



The Dy. Registrar of Copyrights  
Copyright Office, DIPP  
Ministry of Commerce & Industry  
New Delhi - 110 075

9 October 2018

Dear Shri Hoshiar Singh,

**Ref: 10-03/2016-CRB/L.U with respect to the Application of the Screenwriters Rights Association of India for registration as a copyright society under Section 33 of the Copyright Act, 1957.**

The International Authors Forum (IAF) expresses its support for the application of the Screenwriters Rights Association of India (SRAI) to be admitted as a copyright society by the Indian Government. The IAF represents nearly 700,000 authors worldwide through its 67 members, campaigning for their interests. Collective management and administration of authors' rights is the only way that many authors can receive fair payment for the use of their work; a contribution to society which is not well-paid in general.

In the case of SRAI, it would provide this service to authors who are currently not able to receive royalties for the use of their works without a society to administer them. It is essential that working authors are able to receive an income as a matter of fairness, especially when those distributing their works, through producing or publishing, make a living doing so. There is no reason the author should be denied recognition and remuneration for their creation.

SRAI has undertaken years of dedicated research and engagement internationally with the collective management system and network to enable it to operate. They will be able to facilitate royalty and license fee payments where its members' works are used internationally and to deliver payments to overseas authors when their work is used in India. It will therefore be providing an international service.

As SRAI has explained, amendments to the Indian Copyright Act give new rights to authors, entitling them to royalty payments for the use of their works in films. It is crucial that systems are put in place enabling these rights to be exercised and payments to be made. This is a matter of practical importance and of principle. The link between an author and their work is recognised by copyright, enabling payment to sustain the author so that they may create new work and retain a link to their work. Therefore they may have a say over its use, can use it in other ways if they wish, and have a share in its success. Royalty payments and licensing fees are ideal for this purpose; they enable negotiation of a fair price and grant the author security in knowing that if their work is being used, they will be fairly rewarded and can earn a living.

Due to the ease of duplicating and sharing work digitally, and a general lack of awareness that an author's creation cannot be taken for free without permission, it is vital that copyright societies and collective management organisations are supported by governments. This is important for authors of all categories, whether they are writing for films, novels, painting or writing music.

#### International Authors Forum

Barnard's Inn  
86 Fetter Lane  
London, EC4A 1EN  
United Kingdom

T: +44 (0) 20 7264 5709  
E: [barbara.hayes@internationalauthors.org](mailto:barbara.hayes@internationalauthors.org)  
[www.internationalauthors.org](http://www.internationalauthors.org)

It is vital that a countries governments support these endeavours, so that local creators and creative industries are fostered, local languages and cultures preserved, and people do not lose their heritage. Creators and consumers of copyrighted work in every country must be able to benefit from their creativity and enjoy the benefits of local history, education and entertainment that are important to retain.

With copyright law, as can be seen in Canada where changes to copyright have jeopardised collective management of copyright work, authors and the sectors that benefit from their work have suffered significant financial losses. This can lead to less diverse work made by local creators, and means countries must start relying instead on imported material, jeopardising their own businesses and copyright industries. It would be a shame if this were to happen in India by prohibiting the registration of SRAI, leaving authors without a source of income for their work.

As stated by SRAI, if there are issues with their constitution or articles of association which make them non-compliant with copyright law in India or other relevant regulations, they are prepared to amend them accordingly.

If you would like to discuss this further with the IAF, we will happily oblige.

Yours sincerely,

John Degen

A handwritten signature in black ink that reads "John Degen". The signature is written in a cursive, flowing style with a large initial 'J' and 'D'.