time, dynamic IP blocking injunctions against infringing content, particularly in Spain, which enable immediate action during live broadcasts.
- Development of proprietary technology to automate the communication of evidence and infringing content to Spanish Internet Service Providers (ISPs), ensuring real-time responsiveness.
- Establishment of cooperation agreements with key intermediaries, including hosting providers, content delivery networks (CDNs), among others.
- Creation of systems for mass real-time verification of illegal retransmissions of LALIGA content, allowing for faster detection and enforcement during live matches.
- Recruitment and training of specialized anti-piracy personnel to monitor, validate, and manage the proper execution of legal and technical anti-piracy actions.
- Engagement of external anti-piracy providers, intelligence services, and cybersecurity experts to complement internal efforts.
- Awareness and outreach campaigns targeting public authorities, regulatory bodies, and the general public, to increase understanding of the negative impact of piracy and the need for urgent enforcement.

These investments demonstrate not only LALIGA's commitment to protecting its audiovisual rights but also the economic burden that rightsholders must bear in the absence of harmonized, legal obligations for removal on intermediaries across the EU which are fit for live content.



5) Has the Recommendation proven consistent with EU legislation it builds on (Directive 2001/29/EC, the Digital Services Act and Directive 2004/48/EC)? What in particular has been the potential impact of the Digital Services Act in unauthorised retransmissions of live sports and other live events?

The Digital Services Act (DSA) is not helping LALIGA to combat unauthorized retransmissions of the competitions it organizes.

- The DSA does not include a legal obligation for intermediaries to take down the content notified by rightsholders immediately, and make sure it stays down.
- The DSA foresees in its recital 52 that *“providers of hosting services should act upon notices in a timely manner, in particular by taking into account the type of illegal content being notified and the urgency of taking action”*. However, the notion of ‘timely’ is too vague when it comes to live content. The same applies to the notion of expeditious removal foreseen in Article 6 of the DSA in relation to hosting services. Live content sectors need these notions of ‘timely’ and ‘expeditious’ to be clarified. The removal should be immediate upon the receipt of the notice by the intermediary.

6) Did the Recommendation respond to the needs of the relevant stakeholders? Do the measures set out in the Recommendation still address its initial objectives in an effective way, given technological, market and social developments?

From a technical and operational standpoint, the Recommendation published by the European Commission aligns well with the needs of LALIGA as a rightsholder of live sports content. The outlined measures, particularly the emphasis on rapid action, cooperation with intermediaries, and the possibility of pre-event injunctions, are in line with the tools and approaches we consider essential in effectively tackling live content piracy.

However, the non-binding nature of the Recommendation has significantly limited its practical implementation. While it offers a useful framework, its lack of enforceability has led to inconsistent adoption across Member States and by Hosting Services, Dedicated Server providers (DSPs) and Content Delivery Network service providers.

Our experience demonstrates that those intermediaries who are willing to cooperate—and who implement prompt and robust measures such as real-time or in less than 10 minutes takedowns, global IP blocking, and direct engagement with rightsholders—can significantly mitigate the availability of illegal live content. This clearly indicates that the problem persists not due to a lack of technical solutions, but due to the absence of a legal obligation that would compel all relevant stakeholders to act.

In this sense, while the Recommendation addresses the right objectives, its effectiveness is undermined by its voluntary nature. Without legal obligation, many intermediaries choose not to take meaningful action, which continues to allow large-scale piracy of live content to flourish across the EU.

Given the ongoing technological and market developments, especially the increasing sophistication of piracy networks, we strongly believe that a mandatory, harmonized legal framework at the EU level is necessary to ensure uniform and effective enforcement against illegal live streaming.



7) Did the Recommendation help to ensure a more consistent approach across Member States? Are further measures necessary at EU level to prevent unauthorised retransmissions of live events and/or the illegal dissemination of other types of copyright-protected content, also taking into account the impact of the Digital Services Act?

It is critical that the European Commission puts forward legislation obliging the intermediaries to remove infringing live content immediately.

As previously explained, the experience of LALIGA is that those intermediaries who want to cooperate remove the infringing live content in less than 10 minutes.

For live content sectors in Europe, EU legislation providing for this obligation would make a real difference.
