



# **GREENING EUROPEAN FILM POLICY**

## **TOWARDS A MORE SUSTAINABLE FILM AND TELEVISION INDUSTRY**

### **AUTHORS**

Pietari Kääpä (University of Warwick)  
Hunter Vaughan (University of Cambridge/Emerson College)

### **CONTRIBUTING AUTHORS**

Norma Cuadros  
Kate Moffat  
Vanessa Zarm

### **CONTRIBUTORS**

Ludóvica Chiarini  
Laurence Johnson  
Louise Smith  
Zsófia Szemerédy  
Júlia Tordai

# ACKNOWLEDGMENTS

This report is the culmination of ongoing collaboration between academic researchers and industry experts involved in the Global Green Media Network. We are grateful to the sustainability practitioners, film agency/commission and office stakeholders, and production workers across public and private sectors and throughout the film and television life cycle chain that have given their time and expertise in the pursuit of a more environmentally responsible industry future.

Funded by the University of Warwick and supported by the Minderoo Centre for Technology and Democracy at the University of Cambridge, the Greening European Film Policy project consisted of four major workshops held in 2023, co-organized and hosted by local partners in Ireland, the UK, Hungary, and Italy. The workshops included dozens of attendees, mostly in-person but also virtual, from local and surrounding regional industries. We thank the site organizers and hosts in Dublin (Anthony Muldoon from Screen Producers Ireland; Pat Brereton from Dublin City University), London (Laurence Johnson from Film London), Budapest (Zsófia Szemerédy and Júlia Tordai from Green Eyes), and Sardinia (Ludovica Chiarini, Gemma Lynch and Nevina Satta from Ecomuvi/Sardigna Film Commission), and all participants that contributed to these incredibly rich conversations around sustainability and screen production.

We are particularly grateful to the group of sustainability experts, affectionately dubbed the ‘Travelling Circus’, that attended multiple (or in some case all) of these events, as well as our report writing retreat: Ludovica Chiarini, Laurence Johnson, Louise Smith, Zsófia Szemerédy and Júlia Tordai. Their ongoing collaboration and passion for sustainable positive change is equal parts abstract inspiration and invaluable practical contribution, and the workshops and this report would not exist without them.

We also thank our contributing authors (Norma Cuadros, Kate Moffat, and Vanessa Zarm) for helping to synthesise and structure the vast amounts of information herein. Additionally, our gratitude to the Reviewers (Ludovica Chiarini, Laurence Johnson, Louise Smith, Inge Sorensen, Zsófia Szemerédy) whose input guided the final revisions. This has truly been a collective effort, and indicates growing interest from scholars, creatives, numbers people and craftspeople in the furtherance of a greener future for film, television, and streaming production.

# Table of Contents

Executive Summary	4
Introduction	7
Minimum Standards	12
Finance	20
Auditing	27
Conclusion	35
Bibliography	37

# 1 EXECUTIVE SUMMARY

**The effects of climate change present one of the greatest challenges to cultural and environmental heritage, ecosystem health, public wellbeing, economic stability, and social equality.**

While this is a wakeup call for a planet on the brink of a tipping point, responses to this crisis also present an opportunity to drive positive change in cultural values and industry practices - the creative screen (film, television, and streaming, or FTS) industries are no exception. These industries, with government policy support and financial incentivisation, must act, and act quickly in ramping up sustainability planning, skills, and value mandates. This will not only enhance their efficiency and strengthen their competitiveness in years to come but will position them as torchbearers in the emerging expansion of green economy strategies and creative industry climate action.

Public and private stakeholders in the European FTS sector have initiated environmental sustainability strategies and crafted green public-facing narratives, yet these initiatives have struggled to take hold and to be systematically deployed. Industry stakeholders are missing a crucial opportunity to get in front of this policy challenge, and would benefit greatly, in the short and long term, by collaborating to deploy and normalise standard green protocol.

Environmental sustainability in FTS production is currently relegated to localised practices, whether in terms of being studio specific, set by city or municipal authorities, or limited to national funding and auditing schemes.

Yet, as is demonstrated with the MEDIA strand of the Creative Europe programme<sup>[1]</sup> awarding funding for the design of an EU calculator in early 2024, multilateral continental and international policy and toolkits are in the process of catching up and establishing their autonomy. Such government and industry partnerships to shore up inclusive international and multilateral sustainability policy formation and practice implementation will have lasting benefits for individual national FTS industries, economies, and climate goals; furthermore, it will strengthen the EU's climate strategy and position the EU as a leader in the integration of creative industry and cultural norms into the battle against climate change.

The EU's new ESG (environmental, social, and governance) reporting regulations offer a valuable template for concerted efforts to build climate policy around transnational collaborative FTS production funding; it is urgent that these two paths merge, and that industry and governments work together to build capacity for a more aggressive shift towards a more environmentally and socially sustainable future. This will require dynamic forms of skill sharing, incentivization, and reportage - or, in broader terms, communication, leveraging and trust. Prioritising this shift will strengthen the EU and its member nations' potential for substantial climate action and will enhance the FTS industries' competitiveness in a global market increasingly driven by directives connected to sustainability.

---

[1] European Commission, The (2024) Creative Europe MEDIA Strand, available at: <https://culture.ec.europa.eu/creative-europe/creative-europe-media-strand>

The deepening threats of climate destabilisation may have global scope and scale, but their impacts, strategies for adaptation, and the capacity to act are often localised. Various EU members offer key examples for wider modelling, from Austria's pioneering tax incentive plan to Sardinia's dynamic connection between mobile production shooting fees and the protection of local biodiversity and cultural heritage. The EU has a strong history and existing blueprint for collaborative policy building and incentivising international co-production; however, integrating sustainability measures and protocol into multilateral policy and regulation has proven difficult. This is especially challenging as multinational production entities, including streamers-turned-content-producers like Netflix, employ their own sustainability policies and practices, and play a key role in the market.

This report addresses the state-of-the-field, best practices, and growing needs in sustainability policy and practice in the European FTS industry, with a focus especially on local-, state- and EU-level policies, a) to explore how policy can support the wide-spread institutionalisation of these practices, and b) to fill in gaps in the existing European FTS structure by recommending actionable and realistic solutions. Addressing three key interrelated phases of funding, production, and reportage, this report lays out three key recommendations:

## Three key recommendations:

### 1. Minimum Standards

establish standardised minimum sustainability expectations and norms, from development-stage planning to on-set baselines, that apply to both publicly-financed and commercial (privately financed) productions

### 2. Finance

adopt mandatory financial investment schemes for productions (including all incoming mobile productions and international co-productions) to link financial incentives with achieving directly verifiable reductions in environmental impact;

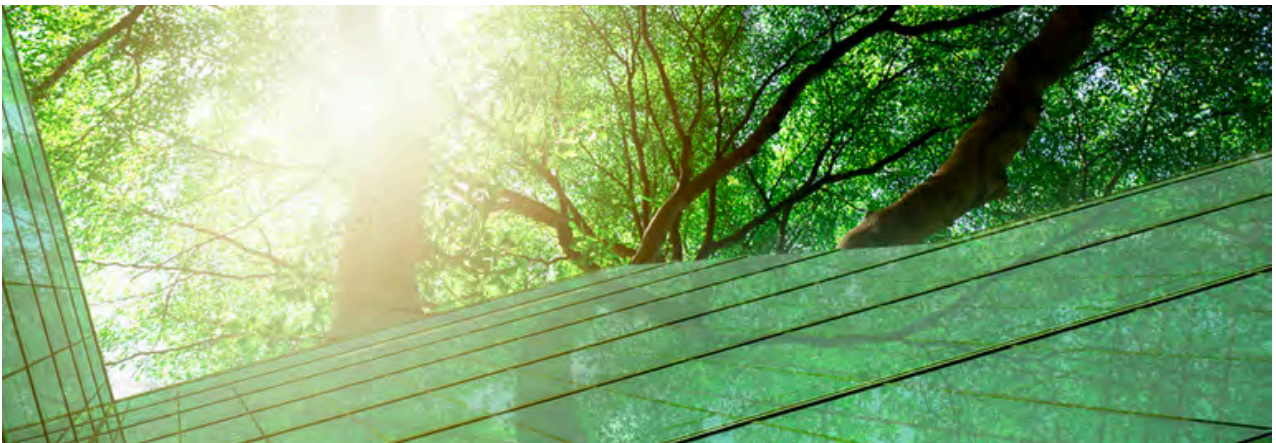
### 3. Auditing

establish third-party auditing and certification that focuses on exceeding minimum standards, with direct bearing on financial incentivization.



While there has been extensive development of green FTS guidelines, practical solutions, financial incentives and training, green practice has also become increasingly commercialised and subsumed into industrial competition and public relations management. However, many actors in the sector are now moving beyond these limitations, working collaboratively across private and public interests to develop minimum standards and push skill development and incentivisation for increasingly dynamic and effective environmentally conscientious practices.

The aim of this report, in connecting policy and practice, is to support such improved sustainability approaches and to propose avenues for rethinking such directions so that green FTS production becomes an active agent for positive change - the EU, with its increasingly stringent regulations and increased investment in sustainability, is uniquely positioned to consolidating a permanent, effective green screen industries transition.



# 2 INTRODUCTION

The Greening European Film Policy report explores the burgeoning field of environmentally sustainable - 'green' - production in the European FTS industries.

The report views green production as both an ethical advantage and a means to ensure the competitiveness of the European FTS industry. Sustainable production is an emerging competitive advantage for the FTS sector, where advanced development, embedding, and dissemination of sustainable production practices is a crucial factor in maintaining the competitiveness, if not the very viability, of the European FTS industries.

As the challenge of environmental sustainability gained traction and visibility over the last decades, the US and the UK have largely managed to centralise discourse and strategy in this area; in the US this began with the Production Guild Association (PGA) Green[1]

and now the Sustainable Production Alliance (SPA)[2], with BAFTA albert[3] quickly leading discourse over production, content and auditing metrics. Industry agencies, consultancies, production consortia, and media support organisations across the European continent have developed sustainable practice guidelines and policy frameworks, but have yet to find a concerted voice.

Both private investment and public funding underpin these incentives, leading to a proliferation of carbon calculators (often with different metrics and certification standards), environmental sustainability best practice guidelines, policies and frameworks that replicate the explosion of screen media production activity in Europe.

## GREEN PRACTICES



Include using sustainable materials, renewable energy sources, and dedicated sustainability teams to oversee and report on environmental impact.

---

[1] Producers Guild of America (2014) PGA Green Unified Best Practices Guide, available at: <https://greenproductionguide.com/wp-content/uploads/2014/04/PGA-Green-Unified-Best-Practices-Guide-REV.pdf>

[2] Sustainable Production Alliance (2024) Close Up: Scope 3 Emissions in Film and Television Production, available at: [1] [European Commission, The \(2024\) Creative Europe MEDIA Strand, available at: https://culture.ec.europa.eu/creative-europe/creative-europe-media-strand](https://culture.ec.europa.eu/creative-europe/creative-europe-media-strand)

[3] Albert (2024) BAFTA albert, available at: <https://wearealbert.org/>

This expedient expansion of sustainability frameworks has led to a situation where an increased level of attention on sustainability may undercut its environmental advances by, paradoxically, promoting an increase in the volume of production under the guise of sustainability. The use of, for example, virtual production that cuts back on certain production emissions but generates an entirely different set of material concerns. There is a danger in this expansion of activities that resembles the Jevons Paradox: while the provision of sustainability subsidies may lead to the industry honing in on the most accurate sustainable practices, they may also entice more production into a given location or facility that then undercuts any sustainability savings made. Thus, the validation of ‘greener’ production can be used to justify more production, not provide overall dropdown or absolute mitigation. Such concerns apply to the context of Europe on the whole where any arguments to green the sector through increased investment and capacity building may end up reinforcing the argument that there is no environmentally sustainable media production.

Yet, suggesting that the European FTS industry needs to cut back on engaging in international competition would not make pragmatic sense. Instead, we propose ways to position sustainability incentives as an integral part of such competition mechanisms. Such an intervention is especially important as the complexity of sustainability production in the European FTS industry lacks a coherent sectoral strategy that would bind and thus strengthen their individual industries. The demands and infrastructural differences across different industry locations encourages negative



competition and knowledge siloing, and undermines the industry’s ability to collect data, set standards, and establish best practice.

A European screen practice and policy framework has been on the table for several years as part of the Media and Audiovisual Plan[5], especially its action point ‘Towards a Climate Neutral Audiovisual Sector’, but these developments largely focus on calculating CO2 emissions instead of forging sustainable and long-term industry practices and policy. Furthermore, incentives like Cineregio’s Green Screen (European Regional Development Fund, 2017-2021) have led to early-stage development of the EURECA[6] calculator, but the integration between governance, infrastructure, practice and external value generation required to enhance industrial competitiveness is still lacking, especially as there are few bespoke regulations that apply to screen media production – most of the regulations are general reinforcement strategies that apply to all industrial sectors.

---

[5] European Commission, The (2020) European Media and Audiovisual Action Plan, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52020DC0784&from=EN>

[6] Eureka (2024) European Environmental Calculator, available at: <https://www.eurecafilm.eu/>

Furthermore, the European Commission's provision of funding for a project focusing on designing a 'common carbon emissions calculator', led by Seriotec, a cloud-focused specialist from Germany (2024-2027), acts as an important acknowledgement of the importance of addressing the proliferation of competing standards and practices. Yet, this will not be actualised until 2027, and does not address some of the critiques of current practices - especially the focus on calculation, which in turn perpetuates the fetishisation of carbon as an absolute metric, and on digital technology as a solution to the industry's sustainability challenges.

## SCOPE OF THE REPORT

This report is the result of collaborative co-production between key local stakeholders in UK and European film production hubs - Italy, Hungary, Ireland, and the UK. We include the UK in this report due to the close integration across the European green film and television sector, including policymakers, environmental consultants, production companies, and creatives, as well as the ongoing leading role UK organisations - in particular BAFTA - play in transnational sustainability policy and practice.

The focus is on mapping ongoing policy initiatives for sustainable production by evaluating how the dynamics of top-down governance and horizontal policy and communication incentivise, deploy, and assess on-the-ground practice across the different European local, national, and international production constellations. Key points of concern include addressing the dissonance evident in sustainability frameworks, funding schemes, technological benchmarks, and training guidelines - especially with incoming



mobile large budget productions, with their own standards for green production, shooting prolifically across these hubs.

To enhance the European FTS industry's international competitiveness and resilience and provide a holistic framework for positive unification, our focus is exclusively on feature film and high-end TV production as 1) most policy and practice measurements to date have been developed in relation to the production footprint of these formats, especially as 2) their production footprint tends to be the most visible and impactful, in part due to the material resources required for these productions - which directly correlate with their economic implications both in terms of investment and financial returns.



There are several areas this report will not address including various genres such as animation and documentary, but also the impacts of distribution and exhibition. This does not reflect a disinterest in such queries, but instead a strong suggestion for future research and policy - especially as digitalisation has deepened the environmental ramifications of effects-driven visual craft and online streaming as a mode of distribution and viewing.

Our aim is to evaluate the current state of policy development in green FTS practice, which, by and large, is focused on production emissions (including procurement and on-set practice). As such, the report will not address the substantial environmental or societal impacts of exhibition, distribution, and consumption as these impacts largely concern Scope 3 emissions arising from digital infrastructure. While theatrical exhibition has been addressed by MOIN (2022)[7], and digital processes have been evaluated in the Sustainable Digitalization report

(Vaughan and Kaapa 2023)[8], Scope 3 requires extensive further study. Furthermore, the Sustainable Production Alliance (2024) (SPA, a coalition of major US studios including streamers like Netflix and conglomerates like Warner) defines the minimum boundaries that apply to productions as encompassing 'emissions associated with the pre-production, principal photography, and post-production phases of content production. This boundary definition of production does not include distribution'(SPA 2024)[9].

The exclusion of downstreaming from these discussions can be perceived as problematic as it relegates responsibility to the enterprise-level, which then becomes embroiled in much more complex governance matters of the industry as a whole. While downstreaming must be addressed urgently in any discussions on 'net-zero' media production, for the purposes of this report, we will only focus on the concerns that apply directly to production.

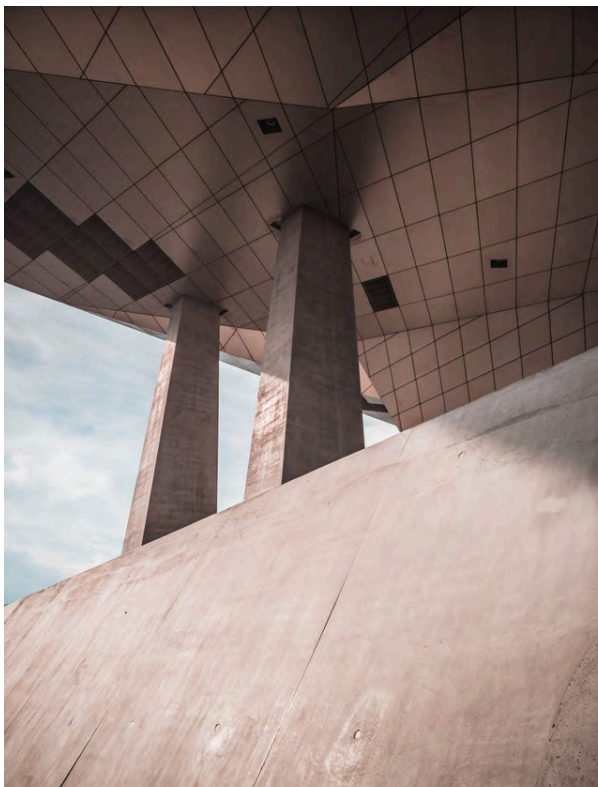
---

[7] MOIN Film Fund (2024) Green Filming, available at: <https://moin-filmfoerderung.de/en/green-filming>

[8] Vaughan, Hunter & Käpä, Pietari (2023) Sustainable Digitalisation, available at: <https://www.mctd.ac.uk/wp-content/uploads/2023/10/MCTD-SustainableDigitalisation-Report-WEB-compressed.pdf>

[9] Sustainable Production Alliance (2024) Close Up: Scope 3 Emissions in Film and Television Production, available at: [https://greenproductionguide.com/wp-content/uploads/2024/03/Sustainable-Production-Alliance\\_Scope-3-Whitepaper.pdf](https://greenproductionguide.com/wp-content/uploads/2024/03/Sustainable-Production-Alliance_Scope-3-Whitepaper.pdf)

# STRUCTURE AND AUDIENCE



By recommending actionable and realistic solutions, the Greening European Film Policy report explores how policy can support the wide-spread institutionalisation of sustainable FTS production practices. To do so, the report establishes a framework based on three interconnected ‘pillars’:

1. **Minimum Standards** — establishing a multilateral framework of standards that act as a realistic indicator of the most basic measures to be adopted into policy.
2. **Finance** — exploring how financial incentives and economic priorities underpin the successful adoption and implementation of minimum standard sustainable practices.
3. **Auditing** — addressing the pervasive lack of metrics and data benchmarks through enhanced transparency in production protocols and reports.

These elements - or pillars, as we call them - are inherently intertwined and form a part of a larger infrastructural coordination of resources and policies that would not make sense separately. They consequently form the basis for the key recommendations of this report, which are directed at: individual and institutional stakeholders; European agencies and institutions with substantial capacity and ability to guide the development of green production, educational institutions implementing sustainability into their curricula, as well as creatives innovating with content and production demands. On the EU level, such mechanisms are essential in ensuring globalised competitiveness while ensuring that sustainable production concerns are both local and culturally specific.

On the ground, it is often the broadcasters, streamers, and studios that face the majority of the economic and regulatory risk and, consequently, develop and implement sustainable protocols. Any recommendations for policies to be developed by film offices, agencies and commissions must take into account the competitive landscape where the sustainability protocols of multinational companies may exceed the domestic minimum standards in place. Hence, a balanced perspective on policy-based incentivization and commercial competition is required throughout this report to account for the 2 speeds at work: the often enhanced standards of commercial studios (partially due to their ability to invest capital in sustainable practices, further in part due to the reputational benefits of such practices) and domestic productions that often require incentivization and regulatory oversight.

The proposed recommendations in these three areas are based on identifying gaps in policy development, institutional support, best practice, financial means, and creative considerations to outline solutions to ensure that the European FTS landscape emerges as a global hub for sustainable production.

# 3 MINIMUM STANDARDS

Across Europe, sustainability incentives and guidelines play a key role in the transition to sustainable practice, with numerous nations and localities implementing policies that necessitate minimal environmental impacts from film productions.



The adoption of minimum standards is significantly motivated by the desire to mitigate carbon impacts, imprint best practices, manage costs of production, and to anticipate the need for regulatory compliance. Furthermore, establishing minimum standards provides an opportunity to develop Corporate Social Responsibility (CSR) initiatives that are increasingly central to the strategic agendas of film companies, aimed at enhancing their brand reputation and fulfilling stakeholder expectations.

## OUTLOOK ACROSS EUROPE

Sustainable film practices across European countries exhibit notable variations due to a range of factors, including local environmental regulations, industry development levels, availability of resources, and cultural attitudes towards sustainability. Countries, such as Germany and the Scandinavian nations, with stricter environmental laws supported by well-established government protocols encouraging environmental responsibility, typically enforce higher general environmental standards. These broader policies often include regulations or guidelines that impact various industries, including entertainment, more holistically, in an effort to ensure that environmental considerations are uniformly integrated into economic activities.



As public awareness and concern about environmental issues grow, stakeholders in various industries, including FTS, are pressured to adopt sustainable practices. Yet, the availability and adoption of green technologies differ significantly across Europe, propelled by complex logics of political economy, political ecology, and resource access. Nations with advanced technological infrastructure, such as France and Germany, have better access to energy-efficient film production technologies, which enhances their ability to implement sustainable practices effectively, including mandatory requirements for publicly-financed production. Accordingly, their minimum standards tend to reflect the advanced modes of their industrial circumstances. For example, Germany requires not only sustainability coordinators to manage productions with extensive reporting, but also such essential areas as renewable energy sources for all studio-based productions and a total ban on air travel for anything that takes less than 5 hours on a train (ie. covering most of Germany).

Such minimum standards exist in different forms in most European locations, but the level of local expertise and resources can also impact the adoption of these practices. Larger film markets, including the UK and France, generally have a greater number of professionals trained in sustainable production methods compared to smaller or less economically developed locations. Additionally, cultural attitudes towards environmental issues influence how film productions approach sustainability. For instance, productions in Germany or Ireland, where there is a strong cultural emphasis on environmental consciousness, are often more diligent in minimising ecological impacts.

The extent of collaborations between governmental bodies, non-governmental organisations, and the FTS industry varies by nation and can significantly affect the resources available and the innovative approaches to sustainable filmmaking. These variations highlight the complexities of implementing sustainable film practices across Europe, each influenced by unique local challenges and opportunities.

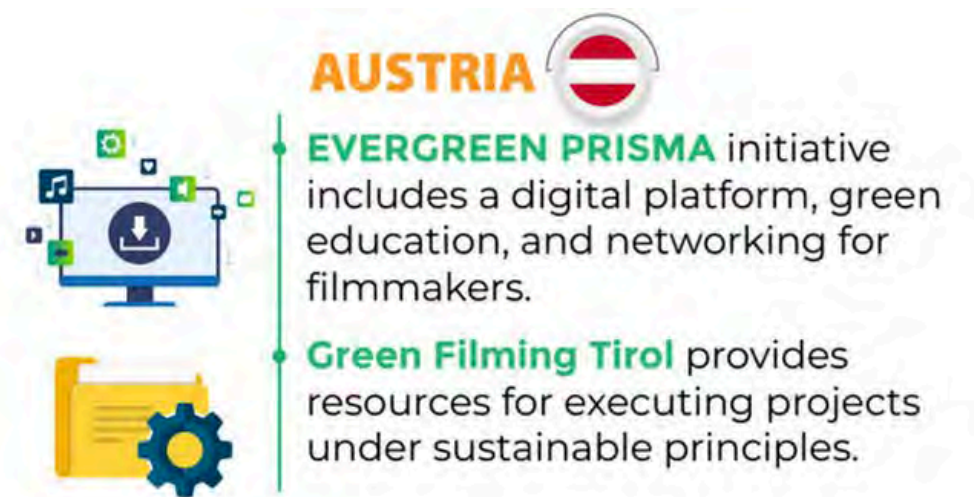


## EUROPEAN PROGRAMMES

Programs like Green Screen[10] and Green Regio[11] have been pivotal in shaping a more sustainable film industry across Europe. These programs provide vital platforms for knowledge exchange, the development of tools like carbon calculators, and the promotion of sustainable operating methods. At the same time, individual national programmes cover most European countries, which have been organised in the below by geocultural location. The list is not exhaustive but is included to highlight prominent patterns in policy and practice and the often different approaches they have historically taken.

## CENTRAL AND EASTERN EUROPE

In Central and Eastern Europe, the Austrian situation exemplifies the complexity of green production protocols. The Austrian Film Commission runs the Criteria Catalogue of Ecological Minimum Standards for Austrian Cinema Film Productions ÖFI/ÖFI+ (Österreichisches Filminstitut / Austrian Film Institute)[12] which operates on a national level. In addition, a range of regional incentives complement this protocol. For example, the Lower Austrian Film Commission's (LAFC) EVERGREEN PRISMA[13] initiative includes a digital platform, green education, and a networking hub. This initiative, which has received international accolades, supports both professional and upcoming filmmakers with training on green filming techniques and essential tools.



[10] Green Screen (2024) Greening the Creative Industries: Improving Policy Practices for the European Audiovisual Industry, available at: <https://projects2014-2020.interregeurope.eu/greenscreen/>

[11] CineRegio (2012) Green Regio, available at: [https://www.cineregio.org/subgroups/green\\_regio/](https://www.cineregio.org/subgroups/green_regio/)

[12] Austrian Film Institute (2023) Catalogue of Criteria of Minimum Ecological Standards for Austrian Cinema Film Productions ÖFI / ÖFI+, available at: [https://filminstitut.at/wp-content/uploads/2023/08/Catalogue-ecological-standards-Austrian-cinema-film-productions-OeFI\\_OeFI\\_Version-1.0\\_01.01.2023\\_engl.pdf](https://filminstitut.at/wp-content/uploads/2023/08/Catalogue-ecological-standards-Austrian-cinema-film-productions-OeFI_OeFI_Version-1.0_01.01.2023_engl.pdf)

[13] Lower Austrian Film Commission (2023) EVERGREEN PRISMA – Sustainable Filmmaking, a Pioneering Contribution to Greater Ecological, Economic and Social Responsibility, available at: [https://www.lafc.at/downloads/LAFC\\_Evergreen\\_Highlights\\_2023\\_05\\_EN\\_Final\\_V4.pdf](https://www.lafc.at/downloads/LAFC_Evergreen_Highlights_2023_05_EN_Final_V4.pdf)

On a federal level, the Cine Tirol Film Commission has launched Green Filming Tirol[14], providing filmmakers with resources to execute their projects under sustainable principles. The IDM Film Commission Südtirol has developed the Green Shooting certification[15], which is specifically tailored to the unique geographical and cultural context of South Tyrol. This certification addresses multiple facets of production sustainability, from reducing energy consumption and managing waste to promoting the use of sustainable transportation and catering options.

While these federal Austrian approaches encourage integrating environmental considerations into every stage of the film production process, most of the Central European minimum standard frameworks tend to only operate on the level of voluntary suggestions. For example, the Slovak Film Commission has been part of the Green Screen program, offering resources for environmentally friendly filming, but is still lacking ‘training for environmental consultants, the development of a carbon calculator for the audiovisual sector, and a financial bonus system for ecologically engaged productions’ (Slovak Film Commission)[16]. Meanwhile, the Hungarian Film Institute[17] promotes

guidelines that largely draw from established international best practices. Similarly, in the Czech Republic, the Czech Film Commission supports Green Filming[18] by The Audiovisual Producers' Association, which provides a comprehensive manual and practical tools for green filming, drawing inspiration from both Slovak and American initiatives. While these are localised to the Slovakian, Hungarian and Czech filming conditions, they remain recommendations only with no binding agreements to enforce productions to adopt them.

## WESTERN EUROPE

In Northern and Western Europe, countries such as Belgium, France and Germany have been early movers in green production. For example, in France, the Eco Prod consortium has developed tools like the carbon calculator (Carbon Clap)[19] and guides for eco-production since 2012, establishing sustainability reporting as a minimum standard for public funding in 2024. In Germany, the MOIN Film Fund and other local commissions like Berlin Brandenburg and Stuttgart have promoted green filming standards since 2012. Notably, as with France, Germany has implemented nationwide ecological reporting requirements for all publicly funded productions as of July 2023.

---

[14] Cine Tirol Film Commission (2024) Green Filming Tirol, available at: <https://www.cine.tirol/en/green-filming/>

[15] Film Commission Südtirol, IDM (2024) Green Shooting, available at: <https://www.film.idm-suedtirol.com/en/film-commission/green-shooting>

[16] Slovak Film Commission (2020) Guidelines for Sustainable Filming, available at: <https://www.filmcommission.sk/606-en/guidelines-for-sustainable-filming/>

[17] Hungarian Film Institute, The (2024) Green Light to Sustainable Production, available at : [https://nfi.hu/files/img/articles/aed91390e86d561e9828fb3a844b6209/zold\\_kiadvany\\_EN%20\(2\).pdf](https://nfi.hu/files/img/articles/aed91390e86d561e9828fb3a844b6209/zold_kiadvany_EN%20(2).pdf)

[18] Association of Audiovisual Producers (2021) Green Filming, available at: <https://greenfilming.cz/s-kym>

[19] Ecoprod (2024) Carbon'Clap, available at: <https://www.ecoprod.com/en/carbon-clap.html>

In Belgium, the Screen Brussels Film Commission is dedicated to sustainable development and the circular economy through its Eco-filming project[20]. Meanwhile, Flanders has been a frontrunner in sustainable filmmaking since 2013, driven by the Flanders Audiovisual Fund (VAF)[21] and Screen Flanders, which promote the use of sustainability tools, including VAF mandating calculation and reporting of a sustainable production in order for them to receive the final 10% of their funding. Wallimage has created incentives for green filming, offering extra points during co-production sessions for films with a green plan.

## NORTHERN EUROPE

In Northern Europe, specifically the Nordic countries, sustainable practices have been slow to develop, with Sweden leading the way with provincial organisations such as Film i Väst developing a checklist of guidelines for productions. Other organisations like The Northern Norway Film Commission have established sustainable production standards and certifications, while Finland has adapted BAFTA albert as its production standard. Denmark is building capacity through strategic plans like Vision Denmark with the Danish Film Institute investing in development. Simultaneously, there are a range of multinational incentives, like the Oslo-based Green Producers Club[22] and the Nordic Ecomedia Alliance[23], that focus on co-production, but the baseline continues to be the recommendation of basic standards on carbon calculation and emissions reduction.



[20] Screen Brussels (2023) Eco-filming, available at: <https://screen.brussels/en/eco-filming>

[21] VAF (2024) Flanders Audiovisual Fund, available at: <https://www.vaf.be/en>

[22] Research Council of Norway, The (2024) Green Producers Club, available at: <https://www.greenproducers.club/>

[23] NEMA (2024) Nordic Eco Media Alliance, available at: <https://www.nema.network/>

**NORWAY**



**Northern Norway Film Commission**

has established sustainable production standards and certifications.



## LESSONS FROM INDIGENOUS FILMMAKING

The International Sami Film Institute (ISFI) embodies a model of sustainable practice that is not outwardly incentivised by the operational, regulatory or reputational risk categories identified above. This framework involves groups of individuals united by a common interest, who improve their skills and knowledge through regular interaction. For ISFI, this interest includes environmental sustainability, which is intricately woven into their filmmaking strategies.

The practice of fostering continuity and knowledge-sharing across generations of Sámi film producers showcases the value of mentorship and the transmission of cultural and professional experience. This approach emphasises the power of 'smallness,' where smaller, focused settings such as tailored classes enhance learning and skill development. Moreover, the practice of mentoring ensures close contact and personalised guidance, strengthening the professional community.

ISFI's commitment to sourcing local talent and utilising local resources and companies not only boosts the local economy but also reduces the environmental impact associated with larger-scale productions. This localised focus is a blueprint that other industries can adopt to minimise their carbon footprint and enhance community engagement.

Furthermore, the role of cultural events, such as the Sámi festival Dellie Maa, in promoting environmental awareness and climate justice demonstrates how industries can serve as conduits for broader societal messages. These festivals are not only platforms for cultural expression but also act as key players in the environmental advocacy space.

Adopting ISFI's model, other industries can create robust, sustainable practices by fostering communities of practice focused on environmental sustainability, nurturing local talent, leveraging local resources, and using their platforms to advocate for and implement eco-friendly policies.

## SOUTHERN EUROPE

In Southern Europe, the Portugal Film Commission has released the Green Shooting Portugal guide[24] to encourage sustainable practices in the audio-visual sector. Meanwhile, multiple commissions in Spain, including those in Barcelona, Catalonia, and the Canary Islands, have developed guides and protocols to facilitate sustainable practices in FTS production. As elsewhere in Europe, there is a heavy emphasis on the basic requirement to report emissions against a set of guidelines (ie. minimum standards in these contexts involves measuring emissions and noting reductions, leading to localised certification).

Italy's Green Film initiative is a notable pan-European effort involving various film commissions and funds which will be discussed in depth below. In particular, the Trentino Film Commission, located in Trentino, Northern Italy, has spearheaded the Green Film Protocol[25]. Initiated in 2017, this protocol aims to guide film productions towards more environmentally conscious practices. It was designed to mitigate potential ecological disruptions such as waste production and

excessive energy use, with the protocol eschewing complex carbon footprint calculations in favour of a practical, actionable approach, making it particularly appealing to productions with limited sustainability resources.

The success of this protocol in Trentino has led to its broader adoption across various European locales, including Belgium's Walloon region, Catalonia, the Basque Country, Mallorca, Greece, Iceland, and Denmark—some of which have adopted it as a mandatory standard, illustrating the protocol's flexibility and effectiveness, resonating with different local needs while promoting common sustainability goals. This mandatory adoption further underscores the influence of Italy's initiative beyond its borders, setting environmental benchmarks that others are following.

The protocol's adoption by some members of the Green Group of Cineregio, the association of national and local European film funds, marks a significant step towards standardising sustainable practices across the film industry in Europe. By endorsing the Green Film Protocol as a standard tool, Cineregio has facilitated a unified approach to ecological responsibility, making it easier for film productions across member regions to adopt sustainable practices.



---

[24] Portugal Film Commission (2021) Green Shooting Portugal: Guide to Sustainable Filming, available at: [https://portugalfilmcommission.com/wp-content/uploads/2021/05/PFC\\_Green-Shooting\\_EN.pdf](https://portugalfilmcommission.com/wp-content/uploads/2021/05/PFC_Green-Shooting_EN.pdf)

[25] Trentino Film Commission (2023) The Green Film Protocol, available at: <https://www.green.film/>

## CONCLUSION

Adopting sustainable practices is fraught with challenges, notably the significant initial investments required for green technologies and the comprehensive training of personnel. The absence of standardised practices across the continent complicates the adoption of uniform sustainability measures, compelling productions to navigate a diverse set of localised standards. Furthermore, the integration of new technologies often necessitates a complete overhaul of established production workflows, potentially leading to scheduling disruptions and the need for extensive crew training.

To foster a sustainable filmmaking culture across Europe, it is imperative to leverage the successes of local initiatives like those in Trentino and Südtirol to formulate a cohesive sustainability strategy, and highly industrialised industries might learn much from the perspectives of Indigenous film cultures. These protocols and practices not only serve as practical models for other nations but also act as catalysts for broader industry changes towards environmental responsibility. They can complement the extensive shooting of studio-commissioned productions in these locations, which have their own sustainability expectations and approaches (such as with Netflix requiring a sustainability coordinator on all productions), thus providing a sort of state-industry dialectical movement towards more stringent sustainability protocol.



Incentivization by public organisations like film agencies and commissions should thus emphasise ongoing training of their workforce to both compete with and collaborate with these incoming productions to ensure the widespread adoption of sustainable practices. The continued development and refinement of protocols like The Green Film Protocol are crucial, ensuring they remain relevant and effective against the backdrop of evolving environmental challenges and technological advancements. The full-scale integration of minimum sustainable practices in the European film industry can set a global precedent, blending creative endeavours with environmental stewardship to compete with other global production hubs, all now offering some variation of environmental sustainability.

## RECOMMENDATIONS

1. Governmental and EU-wide organisations (especially screen intermediaries such as film commissions and agencies) should establish minimum standard benchmarks that clearly apply to the creative and cultural industries (FTS in particular) and align these with regulatory compliance;
2. Local film commissions (federal; regional; municipal) should develop minimum standard sustainability protocols based on the aforementioned governmental standards to address the particularities of their economic, cultural, political and environmental contexts, and demand and incentivize reporting on production implementation;
3. With minimum standards in place, industry should continue developing and instituting more environmentally responsible protocol and norms and maintain its role in leading positive change in this area by pushing the envelope on accepted standards.

# 4 FINANCE

A wide variety of national and local financial film incentives operate across the European Union, including the reduction of tax payments for international productions shooting in European locations. These incentives are important in the context of this report as they emphasise the interface between domestic/intergovernmental policies and the competitive benchmarks set by major studios and other incoming productions.

## TAX INCENTIVES

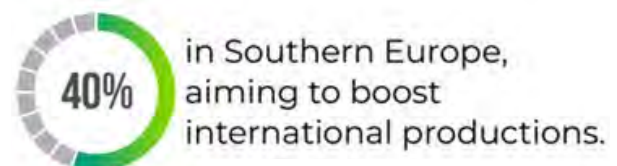
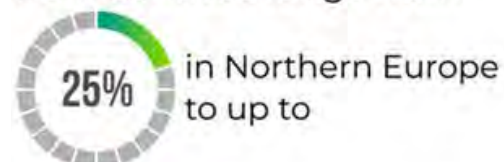
Tax incentives start from 25% in Finland, Sweden and the Baltic States, to 30% in Hungary and Germany, and increase to a generous 40% across Southern European nations such as Greece as well as provincial locations like Sardinia and Malta[26]. Such incentives capitalise on a larger competitive shift as these countries build on their local production networks, workforce, and versatile topography to offer desirable filming locations. Consequently, the tax relief system dominates the market for incentivising international productions to shoot in European locations, including a string of multilateral agreements and co-productions amongst neighbouring countries (especially those sharing a language).

Embedded in these developments are tax incentives that focus on green production, such as Austria's introduction of a 5% tax rebate for sustainable production in 2023. Yet, with at least 17 EU countries offering tax incentives for film production, only five offer a definitive

financial scheme, or grant, that is explicitly tied to sustainable film production, of which we have selected case studies here. Subsequently, this section on film financing will be divided into an introduction of the largest EU funding bodies—Creative Europe and Eurimages—before presenting selected case studies of both cash rebate and subsidy models, spotlighting their relationship to green production.

### INCENTIVE RATES

EU incentives range from



---

[26] The Italian tax credit system is currently undergoing revision, highlighting the fact that policies must be responsive to prevailing environmental, cultural, political and economic concerns. See The Hollywood Reporter (2024): <https://www.hollywoodreporter.it/politica/pd-ancora-nulla-sul-tax-credit-del-cinema-il-ministro-sangiuliano-cosi-affossa-industria/105824/>

# CREATIVE EUROPE

Creative Europe was established in 2012 as a funding initiative by the European Union to support creative and audiovisual projects across Europe. Stretching across 25 EU countries, its two main objectives are 1) to preserve and promote the artistic and cultural diversity of Europe, and 2) to foreground the explicitly competitive and economic potential of the European audiovisual sector. For the initial funding period (2014-2020), Creative Europe's budget consisted of €1.46 Billion. As of 2024, its second phase (2021-2027) offers an increased €2.44 Billion – signifying a rising stream of monetary support for the film industry. Yet, sustainability receives only incidental recognition in its 'Policy Support and Awareness raising' goal, which pledges:

**'information exchange in the areas of access to finance, digital and green transition, diversity and in the application of the Audiovisual Media Services Directive' [27]**

In 2023, with the outcomes of their Greening Creative Europe Programme (European Union 2023), the funding programme suggested: 'Cultural and creative activities can support the transition to a green economy by promoting sustainability and environmental awareness. At the same time, the programme itself will strive for carbon-neutrality by promoting sustainable means of transport and environmentally responsible behaviours'. [28] However, this indication of a 'green transition' is employed in language only, as there is no specific, distributed budget outlined to fulfil these sustainability aims.



## MAJOR FUNDING BODIES



Creative Europe and Eurimages are key players, with Creative Europe entering its second phase **(2021-2027)** with a budget increase to **€2.44 BILLION**

[27] European Union, The (2024) Policy Support Cluster, available at: <https://culture.ec.europa.eu/creative-europe/creative-europe-media-strand/policy-support-cluster>

[28] European Union, The (2023) How Creative Europe aims to go Green, available at: <https://culture.ec.europa.eu/news/how-creative-europe-aims-to-go-green>

# EURIMAGES

Eurimages, active since 1989, is the cultural support fund of the Council of Europe / Conseil de l'Europe. In January 2023, its sustainability strategy required projects to be assessed according to "the existence of measures implemented to reduce the environmental impact of the co-production project"[29]. As of February 2024, Eurimages requests mandatory information from productions on their sustainability efforts including how criteria such as certification and carbon calculation have been met.

An additional aim for Eurimages is to offer a platform for sustainable film production training, the development of which will be lead by Ecoprod with a set of national partners (such as EcoMuvi in Italy).[30] Specifically, the fund will foster the development of a digital e-learning site on sustainable filmmaking practices, emphasising international co-productions as a priority within their sustainability strategy.



## Definitions:

### Tax incentives

encourage film production by removing a percentage of income tax owed to the national state.

### Financial grants

are directly linked to sustainable film measures and can be defined as a sum of money provided by national agencies to subsidise the cost of film production, and which largely take two forms:

### Cash rebates

are an incentive scheme which offers a percentage return based on a minimum monetary expenditure for small and medium-sized film productions.

### Cash refunds

complement rebates by similarly offering returns in the shape of a reimbursed percentage once a minimum expenditure is reached, but they tend to be used with productions that have a higher budgetary value.

[29] Eurimages, Council of Europe / Conseil de l'Europe (2023) Sustainability Strategy, available at: <https://www.coe.int/en/web/eurimages/sustainability-strategy>.

[30] Council of Europe (2024) Do You Want to Learn about Sustainability in Films, available at: <https://www.coe.int/en/web/eurimages/-/do-you-want-to-learn-about-sustainability-in-films->

## THE TAX INCENTIVE MODEL

Intergovernmental frameworks are often lacking in consolidated finance-based investment in green production, focusing instead on establishing measurements for European production, as with the EC's 2024 common calculator incentive; however, individual national and local policies are often much more proactive in this area, especially as they must remain competitive to attract incoming productions.

The national policy case studies outlined below (Austria, Germany, Portugal and Ireland) have been chosen due to either offering innovative incentives that can shift the sector's approach, or because they mandate advanced compliance for sustainability reporting. While Northern and Eastern European countries such as Denmark, Finland, Hungary, Poland, and Romania have begun to employ green consultants and develop national frameworks, they are not included in this discussion due to the early stage of their green incentive planning. Consequently, they gesture at the systematic inequality in financial resources allocated to tackle sustainability in these industries across the European landscape.



## AUSTRIA'S GREEN BONUS MODEL

The national policies implemented by Austria's film commissions present a desirable model for incentivizing sustainable measures across production. Since 2021, the ÖFI, BMKÖS (Bundesministerium für Kunst, Kultur, öffentlichen Dienst und Sport / Ministry of the Arts, Culture, Civil Service and Sport), and FFW (Film Fonds Wien / Vienna Film Fund) updated their funding guidelines to include additional costs related to sustainable filmmaking. By doing so, productions employ a 'Green Filming Officer' to ensure environmentally-friendly measures across production—thereby conforming to Austria's Ecolabel 76 criteria[31]. The implementation of this Ecolabel Guideline encourages a streamlined increase in recognized Green Filming projects.

In January 2023, Austria introduced ÖFI+, a new green funding program administered by the Austrian Film Institute. This includes a 5% booster incentive model which enables support for international productions and Austrian feature films. This prerequisite demands that the criteria of ecological sustainability have been demonstrably met throughout the production process. Crucial to note here: the 5% green bonus is a voluntary bonus. Despite its recognition within cross-border productions, such as co-productions with Germany, positioning the green bonus as an optional addition severely limits its power as a regulatory intervention. Consequently, while this financial incentive is a potential game changer, in the long run, shifting the financial discourse from hypothetical 'bonuses' to mandatory prerequisites would be a more efficient step towards equating sustainability with effective economic incentives.

---

[31] Austrian Ecolabel / Österreichisches Umweltzeichen (2017) Ecolabel Guideline EL 76 Green Producing in Film Productions and on TV, available at: [https://www.umweltzeichen.at/file/Guideline/UZ%2076/Long/Uz76\\_R1a\\_Green%20Producing\\_2017\\_EN.pdf](https://www.umweltzeichen.at/file/Guideline/UZ%2076/Long/Uz76_R1a_Green%20Producing_2017_EN.pdf)

## PORTUGAL'S INCENTIVIZATION MODEL

Portugal presents another sustainable film strategy combining a generous tax incentive system with a thorough auditing process. The 2021 Green Shooting Portugal guide by the Portugal Film Commission offers sustainable measures, including a waste separation system and a strategy for environmental mitigation. Crucially, from April 12th 2024, the guideline requires an environmental sustainability plan laid out by a specialized green shooting consultant which identifies sustainable suppliers and monitors material recycling strategies. The completion of a sustainability report and use of a carbon calculator to measure emissions equates to 1 point of the Cultural Assessment Test that decides on the qualifications of a production for the incentive required for the Cash Rebate. The significance of environmental practices is increased in the qualifiers for the Cash Refund where an environmental audit of the production will provide 2 points of the Cultural Test.

While Portugal has achieved an effective system linking their tax incentive scheme with an auditing process, promoting a more sustainable mode of film financing, it is worth remembering that the 1-2 point sustainability inclusion is out of a total of 40.

## GRANTS

The grant model offers a bursary to an audiovisual project that provides evidence of their sustainable filmmaking approach. Outlined below are Ireland and France, whose subsidy scheme is directly linked to sustainability. Whilst other countries such as Hungary, Slovakia, Croatia, Bulgaria, and Latvia implement tax incentive schemes (ranging from 25%-35%), these are not linked to any explicit sustainable steps within film production.

## IRELAND'S SUSTAINABILITY INNOVATION FUND

Screen Ireland / Fís Éireann offers incentives that specifically encourage a more sustainable approach to filmmaking in an attempt to achieve Net Zero across the industry by 2025. To do so, Screen Ireland has implemented the following strategies:

1. **Reducing emissions** through changing practices and behaviours and investing in efficiency measures. Under a sustainability advisor, this includes a strategy development for the reduction of energy use, such as switching to renewable energy versus diesel generators. A circular economy is used for waste management, alongside electric vehicles for transport; and
2. **Investing in nature-based solutions** to offset any unavoidable emissions and implementing local initiatives to protect and monitor biodiversity around a production site.



Since 2022, Screen Ireland requires the use of a carbon calculator to measure each production's carbon impact. Most recently, Screen Ireland created the Sustainability Innovation Fund, offering grants of up to €25,000 (excluding tax) to be evaluated by Screen Ireland. Productions must signify that costs are directly related to the sustainability initiative, alongside a mandatory prerequisite of a written report after production is complete. This report should entail what green approach was taken, its environmental benefits, and how this knowledge can be implemented across future projects, cementing a progressive, long-term form of green practice. If not submitted, the funding body retains 25% of the grant – thereby enforcing a strict, standardised funding scheme with punitive leverage.

[32]



## FRANCE'S ECO-CONDITIONALITY SCHEME

### Plan Action! & eco-conditionality of CNC subsidies

The film funding process in France has adopted a subsidy approach to promote 'eco-conditionality' (ie. production funding is 'conditional' on the basis of fulfilling green requirements)[33]. Film France, a department of the CNC (Centre National du Cinéma et de l'image animée / French National Centre for Cinema) is the administrative institution that mandates the legislative aspect of French film production.

From 2021, a public policy plan was implemented to ensure an ecological transition of the film industry which provides a first step in situating the wider French audiovisual industry as a more sustainable sector. As of March 2023, the CNC's prerequisite to fulfil this 'eco-conditionality' is the submission of a provisional and final report on carbon emissions generated during production. From January 2024, submitting this double carbon footprint report has been escalated into a mandatory condition to obtain the CNC's production subsidies. Whilst this eco-conditionality is not applicable for international productions, France's sustainable subsidy system offers another effective model for rigorous and financially mandatory green production.

---

[32] Screen Ireland / Fís Éireann (2023) Sustainability Innovation Fund - Pilot, available at: <https://www.screenireland.ie/funding/production-loans/sustainability-innovation-fund-pilot>

[33] CNC, Film France (2023) Green Filming: Plan Action! & Eco-conditionality of CNC Subsidies, available at: <https://www.filmfrance.net/en/guidance/green-filming/>

## CONCLUSION

Out of the 27 EU countries, the four case studies outlined here demonstrate various approaches to linking financial incentives with sustainable practice. Nonetheless, the overarching strategy across most European policy remains focused on mandating reporting or offering tax incentives. While they provide an important first step, these approaches do not offer any real fiscal urgency towards consolidating sustainable practices through financial policies. As most supportive measures remain voluntary additions or are used to incentivize more incoming productions, what needs to be principally set in place is 1) the integration of an allocated grant for green funding through organisations such as Creative Europe or Eurimages, and 2) the linking of such incentives with verifiable certification processes.

## RECOMMENDATIONS

1. National, inter-governmental (ie. Europe-wide) and local (regional; municipal; federal) governance should adopt a green funding system that offers, at minimum, green tax incentives for incoming productions, but, optimally, should focus on developing a system of specifically-allocated grants as part of their subsidy model;
2. FTS commissioners should establish mandatory requirements for green production incentives and introduce financial penalties for not fulfilling the standardised green criteria
3. Industry stakeholders should adopt a transparent approach to declaring how subsidies and incentives directly benefit green practices, production workflows and management, and use this data to scale-up a more sustainable approach to FTS financing.



# 5 AUDITING

Over the last decade, European film organisations and private consortia have developed toolkits outlining strategies for productions to voluntarily reduce their environmental impacts across various categories. Most of these guidelines agree on considering sustainability action plans, transportation, accommodation, energy, materials, waste management, and communication as a route guide to assist producers towards reduction of carbon emissions. Beyond the incentivisation and enactment of green production strategies a critical question remains: To what extent do these efforts translate into concrete actions that demonstrably reduce the environmental impact of productions, and how can this be measured and verified?

The opportunity to be recognized as a green production by a third party can be a driver to compel production companies, studios, streamers, and other industry stakeholders to embrace green practice. Thus, this section focuses on auditing processes related to green production practices in the European Union. Specifically, it will examine how recognition systems like labels and awards influence

decisions to reduce carbon emissions and the extent to which these systems are accompanied by rigorous third-party auditing. Although minimum standards frameworks exist in at least 12 European countries, it is imperative that more critical attention is devoted to their veracity and applicability, which can only be translated through reportage and auditing.



# GREEN PRODUCTION RECOGNITION SYSTEMS

Information gathered from industry professionals and policymakers across Europe and the UK reveals various types of recognition for productions. These range from self-reported checklists (e.g., PEACH)[34] to action plans with minimum goals (albert), and third-party audits verifying evidence collected during production (EcoMuvi[35], GreenFilm[36], EcoLabel, GreenMotion[37], and EcoProd). These recognition systems typically use minimum standards established by private organisations, consultants, or film commissions which do not necessarily align with one another (although EcoMuvi is officially recognized by Accredia, the Italy's national Accreditation Body).

Furthermore, although some countries such as Germany and Austria mandate the adoption of minimum standards to reduce emissions for publicly-financed productions, they prioritize reportage of carbon emissions by the end of each project. While auditing is required by some tax incentive and grant programs, these practices largely depend on a good faith process where productions report their emissions, are not verified, and no further requests to demonstrate the impacts of such claims are required.

While the development of minimum standards and financial incentives has led to some standardisation of green practices across the EU, what remains to be set in place is an auditing process to identify loopholes or potential needs of improvement. Instead, most productions are content with public recognition in the form of an award, seal, or label to highlight that sustainability has been considered in production, yet none of these programmes and incentives establish minimum reduction targets for CO2 emissions in each reported category (energy, transportation, materials, waste). There is a clear distinction between awarding recognition based on self-reported practices (where trust in the applicant's good faith is crucial) and granting a certificate through verified third-party audits. The latter involves on-set visits to witness practices first-hand and reviewing evidence demonstrating compliance with minimum standards set by local, national, or international authorities.



---

[34] Green Production Guide (2024) Green Production Guide Toolkit, available at: <https://greenproductionguide.com/tools/>

[35] Ecomuvi (2024) EcoMuvi Certification, available at: <https://www.ecomuvi.eu/>

[36] Green Film (2024) Green Film Rating System and Certification for a Sustainable Film Production, available at: <https://www.green.film/>

[37] Green Motion (2024) Ökologische Standards und Label Green Motion / Ecological Standards and Label Green Motion, available at: <https://www.green-motion.org/>

A more involved form of recognition involves submitting evidence after production is completed. Here, regardless of the source of establishing minimum standards, the awarding body determines whether the company receives the seal, label, or award – and in many cases (as can be seen, for example, in the Austrian or the British context), there are numerous tiers of award. Such recognition is important but also comes with limitations concerning 1) the extent of verification processes, which should not only recognize those who are performing well but also provide information and data to improve regulation, update minimum standards, and effectively target achievable reductions in carbon emissions; and 2) the problematic fact that certificates and awards can be granted despite a very low tier of green achievement. Such disconnections raise questions regarding how reports are analyzed, the effectiveness of the minimum standards in setting limits, and whether they provide meaningful results or inform policymakers. Accordingly, a substantive sustainability strategy will require a more robust and transparent process that recognizes efforts based on solid evidence of green production practices and thorough verification of their impacts.

## CASE STUDIES

The following section outlines five case studies that summarise some of the current best European green auditing practices. The first section focuses on best practice examples of incentivizing voluntary reporting and auditing in Portugal, Austria and Italy. The second surveys practices in France and Germany to indicate a model for mandatory reporting and auditing for the European FTS industry.



## PORTUGAL

Portugal recently introduced financial incentives for productions that implement sustainable practices. The Pic Portugal – Cash Refund Incentive scheme[38] (launched for 2024) prioritises the appointment of a dedicated sustainability lead and third-party verification. Aimed at larger productions (minimum 2.5 million euro spent in Portugal), the Cash Refund scheme offers a point for having a sustainability plan conducted by a green shooting consultant and two points if this includes an environmental audit. The Pic Portugal – Cash Rebate Incentive scheme, on the other hand, offers a point gained for having a sustainability plan led by a consultant and offered for smaller fiction and animation productions. While the Cash Rebate and Refund are important incentives, Portugal does not have any specific mandatory sustainability requirements for production or auditing.

---

[38] Pic Portugal (2024) Cash Refund Incentive, available at: <https://pic.portugalfilmcommission.com/en/cash-refund/>

While the domestic tool Green Shooting Portugal is used by local productions, Trentino's Green Film, albert, PEACH, and PEAR are some of the other calculators and guidelines deployed in the Portuguese FTS industry. However, the Portuguese scheme does not specify which tool must be used, leaving the auditing process dependent on the chosen tool or the consultant hired. It also does not specify which companies or individuals qualify as authorised third-party auditors. This creates an open door for production companies to choose any consultant or auditor, where the proliferation of consultancies and companies offering sustainability advice with no mandatory verification processes may raise concerns about the effectiveness of these efforts in achieving real environmental impact.

Without clear regulations and mandatory verification processes, the effectiveness of Portugal's incentive scheme in driving real environmental improvements remains uncertain, and could potentially lead to a scenario where consultants, paid by productions, are motivated to overlook shortcomings to secure future contracts.

## AUSTRIA

The Austrian Film Commission offers one of the most comprehensive green production incentivization models called the Catalogue of Criteria for Ecological Minimum Standards ÖFI which encompasses their own national guidelines, calculator, and mandatory third-party auditing process for productions seeking

the Austrian EcoLabel. Productions must declare their sustainability goals upfront, with auditors verifying their achievements during and after production. Additionally, the Film Commission introduced the Green Bonus incentive ÖFI+ in 2023, reimbursing up to 5% of production costs for projects meeting these sustainability criteria[39]. While a positive step, the voluntary nature of the incentive raises questions about its effectiveness in driving significant emissions reductions.

In Austria, according to the Ecolabel guidelines, film production compliance is verified by an independent auditing body through a two-step control system based on production stages. First, the production company's compliance is assessed through an initial application including a mission statement, green production agent nomination and information sent to staff members about policies. Follow-up audits take place in the development and pre-production phase of a project, presenting an action plan explaining the sustainability commitments of the production company to comply with the environmental criteria. Second, when the project enters the production phase, the green production agent will submit all evidence to demonstrate compliance with environmental criteria; each production is independently assessed, with applications for the EcoLabel filed at the start of the two-level audit procedure and at the beginning of shooting. For series, compliance is verified once, assuming measures remain consistent throughout. Any relevant changes during production must be promptly reported to the independent auditing body for verification.

---

[39] Austrian Film Institute / Österreichisches Film Institut (2023) Green Filming / Funding, available at: <https://filminstitut.at/en/aid/green-filming>

Upon completion of the second step of the certification process, the film production can utilise the Ecolabel logo in external communications with the following statement: 'This film production complies with the criteria of the Austrian Ecolabel for Green Producing'.

The Austrian auditing process is mandatory if a production seeks to obtain the ÖFI Ecolabel, which indicates that compliance with certain minimum environmental standards is a prerequisite for domestic funding. The voluntary Green-Bonus ÖFI+ (providing a 5% tax incentive) applies to both domestic and international productions and is especially used as a competitive mechanism to attract more incoming production. The use of mandatory and voluntary mechanisms thus makes Austria a progressive frontrunner in the European sustainability FTS landscape.

## ITALY

Italy is a good example of a nation that has multiple and competing systems in place, the most prominent being Green Film and Ecomuvi. The Green Film protocol follows a verification procedure that involves both document and on-set verification. Before starting the shoot, the production must provide originals or copies of various documents, including the Sustainability Plan, nomination and curriculum vitae of the Green Film Manager, e-mails sent to crew, and minutes of the kick-off meeting. For optimising environmentally responsible transportation,

the production must provide originals or copies of documents such as the nomination of the appointed Mobility Manager, the Transport Optimization Plan, and logging data on fuel consumption, distance travelled, and the number of people travelling in each vehicle. The on-set verification records the vehicles that are actually used.

While offering considerable advances in environmental monitoring, this initiative still poses a few concerns that are not uncommon to this early phase of sustainability policy development. Firstly, the point system follows a self-selective principle on the actions conducted, as opposed to requiring productions to take particular actions or practices. Here, Green Film certification can be achieved through good practice on, for example, communication, paper reduction and food management, but with no requirements to act on waste management, accommodation and logistics. Secondly, the Green Film protocol indicators are written as a checklist of yes/no answers that does not produce qualitative data. Finally, the certificate is housed within the commission that administers and awards it (Trentino Sviluppo S.p.A, the owner of the Green Film certification mark).[40] While on-set verification is conducted by an external verifying body, including Bureau Veritas (certifying organisation offering environmental standards for organisations), and RINA (Italian organisation that certifies companies that comply with environmental standards, they report back to Green Film who authorises the final certification.

---

[40] Green Film (2024) Certification, available at: <https://www.green.film/certification/>

EcoMuvi, another key organisation focusing on sustainable development of production in Italy since 2013, also has a two-step verification process for awarding its label to productions. The inspection process for EcoMuvi certification involves two separate phases: on-set inspections during the audiovisual production (phase 1), and an inspection with reporting and accounting of data and information related to the audiovisual product after production closure (phase 2). The inspection dates and team composition are agreed upon between Accredia Accredited Conformity certifying bodies such as ITALCERT[41], the project's EcoMuvi manager, and the client. During the inspection, the Inspection Group evaluates compliance with the EcoMuvi Protocol criteria through documentation examination, staff interviews, and assessment of ongoing activities.

In September 2023, EcoMuvi was officially recognized by Accredia, the Italian Accreditation Body, as an accredited industry standard. It is therefore the only standard in the EU that has been evaluated by their domestic accreditation body's technical and scientific table of experts for environmental regulation and sustainable development and has been accredited as a standard.[1] Due to Europe's multilateral agreements, this accreditation is valid throughout the whole of Europe, guaranteeing authenticity to the results. While the Ecomuvi process remains voluntary, it is an accredited sustainable development management system (not only a checklist or calculator), which allows for integration with many other tools if need be. Such adaptability demonstrates that methodologies and calculators do not have to be seen as competitors, as they currently are, but could be seen as integrable as long as there are stronger overarching incentives to do so.



---

[41] ITALCERT Srl (2024) ITALCERT Srl Conformity Assessment Body, available at: <https://www.italcert.it/>

[42] Accredia (2024) Lista Degli Schemi di Accreditamento, available at: <https://www.accredia.it/app/uploads/2023/09/LS-15rev.23.pdf>

## FRANCE

Whereas Portugal, Austria and Italy are encouraging wide-ranging sustainable practices through voluntary incentivization, France and Germany provide examples of a mandatory approach. Here, the ‘eco-conditionality’ (ie. production funding is ‘conditional’ on the basis of green requirements) process adopted by Film France, requires the submission of a provisional and final report on carbon emissions generated during production to obtain production subsidies, using either Secoya Eco-Tournage’s SeCO2[43] or Ecoprod’s Carbon Clap. EcoProd, arguably France’s primary system for green production certification, is a non-profit association funded by Audiens[44], the CST, Film Paris Region and the broadcasters Canal +, France TV and TF1, and is used across the country. EcoProd establishes minimum sustainability standards (80 actions), with productions needing to comply with at least 65% of these standards to qualify for the EcoProd label recognizing green production efforts. The process involves a third-party audit conducted by AFNOR (third party certification body). This focus on transparency and the explicit integration of funding with green requirements is a positive step, but the lack of incentives to provide a reduction plan leads to a knowledge gap and weakens the overall effectiveness of France’s approach to green production.

[45]



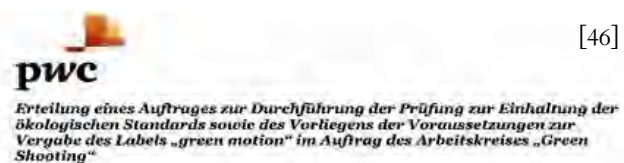
[45] Green Motion (2024) Ökologische Standards und Label Green Motion / Ecological Standards and Label Green Motion, available at: <https://www.green-motion.org/>

[46] PricewaterhouseCoopers GmbH (2017) Auditing the Compliance with Ecological Standards and Requirements for awarding the ‘Green Motion’ Label on behalf of the ‘Green Shooting’ Working Group,

## GERMANY

As with the French example, with their emphasis on increasing degrees of compliance and auditing, Germany is a noteworthy inclusion as they treat their respective green label minimum standards as mandatory. As of July 2023, Germany (including the State Minister for Culture and Media, all film funding agencies of the federal states, and the Federal Film Board FFA) have joined the initiative to implement nationwide ecological standards for all publicly funded productions. Specifically, producers should not just comply with Germany’s standardised ecological guidelines, but after production is completed, the production company must submit a final report based on the official template established by the FFA. Alternatively, two reports can be submitted if more than 25 % of the overall production costs are incurred abroad. Both reports require an account of every mandatory requirement fulfilled alongside the production’s CO2 emissions, which are then calculated after the production is complete. Upon submitting these mandatory reports, they subsequently undergo an auditing process facilitated by multinational professional services network PricewaterhouseCoopers (PwC). Here, the awarding of the Green Motion Label is exclusively handled by PwC, with the verification process being mandatory before the label is awarded.

[46]



# CONCLUSION

The approaches included here move in degrees of auditing requisite from Portugal, Austria and Italy's voluntary requirements to France and Germany's mandatory ones. Understanding the role of international FTS organisations in fostering a sustainable transition will require a more nuanced discussion about the scope and value of seeking certification or awards, including potential financial support for low budget or independent productions. From this perspective, robust auditing processes, conducted by an authorised independent third-party organisation, may be the next crucial step. These audits can ensure transparency in ways that make a more tangible contribution to the industry than the 'market' for sustainable certification, which often operates when a production claims to have adopted specific practices that reduce environmental impacts but does so with only minimal reporting of carbon emissions.

In summary, while there is growing recognition of the need for green production practices, the current system lacks transparency and accountability. A shift towards standardised processes, public reporting with common benchmarks, robust auditing, and financial support for such verification mechanisms is essential for achieving meaningful environmental impact in the audiovisual industry. The lack of comprehensive data currently hinders efforts to develop effective transnational policy and financial incentives to address the industry's biggest environmental impacts, such as fossil fuel consumption for

energy and transport. While the Green Screen-commissioned Fuel Project (led by Film London, 2024) is headlining research on the carbon footprint of – and potential alternatives to – fuel, further transparency would allow stakeholders to benchmark current practices and identify areas for improvement and is crucial for accelerating the industry's transition towards sustainability.

The recommendations provided here set out to address the current auditing norms' lack of transparency, inconsistent standards, and the potential for greenwashing. By implementing these changes, the EU can create a more robust and effective framework for green production in the audiovisual sector.

# RECOMMENDATIONS

1. National governments should make third-party audits mandatory for all publicly-financed productions, and in the case of low-budget production, provide financial support for the auditing process;
2. Local and transnational governance, including organisations like Creative Europe, should enact regulatory norms and protections to ensure the independence and quality of third-party auditors through the establishment of accreditation standards;
3. Industry organisations should collaborate with auditors on verifying the implementation and effectiveness of green practices rather than solely relying on self-reported data.

# 6 CONCLUSION

The initial introduction of sustainable practices in the early 2010s offered the FTS sector the opportunity to position itself as a leader in green economy growth. Yet, the push towards sustainable film production in Europe has been fuelled by a complex mixture of market dynamics, stringent regulatory frameworks, evolving corporate ethics, and shifting consumer preferences.

The trend toward environmentally responsible business practices is increasingly pushing the film industry to adopt sustainable methods, but this has the potential to quickly become subsumed into the ‘business-as-usual’. If pay-for-certification labels and lack of authoritative, independent third-party verification end up as a new norm, innovative environmental strategies may not end up contributing to the industry’s environmental impacts, but to a competition to offer less while signalling more.



Accordingly, the clearest and simplest takeaway from years of this collaborative research with those operating in offices and on-set is that sustainable production practice needs stronger and more comprehensive support, from both public and private sectors. The mandate of environmental responsibility must be supported through financial incentivisation and operationalized through skills training and auditing. Expectations and practices must be standardised and production footprints must achieve absolute mitigation without resorting to carbon offsets or other means of accountability displacement.

From a policy level, this means a radical transformation of multilateral and national mechanisms for provisioning and holding accountable sustainable production protocol as current green practices do not necessarily translate into a significant reduction in emissions. The emphasis on carbon calculation, especially, may have become more like a bureaucratic exercise than a driver for actual reduction. While providing useful information around key emissions hot spots, it currently provides a simplified metric that replaces the complex environmental costs and consequences of FTS production. While key emissions drivers like energy and transportation are well understood, current recognition systems lack any fully mandatory requirement for demonstrably reducing these emissions by a specific percentage. The disconnect between standardisation, financing, auditing, and

meaningful actions highlights the crucial need to revise certification and award processes to achieve meaningful environmental impact, especially as public policy and funding is often lagging behind the sustainability efforts of competitive studios and other international private stakeholders frequently dominating the European screen landscape.

The aim of this report has been to connect policy and the efforts of agencies, commissioners, broadcasters, streamers, sustainability consultants, creatives, practitioners, suppliers, studios, and environmental activists to reverse this course so that green film planning and production becomes an active agent for positive change as opposed to a canary in the coalmine for corporate sustainability efforts. Accordingly, our key recommendations are:

1. That government offices and industry stakeholders collaborate to standardise green production criteria across the EU, including not only production practices but interlinked policy mechanisms such as financial incentives, mandatory requirements, and auditing reportage;
2. That sustainability measures move beyond an overt reliance on metrics such as carbon calculation and, instead, link financial incentives directly to verifiable environmental impact reductions; and
3. That EU and national regulatory bodies mandate independent third-party auditing for any form of green certification and tie this explicitly to financing requirements.

# BIBLIOGRAPHY

Albert (2024) BAFTA Albert, available at: <https://wearealbert.org/>

Association of Audiovisual Producers (2021) Green Filming, available at: <https://greenfilming.cz/s-kym>

Audiens (2024) Audiens Accueil, available at: <https://www.audiens.org/accueil.html>

Austrian Ecolabel / Österreichisches Umweltzeichen (2017) Ecolabel Guideline EL 76 Green Producing in Film Productions and on TV, available at: [https://www.umweltzeichen.at/file/Guideline/UZ%2076/Long/Uz76\\_R1a\\_Green%20Producing\\_2017\\_EN.pdf](https://www.umweltzeichen.at/file/Guideline/UZ%2076/Long/Uz76_R1a_Green%20Producing_2017_EN.pdf)

Austrian Film Institute / Österreichisches Film Institut (2023) Green Filming / Funding, available at: <https://filminstitut.at/en/aid/green-filming>

Austrian Film Institute / Österreichisches Film Institut (2023) Catalogue of Criteria of Minimum Ecological Standards for Austrian Cinema Film Productions ÖFI / ÖFI+, available at: [https://filminstitut.at/wp-content/uploads/2023/08/Catalogue-ecological-standards-Austrian-cinema-film-productions-OeFI\\_OeFI\\_Version-1.0\\_01.01.2023\\_engl.pdf](https://filminstitut.at/wp-content/uploads/2023/08/Catalogue-ecological-standards-Austrian-cinema-film-productions-OeFI_OeFI_Version-1.0_01.01.2023_engl.pdf)

Castendyk, Oliver (2018) Tax Incentive Schemes for Film Production: A Pivotal Tool of Film Policy? in Handbook of State Aid for Film, available at: [https://link.springer.com/chapter/10.1007/978-3-319-71716-6\\_32](https://link.springer.com/chapter/10.1007/978-3-319-71716-6_32)

Cineuropa (2015) Impact of Fiscal Incentive Schemes on the Production of Film and Audiovisual Works, available at: <https://cineuropa.org/en/newsdetail/286877/>

CineRegio (2012) Green Regio, available at: [https://www.cineregio.org/subgroups/green\\_regio/](https://www.cineregio.org/subgroups/green_regio/)

Cine Tirol Film Commission (2024) Green Filming Tirol, available at: <https://www.cine.tirol/en/green-filming/>

CNC, Film France (2023) Green Filming: Plan Action! & Eco-conditionality of CNC Subsidies, available at: <https://www.filmfrance.net/en/guidance/green-filming/>

Council of Europe (2024) Eurimages: Sustainability Strategy, available at: <https://www.coe.int/en/web/eurimages/sustainability-strategy>

Ecomuvi (2024) EcoMuvi Certification, available at: <https://www.ecomuvi.eu/>

Ecoprod (2024) Carbon'Clap, available at: <https://www.ecoprod.com/en/carbon-clap.html>

Entertainment Partners (2024) Europe Production Incentives, available at: <https://www.ep.com/production-incentives/europe/>

Eureca (2024) European Environmental Calculator, available at: <https://www.eurecafilm.eu/>

Eurimages, Council of Europe / Conseil de l'Europe (2023) Sustainability Strategy, available at: <https://www.coe.int/en/web/eurimages/sustainability-strategy>.

European Audiovisual Observatory (n/a) Public Funding, available at: <https://www.obs.coe.int/en/web/observatoire/industry/public-funding>

European Commission, The (2020) European Media and Audiovisual Action Plan, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52020DC0784&from=EN>

European Commission, The (2024) Creative Europe MEDIA Strand, available at: <https://culture.ec.europa.eu/creative-europe/creative-europe-media-strand>

European Union, The (2024) Policy Support Cluster, available at: <https://culture.ec.europa.eu/creative-europe/creative-europe-media-strand/policy-support-cluster>

European Union, The (2023) How Creative Europe aims to go Green, available at: [https://www.google.com/url?q=https://culture.ec.europa.eu/news/how-creative-europe-aims-to-go-green&sa=D&source=docs&ust=1716716901209166&usq=AOvVaw2aOpMDKR6\\_F4etvKG1gNr8](https://www.google.com/url?q=https://culture.ec.europa.eu/news/how-creative-europe-aims-to-go-green&sa=D&source=docs&ust=1716716901209166&usq=AOvVaw2aOpMDKR6_F4etvKG1gNr8)

Film Commission Südtirol, IDM (2024) Green Shooting, available at: <https://www.film.idm-suedtirol.com/en/film-commission/green-shooting>

Film London (2023) Film London launches The Grid Project, supplying Renewable Energy to Productions in the Capital, available at: <https://filmlondon.org.uk/latest/grid-project-launch>

Flying Secoya, SeCO2 (2024) Measure the Carbon Footprint of your Production and concretely reduce the CO2 emissions of your project, available at: <https://www.flyingsecoya.com/seco2>

Forvis Mazar (2011) Comparative Study of Tax Incentive Systems and the Location of Television and Film Production, available at: <https://www.mazars.com/Home/About-us/News-publications-and-media/Our-publications/Surveys-and-studies/Study-of-tax-systems-and-tv-and-film-production>

German Federal Film Board (2024) Ecological Standards for German Cinema, TV, and Online / VOD Productions, available at: <https://www.ffa.de/files/ffa/ffg-regelungen/verordnungen-abkommen-vereinbarungen/Ecological%20Standards%20for%20German%20Cinema%2C%20TV%2C%20Online%20and%20VoD%20Productions.pdf>

Green Film (2024) Green Film Rating System and Certification for a Sustainable Film Production, available at: <https://www.green.film/>

Green Motion (2024) Ökologische Standards und Label Green Motion / Ecological Standards and Label Green Motion, available at: <https://www.green-motion.org/>

Green Production Guide (2024) Green Production Guide Toolkit, available at: <https://greenproductionguide.com/tools/>

Green Screen (2024) Greening the creative industries: improving policy practices for the European audiovisual industry, available at: <https://projects2014-2020.interregeurope.eu/greenscreen/>

ITALCERT Srl (2024) ITALCERT Srl Conformity Assessment Body, available at: <https://www.italcert.it/>

KPMG LLP (2019) Film Financing and Television Programming: A Taxation Guide, available at: [https://assets.kpmg.com/content/dam/kpmg/pdf/2016/06/382456\\_united-states-layoutv3.pdf](https://assets.kpmg.com/content/dam/kpmg/pdf/2016/06/382456_united-states-layoutv3.pdf)

Lower Austrian Film Commission (2023) EVERGREEN PRISMA – Sustainable Filmmaking, a Pioneering Contribution to Greater Ecological, Economic and Social Responsibility, available at: [https://www.lafc.at/downloads/LAFC\\_Evergreen\\_Highlights\\_2023\\_05\\_EN\\_Final\\_V4.pdf](https://www.lafc.at/downloads/LAFC_Evergreen_Highlights_2023_05_EN_Final_V4.pdf)

Media Services (2024) Production Incentives for Film & TV - Interactive Map, available at: <https://www.mediaservices.com/production-incentives/production-incentives-interactive-map/>

Ministry of Culture (2023) The DGCA intervenes at the Presentation of Green Film Research Lab - “Special Project” supported in 2020, available at: <https://cinema.cultura.gov.it/notizie/con-disciplinare-green-film-giu-le-emissioni-e-meno-costi-per-le-produzioni/>

MOIN Film Fund (2024) Green Filming, available at: <https://moin-filmfoerderung.de/en/green-filming>

National Conference of State Legislatures (2022) Film Tax Incentives Back in the Spotlight, available at: <https://www.ncsl.org/fiscal/film-tax-incentives-back-in-the-spotlight>

NEMA (2024) Nordic Eco Media Alliance, available at: <https://www.nema.network/>

New Zealand Film Commission (2023) Accessing the 5% Uplift, available at: <https://www.nzfilm.co.nz/incentives-co-productions/nzspr-international-productions/accessing-5-uplift>

Pic Portugal (2024) Cash Refund Incentive, available at: <https://pic.portugalfilmcommission.com/en/cash-refund/>

Portugal Film Commission (2023) Session on the Sustainability Criteria in Pic Portugal Incentives, available at: <https://portugalfilmcommission.com/en/news/session-on-the-sustainability-criteria-in-pic-portugal-incentives/>

Portugal Film Commission (2021) Green Shooting Portugal: Guide to Sustainable Filming, available at: [https://portugalfilmcommission.com/wp-content/uploads/2021/05/PFC\\_Green-Shooting\\_EN.pdf](https://portugalfilmcommission.com/wp-content/uploads/2021/05/PFC_Green-Shooting_EN.pdf)

PremiumBeat (2018) Understanding Tax Incentives in the Filmmaking Industry, available at: <https://www.premiumbeat.com/blog/understanding-tax-incentives-film-industry/>

PricewaterhouseCoopers GmbH (2017) Auditing the Compliance with Ecological Standards and Requirements for awarding the 'Green Motion' Label on behalf of the 'Green Shooting' Working Group, available at: [https://www.green-motion.org/files/16\\_green\\_motion/Dokumente/230821-Auftragserteilung-PwC.pdf](https://www.green-motion.org/files/16_green_motion/Dokumente/230821-Auftragserteilung-PwC.pdf)

Producers Guild of America (2014) PGA Green Unified Best Practices Guide, available at: <https://greenproductionguide.com/wp-content/uploads/2014/04/PGA-Green-Unified-Best-Practices-Guide-REV.pdf>

Research Council of Norway, The (2024) Green Producers Club, available at: <https://www.greenproducers.club/>

Screen Brussels (2023) Eco-filming, available at: <https://screen.brussels/en/eco-filming>

Screen Ireland / Fís Éireann (2023) Sustainability Innovation Fund - Pilot, available at: <https://www.screenireland.ie/funding/production-loans/sustainability-innovation-fund-pilot>

Slovak Film Commission (2020) Guidelines for Sustainable Filming, available at: <https://www.filmcommission.sk/606-en/guidelines-for-sustainable-filming/>

Trentino Film Commission (2023) The Green Film Protocol, available at: <https://www.green.film/>

Sustainable Production Alliance (2024) Close Up: Scope 3 Emissions in Film and Television Production, available at: [https://greenproductionguide.com/wp-content/uploads/2024/03/Sustainable-Production-Alliance\\_Scope-3-Whitepaper.pdf](https://greenproductionguide.com/wp-content/uploads/2024/03/Sustainable-Production-Alliance_Scope-3-Whitepaper.pdf)

Retzlaff, Katherine (2023) Germany's Ecological Production Standards, Filmförderungsanstalt, available at: <file:///C:/Users/pieta/Downloads/Europe-Germany-Green-Strategy-Nordic-Green-Meeting.pdf>

VAF (2024) Flanders Audiovisual Fund, available at: <https://www.vaf.be/en>

Wrapbook (2024) Film Industry Tax Incentives: State-by-State, available at: <https://www.wrapbook.com/blog/film-industry-tax-incentives>