

EUROPEAN COMMISSION  
Valdis DOMBROVSKIS, Vice-President and  
Commissioner for Trade  
Margaritis SCHINAS, Vice-president  
Mariya GABRIEL, Commissioner for  
Innovation, Research, Culture, Education  
and Youth  
Ylva JOHANSSON, Commissioner for Home  
Affairs  
Berlaymont  
B-1049 Brussels

Brussels, 27 February 2023

Dear Vice-Presidents, dear Commissioners

On behalf of 192 cultural associations and organisations, we write to call for your specific attention and your support in relation to a **US proposal for change on immigration rules** which will impact heavily the European cultural sector and jeopardise the EU-US cultural relations.

Last January, the U.S. Department of Homeland Security (DHS) has issued a [proposed rule](#) that would impose very steep increases to some of its filing fees, including for O and P artist visas applications<sup>1</sup>.

This new rule proposes:

- Filing fees for regularly processed O visa petitions would increase by 260% from \$460 to \$1,655 per petition (this would include a \$600 surcharge to fund the Asylum Program Fee).
- Filing fees for regularly-processed P visa petitions would increase by 251% from \$460 to \$1,615 per petition (this would include a \$600 surcharge to fund the Asylum Program Fee).
- The total number of individuals on a single petition, including O and P arts petitions, would be capped at 25 beneficiaries. This would require numerous petitions for [larger ensembles](#). For example, a visiting ballet company comprising 110 dancers (or an orchestra comprising 110 musicians), plus a handful of accompanying [support staff](#) would require 6 visa petitions rather than 2.
- The [Premium Processing Service](#) (unaffordable to most organizations at a current cost of \$2,500) would take longer with USCIS redefining the timeframe from 15 calendar days to 15 business days (federal working days) in order to complete processing. As this fee was very recently increased, it is disappointing that proposed processing times would lengthen—decreasing efficiency—and fail to provide improvements after this additional funding has been realized.

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<sup>1</sup> O-1B, O-2, P-1B, P-2, P-3, P Support Personnel

The cultural relations between the USA and EU are intense and significant. Mobility of artists and cultural professionals is a core element of EU cultural policy and signifies the concrete implementation of art 167 TFEU on the promotion of the diversity of cultures. Culture is also a key component of EU external relations. In trade terms, the export of 'personal, cultural and recreational services' to US amounted to 19,4 billion Euros and import from US was as high as 22,8 billion Euros in 2021<sup>2</sup>. The advantage for the US compared to EU is demonstrated by the fact that currently, cultural<sup>3</sup> services belong to the group of top 3 imports from the US into the EU.

Artists and cultural professionals from the USA enjoy visa-exempt status when travelling to the Schengen area and have exemptions for labour permits in a large majority of EU members states in case of short stays. In addition, in accordance with the US double tax treaty, US performing artists enjoy a competitive advantage to European performing artists thanks to a tax exemption when earning below a threshold. All those advantages allow for easier travel and a proportionally higher traffic from US-based artists to the EU with no extra costs.

By contrast, for several decades the US have applied complicated visa rules and expensive visa procedures, which result in a continuous competitive disadvantage for artists from Europe. It is with certainty that this imbalance will increase if the newly proposed visa rules will be introduced.

European organisations have addressed this situation many times to the Commission, including on the occasion of the EU-US Summit on 15 June 2021 in an [open letter](#) addressed to Commission President von der Leyen, Council President Michel and President Biden.

We call upon your help to express concerns on behalf of the EU to the US regarding the proposed increase of visa costs and its impact on artists.

Yours sincerely

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On behalf of the undersigned,

### **European and international organisations (26)**

Association des Centres Culturels de rencontre (ACCR)  
Association Européenne des Conservatoires, Académies de Musique et Musikhochschulen (AEC)  
Central European Organisation Artist Management  
Circostrada  
ELIA, globally connected European network for higher arts education  
Europe Jazz Network (EJN)  
European Association of Artist Managers (AEAA)

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<sup>2</sup> Source [Eurostat](#) Highest levels of international trade for services, selected countries, 2021

<sup>3</sup> Infographic of 22 November 2022 <https://www.consilium.europa.eu/en/infographics/eu-us-trade/>

European Composer and Songwriter Alliance (ECSA)  
 European Music Council (EMC)  
 European Music Managers Alliance (EMMA)  
 European Network of Cultural Centres (ENCC)  
 European Orchestra Federation (EOFed)  
 European Union of Music Competitions for Youth (EMCY)  
 FACE  
 female:pressure  
 IMPALA  
 International Artist Organisation (IAO)  
 International Federation of Musicians (FIM)  
 International Music Council (IMC)  
 Liveurope  
 On the Move  
 Opera Europa  
 Pearle\* - Live Performance Europe  
 Professional Lighting and Sound Association (PLASA Europe)  
 SOS - Save Our Spectrum  
 Trans Europe Halles

### **National organisations (166)**

|   |                |
|---|----------------|
| 3S Music Management   | Netherlands    |
| 5000 Ltd  | United Kingdom |
| 88 Music Management   | Netherlands    |
| Aakash Odedra Company   | United Kingdom |
| alba KULTUR   | Germany        |
| ALT@RT z.ú.   | Czech Republic |
| Ariën, Arts & Music Mgt   | Belgium        |
| Art & Design Institut, Prague   | Czech Republic |
| Arts and Theatre Institute  | Czech Republic |
| Asociace profesionálních divadel České republiky                          | Czech Republic |
| Asociación de Festivales de Música (FMA)                                  | Spain          |
| Athlone Artists   | United States  |
| Azimuth Productions   | France         |
| BAM! Popauteurs (Dutch artists, songwriters, and producers' organization) | Netherlands    |
| Black Flower VZW  | Belgium        |
| Bmkltsch Rcrds  | Netherlands    |
| Bookhooker Agency   | Netherlands    |
| Boris Orlob Management  | Germany        |
| Botanique   | Belgium        |
| Bozar, Centre for Fine Arts Brussels                                      | Belgium        |
| Brullie Blom Producties   | Netherlands    |
| Bulgarian Music Association   | Bulgaria       |
| Busker Artist Agency  | Belgium        |

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| CADÛ   | Austria        |
| Caroline Phillips Management   | United Kingdom |
| Copenhagen Opera Festival  | Denmark        |
| Danish Artist Managers (DAM)   | Denmark        |
| Dansk Teater   | Denmark        |
| Day Four Management  | Netherlands    |
| Delage Artists   | Austria        |
| DF Artists   | Italy          |
| Dry Levee Entertainment  | Netherlands    |
| Dutch Music Export   | Netherlands    |
| DutchCulture   | Netherlands    |
| eigenARTEvents.com - Timo Holstein   | Germany        |
| Endewerf Managment   | Netherlands    |
| ESNS   | Netherlands    |
| Esther Schollum Artists Management   | Austria        |
| Étude Arts, LLC  | United States  |
| Federación Estatal de Asociaciones de Empresas de Teatro y Danza (FAETEDA) | Spain          |
| FES Orchestra  | Belgium        |
| Fett Music   | Germany        |
| Fletcher Artist Management   | United States  |
| Front 242  | Belgium        |
| Full Spectrum  | Netherlands    |
| Fuzzbox BV   | Belgium        |
| Gentlemanagement   | Belgium        |
| Gnome  | Belgium        |
| Groove Music Productions   | Netherlands    |
| Hamburg Music Business e.V.  | Germany        |
| Harrison Parrott - Polyarts  | United Kingdom |
| Harrison Parrott DE  | Germany        |
| Harrison Parrott ES  | Spain          |
| Harrison Parrott FR  | France         |
| Harrison Parrott NL  | Netherlands    |
| Harrison Parrott UK  | United Kingdom |
| Headfirst Music  | Netherlands    |
| Heads Up mgmt  | Netherlands    |
| High Hat VZW   | Belgium        |
| Hive Mind  | Netherlands    |
| Hopkinz.management & marketing   | Germany        |
| IMG Artists  | United Kingdom |
| Inside Jazz  | Belgium        |
| Insignia Artists Management  | United States  |
| Interclassica Music Management GmbH  | Austria        |
| Interessenverband Musikmanager & Consultants (IMUC)                        | Germany        |
| International Theatre Institute - Czech centre                             | Czech Republic |

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|---|-----------------|
| International Theatre Institute - German centre     | Germany         |
| International Theatre Institute - Macedonian centre | North Macedonia |
| JM International                                    | Belgium         |
| Judy Blank Music                                    | Netherlands     |
| Karsten Witt Musik Management                       | Germany         |
| Kirchner Musikmanagement                            | Germany         |
| Kleo Tuemmler Artist Management                     | Germany         |
| Konzertbüro Andreas Braun                           | Germany         |
| Konzertdirektion Hampf                              | Germany         |
| Konzertdirektion Martin Müller                      | Germany         |
| Kraak & Smaak                                       | Netherlands     |
| Kuenstlermanagement Till Doench                     | Austria         |
| Künstlermanagement Uwe Kanthak                      | Germany         |
| LAB Music   | Netherlands     |
| Lærke Uldal, EMC Fellow                             | Denmark         |
| Les Talens Lyriques                                 | France          |
| Lobby Call  | Belgium         |
| Luzerner Theater                                    | Switzerland     |
| Machreich Artists Management GmbH                   | Austria         |
| Magnum Opus Artists LLC                             | United States   |
| MAI Foundation - Piper Artists Management           | United States   |
| Mark Kendall Artists Management FR                  | France          |
| Mark Kendall Artists Management UK                  | United Kingdom  |
| Mark Stephan Buhl Artists Management                | Austria         |
| Martin Theander - Event organiser                   | Sweden          |
| MB Music Production                                 | Netherlands     |
| Melos Opera srl                                     | Italy           |
| Mercks Muziek                                       | Netherlands     |
| Mimi Harmer, EMC Fellow                             | United Kingdom  |
| MobiCulture   | France          |
| Modemux - Artist & Event Services                   | Belgium         |
| Momentum Agency                                     | Netherlands     |
| Mothers Cake AG                                     | Austria         |
| MPS Hanseatic GmbH                                  | Germany / NL    |
| Music and Lemon Pie                                 | Belgium         |
| Music Managers Forum Finland                        | Finland         |
| Music Managers Forum Netherlands                    | Netherlands     |
| Music Managers Forum Sweden                         | Sweden          |
| National Fund for Cultural Participation            | Netherlands     |
| Nationaltheater Mannheim                            | Germany         |
| NVPI  | Netherlands     |
| Opera Ballet Vlaanderen                             | Belgium         |
| Opéra de Rouen Normandie                            | France          |
| Opéra de Toulon                                     | France          |

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|---|----------------|
| OPERA2DAY                                       | Netherlands    |
| Orchester.ch                                    | Switzerland    |
| Ornella Cogliolo                                | Italy          |
| Outliner Management                             | Netherlands    |
| Paul van de Waterlaat.                          | Netherlands    |
| Performing Arts Fund NL                         | Netherlands    |
| Pip Blom  | Netherlands    |
| Polo Cultural Gaivotas Boavista                 | Portugal       |
| Popronde  | Netherlands    |
| PRODISS   | France         |
| Producciones Submarinas                         | Spain          |
| Production Services Association                 | United Kingdom |
| PROFEDIM  | France         |
| Pukkelpop                                       | Belgium        |
| RAManagement                                    | Netherlands    |
| REBIS Music Group                               | Netherlands    |
| Rodeostar GmbH                                  | Germany        |
| Rotterdam Philharmonic Orchestra                | Netherlands    |
| Royal Concertgebouw Orchestra                   | Netherlands    |
| Royal Opera of Madrid                           | Spain          |
| RSB Artists                                     | France         |
| Rumoer!   | Belgium        |
| Sayed Jamaluddin Hashemi, EMC Fellow            | Portugal       |
| Scharmien Art                                   | Austria        |
| Schoenbrunn Palace Orchestra Vienna             | Austria        |
| Segel Theatre Center                            | United States  |
| Society of Polish Philharmonics                 | Poland         |
| Soepermarkt Music Management                    | Netherlands    |
| Stichting Creator Preserver Destroyer           | Netherlands    |
| Stichting The Homesick                          | Netherlands    |
| STOMP   | Netherlands    |
| Supersonic                                      | France         |
| Swedish Performing Arts Coalition (Scensverige) | Sweden         |
| Swedish Union for Performing Arts and Film      | Sweden         |
| Swiss Music Council                             | Switzerland    |
| Tamizdat  | United States  |
| Tatjana Seyfarth                                | Germany        |
| Teatro de la Maestranza de Sevilla              | Spain          |
| The Lasses                                      | Netherlands    |
| TINFO - Theatre Info Finland                    | Finland        |
| TOBS  | Switzerland    |
| Tommy Advice BV                                 | Netherlands    |
| Traverso Management BV                          | Netherlands    |
| Treetop Agency                                  | Netherlands    |

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|---|-------------|
| Triggerfinger   | Belgium     |
| Tubbax Management                                     | Belgium     |
| Twist Agency  | Netherlands |
| Valiart Management                                    | Germany     |
| Vereniging Nederlandse Poppodia en Festivals (VNPF)   | Netherlands |
| VI.BE   | Belgium     |
| VZW Bonk - Flat Earth Society Orchestra               | Belgium     |
| Walboomers Music                                      | Netherlands |
| Weinstadt Artists Management                          | Belgium     |
| Wolx Artist Management                                | Belgium     |
| Zentralrat Mitte GmbH / Marcsfirma / Bluelion records | Germany     |