

From: [Tim Imrie](#)
To: [Section52CDPA](#)
Subject: Repeal of Section 52
Date: 16 December 2015 15:47:40

Dear Sir/Madam,

I am writing to argue the case against the Repeal of Section 52.

I have worked as a professional photographer in the field of Interior Design for approximately 30 years and my clients have included Design Groups, Advertising Agencies, Magazine and Book Publishers as well as individual furniture designers, interior designers and product designers.

As matters stand at the moment, the repeal of Section 52 without exceptions and safeguards being made would have an enormous number of unintended consequences. It would, for example, make the photographing or filming of any interior, domestic or otherwise, even with the owners' permission, virtually impossible, since a separate written permission would have to be sought for the inclusion in the image or film footage of every piece of furniture, every stitch of fabric, every item of crockery from whomever held the copyright. For one magazine article about a single house, this could run into well over a hundred separate permissions. The time and cost of doing so would be prohibitive.

The result would be that photographers or film and TV companies specialising in this area would cease trading, picture libraries would close down, a whole industry would go out of business.

This cannot have been the intention behind the idea of repealing Section 52, but it will be the consequence. It would also disadvantage the very designers, crafts people and artists the change in the law is intended to protect, as often the sale of, say, a chair increases when it has been featured even peripherally in a magazine article or TV programme. These media do act as useful free advertising platforms as well as an important source of information.

At the very least, the repeal of Section 52 should exclude the editorial use of 2D images showing 3D objects, and create an exception that permits the owners of properties to allow their depiction either in print, on the internet or on film, without seeking further permissions for the contents, provided that they own them.

It would also seem appropriate to consult further with the industries and people whose livelihoods will be badly affected by these proposals.

Yours sincerely,

T Imrie