

AI Law and Policy

Legal Considerations Involving Artificial Intelligence

UK's Collective Licensing Initiative Aims to Harmonize AI and Copyright Law



By Samuel Cohen on May 6, 2025

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In a significant move to address the tension between copyright and generative artificial intelligence (AI), the UK's Copyright Licensing Agency (CLA), Authors' Licensing and Collecting Society (ALCS), and Publishers' Licensing Services (PLS) have announced plans to launch a collective licensing framework for AI training. The opt-in license would allow AI developers to use text-based published works—such as books, journals, and magazines—for training, fine-tuning, and retrieval-augmented generation (RAG) while ensuring that creators are compensated. The license is expected to roll out in Q3 2025, following further consultation with publishers.

The UK government's consultation "Copyright and Artificial Intelligence" **acknowledged** that current UK copyright law leaves both rights holders and AI developers navigating uncertainty. It proposed two main solutions: (1) strengthened rights reservation mechanisms and (2) a fallback copyright exception for AI training where rights were not reserved. However, rights holders strongly opposed a "catch-all" exception, arguing it would erode transparency and remuneration. Their opposition helped catalyze the development of this licensing framework as a market-based alternative.

The framework **is being built** collaboratively by CLA, ALCS (representing authors), and PLS (representing publishers). CLA—already the UK's recognized collective management organization for text content—would administer the license, collecting and distributing fees to right holders after operational costs. It would cover a broad range of text-based published works under CLA's mandate, streamlining permissions for AI developers where individual negotiations would be impractical. Rights holders would affirmatively opt in by registering works, while unregistered works would remain outside the license's scope. This would apparently avoid the "opt-out" burden creators criticized in the government's exception proposal, instead requiring affirmative consent to participate.

Importantly, the proposed collective license is intended to complement, not replace, direct bespoke licensing deals between large publishers or rights holders and AI firms. It provides an accessible fallback particularly for smaller creators and independent publishers who may otherwise struggle to negotiate individually.

Exact compensation models are still under negotiation but will aim to balance affordability for AI developers against fair, sustainable remuneration for creators. License fees collected will be allocated among ALCS and PLS members based on established distribution rules.

The framework is accompanied by the development of a national rights reservation registry, intended to facilitate machine-readable licensing metadata and help signal licensing preferences at scale. Licensees would also be subject to robust transparency requirements, including reporting on the works used, methods of content acquisition, and downstream uses, with the ultimate goal of reinforcing trust between the creative industries and AI developers.

Although UK-focused, the licensing framework **is being designed** with international interoperability in mind, offering access to licensed content to AI developers worldwide, including US-based firms. If successful, it could serve as a model for future cross-border AI licensing solutions.

The UK's proposed collective licensing framework represents a pragmatic approach to reconciling the needs of AI innovation with the requirements of copyright law. While the implementation process is likely to raise novel challenges, the initiative is designed to provide voluntary, transparent, and scalable alternative to statutory exceptions in the UK; protecting the economic interests of creators while enabling responsible AI development. If successful, it may offer valuable insights for other jurisdictions seeking to balance technological advancement with the protection of creative rights.

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