Submission to the Productivity Commission: *Harnessing Data and Digital Technology – Interim Report*

1.0 About the Australian Publishers Association

The Australian Publishers Association (APA) welcomes the opportunity to respond to the Productivity Commission's interim report. Publishing is both a cultural and an economic engine. The sector generates more than $2 billion annually, sustains thousands of jobs across the creative and knowledge industries, and contributes directly to literacy, culture, education, and research.

Each year, publishers release over 20,000 new Australian books alongside thousands of scholarly and educational works. Further, Australian publishers keep more than 1.8million titles commercially available in the local market. Together, these outputs form a diverse and continually refreshed corpus of information and ideas that underpins Australia's knowledge economy and cultural identity.

This corpus is also of immense value to emerging technologies, such as Artificial Intelligence (AI), which depend on high-quality, curated datasets to train and operate effectively. What publishers produce is not only the foundation of AI innovation but also a public good: trusted, diverse, and authoritative content that enriches schools, universities, libraries, and the broader community.

2.0 Executive Summary and Recommendations

Artificial Intelligence (AI) offers genuine opportunities to boost productivity and enrich Australian life, and publishers recognise these possibilities. Yet its value depends on access to high-quality information created by others.

AI relies on probabilistic patterns rather than evidence-based logic, which limits its ability to produce reliable information and amplifies risks to quality and accuracy. **As a result,** these risks go far beyond technical errors, threatening creative industries, cultural rights, human dignity, and public trust.

AI should therefore be adopted cautiously, with **robust legal and ethical safeguards** to protect both information integrity and the communities it serves.

This submission focuses on two core issues:

1. The Centrality of Copyright and Licensing

Copyright is not a barrier to AI—it is the foundation that sustains investment in Australian stories, learning resources, and research outputs– the very material that AI requires to be functional. Licensing markets, built on this framework, already exist and are expanding. Direct agreements between publishers and AI developers are emerging, and collective licences are in place across schools, universities, and government. These mechanisms are tested, flexible, and scalable. They have extended quickly to AI, providing developers with legal certainty while ensuring fair returns to creators.

By contrast, a text and data mining (TDM) exception would dismantle these licensing markets just as they take shape. It would legalise uncompensated scraping, strip rightsholders of control, and shift value to global technology firms at the expense of Australian creators.

Such an exception would likely place Australia in breach of its Berne and TRIPS obligations and undermine our credibility as a cultural and trading nation. The Commission's interim report does not justify such a radical change: its claims rest on thin evidence and speculative economic modelling, while failing to account for the fact that any profits are likely to flow offshore.

2. The Prudence of Guardrails

AI also raises risks to trust, transparency, and cultural sovereignty. Without visibility into training data and provenance, researchers and educators cannot assess accuracy or integrity. Indigenous Cultural and Intellectual Property (ICIP) faces particular risks of appropriation or distortion without consent. AI also magnifies misinformation and bias, threatening public trust. These risks demand guardrails that complement copyright, including:

- **Training-data transparency and provenance logs** with confidentiality protections.
- **ICIP protocols** that embed consent, community governance, and fair benefit-sharing.
- **Swift, low-cost enforcement pathways** to resolve disputes fairly.

2.1 Recommendations

1. **Retain the current copyright framework (Option 1):** Australia's copyright law is fit for purpose and remains the foundation for cultural and knowledge investment.
2. **Support licensing pathways (Option 2):** Position Australia as a licensing-first jurisdiction for AI, reinforcing that innovation must proceed on voluntary licensed terms, supported by transparency rules, provenance logging, and accessible dispute resolution.
3. **Reject a TDM exception (as described in Option 3):** Such a change would collapse emerging licensing markets, strip rightsholders of control, and hand vast uncompensated datasets to global technology companies.
4. **Implement guardrails:** Ensure transparency, protect ICIP, and sustain trust through enforceable safeguards.

3.0 Response to TDM Exceptions and the Case for Licensing

3.1 The Commission's Options—What follows from each option

The Productivity Commission outlines three possible approaches, but only a licensing-first pathway delivers innovation alongside sustainability, while the other options undermine emerging markets.

- **Option 1 – Retain current law.** Under the existing framework, the copying inherent in AI training requires permission. This position is well established in both legal doctrine and commercial practice. It provides clarity, upholds Australia's international obligations, and ensures that investment in new works remains viable.
- **Option 2 – Support licensing.** This option complements the status quo by making transactions smoother and more transparent. Licensing can be strengthened through standardised terms where helpful, collective solutions to deliver scale, and modest regulatory supports such as dataset transparency and provenance logs. This is the consistent, workable pathway.

- **Option 3 – Introduce a TDM exception.** A broad exception would short-circuit both Options 1 and 2, collapsing licensing markets just as they are beginning to grow. It would shift costs from platforms onto rightsholders, forcing creators to opt-out and litigate where possible. Such a move would undermine Australia's copyright framework and expose the sector (and the nation) to significant cultural and economic harm.

The Commission's Contradictory Stance on Regulation. The report describes AI as a "groundbreaking" technology akin to the "steam engine [...] in the 1800s" and predicts it will transform productivity and society. Yet, despite this framing, the Commission calls for a pause on new regulatory measures while simultaneously singling out copyright for immediate change. This inconsistency undermines the PC's own stated principle that existing frameworks should be adapted before introducing technology-specific carve-outs. A licensing-first approach—anchored in copyright, licensing, and enforcement—is the consistent and credible path, ensuring that innovation is supported without discarding the foundations of Australia's creative economy.

3.2 Misrepresentation of TDM Exceptions in the Interim Report

The APA is concerned that the Commission's treatment of text and data mining (TDM) is partial, inconsistent, and, in places, misleading. The interim report (in numerous places) frames copyright as a "clarity" problem for AI developers, rather than acknowledging the real issue: widespread unlicensed copying of protected works. It fails to situate TDM within the international copyright framework, understates the risks for creative industries, and overstates the policy case for change.

This section highlights the key areas where the Commission's account of TDM exceptions is inadequate and risks steering Australia down a damaging path:

- **Misdiagnosis of the Problem**: The report frames copyright as an obstacle to AI innovation, rather than recognising that the central issue is mass scraping without consent. This is an enforcement and licensing challenge, not a legislative gap.
- **Selective use of International Examples**: The interim report presents TDM exceptions as workable models, yet it **overlooks operational problems**, including burdensome opt-outs, lawful access tests, litigation, and the fact that most frameworks **were not designed with generative AI in mind**.
    - **EU:** Commercial TDM requires **lawful access** and **opt-outs**. In practice, this has proven **operationally messy**, and the opt-out process is **burdensome and inconsistent**.
    - **UK:** The government **withdrew plans** for a broad commercial TDM exception after sector analysis. At the same time, **collective licensing frameworks** for generative AI are now being developed.
    - **US:** The scope of **"fair use"** for AI training remains **unsettled**. Roughly **50 active lawsuits** indicate high legal uncertainty rather than a clear green light.
    - **Singapore:** Commercial TDM is allowed but subject to strict conditions:
    - **Japan:** TDM exceptions permit broad copying for data analysis but require:
        - **Lawful access** to the material being copied.
        - No **unreasonable prejudice** to rightsholders.

          While broad on paper, this framework was **not designed for foundation models**, and its application to **commercial generative AI remains contested**.
    - **Canada:** Expanding education fair dealing in 2012 led to an **80% collapse in licensing revenue**. Publishers withdrew from the market, **reducing local content diversity and long-term investment**.

The global lesson is that **broad exceptions** create more problems than they solve; **licensing** produces legally certain, higher-quality outcomes.

- **Treaty risks downplayed**: The Berne/TRIPS three-step test is absent from the analysis. A broad commercial TDM exception would struggle to qualify as "special", would conflict with normal licensing exploitation, and would unreasonably prejudice rightsholders.
- **Licensing markets minimised**: The report suggests licensing is problematic [p.25], overlooking evidence of live deals in the UK, US, and STM sectors, and ignoring Australia's own history of direct and collective licensing success.
- **Jurisdictional sleight of hand**: The report acknowledges Australian copyright only applies domestically, yet implies a local TDM exception would affect global AI training—an illogical conclusion.

3.3 The Impact of TDM Exceptions on Investment in new Publishing and in Information Services

Text and Data Mining (TDM) exceptions would have far-reaching consequences for both the creation of new content and the commercial services that deliver structured, reliable information. By making large-scale copying free, these exceptions would undermine the business case for publishers and information providers who invest heavily in producing, organising, and maintaining high-quality datasets. The effects would not only damage cultural production but also destabilise the commercial services that make information useful to education, research, and innovation. Instead of encouraging innovation, **TDM exceptions would hollow out the very content and infrastructure on which AI depends**.

Impacts on investment in new content

- **Reduced incentives**: Without reliable licensing revenue, publishers will scale back investment in Australian stories, learning materials, and scholarly works. The importance of these stories—and the broader project of sustaining and sharing Australia's cultural voice—is a central priority of the **2023 National Cultural Policy, *Revive***. ***Revive*** highlights the vital role of telling Australian stories, and reaffirms the government's commitment to **copyright and the rights of creators** as foundations for a thriving, sustainable cultural sector.
- **Loss of diversity**: Smaller and independent publishers, already operating on tight margins, will exit the market, narrowing the range of voices and perspectives.
- **Decline in quality**: Editorial, peer review, and accessibility investments will be cut, as publishers are forced to reduce costs.
- **Cultural erosion**: Australian voices, particularly Indigenous and regional ones, risk being displaced by global AI-generated material.

Impacts on structured information services

- **Collapse of commercial models**: Services that supply curated corpora (journals, metadata, abstracts, reference works) rely on licensing revenue; TDM exceptions make these models unsustainable.
- **Loss of reliability**: Structured, standardised data—essential for science, education, and healthcare—would no longer be maintained to the same standards.
- **Market distortion**: Free access through exceptions advantages global AI firms at the expense of the local services that build and maintain structured knowledge.
- **Downstream risks**: Without trusted structured data, AI systems will train on unverified sources, increasing error rates, bias, and misinformation.

These risks are not hypothetical. Canada's 2012 education fair dealing expansion caused an **80% collapse in licensing revenue**, forcing publishers to withdraw from local content production **(see case study below)**. Medical datasets such as **PubMed** and **Cochrane** require constant maintenance; if mined freely, their accuracy would deteriorate, threatening public health research. In Australia, the emergence of the **News Media Bargaining Code** shows how free access to content by global platforms **undermines local information providers**. Without structured, licensed datasets, AI systems are trained on unverified sources, leading to **hallucinated legal cases, inaccurate medical advice, and unreliable educational content**.

3.4 Why Licensing is the Right Path for AI

Licensing is a long-established commercial practice that continually evolves to meet the demands of new technologies and markets. From the earliest book trade agreements through to the collective licences that underpin schools, universities, and businesses today, licensing has proven to be a flexible and durable framework for balancing access with fair (or market-based) remuneration.

Licensing has adapted seamlessly to new media formats—print, audio, digital, and online—and continues to provide certainty for both rightsholders and users. Extending licensing to AI is not a leap into the unknown but a logical continuation of a system that has supported creativity, commerce, and cultural participation for more than two centuries.

3.4.1 Licensing aligns incentives for creation and innovation

Publishing is high risk: most titles recoup modestly; best selling titles often fund the rest of a publishing list. **Licensing preserves the incentive** to invest in new authors, classroom tools, and scholarly resources. It also channels revenue to creators when their works are used to improve AI models and services. In short, licensing underwrites the **renewable supply of quality data** that the wider community and, more specifically, AI need. As the Canadian copyright experience demonstrates, when copyright protections are weakened and licensing pathways are undermined, publishers inevitably scale back investment in new local content, leading to fewer titles, reduced diversity, job losses, and a long-term erosion of the cultural and educational resources available to the community.

Case Study: Canada's Educational Fair Dealing Exception

The Canadian experience shows the real-world consequences of weakening copyright and undermining licensing. In 2012, Canada expanded "fair dealing" to cover education, effectively permitting large-scale uncompensated copying of textbooks and classroom resources. Within just a few years, revenues of the national licensing body collapsed by more than 80%, forcing widespread layoffs, cancelled investments, and the withdrawal of publishers from educational markets. The result was a sharp decline in the production of new Canadian content, reduced diversity of titles available to schools and universities, and long-term damage to the ecosystem that supports authors, editors, and educators. The lesson is clear: without robust copyright protection and workable licensing pathways, publishers cannot sustain investment in new local works.

3.4.2 Licensing is already happening—and can scale

Licensing is not speculative or theoretical—it is already functioning across multiple markets, and with existing infrastructure and emerging models, it can be scaled rapidly to meet the demands of AI.

a) Direct licences: AI developers are already licensing archives and datasets from news, STM, and trade publishers in the UK, US and to a lesser extent Australia. Far from being difficult, licensing of high-quality data is getting easier. STM and research publishers now manage vast, structured

datasets—journals, abstracts, metadata, images, and reference corpora—that are curated, standardised, and interoperable, making them far more commercially useful than the unstructured web (or content scraped from pirate libraries).

These repositories are already licensed at scale to libraries, universities, and research institutes under well-tested agreements, giving publishers deep expertise in managing data access. Increasingly, publishers are also providing APIs, secure enclaves, and compute-to-data solutions that let AI developers work with sensitive or premium content without compromising security or rights.

Direct licensing is particularly well suited to premium, curated, or domain-specific content such as curriculum-aligned learning resources, STM literature and metadata, validated reference works, and specialist archives. These agreements can flexibly cover a wide range of use cases—including pre-training, fine-tuning, retrieval-augmented generation (RAG), and evaluation or benchmarking—while clearly defining territory, duration, and scope (e.g., global or limited, fixed-term or model-specific).

Access can be delivered securely via APIs or compute-to-data arrangements, with strong governance measures like logging, hashing, watermarking, and retention rules (e.g., weights vs. raw data). Attribution requirements—citations, digital object identifiers (DOIs), and output labelling—further support provenance and trust.

> **Why developers like it:** better data yields better models; lower litigation risk; clearer audit trails; and value-added features (taxonomies, ontologies, controlled vocabularies) that accelerate product development.
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> **Why publishers like it:** predictable revenue; control over scope and sensitivity (e.g., Indigenous works); and opportunities for collaborative product innovation (e.g., education-safe modes, research-integrity tooling).
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> **What deals are being done:** In recent months, several major international publishers—**Wiley, Taylor & Francis, Johns Hopkins University Press, HarperCollins, Oxford University Press, Cambridge University Press, and Sage**—have announced direct licensing agreements allowing their non-fiction, scholarly and reference content to be used as training data for large language models (LLMs). These deals reflect how leading publishers are beginning to **grapple with their strategy amid ongoing legal and market uncertainty**, balancing near-term revenue opportunities against complex technical and governance challenges. Some publishers have released statements clarifying the contribution of AI deals to their bottom line.
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> To track this rapidly evolving space, **Ithaka S+R** has created a public **Generative AI Licensing Agreement Tracker** that records known deals by publisher, purchaser, deal type, and size. It also highlights emerging issues such as **pricing, author opt-outs, correction and retraction handling, and provenance tracking**—showing how legal, technical, and business questions are shaping this new market. *(See: Generative AI Licensing Agreement Tracker)*.

b) Collective licences: New collective models for generative AI are emerging in comparable markets, offering efficient, scalable access for developers.

When the goal is scale—thousands of rightsholders, millions of works, and large numbers of users—collective licensing is a proven tool. Australia's collecting societies already distribute hundreds of millions of dollars each year through well-tested rules on sampling, reporting, and collection management. Extending these systems to AI does not require invention from scratch: the familiar levers of collective licensing can be readily applied.

At its core, a collective licence for AI can provide blanket or sectoral coverage for clearly defined uses such as pre-training, fine-tuning, retrieval-augmented generation, or evaluation. Access would remain conditional on lawful use—developers would still need to hold or obtain a subscription, purchase, or licence to the underlying content, ensuring that existing markets are respected. Pricing could be tiered according to model class (content consumed, or output scope) and purpose (research versus commercial deployment), making the framework both flexible and fair.

Importantly, collective licensing can start quickly. Pilot schemes could cover a defined subset of works—for example, Australian trade publishing, educational materials, and STM metadata—focusing initially on fine-tuning and retrieval-augmented generation (RAG). Once reporting pipelines are tested and trust is built, the scheme could expand to pre-training and other applications.

> **Why developers like it:** Scalable access to large collections without negotiating thousands of individual contracts; predictable costs through tiered fees; clear lawful-access assurance that reduces legal risk; light-touch reporting rather than intrusive audits; and a framework that is interoperable with international licensing norms.
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> **Why publishers like it:** Efficient participation for thousands of rightsholders through one system; fair revenue distribution based on established collection and usage rules; protection of sensitive categories (e.g., Indigenous works, exam materials) through exclusions or specific terms; and the ability to start with a pilot licence that can grow in scope as reporting pipelines and trust mature.
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> **What collective licensing arrangements are emerging:** The APA refers to the Copyright Agency submission, but as we understand it alongside direct agreements, a new wave of **voluntary, opt-in collective licensing models** for AI training is beginning to emerge internationally. These licences are designed to give AI developers **lawful, scalable access** to large catalogues of books, learning resources, and scholarly works, while ensuring **rightsholders retain control** through title-level opt-ins and exclusions. Recent initiatives include the **UK's Copyright Licensing Agency (CLA)** and **PLS/ALCS collective AI licences**, **Germany's VG WORT framework** with RightsDirect. These pilots demonstrate how established collecting societies can quickly adapt existing infrastructure—used for schools, universities, and governments—to cover AI training uses. They also show the key questions being worked through: **pricing, usage reporting, opt-out mechanisms, and governance for sensitive content**, such as Indigenous Cultural and Intellectual Property (ICIP). Together, these developments highlight the potential for **voluntary, market-driven solutions** that deliver scale and certainty without statutory mandates.

c) Australian readiness: Australia's collecting societies already operate blanket licences across education, government, and business at national scale. The underlying infrastructure—collection management, distribution rules, and reporting pipelines—is well established and proven. These frameworks are ready to cover AI uses, while new commercial licences for publishing content could be developed with only minor adjustments.

It is also highly likely that new data intermediaries will emerge in the marketplace to facilitate both direct and collective licensing deals, further smoothing transactions between rightsholders and AI developers.

3.4.3 Licensing improves quality, provenance, and trust

Scraped datasets introduce **bias, inaccuracy, and legal uncertainty**. Licensed datasets are **curated**, **auditable**, and **domain-relevant** (e.g., curriculum-aligned; peer-reviewed). Training on licensed corpora improves product reliability, reduces "hallucinations," and supports **traceable attribution**, which end users and regulators increasingly expect.

3.4.4 Licensing is treaty-compliant and internationally interoperable

A broad TDM exception would struggle under the **three-step test** (Berne/TRIPS): A broad TDM exception is unlikely to qualify as a "certain special case," would "conflict with normal exploitation," and would "unreasonably prejudice" rightsholders. Licensing, by contrast, upholds exclusive rights and aligns with the global copyright framework that underpins cross-border trade in cultural goods.

3.5 Pricing: the Missing Piece in the Commission's Analysis

The Productivity Commission's interim report discusses copyright exceptions and licensing in abstract terms but does not confront the practical question of **pricing inputs under a licensing model** – or the question of extractive profits by tech companies through access to unpriced training data, or the "right-sizing" of the Australia AI market. The interim report understates the economic viability of licensing and overstates the case for a TDM exception. Pricing is not a barrier—it is the mechanism that aligns incentives, clears markets, and sustains innovation.

3.6 Addressing Common Concerns about Licensing

Licensing for AI is often misunderstood. While critics raise concerns about speed, cost, focus, and fairness, there are practical solutions that already work in education, business, and government. By adapting these proven systems, Australia can build a clear and lawful framework that supports innovation and protects creators.

"Licensing will be too slow." Australia can start with **known licensing machinery**: reuse collective licensing rails already serving education, business and government. Direct deals are already being signed in Australia and overseas; standard modules will compress timelines here.

"tech start-ups can't afford it." Tiered pricing and staged fees solve this. Moreover, clarity avoids the larger risk—building on unlicensed data and facing a shutdown, injunction, or retroactive fees later. Deals are already emerging, including those covering Australian content, such as the recent HarperCollins agreement. Many authors and publishers are eager to participate, seeing these licences as a fair, lawful way to support innovation while generating new income streams.

"Outputs, not inputs, should be the focus." Both matter. Input licensing aligns incentives and improves models; output transparency supports trust and downstream compliance (especially in education and research).

"AI is just like reading, not copying": AI training is not like human reading. It involves making complete, machine-readable copies of works at massive scale, storing and processing them to extract patterns—an act far beyond the fleeting, personal use of reading by a human being

"Why a higher bar for local developers than overseas's scrapers": Strong, lawful licensing framework protects Australian creators and developers alike, ensuring local companies can innovate without legal risk or reputational harm. Lowering standards to match unlicensed overseas scraping would only undermine domestic industries while giving foreign platforms a free pass to exploit Australian content.

3.7 The Case for Guardrails for ICIP, Young People, and Research Integrity

The Productivity Commission urges caution on proposed AI guardrails, but a licensing-first framework shows that well-designed safeguards are not a barrier — they are an enabler. Guardrails create the conditions for AI to be adopted responsibly, ensuring innovation is sustainable, trusted, and aligned with Australia's cultural and educational values. Instead of abandoning them, the Commission should recommend integrating guardrails into licensing models and regulatory supports.

Practical safeguards can be embedded into licensing agreements and sectoral protocols:

- **Indigenous Cultural and Intellectual Property (ICIP)**: A text-and-data-mining (TDM) exception would **conflict with Australia's cultural responsibilities to First Nations peoples** and with **industry best practice for responsible AI**. By permitting large-scale copying without consent and without guardrails, it would undermine core ICIP principles—**self-determination, free prior and informed consent (FPIC), cultural integrity, secrecy/confidentiality, attribution, and benefit-sharing**—set out in nationally endorsed protocols (e.g., *True Tracks* and *Protocols for using First Nations Cultural and Intellectual Property in the Arts*) and reflected in *Revive*'s **First Nations First** priority. A consent-free TDM regime normalises **opaque, untraceable training** and undermines **provenance, auditing, data minimisation, erasure rights**, and **Indigenous data sovereignty (CARE)**. In short, a broad TDM exception would replace **consent-based, community-governed access** with unilateral extraction—eroding cultural rights while embedding poor technical governance.

  Guardrails must require explicit consent, ensure **community representation in governance**, allow **sensitive material to be excluded or time-limited**, and establish **revenue-sharing rules** that recognise custodianship.

- **Education:** AI systems used in learning environments should reinforce curriculum integrity, maintain transparency around their sources, and support teachers and students with trustworthy, rights-respecting content. **They must also safeguard student privacy, avoiding the capture or misuse of personal data, and be designed to minimise cultural bias or the spread of misinformation**. Without these protections, there is a real risk that AI could erode educational standards, expose students to inaccurate or harmful material, and compromise the inclusive values that underpin Australia's education system.

- **Research Integrity:** AI tools in research should **preserve provenance and citation standards**, ensure clarity between human-authored and AI-generated material, and align with established academic publishing norms.

These guardrails are practical, proportionate, and achievable. They safeguard the quality of information, uphold cultural rights, and protect public confidence. Far from slowing innovation, they provide the trust framework that allows AI adoption to scale responsibly.

3.8 Compliance, Audit, and Dispute Resolution Within a Licensing-First Framework

Licensing can only function as a trusted and scalable pathway for AI if it is accompanied by guardrails that protect quality, integrity, and fairness. These guardrails are not about abandoning licensing in favour of heavy-handed regulation; rather, they are practical arrangements that make a licensing-first system workable and enforceable.

- **Compliance:** Licensing agreements should include clear but proportionate requirements for developers to demonstrate that they have obtained and used content lawfully. Simple reporting and verification mechanisms build confidence without stifling innovation.

- **Swift Redress:** A fast, affordable mechanism for resolving disputes is essential. By providing a dedicated pathway outside costly litigation, rightsholders can enforce their rights effectively while developers gain certainty and closure.

4.0 Conclusion

Australia can—and should—embrace the opportunities of AI without undermining the creative economy that sustains it. A licensing-first approach offers legal certainty for both developers and rightsholders, ensures that AI systems are trained on higher-quality, provenance-rich content, and maintains the investment needed to support Australian voices, education, and research. It also keeps Australia aligned with its treaty obligations and interoperable with global markets. For these reasons, **we urge the Commission to recommend that Australia retain the current copyright framework (Option 1), support licensing pathways in practice (Option 2), and firmly reject a TDM exception (Option 3)**, which would collapse emerging licensing markets, conflict with international law, and shift costs onto creators and small publishers. By reinforcing licensing, transparency, and enforcement, Australia can foster responsible AI innovation while protecting its creative sector—and ensure that Australian stories, scholarship, and teaching remain strong in the digital future.

5.0 Enclosures

With permission from the United Kingdom Publishers Association (UKPA) the APA encloses the following submissions (available on their website:) from the UKPA to the UK Government consultation into Copyright and AI which closed on 25 February 2025:

- UKPA **statement on the close of the consultation**
- UKPA **full response** to the consultation
- **Legal Opinion of Nicholas Caddick KC**
- **Verbatim reproductions of Harry Potter – Meta's Llama 3**
- **Legal Analysis on Infringement and Exceptions**
- **Briefing on Opt -Out Workability**

The APA also points to the emailed communication or submission from the **International Publishers Association** (and a network of national and regional publishers associations) which provides a comprehensive understanding of the legal issues and emerging international developments in relations.

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