UK Government Copyright and Artificial Intelligence Consultation
Association of Illustrators Response

25/02/2025

About the Association of Illustrators (AOI):

The Association of Illustrators was established in 1973 to advance and protect illustrators' rights and is a non-profit making trade association dedicated to its members' professional interests and the promotion of contemporary illustration. Today, the AOI has 2,400+ members, including freelance individuals, illustrators' agents and universities. As the only body to represent illustrators and campaign for their rights in the UK, the AOI has successfully increased the standing of illustration as a profession and improved the commercial and ethical conditions of employment for illustrators. The AOI offers members professional and business advice, as well as representing the interests of thousands more illustrators across the UK.

Association of Illustrators
Somerset House, Strand
London, WC2R 1LA

theaoi.com

Introductory Comments:

The Association of Illustrators represents the collective interests of professional illustrators, drawing from a comprehensive survey of 6,844 respondents to provide critical insights into the impact of AI on our creative community.

Illustrators have consistently embraced technological advancements throughout their history. From the early adoption of Adobe's Photoshop and Illustrator to today's widespread use of Procreate, digital tools have enhanced our craft rather than replaced it. Our members create commissioned works across diverse sectors—from book publishing and advertising to animation, digital media, and corporate design—whilst developing distinct artistic voices that maintain their industry relevance.

Whilst illustrators readily embrace technological progress and some even incorporate AI-assisted tools in their work, they face an unprecedented threat. Generative AI platforms are directly competing with illustrators by using their original works without permission or compensation. Our survey reveals that 32.40% of illustrators have already lost commissions to AI alternatives, with affected artists losing an average of £9,262 each—a trend that threatens both individual livelihoods and UK's position as a global creative leader.

The widespread scraping of illustrators' work by AI developers represents a fundamental breach of creator's rights. Our members invest years in education and skill development, creating copyrighted works that hold significant commercial value. This value should not be transferred without consent from individual tax-paying freelancers to tech companies.

We strongly oppose the proposed opt-out system with default opt-in provisions. This system would place an impossible burden on illustrators who must maintain an online presence to secure work. Our survey demonstrates overwhelming opposition to this approach, with 91.62% of illustrators supporting Option 1 and 92.65% finding individual opt-outs unfeasible.

The government's consultation process reveals a concerning bias towards Option 3—a position confirmed by the Prime Minister on 13th January. This approach lacks crucial implementation details and fails to address the past illegal use of creative works by AI developers. When using the haveibeentrained.com website [1], illustrators have discovered vast numbers of their images in the LAION 5B dataset, currently being used to train generative AI systems. Notably, 99.05% of our survey respondents demand retrospective compensation for past scraping, and 98.68% call for full dataset transparency.

The AOI advocates for:

- Option 1, which provides clear creator control, encourages fair compensation, and maintains existing successful licensing frameworks.
- The addition of mandatory transparency measures, including disclosure of complete training datasets, sources, and specific works used.
- Retrospective compensation for past infringements.

The government's vision for AI to benefit everyone cannot be realised while undermining the creative industries that contribute so substantially to British culture and economy. Environmental concerns about AI servers' substantial energy consumption during a global energy crisis add another layer of urgency to this issue.

AI developers claim their access to creators' content will bring significant financial advantages to the UK, yet there have been no economic impact assessments to support this statement. They also incorrectly suggest that UK copyright law lacks clarity—a position we strongly dispute. Our copyright legislation has proven highly successful and clear. We urge the government to champion copyright compliance, transparency, and robust AI regulations that protect creators' rights while fostering genuine innovation.

---

[1] haveibeentrained.com

The path forward requires meaningful protection of illustrators' rights and fair compensation for their work. Through proper licensing and enforcement of existing copyright frameworks, both creative and AI industries can thrive, positioning the UK as a global leader in ethical AI regulation.

Please note that an overview of the complete AOI survey results is available at the end of this document.

C.1 Exception with rights reservation:

Question 1. Do you agree that option 3 is most likely to meet the objectives set out above?

The AOI strongly opposes Option 3. This opposition is based on comprehensive evidence showing that Option 3 fails all three of the Government's stated objectives: control, access, and transparency.

Our national survey demonstrates clear consensus from illustrators:

- 96.41% of illustrators oppose Option 3
- 92.65% say individual opt-outs would have a detrimental impact on their businesses

Option 3 fundamentally fails on multiple levels:

1. It reverses established copyright principles by making unauthorised use the default, unfairly shifting responsibility from AI companies to individual creators. As Baroness Kidron aptly notes: *"Should shopkeepers have to opt out of shoplifters? Should victims of violence have to opt out of attacks?"*
2. It creates an unworkable system based on the flawed EU model, where years after implementation, no effective opt-out mechanism exists.
3. It violates the internationally binding Three-Step-Test, which the UK must follow as a World Trade Organisation member.

The Government's economic growth argument lacks evidence. There's no proof that allowing AI companies free access to copyrighted works is essential to boost AI development. Access to copyright-protected works is already available to AI developers through established licensing models.

Additionally, the practical barriers are insurmountable:

- Both URL based and file based opt-outs are inadequate.
- No mechanism exists to control downstream usage.
- The administrative burden on creators would be excessive.
- Many creators lack the technical expertise to use opt-out tools.
- Current tools provide no confirmation that opt-outs have been successful.

- Once work is incorporated into AI models, removal is technically impossible.
- Rapidly changing web scraping technology makes consistent opt-out systems unfeasible.

The AOI's position aligns with industry expert Ed Newton-Rex's view: *"The only way to effectively ensure that rights holders' works are not used for generative AI training against their wishes, in a way that is fair to both rights holders and AI companies, is for training to be based on opt-in consent."* This opt-in approach, requiring AI companies to secure proper permission, is the only fair and workable solution.

Question 2. Which option do you prefer and why?

The AOI strongly supports Option 1 as the only viable approach to protect creators' rights and ensure fair compensation. Our position is backed by overwhelming evidence from our membership:

- 91.62% of illustrators favour Option 1, supporting strengthened licensing requirements.
- 99.05% demand retrospective compensation for past unauthorised use of their work.

The economic implications are significant. With the UK's creative industries contributing £124.8 billion GVA annually [2], we must safeguard the framework that enables this substantial economic contribution. Proper licensing requirements are not unnecessary obstacles - they are essential mechanisms that protect creators' livelihoods and ensure sustainable creative industry growth.

The alternative options present significant risks.

- Option 0 (Do Nothing): Fails to address the urgent need for enforcement of existing copyright frameworks.
- Option 2 (Broad Exception): Severely undermines creator rights and livelihoods.
- Option 3 (Exception plus Opt-Out): Has been proven to be unworkable in the EU to date.

We emphasise that Option 1 must include the addition of robust transparency requirements. These should include clear disclosure of existing datasets, comprehensive auditing mechanisms, mandatory labelling of AI-generated outputs, and detailed documentation of how licensed works will be used. These measures are crucial for creators to make informed decisions about licensing their work.

As Lord Freyberg has noted, the premise that existing copyright law lacks clarity is simply untrue - a position promoted by tech lobbyists. In reality, *"the use of copyrighted content by AI companies without a licence constitutes theft on a mass scale."* However, by strengthening our existing licensing frameworks, Option 1 provide a clear path forward. It acknowledges that while commercial generative AI development is valuable, it must not

---

[2]

come at the expense of creators' rights. This approach ensures fair compensation, maintains market integrity, and provides a sustainable future for both the tech and creative industries.

Question 3. Do you support the introduction of an exception along the lines outlined above?

The AOI opposes the proposed opt-out system, which poses a significant threat to creators' livelihoods and fundamentally violates centuries of established copyright protection. Our position is supported by overwhelming evidence - 92.65% of our members confirm that opt-out schemes are unfeasible for individual creators, while over 47,000 people, including prominent UK arts figures, have condemned unlicensed generative AI training as a "major, unjust threat" to creative livelihoods. [3]

The proposed exception presents three fundamental problems:

1. Threat to Creators' Rights and Livelihoods:

    •   It poses a substantial risk to individual creators' livelihoods and fundamentally violates creators' rights.
    •   An overwhelming 92.65% of creators confirm that opt-outs are unfeasible for them.
    •   The anticipated economic benefits remain entirely speculative, with no evidence that the current licensing regime impedes UK AI innovation.

2. Technical Issues:

    •   No effective opt-out schemes currently exist to reliably prevent content from being used in AI training.
    •   Technical standards for machine-readable opt-outs remain undeveloped, even several years after the EU exception.
    •   Proposed solutions like central directories and automatic content recognition are ineffective.
    •   The common robots.txt method offers no control over downstream copies.

3. Administrative and Legal Complications:

    •   The system places an unreasonable administrative burden on rights holders, particularly freelance individuals.
    •   Opt-out deadlines impose undue pressure and limit real control over creative works.
    •   The system potentially breaches the Berne Convention by imposing formalities on copyright enjoyment.
    •   Many rights holders will remain unaware of their ability to opt out, leading to low take-up.

---

[3] https://www.aitrainingstatement.org

The UK's creative industries have flourished under our globally recognised copyright regime, bringing opportunities for cultural expression, education, and economic growth. The proposed exception would severely undermine this success by allowing AI companies to create direct competition without creators' consent or compensation. This reverses centuries of copyright protection and contradicts the fundamental principle that creators should control how their work is used.

Furthermore, the binary nature of opt-out schemes creates an impossible choice between maintaining internet visibility and protecting work from AI training. Our survey results show that 88.65% of illustrators are concerned that opting out of their website being crawled could also negatively affect your discoverability online. The proposed system also problematically implies exoneration of past infringements, whereas 99.05% of creators believe that there should be retrospective compensation for past infringements by AI companies.

Given these significant concerns, the AOI urges the government to reject this unworkable and unfair opt-out system. Instead, we advocate for strengthening licensing requirements to protect the rights and livelihoods of creators who are the backbone of our nation's cultural success. The broad coalition of creator voices speaking out against this proposal demonstrates a shared recognition of its harmful implications for the UK's creative sector.

Q4. If so, what aspects do you consider to be the most important? If not, what other approach do you propose and how would that achieve the intended balance of objectives?

The illustration community strongly supports Option 1, which maintains licensing requirements for AI training data, as evidenced by the overwhelming 91.62% support from UK illustrators. This clear consensus reflects our industry's deep understanding of both practical needs and ethical considerations.

Our current copyright framework is both clear and workable, giving the UK the opportunity to position itself as a global leader in ethical AI regulation. Our creative industries represent significant economic value that could be jeopardised by Option 3's more permissive approach. The viability of licensing is already demonstrated by a number of AI companies successfully operating under such agreements, with many rights holders showing willingness to engage in these partnerships.

We must recognise that generative AI directly competes with the work it's trained on. This fundamental market reality makes licensing not just preferable, but essential. While AI companies invest significantly in computing resources and talent, training data deserves equal consideration as a vital resource. Though licensing may require more investment from AI companies than unauthorised use, it represents the only equitable approach that balances innovation with creator rights.

Any workable framework must protect creators, particularly smaller rights holders and individuals, from undue administrative, technical, or financial burdens. This includes ensuring comprehensive protection of downstream copies of works. The system must

enable creators to maintain internet visibility whilst protecting their work from unauthorised AI training and adapt to developing web scraping technologies.

The AOI maintains that proper licensing creates the stable foundation needed for ethical AI advancement. Rather than hindering progress, it ensures sustainable industry growth by acknowledging the fundamental value of creative work. A licensing framework provides clear, workable mechanisms for AI development while protecting the rights that underpin our creative economy. This approach not only safeguards creator rights but also strengthens the UK's position as a leader in responsible AI development.

Question 5. What influence, positive or negative, would the introduction of an exception along these lines have on you or your organisation? Please provide quantitative information where possible.

The economic impact of AI on illustrators is already severe and measurable, with 32.4% of professionals reporting direct loss of work to AI competition. This erosion of professional opportunities comes at a particularly challenging time, as median earnings for creative professionals have already seen significant decline during the costs of living crisis. Any copyright exception would only accelerate this deterioration.

By the nature of our work, illustrators often have large numbers of images visible online. In fact, 32.78% of illustrators have over 500 individual illustrations published across a range of online platforms. This extensive digital footprint spans personal websites, social media, client websites, stock image sites, educational resources, publishing platforms, and online marketplaces. Such widespread presence makes any comprehensive opt-out mechanism practically impossible to implement effectively. The administrative burden of tracking and protecting work across multiple platforms would be overwhelming for individual creators and small businesses.

As one AOI survey respondent has observed *"I think the opt-out model is far too arduous for illustrators to use, especially as most of us are self-employed/small businesses. It is already very difficult for illustrators to keep control of their work in a global market where large companies can and do steal images, and if AI model have a get-out-free clause then it will be even more difficult for illustrators to assert themselves. I believe that the only sensible option that allows for AI models to access data is for an opt-in system to be developed." Survey Respondent (illustrator)*

Despite their limitations, AI tools already compete directly with illustrators through advantages of speed and cost. The fundamental issue remains that generative AI represents competition built using creators' own work without consent. Any exception allowing this would create an unprecedented situation where professionals are forced to actively prevent their work from being used by their competitors. The AOI maintains that this approach would cause irreparable damage to the UK creative industries, individual livelihoods, and ultimately, the broader economy. Instead of an opt-out system, we advocate for an opt-in framework with clear mechanisms for creator compensation and control.

Question 6. What action should a developer take when a reservation has been applied to a copy of a work?

The current legal framework is unambiguous: consent must be obtained before copyrighted work is used, typically through licensing arrangements. As previously highlighted, the AOI fundamentally opposes the concept of rights reservations, supported by overwhelming illustrator feedback showing that opt-outs are technically impossible to implement effectively.

The scale of the challenge is immense. The average illustrator maintains hundreds of images across multiple platforms, with no practical way to track all instances of their work online. Current technology simply cannot manage comprehensive opt-outs, making any proposed reservation system fundamentally unworkable.

A strengthened licensing framework (Option 1) provides the only clear, workable solution by:

- Ensuring proper compensation for use of creative works.
- Maintaining robust protection of creators' rights.
- Providing clear guidelines for AI companies from the outset.
- Establishing transparent compliance guidelines and reporting requirements.

For developers to attempt to implement an opt-out system effectively, we believe they would face insurmountable technical and practical challenges:

- Estimated decade-plus development time for robust technical measures.
- Requirement to maintain comprehensive databases of opted out works.

Essential requirements should also include:

- Obligation to remove all previously scraped works and track synthetic data usage.
- Immediate retirement and retraining of models using opted-out work.

The existing opt-in licensing framework remains the most practical and fair solution, avoiding the complicated and ultimately unworkable opt-out mechanisms while protecting creators' rights from the outset.

If, despite these significant concerns, the Government proceeds with an exception including reservations, such reservations must be respected transparently throughout the supply chain, with remedies constituting genuine deterrents to ensure compliance. However, the extensive technical, practical, and administrative burdens of any opt-out system demonstrate its fundamental unfeasibility compared to the current licensing framework.

Question 7. What should be the legal consequences if a reservation is ignored?

The enforcement of copyright protection in AI development demands robust and decisive measures to effectively safeguard creators' rights. The current challenges facing individual

creators in pursuing legal recourse are prohibitive, with costly proceedings, and the practical impossibility of tracking violations across international jurisdictions.

We strongly advocate for a comprehensive enforcement framework that includes:

- Substantial statutory damages aligned with CMA standards, including penalties of up to 10% of annual income for infringement.
- Criminal penalties for wilful copyright violations, paralleling Technical Protection Measures standards.
- Personal director liability to ensure accountability at the highest corporate levels.
- Mandatory auditing requirements and transparent compliance reporting.

Should an opt-out system be implemented (which we strongly oppose), the enforcement framework must be even more stringent, incorporating:

- Enhanced statutory damages for ignored reservations.
- Criminal penalties for systematic violations.
- Streamlined legal pathways for creators to challenge AI companies.
- Retrospective compensation, supported by 99.05% of illustrators.

The penalties must constitute a genuine deterrent while ensuring fair compensation for creators. This comprehensive approach to enforcement, combined with maintaining the current opt-in system, offers the most practical and effective protection for creators' rights in the AI landscape.

Question 8. Do you agree that rights should be reserved in machine-readable formats? Where possible, please indicate what you anticipate the cost of introducing and/or complying with a rights reservation in machine-readable format would be.

Machine-readable rights reservations present fundamental technical, practical, and legal challenges that make them an unsuitable solution for protecting creators' rights in AI development. While we maintain that such reservations are unnecessary under the current consent-based system, should the government proceed with this approach, several critical issues must be addressed.

The technical limitations are severe and multifaceted:

- Current location-based opt-outs only function effectively within controlled domains, failing to protect content across the wider internet.
- There is no viable solution for controlling downstream content usage once works are copied or redistributed.
- The binary nature of existing systems forces creators to choose between maintaining internet visibility and protecting their work from AI training.

The practical burden on creators is particularly concerning. Research indicates that 60% of artists are unfamiliar with basic tools like robots.txt [4], highlighting a significant knowledge gap. Implementation challenges include:

- The continuous administrative burden of tracking and protecting works.
- Unrealistic time pressures for AI training deadlines.
- The technical unfeasibility for most individual creators.
- The inability to protect works that have already been scraped by AI systems.

If the government proceeds with machine-readable reservations, despite these concerns, the system must:

- Enable comprehensive opt-out of both direct and downstream copies.
- Allow creators to prevent AI training without sacrificing internet visibility.
- Avoid imposing administrative, technical, or financial burdens on creators.
- Provide reasonable timeframes for decision-making and implementation.
- Address historical infringements effectively.

The EU example clearly demonstrates how AI developers attempt to shift compliance burdens onto rightsholders. Instead of pursuing this problematic path, we strongly advocate for Option 1's centralised licensing framework, which:

- Establishes fair compensation structures.
- Eliminates the need for complex technical implementation by creators.
- Protects creators' existing rights without additional burden.
- Provides clear mechanisms for managing and protecting creative works.

Any machine-readable format must be exceptionally simple and free to individual creators and rightsholders. However, the fundamental impracticality of machine-readable reservations, combined with their potential to undermine existing rights, strongly supports maintaining the current consent-based licensing framework.

C.2 Technical standards

Question 9. Is there a need for greater standardisation of rights reservation protocols?

The standardisation of rights reservation protocols for AI training would not only fail to address the fundamental problems faced by creators but would actively compound existing challenges while creating new barriers for individual artists. This is particularly concerning given the complex and diverse nature of how illustrators' work is distributed online.

The scale of the challenge is staggering. Illustrators typically distribute their work across numerous platforms simultaneously:

---

[4] https://arxiv.org/html/2411.15091v1#S3

- Personal websites and portfolios.
- Multiple social media platforms.
- Client websites and online marketplaces.
- Publishing platforms and art communities.
- Educational resources and academic publications.
- Archive collections and library websites.

This widespread distribution makes comprehensive protection through opt-out mechanisms practically impossible. Our research reveals that 92.65% of illustrators confirm that individual opt-out schemes are unfeasible, highlighting the fundamental disconnect between theoretical solutions and practical reality.

The proposed standardisation would introduce several critical problems:

- It fails to address the protection of downstream copies once work is redistributed.
- It places an unreasonable administrative burden on rights holders, many of whom lack the technical expertise or resources to implement such measures.
- It may create additional administrative challenges for vulnerable creators, including disabled and neurodivergent artists.

As one AOI survey respondent stated, *"As a disabled illustrator, I have very few avenues open to me for work aside from this one. With my income from commissions, I can live as an independent member of society. Without it, I would need to rely heavily on government aid to survive. There are so many of us who may not have the capacity or the resources to navigate an opt-out system, especially if every piece of our existing work needs to be addressed individually."*

This response underscores how standardisation could disproportionately affect creators who already face significant challenges.

While standardisation might appear beneficial on the surface, it fundamentally:

- Shifts focus from protecting creator rights to enforcing technical compliance.
- Creates potential technical monopolies that could increase costs for creators.
- Fails to address the multi-tier combination of copyright works within existing licensing frameworks.
- Offers no guarantee of compliance from AI companies, who have historically delayed implementation of protective measures.

Rather than pursuing standardisation of opt-out protocols, which would further complicate creator responsibilities, the focus should remain on protecting creator rights through proper licensing requirements. If the Government proceeds with a TDM exception despite these concerns, any standardisation must prioritise simplicity, accessibility, and effectiveness while ensuring that technical implementation does not create additional financial burdens for creators.

The fundamental unfairness of an opt-out approach cannot be remedied through standardisation alone. Instead, we must focus on developing systems that protect creators' rights while recognising the practical realities of how creative work is distributed and monetised in the digital age.

Question 10.   How can compliance with standards be encouraged?

Ensuring compliance with standards requires a robust, multi-faceted approach centred on mandatory licensing, stringent enforcement, and comprehensive transparency measures. Our research shows overwhelming support for this direction, with 98.68% of illustrators advocating for mandatory disclosure of training data.

A legally enforceable framework must include:

- Deterrent penalties set at sufficiently high levels to prevent infringement.
- Clear financial consequences for non-compliance that reflect the commercial scale of AI operations.
- Regular, independent auditing requirements with public reporting obligations.

The implementation of mandatory licensing requirements should be at the core of any compliance framework. Collective Management Organisations (CMOs) can play a vital role here by:

- Simplifying the process for both rights holders and users.
- Coordinating licensing across multiple creators and platforms.
- Ensuring fair remuneration reaches creators.

Transparency requirements are essential for maintaining accountability:

- Comprehensive documentation of all training data sources.
- Auditable records accessible to rights holders.
- Clear reporting channels for suspected violations.

The existing legal framework provides a foundation that should be strengthened rather than undermined. This includes:

- Full enforcement of current copyright protections.
- Integration with established rights management systems.
- Clear compliance guidelines that align with international standards.

CMOs are particularly well-positioned to encourage compliance through their established infrastructure and experience in managing rights at scale. Their existing regulatory frameworks and transparency standards could potentially be leveraged to ensure oversight of AI training data usage in future.

Any compliance framework must prioritise creator protection while providing legitimate pathways for AI development. The focus should remain on establishing and enforcing clear

standards that protect creators' rights and ensure fair compensation, rather than creating exceptions that could undermine existing protections.

Question 11. Should the government have a role in ensuring this and, if so, what should that be?

Effective regulatory oversight is essential for protecting creators' rights in the AI landscape, particularly given that commercial generative AI training on copyrighted work without a licence is already illegal under existing law. The focus must be on enforcement rather than creating new exceptions that could undermine established protections.

A robust oversight framework requires:

- A dedicated regulatory body with clear enforcement authority and resources.
- Substantial penalties for non-compliance that reflect commercial scale.

The Government's role should focus on enforcing existing copyright law and holding AI developers legally accountable. This includes:

- Requiring demonstrable transparency in data collection.
- Supporting the development of collective licensing services.
- Protecting creators' livelihoods from exploitation by global tech companies.

The Government should maintain a balanced approach that:

- Enforces existing copyright law rather than creating new exceptions.
- Encourages AI developers to engage in proper licensing practices.
- Supports both individual and collective licensing models.

It is crucial to recognise that this isn't about creating new frameworks but rather enforcing existing legal protections. The current copyright law provides adequate protection; what's needed is robust enforcement to ensure AI developers comply with these established legal requirements. This approach protects creators' rights while providing clear pathways for legitimate AI development.

C.3 Contracts and licensing

Question 12. Does current practice relating to the licensing of copyright works for AI training meet the needs of creators and performers?

The current impact of unregulated AI training on the UK's creative industries is severe and quantifiable. With 32.40% of illustrators already reporting work lost to AI and an overwhelming 99.05% supporting the need for retrospective compensation, there is an immediate threat to the UK's position as a global creative leader.

While the existing legal framework clearly establishes that commercial AI training requires proper licensing and explicit permission for using copyrighted works, the reality shows a concerning disconnect. Current practices demonstrate widespread non-compliance:

The vast majority of creators have never been approached to licence their work for AI training purposes. Instead, internet scraping without permission or payment remains the predominant method of data collection.

While examples like Harper Collins demonstrate that individual licensing for specific rights is feasible [5], such practices remain rare. This publisher's approach - seeking consent case-by-case, providing agreed fees, and sharing revenue between publisher and creator - shows that AI development is possible when there is a willingness to respect creators' rights.

The emergence of platforms like Blunge.ai shows potential for legitimate AI integration in creative workflows [6]. However, these isolated examples highlight the broader industry's failure to establish proper licensing practices. While AI holds potential value as a creative tool, this potential cannot be realised at the expense of creators' rights and livelihoods.

The focus must be on enforcing existing protections while addressing emerging challenges, particularly in synthetic data usage. Without rigorous enforcement and appropriate strengthening of current frameworks, the UK risks undermining its creative industries. The solution lies in ensuring compliance with established legal requirements and fair compensation for creators.

Question 13. Where possible, please indicate the revenue/cost that you or your organisation receives/pays per year for this licensing under current practice.

The current reality of AI training licensing shows a systemic failure in creator compensation. Most illustrators receive absolutely no payment for the use of their work in AI training, despite widespread commercial exploitation of their creative assets. This represents a significant revenue loss for creators whilst AI companies continue to operate without proper licensing arrangements.

The avoidance of established licensing frameworks by AI companies appears to be deliberate and strategic. These organisations are effectively gambling on a lack of government enforcement, making minimal effort to establish proper licensing channels despite having the resources to do so. This behaviour stands in contrast to their willingness to cover other operational costs and investments.

The current situation represents more than just a regulatory oversight - it reflects a conscious choice by AI companies to exploit regulatory uncertainty and avoid established copyright frameworks. Many are treating creator compensation as optional rather than a fundamental business cost, despite building their entire business models on creators' work.

---

[5] https://www.theguardian.com/books/2024/nov/19/harpercollins-tech-firms-books-train-ai-models-nonfiction-artificial-intelligence

[6] Blunge.ai

The solution requires treating creative works used in AI training as what they are - essential raw materials that deserve fair compensation - rather than free resources to be exploited. Without immediate action to enforce proper licensing requirements, we risk normalising a business model built on the systematic exploitation of creators' work.

Question 14. Should measures be introduced to support good licensing practice?

Strong measures to support good licensing practice are essential and urgently needed. The overwhelming industry consensus is clear - with 99.45% of illustrators supporting mandatory AI content labelling, demonstrating the profound need for transparency in how creative works are being used in AI development.

Two fundamental requirements of any effective licensing framework:

- Robust enforcement of existing copyright law, with clear and meaningful consequences for violations.
- Mandatory transparency requirements for all AI training data usage, enabling creators to track how their work is being utilised.

The current lack of these basic protections has created an environment where AI companies can exploit creative works without accountability or proper licensing arrangements. This situation undermines the fundamental principles of copyright law and threatens the sustainability of professional illustration as a viable career.

Successful implementation requires a comprehensive approach that combines strict enforcement of current copyright law with new transparency requirements. These measures are not optional extras but fundamental requirements for establishing fair practices in AI development. The near-unanimous support from the illustration community underscores their importance in protecting creators' rights and ensuring the continued strength of the UK's creative sectors.

Question 15. Should the government have a role in encouraging collective licensing and/or data aggregation services? If so, what role should it play?

Yes, encouraging voluntary collective licensing services would be essential. Whilst illustrators typically manage direct licensing for their commissioned work, they also benefit from established collective licensing systems that handle secondary uses of visual art. Collective licensing agencies such as DACS have been a vital part of the visual arts economy for many years. However, for this system to work effectively with AI, transparency over training data would need to be a fundamental requirement.

Question 16. Are you aware of any individuals or bodies with specific licensing needs that should be taken into account?

Individual creators are likely to have limited resources for rights management, and many may have little awareness of opt-out options. The licensing option relies on creators being able to opt out, so awareness would be essential.

It is important that individual creators, such as freelance illustrators, are recognised as potentially unequal partners in the negotiation of licences for their artwork. AI developers of any size, but particularly the large ones, should ensure that they agree to or offer licensing fees at an appropriate level. The practical and contractual aspects of licensing must be very clear so that all creators understand and approve the details of what is being licensed and for what uses.

Respondents to the AOI survey who identify as neurodivergent or disabled commented on the potential difficulties for them of an opt out system, and the same could apply to unclear, or overly convoluted licensing. On opts outs, one disabled respondent said, *"While the proposed system may not be intentionally discriminatory, it is discriminatory nonetheless."*

A significant number of illustrators identify as neurodivergent or disabled. In a 2023 membership survey over 13% of AOI members said they had a disability and nearly 30% considered themselves to be neurodivergent. No one should be disadvantaged, and fundamentally, fair terms and licensed remuneration are the building blocks for the inclusive and diverse industry we all wish to see.

Any weakening of copyright protection would create an insurmountable burden for individual illustrators, particularly affecting those without sufficient technical knowledge or substantial resources.

Illustrators licence their work, and the fee relates to how the images are used, where they will be used (territory) and for how long (licence duration). Challenges for illustrators for licensing may include the scale of individual creator image portfolios:

- 32.78% of UK illustrators maintain over 500+ illustrations online.
- 92.65% confirm individual opt-out is unfeasible.

Also, in terms of opting out, the downstream usage and placing of images outside of an artist's own website/URL creates exponential complexity, as the work may not be licensed for these uses.

C.4 Transparency

Question 17. Do you agree that AI developers should disclose the sources of their training material?

We strongly support mandatory disclosure of AI training sources to ensure that AI developers are complying with copyright law.

We confirm a clear demand for accountability, with 98.68% of illustrators endorsing mandatory disclosure, backing the overwhelming industry consensus for transparency

Transparency is crucial, but it must be paired with strong copyright protection rather than exceptions that would legitimise unauthorised use of creative works. Transparency alone is insufficient without copyright protection, and it should support, not replace, proper licensing.

Open reporting from AI developers with technically detailed records of works scraped and used in pre-training, training and fine-tuning, benefits all legitimate players. AI developers should not claim that such information would be a business secret, as hidden sources have potential to mask copyright infringement. For there to be trust in AI outputs from creators and the public, transparency is required, including:

- Identification of works that will be or have already been used to train LLMs in order to demonstrate compliance with UK law.
- Detailed metadata about the sources of training data.
- How and when copyright works are accessed throughout the value chain (for example at the point of ingestion and use in generating AI- generated outputs or new datasets).
- Information on the method of data collection applied by the AI developer because different models (e.g. repertoire based or general web scraping) require different licences.

Question 18. If so, what level of granularity is sufficient and necessary for AI firms when providing transparency over the inputs to generative models?

Transparency requirements must be comprehensive and detailed enough to enable full understanding and verification of AI training data sources, including both direct and synthetic data usage. There must be minimum standards for transparency, and with appropriate remuneration for all past and future uses.

For illustrators to be confident that they were receiving sufficient information, they would expect source documentation to include a full list of all their works that had been used, attribution for them as the original creator, statistics detailing the usage frequency of works, all the training purpose details and tracking of a derivative works.

In terms of technical implementation details, importantly there need to be crawler and scraper identification that is separate for those allowing searches to find websites. So, URL access logs with timestamps along with dataset compilation methods, and of course licensing agreement details. Also, AI developers must remove any copyright protected works which have been used without authorisation from their system.

For any use of synthetic data, the information required will need to show how the synthetic data was created and what original training data sources were used in that process.

The level of required documentation from AI developers will need to be detailed enough to track individual artwork usage and of a level that is sufficient for creator identification. Audit trails will be important, and information will need to be sufficient to allow for that.

Question 19. What transparency should be required in relation to web crawlers?

Clear regulation and detailed transparency are essential for maintaining compliance with legal standards and protecting rights holders in the use of web crawlers and other AI data collection tools.

Transparency would include mandatory crawler transparency requirements, including real-time notification to websites with URL visitation logs with timestamps. Also, clear identification of crawler purpose so that a website's accessibility through search engines is not compromised. The ability to distinguish between crawlers for SEO and crawlers for data collection would an essential requirement for this to be workable, to ensure a creator's discoverability online is not impacted.

The level of data disclosed by AI developers would need to be comprehensive, including metadata record-keeping for ingested materials; the publication of detailed data ingestion information on AI developer websites (also adding to the public's confidence in AI outputs). These information requirements would enable creators to exercise and enforce their rights.

AOI supports the Amendment 205 to the Data (Use and Access) Bill proposed by Baroness Kidron, Lord Freyberg, Lord Stevenson of Balmacara and Lord Clement-Jones in relation to transparency of web crawlers. [7]

Question 20. What is a proportionate approach to ensuring appropriate transparency?

An appropriate approach is that all the requested details on transparency are made publicly available to all those parties whose work has been licensed or scraped. We emphasise that comprehensive transparency and auditing measures are crucial to protect rights holders and maintain fair practices in the use of AI training data, this includes:

- Training source disclosure, so publicly accessible lists of all training data sources, detailed metadata record-keeping and standardised reporting formats.

- Regular auditing requirements with consistent auditing schedules, comprehensive audit trails and compliance with transparency standards.

- Transparency and auditability which would include publication of detailed data ingestion information on AI developer websites and labelling of AI-generated outputs

- Specific legislative requirements should include the legal basis for data processing (GDPR) and compliance measures with UK copyright law.

Question 21. Where possible, please indicate what you anticipate the costs of introducing transparency measures on AI developers would be.

---

[7] https://bills.parliament.uk/bills/3825/stages/19280/amendments/10016161

Certain elements of AI development are very expensive, and the transparency costs should be funded at the same level. AI developers will be paying for all aspects of their business, staff, premises, power and more, and the costs of running their business should include the cost of licensing and the building in of all required transparency measures. AI developers must bear the cost of identifying creators.

"The only acceptable solution would be to ensure full transparency from the AI companies in regard to exactly what artists media they use for training models, with fair compensation agreed with any participating artist in form of a licensing agreement." AOI Survey respondent (illustrator).

Transparency should also be applied to all creative works previously scraped from the internet, with AI developers compensating creators retrospectively. This cost should be considered.

Costs for transparency should include remuneration for images included in existing datasets being used by developers. Over 99% of respondents to the AOI survey believe creators should be compensated retrospectively for past infringements by AI companies.

Question 22. How can compliance with transparency requirements be encouraged, and does this require regulatory underpinning?

Compliance with transparency requirements should be mandatory and required by law and with appropriate deterrents. This requirement would encourage trust in AI systems and platforms. The scraping of 5.85 billion images which make up the 2022 LAION 5B dataset [8] (used by many generative AI platforms and updated in August 2024) without permission or remuneration has understandably made illustrators mistrustful of the companies that use datasets that include their images to train their generative AI. Many generative AI companies do not disclose their dataset composition, so creators are not given any direct opportunity to know if their works are involved – unless outputs indicate that they are.

Where there is legal certainty around transparency, illustrators would be able to believe they could trust developers. A voluntary approach would not show that developers were complying with copyright law. Creators need to be aware of exactly where their works have been taken from, and to understand how they are being used should they choose to licence their works. They need to know what details the licence will cover to be able to licence in the first instance.

So, to encourage the uptake of licensing copyrighted works for AI training, potential licensors of works need to trust the AI developers proven use of transparency.

"Trust is an aspect of the relationship between a business and who it is licensing works from which can be fundamental. I would be willing to allow my work to be scraped for a fee, but that answer is HIGHLY conditional, as the behaviour and ethics of clients I work for is very

---

[8] https://laion.ai/blog/laion-5b/

important to me -- unfortunately I don't really see any of the main AI companies as 'good' businesses; ethically, environmentally, or socially." AOI Survey respondent (illustrator).

Question 23. What are your views on the EU's approach to transparency?

As suggested in consultation paragraph 111, a requirement of 'solely listing the main data collections or sets that went into training a model, and summarising other sources' as transparency requirements would not be sufficient. It would not be feasible for creators to put time into finding out if their work was included in a number of datasets. It might not actually be technically possible. So, true transparency would not exist.

Creators must have the transparent and auditable information that we have detailed in our earlier questions responses. So, we do not consider the EU's approach to transparency to be sufficient.

"As someone who worked as an illustrator and now works as a computer scientist, data disclosure and ethical use of data should be the baseline for all model training. It is the bare minimum and is not difficult to implement. The fact that this is not standardised is absurd to me." AOI Survey respondent (illustrator).

Any claim by AI developers that transparency requirements cannot be acted on due to 'commercial sensitivity' does not qualify as a legitimate reason. A creator's right to know if their copyright protected works have been exploited prevails over the commercial interests of a developer.

C.5 Wider clarification of copyright law

Question 24. What steps can the government take to encourage AI developers to train their models in the UK and in accordance with UK law to ensure that the rights of right holders are respected?

The Government can emphasise to AI developers that there is no 'existing ambiguity' in UK copyright law, and ensure that the copyright rights of creators are enforced. This will assist in building trust between creators and AI developers, which will encourage uptake of licensing.

The UK could be the leader in ethical AI regulations with high quality data sets licenced from creators within the UK, utilising our world leading creative industries rather that cannibalising them.

"I strongly believe that we should retain a model which protects the copyrighted works of creators as priority. Creative industries in the UK are enormously profitable and the key to that profitability is the ability to protect creative copyright. It is also worth taking into consideration, that while the industries are profitable, many individual creatives are self-employed, and many are uniquely vulnerable to being harmed by allowing AI to mine their works without compensation or consent." AOI Survey respondent (illustrator).

Question 25. To what extent does the copyright status of AI models trained outside the UK require clarification to ensure fairness for AI developers and right holders?

An AI model trained outside the UK but accessing UK protected content should not be allowed to operate in the UK and sell its product in this territory if it does not comply with UK law.

Question 26. Does the temporary copies exception require clarification in relation to AI training?

We believe that copying during AI training falls outside the temporary copies exception because these copies are neither temporary/ephemeral, nor transient/incidental. The copies made for AI training are permanent and intentional parts of the training process. Therefore, the current exception needs no clarification.

However, if any changes to this definition are considered, the purpose of the clarification should be to explicitly state that AI training copies are <u>not</u> covered by the temporary copies exception.

Question 27. If so, how could this be done in a way that does not undermine the intended purpose of this exception?

No response.

C.6 Encouraging research and innovation

Question 28. Does the existing data mining exception for non-commercial research remain fit for purpose?

Yes, as long as the data gathered this way for non-commercial research is not subsequently used for commercial purposes.

A guidance notes from the IPO, in consultation with stakeholders, could clarify the limits of this exception and make it clear that commercial usage is strictly prohibited.

Question 29. Should copyright rules relating to AI consider factors such as the purpose of an AI model, or the size of an AI firm?

Copyright law should apply to all aspects of AI and all organisations, regardless of those factors.

D.1 Computer-generated works: protection for the outputs of generative AI

Question 30. Are you in favour of maintaining current protection for computer-generated works? If yes, please explain whether and how you currently rely on this provision.

The AOI firmly believes that copyright protection should be reserved exclusively for human creators. We stand alongside the Creators' Rights Alliance and the British Copyright Council in this position. Our members, who have dedicated years to developing their craft, create work through genuine human inspiration, skill and effort—a process fundamentally different from AI systems that simply process prompts to generate content.

Copyright protection for computer generated works, if applied to AI-generated content, would compete directly with human creations in the marketplace. This is particularly concerning as these AI systems rely on human-created works for their training, yet their outputs could potentially flood the market, undermining our members' ability to earn a living and sustain their professional careers.

In alignment with the British Copyright Council, we recognise that there is little evidence of reliance on the existing Section 9(3) provisions. Furthermore, we share concerns about the lack of clarity in how these authorship provisions align with established copyright frameworks under Berne and TRIPS.

Question 31. Do you have views on how the provision should be interpreted?

We support the British Copyright Council's comments that it is always concerned to see removal of potential copyright protections which might benefit rightsholders.

However, we understand the Government's position regarding the removal of Section 9(3), given its current ambiguous nature. We acknowledge that discussions about copyright ownership for computer-generated works must continue at an international level, particularly regarding works which are generated independently and distinctly from the types of work otherwise recognised under exiting copyright treaties.

Question 32. Would computer-generated works legislation benefit from greater legal clarity, for example to clarify the originality requirement? If so, how should it be clarified?

Originality must remain intrinsically tied to human creativity and authorship, reflecting current legal standards for originality.

We are of the opinion that that when our members create original works whilst using AI as an assistive tool, their work remains protected under Section 4 Artistic Works of the UK Copyright, Designs and Patents Act 1988 (CDPA). The use of AI technology as a creative aid or enhancement tool does not diminish the copyright protection of human-authored works.

Question 33. Should other changes be made to the scope of computer-generated protection?

No

Question 34. Would reforming the computer-generated works provision have an impact on you or your organisation? If so, how? Please provide quantitative information where possible.

No

Question 35. Are you in favour of removing copyright protection for computer-generated works without a human author?

We are not aware of any members relying on this provision. It has been widely accepted that generative-AI prompted outputs do not qualify for copyright protection as they are not expressly controlled by the user.

The consultation states that 'Works that are AI-assisted but which exhibit human creativity would continue to be protected.' This distinction is vital, as many of our members may use generative AI as one tool among many in their creative process. The protection of these human-created works must remain intact.

We support illustrators to use AI elements within their works, however we firmly believe copyright protection should apply only to the human-authored elements of any work. This position maintains clear boundaries while supporting creative innovation.

Question 36. What would be the economic impact of doing this? Please provide quantitative information where possible.

No response.

Question 37. Would the removal of the current CGW provision affect you or your organisation? Please provide quantitative information where possible.

No.

D.4 Infringement and liability relating to AI-generated content

Question 38. Does the current approach to liability in AI-generated outputs allow effective enforcement of copyright?

No, barriers to enforcement of liability for creators include the lack of resources available to individual creators to pursue infringements. The illustrator needs to know that their work has been included in a dataset to be able to pursue any enforcement (so transparency is required). The time and expense of enforcement would make a recourse to law very impractical to creators whose focus will be on managing their freelance business and maintaining a career.

Question 39. What steps should AI providers take to avoid copyright infringing outputs?

To avoid copyright infringing outputs AI providers should only use datasets of legally licensed works.

Providers should also prevent prompts that request outputs that are 'in the style of' a named artist.

The provider should be responsible for preventing users uploading any in-copyright data to be included in a training dataset.

Illustrators all have a unique style and have developed visual problem-solving abilities (conceptual artwork used in many editorial areas, for example), and that is their selling point to potential commissioners - having a recognisable visual voice and distinct approach to image making. Their reputation rests on the artwork they produce, and they cannot have AI generated images being produced that may appear to be created by them which reduces their commissions as well as degrades their reputation.

D.5 AI output labelling

Question 40. Do you agree that generative AI outputs should be labelled as AI generated? If so, what is a proportionate approach, and is regulation required?

Yes. Regulation is required to ensure that labelling is consistent and applied by AI developers to synthetic images and other generative AI products.

99.45% of respondents to the AOI survey said that there should there be mandatory labelling requirements for AI-generated content to help users distinguish between human and AI-created works.

Question 41. How can government support development of emerging tools and standards, reflecting the technical challenges associated with labelling tools?

No response.

Question 42. What are your views on the EU's approach to AI output labelling?

Illustrators support labelling, and 99.45% of respondents to the AOI survey agreed there should be mandatory labelling requirements for AI-generated content to help users distinguish between human and AI-created works.

We understand that mandatory labelling has not started yet in the EU.

D.6 Digital replicas and other issues

Question 43. To what extent would the approach(es) outlined in the first part of this consultation, in relation to transparency and text and data mining, provide individuals with sufficient control over the use of their image and voice in AI outputs?

The approaches outlined in the first part of this consultation, in relation to transparency and text and data mining would not provide any meaningful control of individuals' image and voice.

Question 44. Could you share your experience or evidence of AI and digital replicas to date?

We are aware of illustrators' work which has been closely replicated by generative AI, indicating the consultation comments that AI *"is unlikely to generate a copy of a specific work that it was trained on"* is not accurate. Inputting a prompt of, '*in the style of XX*', can produce AI-generated output images that closely replicate elements of that artist's style.

This issue is a major concern for illustrators, with the possibility of their own personal creativity being undermined by inferior output work which could be used commercially (or non-commercially) instead of their human produced work, resulting in an impact on their income, reputation and career.

[Chris Haughton](#) is a very successful, award winning illustrator and author of books for children. His titles include *A Bit Lost*, *Shh, We Have A Plan* and *The History of Information*, and he describes the impact of his work being included in generative AI datasets:

*"I asked the AI image generator MidJourney to create 'a squirrel in the style of Chris Haughton'. At first it generated a photorealistic squirrel wearing my glasses. But after I clarified that I wanted images in my art style rather than my style of dress it came back with images that certainly had my colours, shapes and backgrounds. It looked like art I might draw on a bad day. But it was my work nonetheless. And that is the thing. It **was** my work.*

I then asked ChatGPT to create a story in the style of Chris Haughton. It came back with language and content that was familiar about a lost animal. Again, it had been clearly referencing my stories. When I looked to see if my images were in the training set at 'Have I Been Trained?' my images were everywhere, thousands of them. Many in duplicate. One of my images, a book cover, appears duplicated in the set at least 29 times." Chris Haughton.

AI platforms actively encourage this prompting of named artists to copy their visual style. For example, Stable Diffusion's own Prompt Guide says:

4. Artist Reference
Referencing specific artists can significantly shape the visual output. Mentioning renowned artists like Van Gogh or Frida Kahlo can infuse your image with their unique styles.

This means that users are *actively* encouraged to prompt the production of images that copy the work of artists, including those who are in copyright.

University of Cambridge and Minderoo Centre for Technology and Democracy recently published a report on AI's impact on creative industries. One key recommendation which the AOI supports, is that Government should produce guidance on 'The need for recognition and compensation to artists whose name and canon are used in prompts to AI models that generate outputs'.[9]

D.7 Other emerging issues

Question 45. Is the legal framework that applies to AI products that interact with copyright works at the point of inference clear? If it is not, what could the government do to make it clearer?

The existing legal framework is clear that authorisation must be sought prior to an act of reproduction; this applies regardless of whether the act takes place at the point of inference or during model training.

There is no ambiguity requiring Government clarification. We would support the Government making a statement reconfirming that copyright law applies to restricted acts at the point of inference.

Question 46. What are the implications of the use of synthetic data to train AI models and how could this develop over time, and how should the government respond?

Synthetic data is trained on models which have been trained on unlicensed work that is in copyright, so any data used in this way should be licensed. There should be transparency obligations for AI developers on synthetic data in addition to the data it is trained on.

Question 47. What other developments are driving emerging questions for the UK's copyright framework, and how should the government respond to them?

We are not aware of any other issues.

AOI Survey Results:

Data collected from 6,844 UK Illustrators.

1. How many of your individual images would you estimate are online overall? Please estimate the total number of your images across all platforms - including your website, social media, and client websites. Count each instance of an image, even if it appears multiple times.

---

[9] https://ai.cam.ac.uk/reports/2025-policy-brief-ai-copyright-and-productivity-in-the-creative-industries

50-99 – 21.21%

100-199 - 21.60%

200-499 - 24.42%

500-999 - 14.55%

1000+ - 18.23%

2. Would it be feasible for you to opt out all the above images individually, without negatively impacting your business?

Yes – 7.35%

No - 92.65%

3. Are you concerned that opting out and preventing your website being crawled could negatively affect your discoverability online?

Yes – 88.65%

No - 11.35%

4. What is your preferred option?

0 – 3.90%

1 – 91.62%

2 – 0.89%

3 – 3.59%

5. Moving forwards, would you be willing to licence your work to AI companies for generative AI training purposes, if offered an appropriate fee?

Yes – 21.10%

No – 78.9%

6. Many AI companies have already scraped millions of images without creator consent or compensation to train their models. Should creators be compensated retrospectively for past infringements by AI companies?

Yes – 99.05%

No – 0.95%

7. Do you agree that AI companies be required to detail all works used in their datasets?

Yes – 98.68%

No – 1.32%

8. Should there be mandatory labelling requirements for AI-generated content to help users distinguish between human and AI-created works? (optional)

Yes – 99.45%

No – 0.55%

9. Are you aware that you have lost work as the result of a client choosing to use generative AI instead?

Yes – 32.40%

No – 67.60%

10. If so, can you estimate the financial loss you have incurred to date?

Average - £9,262 per affected illustrator

Select Quotes from survey respondents:

"I do not believe that any AI companies should have the right to scrape any creatives work to train their AI. The work is the property of the creatives own mind and should not be allowed to be used by anyone in this way. The government should be protecting the rights of the individual creative. We should not have to be in the situation where we have to opt out, our rights should be protected" AOI survey respondent

"I'm concerned about the long term impacts the erosion and devaluing illustration as AI creeps into the territory of creative work and what impact this will have on the quality of our culture and the need to protect illustration as something culturally valuable that then over time develops some kind of heritage value. Illustration is something that should be protected and has value to transform how people view things. The creative sector in the UK is historically rich and innovative and well regarded and a home-grown industry that exports their good worldwide. By not protecting these industries it is made increasingly difficult for creatives to continue making a living and threatening the longevity and future of these industries" AOI survey respondent

"An opt-out system would create additional, unnecessary barriers for creatives, who already juggle so many different tasks and roles as freelancers. Endorsing the use of generative AI in this way, with no compensation for the original artists, undermines our craft, adding to the stigma surrounding careers in the arts. It would be incredibly difficult to opt out every single

piece of artwork that Illustrators, like myself, have shared over multiple years, and across multiple online platforms." AOI survey respondent

"As an illustrator who is just starting out, I feel a huge sense of dread knowing that there is easy access AI generators in the battlefield. I have no doubt that it has and will continue to gravely impact the illustration community. The impact of generative AI has had an incredibly negative impact on my morale as a creator, and especially a new postgrad illustrator." AOI survey respondent

"I strongly believe that we should retain a model which protects the copyrighted works of creators as priority. Creative industries in the UK are enormously profitable and the key to that profitability is the ability to protect creative copyright. It is also worth taking into consideration, that while the industries are profitable, many individual creatives are self-employed, and many are uniquely vulnerable to being harmed by allowing AI to mine their works without compensation or consent." AOI survey respondent

For further information about this consultation submission, please contact Rachel Hill (AOI CEO) at rachel@theaoi.com