

International Association of Music Libraries, Archives and Documentation Centres

United Kingdom and Ireland Branch

founded 1953



Gowers Review of Intellectual Property: IAML(UK & Irl) response

IAML(UK & Irl) is the professional association which represents the interests of institutional and individual members involved in the provision of music library services throughout the United Kingdom and Ireland. It is a cross-sectoral organisation whose members include public, academic, national, special and broadcasting music libraries, as well as representatives of music publishing (with whom we have a good relationship in the UK) and library supply. IAML(UK & Irl) welcomes the opportunity to comment on this subject as its members have a long history of upholding copyright law while recognising that there must be a balance between rights holder and user interests. IAML is also in a position to represent the rights of music users generally, as they are our customers and have few avenues of formal representation. Therefore we represent the public good as opposed to commercial interests, although as some of our members are also rights holders we are in a position to have a balanced overall view. IAML(UK & Irl) is a member of LACA (the Libraries and Archives Copyright Alliance) and supports the views and detailed suggestions expressed in the LACA response and in submissions from other library organisations including The British Library. The points made below are those of specific interest to our own members.

General questions

1. How IP is awarded

1.b. How easy is it to find out about obtaining IP rights?

There is a common misconception that copyright has to be registered. We are often asked by people who have written music how they can register their work.

2. How IP is used

2.a. What types of IP does your organisation use and why?

Our members' libraries contain and make available music and related information in all formats: printed, recorded, databases and online sources. Maintenance of and access to musical information is the reason for our existence.

2.f. How well does the UK IP system promote innovation?

Copyright protects the results of innovation. Unfortunately we do not believe it promotes innovation, certainly for students of music and for smaller concerns such as independent record companies specialising in historical performances. The performance of contemporary music is hindered by much printed music being available only for hire rather than purchase, therefore there is a significant cost to the institution or individual in addition to the performance licence.

It is often stated that the music industries within the UK contribute a great deal to the wealth of our nation, but without fair access to printed and recorded music we run the risk of cutting off the flow of creative musicians for the future.

2.i. Do you have any evidence as to the static or dynamic costs that IP rights impose on the economy?

There is, of course, a cost for licensing the use of music, but possibly as significant is the time involved in seeking permission. In one particular music college, for example, it can take 20 minutes of staff time to negotiate making adjudicators' copies of one small piece of around 5 minutes for student auditions and internal examinations. In the latter case they also have to provide each student with written evidence that permission has been granted to hand to the examining panel. Given that over 100 pieces at a time have to be cleared in this way, this represents a great deal of time both for library and publishers' staff. In most cases, the publishers kindly make no charge, but if fair dealing were to be extended to include fair copying for performance examinations, this administrative burden would be lifted.

Where licence fees are levied, for instance from Phonographic Performance Limited to allow the playing of recordings in libraries, the time taken to fill in licence forms can be out of proportion to the playing time of the music involved. (See section 3.a)

2.j. Have you encountered IP rights being used defensively?

In several known instances the right to use quotations under the criticism and review exception has been denied. Some publishers levy charges to quote passages of music in analytical studies, in spite of the fact that this statutory permission is confirmed and supported by case law (e.g. *Pro Sieben Media and Fraser Woodward v BBC*).

Misleading comments appear in some publications. The blanket assertion that "photocopying music is illegal" takes no account of exceptions such as fair dealing.

Any extension of the term of protection for sound recordings (see relevant section) would prevent others from freely using and making available material which the rights holders have no intention of exploiting.

3. How IP is licensed and exchanged

3.a. How easy is it to negotiate licences?

Obtaining licences from Phonographic Performance Limited and the Performing Right Society can be confusing and time-consuming, although staff are generally helpful and approachable. Approaches to individual companies, on the other hand, are met with a variety of responses and, in some cases, no response is received.

In the past, some major music publishers supplied authorised photocopies to replace individual instrumental parts which had been lost and were out of print or otherwise unobtainable. This valuable facility has been discontinued in some cases as publishers' business has been consolidated in mainland Europe. If there is no legal way to replace missing parts, this means that a costly set of music, purchased with public money, is unusable.

It would be helpful if the statute stated that it is not necessary to request payment for licences: some rights holders do provide free licences for activities which are legally within their control and this is, of course, very welcome.

(See section 4.f for comments on the relationship between contract and copyright)

3.c. How easy is it to use others' IP for research purposes?

It can be costly and difficult for students to study contemporary pieces of music, especially as they are needed for long periods of time and hire charges mount up. Hire only pieces are not normally received by the British Library via legal deposit so cannot be studied there. The problem of spurious conditions being imposed on using music quotations in musicological works is mentioned above (2.j).

3.f. Are there specific barriers to licensing IP in your sector?

The problem of using orphan works is a real barrier (see relevant section)

4. How IP is challenged and enforced

4.f. Are there specific barriers to challenging IP rights for small businesses & individuals?

As in the examples above, we see that individuals or small institutions can sometimes have no option but to comply with a false position if they have insufficient legal knowledge or resources to challenge rights holders.

DRM systems are physical barriers, especially for people with disabilities who have the right to receive information in accessible formats.

Seeking removal of these barriers is time-consuming and out of proportion to much small-scale use. The need for printed music for performance is time-specific; if the required permission is not given in time then the performance has to be abandoned.

Licences and contracts should not be allowed to supersede or diminish the statutory exceptions and limitations to copyright provided in UK legislation and associated regulations. Any term or condition in a licence or contract which purports to remove statutory rights should be null and void and it should become an offence to make an unjustifiable threat of infringement proceedings. This would be similar to provisions in patents and trademark law and will extend such protection to users of copyright works. We support the LACA recommendation concerning suitable amendments to the Act.

4.h. What are the principal barriers to efficient & successful challenge & enforcement internationally?

It is not recognised in all countries that a balance is required between rights holders and the public good. Despite the EC Directive, there is no real harmonisation because of the antithesis between common and civil law jurisdictions for individual countries (e.g. UK law applying to German publications).

This particularly concerns this association as music is an international language and publications should be accessible by musicians, students and music lovers from all member countries whatever their language. Industry representation within Europe is very powerful and it is important the UK Government holds to the fundamental principle of access to information for all.

Specific issues

Current term of protection on sound recordings and performers rights

This is a matter of vital importance to music in libraries and educational establishments. We understand the unease expressed by rights holders but there must be a fair balance.

a. What are your views on this issue?

- The existing terms of protection, while complicated, follow a logical hierarchy, contradicting the claim that the music sector is treated unfairly by the current law.
- We have seen cases where technical protection measures prevent consumers from using their purchases. Technical protection can, in effect, give perpetual protection, which goes against the public good.
- The industry's argument is that extension will allow them to invest in new talent. Many new and successful artists are, in fact, signed to independent companies or are self-published. Some are only signed by major record labels once they are popular and established.
- Record companies currently have the right to reissue their own lucrative recordings in advance of anyone else; their ability to produce reissues and profit by them is not

threatened by retention of the current term.

- Certain high profile performers have been lobbying for this extension, saying that they will no longer receive royalties for their work. This view confuses copyright with royalties; royalties should be negotiated on the basis of likely sales irrespective of copyright terms. They are free to negotiate contractual terms to receive royalties for longer than the term of protection if they wish. In many cases, since with modern pieces the work performed will still likely be in copyright (since it will run for 70 years from the death of the composer), other record companies will be unable to issue competitive re-issues without infringing the copyright in the underlying work. Hence there will be no loss of revenue to the performer.
- Librarians are committed to the principle of rewarding creators and upholding the law, but there must be a fair balance. Therefore we believe that the term of protection accorded to sound recordings must not be extended; any such extension would be to the detriment of education and access to our cultural heritage.
- The British Library response gives practical examples of the impact of this subject and we support their response.

b. *Is there evidence to show the impact that a change in term would have on investment, creativity and consumer interests?*

- Historical recordings are increasingly important for research, the study of performance history, and the promotion of interest in a variety of interpretations. To require copyright clearance to be sought for such recordings would seriously stifle advances in music research and education. More detail may be found in the CHARM response and we concur with their views.
- Small enterprises are able to support a wide range of historical and specialist recordings which add diversity and interest to the market and help to fill the need of educational research. An extension would prevent them from re-issuing many interesting performances to the public as a whole.
- Major recording companies' reissues in this field in the US are estimated as 2% of back catalogue. (Library of Congress study *Copyright Term Extension: Estimating the Economic Values. E Rappaport 1998.*) Assuming that the picture has not changed significantly and that the UK industry follows a similar pattern, a blanket extension would result in 98% of recordings being tied up by protection of 2%.
- If re-issuing recordings were left entirely to the original companies, many more valuable and interesting recordings would lie unheard and the market would reflect even further the current emphasis on a few popular artists. Two examples can be provided here:
 - i) Mono era LPs: The major companies have only ever re-issued a very small number of these on CD and have concentrated on popular, saleable artists. Without the efforts of small companies, a discerning audience would have no access to these performances
 - ii) Wagnerian recordings on 78rpm: the original EMI recordings of Act 1 of Die Walküre with Melchior, Lehmann and List would not be available on CD if a small company (Pearl) had not been able to reissue it. There are many such examples. Even with the growth in providing back catalogue as downloads, it is debatable whether many historical recordings will be made available in this way.
- Any extension will lead to a monopoly, as the winners would be the four major companies. It is unhealthy to have so few big players: this stifles the industry rather than promotes it.
- Extension will lead to higher prices, either from the majors re-issuing at a higher price (possible because of the lack of competition), or smaller companies paying more to license the production of recordings or going out of business. The consumer will effectively be subsidising the largest companies.
- The suggestion that British recording companies and artists would cease to operate in the UK cannot be supported.
- Music by artists who have written their own material (e.g. The Beatles) will, of course, still be

protected by creators' rights (70 years after death) so such artists will not suffer if an extension is not granted.

- Many creators (i.e. composers) would not benefit from an extension as deals are signed between publishers (who have the rights assigned to them) and record companies.
- The question of preservation is one of very serious concern; continual use of the original recordings will destroy them. It is vital to be able to record them so that access can be via newer, more flexible, formats and to preserve the original carrier.

c. *Are you aware of the impact that different lengths of term have had on investment, creativity and consumer interests in other countries?*

- Parity with the US is quoted as an argument for extension, but the US has fair dealing for recordings, and the licensing system is different, so this requires careful scrutiny.
- The argument in favour of the US model does not hold. A study in 2005 by Tim Brooks of the availability of historical recordings in the US (<http://www.cllr.org/pubs/abstract/pub133abst.html>) shows that the supposed encouragement to copyright holders to release backlists has had very little effect; the result is that the vast majority of the American cultural heritage of recorded music is simply inaccessible to the public. Since the adoption of this model in the US, a significant increase in the number of 'orphan' works has been noted.
- A consultation by the European Commission in 2004 concluded that there was no justification or need for change; there is even the suggestion that the term should be reduced.
- Within an expanding Europe, particularly the newer accession countries, immediate access to the wealth of musical performances of the past greatly enriches musicians, students, and a public which is hungry for wider knowledge. Anything leading to increased purchase costs will be counter-productive.

d. *Are there alternative arrangements that could accompany an extension in term?*

We do not believe that the request for extension can be supported by the evidence. Unless the companies made their entire back catalogues available, access to our musical heritage would be seriously impaired. Even then, many valuable master recordings may have been lost so could not be made available except by using archive copies in public and private collections.

e. *If term were to be extended should it be retrospective or solely for new creations?*

We believe that an extension should not be granted. The reversion into copyright of composers during the previous changes to terms for printed material resulted in confusion and chaos. Whatever else the law should provide, it should also provide clarity and certainty.

Copyright exceptions - fair use / fair dealing

a. *What are your views on the current exceptions?*

The current exceptions are, in general, fair, and cannot be seen to have had damaging effects on rights holders. They should, however, be brought up to date by including all classes of media; the present situation is confusing and unhelpful, restricting access to and fair use of some forms of information (e.g. recordings) and excluding certain activities such as fair copying of music for use in performance exams. Exceptions can be made unavailable by the use of DRM or by misunderstanding of exceptions by rights holders and users alike.

b. *Could more be done to clarify the exceptions?*

It needs to be made clear that exceptions arise from statute, rather than as a concession from rights owners. As we have seen, the criticism and review exception in particular is misunderstood. There is a need for guidelines and user education based on law rather than

perception. It would be helpful if the statute explicitly stated that when an activity came under an exception, no permission from the rights holder was necessary.

(See section 4F for comments on the relationship between contract and copyright.)

c. Are there other areas where copyright exceptions should apply?

We support the LACA recommendations, which provide greater detail and proposals for amended wording. The following areas are of particular interest to our members.

General and educational exceptions to copyright

We believe that s.36 could be amended to allow a teacher or lecturer to copy from a work *by any means* for ‘the sole purpose of illustration for teaching’ (i.e. in class or in closed access Virtual Learning Environments) for a non-commercial purpose. Forbidding copying by reprographic methods limits the amount that may be copied to inadequate amounts. For illustrative purposes it is necessary to copy more than may be copied by hand; this is particularly time-consuming with music notation.

Libraries and Archives: CDPA ss.38-44 (see also SI 1989/1212)

We wish to see the following amendments to library exceptions:

- i. Extend the library/archive copying regulations to other cultural institutions, notably museums and public galleries, to permit all authorised employees of such institutions, not just those in their libraries or archives, to provide a copy of a work or part of a work held in the institution’s permanent collection to an individual requiring it for the purposes of research for a non-commercial purpose or private study, or to another museum or gallery for preservation or replacement purposes on a similar basis to prescribed libraries and archives. Some musical institutions operate museums which co-operate with, but are not run by, the library.
- ii. Extend the classes of works which prescribed libraries, archives and museums and galleries may copy for individuals under statutory exceptions provided by ss.37-43 to include artistic works, film, sound recordings and recordings of broadcasts. In the public’s eyes, there is no logic in differentiating between a printed work and a recorded version. For many people, a recording is their only access to that work; for example not everyone can read music so need to listen to a recording to experience that music.
- iii. Add new provisions in the Act to allow museums, galleries, prescribed libraries and archives to be able to make both analogue or digital copies of all classes of works (whether originally in analogue or digital format) held in their permanent collections for curatorial and preservation purposes. The British Library response contains relevant examples.
- iv. Provision for an exception for prescribed libraries, archives, museums and galleries to perform, play or show a sound recording or film held in their permanent collection to visitors. Many libraries hold events such as children’s story times, exhibitions and user education sessions where it would be helpful to play excerpts of sound or filmed recordings. Approaches to individual companies to allow this are often not even acknowledged. Due acknowledgement would always be given and would result in publicity for items used in this way.
- v. Provision for an exception for prescribed libraries, archives, museums and galleries to make a copy of a sound recording or film held in the permanent collection and perform, play or show it to visitors to their premises, provided that only a single copy is made, it is accompanied by a sufficient acknowledgement, and the prescribed conditions are complied

with. This would ensure the preservation of the original carrier and give the ability to play the item on a CD player, for example, rather than use outmoded equipment.

vi. Expansion of the definition of “making available to the public” by amending s30 (1A) and any other clause in which the phrase appears (including regulations and clauses relating to Publication Right) to include the availability to the public of a work held in a library, archive, museum or gallery accessible to the public. This will clarify the position of unpublished works, a number of which are held by music libraries in all sectors.

Visual Display of Works

To redefine ‘performance’ to allow the display of other classes of works, not just artistic works, so that a static visual display of a literary, dramatic or musical work is not an infringement. It is currently an infringement to ‘perform’ a literary, dramatic or musical work without permission. ‘Performance’ in this context includes ‘any mode of visual or acoustic presentation’, which could be interpreted to include simple exhibition (a basic form of visual presentation). What is required is a redefinition of ‘performance’ so that a mere static display of a literary, dramatic or musical work on a wall, table or in a display case is not an infringement. A display of this kind will no more harm a rights owner than will exhibition of an artistic work. Many libraries display printed music and recording covers to promote interest in their collections and it would be helpful to have the legality of this clarified.

Off-air recording of broadcasts

Currently only educational establishments can make off-air recordings of broadcasts. We believe that cultural institutions, including prescribed libraries and archives along with other museums and galleries, should also have an exception allowing them to generally make off-air recordings in support of their collections and legitimate non-commercial activities. At the very least they should be allowed to make, without the need for any licence, archival recordings of any broadcast of direct relevance to an item held in their collection, for example programmes concerning composers in special collections or relevant to local studies.

Disability exceptions

The Copyright [Visually Impaired Persons] Act 2002 is a welcome enhancement of the rights of visually impaired people. The provisions are, however, limited. Music is very important to many people and arguably even more so for people with disabilities, given the therapeutic nature of much musical activity. We support the views put forward by Share the Vision and request that provisions should include all people with any disability and all classes of works. People with dyslexia and learning difficulties are in particular cannot benefit from exceptions at the moment.

One aspect of the legislation not covered by the VIP scheme applies to magazines. A member who edits a Braille music magazine often wishes to include news items from music magazines. He reports that for one magazine he needs to seek permission on a case by case basis. Another magazine will only let him use, for no charge, one item per issue; the cost of using more would be prohibitive. If such magazines are not made available in alternative formats it should be possible for the information to be transcribed without penalty.

As part of an international organisation dealing with an international language, we need to ensure that more alternative formats are available by legislating to allow UK citizens to have access to overseas productions. We should also legislate to permit all alternative format materials legitimately produced in the UK to be exportable abroad. The need for standard music materials in developing countries is vast; the lack of alternative formats is therefore a huge problem. The UK could make a valuable contribution to improving the education and life prospects of people in the poorest parts of the world by making its materials available more widely.

d. Are the current exceptions adequate or in need of updating to reflect technological change?

All classes of media should be covered by same exceptions. WIPO states that: 'The reproduction right . . . and the exceptions . . . fully apply in the digital environment'. As suggested, UK law should include a statutory exception for fair use for recordings (e.g. copying onto MP3) as an equivalent to time-shifting for broadcasts. While we absolutely condemn peer-to-peer file sharing and the pirating of recordings for commercial gain, we believe the law should reflect the reality of private copying of music for personal use in this country. The public do not understand why this kind of copying is illegal and that leads to infringement. Rights holders are, understandably, nervous that increasing technology can bring about infringement, but the law needs to recognise that technology is the servant of access to information and should not be used as an excuse to curtail fair use.

e. How would you see content owners being compensated for such use?

The concept of fair use means the ability to use material without additional payment. If additional uses are judged to be fair and in the public good, no further compensation should be required, as payment will have been made for the purchase of the original work. In some countries a small levy is added to the purchase of recording media, although in practice the large companies owning the rights also make available the technology to make copies, so there is also a moral question here.

f. To what extent has technological change presented difficulties in use of copyrighted material in the field of education?

The use of technical improvements to enhance education is hampered by outdated laws. Technological change happens much more quickly than has been foreseen within current legislation, therefore provision should be put in place to try to ensure flexibility for the future. Provisions negotiated for educational establishments are not always available to public libraries (for example off-air recording), despite the increasing emphasis on lifelong learning within those libraries.

g. Are there issues concerning the archiving of material covered by copyright?

A major part of libraries' and archives' business is to preserve material for the future. All media are subject to degradation and damage and new media are particularly vulnerable as the means of using them may not be available in the future. Therefore it is vital that all classes of media can be copied for preservation purposes and to ensure that the information they contain is accessible to users. The response of the British Library is particularly helpful in this field.

We request amendment of s42 to:

- Legitimise the copying of a master copy from works (comprising all classes of copyright works including sound recordings and film) held in the library or archive's own stock to create a copy for archival purposes.
- Allow a further copy to be made from the archival copy for library stock to allow subsequent replacements due to wear and tear.
- Allow the archival and any subsequent copies to be made in any medium not just the original medium.

Copyright: digital rights management

We believe that developments in technology such as DRM systems should not be permitted to upset any further the delicate balance between rights holders and consumers. Such systems cannot differentiate between legitimate use and infringement, so at a stroke they not

only make copyright perpetual, but absolute too, eliminating all exceptions and limitations.

IAML(UK & Irl) has submitted a response to the All Party Parliamentary Internet Group on this subject and request that the views expressed in that response be taken into account.

a. Do you have a view on how the use of digital rights management technologies should be regulated?

The All Party Parliamentary Internet Group (APIG) has urged the British Library to take a lead role in the copyright and DRM debate in the UK. We support this view.

Copyright: orphan works

a. Have you experienced difficulties in identifying the owners of copyright content when seeking permission to use that content?

Members have reported difficulties in tracing composers' beneficiaries when preparing for performance in educational establishments. The very nature of performance means that the time available to seek permissions is extremely limited and may result in performances (often of rare or unknown works) being abandoned, particularly if permission is needed to prepare or copy instrumental parts. Many do not reply once they have been traced and contacted.

b. Do you have any suggestions on how this problem could be overcome?

The British Library and LACA responses gives detailed proposals which we support.

In particular we request the following provisions:

- In cases where permission for copying, or performance, is required, for a commercial or non-commercial purpose, of 'orphaned' copyright works (i.e. all classes of copyright works including sound recordings and film), whether published or unpublished, where it can be shown that after reasonable enquiry, the rights holder cannot be traced, the law should provide that the user may act as if a licence had been granted. The only actions that may be open to the rights holder are to require that the copier take out a licence from that point forward.
- The US Copyright Office Report of 31st January 2006 has recognised the major problems posed by orphaned works, including sound recordings. We urge the Government to consider undertaking a similar enquiry in the UK or encourage the European Commission to undertake one.
- Users and rights holders alike would benefit from a free publicly available voluntary register of rights holders.

Copyright: licensing of public performances

a. Have you encountered problems with the system of licensing and paying royalties to collecting societies for public performance of music and/or sound recordings?

As noted above (3.a) the system is far from simple. Libraries need to complete complicated forms in order to play a very small amount of unspecified music for special events.

b. Could the system be clarified or simplified, and if so how do you see this working?

See the library regulations section above concerning the playing of stock items in libraries and museums. The minimal playing time involved in special events has no impact on the profitability of companies, particularly as the item will already have been purchased for stock.

Other matters

Importance of case law

Any review of the complete IP framework in the UK must recognise the importance of case law. In a common law jurisdiction such as ours, statutes and case law are complementary. Points of law construed from statute alone are necessarily incomplete. Statutes do not need, and are not intended, to legislate for every conceivable circumstance, but instead rely on court-defined decisions to clarify the detail and uncertainty. Due to the diffuse and complex nature of judicial material, however, case law is often overlooked, yet this ought to be the first place to seek statutory clarification. It is absolutely imperative, therefore, that stakeholders in the IP community recognise the importance of case law as a means of statutory interpretation.

Codes of practice

Statutes and case law provide the materials which state the law with the highest authority, reflecting the wishes of parliament and the courts. In addition to these, stakeholders sometimes produce codes of practice which offer supplementary views, opinions, and advice of a practical nature in dealing with IP issues. The Music Publishers Association *Code of Fair Practice* is an example of such a code and is currently under revision. Such codes do not have the weight or authority of case law and statute, but are very useful and to be encouraged; they illustrate a wish to use self-regulation to avoid litigation. However, if they are drafted unilaterally by one sector of the community, and include more restrictions than the law as defined by statute and case law, then they have no moral or legal authority over those who have not been consulted and who have not agreed, therefore, to surrender whatever legal rights they otherwise would have. For codes of practice to have maximum efficacy and authority, therefore, it is important that they are produced not just by any one sector of the community (as it might be, rights holders, or consumers), but are the result of widespread consultation across the whole range of interested parties. Such dialogue and documentation ought to be encouraged and recognised as a potentially important tier in the IP framework.

Term of protection for other copyright works

The copyright term for pre-1989 unpublished literary, dramatic and musical works of known authorship should be made the same as the standard term (life+70), plus (if it is thought necessary) a short period for older works. The term for anonymous unpublished works should remain at 70 years since creation.

The 2039 provision for some old photographs and for unpublished works should be removed. The law currently makes unnecessarily complicated term provisions for these works, which are both difficult to understand and enforce for works which are often 'orphaned'. Removing the 2039 provision is unlikely to harm creators, most of whom will now be deceased.

Development of Copyright Law

We urge the UK Government to adopt the principles of the RSA's Adelphi Charter¹ and to seek to further the interests of the UK as a whole, including furthering the educational, cultural and human rights interests of the ordinary UK citizen and the development of UK society.

¹ www.adelphicharter.org.

We believe that copyright law development should be rigorously evidence-based and that “There must be an automatic presumption against creating new areas of intellectual property protection, extending existing privileges or extending the duration of rights.

- The burden of proof in such cases must lie on the advocates of change.
- Change must be allowed only if a rigorous analysis clearly demonstrates that it will promote people's basic rights and economic well-being.
- Throughout, there should be wide public consultation and a comprehensive, objective and transparent assessment of public benefits and detriments.”

We have seen and support the submissions from the British Library, the Libraries and Archives Copyright Alliance (LACA), SCONUL, the National Archives, Share the Vision, The National Council on Archives and the Centre for the History and Analysis for Recorded Music (CHARM).

IAML(UK & Irl) is always willing to assist with relevant inquiries and can call on colleagues throughout Europe to add their expertise to discussions for the benefit of all citizens.

IAML(UK & Irl)
April 2006