

From: [Sarah Lewis](#)
To: [Section52CDPA](#)
Subject: Section 52 consultation
Date: 11 December 2015 13:46:36

Re. Section 52 consultation

I am writing from the University of Wales Press, a small not for profit academic publisher about the potential impact of the repeal of s.52 CDPA on our publishing programme, in reiterating the comment in the consultation document on p.11 under the heading "Publishers":

"Publishers have argued that they will need time to make themselves compliant with the new law. Evidence submitted by publishers during the call for evidence and consultation show development plans that generally follow a 5 year projection, of which around 2-3 years are spent on preparation and printing prior to publication. They argue that a 6 month transition period is therefore unlikely to provide sufficient time for publishers to plan their development schedules while factoring in costs such as licensing fees and could lead to abandonment or delay of planned products."

Publishing programmes and schedules are planned, contracted and costed a number of years in advance of publication, as noted in the evidence. 6mths is far too short a period to assess the impact on books in preparation and remaining stocks, not to mention the financial impact of administration costs and possible increase in permissions' fees on a small publisher. Being forced to abandon or delay publication will have a very negative and erosive impact on UWP operating, like others, in a challenging environment for academic publications. Abandonment/delay will reduce the credibility of publishers within the academic community, and deprive the academic market of high quality peer reviewed content which will make a valuable contribution to its field.

We'd request that the timeframe is reconsidered.


Many thanks

Sarah (Lewis)

Sarah Lewis | Head of Commissioning - Pennaeth Comisiynu

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Gall y neges ebost hon, ac unrhyw atodiadau a anfonwyd gyda hi, gynnwys deunydd cyfrinachol a fwriedir i'w ddefnyddio'n unig gan y sawl y'i cyfeiriwyd ato (atynt). Os ydych wedi derbyn y neges ebost hon trwy gamgymeriad, rhowch wybod i'r anfonwr ar unwaith a dilëwch y neges. Os na fwriadwyd y neges ar eich cyfer chi, rhaid i chi beidio â defnyddio, cadw na datgelu unrhyw wybodaeth a gynhwysir ynddi. Mae unrhyw farn neu safbwynt yn eiddo i'r sawl a'i hanfonodd yn unig ac nid yw o anghenraid yn cynrychioli barn Prifysgol

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