

**From:** [Lynne Bryant](#)  
**To:** [Section52CDPA](#)  
**Subject:** Oppose the inclusion of 2D copied and the transitional period  
**Date:** 23 December 2015 16:34:42

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On behalf of Arcaid Images and the 200 photographers and organisations we represent , I write to oppose the inclusion of 2D copied in the repeal of section 52

The transitional period fails to understand the magnitude of the operation in time and money.

Using 'the Consultation On Timing of Repeal of Section 52 CDPA (2014)' it takes 3.5 hours to clear a photograph.

The Government therefore estimates that 1 person could clear 1626 photos over 3 years (assuming there are 253 working days in a year and 7.5 working hours in a day)

Minimum cost of £90,000 and that's only 1626 images .

Even if the money were available the transitional period is only months.

When the photographs where taken inclusion of the objects was legal. Photographers, architects, interior designers ,property companies and publishers were using images to promote their goods and services and behaving legally.

With the inclusion of two small characters , 2D , they are law breakers.

It is an impossible task for all these companies to retrospectively seek licences for a lifetimes work of making and using images .

The instigators of the 2D as well as 3D inclusion are principally Vitra a Swiss company , Cassina an Italian company and Knoll an American company  
The losers are British companies and UK tax collector

Lynne Bryant