



Rt Hon Lucy Frazer KC MP,  
Secretary of State,  
Department for Culture, Media and Sport,  
100 Parliament Street,  
London,  
SW1A 2BQ

11 July 2023

Dear Secretary of State,

I am writing to you as Chief Executive of UK Music, the collective voice of the world leading UK music industry, in relation to the impact of artificial intelligence on our sector.

There is much to excite us about AI development. However, the use of AI to generate music raises difficult questions which we believe Government must urgently address, particularly around permission and transparency.

In recent conversations with the sector, you have asked for a clear position from the music industry about AI and the challenges it poses. Following much consideration and careful thought around the issue, UK Music has reached an agreed policy position which seeks to address these questions.

This policy position is attached and sets out five key principles which we ask the Government to adopt when approaching regulation of AI: the importance of creators' choice and consent, the need for record keeping, the important principle that without human creativity there should be no copyright, the requirement for AI-generated works to be clearly labelled, and the need for protection of personality rights.

The position includes reference to areas we want to protect the current regulatory standards, in particular around respecting creator choice and the need to avoid new exceptions to copyright. It also highlights areas where we believe there could be a strengthening of the current framework. A requirement for record keeping and the labelling of AI-generated content are proposals that have support not just in the music industry, but across a number of other sectors. And, as we set out in the paper, there is a strong case to introduce a new personality right to protect the personality and image of songwriters and artists.

Ultimately, we believe that a responsible and balanced approach to AI must be centred on the principle of consent. As an industry, we are excited about some of the opportunities that AI offer, and want to work with the technology sector to help seize these opportunities. However, it is not acceptable for creators' work or their identity to be used by AI developers without their consent. Taking other people's work without their permission contravenes basic principles of property rights, undermining both creator incomes and the economic model which has enabled the UK to build a world leading music industry.

It is important to stress that the music industry has good relations with the technology sector and we are proud of the many positive relationships and partnerships we have built with technology companies. But in trying to seize the opportunities of AI, it's vital that we do not

allow some AI firms to crush the human creativity which is the beating heart and soul of our world-leading music industry.

UK Music has positively engaged with the Intellectual Property Office's Working Group on a Copyright and AI Code of Practice. As a member of this working group we welcome the opportunity, along with other representatives of rightsholders, to engage with user groups. We look forward to discussing any practical challenges that they may face. To date we do not believe specific barriers to using music have been identified. We strongly believe that meaningful progress can only be achieved based on factual evidence and good faith cooperation and remain committed to active participation in this working group.

Without original content to ingest, it would not be possible to produce AI-generated content. AI generates – it never creates. So it is absolutely critical we develop AI technologies in a way that enhances and enables human artistry rather than eroding it.

I strongly welcome the Government's identification of the creative industries as one of the five key growth sectors for the UK. As we look to unlock the potential of the creative industries, we must ensure the music industry and the tech sector grow in partnership, and the right guardrails are in place as we develop our AI sector.

Our position paper sets out the principles we believe must be enshrined by Government in order to achieve that.

I would be delighted to discuss this further with you or your officials, and look forward to working with you to ensure the development of AI is a benefit rather than a barrier to our fantastic music industry.

Yours sincerely,



**Jamie Njoku-Goodwin**

*Chief Executive*

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Viscount Camrose, Parliamentary Under Secretary of State (Minister for AI and Intellectual Property), Department for Science, Innovation and Technology

Rt Hon John Whittingdale OBE MP, Minister of State for Media, Tourism and Creative Industries and Minister of State (Minister for Data and Digital Infrastructure)