



The IP Federation's response to the AI and IP consultation

Founded in 1920 in the UK, the IP Federation represents IP intensive companies who are extensively involved in business activity in the UK and internationally across a range of industries. Our membership includes companies that invest billions in developing and using AI technologies to build the solutions of tomorrow. In developing and using these technologies our members appreciate the importance of creating the right incentives to build, use and share AI technology. In particular, our members recognise the critical role artificial intelligence (AI) will play in innovation, driving breakthroughs across the diverse industry sectors of our membership including healthcare, manufacturing, cybersecurity and the automotive industry. Details of the IP Federation membership are given at the end of this paper.

The IP Federation is pleased to submit this response to the IPO's consultation on artificial intelligence and intellectual property. **The members of the IP Federation agree that it is vital for the UK to encourage investment and innovation in AI.**

Section A

Computer generated works

1. Do you currently rely on the computer-generated works provision? If so, please provide details of the types of works, the value of any rights you license and how the provision benefits your business. What approach do you take in territories that do not offer copyright protection for computer-generated works?

There is no evidence of any member company making use of this provision.

2. Please rank these options in order of preference (most to least preferred) and explain why.

Option 0 Make no legal change

Option 1 Remove protection for computer-generated works

Option 2 Replace the current protection with a new right of reduced scope/duration

3. If we introduce a related right for computer-generated works, as per option 2, what scope and term of protection do you think it should have? Please explain how you think this scope and term is justified in terms of encouraging investment in AI-generated works and technology.

The provision for the protection of computer-generated works is not relied upon by our members. This suggests that there is not a need for such provision and therefore no need to introduce a related right for computer generated works as per option 2, where there is no human author.

Copyright should continue be granted to the author of a work who contributes artistic skill and labour. There are instances where AI may be relied on as a tool to generate content. For example, we have seen from OpenAI's GPT-3 model that AI can generate content, however the copyright system should incentivise the operator who uses skill and judgment to influence and select the form or content of the output, which would be the case under the current law

4. What are your views of the implications of the policy options and of AI technology for the designs system?

5. For each option, what are your views on the risk that AI generated works may be falsely attributed to a person?

Text and Data Mining (TDM)

6. If you license works for TDM, or purchase such licences, can you provide information on the costs and benefits of these? For example, availability, price-point, whether additional services are included or available, number and types of works covered by the licence etc.

No information has been provided from members.

7. Is there a specific approach the government should adopt in relation to licensing?

No, it would be better for government to clarify the law to enable use of lawfully accessible works for TDM. Machine learning relies on vast quantities of data. Text and data mining, which works by crawling thousands of different digital sources, is a way to obtain large amounts of public data for the purposes of training models and AI. As long as the TDM user has legal access to a copyright-protected work, either through a license or because they are publicly accessible, they should not have to acquire an additional license to mine that content for the purposes of machine learning. **Text and data mining is an automated way to read content one already has access to and should not be subject to additional licences**, unless the data owner has opted out.

8. Please rank the options in order of preference (most to least preferred) and explain why.

Option 3 Adopt a TDM exception for any use, with a rights holder opt-out

Option 4 Adopt a TDM exception for any use, which does not allow rights holders to opt out

Option 2 Extend the existing TDM exception to cover commercial research and databases

Option 1 Improve licensing environment for the purposes of TDM

Option 0 Make no legal change

We reference the IP Federation's policy paper entitled "The UK needs to adopt a broader text and data mining (TDM) exception to copyright infringement" dated 4 December 2020¹.

The current text and data mining (TDM) exception in the UK remains limited

In January 2020, the UK Government announced that, in light of its withdrawal from the European Union (EU), it would not be implementing 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 (EU Copyright Directive) that was adopted in June 2019.

Indeed, several EU Member States are beginning to transpose the EU Copyright Directive into national law.

The EU Copyright Directive overhauled EU copyright rules and provides for a broadened exception to copyright infringement for text and data mining (TDM) activities, whereby commercial and non-commercial entities can mine copyright content they have lawful access to, unless rightsholders explicitly reserve their rights in an appropriate, machine-readable manner. The EU introduced the broadened exception upon recognising that the exception is

¹ <https://www.ipfederation.com/download/the-uk-needs-to-adopt-a-broader-text-and-data-mining-tdm-exception-to-copyright-infringement/?wpdmdl=15770>

essential for EU researchers and entities of all kinds to compete effectively in the rapidly growing digital economy. TDM enables the development and training of artificial intelligence (AI) applications that offer vast potential for society benefit, economic growth and increased competitiveness globally.

By not implementing the EU Copyright Directive, the UK is left with the current UK copyright rules² which provide for a limited TDM exception “for the sole purpose of research for a **non-commercial** purpose” (emphasis added), leaving out a wide array of TDM (including machine learning) techniques to develop breakthrough innovations. This could leave the UK at a significant disadvantage to the rest of the EU and threaten the UK’s ambition to become a powerhouse in AI. A “new tech arms race” has emerged among many of the world’s leading economies, including US, Canada, China, Japan, and Singapore, where many of these economies have implemented broader TDM copyright exceptions than Europe and / or are able, under certain circumstances, to make use of fair dealing / fair use provisions.

It is critical that the UK Government encourage and foster an environment where a UK **TDM copyright exception is provided which is not unnecessarily burdened and remains accessible to all entities that already have lawful access to text and data they wish to mine, for all purposes. We urge the rapid implementation of such an exception particularly given that there is already precedent globally as to how TDM exceptions may be implemented in legislation.**

As such, IP Federation is supportive of Option 3: “Adopt a TDM exception for any use, with a rights holder opt-out”.

A broad UK TDM exception is required to bolster innovation and reflect the realities of 21st century research

Digital transformation requires new ways to read, analyse and understand a vast array and amount of information: AI is critical to that effort. TDM and machine learning form the backbone of AI and rely on aggregating both raw and structured data and content into a machine accessible form and analysing this information – often at hyper scale – to identify insights, patterns and relationships.

Several of IP Federation’s members develop, deploy and use AI technology products and services, for the benefit of the public. Continuing development and advancement of AI technology requires access to data and we urge the UK government to prioritise this issue.

Copyright laws need to reflect the realities of 21st century research, where the growing use of big data and AI tools in research and innovation are necessary to achieve breakthroughs and now result from the seamless collaboration between start-ups, SMEs, research groups, academics, not-for-profits, government and businesses. **The ability to unlock benefits from AI, for example in innovative projects benefitting the public, should exist for all entities and for all purposes.** Most recent examples of these public-private collaborations include the unprecedented efforts³ made in order to create and mine datasets to find vaccines and cures for COVID-19.

² Section 29A, CDPA 1988 (as amended)

³ <https://uk.usembassy.gov/call-to-action-to-the-tech-community-on-new-machine-readable-covid-19-dataset/>

Remaining a global champion in AI innovation

The UK Government recognised in its [Industrial Strategy](#)⁴, [AI Sector Deal](#)⁵ and more recently, the National AI Strategy⁶, the necessity for public and private entities to collaborate for the country to be able to compete globally in the fast-moving field of AI. Failure to implement a UK TDM regime for **commercial and non-commercial** purposes is having, and will continue to have, a hampering effect on AI development and commercialisation in the UK.

By not updating its copyright rules, access to and the ability to mine data will be curtailed, and the UK is running the risk that its best AI talent and investment capital will migrate to the EU or other jurisdictions with more TDM- and AI-friendly laws. For instance, Japan, the US, Canada, China and Singapore, several of the UK's key trading partners, have either already adopted or are in the process of implementing broader mandatory exceptions to their copyright laws and / or fair dealing / fair use provisions to remove barriers to text and data mining and enable machine learning.

The UK can implement a balanced TDM exception

If the UK is to keep pace with the rest of the world, the IP Federation's members believe it is absolutely necessary that the Copyright, Design and Patent Act (CDPA) be amended to **expressly allow for the reproduction of lawfully accessed works to facilitate TDM, for commercial or non-commercial purposes**. For the avoidance of doubt, works that are lawfully accessed would include, but not be limited to, publicly available works.

A balanced, future-proof TDM exception can be found, one that would simultaneously foster innovation while safeguarding copyright owners' legitimate interests. The rightsholder should be entitled to opt its works out of the copyright exception for TDM for commercial purposes, provided that it is required to do so in an appropriate manner, including requiring the use of machine-readable steps in the case of data publicly accessible online. The ability to control usage of copyright works contractually where the work is confidential information or know-how etc (unpublished work) should continue to exist. This is the effect of the approach taken under Article 3 and Article 4 of the EU Copyright Directive.

In any exception, it is important that all entities be allowed to store copies of work made in the course of authorized data mining activities for as long as is necessary for TDM purposes. This ensures that AI outcomes can be reviewed, validated, and revisited as necessary to verify results, and is consistent with laws under Articles 3 and 4.

In summary, the IP Federation strongly urges the **UK Government to adopt a broad TDM exception that will promote a fair and balanced research and innovation ecosystem in the UK**.

This position is stated in our response to the IPO's call for views on AI and IP and we would be very willing to take part in additional dialogue on this issue.

In relation to option 4, while this is not the preferred option IP Federation generally, some members would be in favour of no opt out. These members note that copyright owners whose works are lawfully acquired by users are not harmed by any approach that clarifies that

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/702810/180425_BEIS_AI_Sector_Deal_4_.pdf

⁶ <https://www.gov.uk/government/publications/national-ai-strategy>

copyright cannot be used to restrict TDM activities. Nothing would limit the rights holders' use of non-copyright measures to restrict access – for example, by placing them behind a paywall or using other access-credentials to limit access and as such an opt out is not necessary. It is also noted that some members would not support a TDM exception without an opt out as they believe that this lacks a balanced approach; therefore, this would not be considered to be the second favoured option by these members.

9. *If you have experience of the EU exception with opt out for rights holders, how has this affected you?*

10. *How would any of the exception options positively or negatively affect you? Please quantify this if possible*

Patent Inventorship

11. *Please rank these options in order of preference (most to least preferred) and explain why?*

Option 0 Make no legal change

Option 1 “Inventor” expanded to include humans responsible for an AI system which devises inventions

Option 3 Protect AI-devised inventions through a new type of protection

Option 2 Allow patent applications to identify AI as inventor

IP Federation members are keen to continue to be able to protect R&D investments which result in patentable subject matter. There is however some divergence among members on how to define the term invention, which has led to some members questioning whether humans will continue to be considered part of the inventive process and whether AI will ever be able to “invent independently”. In the comments below we set out the implications of recognising AI inventorship status.

The majority of members of IP Federation are of the opinion that no legal change under option 0 should be made to patent inventorship. Making no legal change to patent inventorship would be the best option for supporting further investment and innovation in the area of AI.

IP Federation members are keen to continue to be able to protect R&D investments which result in patentable subject matter. The majority of our members believe that option 0 will not prevent organisations from patenting inventions where AI has been used as a tool to discover a concept that leads to an invention. A human will have an ongoing role as an inventor, even when AI has enabled the discovery of an invention. The role of the human inventor will continue to include the identification, understanding and application of the invention. UK and EPO case law suggests that a new product/method is arbitrary until put to practical use (e.g. CFPH LLC’s Patent Applications (Nos. 0226884.3 and 0419317.3) [2005] EWHC 1589 (Pat) at [34] and Case Law of the Boards of Appeal, I.A.2.2.1). AI systems that output new products exceeding previously attained parameters can be said to have discovered insights and correlations in data. On this basis, **a human recognising the invention is the inventor**. This is also the view in the report commissioned by the EPO⁷ where, in section 2(a)(i), “sheer luck” inventions are patentable and ascribed to a natural person who recognises them (e.g. the discovery of penicillin and its utility). It is also noted

⁷ <https://www.ml4patents.com/blog-posts/a-study-on-inventorship-in-inventions-involving-ai-activity-commissioned-by-the-european-patent-office>

that removing the need for human understanding and recognition of an invention from any definition of invention would raise issues in relation to novelty. AI systems are prevalent in everyday life – the output of an AI system, such as adapted functionality of an autonomous car will be in the public domain. There are parallels to be drawn with why the patent system does not extend to discoveries per se.

IP Federation members are able to identify human inventors where AI has been used as a tool in devising the invention. No member has identified a scenario where they have not been able to protect an invention due to the lack of a human inventor. It is noted that each of the UK IPO, High Court and Court of Appeal, when hearing the "DABUS" case, assumed that DABUS had generated the inventions and, therefore, did not consider the legal and factual basis for whether an AI can "invent".

Changing the way in which inventorship is understood would create legal uncertainty. The alternative options 1, 2 and 3 each assume an AI deviser of the invention. AI solutions are often comprised of building blocks of AI solutions, some components of which are opensource, trained on data obtained from different sources, such as for example medical journals. Moreover, AI services are increasingly provided by platform providers. Identifying humans who are responsible for the entire AI system, or trying to define an "AI inventor", will be in many cases difficult to determine would create considerable uncertainty in legal ownership, **creating more issues that it aims to address.**

Attaching inventorship status to AI systems which comprise algorithms and data would create incentives that would have the effect of stifling AI development. As patent ownership rights flow from the inventor, if this change is made, IP ownership could flow from owning the "inventing AI", such that patent rights would flow from the mere possession of AI systems and data. Companies would be incentivised to hoard data and opensource may become less prevalent. Organisations would assess that there is more value in not sharing algorithms, source code and data, as this may lead to them lose out on ownership of IP rights. Access to AI innovation would not be democratised as ownership would flow back to the "owner" of the AI.

There are also concerns that if the definition of inventor is changed, this will change what is understood as an invention. This could lead to changing standards in assessment of patentability and ultimately degrade patent quality. A proliferation of low-quality patent rights, or lack of legal certainty regarding ownership can create large expenses for businesses which has the potential to affect investment in the UK.

Equally, the role of AI in devising an invention should not prevent an organisation from obtaining patent protection. Rather than approach this question in the manner that was taken in the DABUS case in the UK, it would be helpful to consider the facts surrounding how an invention is recognised and devised and take an evidence-led approach to determine what further guidance is required to assess inventorship in the field of AI. Analogous examples are also evident in the pharmaceutical sector, such as relating to the discovery of Penicillin or the discovery of the therapeutic effect of the API of "Viagra" (for erectile dysfunction) where this was an observation of a side effect of the API in trials for the original indication.

In relation to Option 1 some members can foresee AI in the future being able to 'independently invent' where human involvement would be limited to overseeing / managing the AI.

However, it may be difficult (or indeed impossible) to clearly distinguish such cases from where AI was used as a tool in the invention process (as discussed above). Some members opined that in practice, applicants would name a human as inventor in such cases to ensure that any patentable invention is protectable. As such, 'option 1' to extend the definition of inventor to the human responsible for the AI would become *de facto* practice, at least for cases where there is *de minimis* human involvement.

Thus, if any legal changes are to be considered, 'option 1' might be appropriate as this would formalise the inevitable practice of naming a human inventor where AI was used during the inventing process. This legal change would not be inconsistent with the assumption that human involvement is necessary for an invention to arise from an AI 'tool', but given the difficulty distinguishing the cases it should not be required to state the degree of human involvement when declaring inventorship (i.e. there should be no requirement to specify that the inventor was simply responsible for an AI system which devised the invention).

At least one member supports Option 3 which would be to introduce a new form of IP protection to provide protection for innovations made using AI with or without human contribution. This new AI innovation right could coexist alongside patent rights without the need to modify the patent system.

The rationale for introducing such an AI innovation right is that innovations made using AI are likely to be beneficial to society, for example in areas such as drug discovery, development of new materials and medical diagnosis. Innovations using AI will require investment. Whilst it is possible that innovators using AI will make the appropriate investments even without the prospect of protecting the resulting AI innovations by a suitable IP right, up to now it has been widely accepted that IP rights are a necessary mechanism to give creators and innovators a limited period of commercial exclusivity to achieve an adequate return on their investments in their creations and innovations. This is particularly needed when the investments are large, useful outcomes are difficult to predict or achieve, or the resulting commercial products are easy for others to copy or reproduce.

It therefore seems reasonable to expect that an AI innovation right could serve a useful purpose for society in promoting investment in innovations using AI. Creating a new form of protection, rather than trying to adapt the patent system, seem preferable. Although the patent system has operated successfully for many decades, spanning several industrial revolutions, one key feature of the patent system is that it was conceived for human inventors. Concepts such as inventive step only really make sense when the inventors are human. Also, publishing an invention so that future inventors may build and improve on it makes sense when the future inventors are human beings. And, just as importantly, the supply of inventions is somehow limited by the intellectual capacity of the human race. The supply of inventions (as well as other factors such as the costs of obtaining and maintaining patents and the inventive step standard) influences how many patents exist and, in turn, how many (potentially dangerous) commercial monopolies exist. There will also be limitations, no doubt, on the supply of AI innovations but that supply might far exceed the supply of human inventions in the future.

By having a separate AI innovation right, the patent system can continue to operate for human inventors, with its 20-year term and the other features that, historically, have set suitable limits on the commercial monopolies the patent system creates. And, separately, innovations made using AI, with or without human contribution, can be protected using a different term and with other features different from those of the patent system and suitable to strike the right balance between the reward to the AI innovator and the risk of creating excessive or anti-competitive monopolies.

Other benefits of a new AI innovation right could be to promote knowledge sharing between competitors, standardisation and even awareness, for regulatory purposes, of harmful kinds of AI innovation. AI innovators without access to IP protection are more likely to keep their AI innovations as trade secrets (and some AI innovations, such as algorithms carried out in the cloud, are quite capable of being practised commercially without exposing any details of the innovation). Society as a whole may benefit from an AI innovation right which opens up details of AI innovations and reduces instances of trade secrets, especially if (as predicted) AI and big data really drive innovation and economic progress in the next era.

This is not the place to go into detail about the term and other balance-striking features of the new AI innovation right. Those details can come later and, for the new IP right to truly foster innovation using AI, an international system would be required, with each country offering the same form of protection or as similar as can be agreed. It will do the UK no good to establish only a UK national AI innovation right because AI innovations made in the UK would then be unprotectable in other countries, leaving innovators here at risk of having their AI innovations exploited by free-riders outside the UK. Since the UK is widely admired for its existing IP system, the UK could be a powerful voice internationally in promoting development of the new AI innovation right internationally.

What can be said is that a new right gives the opportunity for introducing new ways of thinking capable of addressing some of the shortcomings of existing IP rights. For example, existing IP rights have a fixed term irrespective of the inputs (e.g. amount of R&D investment required) or outcomes (e.g. what commercial activities are achieved by use of the creation or invention, or the benefit to society). And inventive step (or “cleverness”) is a long-standing feature of the patent system to justify the award of a right but it’s expensive and inefficient to use (requiring large numbers of human examiners in patent offices) and is unreliable in the sense that motivated innovators with the “cleverest” patent attorneys can get rather ordinary inventions patented. A tariff of terms could be available under the new AI innovation right to reward different AI innovations different terms based on their actual inputs and/or outcomes (and potentially dispensing with any “cleverness” measure, or using a “reference” AI system updated frequently to judge the innovative merit of the AI innovation). All terms could even be limited depending on the overall number of AI innovations subject to protection under the new AI innovation right (the more rights granted, the shorter all the terms). Other features could be adopted from other IP rights, e.g., the ways of defining the scope of protection in the patent and design systems with written claims or a graphical representation.

Other members believe that any new sui generis right for AI invented inventions would not provide the right incentives for investment. Anecdotally, the example of the EU Database Rights does not give much encouragement for new sui generis rights. And if such a new right was only for what is created (not the inventive concept embodied therein), the rights can easily be circumvented. As would also be the case if such new rights could only be infringed

by copying. The patent system already works to encourage investment by allowing protection to be obtained for the "inventive concept" for a proportionate time.

12. Would the changes proposed under Options 1, 2 and 3 have any consequential effects on the patent system, for example on other patentability criteria?

Changes proposed under options 1 2 and 3 could (but may not all, see option 3 idea above) require other changes to the patent system. How is novelty assessed if no identification or understanding of the invention is required by a human in the formulation of the invention? What standards should be applied in the assessment of inventive step. Changing these additional provisions could have unforeseen consequences to the stability of the patent system.

13. If UK patents were to protect AI-devised inventions, how should the inventor be identified, and who should be the patent owner? What effects does this have on incentivising and rewarding AI-devised inventions?

Option 1 is expressed as "Inventor" expanded to include humans responsible for an AI system which devises inventions. The humans responsible could be identified as inventors if this is helpful for establishing how title to the invention passes to the patent owner. Presumably title would pass by operation of patent law or contract in the same way as if the humans responsible were inventors of a conventional (non-AI) invention, e.g. from an employee-inventor to the employer. As for the effects, there may be benefits to society from opening up details of AI innovations that would otherwise be kept by AI innovators as trade secrets, see the comments for option 3 in the answer to Q11.

14. In considering the differences between options 1 and 2, how important is it that the use of AI to devise inventions is transparent in the patent system?

There are no requirements as to how a human reaches an invention (e.g. *"It is trite law that irrespective of the jurisdiction in question, an invention may be the result of long, laborious effort, a brief but intense spark of genius or the sheer luck of stumbling upon the heart of the invention or inventive concept by pure chance"* [here](#)).

15. Would the UK adopting option 2 affect your global patent filing strategy, if so, how?

Lack of harmonisation in the patent system globally leads to additional costs for businesses. Different standards applied to inventorship, which lead to differing determination of inventorship in different jurisdictions, could put the validity of the patent in question. Therefore, applicants may choose to only file applications in jurisdictions that have a relatively harmonised approach to inventorship rather than jeopardize a patent family.

For option 3:

16. What term and scope of protection should a new right offer?

17. What should the criteria for grant of a new right be and why? Particularly should it:

- a) Replicate the current requirements for a patent?*
- b) Set a different bar for inventive step?*
- c) Be an automatic or registered right?*

Please refer to the comments for option 3 in the answer to Q11.

General

18. What role does the IP system play in the decision of firms to invest in AI?

The UK enjoys the third highest investment in the world in AI irrespective of patent protection;

There are many reasons to invest in AI irrespective of patent protection;

Companies have accommodated the geographical preferences of AI talent

Local rights (such as the UK's protection for computer generated works and the EU and UK's sui generis database rights) have not obviously promoted local investment.

19. Does the first mover advantage and winner-take-all effect prevail in industries adopting AI? How would this affect the impact of the policy options proposed on innovation and competition?

20. How does AI adoption by firms affect the economy? Does the use of AI in R&D lead to a higher productivity?

21. Do the proposed policy options have an impact on civil society organisations? If so, what types of impacts?

Section B: Respondent information

A: Please give your name (name of individual, business or organisation).

IP Federation

B: Are you responding as an individual, business or on behalf of an organisation?

2) Organisation – please provide the name of the organisation

IP Federation

C: If you are responding on behalf of an organisation, please give a summary of who you represent.

The IP Federation aims to improve the IP framework to meet the needs of innovative industry by representing, nationally and internationally, the views of UK-based businesses. Its membership of influential IP-intensive companies has wide experience of how IP works in practice to support the growth of technology-driven industry and generate economic benefit. As a cross-sectoral industry organisation covering all technologies, the IP Federation is able to offer a viewpoint which is authoritative and balanced.

D: If you are an individual, are you?

N/A

E: If you are responding on behalf of an organisation, are you?

2) An industry body

F: If you are responding on behalf of a business or organisation, in which sector(s) do you operate? (choose all that apply)

3) Manufacturing – Pharmaceutical products

4) Manufacturing – Computer, electronic and optical products

- 5) Manufacturing – Electrical equipment
- 6) Manufacturing – Transport equipment
- 7) Other manufacturing
- 10) Transportation and storage
- 12) Information and communication – Telecommunication
- 13) Information and communication – IT and another Information Services
- 16) Scientific and technical activities
- 17) Legal activities
- 19) Public administration and defence
- 21) Human health and social work activities

G: How many people work for your business or organisation across the UK as a whole? Please estimate if you are unsure.

N/A

H: The Intellectual Property Office may wish to contact you to discuss your response. Would you be happy to be contacted to discuss your response?

The IP Federation would welcome the opportunity for continued dialogue on this matter

I: If you are happy to be contacted by the Intellectual Property Office, please provide a contact email address.

[REDACTED]

J: Would you like an acknowledgement of receipt of your response?

Yes

IP Federation

14 January 2022



IP Federation members 2022

The IP Federation membership comprises the companies listed below. The UK Confederation of British Industry (CBI), although not a member, is represented on the IP Federation Council, and the Council is supported by a number of leading law firms which attend its meetings as observers. The IP Federation is listed on the joint Transparency Register of the European Parliament and the Commission with identity No. 83549331760-12.

AGCO Ltd
Airbus
Arm Ltd
AstraZeneca plc
Babcock International Ltd
BAE Systems plc
BP p.l.c.
British Telecommunications plc
British-American Tobacco Co Ltd
Canon Europe Ltd.
Caterpillar U.K. Ltd
Cummins Ltd.
Dyson Technology Ltd
Eisai Europe Limited
Eli Lilly & Co Ltd
Ericsson Limited
GE Healthcare
GlaxoSmithKline plc
Hitachi Europe Ltd
HP Inc UK Limited
IBM UK Ltd
Johnson Matthey PLC
Merck Sharp & Dohme (UK) Ltd
Microsoft Limited
Mundipharma
NEC Europe
Nokia Technologies (UK) Limited
Ocado Group plc
Pfizer Ltd
Philips Electronics UK Ltd
Pilkington Group Ltd
Procter & Gamble Ltd
Reckitt Benckiser Group plc
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Siemens plc
Smith & Nephew
Syngenta Ltd
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