

From: [james.smith](#)
To: [Section52CDPA](#)
Subject: objection to proposed changes to copyright legislation
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I write from the offices of an independent British art publisher.

For 50 years we have been a leading specialist publisher in the fields of art and antiques.
<http://www.antiquecollectorsclub.com/uk>

The proposed changes to copyright legislation endanger our business on many levels.

They are fundamentally damaging to our established business with huge implications for books we have already published and books we might hope to publish in the future.

The cost of producing most art books is already excessively high. Margins are far smaller than in other fields of publishing. The likelihood of further costs can only mean less books will be published with the subsequent result of less scholarship and harm to education.

This legislation is aimed at protecting designers, but the negative impact on publishers will actually result in damage to designers, their reputations and earning potential. Designers are often big beneficiaries of their work being published in books. If this is curtailed then they will suffer.

In the immediate term what is most concerning is the proposal for a 'consultation' period of only 6 months. Art books take several years to produce. We have books in production that will immediately fall foul of the law upon publication. Furthermore we have stock of older books that will take considerable time to be sold. We may find ourselves in a position of having to destroy huge amounts of valuable stock in order to comply with proposed changes in the law (or we risk opening ourselves up to claims against us).

From the point of view of an art publisher these proposed changes appear ill thought out and badly informed.

As a final point, we are studying proposals for books that we will now simply drop because of uncertainty relating to this matter.

James Smith

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