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 applications¹.

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.

¹ 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. The advantage for the US compared to EU is demonstrated by the fact that currently, cultural 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

Anita Debaere
Pearle* - Live Performance Europe
anita@pearle.eu

Marie Le Sourd
On the Move
mobility@on-the-move.org

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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2 Source Eurostat Highest levels of international trade for services, selected countries, 2021
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)**

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<td>Asociace profesionálních divadel České republiky</td>
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<td>Busker Artist Agency</td>
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CADÛ
Caroline Phillips Management
Copenhagen Opera Festival
Danish Artist Managers (DAM)
Dansk Teater
Day Four Management
Delage Artists
DF Artists
Dry Levee Entertainment
Dutch Music Export
DutchCulture
eigenARTevents.com - Timo Holstein
Endewerf Management
ESNS
Esther Schollum Artists Management
Étude Arts, LLC
Federación Estatal de Asociaciones de Empresas de Teatro y Danza (FAETEDA)
FES Orchestra
Fett Music
Fletcher Artist Management
Front 242
Full Spectrum
Fuzzbox BV
Gentlemangement
Gnome
Groove Music Productions
Hamburg Music Business e.V.
Harrison Parrott - Polyarts
Harrison Parrott DE
Harrison Parrott ES
Harrison Parrott FR
Harrison Parrott NL
Harrison Parrott UK
Headfirst Music
Heads Up mgmt
High Hat VZW
Hive M
Hopkinz.management & marketing
IMG Artists
Inside Jazz
Insignia Artists Management
Interclassica Music Management GmbH
Interessenverband Musikmanager & Consultants (IMUC)
International Theatre Institute - Czech centre

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