Coimisiún na Meán

Response to Consultation:
Draft European Works Rules for On-Demand Audiovisual Media Service Providers

Consultation opened: 29 April 2026
Consultation closed: 17 June 2026 (extended from 10 June 2026)
Publication of response to consultation: 17th Nov 2026

This document outlines the key points made in submissions to this consultation, Coimisiún na Meán's response to them and the changes made to Draft European Works Rules for On-Demand Audiovisual Media Service Providers.

Public

1. Introduction

Coimisiún na Meán ("An Coimisiún") is Ireland's independent agency for developing and regulating a thriving, diverse, creative, safe, and trusted media landscape. An Coimisiún's aim for Irish culture and media is to have "a media landscape that is sustainable, pluralistic and participative, and that reflects and shapes who we are as a society" (Strategy Statement 2025-2027). The promotion of European Works by audiovisual media service providers is one mechanism to achieve that aim.

European and Irish law requires providers of audiovisual on-demand ("VOD") media services to have at least 30% European works in each catalogue of their VOD service and to take steps to ensure the prominence of those works. These requirements are a way of ensuring the availability of culturally relevant and diverse content for audiences and supporting indigenous European content production. An Coimisiún has a role, set out in legislation, to make rules for VOD providers to meet their European works obligations.

An Coimisiún prepared Draft European Works Rules for On-demand Audiovisual Media Service Providers ("Draft Rules") and had a public consultation on the Draft Rules between 29 April and 17 June 2026. Having considered the submissions received, this report provides the outcomes of the consultation.

This document explains the legislative basis for the Draft Rules (section 2), describes the approach to the consultation (section 3), outlines the key points raised in submissions to the consultation and An Coimisiún's response to these (section 4) and, finally, sets out the changes made to the Draft Rules and the next steps (section 5).

2. Legislative basis

Part 10A of the Broadcasting Act 2009 ("the Act") transposes Ireland's obligations on the promotion of European works for audiovisual on-demand media services provided at Article 13(1) of the Audiovisual Media Services Directive (Directive 2010/13/EU, as amended by Directive (EU) 2018/1808) ("AVMSD").

Under the Act, a provider of a VOD service under the jurisdiction of the State is required to:

- Ensure that the share of European works in each catalogue of its service is not less than 30% (section 159B(1)); and
- Take steps specified in rules under section 159C(3) to ensure the prominence of European works in each catalogue of its service (section 159C(1)).

Section 159(B) of the Act outlines how An Coimisiún can make rules for determining:

- whether an audiovisual on-demand media service has a catalogue in which the share of European works is less than 30 per cent,
- for the purposes applying exemptions, whether a media service provider has a low turnover or low audience, and,
- the records a provider must keep and any other action a provider must take to enable compliance.

3. Approach to the consultation

On 29 April 2026, An Coimisiún published its public consultation on draft European Works Rules for On-Demand Audiovisual Media Services and invited submissions until 10 June 2026, which was later extended to 17 June 2026.

An Coimisiún published the Draft Rules, alongside supplementary guidance, on its website. The Draft Rules set out:

- A title-based methodology for determining compliance with the 30% share obligation;
- A measurable, verifiable framework for prominence measures;
- Proposed criteria and thresholds for low turnover, low audience, and narrow subject matter exemptions; and
- Reporting, monitoring, and verification arrangements to support effective assessment of compliance with European works obligations.

An Coimisiún notified relevant regulated entities of the consultation. An Coimisiún also held an online briefing session with industry on 3 June 2026, outlining the contents of the Draft Rules and providing a Q&A on the consultation.

Consultees were offered the following prompts for responding to the consultation, as follows:

A. Do you have any views on the overall approach taken in the Draft Rules to implementing section 159B and 159C of the Act?
B. Do you have any views on the proposed title-based methodology for calculating the 30% share of European works?
C. Do you have any views on the proposed limited circumstances in which individual episodes may be treated as standalone titles?
D. Do you have any views on the proposed prominence measures (including dedicated sections, metadata tagging, featured placement, etc.)?
E. Do you have any views on the requirement that at least one prominence measure must consist of systematic metadata tagging of European works?
F. Do you have any views on the proposed thresholds for low turnover (€2 million service-derived turnover) and low audience (below 1% of the relevant national market)?
G. Do you have any views on the proposed approach to exemptions based on the nature or general theme of a service (narrow subject matter), including the evidence required to support an application?
H. Do you have any views on the proposed reporting and monitoring framework?

4. Consultation submissions & responses

An Coimisiún received submissions from nine (9) organisations, comprised of a mix of VOD providers and representative industry bodies:

1. Apple
2. Beyond Mainstream, a global streaming alliance for specialized services
3. Eiretainment
4. Technology Ireland, an association within IBEC
5. MPA, the Motion Picture Association
6. SKY
7. Screen Producers Ireland
8. TG4
9. Warner Bros Discovery

The submissions contained notable positive feedback on An Coimisiún's approach:

On prominence measures:

> *"We welcome the approach taken in Draft Rule 9.3, which requires VOD service providers to implement at least one of the prescribed prominence measures, rather than mandating a single, prescriptive method of compliance. This is the right approach given the differences in*

VOD services across the EU and we ask that CnaM maintains this in the finalised rules…. The flexibility afforded by Draft Rule 9.3 allows each VOD service provider to identify and implement the prominence measure that is best suited to its particular service design, audience, and technical infrastructure. This is both more proportionate and more likely to result in meaningful prominence for European works in practice. It allows VOD service providers to promote European works in ways that are authentic to the service and genuinely resonant with their audiences." **– Apple**

On title-based methodology:

"We welcome the flexibility afforded by draft rule 8.3.2 in respect of TV series that are not commissioned on a season-by-season basis, as this reflects actual industry practice in certain areas of content development and financing. **– IBEC**

On the exemption thresholds:

"Per Section 10.2.2, we welcome the rules' focus on limiting the definition of turnover to that derived from the VOD service itself while excluding "revenues from other business activities". This approach ensures a more accurate representation of the actual economic footprint of the relevant VOD service in the Irish market and appears aligned with Recital 25 AVMSD regarding "providers with no significant presence on the market" **– Motion Picture Association**

On the overall approach:

"TG4 supports the introduction of the Rules in the interests of clarity and also supports the promotion of European works in a landscape where European works come into increasing competition from streamers and from non-European works." **- TG4**

The key points raised in the submissions and An Coimisiún's response to them are presented below using the structured prompts provided in the consultation (see items A-H in section 3 above).

While all issues raised in the various submissions were considered by An Coimisiún before making any decisions on changes to the Draft Rules, this document does not purport to set out or address each issue out exhaustively. Some matters raised by consultees were deemed to be more appropriately addressed in guidance or through direct engagement with industry during compliance reviews, rather than in the Draft Rules themselves. Other points raised will inform the development of supporting processes, and/or are issues which will be kept under review when operationalising any finalised rules.

A. Do you have any views on the overall approach taken in the Draft Rules to implementing section 159B and 159C of the Act?

Summary of responses:

- Several respondents requested that a transitional period is established to allow industry to establish necessary processes. Some indicated that technological changes to platforms (e.g. introducing meta-data tagging) can take time, and they are concerned about appearing non-compliant while their processes evolve to meet the obligations. They are concerned that establishing new requirements alongside the processes to address non-compliance (e.g. investigations), may create a situation where VOD providers are non-compliant with recently drafted rules and subsequently vulnerable to serious compliance action, within a time period too short to reasonably achieve compliance.
- Some respondents requested a longer reporting cycle, citing the adminstrative burden for annual reporting.
- A respondent requested that An Coimisiún work with each VOD provider to agree a tailored compliance pathway for each service.
- A respondent requested a 'best efforts' approach to compliance, one which acknowledges that production timescales span multiple years, and so the production of compliant content will be slow.
- A respondent voiced a concern that specialist content may be categorised as general interest due to that content attracting high audience figures.

- A respondent noted their appreciation at being consulted on the Draft Rules, and requested they are similarly consulted on future guidance.
- A respondent queried the ability of the Draft Rules to respond to developments, such as user-generated content platforms and AI-generated content.
- A respondent called for stronger co-operation with national regulators in relevant jurisdictions to enforce the rules.
- A respondent asked An Coimisiún to consider whether a regulatory impact assessment would be appropriate to assess compliance costs and proportionality.

An Coimisiún response:
The Draft Rules are intended to provide clarity to VOD providers on how they can meet their European Works obligations, which are set out in statute and have been in effect since 15 March 2023. VOD providers have already had a significant amount of time to consider how they can meet their obligations. However, the Draft Rules do, for the first time, mandate certain practices (e.g. meta-data tagging) and establish new procedures (e.g. the exemption tests). An Coimisiún intends to retrospectively review VOD providers' compliance with the obligations only once a significant period (e.g. 12 months) has passed after finalised rules have been published and come into effect. An Comisiún considers that this proposed procedure creates a sufficient window of opportunity for VOD providers to put in place any necessary technical measures. The timing of the compliance review period will be communicated to VOD providers at the earliest possible opportunity.

As provided at para 11.3.1 of the Draft Rules, An Coimisiún shall assess non-compliance "in a proportionate, transparent, and evidence-led manner, having regard to the nature, scale and risk profile of the service concerned." Para 11.3.3 also states that where An Coimisiún might identify potential non-compliance, An Coimisiún "shall ordinarily seek to address the matter through engagement and corrective steps before considering escalation to investigation under Part 8B of the Act." Even in instances of non-compliance where An Coimisiún may be required to consider using its enforcement powers, the Draft Rules (para 12.3) clearly provide that An Coimisiún "shall act in a manner that is lawful, proportionate, and procedurally fair, having regard to the nature and seriousness of any apparent non-compliance and any steps taken by the provider to remedy it." Finally, para 13.2 states that An Coimisiún will keep the requirements "under review to ensure that they remain effective, proportionate, and consistent with the objectives of the Act and the AVMSD." An Comisiún considers that these provisions allow for relevant context to be taken into consideration in the event of non-compliance and deciding on an appropriate regulatory response.

An Coimisiún intends to provide guidance to industry on the Rules, as needed, where specific issues requiring clarification may arise from time to time as the Rules are implemented.

An Coimisiún cooperates with relevant European media regulators through the mechanisms established by the AVMSD and the European Media Freedom Act.

B. Do you have any views on the proposed title-based methodology for calculating the 30% share of European works?

Summary of responses:
- Several respondents requested definitional clarity regarding the meaning of 'catalogue', and indicated a desire to have a catalogue defined as relating to a specific territory.
- Several respondents registered their appreciation for the proposed approach to use a title-based methodology rather than calculation of hours or budget.
- Some respondents requested clarification on the definition of EU works.
- Some respondents suggested the wording referring to 'feature TV films' should be amended to 'feature films' to include theatrical releases and align with wording in the European Commission's guidelines.
- Some respondents raised concerns about possible fluctuations in percentages of European works in a catalogue below the minimum threshold because of seasonal changes, production schedules and licensing arrangements.
- Some respondents remarked that the obligations could create unintended outcomes, such as:
    - VOD providers adding low-quality European Works to their catalogues (or the removal of non-European content) in order to meet the 30% quota.

    - An expectation to have European works within a catalogue of specialised content where it is not suitable (e.g. Japanese manga)
- A respondent requested further definitional clarity about the practical calculation of TV series which are not commissioned by season.
- A respondent remarked that the obligations appear tailored to large general-entertainment services and fail to take account of diverse business approaches, catalogues and audiences. On a similar note, another respondent remarked that the rules should take into consideration a VOD provider's means of acquiring content, including whether it commissions or licenses content.
- A respondent requested the inclusion of qualitative measures regarding European works, to promote ongoing investment in recent works, works in both English and Irish, works in other national or regional languages, diversity of genres and independent productions.
- A respondent queried the methodology for counting sports programmes (specifically) those which are available for viewing for a short time only) as standalone titles.

An Coimisiún response:
European works obligations, as set out in Article 13(1) of the AVMSD and Part 10A of the Broadcasting Act 2009, refer to only to 'catalogues', and not 'national catalogues'. European Commission guidelines[1] on the application of Article 13 refer to both 'catalogues' and 'national catalogues'. An Coimisiún considers that the Draft Rules are sufficiently clear on the applicability of the quota to each national catalogue of a VOD service, however, may, An Coimisiún can provide further information in published guidance or through direct assistance to a VOD provider in discrete circumstances.

The definition of what constitutes a European work is set out in Article 13(1) of the AVMSD as well as Part 10A of the Broadcasting Act. Including the definition would provide an ease of reference for VOD providers when preparing compliance material, and so the definition has been appended to the Draft Rules.

The Draft Rules (para 8.3.1) state that a 'title' will correspond to 'one feature TV film'. An Coimisiún notes that industry distinguishes between a feature film and a TV film in practice, in that a feature film is often intended for theatrical cinema release whereas a TV film is produced for and first distributed on television. European Commission guidelines also refer to 'feature and TV films' and so the Draft Rules will be amended to reflect the distinction.

The European works quotas represent a lower threshold; not a target. Where there may be fluctuations in the amount of European works in a catalogue, whether due to seasonal changes or other reasons, it is expected that the proportion of European works will not fall below the minimum threshold of 30% of a catalogue.

An Coimisiún notes that providers of VOD services with a relatively small audience or low turnover or of a niche nature can seek an exemption to the European works obligations, as applicable.

An Coimisiún notes that there is no legislative basis to impose further obligations on VOD providers, such as linguistic, genre, investment or independent production sub quotas.

C. Do you have any views on the proposed limited circumstances in which individual episodes may be treated as standalone titles?

Summary of responses:
- Some respondents requested that, when determining applicability, the Draft Rules consider length or cost, but not the combination of both.
- One respondent requested clarification regarding the reference to the mean budget of a feature film, citing likely differences at national, European, and global levels.
- A respondent was concerned this provision would only be applied on 'an exceptional basis'.

An Coimisiún response:

[1] EUR-Lex - 52024SC0149 - EN - EUR-Lex

The proposed measure to treat some individual episodes as standalone titles in intended to reflect An Coimisiún's recognition that some television episodes have a duration and production cost comparable to those of films. An Coimisiún recognises that this is becoming somewhat more common, and so para 8.4 will be amended to remove reference to the measure being applied on 'an exceptional basis'.

This accommodation is intended to support VOD providers in these specific contexts. The scope would be widened if it were to apply to episodes with either a specific duration **or** production cost. As a result, the proposed measure would become operationally unsound. Further information about the average cost and length can be provided in supplementary guidance.

D. Do you have any views on the proposed prominence measures (including dedicated sections, metadata tagging, featured placement, etc.)?

Summary of responses:

- Several respondents noted their appreciation for the flexibility within the Draft Rules to introduce one prominence measure which best suits a particular service.
- A respondent requested that the Draft Rules increase the number of mandatory measures, from one measure to three.
- A respondent requested that services with specialised content, with relatively limited technical and metadata architecture, should be exempt from the mandatory measure.
- A respondent requested that An Coimisiún remain flexible to alternative methodologies to allow for changing technology and/or viewing habits.
- A respondent requested that the methodology be reviewed after three years.

An Coimisiún response:

The definition of what constitutes a European work is set out in Article 13(1) of the AVMSD as well as Part 10A of the Broadcasting Act. Including the definition would provide an ease of reference for VOD providers when preparing compliance material, and so the definition has been appended to the Draft Rules.

An Coimisiún considers that making metadata tagging the one mandatory measure in the Draft Rules is foundational for;

a) ensuring audiences can search and discover European works
b) facilitating the presentation of European works as a thematic collection in a catalogue (if a VOD provider so chooses).

Moreover, metadata tagging also supports proactive compliance and regulatory reporting by VOD providers with their obligations. An Coimisiún considers metadata tagging to be a common technological capability and a proportionate regulatory requirement in this context.

An Coimisiún considers mandating only one mandatory measure (alongside another measure of the VOD provider's choice) to be an appropriate means to ensure VOD providers can demonstrate compliance while also providing the flexibility to implement a range of additional measures.

An Coimisiún notes that the Rules may be amended from time to time. Specifically, section 13 of Draft Rules provides that the Rules will be subject to periodic reviews "to ensure they remain effective, proportionate and consistent with the objectives of the Act and the AVMSD." The same section notes that An Coimisiún may amend the Rules where it considers it necessary or appropriate.

E. Do you have any views on the requirement that at least one prominence measure must consist of systematic metadata tagging of European works?

Summary of responses:

- Several consultees requested further clarification regarding the definition of European works.
- Several respondents request that the Draft Rules (and An Coimisiún's subsequent compliance activity) recognise the dependency VOD providers have on third party providers' ability to provide accurate metadata.

- Several respondents raised concerns that metadata tagging is disproportionate and that tagging does not guarantee or ensure prominence.
- Some respondents requested that An Coimisiún not stipulate any mandated measure, citing the cost and technical difficulty in transforming their existing services.
- A respondent suggested that any tagging or categorisation of European works should use the European Broadcasting Union's tagging and categorisation taxonomy.

An Coimisiún response:
An Coimisiún recognises that metadata will frequently be provided to VOD providers where content is acquired from a third party. While it is a VOD provider's ultimately responsibility to ensure compliance with both the obligations and Rules, An Coimisiún intends to take a reasonable and proportionate approach when undertaking the compliance reviews. An Coimisiún may provide further information on this point in supplementary guidance.

The Draft Rules adopt a flexible, outcome-oriented framework for prominence, consistent with the AVMSD and current EU regulatory approaches. While the Directive requires that European works be "prominently displayed", neither EU law nor national legislation prescribes a specific technological or interface-based method.

In line with European Commission guidance and EBMS report findings:
- Prominence can be achieved using a range of measures, including homepage sections, carousels, metadata tagging, curation, and discoverability tools;
- Member State practice varies widely, illustrating that there is no single mandated model for prominence; and
- Measurable, transparent, and proportionate mechanisms are more effective where there is significant diversity of VOD service types than prescriptive interface rules or mandatory algorithmic interventions.

Accordingly, the Draft Rules require providers to implement metadata tagging, and at least one other effective prominence measure. An Coimisiún is satisfied this ensures technological neutrality, avoids disproportionate obligations, and reflects the diversity of service design across the sector.

F. Do you have any views on the proposed thresholds for low turnover (€2 million service-derived turnover) and low audience (below 1% of the relevant national market)?

Summary of responses:
- A respondent welcomed the exemption explicitly making a distinction between revenue from the VOD service and revenue from other business streams.
- A respondent requested clarification about how/whether the exemptions would apply to public sector media.
- A respondent queried which data source An Coimisiún would use determine market share.
- A respondent requested that An Coimisiún consider increasing the €2 million threshold to reflect both market growth and inflation since the €2 million figure was established.
- A respondent advised that the threshold should be amended on a shorter time-period than the proposed 5-years, to reflect high inflationary pressures and rapid annual growth in the size of the market
- A respondent commented that financial and market data available to smaller providers is not robust enough to determine their suitability for this exemption.
- A respondent requested further clarity about the definition of a 'partner or linked entreprise' in relation to this exemption.
- A respondent requested that consideration be given to a smaller threshold for SMEs.
- A respondent remarked that the Draft Rules to not appear to take account of relevant revenue generating models within potentially distinct markets (e.g. free, transactional and advertisement-based).
- A respondent remarked that it is unclear whether this exemption shall be applied based on the revenue generated by each catalogue (e.g. at a national level) or by country of origin.

An Coimisiún response:
The Draft Rules include proposed thresholds and criteria for exemptions under section 159B(3)(b) and section 159I(1) of the Act. These were informed by European Commission Guidelines, which provide a microenterprise turnover threshold of €2 million per year as an appropriate benchmark and an audience share of 1% as a commonly used reference point. An Coimisiún recognises that the industry is dynamic and market shares have been variable since the guidelines were published in 2020. This threshold can be kept under review.

An Coimisiún considers that, where a VOD provider is seeking to obtain an exemption on the basis of low turnover, the onus is on that provider to supply relevant information to support a claim for exemption. An Coimisiún will consider the robustness and verifiability of any such information on a case-by-case basis.

G. Do you have any views on the proposed approach to exemptions based on the nature or general theme of a service (narrow subject matter), including the evidence required to support an application?

Summary of responses:

- Several respondents requested that An Coimisiún should determine, using its own initiative powers, what constitutes a thematic exemption rather than VOD providers having to apply for an exemption.
- A respondent raised concerns about An Coimisiún's determination of a specialised service and would prefer to have the nature of the programming considered rather than its mass market appeal, stating that some niche programmes would have a broad audience.
- A respondent requested that this exemption be broadened to allow for niche sub-sections on a broad appeal platform.
- One respondent requested that catalogues already hosting a high proportion of European works (90% was suggested) should be granted an exemption.
- A respondent suggested that the exemptions should be expanded to cover VOD services wholly within the Irish language.
- A respondent remarked that the language in section 10.5, detailing An Coimisiún's proposed approach towards exemptions for public sector media could benefit from better articulation of the intention and practical outcome of these clauses.

An Coimisiún response:
It is European and Irish public policy to promote European works on television and VOD services to audiences across Europe, which means European works obligations are intended to apply across the board unless there is a reasoned basis for them not to. An Coimisiún considers it reasonable in such circumstances to place the onus on a VOD provider to demonstrate why a VOD service should be exempted from these obligations.

An Coimisiún notes there is no legislative basis for exempting a VOD service from European works obligations where a catalogue of a VOD service already has a high proportion of European works and/or contains only Irish language content.

Para 10.5 of the Draft Rules refers to the application of the Rules to public service media. The intention of this paragraph is to provide An Coimisiún with the discretion to determine, in discrete circumstances, where an exemption would not be an appropriate option for a public media service. This discretionary ability would have regard to the provider's statutory public service remit, obligations imposed on the provider under law for public service content, and the role of public service media in promoting pluralism. An Coimisiún can provide further information to public service media organisations through engagement and guidance on this point.

H. Do you have any views on the proposed reporting and monitoring framework?

Summary of responses:

- Several respondents raised concerns about compliance 'spot checks' being operationally distruptive and suggest such checks are reserved for cases of persistent compliance issues, where less intrusive means have been exhausted.
- Some respondents raised concerns about sharing performance data with An Coimisiún due to its commerically sensitive nature.
- A respondent requested more clarity in the rules about the analytics or performance measures coming within the scope of the reporting and monitoring framework.
- A respondent requested that the reporting period, which is yet to be defined by An Coimisiún, be communicated to industry as early as possible.
- A respondent recommended that VOD providers should also explain how content is ranked and recommended.
- A respondent remarked that applying for annual exemptions would be administratively onerous, and that burden would fall on those VOD providers the exemption is designed to protect.

An Coimisiún response:
The Draft Rules provide for a range of methods for An Coimisiún to assess compliance with European works obligations, including 'spot checks' of providers. As with any regulatory activity, spot checks would be used in a proportionate and fair manner.

An Coimisiún regularly receives commercially sensitive information as part of its regulatory activity. Any commercially sensitive information provided as part of European works compliance monitoring would be subject to the same safeguards as other such information provided to An Coimisiún.

The Draft Rules are intended to provide clarity on how a VOD provider can meet and report on its European works obligations without being over prescriptive on specific measures and timeframes to avoid undue constraints and rigidity in approach. Guidance can be provided to VOD providers as compliance monitoring and reporting is operationalised, as the need arises.

The requirement for applications for exemptions to be submitted annually safeguards the proper application of European works obligations in cases where changes are made to a VOD service such that an exemption is no longer appropriate. In cases where there have not been any material changes to a VOD service, An Coimisiún can consider how the application process for exemptions can be simple and streamlined to avoid undue regulatory burden.

5. Outcomes and next steps

Having considered the submissions to the consultation as outlined in section 4 above, the following three changes have been made to the Draft Rules:

1. **Definition of European Works:** Several consultees requested further clarification regarding the definition of European works. As a result, the definition is now appended to the Draft Rules, for each of reference.
2. **Interpretation of a 'title' for calculating the quota:** The phrase, in para 8.3.1, 'one feature TV film', is now amended to 'one feature or TV film'. This reflects a distinction made, by industry, between films intended for theatrical release, and those produced for and first distributed on television.
3. **Interpreting a TV episode as a standalone title:** Para 8.4 outlines the circumstances where a standalone episode in a series (of a cost and length similar to a film) may be deemed a single title for the purpose of calculating the European works quota. Given big-budget, film-length episodes are becoming increasingly common, a reference to this exemption applying 'on an exceptional basis' has been removed.

The amended Draft Rules will be published, alongside this paper. The amended Draft Rules will then be submitted to the TRIS process, a notification system which requires Member States to inform the European Commission of any draft 'technical regulation' applying to information society services, before the technical regulation is adopted. Once a TRIS process is initiated, a three-month standstill

period comes into effect, allowing Member States or the European Commission to consider and provide views on the proposed regulation.

After the standstill period, An Coimisiún will consider any inputs received in the TRIS process and revise the Draft Rules, as may be appropriate. The finalised rules will published on An Coimisiún's website and communicated to VOD providers.