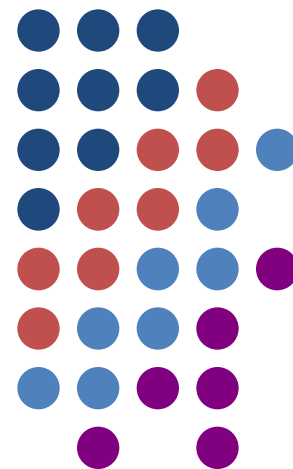


An introduction to Collective Rights Management in the UK

WIPO – British Copyright Council
Training Course 2019

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General topics



- Collecting Societies – their purpose and their role.
- How should they be managed?
- Development of Statutory Regulation UK and EU.
- Regulation and Codes of Conduct
- UK Collective Management Organisations
- Extended Collective Licensing
- Orphan works
- Rights Managed and interrelationships

Collecting Societies

What are they?



- Article 1(4) EC Cable and Satellite Directive - 93/83/EC.
- Any organisation which manages or administers copyright or rights related to copyright as its sole purpose or one of its main purposes.
- Now more complex:-
- Article 3 Directive 2014/26/EU on **collective management** of copyright and related rights and multi-territorial licensing of rights in musical works for online use in the internal market.
- “**collective management organisation**” means any organisation which is authorised by law or by way of assignment, licence or other contractual arrangement to manage copyright or rights related to copyright on behalf of more than one right holder, for the collective benefit of those right holders, as its sole or main purpose and which fulfils one or both of the following criteria
 - (i) owned or controlled by its members
 - (ii) it is organised on a not-for-profit basis.

WIPO Good Practice Toolkit for Collective Management Organisations



- The WIPO Good Practice Toolkit for Collective Management Organisations (CMOs) brings together examples of legislation, regulation and codes of conduct in the area of collective management from around the world.
- https://www.wipo.int/edocs/pubdocs/en/wipo_pub_cr_cmotoolkit.pdf
- The Toolkit is a working document that will continue to be improved. Member states and other stakeholders may use relevant parts of the document to help them design and approach suitable for their own particular context.
- However, the principles behind the EU Directive are good standards to consider and provide helpful examples alongside initiatives taken by WIPO members around the world.



What is their purpose?

- A not for profit body
- To help rights owners
- License rights collectively
- In a fair, clear and transparent way
- When individual rights owners cannot
 - Practically
 - Economically
 - Efficiently license the rights without help.

Wider aims and application



- Promoters of the diversity of cultural expression, both by enabling the smallest and less popular repertoires to access the market.(EU)
- Proving social, cultural and educational services for the benefit of right holders' and the public.(EU)
- Collective administration for rights which are difficult for owners to exercise effectively by themselves. (China)
- Protection of authors and holders of related rights, both national and foreign. (Mexico)

Roles of Collecting Societies



- To address specific statutory requirements.
- Where laws provide that rights may only be asserted via a collecting society.
- Voluntary/contractual collective management to reflect practicalities and market efficiencies.
- A two way dialogue – right holder and user/licensee practicalities

European Commission and Collecting Societies



- Provision is made for collective management in a number of existing Directives. **Directive 2014/26/EC** on collective management of rights concentrates upon improving transparency of governance and financial operation of collecting societies.
- Article 4(3) and (4) Rental Directive 92/100
Rights of authors and performers to receive equitable remuneration for rental.
- Links with WIPO Performances and Phonograms Treaty 1996.

Moves to increased statutory regulation as EU Directive was debated



- EU Member States were required to implement the provisions of Directive 2014/26/EU (the CRM Directive) by 10 April 2016.
- Within the UK initial steps were made.
 - The Copyright (Regulation of Relevant Licensing Bodies) Regulations 2014 (S.I. No 898) were implemented from 6 April 2014
 - The Copyright and Rights in Performances (Extended Collective Licensing) Regulations 2014 (S.I. No 2588) were implemented from 1 October 2014.

The Collective Management of Copyright (EU Directive) Regulations 2016



- Provisions of Directive 2014/26/EU were transposed into laws applicable within the United Kingdom by S.I. 2016 No. 221.
- The Collective Management of Copyright (EU Directive) Regulations 2016.
- Regular dialogue with stakeholders took place between the IPO and CMO and rights holder representatives during the transposition process.
- Guidance on interpretation to address practicalities was very important.
- Guidance on implementing the Regulations was first issued in February 2016
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/518555/Guidance_on_CRM_Directive_implementing_regulations.pdf

Directive 2014/26/EU on collective management of copyright and related rights and multi-territorial licensing of rights in musical works for online uses in the internal market



- Move from “collecting societies” to address “collective management organisations”.
- An organisation authorised by law or by way of
 - assignment
 - licence
 - or any other contractual arrangement
- To manage copyright or rights related to copyright
- On behalf of more than one right holder
- For the collective benefit of these right holders
- As its sole or main purpose
- And which fulfils one or more/at least one of the specified criteria.

Criteria for Management of Collective Management Organisations



- It is owned or controlled by its members
- It is organised on a not-for-profit basis.
- Regulation 2 in the CMO Regulations virtually transposes the definition of CMO from the Directive:
- **“collective management organisation”** means an organisation which
- (a) is authorised by law or by way of assignment, licence or any other contractual arrangement to manage copyright or rights related to copyright on behalf of more than one right holder, **for the collective benefit of those right holders, as its sole of main purpose;** and
- (b) is either owned or controlled by its members or is organised on a not for profit basis, or both.

Independent Management Entities



- Recognised under the Directive and the UK Regulations.
- An organisation which, as its sole or main purpose
 - is authorised by law or by way of assignment, licence or any other contractual arrangement to manage copyright or rights related to copyright on behalf of more than one right holder, for the collective benefit of those right holders
 - is **neither owned nor controlled, directly or indirectly, wholly or in part**, by right holders; and
 - is organised on a not for profit basis.

Only some obligations in the Directive apply to IME's



- Some obligations in the Directive which relate to dealings with licensees, as well as some information and transparency obligations, also apply to IMEs. In their entirety, those obligations are reflected in the UK transposition Regulations as follows:
 - paragraph (1) of regulation 15 (licensing);
 - regulation 17 (information to be provided to right holders);
 - paragraph (1)(b) of regulation 19 (information to be provided on request); and
 - paragraph (2) of regulation 20 (disclosure of information to the public).

Directive 2014/26/EU – Interrelationship between Right Holders – CMOs and Membership of CMOs



- “Rightholder” means any person or entity, **other than a collective management organisation**, that holds a copyright or related right or who, under an agreement for the exploitation of rights, is entitled to a share of the rights revenue.
- Requirement for right holders to be “natural” persons or “legal” entities dropped from final wording.



Members of CMOs

- The Directive defines “Member” as
- a right holder; or
- an entity representing right holders, including other collective management organisations and associations of right holders;
- fulfilling the membership requirements of the collective management organisation and admitted by it.



Value chains and CMOs

- The Directive aims to ensure the right level of transparency for CMOs acting on behalf of members.
- Within the UK transparency and efficiency have to be addressed when looking at the way rights holders may allow for the delegation on mandates from one CMO to another more specialist CMO for specific areas of licensing.

Directive 2014/26/EU– Article 5.2



- Rightholders shall have the right to authorise a collective management organisation of their choice.
- To manage the rights, categories of rights or types of works and other subject matter of their choice.
- For the **territories of their choice**, irrespective of the Member State of **nationality**, residence or of establishment of either the collective management organisation or the rightholder.

Directive 2014/26/EU- Definitions



- Distinguishing “members” from “CMOs”.
- “member (of a **collective management organisation**)” means a rightholder or an entity directly representing right holders, including other **collective management organisations** and associations of rightholders, fulfilling the membership requirements of the **collective management organisation and admitted by it**.
- “representation agreement” means any agreement between **collective management organisation** whereby one **collective management organisation** mandates another to represent the rights it represents”(including agreements for multi-territorial licensing of on-line rights in musical works)

Copyright Licences and UK Regulation



- S 116(3) CDPA 1988.
- “Copyright licences” means licences to do, or authorise the doing of, any acts restricted by copyright.
- CDPA 1988 provides a regulatory framework for the operation of licensing schemes and licensing bodies for certain activities.
- From 10 April 2016 – S.I. 2016 No.221 - The Collective Management of Copyright (EU Directive) Regulations 2016 have applied.

Licensing Bodies and what they do.



- S 116 (2) Copyright, Designs and Patents Act 1988
- “licensing body” means a society or other organisation which has as its main object, or one of its main objects
 - the negotiation or granting (of copyright licences)
 - either as the owner or prospective owner of copyright or as agent for him
 - and whose objects include the granting of licences covering works of more than one author.

Copyright Licences and UK Regulation - BREXIT



- The 2016 Collective Management Regulations provide a good basis for the operation of Collective Management Organisations.
- UK has said that post BREXIT provisions which do not have cross-border application will be maintained.
- Questions of reciprocity will be asked.

UK – if no longer and EU Member State



- Preparations have been made to continue to apply EU Copyright Directive acquis rules as previously adopted and transposed into UK law.
- Some cross border EU Regulations will be revoked (at least pending resolution of a future trade deal). E.g. The Portability of Online Content Services Regulations.
- Rules in place to apply on BREXIT exit day.

UK Regulations applied on EU BREXIT day



- S.I. 2019 No.605 – The Intellectual Property (Copyright and Related Rights) (Amendment) (EU Exit) Regulations 2019
- S.I. 2019 No 265 – The Intellectual Property (Exhaustion of Rights) (EU Exit) Regulations 2019

have been passed and will come into force on exit day.

Regional rules with international implications



- The UK Regulations aim to ensure that, generally, copyright laws applied in the UK on exit day which are based upon EU laws, will be treated as “retained EU law” after exit day.
- In other words the same rules will apply in the UK on exit day unless specific changes are applied.
- Regional exhaustion rules will continue to be recognised in the UK. But reciprocity if “no deal”?

Reciprocity implications of BREXIT



- Part 3 of the 2016 Regulations apply to Multi-territorial Licensing and Collective Management Organisations.
- The regionally agreed EU rules cannot extend to the UK after the UK leaves the EU without further agreement.
- The Part 3 provisions (concerning multi-territorial licensing) as included in the 2016 Regulations will apply against Part 1 of the Competition Act 1998 within the UK (rather than under Articles 101 and 102 of the Treaty on the Functioning of the European Union).

Implications of BREXIT and WIPO Toolkit



- If regionally applied rules break up, questions have to be asked over the effect on competition between CMOs which find themselves operating in new separate marketplaces.
- Breakdown of regional rules put greater focus on the importance of Internationally agreed frameworks to maintain standards.
- The guidance and assistance provided by initiatives such as the WIPO Good Practice Toolkit for Collective Management Organisations.
- <http://www.wipo.int/copyright/en/management/#cmotoolkit>

Overseeing Licensing Bodies in the UK



- The Copyright Tribunal oversees proper function of licensing schemes and the activities of licensing bodies generally.
- S 117 – licensing scheme relating to
 - copying
 - rental or lending of copies to the public
 - performing, showing, or playing the work in public
 - communicating the work to the public.

But how should CMOs be run in general?



- Recital 45 – The transparency of the conditions under which **collective management organisations** manage online rights is of particular importance **to members of collective management organisations**.
- CMO's should therefore provide sufficient information to their **members** on the main terms of any agreement mandating any other **collective management organisation** to represent **these members'** online **music** rights for the purposes of multi-territorial licensing.
- Development of Codes of Practice and reporting on adherence to their terms was a central part of UK CMO operations in the lead up to introduction of the 2016 Regulations.

Pressure for Regulation and Codes of Conduct preceded the Directive



- to provide a template for codes of practice for individual collective management organisations which will:
- summarise a collective management organisation's governance structure, licensing arrangements, royalty collection and distribution practices, administration charges;
- clarify service levels for members and licensees;
- set out requirements for rates to be fair and consistent across all users;
- provide for transparency in terms of access to licence tariffs;
- explain the implications of a member's mandate to a collective management organisation;
- clarify complaints/disputes procedures for members and licensees.

Codes of Practice to apply to operation of CMOs



Codes of Practice should evolve and reflect best practice with the support of both right holders and licensees. Laws can help to shape development.

Minimum Standards for UK Collecting Societies were published in November 2012

<http://webarchive.nationalarchives.gov.uk/20140603093549/http://www.ipo.gov.uk/hargreaves-minimumstandards.pdf>

They added to Principles of Good Practice developed by the British Copyright Council to promote Voluntary good governance

<http://www.britishcopyright.org/page/36/principles-of-good-practice-for-cmos/>

“Voluntary” Minimum Standards were then “underpinned” by S.I. 2014 no 898 – The Copyright (Regulation of Relevant Licensing Bodies) Regulations 2014 before introduction of the 2016 Regulations <http://www.legislation.gov.uk/uksi/2014/898/contents/made>

Voluntary solutions led the way



- “Voluntary” Minimum Standards applied to:-
 - Membership
 - Representation
 - Obligations to licensees and potential licensees
 - Conduct of employees, agents and representatives
 - Information and transparency
 - Reporting Requirements
 - Complaints handling.

Minimum Standards supported Codes



- Codes included complaints resolution provisions – using single ombudsman
- Codes provided for an independent code reviewer to monitor and review performance of collecting societies against the minimum standards
- Additional minimum standards were flagged as necessary to support any Extended Collective Licensing.

Lessons from application of the 2016 Regulations



- Importance of dialogue with stakeholders.
- Allow for evolution of Guidelines as practical issues arise.
- Development of agreed procedures for audit provisions under the Regulations to assist auditors working with CMOs.
- Considering how the Regulations apply against wider company law and tax obligations relevant to CMO activities?



UK Collecting Societies

- Representatives from most of the major UK collecting societies will give presentations during the Course.
- Licensing
- Provision of equitable remuneration
- Operating bilateral agreements
- Facilitating the collection of statutory payments.

Literary and Dramatic Works



- ALCS – Authors Licensing and Collecting Society
- CLA – Copyright Licensing Agency
- PLS – Publishers’ Licensing Services
- NLA – NLA Media Access

Musical works – Music and Lyrics



- PRS for music
- Performing Right Society (PRS)
- Mechanical Copyright Protection Society (MCPS) (originally Mechanical Copyright Licences Company Limited – Mecolico)
- PRS administer non-dramatic performing rights in musical works

<http://www.prsformusic.com/SiteCollectionDocuments/Membership/PRSforMusicUniverse.pdf>

Music



- PMLL – Printed Music Licensing Limited
- Set up in 2013 to manage the licensing of the copying of printed music in the UK on behalf of music publishers.
- Its Schools Printed Music Licence (SPML) covers the copying of printed sheet music in schools and is offered to schools exclusively by the CLA acting as sole agent.

Artistic Works



- Design and Artists Copyright Society (DACCS)
- Artists Collecting Society (ACS) – Artists Resale Right
- Picture Industry Collecting Society for Effective Licensing – (PICSEL) – new CMO launched after introduction of the CMO Regulations.

Sound Recordings



- PPL (Phonographic Performance Limited)
- BPI (British Recorded Music Industry) Limited

- Production music – PRS for Music

Films



- FOCAL International Limited
- AGICOA – Association De Gestion Internationale Collective Des Oeuvres Audiovisuelles
(agencies) Compact Collections Limited
- Directors UK Limited
- Video Performance Limited (VPL)



Broadcasts

- Educational Recording Agency Limited (ERA)

Agencies :- Compact Collections Limited
560 Media Rights Limited

Performers



- Equity
- Musicians' Union
- PPL
- British Equity Collecting Society (BECS)
- Incorporated Society of Musicians
- Collecting societies administering payments as equitable remuneration -v- application of collective bargaining agreements.

Purposes



- Licensing and administering rights that individual rights owners cannot economically or practically do for themselves.
- Facilitating access and enabling users to comply with legal requirements for the use of copyright works.

Style for launch of a new CMO



- PICSEL launched under the auspices of the new UK Collective Rights Management Regulations, which came into effect on 10th April 2016.
- Stated aim to be equitable, accountable and transparent as a collecting society for visual works.
- To provide a central point for members to get more actively involved in the governance of the organisation and the licensing programmes made available by organisations such as the CLA, ERA and NLA, as well as others.

New interrelationships for CMOs?



- PICSEL is a 'new' collecting society responsible for collecting monies made from reprographic and secondary digital copying. Its main source of income will be received from the UK Copyright Licensing Agency (CLA) for onward distribution to visual arts rights holders based on an agreed distribution policy by its members.
- PICSEL purports to offer *an alternative choice for visual rights holders who license their content for primary uses* to UK book and magazine publishers as well as TV broadcasters.
- The launch perhaps signifies the increasing important of understanding the way in which the work of one CMO interrelates to the work of others?

Exclusive and Non-exclusive Rights



- If collecting societies have a de facto monopoly position – what can be done to prevent abuse?
- UK provides for operation of the Copyright Tribunal
- Compare US – where competing organisations operate ASCAP, BMI and SESAC
- Benefits of collective licensing are not considered per se unlawful (*Broadcast Music Inc. v Columbia Broadcasting Sys., Inc.* 441 US 1, 201 U.S.P.Q. 497 (1979), 59

New boundaries and CMOs



- Extended Collective Licensing
- Identification and licensing of orphan works
- Licensing and blanket licensing when uses may in part be covered by application of an exception or limitation but, in practice, users want a blanket licence which covers all use.

Flexibility under EC law



- Recitals 17 and 18 EC Copyright Directive 2001/29/EC
 - 17 – It is necessary, especially in the light of the requirements arising out of the digital environment, to ensure that collecting societies achieve a higher level of rationalisation and transparency with regard to compliance with competition rules.
 - 18 – This Directive is without prejudice to the arrangements in the Member States concerning the management of rights such as extended collective licences.

Directive (EU) 2019/790 of 17 April 2019



- New Directive on copyright and related rights in the Digital Single Market.
- CMOs – new licensing opportunities.
- Article 5 – mandatory exception to support digital use for the sole purpose of illustration or teaching.
- Article 5.2 – qualification to permit Member States to provide the exception does not apply to the extent that suitable licences authorising the relevant acts and covering the needs and specificities of educational establishments are easily available on the market.

EU Directive 2019/790



● Article 8.1

- Member States shall provide that a collective management organisation, in accordance with its mandates from right holders, may conclude a non-exclusive licence for non-commercial purposes with a cultural heritage institution for the reproduction, distribution, communication to the public or making available to the public of out-of-commerce works or other subject matter that are permanently in the collection of the institution, **irrespective of whether all right holders covered by the licence have mandated the collective management organisation**, on the condition that
 - (a) the collective management organisation is, on the basis of its mandates, sufficiently representative of right holders in the relevant type of works or other subject matter and of the rights that are the subject of the licence; and
 - (b) all right holders are guaranteed equal treatment in relation to the terms of the licence.

Extended Collective Licences

– new statutory provisions



- Driven by need for licences for use of literary and musical works in radio and television broadcasts.
- First ECL established in Denmark, Finland, Iceland, Norway and Sweden in the 1960's.
- Suggested as a solution for the licensing of orphan works within the United Kingdom but ECL and orphan works licensing have now been approached separately in Regulatory terms.
- UK provisions for application provided for within the Enterprise and Regulatory Reform Act 2013 – Part 6 s 77 amending s 116 Copyright, Designs and Patent Act 1988 .
- S.I. 2014 No 2588 The Copyright and Rights in Performances (Extended Collective Licensing) Regulations 2014 were implemented from 1 October 2014.

S.I. 2014 No 2588 – The Copyright and Rights in Performances (Extended Collective Licensing) Regulations 2014



- “Extended Collective Licensing Scheme” means a collective licensing scheme under which a relevant licensing body may grant licences in accordance with an authorisation (pursuant to the Regulations) in respect of relevant works
 - (a) in which the copyright is owned by non-member right holders; or
 - (b) in relation to which the restricted acts in relation to the performance may be permitted or prohibited by non-member right holders.
- “Relevant Work” means a work which is protected by copyright or a performance in respect of which certain acts constitute restricted acts.
- Reference to a “relevant work” includes a reference to a work or performance, which itself falls within the definition of “relevant work” and is embedded or incorporated in, or constitutes an integral part of, another relevant work.

Extended Collective Licences



- Opt-out arrangements must be in place to enable right holders to limit or exclude the grant of licences under Extended Collective Licensing Schemes.
- Secretary of State must provide authorisation to operate any Extended Collective Licensing Scheme (for up to 5 years and renew authorisation with effect from the end of any initial authorisation period).
- Authorisation subject to the licensing body ensuring that its Code of Practice is consistent in terms of application of criteria to non-member right holders and it is complying in all material respects with the terms of its Code of Practice.

EC Directive 2019/790



- Article 12
- Collective Licensing with an extended effect.
- Supports collective management organisations are subject to the national rules implementing Directive 2014/26/EU (on collective licensing) undertaking licensing with extended effect.
- How will rights/representation and contract terms in Representation Agreements evolve?

Collecting Societies and Orphan Works



- In practice, many collecting societies collect payments due to rights owners whose whereabouts may not be known at the time a licence is granted.
- Extended Collective Licensing arrangements are recognised in Nordic countries and may now be relevant for licensing schemes recognised as a result of application of Article 12 of the new EC Copyright Directive.

Orphan Works



- A work shall be considered an orphan work if the rightholder in the work is not identified or, even if identified, is not located after diligent search for the rightholder has been carried out and recorded.
- CMOs will have an important role within diligent search processes.
- 2012/28/EU – Orphan Works
<http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:299:0005:0012:EN:PDF>
- Directive was implemented into UK law under
 - The Copyright and Rights in Performances (Certain Permitted Uses of Orphan Works) Regulations 2014 to be implemented from 29 October 2014
 - <http://www.legislation.gov.uk/ukdsi/2014/9780111117682>
 - Cross border application of nationally applied orphan works licences has been an issue in the BREXIT process. UK only scheme now to apply.

CMOs and Limitations and Exceptions



- Practical licensing solutions when uses cannot take place without infringing the Three Step Test
- Allocation and distribution of equitable remuneration
- Fair compensation to rights owners

Collective Management and Limitations and Exceptions



- WIPO Copyright Treaty 1996
- Article 10
- Limitations and Exceptions
 - (1) Contracting parties may, in their national legislation, provide for limitation of or exceptions to the rights granted to authors of literary and artistic works under this Treaty in certain special cases that do not conflict with the normal exploitation of the work and do not unreasonably prejudice the legitimate interests of the author.
 - (2) Contracting Parties shall, when applying the Berne Convention, confine any limitations of or exceptions to rights provided for therein to certain special cases that do not conflict with a normal exploitation of the work and do not unreasonably prejudice the legitimate interests of the author.

The Three Step Test



Article 13 TRIPS (Agreement on Trade-related aspects of Intellectual Property Rights).

Members shall confine limitations and exceptions to exclusive rights to certain special cases which do not conflict with a normal exploitation of the work and do not unreasonably prejudice the legitimate interests of the right holder.

Article 9 Berne Convention for the Protection of Literary and Artistic Works
1971/1979

(1) Authors of literary and artistic works protected by this Convention shall have the exclusive right of authorising the reproduction of these works, in any manner or form.

(2) It shall be a matter for legislation in the countries of the Union to permit the reproduction of such works in certain special cases, provided that such reproduction does not conflict with a normal exploitation of the work, and does not unreasonably prejudice the legitimate interests of the author.

and again...



Article 5.5 Directive 2001/29/EC (on the harmonisation of certain aspects of copyright and related rights in the information society).

The exceptions and limitations provided for in paragraphs 1,2,3 and 4 shall only be applied in certain special cases which do not conflict with a normal exploitation of the work or other subject-matter and do not unreasonably prejudice the legitimate interests of the right holder.

In this context the caveats for licensing recognised in provisions such as Article 4.2 of the currently debated proposals for a new EU Copyright Directive, are important.

Future and new boundaries for CMOs



- The new opportunities touched upon must complement the contractual assertion of rights by owners of copyright.
- Services must be seen to be efficient and useful.

Transparency



- Transparency in licensing will be a theme of presentations over the Course.
- However users also want clarity, reassurance and certainty from licence terms.
- Is there an inherent conflict in these aims which must be considered in the wider WIPO debate about the future application of copyright exceptions and limitations?

Collective Management



- Working for rightholders to administer rights in cases where it is economically or otherwise practically difficult for individual owners to monitor and administer rights themselves.
- No recipe for creative growth if rightholders are denied an opportunity to secure compensation for use of their work by others whenever it is not practical for an owner to license rights themselves.

Role for Collecting Societies



- Transparent
- Accountable
- Effective
- Responsible
- Answerable to complaints and disputes raised.

Application of the CRM Directive is an important example.

Recital 10 provides

“Nothing in the Directive should preclude a Member State from applying the same or similar provisions to collective management organisations which are established outside the Union but which operate in that Member State”.

Practicalities



Reporting and transparency requirements must recognise practical difficulties faced by CMOs such as securing use data from licensees.

In practice it is important that CMO Regulations do not impose burdens on CMOs which disregard application of other areas of law relevant to the operation of companies (and the protections that this already affords under national legislation).

Flexibility in application of the Directive in terms of application at national level has been important to recognise the range of rights and sizes of repertoire represented by CMOs.

Some UK CMOs are “SME’s” – Small and Medium Sized Enterprises employing less than 10 people.

Thank you



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