

**From:** [Richard Bryant](#)  
**To:** [Section52CDPA](#)  
**Subject:** Transitional arrangements for the repeal of section 52CDPA  
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## Section 52

I support the change in copyright to protect against unlicensed 3D copied being made of specific design objects.

I vehemently oppose the inclusion of 2D copies.

Photography is the most successful tool any business can utilise.  
Inclusion of 2D copies is in itself a disaster for the promotion of design.

The transitional period shows a lack of understanding in the process and failure to see the financial consequences for an array of businesses.  
My clients include leading architects, eg Foster + Partners, designers eg Pentagram, Hotels eg Bulgari , museums, PR and marketing.  
The image is the universal medium.

Airport, hotel, office or home become meaningful spaces once furnished.  
Furnished by professionals who have specified the furniture.

Now they ,the architects and designers and their clients , home and business owners  
are to be penalised for selecting that furniture and using images to promote their work.  
The publication provides a free PR service to the designers of the furniture and lighting.

Visibility is how a design is elevated to a design icon .

What has until now, been a mutually beneficial relationship.  
The extent of in house photo collections is vast .

What of individuals,the home owner and their estate agent , what home is without the occasional light or chair that could be claimed against.

There are no meaningful exceptions for business, no directory of designers, no rules of engagement.

In the space of four months this bill will breakdown working relationships, a distrust between furniture and lightning designers, their clients and their photographers will emerge. Not knowing if additional fees for photographing sites which may include the supplying designers work. The scale of identifying images within a collection that show a design object is vast, many of my clients, having been in business many years have collections close to a million images.

Where is the money to be found for this exercise- to be followed by the assessment of if the objects are 'incidental'

A definition that the government refuses to quantify.

Weeks of work before investigating who the various rights holders are and seeking clearance.

Who pays? Where is the money coming from.

We are frequently told that Britain is behind its competitors in productivity. If business is made to undertake such divisive and unnecessary work, setting one set of creative against another, real productivity and creativity will show further decline.

There are over 7,500 photography businesses in the UK, employing over 22,000 people.

It is already an industry under threat from smart phone images taken by the public. The inclusion of 2D images and the short transitional period in the repeal of section 52 will compound an already declining share of the overall economy from the photo industry.

For photographers their archive has been a reasonable contribution to their pension and their income.

Now their archive is being rendered toxic, it will be a liability. They will cease to be tax payers and be in need of benefits.

There are only losers in this project.



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