

EIAI Submission on Event Music Licensing Clarity, Administration and Accessibility

Introduction

The Event Industry Association of Ireland (EIAI) is making this submission in relation to the operation, accessibility and administration of music licensing requirements for festivals, concerts, public events, community events, exhibitions and other temporary event activity. EIAI fully recognises the legitimate rights of songwriters, composers, performers, publishers and record producers to receive appropriate remuneration for the use of copyright music. Our concern is not with the principle of music licensing. Rather, it is with the practical ability of event organisers to understand, administer and demonstrate compliance with the licensing system. EIAI's objective is to support a licensing system that is clear, predictable and accessible for all organisers, from voluntary community groups to major commercial events.

An organiser should be able to clearly establish, sufficiently early in the planning process:

- whether music licensing is required;
- which tariff or tariffs are likely to apply;
- why a particular tariff applies;
- which party is responsible for obtaining the licence;
- what information must be supplied before and after the event;
- what the likely licensing cost will be;
- how works which may fall outside the relevant controlled repertoire will be treated;
- and what financial consequences may arise where an organiser has not engaged before the event.

Having reviewed the current tariffs and the practical requirements placed on event organisers, EIAI believes that greater clarity, accessibility and standardisation would benefit event organisers, IMRO, PPI and ultimately rights holders by making timely and accurate compliance considerably easier.

Complexity of the current tariff structure

The current tariff framework applies a range of different charging methodologies depending on the nature of an event and the use of music. The 2026 Standard Tariff GP alone includes calculations based on matters such as:

- event capacity;
- persons admitted;
- sessions;
- days;
- floor area;
- accommodation units;
- car parking spaces;
- event or venue type;
- whether music is featured or background music;
- and the particular nature of an activity.

Separate tariffs can introduce further variables, including ticketing and revenue information and, in the case of exhibitions, the number of stands. EIAI does not suggest that different uses of music should necessarily attract identical charges. However, an organiser should be able to identify with reasonable certainty the category that applies, understand why it applies and anticipate the likely licensing liability.

Standard Tariff GP itself states that:

“The appropriate Tariff or rate of Royalty applicable to a music user will be determined by IMRO on the basis of all relevant circumstances.”

Where the applicable classification can have a material impact on cost, greater transparency around the criteria used in making that determination would provide considerable value to organisers.

Mixed and multi-use events

Modern public events frequently do not fit neatly within a single tariff category. For example, a three-day community festival could contain:

- a live music stage;
- a DJ;
- recorded background music in food and seating areas;
- children's entertainment;
- sporting activities;
- traders and exhibitors;
- a parade or procession;
- spoken-word or comedy programming;
- and music within general public circulation areas.

An exhibition might similarly contain centrally supplied background music, individual stands playing their own music, audiovisual displays, a demonstration stage, and live entertainment. It may not be apparent to an organiser whether such an event:

- is assessed principally under one tariff;
- attracts several simultaneous tariffs;
- requires different activities or areas to be assessed separately;
- requires the proportion of musical and non-musical content to be considered;
- or requires individual classification by IMRO/PPI.

This creates difficulties not only for compliance but also for event budgeting, funding applications, procurement and financial planning. The practical difficulty of applying music licensing structures to complex and mixed-programme events is not new. Questions around the treatment of non-musical programme content, the proportion of an event attributable to music and the appropriate royalty calculation have historically arisen between event organisers and music licensing bodies. The fact that these questions continue to arise reinforces the value of establishing clearer and more standardised processes now. EIAI recommends that clear classification criteria and worked examples are developed specifically for mixed and multi-use events.

PPI Tariff 28 — Exhibitions

EIAI would particularly welcome clarification regarding the operation of PPI Tariff 28 for exhibitions. The 2026 tariff provides for a charge of €61.83 per day per stand. However, the published tariff does not appear to define what constitutes a chargeable stand for this purpose.

For example, it is not clear whether the rate applies:

- to every stand at an exhibition where centrally supplied background music is audible;
- only to stands individually playing recorded music;
- only to stands situated within a particular music-enabled area;
- or according to another interpretation.

For a large exhibition, the financial difference between these interpretations could be substantial. A 200-stand exhibition, for example, could produce a very different licensing calculation depending on whether all 200 stands, a much smaller number of stands using music, or a particular music-enabled area were considered relevant. Clear definitions and practical worked examples would remove considerable uncertainty for organisers.

Advance engagement and Higher Royalty Rates

EIAI notes that Standard Tariff GP distinguishes between Higher and Standard Royalty Rates. The tariff provides that performances in the first Licence Year will be charged at the Higher Royalty Rate unless the user applies in writing for a licence before the music is performed. It also provides that undeclared performances are unauthorised and are charged at the Higher Royalty Rate.

EIAI supports encouraging organisers to identify and address licensing requirements during the planning stage. However, where the timing of engagement can materially affect the amount payable, it is particularly important that:

- the requirement is easily understood;
- the correct tariff can be identified;
- the application process is straightforward;
- the information required is clearly specified;
- and organisers can obtain a reliable indication of likely cost before committing event budgets.

The objective should be to make early and accurate compliance the easiest option. The practical importance of this was illustrated during the preparation of this submission. When EIAI attempted to follow the “Get your licence” pathway provided on the IMRO website, access to the licensing page was denied by the website's security firewall and the application process could not be accessed. While this may represent a technical or individual access issue rather than a general service outage, it demonstrates the importance of ensuring that the route through which organisers are expected to secure advance licensing is reliable, accessible and supported by a clear alternative contact or application pathway where technical difficulties arise. This illustrates that even technically minor issues can materially affect an organiser's ability to engage early and avoid Higher Royalty Rates.

Administrative requirements for compliant organisers

EIAI also believes that consideration should be given to the administrative process required of organisers who are actively seeking to comply. Depending on the event and applicable tariff, organisers may be required to provide detailed information relating to matters such as:

- event capacity;

- attendance;
- ticket prices;
- quantities of tickets sold;
- gross box-office receipts;
- complimentary tickets;
- commissions and other ticketing information;
- programme and performance information;
- artists and performers;
- and setlists of musical works performed.

This information can be important both in determining the correct royalty and in helping ensure that royalties collected can be distributed to the appropriate rights holders. EIAI's concern is therefore not that organisers should be relieved of legitimate reporting requirements. Rather, where detailed information is required to establish the correct tariff and royalty, the method for supplying that information should be equally clear, consistent and standardised.

At present, an organiser may have to gather information from:

- ticketing providers;
- box-office systems;
- promoters;
- artists;
- artist managers;
- stage managers;
- production teams;
- venues;
- finance teams;
- and other parties involved in delivery.

For a multi-stage festival or event containing a large number of performers, assembling this information after the event can represent a substantial administrative exercise. The absence of one clear and consistently used event-return format makes that process more difficult than it needs to be.

Standardised Event Music Return

EIAI recommends the introduction of a standardised Event Music Return for licensed events. This could provide one recognised structure through which organisers supply the information required by IMRO/PPI following an event.

The return should ideally be available:

- through an online account or event record;
- and, where practicable, through structured import from ticketing or event-management systems.

A common return could include distinct sections covering the following.

Event information

- Event name
- IMRO/PPI reference
- Venue/location

- Event dates
- Event type
- Permitted capacity
- Actual attendance
- Confirmed tariff or classification

Box-office information

- Ticket category
- Ticket price
- VAT where relevant
- Number sold
- Gross revenue
- Ticketing or booking commission where relevant
- Complimentary allocation
- Other relevant ticket or event revenue

Where a recognised ticketing platform can already produce this information, organisers should ideally be able to upload or import that data rather than manually reproduce it.

Programme and setlist information (for each relevant performance):

- Stage or performance area
- Performer
- Performance date and time
- Song or work title
- Composer/songwriter where known
- Arrangement where relevant
- Duration where required
- Whether the material is original, a cover, traditional or otherwise
- Any additional information necessary to identify the relevant work or repertoire

A standard setlist template should be designed so that an organiser can send it (ideally an online form link) directly to performers, artist managers or stage managers before the event. That would allow the information to be collected in a consistent format from the outset rather than requiring organisers to reconcile multiple handwritten lists, photographs, emails, spreadsheets and documents after an event.

Repertoire identification and works outside the relevant controlled repertoire

The need for accurate setlist information also raises a wider practical issue. Not every musical work performed at an event will necessarily attract the same licensing treatment.

An event programme may include, for example:

- works within the repertoire controlled by IMRO;
- works which have entered the public domain;
- traditional material which is in the public domain;
- arrangements which may themselves attract rights;
- original works;
- and works where further information is required before their status can be established.

It should not be necessary for an event organiser to become a specialist in copyright law in order to determine these matters reliably. Where repertoire status affects the royalty calculation or distribution, EIAI recommends that a digital return provides a mechanism through which the works performed can be identified or confirmed by IMRO. For example, the organiser could supply the relevant setlist and the system could identify, where possible:

Controlled repertoire - Public domain -Further information required

This would give organisers greater certainty while also improving the quality of the data available to IMRO for royalty distribution.

Proposed online Event Music Licensing Calculator

EIAI recommends the development of an online Event Music Licensing Calculator or Assessment Tool. The existing tariff structure is, in practical terms, already dependent on a series of event-specific variables. A digital tool could make those variables visible and understandable to organisers.

The objective would not necessarily be to automate every licensing decision. Events which are genuinely complex could continue to be referred to IMRO/PPI for individual assessment. For more straightforward events, however, the tool could guide the organiser through a structured series of factual questions. These might include:

About the event

- What type of event are you organising?
- Is it indoors, outdoors or both?
- What is the permitted capacity?
- What is the expected attendance?
- Is admission free or ticketed?
- How many days will the event operate?
- How many sessions or performances are involved?

About the music

- Will recorded music be played?
- Will there be live music?
- Will there be a DJ?
- Is music the principal entertainment?
- Is music ancillary or background to another activity?
- In which areas of the event will music be played?
- Will music operate continuously or at specified times?
- Will traders or exhibitors independently play music?

Activity-specific information

Where relevant, the calculator could request information such as:

- number of exhibition stands;
- number of stands using music;
- floor area;
- seating or dancing capacity;

- number of persons admitted;
- number of sessions;
- performance areas or stages;
- ticketing information;
- or other tariff-specific variables.

The tool could then provide:

1. the tariff or tariffs likely to apply;
2. an explanation of why that classification has been suggested;
3. the variables used in the calculation;
4. an indicative Standard Royalty Rate;
5. any applicable minimum royalty;
6. any circumstances which could result in the Higher Royalty Rate applying;
7. any relevant PPI component;
8. the information that will be required from the organiser following the event;
9. and, where necessary, confirmation that individual assessment by IMRO/PPI is required.

The assessment should ideally be saved or downloadable so that the organiser has a clear record of the information provided and the indicative outcome.

A single digital compliance journey

There may be an opportunity to go further than a standalone calculator and create one event-based compliance journey. An organiser could:

1. Create the event - Enter the core event details once.
2. Complete an initial music assessment - Answer structured questions about how music will be used.
3. Receive an indicative classification and cost - The system identifies the likely tariff or refers the event for individual assessment.
4. Receive tariff confirmation - Where individual assessment is required, the confirmed classification is recorded against the event.
5. Prepare for post-event reporting - The organiser can download or issue the relevant box-office and setlist templates before the event.
6. Submit the Event Music Return - Actual ticketing, attendance, financial and programme/setlist information is submitted against the same event record.
7. Receive the final royalty calculation - The final calculation clearly identifies the tariff, variables, applicable minimums and adjustments used.
8. Retain a compliance record - The organiser can retain or download a record confirming the information supplied, the classification applied, the royalty calculation and payment.

This would create a clearer audit trail for both the organiser and IMRO/PPI.

Plain-English event guidance and worked examples

Alongside a calculator or digital assessment process, EIAI recommends the development of concise event-specific guidance supported by realistic worked examples. Examples should reflect the types of events organisers actually deliver, including:

- community festival with background music;

- family fun day;
- free civic event;
- outdoor concert;
- sporting event with PA music;
- exhibition with centrally supplied background music;
- exhibition where individual stands use recorded music;
- Christmas event;
- parade or procession;
- community-hall event;
- charity fundraiser;
- theatre or variety event;
- single-stage ticketed concert;
- multi-stage festival;
- festival combining musical and substantial non-musical programming;
- and a multi-day mixed-use public event.

Each worked example should clearly demonstrate:

which tariff applies - why it applies - what information is required - how the provisional charge is calculated - what information must be returned after the event - how the final charge is established.

This would make the tariff framework much more accessible to occasional organisers while also providing useful certainty to experienced professional organisers.

Responsibility for obtaining the licence

Greater clarity would also be helpful regarding responsibility where several parties are involved in event delivery. Events commonly involve combinations of:

- venue owners;
- local authorities;
- event organisers;
- promoters;
- production companies;
- traders and exhibitors;
- contractors;
- performers;
- and other third parties.

Guidance should clearly explain who would normally be expected to obtain the relevant licence and how an organiser can establish whether a particular music use is already covered by a venue, promoter or other party. It should also address situations in which different parties within the same event independently use music. This would help prevent both inadvertent non-compliance and unnecessary duplication.

Transparency of tariff classification and final calculation

Where IMRO determines the applicable tariff on the basis of the circumstances of an event, EIAI recommends that the resulting classification is confirmed to the organiser in writing and retained within the event's licensing record.

The organiser should be able to understand:

- which tariff has been applied;
- why it has been selected;
- which information or event characteristics informed the decision;
- whether more than one tariff applies;
- and what information will ultimately determine the final royalty.

Following submission of the final event information, the organiser should also be able to see clearly:

- the tariff applied;
- the calculation variables;
- the royalty rate;
- any minimum royalty;
- any relevant adjustment;
- the treatment of repertoire information where relevant;
- and the final amount due.

This would give compliant organisers confidence that the correct information has been supplied and that the applicable rate has been calculated correctly.

Local authority guidance and national signposting

EIAI recognises that local authorities commonly reference IMRO within event guidance and event application processes. This provides an important route through which organisers become aware of their copyright licensing obligations. There is nevertheless an opportunity for IMRO, PPI, local authorities and the events industry to develop a consistent national signposting message which could be incorporated into local-authority event guidance.

This could explain:

- when music licensing should be considered;
- the importance of engaging before the event;
- the distinction between music copyright licensing and statutory event licences;
- the potential financial consequence of retrospective engagement;
- and provide a direct link to the proposed assessment/calculator and standard Event Music Return.

Local authorities should not be required to interpret copyright tariffs themselves. A clear national resource would allow them simply to direct organisers to the appropriate assessment and compliance process.

Benefits of a more standardised system

EIAI believes that greater standardisation would provide practical benefits not only for event organisers but also for IMRO, PPI and the rights holders they represent. Clearer tariff guidance, structured event information, standardised box-office and setlist returns and an online assessment process could:

- reduce routine administrative queries;
- reduce retrospective classification and calculation disputes;
- encourage earlier engagement by organisers;
- improve the completeness and consistency of information received;
- improve repertoire identification;
- assist more accurate royalty distribution;
- reduce the need for manual tariff assessment in straightforward cases;
- provide clearer audit trails;
- and allow IMRO/PPI resources to be concentrated on events which genuinely require individual consideration.

There is therefore a mutual benefit in making the compliance process as clear and efficient as possible. A system which makes compliance easier should result in earlier engagement and better information from organisers, while providing IMRO/PPI with more consistent data on which to base licensing calculations and royalty distributions.

Future consultation with the events industry

EIAI would welcome the opportunity to participate in future consultation concerning tariffs, licensing guidance, administrative processes or systems materially affecting festivals and event organisers. The events industry contains a very broad range of music users, from voluntary community committees and occasional organisers through to professional producers, venues, festivals and major commercial events. Any future review should therefore consider not only the applicable royalty rates but also the practical processes through which event organisers are expected to identify, administer and demonstrate compliance with those requirements. EIAI would welcome constructive engagement with IMRO and PPI on these matters.

Recommendations

Based on the issues outlined above, EIAI respectfully recommends the following practical and achievable improvements:

1. Developing an online Event Music Licensing Calculator/Assessment Tool.
2. Creating a single digital event record through which assessment, classification, licensing, post-event returns and final calculations can be managed.
3. Publishing a standardised Event Music Return for event organisers.
4. Providing a standardised Box Office Return in a clear and readily accessible format across relevant event tariffs.
5. Providing a standardised setlist/programme return, suitable for organisers to issue directly to performers, artist managers and stage managers before an event.
6. Enabling structured import of ticketing and box-office information where practicable.
7. Providing a mechanism through which works reported on event setlists can be identified or confirmed as falling within the relevant controlled repertoire, being in the public domain, or requiring further information.
8. Publishing clear, plain-English event-specific tariff guidance.

9. Providing worked examples for common event types and mixed-programme events.
10. Clarifying how events containing several different music uses or substantial non-musical programming are classified.
11. Clarifying the operation of PPI Tariff 28 and specifically the meaning and application of “per day per stand”.
12. Clearly identifying applicable minimum royalties and the financial consequences of retrospective or late engagement.
13. Providing clearer guidance regarding responsibility between organisers, venues, promoters, production companies, exhibitors and other parties.
14. Providing written confirmation of tariff classification where an event is individually assessed.
15. Providing a clear and transparent final calculation showing the tariff, variables, rates, minimums and relevant adjustments applied.
16. Developing standard national licensing signposting which can be incorporated into local-authority event guidance.
17. Including EIAI and representatives of the wider events industry in future consultation concerning event-related tariffs, licensing processes and administrative requirements.

Conclusion

EIAI recognises the significant work already undertaken by IMRO and PPI to support music users and rights holders, and believes that the proposals suggested would build on that foundation. Event organisers want to comply with music copyright requirements. Effective compliance, however, depends on organisers being able to identify their obligations early, understand the likely cost, collect the correct information and submit that information in a clear and consistent way.

Where an organiser is required to provide detailed ticketing, financial and musical-programme information to ensure that the appropriate royalty can be calculated and distributed, EIAI believes that the corresponding administrative system should make that process as straightforward and standardised as possible.

A combination of clear guidance, an online assessment or calculator, standardised box-office and setlist returns, repertoire identification, transparent tariff classification and transparent final calculations would substantially improve the current process. It would reduce uncertainty for organisers, improve the quality and consistency of information supplied to IMRO/PPI, encourage earlier engagement, reduce administrative queries and disputes, and support more accurate identification and distribution of royalties to the appropriate rights holders.

EIAI believes that these are practical and achievable improvements which would strengthen compliance while benefiting organisers, licensing bodies and rights holders alike. We would also be very happy to engage with IMRO and PPI on these proposals and to assist with practical industry testing of any event-specific guidance, calculator, digital assessment tool or standardised return process.

EIAI believes that a modernised, standardised system would strengthen compliance, reduce disputes, and support more accurate royalty distribution, a shared objective for organisers, IMRO, PPI and rights holders alike.