



A Comparative Legal Analysis to Inform the Creation of Economic Protections for K-Choreography

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Abstract

In the last decade, cultural exports have become a significant contributor to South Korean soft power and the economy. However, South Korea choreography, which has become a distinctive and internationally recognized characteristic of the multi-billion-dollar K-Pop industry and traditional forms of dance, lacks copyright protection. Various stakeholders are currently attempting to create legal protections for South Korean choreography. This paper offers a comparative legal analysis of copyright protections for choreography that exist in North America, Europe, Asia, and its current status under the international copyright treaty The Berne Convention. An overview of these protections is compared to the existing legal framework of South Korea. Recommendations are proposed for the development and implementation of copyright protection for South Korean choreography based on the comparative legal analysis.

Keywords: Choreography; K-Pop; soft power; intellectual property; cultural exports.

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1. Introduction

1.1. Background and Context

Putting a monetary value on the creative product “choreography” is a challenging process. First, choreography itself needs to be defined. Once it is defined, how can its contribution to various performances or entire industries be quantified. For example, to what extent has Psy’s international phenomenon “Gangnam Style” dance from 2012 onwards contributed to the increasing popularity of Korean music, drama, and culture in general? How many people first learned about South Korea and later decided to visit the country after their first exposure to the catchy tune combined with the distinctive dance moves? Research suggests that after the song and dance spread worldwide, stocks related to South Korea’s Recreation and Culture and Digital Content sectors showed abnormal returns related to “Gangnam Style’s” popularity, but more surprisingly, so did stocks related to the IT industry Reference [1]. Although difficult to quantify, the value of the choreography is widely recognized. In 2015, a large sculpture of hands in the shape of the “horse riding” choreography of the dance moves in the song was unveiled in central Seoul and has become a significant tourist attraction [2]. However, what is certain is that the K-Pop industry in which original choreography plays an important role was estimated to be valued at \$8.1 billion in 2021 and is expected to grow to be worth \$20 billion by 2031, a compound annual growth rate of 7.3% which makes it one of the fastest growing industries in South Korea [3].

1.2. Research Problems and Gaps

Despite the value that original and creative choreography contributes to the high and increasing value of cultural industries and the indirect value created by playing a role in the development of the image of South Korea internationally, no clear legal recognition of choreography as a form that can be copyrighted exists in South Korea. Internationally, legal recognitions of choreography as a copyrightable activity are also inconsistent. This has meant that the value created by choreographers has been lost in the overall value of the music and performance industries. For choreographers, this leads to a lack of recognition for the value created and a weakening incentivization for people to join and contribute to the industry, to ensure that South Korea continues to profit from this form of creativity. With the potential for rapid dissemination and monetization of original creativity in choreography online, it is vitally important South Korea develops a rigorous system of protections to maximize the value of this important form of Korean creativity.

1.3. Research Questions

The questions this research aims to answer are as follows: what are the strengths and weaknesses of existing systems of copyright for choreography in North America, Europe, and Asia? How do international treaties affect or inform the development of these systems? What are the gaps in South Korea’s legal framework for copyright protection of choreography? How can the lessons learned from the comparative analysis be applied to South Korea?

1.4. Objectives

The main objective of this paper is to identify best practices that can inform the development of a system of copyright protection for choreography in South Korea. By comparatively analyzing existing legal frameworks,

precedents, treaties, and commentary, gaps in South Korea's legal framework can be better understood and reforms can be proposed.

1.5. Significance

As the debate on how to create copyright protections in South Korea unfolds, this paper will be a significant contribution to understanding the various systems of protection that already exist in different contexts and how lessons can be learned from the strengths and weaknesses of those systems. This research will build upon existing efforts to develop an effective system in South Korea that will ensure the value of creativity in choreography is protected and monetized, which will encourage and promote further creativity among individuals and foster a creative industry that can increasingly contribute to the overall economy of South Korea.

1.6. Structure

Following this introduction, the methodology of the analysis will be described. The most relevant and useful lessons from the development of systems of choreography copyright in North America, Europe, and Asia respectively will then be presented. A short assessment of the importance and relevance of international treaties will follow. In the second half of the paper, an analysis of the current system of copyright for choreography in South Korea is undertaken, with insights from secondary sources on the current development of new policies and frameworks. In this section, the gaps in South Korean policies will be identified. Finally, lessons from the comparative analysis will be applied to the South Korean context, with potential solutions to gaps in the legal framework suggested and how these solutions will contribute to the overall development of an effective and comprehensive system of copyright protection for choreography in South Korea. A short conclusion then summarizes the key findings and directions for future research.

2. Methodology

A comparative legal analysis of the development of copyright protections for choreography in selected North American, European, and Asian jurisdictions was undertaken. This qualitative approach aimed to assess the most relevant international and national legal frameworks, case law, and policy developments that would inform the effective development of copyright protection for choreography in the South Korean context.

The analysis relies on the assessment of primary legal sources, such as international treaties, national laws, and precedents. However, relevant secondary sources, such as academic commentary and industry reports are included to inform the current state of copyright for choreography in South Korea and the potential for future developments in the context of other national legal frameworks.

Three key areas for the effective creation and application of copyright law are considered in the analysis: definition, registration, and enforcement. The section on definition explores how various jurisdictions define choreography that can be copyrighted, including how originality is assessed. Under registration, the various approaches to how a piece of choreography can be recorded and registered are explored, with specific attention paid to the ease of registering copyright protection and how conflicting claims to be the original creator of a piece of choreography

can be resolved. Third, the challenges related to copyright enforcement are discussed and the solutions that have been created in non-Korean legal contexts are evaluated for their applicability to the South Korean context.

For this research, the distinction between moral rights and economic rights is upheld. This paper focuses only on economic rights and the registration and protection of those rights. The concept of moral rights covers non-economic rights, such as attribution of the work to its original creator, and integrity, which covers the right of the original creator to control how the work is modified or destroyed [4]. These noneconomic rights exist in various jurisdictions and have become part of the norms of online interaction. People will often credit the original creators of content online, and online communities often self-regulate by publicly identifying cases where moral rights are not acknowledged, often describing it as a form of theft [5]. This paper focuses only on economic rights and does not discuss non-economic rights, such as those understood as moral rights in certain jurisdictions.

Despite the significant theoretical and practical lessons that can be learned from various national legal frameworks and international treaties, there are also limitations to this approach. The legal systems of various nations have developed in unique historical and cultural contexts, so it is not always possible to compare one to another or apply one framework effectively to a different context without oversimplification. To avoid this, the analysis conducted in this paper uses the success and failures of existing systems of copyright as guidelines rather than something that can be directly and fully translated into the South Korean context. Given the recent development of copyright protections for choreography, the precedent for enforcement is still in its early stages of development and significant gaps remain. However, highlighting these gaps when they are found will also inform the effective development of a system of copyright for choreography in South Korea. Finally, this paper does not aim to comprehensively collect and evaluate the perspectives of stakeholders in South Korea. The scope is limited to what has been developed in other jurisdictions, which can inform the future development of a system of copyright in the South Korean context. However, further research would be required to shape these lessons to fit the demands of South Korean stakeholders.

3. Comparative Analysis

3.1. North America: US

The United States protects the copyright of choreography under the 1976 Copyright Act. *Feist Publications, Inc. v. Rural Telephone Service Co.* (1991) found that to qualify for copyright protection the work “must be an original expression fixed in a tangible medium of expression, such as recorded video or documented in written form” [6]. Although any original work is, in theory, automatically protected, the only way of claiming protection is to register the work with the U.S. Copyright Office, which will facilitate “the ability to sue for infringement, claim statutory damages, and recover attorney’s fees” [7]. In the U.S., there is also significant clarity around what cannot be considered copyrightable: common gestures, social dances, exercise routines, and athletic movements normally cannot be protected [8]. The Copyright Office offers the following guidance on what can be protected:

...rhythmic movements of one or more dancers’ bodies in a defined sequence and a defined spatial environment, such as a stage; a series of dance movements or patterns organized into an integrated, coherent, and expressive compositional whole; a story theme, or abstract composition conveyed through movement [8].

A significant recent case involved the creator of a viral dance trend on TikTok suing Epic Games, the developer of the popular “Fortnite” game. Epic Games had used the choreography of the dance seen on TikTok without credit or payment. The case was expected to go to court, but Epic Games settled with the creator of the dance, Kyle Hanagami, who has established a reputation as a choreographer after working with international music stars. Despite the final settlement and his high profile as a well-known choreographer, Hanagami had initially struggled to have his case heard. In 2022, a California District Court dismissed his claim as “the dance moves were merely basic poses and a short sequence that didn’t meet the creative threshold for copyright protection” [9]. The Court of Appeals overturned the initial decision and offered an important clarification on why choreography is protectable under copyright law:

...like other forms of copyrightable material such as music, choreography is composed of various elements that are unprotectable when viewed in isolation. What is protectable is the choreographer’s selection and arrangement of the work’s otherwise unprotectable elements. The panel held that ‘poses’ are not the only relevant element, and a choreographic work also may include body position, body shape, body actions, transitions, use of space, timing, pauses, energy, canon, motif, contrast, and repetition [10].

Although the protection of choreography initially gained some prominence with the MTV era of music videos on television, the issue has become much more significant and contested since the rapid spread of short-form video social media such as TikTok. Aside from the use of short-form videos, often related to music, very few conflicts over the copyright of movements exist in U.S. case law. An important clarification was given in *Bikrim’s Yoga v. Evolution Yoga* (2015), which found that any movement with a functional purpose and not purely intended for aesthetics cannot be protected by the 1976 Copyright Act [11]. The significance of the Hanagami decision for TikTok or other short-form video dances has not yet been clarified in case law in the U.S., but the following distinction between dance and choreography creates a framework for what can be excluded from protection: choreography is “the composition and arrangement of a series of dance movements and patterns organized into a coherent whole” and dance is “static and kinetic succession of bodily movement in certain rhythmic and spatial relationships” [10]. It is possible that the form of movement seen commonly in TikTok dances will be considered “dance” under this definition and therefore not protectable in the U.S.

In 2021, controversy arose over popular singer Addison Rae’s use of eight popular TikTok dances on *The Tonight Show with Jimmy Fallon*. The creators of the dances were often young black women with no economic protection for their creation of the dances [12]. A dance that became known as *Renegade* was also first popularized on TikTok by a 14-year-old black girl, but Charli D’Amelio used the dance without credit to increase her own follower count [12]. In both cases, young creators with little or no knowledge of how the system of copyright works and how their creativity could be monetized created dances that went viral but only belatedly received limited recognition and no financial compensation. The Hanagami case involved a piece of choreography first popularized on YouTube, which is no longer format, and the content was created by a professional.

3.2. North America: Canada

The Copyright Act 1921 first offered protection for choreography as part of a definition of “dramatic work,” but

a definition of choreography that removed the dramatic element was introduced with the Copyright Amendment Act 1988 [13]. When planning the removal of the drama-related requirement for choreographic protection, the Canadian Association of Professional Dance Organizations defined choreography as “an arrangement or an organized thought in time and space which uses human bodies as design units” [14].

For the Copyright Act to apply, the choreography must be fixed “in a tangible form” [14]. The performance or memorization of movements is not sufficient to meet the standard for protection under the act [14]. The required fixation “may take many forms, as pictorial or narrative description, film or videotape, photographs, hologram, computer animation, and videography, or written notation” [14].

Under Canadian law, choreographers on fixed contracts or contracts with specific clauses with regard to ownership of copyright may relinquish their right to claim protection for original choreography they create if they agree to it as part of the terms of their employment [15].

As of 2025, no clarity or clear regulation on the protection of short-form dances, such as those published on TikTok, has emerged. No short-form dance from a platform like TikTok has been protected under Canadian jurisdiction and no economic rights have been asserted. As with the debate in the U.S., the main concerns are the fixation of the choreography in a tangible form, the application for registration, and the distinction between what is considered long-form, complex, creative choreography and the short-form, often non-professional but viral dances and movements online.

3.3. Europe: EU

Copyright protection for choreography within the EU is complicated by the existence of a dual system. At the supranational EU level, minimum standards are set by EU law, which member states must adhere to. If a member state’s law does not meet the standard of the supranational law, remedies can be pursued at the supranational level. However, if the member states’ national laws meet the minimum standards of the EU’s supranational laws, they are free to create distinct systems of protection. To some extent, this leads to differences in national systems that complicate processes such as registration or claims for economic compensation. However, for the purposes of this research, the most influential laws are at the EU and most member states are moving toward a unified system over time, aiming to standardize or “harmonize” processes to create efficiency and consistency. Within the EU system, France is considered to have the strongest protections for what are known as *droit d’auteur*, or author’s rights, which includes the protection of choreography. For this reason, a separate discussion of the stronger protections of France will be included. Economic protections for choreography within the EU are included in a broad sense in the Copyright Directive [16]. Article 2 offers protection to all creators of literary or artistic works that are original and fixed [16]. Article 2 also provides rights over copying of a protected work. Article 3 states that protections cover performances of a work that has been registered, including performances online. Article 4 provides distribution rights for the owner of the protected work, which means only they can decide how the work is sold or transferred [16].

The most important distinction between EU law and most other jurisdictions is that the Digital Single Market

Directive (2019) creates liability for online platforms to prevent the uploading or sharing of material that is covered by copyright protection [16]. Therefore, if a user of TikTok uses a piece of choreography that has been protected under copyright law, it is the platform's responsibility and legal duty to remove the material. Under the directive, exceptions for use include the concept of "fair use," which means that the material was used in a way that can be considered quotation, criticism, or review [17]. The concept of fair use can also be extended to parody or pastiche [18].

Two cases limit the possibility of protecting short-form dances from platforms such as TikTok under EU copyright law. The Infopaq case stated that originality can apply to very short forms of content, but they have to show originality. The shorter a piece of content becomes, the less likely it is to meet the requirement that it will show originality as it is more likely to show similarity to existing forms [19]. Secondly, the Football Dataco Case found that to qualify for protection, the thing to be protected must show evidence of creative choices, not just skill or effort [20]. To prove that creative choices were made for very short-form content is much more difficult than longer content, but it is possible.

The overarching EU law shows that economic protection of choreography normally requires registration and has to meet the standard of originality, which has been further refined by the courts in ways that put the responsibility on the creator to show that specific creative choices were made, and the choreography is truly original. Given these requirements for protection, it is much easier to show that longer forms are creative and original. This also means that a shorter dance move within a longer piece of choreography is not protected in isolation. The creativity and originality requirements apply to the coherent piece as a whole, with a focus on how choices between moves show creativity and cannot be used without permission. Within the protected choreography, individual moves or shorter sections that do not meet these requirements when they stand alone cannot be protected and can be used freely, without permission.

3.4. Europe: France

Although this research does not, in general, consider non-economic or what are known as moral rights, the moral right laws of France are worth considering from an economic perspective. Unlike most jurisdictions, France provides protections of moral rights such as the right of attribution (the right to be credited as the creator), the right of integrity (the creator must be asked permission before the protected content is changed), right of disclosure (only the creator can decide when and where the first public showing of the content is made), and right of withdrawal (the creator can withdraw their content from public view), even after the economic rights to the work have been transferred or sold [21]. This means that the original creator retains powerful control over the public perception of the work they created, which can have implications for the economic use of the work.

France also has a slightly different definition of originality, which appears as a consistent requirement across all jurisdictions analyzed. There is also some overlap with the requirement for creative choice, as it exists in EU law. The French definition of originality and creativity is based on a general understanding of a piece of work as an extension of the creator's personality. The EU has confirmed this definition is in line with European law [22]. This perspective on the rights of creators would also inform decisions on short-form examples of dance and

whether they can be protected by copyright. It would be difficult to establish that a short-form video on a platform such as TikTok effectively expresses or is an extension of the personality of the creator. It would be much easier to show how the unique coherence of longer pieces expresses the personality of a creator.

3.5. Europe: UK

Following the UK's decision to leave the EU in 2016, European Union law no longer applies as a higher level of law to the UK's. The UK's copyright protections are found under the Copyright, Designs, and Patents Act 1988. Choreography is not considered as unique or separate under UK copyright law. Any application for copyright protection must meet the general requirements that are applied to other forms of work [23]. There is limited UK case law on copyright protections for choreography or dance, but the general rules can be applied.

Under UK copyright law, an idea cannot be protected. Only choreography that is original, can be performed physically, and can be fixed can be used as the basis for copyright protection [24]. However, unlike the U.S. which has differentiated between dramatic works and choreography, UK law still defines copyrightable choreography as part of a dramatic work. There is very little guidance on what would constitute originality in the pattern of moves or planning, but "it is likely that short, simple dances would not qualify for protection" [25]. Furthermore, disputes over the use of choreography have normally been settled out of court, meaning that there is almost no precedent for defining the difference between originality and imitation in short-form dance or choreography [25].

In *Green v Broadcasting Corporation of New Zealand* (1989), a claim that dance routines used as part of a television show should be protected under copyright law was rejected. The court found that the dance routines were too simple or basic to meet the requirement for originality [26]. In *Norowzian v Arks Ltd* (1999), a claim was made that short choreographic sequences that were incorporated into a short film should be protected by UK copyright law. The court accepted the claim, but this example of how copyright can protect original choreography is in the context of a short film, through which it is much easier to claim originality. The claim also met the requirement for the "dramatic" element of the work to be protected. This is a very different format from the short-form video platforms like TikTok [27].

3.6. Europe: Russia

The Russian legal system offers copyright protection for choreography as a distinct category of creative work in the Civil Code of the Russian Federation, Article 1259, which states: "the objects of copyright are scientific, literary, and artistic works, irrespective of the merit and significance of the work or the method whereby it is expressed [including] "choreographic works" [28]. Similar to other European and North American systems of copyright protection, the Russian legal system provides protection for original work as soon as it is created, but in practical terms, the only way to apply for protection or enforcement is if the work is fixed or recorded in a tangible way and registered to facilitate identification of the original creator and the originality of the work. Despite the long history of a legal framework for copyright protections of choreography – the first protection was created in 1925 with the Soviet Copyright Act [29]– and the cultural respect for high forms of dance such as ballet, there is no English-language evidence of case law or claims for copyright protection of choreography or dance in Russia.

3.7. Asia: Japan

Unlike most of the jurisdictions analyzed so far, Japan has both a sophisticated legal framework for the protection of choreography and several cases that clarify the nature of choreography which is eligible for copyright protection. Japan's Copyright Law, Article 10, Paragraph 1 specifically states that choreography can be protected by the copyright law [30]. Like other jurisdictions, choreography is considered protected as soon as it is created if it meets the requirements for protection, but for practical purposes, any attempt to enforce copyright protection by proving originality and the identity of the creator requires registration of the work with the Japan Copyright Office [31].

The originality and creativity requirements that are often included in other jurisdictions have been well developed as concepts by claims in the courts.

In 2008, the Tokyo District Court ruled against a claim for copyright protection of a series of modifications to what are known as "social dances," or dance steps which are well known. The claimant argued that their modification of the steps and the creation of a unique series of dances that were used in a well-publicized movie were original and creative enough to meet the requirement for protection. The court denied the claim, saying that: "the dance arrangement must have outstanding features and originality beyond the level of a mere combination of the existing steps" [32]. The court reasoned that:

A social dance arrangement is creation of a sequence of dance moves by combining basic steps and other existing steps such as Popular Variation (PV) steps and making some variations to them...if the required level of originality of a dance arrangement is lowered and any combination of steps were to be found copyrightable... the degree of freedom in arranging dances would be extremely limited [32].

The Japanese system seems to specifically deny copyright protection to the mere combination of existing steps in a new style. The standard for proving originality and creativity is, therefore, set very high, but there have been cases in which claimants have been successful in their claims for copyright protection. The Osaka District Court found that even though a hula dance was only a combination of common or existing steps, in this the creator had set the steps to lyrics and music in a highly original way. The court stated that "even if each movement itself is common, if it is choreographed to the corresponding part of the lyrics and is not seen elsewhere, it is reasonable to recognize that the author's individuality is expressed as the expression of the lyrics" [33].

Given these decisions, it is expected that copyright protections for various forms of dance and choreography will meet the originality and creativity requirements for copyright protections in the future [34]. However, there is an important distinction between the rights of copyright holders and what would be considered the equivalent of the fair use concept that exists in Western legal systems. If the use of choreography is for online videos, for example imitating the moves and posting them to social media or using them for a purpose such as showing the practicing of well-known dance moves, the use might be considered private, not public, and private use is not restricted by copyright protections. To emphasize, the use may still be considered for private use even if the imitation of the choreography is posted on social media [34]. However, monetization of such online posting would likely define

the use as public, and subject to copyright restrictions, even though there is a lack of clarity around whether advertisements on such videos would be enough to consider the use public rather than private [34].

3.8. Asia: India

The Indian legal system protects choreographic works under the Copyright Act of 1957. Section 2(h) states that “dramatic work includes any piece for recitation, choreographic work...which is fixed writing or otherwise but not include cinematographic film” [35]. As with most other jurisdictions analyzed, the key point is that the choreography must meet minimum requirements of originality and cannot be individual steps or simple routine.

India also has an extra layer of protection for dancers or performers and creators of choreography in the form of performers’ rights. The rights are in the early stage of development but cover a similar breadth of rights as the moral rights of the French system. The High Court of Kerela found that these rights were violated in the case of a local government department recording and circulating video footage of the claimant, who had performed choreography of her own creation at her dance school with her students [36]. However, there is currently a significant point of confusion in the Indian system in regard to the fixation of choreography when attempting claim protection. The original Copyright Act was created more than 70 years ago, and the requirement to write the movements down was intended literally. TikTok has been banned in India since 2020, but other short-form video social media platforms have emerged, and the recording of choreography has become common. Despite this, the Supreme Court of India explicitly stated that protection for choreography was only given because the choreography had been written. The case involved the protection of a newly developed form of ballet, and the protection was given as the choreography was understood to have met the requirement of originality and had been written down, but this has left a gap in the law with uncertainty around whether a video recording of choreography without a written form will be accepted as sufficient fixation under the existing act [37].

The process for registering an application for copyright of choreography currently seems to expect choreographic notation or written descriptions of the choreography in order to process an application for protection [38].

3.9. Asia: China

Article 3 of China’s Copyright Law of the People’s Republic of China explicitly offers protection for choreographic works [39]. As with other jurisdictions, protection is automatic upon creation, but to facilitate effective enforcement and ensure recognition of originality and creativity, registration with the relevant authorities is most likely necessary for protection [40].

China has a high level of protection for moral rights, which cannot be transferred or sold, and they seem to overlap with economic rights at this level of protection, as in France [41]. There have been conflicting decisions in Chinese courts about exactly what constitutes the target of protection in the copyright of choreography. In one case, the court found that elements on stage such as lighting and music were included as part of the protected choreography. However, a higher court overruled the decision and stated that the protection should be limited to original designs such as “movements, gestures, and expressions of dance” [42].

Despite the protections for choreography offered under Chinese copyright law, few cases have led to significant enforcement that would deter what is considered plagiarism by the public. Many accusations of plagiarism happen on short-form platforms like TikTok but rarely gain much attention. However, the issue of weak copyright enforcement for choreography received significant attention when Zhejiang TV station broadcasted a dance show that contained choreography that was described as 90% similar to the choreography of another show called the Poetic Dance. The controversy led to the show on Zhejiang TV being canceled and apologies offered to the original creators. Despite the lack of formal enforcement in the courts, the incident revealed the increasing understanding of copyright among the general public in China and the demands that such rights are respected [43]. With the increase in awareness, it is likely that more cases of copyright protection for choreography will arise in the courts and the protections will be further refined. However, the challenges that other jurisdictions face, such as determining originality and creativity, pose significant challenges in China as well.

4. International Treaties

4.1. Berne Convention for the Protection of Literary and Artistic Works 1886

The most significant international treaty relating to the protection of choreography is the Berne Convention for the Protection of Literary and Artistic Works (1886). South Korea is a signatory to the Berne Convention, and all signatories agree to a minimum standard of copyright protection for creative works, including choreography [44]. The convention was the original source of many of the similar rights that have been described when analyzing each jurisdiction. Signatories to the convention agree that choreography is automatically protected but needs to be fixed, in a form such as writing or video, to be eligible for protection. The convention also sets the minimum duration of protection for original works at 50 years, which many of the jurisdictions that have been assessed have extended to 70 years [44].

Despite the effectiveness of setting minimum standards for copyright internationally, the Berne Convention offers no definition of choreography and fails to inform the debate about what constitutes originality. Researchers suggest that the convention needs significant updating to remain relevant to the digital age and to better develop harmonization of the national legal systems [45].

4.2. World Intellectual Property Organization (WIPO) Treaty 1996, WIPO Performances and Phonograms (WPPT) Treaty 1996

The WIPO Treaty and the Performances and Phonograms Treaty both attempted to update the Berne Convention for the digital age. However, neither explicitly mentions choreography, and as can be understood by the dates of the treaty, both predate the widespread international use of music videos, short-form video platforms such as TikTok, and the general significant changes related to technological advancement and globalization. With the dawn of the era of artificial intelligence, these treaties are mentioned here as examples of how out of date the current international frameworks are in relation to the copyright protections for content that is digitized and shared rapidly around the world at the click of a button, reaching potential audiences of billions overnight with systems for instant monetization.

Both the Berne Convention and the WIPO treaties have created a basic form of harmonization for internationally recognizing copyright protections. However, they are now severely out of date. As an example of one area in which South Korea could potentially diverge from the treaties to use as the basis for a new international system of rules, the minimum 50-year protection for copyright seems far too long for online trends which are defined by their ephemeral nature. Such trends may meet the minimum requirements for originality and creativity, but the treaties that set 50 years as the minimum duration of protection were made at a time when it would take months, years, or even decades for a creator to monetize and profit from their creations. In today's faster-moving world, monetization and profiting from choreographic creativity can happen overnight. The rapid international dissemination of short-form choreography on platforms such as TikTok requires a much more flexible and faster-moving system of protection. This opportunity for South Korea will be discussed further in the following South Korea: Challenges and Opportunities section.

5. South Korea: Existing Protections

Under the current South Korean legal system, the Copyright Act 2003 includes choreography as a type of "work" under Article 4, Clause 3: "the following shall be the examples of works referred to in this Act... Theatrical works, including dramas, choreographies, pantomimes etc." [46]. However, in the last five years, only 191 copyrights for choreography have been registered, which is 0.061% of all copyrights that were registered in that period [47]. Despite the scale of the performing arts and music industry, which relies heavily on choreography, the insignificant number of applications for protection reveals the perception among choreographers in South Korea that their work cannot be easily quantified, protected, and monetized under the existing system.

As part of a recent survey of industry norms, it was found that an estimated 40% of choreographers do not have written contracts for their work [48]. When they do have contracts, they often work in groups and are paid upfront as part of a fixed-term contract with no expectation that the choreography they create will be protectable or monetizable by them as individuals [48]. The participants in the survey had an average of 6.75 years of experience in the industry and 72.2% reported that "lack of information and difficulty in the registration process" was the main reason for the inability to copyright their work [48]. Despite this, rising awareness of the importance of copyright has followed a high-profile controversy between the internationally famous K-Pop groups NewJeans and ILLIT, with the CEO of NewJeans' agency, Min Hee-jin, claiming that choreography she had created for NewJeans was copied without credit by ILLIT, who are managed by Ador's main rival, HYBE [49]. Following the accusations of choreographic plagiarism between these two high-profile rivals, in a separate case, a choreographer was recently recognized by the courts as the copyright owner of a piece of choreography that was used in a bank commercial [50]. The awareness raised by these cases is contributing to the debate around the rights of choreographers, but these are rare examples. In the case of Ador and HYBE, the lack of clarity around the protection of the choreography shows the difficulty that even the most well-resourced stakeholders have in protecting their choreographic creations in South Korea.

Although original choreography receives some copyright protection when it is created, without registration, the protection is limited as it is often challenging to identify the original creator of a piece of choreography. In 2011, an early case on the issue of choreography copyright found in favor of the claimant that a dance academy had

copied the original choreography that he had created for a track called “Shy Boy”; however, the case showed how difficult it was to prove the imitation, and the court found only partially for the claimant [50]. The current registration process for choreography requires following a process that is used for all copyrights. An application form is completed and submitted to the Korea Copyright Commission (KCC) and applicants are advised to include a description of the originality, the date created, and a copy of the choreography, with forms as diverse as written descriptions and video recordings accepted [51]. For choreographers, the process is opaque, which to some extent explains the lack of applications.

To help choreographers overcome such procedural difficulties, raise awareness of the possibility of copyright protection for choreography, and contribute to the debate about how the law should be developed to better protect choreography copyright, the Korean government recently launched the Korean Choreography Copyright Association. Choreographers can register to become a member of the association. The association describes its work as “support for protection and management of choreographic works, providing advice on the exercise of creative rights, and a place of communication” [52].

Given the very recent creation of the association, assessing its effectiveness in promoting copyright registrations and claims in the courts to protect original works is currently not possible. However, the standardization of a process of copyright application for choreography that is sensitive to the unique and challenging characteristics of recording and registering pieces of movement and differentiating them as original from existing works is an important first step.

6. South Korea: What Can Be Learned and Applied, Challenges and Opportunities

6.1. *Raising Awareness: Pose v Movement, Choreography v Dance*

In recently controversial cases in the South Korean context, such as NewJeans and ILLIT, much of the debate online has been over the comparison of short sections of movement or poses. However, as this analysis shows, jurisdictions around the world specifically differentiate between non-protectable poses or positions and coherent systems of movement. Furthermore, in jurisdictions such as the U.S., a clear distinction is made between dance and choreography. The distinction is mainly based on the coherent entirety of a performance and short sections of movement cannot be protected by copyright under these jurisdictions. Although this distinction has not yet been made in the mind of the South Korean public, it would be a useful distinction to make to avoid unnecessary conflict over similar-looking poses in a dance piece, which should be excluded from copyright.

However, there is another potential approach. The controversy over shorter forms of movement, that would be considered unprotectable in existing legal systems around the world, may indicate that there is a demand from the public for a different approach. In the fast-paced world of TikTok and other short-form video platforms, the public places significant value on dances that may only last a few seconds. Part of this appreciation may be based on the fact that these videos can attract billions of views and high levels of monetization in a short space of time. When the earliest forms of copyright protection developed over one hundred years ago, this was not possible. Rather than tell the public that their instincts about fair use are wrong, it may be time to update the copyright protections for choreography and dance to reflect modern technology and sensibilities.

6.2. Originality, Creativity, and Personality

As has been seen across the analysis of various jurisdictions, the understanding of what meets the minimum requirements of originality and creativity varies. There is no international standard for either, and even the methods of fixation, which would constitute the basis of any comparison of different works, vary drastically. A solution that can emerge from South Korean innovation may be found in the French understanding of creativity as an expression of personality.

The first step in creating a standardized approach to originality and creativity in choreography and dance is the evaluation of the movements and the extent to which they are something new. Historically, notation systems such as Labanotation and Benesh Movement Notation have been used to transcribe physical movement into a standardized form [54]. A discussion of how developments in artificial intelligence could facilitate an objective and standardized approach to assessing the originality of a piece of movement follows. However, artificial intelligence may also provide some insight into the French concept of personality.

If artificial intelligence was used to check the similarity of movements in a piece of choreography or dance to existing pieces, it could also recognize patterns that persist across the creative works of one or more creators. These similarities could form the basis of an objective measure of the personality of a piece of work. For example, a particular choreographer may have a distinctive approach that persists across various pieces of work. Assessment of each piece could recognize these similarities and form the basis of the “personality” of the creator’s works.

6.3. Collective Management Organizations

For South Korean choreography to be effectively protected around the world, South Korea should establish Collective Management Organizations (CMOs) based on European examples such as the Société des Auteurs et Compositeurs Dramatiques (SACD) in France [54]. The CMOs offer collective actions in a wide variety of jurisdictions with specialist advisors focused on specific jurisdictions. However, their main role is to handle the sometimes large number of requests for the use of work protected by copyright. When a potential user of a work protected by copyright wants to apply to use a work and pay the necessary fees, they know where to apply and the process is standardized, making it much more likely that they will apply for permission rather than risk enforcement action.

Although the Korean Choreography Copyright Association is a step in the right direction, expertise on the variation in copyright protections across national and supranational jurisdictions is required to effectively deal with requests for use and to register and enforce claims. The U.S. example of managing rights as individuals or with individualized legal advice has proved to be less effective and more complex than the CMOs that exist in Europe [7]. Given the significant potential of monetizing existing and recorded choreography and the future scope for growth, any investment in CMOs for South Korean creators will prove efficient and profitable in the long run.

6.4. Protection of the short form? Is AI the solution?

On the other hand, South Korea may want to pioneer the protection of short-form dances, as well as protecting

longer-form choreography, whether it is published on short-form social media like TikTok or not. One area that could be addressed is the ease of registering for copyright on such platforms. AI is currently used with some success to check for the use of work protected by copyright in various media, and pioneering research is also being conducted on using the digitization of movement to check for existing copyright protection and the similarity or the originality of movement. Recent research reveals that the physical movements of an individual dancer can be assessed to the extent that the patterns of their movements are as identifiable as a fingerprint [55]. Artificial intelligence is already being used to create accurate and precise Labanotation [56]. The development of these systems for choreography, as it is understood under current legal systems, could aid in the rapid and accurate assessment of what is truly original and could be protected. If these systems were also added as options to short-form content platforms, they could also overcome many of the existing obstacles to the accurate and fair protection of creative short dances, such as those that rapidly go viral and could be monetized in life-changing ways for their creators.

The obstacles to short-form dances being protected are the difficulty in assessing what is original and accessibility for the creators, who are often unfamiliar with their rights. If South Korea developed applications that acted in the same way as plagiarism checkers for text but applied to short-form video, the applications could provide instant feedback on the originality of a dance, no matter how short, by comparing it to the vast datasets available to artificial intelligence. A quick and simple system of applying for protection could be included, and the protection or monetization could begin immediately, with the same system adding the now protected moves into its set of protected choreography or dance moves. In the same way that algorithms are used to find copyright-violating video uploads on YouTube, the dataset of protected choreography or dance moves could be used as a reference set for algorithms specifically designed to detect similarities based on this type of artificial intelligence notation.

6.5. The AI Future and Length of Protection: Is 50 or 70 years too long?

If South Korea takes advantage of the opportunity provided by recent developments in artificial intelligence, it could lead to a revolution in the protection and monetization of dance and choreography. Since the signing of the Berne Convention, the ephemeral and subtle nature of dance movements has posed a practical obstacle to the copyright protection of choreography in a way that would fairly reward the creatives who innovate and develop the industry in a way that matches the importance of dance and choreography in the experience of performing arts and music.

However, if such a system was developed, there is a risk that over-protection would stifle innovation. The systems would have to develop in a way that balances the need for creative expression that uses existing forms of dance. The Berne Convention and subsequent developments of copyright law around the world were often focused on works such as literature, music, and physical design. For creators to benefit from their work, time was needed for the work to be disseminated and paid for. However, the monetization of a book was always very different from the monetization of a dance. It is only in recent years, with the development of social media and the ability to record and spread videos of dance, that the widespread monetization of dance and choreography has become a genuinely viable prospect. There is now an instant record of when a dance was recorded and uploaded and where it is being viewed, something that was almost impossible before the digital era. The awkward and ineffective

compromises of “writing down” dance moves and choreography in legal systems around the world highlight the dissimilarities between arts such as literature and choreography.

Given these differences and the potential for the rapid creation of original dance and choreography, it seems unnecessary to have a minimum duration of 50 years of protection as stipulated by the Berne Convention for all forms of dance and choreography. For highly sophisticated and long works, such as an original ballet performance, the extensive protection might be justified and reflects the time and effort put into the creation of the work. However, short-form dance and even music video choreography are very different in nature. If one of the obstacles to providing protection for creators of such work is that the protection would stifle the next fifty years of innovation as nobody would be able to use the work without permission, most creators would probably prefer to accept a short and quick route to monetization with a lower standard required for protection.

For example, if a TikTok dance of a few seconds goes viral, it may be popular for a few days or months, but most will no longer be monetizable within a relatively short period of time. Dance trends are replaced quickly. It is their nature. Therefore, a fifty-year protection is unnecessary. A creator can benefit from their creation over a short period of time, and when the protection is removed after a relatively short period of 12 months of something similar, the dance then becomes available to other creators to use as the basis for something newly original and creative. In this way, the creator’s rights are effectively balanced with the needs of the industry and better suit the developments in technology and social norms in recent years.

7. Conclusion

The research questions that this paper aimed to answer were as follows: what are the strengths and weaknesses of existing systems of copyright for choreography in North America, Europe, and Asia? How do international treaties affect or inform the development of these systems? What are the gaps in South Korea’s legal framework for copyright protection of choreography? How can the lessons learned from the comparative analysis be applied to South Korea?

By answering these questions through the analysis, a significant opportunity for South Korea to play a leading role in the transformation of how choreography and dance are registered, protected, and monetized internationally, facilitated by the rapid advances of artificial intelligence and how it can be applied to recordings of human movement. From major labels such as HYBE and Ador to the proliferation of online platforms where dance and choreography dominate content production, South Korea is well-positioned to lead the world with this digital dance revolution.

Further research is required to assess the accuracy of artificial intelligence notation of choreography and dance. Research also needs to inform the definitions of what is original and creative and how expressions of a creator’s personality can be incorporated into artificial intelligence assessments. Research on applications that integrate such systems and how they can be standardized internationally and finally replace existing and outdated protections such as those found under the Berne Convention and WIPO treaties.

If these challenges can be overcome, for the first time in the human history of dance, the creators of dance will be

protected and incentivized fairly. The age of artificial intelligence may facilitate a golden age of innovation and creativity in possibly the oldest form of human artistic creativity – dance, and South Korea has the opportunity to lead the way.

References

- [1]. H. J. Jin and J. Kim. (2017, Feb.). “Effects of the ‘Gangnam Style Syndrome’ on the South Korean stock market.” *Journal of Cultural Economics*. 42, pp. 139-161. Available: <https://doi.org/10.1007/s10824-017-9291-3> [2025].
- [2]. “Gangnam Style statue build in South Korea’s Seoul.” Internet: <https://www.bbc.com/news/world-asia-34744836>, Nov. 6, 2015 [2025].
- [3]. V. Gite and R. Deshmukh. (2023, May). *K-pop Events Market Size, Share, Competitive Landscape and Trend Analysis Report, by Type (Rock, Jazz, Pop, Others), by Revenue Source (Tickets, Sponsors, Others), by Gender (Male, Female): Global Opportunity Analysis and Industry Forecast, 2021 – 2031*. Available: <https://www.alliedmarketresearch.com/k-pop-events-market-A47369> [2025].
- [4]. “Moral Rights.” Internet: [https://uk.practicallaw.thomsonreuters.com/9-506-4493?transitionType=Default&contextData=\(sc.Default\)&firstPage=true](https://uk.practicallaw.thomsonreuters.com/9-506-4493?transitionType=Default&contextData=(sc.Default)&firstPage=true), 2025 [2025].
- [5]. D. B. V. Kaye, A. Rodriguez, P. Wikstrom. (2020, Oct.). “You Made This? I Made This: Cultures of Automatic (Mis)Attribution On TikTok.” *AoIR Selected Papers of Internet Research*. [On-line]. Available: <https://doi.org/10.5210/spir.v2020i0.11354> [2025].
- [6]. “Feist Publications, Inc. v. Rural Tel. Serv. Co., 499 U.S. 340 (1991).” Internet: <https://supreme.justia.com/cases/federal/us/499/340/>, Mar. 27, 1991 [2025].
- [7]. A. Mathur and B. Osazuwa. “Dancing with Rights: Analyzing Copyright for Choreographic Works in the United States.” Internet: <https://itsartlaw.org/art-law/dancing-with-rights-analyzing-copyright-for-choreographic-works-in-the-united-states/>, Jul. 22, 2024 [2025].
- [8]. “Copyright Registration of Choreography and Pantomime.” Internet: <https://copyright.gov/circs/circ52.pdf>, Oct. 2022 [2025].
- [9]. European Innovation Council and SMEs Executive Agency. “Epic Games Settles Fortnite Dance Copyright Dispute – Update on OpenAI v Authors.” Internet: https://intellectual-property-helpdesk.ec.europa.eu/news-events/news/epic-games-settles-fortnite-dance-copyright-dispute-update-openai-v-authors-2024-02-23_en, Feb. 23, 2024 [2025].
- [10]. “Hanagami v. Epic Games, Inc., 85 F.4th 931 (2023).” Internet: https://fkks.com/uploads/news/Hanagami_v_Epic_Games_Inc.pdf, 2024 [2025].
- [11]. “Bikram’s Yoga College v. Evolution Yoga, No. 13-55763 (9th Cir. 2015).” Internet: <https://law.justia.com/cases/federal/appellate-courts/ca9/13-55763/13-55763-2015-10-08.html>, Oct. 8, 2015 [2025].
- [12]. R. Hampton and M. M. Kircher. “The Creators of the ‘Up’ Dance on Watching Addison Rae Go Viral With Their Moves.” Internet: <https://slate.com/culture/2021/04/addison-rae-jimmy-fallon-cardi-b-up-dance-creators-interview.html>, Apr. 3, 2021 [2025].
- [13]. “Copyright Act: R.S.C., 1985, c. C-42.” Internet: <https://laws-lois.justice.gc.ca/eng/acts/c-42/fulltext.html>, Nov. 7, 2024 [2025].

- [14]. “Choreography and Copyright – Some Comments on Choreographic Works as Newly Defined in the Canadian Copyright Act.” Internet: <https://www.robic.ca/en/?publications=choreography-and-copyright-some-comments-on-choreographic-works-as-newly-defined-in-the-canadian-copyright-act>, Jan. 1, 2003 [2025].
- [15]. Canadian Alliance of Dance Artists – East Chapter 2025. “Professional Standards for Dance.” Internet: [psd_table_of_contents](#), 2021 [2025].
- [16]. “Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on copyright and related rights in the Digital Single Market and amending Directives 96/9/EC and 2001/29/EC (Text with EEA relevance).” Internet: <https://eur-lex.europa.eu/eli/dir/2019/790/oj/eng>, Apr. 17, 2019 [2025].
- [17]. “The doctrine of fair use: Limits and freedoms of legitimate use.” Internet: <https://letslaw.es/en/the-doctrine-of-fair-use-limits-and-freedoms-of-legitimate-use/>, May 27, 2024 [2025].
- [18]. K. Erickson. “Parody & Pastiche.” Internet: <https://www.copyrightuser.org/understand/parody-pastiche/>, May 18, 2017 [2025].
- [19]. “Judgment of the Court (Fourth Chamber) of 16 July 2009. Infopag International A/S v Danske Dagblades Forening. Reference for a preliminary ruling: Hojesteret – Denmark. Copyright – Information Society – Directive 2001/29/EC – Articles 2 and 5 – Literary and artistic works – Concept of ‘reproduction’ – Reproduction ‘in part’ – Reproduction of short extracts of literary works – Newspaper articles – Temporary and transient reproductions – Technological process consisting in scanning of articles followed by conversion into text file, electronic processing of the reproduction, storage of part of that reproduction and printing out. Case C-5/08.” Internet: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62008CJ0005>, Jul. 16, 2009 [2025].
- [20]. “Judgment of the Court (Third Chamber), 1 March 2012. Football Dataco Ltd and Others v Yahoo! UK Ltd and Others. Reference for a preliminary ruling from the Court of Appeal (England & Wales)(Civil Division). Directive 96/9/EC – Legal protection of databases – Copyright – Football league fixture lists. Case C-604/10.” Internet: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62010CJ0604>, Mar. 1, 2012 [2025].
- [21]. “Copyright in France.” Internet: <https://www.casalonga.com/actualites-et-documentation-pi/droit-d-auteur/le-droit-d-auteur-en-france-230/Copyright-in-France.html?lang=en>, 2021 [2025].
- [22]. H. Lovells. “Copyright in France.” Internet: <https://www.lexology.com/library/detail.aspx?g=db4300b2-84aa-4a2a-acc3-e786453798ec>, Jul. 31, 2019 [2025].
- [23]. “Copyright, Designs and Patents Act 1988.” Internet: <https://www.legislation.gov.uk/ukpga/1988/48/contents>, Sept. 16, 2025 [2025].
- [24]. D. Irving and B. Challis. “Dancing a Fine Line: Choreography and Copyright.” Internet: <https://cadawest.org/images/choreography-and-copyright-british.pdf>, 2008 [2025].
- [25]. C. McGeough. “TikTok trends and the potential for copyright infringement.” Internet: <https://www.harpermacleod.co.uk/insights/tiktok-trends-and-the-potential-for-copyright-infringement/>, May 4, 2022 [2025].
- [26]. “Green v Broadcasting Corporation of New Zealand [1989] 2 All ER 1056.” Internet: https://www.oxbridgenotes.co.uk/law_cases/green-v-broadcasting-corporation-of-new-zealand [2025].
- [27]. “Norowzian v Arks Ltd (No.2) [2000] EMLR 67.” Internet:

- https://www.oxbridgenotes.co.uk/law_cases/norowzian-v-arks-ltd-no-2 [2025].
- [28]. “Civil Code of the Russian Federation.” Internet: <https://rospatent.gov.ru/en/documents/grazhdanskiy-kodeks-rossiyskoy-federacii-chast-chetvertaya>, Dec. 22, 2006 [2025].
- [29]. S. L. Levitsky. (1982, Jan.). “The Beginnings of Soviet Copyright Legislation 1917-1925.” *The Legal History Review*. [On-line]. 50(1), pp. 49-61. Available: <https://doi.org/10.1163/157181982X00035> [2025].
- [30]. “Copyright Research and Information Center.” Internet: <https://www.cric.or.jp/english/index.html> [2025].
- [31]. “Experts in International Trademark Registration and Protection.” Internet: <https://igerent.com/> [2025].
- [32]. “Case number 2008 (wa) 9300.” Internet: <https://www.ip.courts.go.jp/eng/vc-files/eng/file/000680.pdf>, Feb. 28, 2012 [2025].
- [33]. “Case number 2015 (wa) 2570.” Internet: https://www.ip.courts.go.jp/app/files/hanrei_en/530/002530.pdf, Sept. 20, 2018 [2025].
- [34]. T. Kawase. “Is Choreography for Dance Considered a ‘Work of Authorship’? ~Explaining the Precedents~.” Internet: <https://monolith.law/en/internet/dance-choreographer-copyright>, Jan. 22, 2024 [2025].
- [35]. “The Copyright Act, 1957 (14 of 1957).” Internet: <https://www.copyright.gov.in/Documents/Copyrightrules1957.pdf>, June 4, 1957 [2025].
- [36]. A. M. Mustaque. “Anupama Mohan vs State of Kerala.” Internet: <https://indiankanoon.org/doc/7187826/>, Nov. 12, 2015 [2025].
- [37]. Supreme Court of India. “Acedemy of General Education, Manipal and Anr. V. B.Manini Mallya.” Internet: <https://www.casemine.com/judgement/in/5767b117e691cb22da6d2e92>, Jan. 23, 2009 [2025].
- [38]. “Copyright Office.” Internet: <https://copyright.gov.in/> [2025].
- [39]. “China CN031.” Internet: <https://www.wipo.int/wipolex/en/text/466268>, Feb. 26, 2010 [2025].
- [40]. European Innovation Council and SMEs Executive Agency. “Copyright protection in China: A Guide for European SMEs.” Internet: https://intellectual-property-helpdesk.ec.europa.eu/ip-management-and-resources/publications/copyright-protection-china-guide-european-smes_en, Apr. 29, 2021 [2025].
- [41]. Y. Wan. “Chapter 23: Moral rights in China” in *Research Handbook on Intellectual Property and Moral Rights*. Y. Gendreau, Ed. Edward Elgar Publishing, 2023, pp. 1-582.
- [42]. R. Su. (2023). “The Core of Dance Works’ Protection in Chinese Copyright Law.” *Science of Law Journal*. [On-line]. 2, pp. 15-23. Available: <https://doi.org/10.23977/law.2023.020403> [2025].
- [43]. J. Yuqiao and L. Kang. “Chinese dance show suspected of plagiarism, raises concerns about copyright protection.” Internet: <https://www.globaltimes.cn/page/202205/1266397.shtml>, May 23, 2022 [2025].
- [44]. “Summary of the Berne Convention for the Protection of Literary and Artistic Works (1886).” Internet: https://www.wipo.int/treaties/en/ip/berne/summary_berne.html [2025].
- [45]. R. Bhuvaneswari. (2024, Nov.) “Copyrights Protection of Dance Choreography – Problems and Prospects.” *International Journal for Multidisciplinary Research*. [On-line]. 6(6). Available: <https://doi.org/10.36948/ijfmr.2024.v06i06.31431> [2025].
- [46]. “Copyright Act.” Internet: https://elaw.klri.re.kr/eng_service/lawView.do?lang=ENG&hseq=32626, Dec. 30, 2013 [2025].

- [47]. J. Kim. "NewJeans, ILLIT and the law: The future of dance copyrights in Korea." Internet: <https://koreajoongangdaily.joins.com/news/2024-05-30/entertainment/kpop/NewJeans-ILLIT-and-the-law-The-future-of-dance-copyrights-in-Korea/2057922>, May 30, 2024 [2025].
- [48]. Nova. "K-Pop Choreographers Face Contractual Challenges, Survey Reveals." Internet: <https://www.kpopmap.com/k-pop-choreographers-face-contractual-challenges-survey-reveals/>, Jul. 30, 2024 [2025].
- [49]. J. Kim and M. Kim. "ADOR performance directors point to ILLIT's alleged choreography plagiarism." Internet: <https://www.chosun.com/english/kpop-culture-en/2024/05/14/OBDCAARZR5GM5I4VIDYCY2QH3I/>, May 14, 2024 [2025].
- [50]. KTimes. "Will standards emerge to resolve NewJeans, ILLIT choreography dispute?" Internet: <https://www.koreatimes.co.kr/entertainment/k-pop/20241224/will-standards-emerge-to-resolve-newjeans-illit-choreography-dispute>, Dec. 25, 2024 [2025].
- [51]. "Copyright, enhancing the value of culture." Internet: <https://www.copyright.or.kr/eng/main.do> [2025].
- [52]. "Korea Choreography Copyright Association." Internet: <https://www.koccoa.or.kr/> [2025].
- [53]. M. Hoggatt. "Primary Sources for Performing Arts Research." Internet: <https://guides.library.harvard.edu/c.php?g=1294023&p=9509243>, Jun. 21, 2023 [2025].
- [54]. "Societe des Auteurs et Compositeurs Dramatiques." Internet: <https://www.sacd.fr/fr> [2025].
- [55]. M. Hanson. "New AI can identify you by your dancing 'fingerprint'." Internet: <https://bigthink.com/high-culture/a-i-dancing-fingerprint/>, Jan. 24, 2020 [2025].
- [56]. B. Chen, J. Wang, Z. Miao, J. Li, S. Yang. (2023, Oct.) "Analysis of Labanotation generation based on motion capture data." *Fifth International Conference on Artificial Intelligence and Computer Science (AICS 2023)*. [On-line]. Available: <https://doi.org/10.1117/12.3009423>.