

From: [Niall Mansfield](#)
To: [Section52CDPA](#)
Subject: Repeal of Section 52, CDPA
Date: 08 December 2015 11:06:04

We object to the proposed changes.

As publishers, the proposed changes impose huge overhead costs on us without any benefits.

As a small publisher we often have to print 3-5 years worth of stock to make a specialist title viable. If we now have only a six month transition period, then:

- a. we have to review all 300 of our titles in print to see whether they are affected or not. As we are a company of only 4 people, this is a huge load and a huge cost, and realistically is impossible for us to do.
- b. If any titles are affected, we could have up to about 4 years of stock that will have to be destroyed, and either permissions for everything sought (slow, resource intensive), or the book edited, re-proofed, re-printed, and re-distributed. As a small publisher we just cannot afford this.

We are a viable business and don't get any grants or external support, but the financial margins we operate are small. If you suddenly impose large overhead costs and labour loads on us, we will not be able to bear them.

My understanding is that the aim of the change is to protect designs, and that primary aim is fine, but the unintended consequences on publishers and museums and educators are terrible. The ideal is for the law to be worded so that it addresses what it needs to but excludes these side-effects. Failing that, a poor second, but one that at least allows us to survive, is to extend the transition period to give years, which will give us a chance to make changes as part of our gradual reprint process which would greatly reduce the cost.

Rgds,
Niall

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