

**From:** [Martin Woodhead](#)  
**To:** [Section52CDPA](#)  
**Subject:** Repeal of Section 52 CDPA  
**Date:** 01 December 2015 20:12:02

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Dear Sirs

I wish to make the following representation about the proposed change in copyright legislation concerning Section 52 of the CDPA.

The government initially led publishers to believe they would have a period of five years to transition, giving time to deplete stocks with limited adverse financial impact, and to take into account the extra cost and administrative burden of clearing additional permissions when planning new books. With this more reasonable transition period, it seemed the government had recognised that a retroactively-applied law would cause severe practical difficulties that could not be resolved in the short-term. Recently the government has had the original transitional period challenged and has issued a new proposal to reduce the transition period from five years to six months. This is financially untenable and reflects an alarming lack of understanding as to how the publishing industry operates.

Yours faithfully

Martin Woodhead  
Chairman  
Burleigh Dodds Science Publishing Limited