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**THE HONG KONG REPROGRAPHIC RIGHTS LICENSING SOCIETY'S VIEW ON THE PUBLIC
CONSULTATION PAPER ENTITLED "UPDATING HONG KONG'S COPYRIGHT REGIME" FROM
THE COMMERCE AND ECONOMIC DEVELOPMENT BUREAU
("CONSULTATION PAPER")**

The Hong Kong Reprographic Rights Licensing Society (**HKRRLS**) notes that the Hong Kong Government launched a three-month public consultation on updating Hong Kong's copyright regime on 24 November 2021, and appreciates this opportunity to express its views on the proposals and issues set out in the Consultation Paper on Updating Hong Kong's Copyright Regime (**Consultation Paper**).

Briefly, HKRRLS was established in 1995 by Hong Kong authors and publishers. It is one of the six licensing bodies registered with the Copyright Licensing Bodies Registry in Hong Kong, granting licences to the public, including but not limited to primary and secondary schools, tertiary institutions, various government departments, public institutions, commercial organisations, associations, libraries, photocopying shops, to use the copyrighted works of its represented authors and publishers. It represents millions of publications published in Hong Kong and overseas, via its affiliation with the International Federation of Reproduction Rights Organisations. HKRRLS aims to protect the intellectual property rights of its represented authors and publishers and to raise public awareness of copyright and collective management organisations.

At the outset, HKRRLS welcomes and supports the updating of Hong Kong's copyright regime to provide adequate safeguards to protect the legitimate interests of copyright owners in the modern digital world, which will in turn encourage creation and innovation for the benefit of the general Hong Kong public and economy. HKRRLS considers the revival of the uncompleted amendment exercise of the Copyright Ordinance in 2014 as a long overdue and necessary step for Hong Kong to keep up with rapid societal changes and digital transformation and advancement in the past decade and align with the copyright regime and practices adopted in foreign jurisdictions in this regard.

Subject to the views specifically expressed below, we urge for an update to Hong Kong's copyright regime by introducing a new amendment bill to the Copyright Ordinance without

further delay, and based on the proposed amendments in the Copyright (Amendment) Bill 2014 (**2014 Bill**).

As regards the specific issues raised in the Consultation Paper, HKRRLS is generally in agreement with the Government's proposal to introduce the new "communication right" and to retain the existing approach not to interfere with commercial agreements which may exclude the applicability of certain statutory copyright exceptions:-

1. Communication right

In particular, HKRRLS supports and agrees with the Government's proposal to introduce a new technology-neutral exclusive right for copyright owners to communicate their works to the public through any mode of electronic transmission, as per the wording proposed in section 28A of the 2014 Bill. Given the rapid development in technology and the increasing use of technology and digital means by the general Hong Kong public to access, view and disseminate information and materials, which has been exacerbated in recent times due to the spread of COVID-19 and the resulting social distancing measures, HKRRLS considers it appropriate and critical to broaden the scope of copyright owners' rights and not limit such exclusive rights to specific means of technology or transmission. Currently, the Copyright Ordinance specifies the exclusive rights for copyright owners to broadcast a work to the public or to include the work in a cable programme service (section 28 of the Copyright Ordinance) and to make a work available to the public (section 26 of the Copyright Ordinance). Given the increasing means and modes of disseminating, transmitting and sharing information electronically and online, the existing exclusive rights do not provide adequate protection to copyright owners as third party users are allowed to use other means or modes of communication or transmission that do not fall within the scope of these specified acts to access or disseminate copyrighted works. The current wording also created uncertainties as to whether certain newer modes of technology or transmission would fall within these descriptions. In light of the increasing prevalence of distance learning and online education and sharing of knowledge and content, the proposed communication right as worded in section 28A of the 2014 Bill will also provide greater certainty to copyright owners as well as to the general public as to the extent of their rights (or limitations) to use copyrighted works. HKRRLS further notes that such a "communication right" has already been adopted into the copyright regime in foreign jurisdictions many years ago such as the United Kingdom, the EU, Australia, Canada, Singapore, and New Zealand. We believe it is necessary for Hong Kong to align with the global practice.

HKRRLS contemplates that the upcoming amendment bill may, similarly to the proposed wording in a new section 28(4)-(6), limit the scope of the communication right by carving out some exclusions, including that a person does not communicate a work to the public if (a) that person merely provides facilities for enabling or facilitating the communication of a work to the public or (b) where that person does not determine the content of the communication (i.e. only because he/she has merely taken one or more steps for the purpose of gaining access to what is made available by someone else in the communication or receiving the electronic transmission of which the communication consists).

HKRRLS understands the necessity to strike a balance between protecting copyright owners' rights in respect of their copyrighted works and the interests of the public to reasonably use the copyrighted works, as well as the interest of innocent third parties who are for example, merely providing facilities, without more. In this connection, whilst HKRRLS would prefer

exceptions (a) and (b) to be narrowed so that users and/or platforms that deliberately facilitate infringing acts of content creators (e.g. pirate sharing platforms) could still be held liable, if it is made clear that notwithstanding the exception, copyright owners can, depending on the relevant circumstances of the case, commence legal actions against any such third party for authorising any acts of copyright infringement under section 22(2) of the Copyright Ordinance and/or as a joint tortfeasor of any infringing acts (e.g. if a person uploads a hyperlink containing an unauthorised copy of a published work with the intention of facilitating or encouraging other users to download and use the same without the copyright owner's authorisation). Further, for such service providers, it should be made clear that they will still be subject to the "safe harbour" provisions in that if they have been notified of infringing materials on their website and they do not take down or take steps in accordance with the safe harbour, they may still be held liable. Finally for exception (b), we suggest a further exception should be included such that if even if the person does not determine the content, if the person takes steps to share and make the content widely available to a prejudicial extent, or if the person shares the content for non-commercial purposes, the person should still be considered as having "communicated" the work. In fact, we note that the proposed exceptions above are not available in the UK and indeed in the EU case of *Stichting Brein v. Jack Frederik Wullems (C-527/15)*, it was held that the defendant's act of selling multimedia devices that allowed users to access and stream content from third party websites which were unauthorised (and hence it did not itself determine the contents of the communication but clearly knew of and was facilitating infringement by its users) constituted an act of "communicating". The communication right should not unnecessarily erode the scope of protection provided to copyright owners to prevent others from using copyrighted works without authorisation and therefore, the carve-out to the communication right should be limited only to the extent proposed in section 28(4)-(6) of the 2014 Bill to allow ordinary everyday users to access or receive content already uploaded on the internet.

2. Contract override

HKRRLS also agrees with the Government's proposal to maintain a non-interference approach to contractual arrangements between copyright owners. We also agree with the reasons set out in the Consultation Paper for not introducing statutory restrictions on contract override. In other words, HKRRLS believes that it is appropriate to continue to allow parties to use contracts such as licensing agreements to exclude, restrict or limit the application of statutory copyright exceptions, as this is consistent with the long established and core principle of freedom of contract under Hong Kong laws, and the interests of copyright users are adequately protected through the availability of other existing legal mechanisms such as existing consumer protection legislation and existing provisions in the Copyright Ordinance that empower the Copyright Tribunal to scrutinise the terms of a licensing scheme and determine whether the licensing scheme is reasonable.

In addition, copyright owners derive rewards and compensation for their skills and creativity from revenue from the exploitation of their copyrighted works and licence agreements are important source of such revenue, including for many of the authors and publishers that HKRRLS represents. Against this background, retaining the non-interference approach will be in the interests of both the licensors and the licensees as it will provide greater flexibility to both copyright owners and licensees to negotiate the terms of a licence agreement, as whether or not a licensor and/or a licensee may wish to allow or restrict the applicability of certain copyright exceptions will often depend on the specific circumstances, e.g. the nature of the license, the types of works to be used by the licensee, the permitted acts under the license and/or the agreed license fee to be paid by the licensee.

Moreover, the non-interference approach to contractual arrangements has always been in place in Hong Kong and there is no evidence suggesting that it has created any prejudice or injustice against licensees.

3. Exceptions to copyright infringement

In addition to the specific issues raised in the Consultation Paper, if the upcoming amendment bill is largely based on the 2014 Bill, we have identified that, amongst others, the following sections in the Copyright Ordinance that provide for copyright exceptions in relation to use of copyrighted works for education or educational purposes will be subject to amendment:-

- Section 41A: Fair dealing for purposes of giving or receiving instructions;
- Section 41: Things done for purposes of instruction or examination;
- Section 44: Recording, copying or communication by educational establishment: broadcasts or cable programmes;
- Section 45: Copying or communication by educational establishments or pupils: passages or extracts from published works;
- Section 245: Recording, copying or communication by educational establishments: broadcasts or cable programmes; and
- Section 245A: Copying or communication by educational establishments: published sound recordings or films.

3.1 Permitted use of copyrighted works by educational establishments

Currently, sections 41A, 44, 45 and 245 of the Copyright Ordinance permits specified use of copyrighted works by "educational establishments".

"Educational establishment" is currently defined in section 195 of the Copyright Ordinance and further specified in Schedule 1 to include the following:-

- schools entirely maintained or controlled by the Government;
- schools which are registered or provisionally registered under the Education Ordinance;
- post secondary colleges registered under the Post Secondary Colleges Ordinance;
- Lingnan University, Education University of Hong Kong, University of Hong Kong, Hong Kong Polytechnic University, Chinese University of Hong Kong, Hong Kong Baptist University, City University of Hong Kong, Hong Kong University of Science and Technology, Hong Kong Academy for Performing Arts, Hong Kong Metropolitan University; and

- any industrial training centre or skills centre or technical college or institute as defined in the Vocational Training Council Ordinance

(Specified Educational Establishment Limitation).

In regards to schools which are registered or provisionally registered under the Education Ordinance, section 10(1) of the Education Ordinance provides that *“every school shall be registered or provisionally registered”* and “school” is defined under section 3(1) of the Education Ordinance to mean *“an institution, organisation or establishment which provides for 20 or more persons during any one day or 8 or more persons at any one time, any nursery, kindergarten, primary, secondary or post secondary education or any other educational course by any means, including correspondence delivered by hand or through the postal services”*.

Apart from the Specified Educational Establishment Limitation, under sections 41A and 45, the copyrighted work can only be used in specified courses of study provided by the specified educational establishments. “Specified course of study” is specifically defined to mean:-

- a course of study which is provided for the delivery of a curriculum developed on the basis of curriculum guidelines issued or endorsed by the Curriculum Development Council; or
- a course of study which consists of an assessment of a pupil’s competence in the area covered by the course, and leads to an award of a qualification.

HKRRLS notes that private tutorials centres are prevalent in Hong Kong and many if not most of them are commercial and money making. Some of them charge substantial amounts of fees. As private tutorial centres are required to be registered under the Education Ordinance and the courses offered by private tutorial centres may also fulfil this specified course of study requirement if the copyrighted work is used to deliver tutoring courses in relation to for example (but without limitation to), the Hong Kong Diploma of Secondary Education (HKDSE), the International Baccalaureate (IB) Diploma, the General Certificate of Education (GCE) A-level or AS-level.

By virtue of these provisions, many private tutorial centres that are operated as commercial entities for profit would seem to meet the requirements of section 3(1) of the Education Ordinance and hence will also fall within the category of “schools which are registered or provisionally registered under the Education Ordinance”. Accordingly, under sections 41A, 44, 45, 245 and the newly proposed 245A of the Copyright Ordinance, such tutorial centres can take advantage of these copyright exceptions. If the proposed amendments set out in the 2014 Bill are adopted, the copyright exception in section 45 will be substantially expanded in scope as it will allow any “educational establishment” (or person on behalf of an educational establishment) to not only make reprographic copies, but to make *any type* of copies, of artistic works, passages from published literary, dramatic or musical works, or extracts from published sound recordings or films.

In addition, the proposed amendments to sections 44, 45 and 245 and the introduction of section 245A will further allow a person authorised by an educational establishment to generally “communicate” a copy of the copyrighted work to an authorised recipient, which will widen the scope of the means of modes in which a person may disseminate copyrighted works.

This will include uploading and sharing online and on their platforms which can be shared with their students and tutors.

Against this backdrop and the proposed expansion in the scope of the copyright exceptions for educational use or purposes, HKRRLS and the authors and publishers it represents find it extremely problematic and unfair for the definition of the “educational establishment” to include private tutorial centres which are operated commercially and for profit, of which the nature and purpose are completely different from the other categories of educational establishments such as universities and kindergarten, primary, secondary and post-secondary schools, of which the objectives are primarily providing education. By including private tutorial centres in the definition, this means that the expanded exceptions relating to educational establishments equally apply to these purely commercial and profit-making entities. We strongly oppose to allowing such entities to fall within the exception.

Firstly, these private tutorial centres are of a different nature from the other schools and institutions listed in Schedule 1 of the Copyright Ordinance – the latter provide the core and mainstream education to students while the former provide unnecessary and purely voluntary supplemental education on top of what has been taught by the students’ schools. Whilst HKRRLS understands the policy reasons and rationale behind the copyright exceptions to support teaching and education in Hong Kong which is an essential function of society, and that use of copyrighted material is integral in education, these reasons and rationale are inapplicable to private tutorial centres or institutions, which are operated as commercial businesses and their services are often provided at a substantial fee. Accordingly, there is no reason or justification to allow such private tutorial centres or other establishments offering supplemental tuition or courses to benefit from the copyright exceptions and to deprive copyright owners from legitimately exploiting their copyrighted works (e.g. by collecting licence fees) when such tutorial centres or establishments themselves are commercially operated to generate a profit, and can certainly afford to pay a licence fee for using copyrighted work – and is no different from any other commercial operations/companies, which do not have any copyright exceptions.

This view has already been adopted in Singapore, where the definition of “educational institutions” in section 83 of the Copyright Act 2021 requires those institutions to be “not for profit”. Thus, under the Singaporean copyright regime, the exceptions allowing use of copyrighted works by “educational institutions” will not be applicable to commercial/ for-profit institutions such as private tutorial centres or even private schools. Similarly in the United Kingdom, section 36(1) of the Copyright, Designs and Patents Act 1988 provides that an educational establishment does not infringe copyright in the work by copying extracts of a relevant work *provided* that the copy is made for the purpose of instruction for a *non-commercial purpose* and the copy is accompanied by a sufficient acknowledgement.

Therefore, HKRRLS strongly urges the Government to reconsider the definition of “educational establishment” under the Copyright Ordinance to exclude private tutorial centres or other privately operated establishments or institutions that offer courses to supplement coursework already being taught at mainstream schools.

Alternatively, an additional qualification should be imposed to the copyright exceptions for education such that any use of copyrighted works for the purpose of giving or receiving instructions, or copying by or on behalf of any educational establishment, can only be

permitted if such copying or use is for a “non-commercial purpose” so as to make such exceptions inapplicable for profit-making private tutorial centres.

3.2 Further safeguards required for copyright exceptions for educational use or purposes

If the proposed amendments in the 2014 Bill are adopted, as discussed above, it is clear that the scope of the copyright exceptions for use of copyrighted works for educational purposes will be greatly expanded. Whilst HKRRLS understands the need to expand the exceptions to reflect the digital transformation and modernisation of education, including the increasing prevalence of online teaching and use of the internet to give instructions and/or provide coursework and other educational materials, HKRRLS is of the view that further safeguards need to be adopted to adequately protect copyright owners' rights including their ability to protect and control free access to and exploitation of their works without reasonable compensation to the owners.

We are aware that other jurisdictions such as Singapore and the United Kingdom impose a quantitative limitation on the amount of work that can be copied. For example, under section 36(5) of the UK Copyright, Designs and Patents Act 1988, an educational establishment may not copy more than 5% of a work in any period of 12 months, and under the Singaporean Copyright Act 2021, section 197 also specifies maximum pages or proportion of a work that may be copied or communicated.

HKRRLS agrees with the Government's proposals in the 2014 Bill to not introduce such quantitative limitations to the copyright exceptions, given that there are already existing qualitative limitations for example, section 45 of the Copyright Ordinance which only allows educational establishments to copy a “reasonable extent” of a copyrighted work, which is more flexible and takes into account the quality and importance of, and not just the quantity of, the work taken. HKRRLS believes that it is preferable to retain this existing “reasonable extent” threshold to maximise flexibility and we anticipate that it will be difficult for copyright owners from different industries (e.g. authors and publishers as opposed to stakeholders within the film industry) to reach a unanimous consensus on any such figures, which may further stall the reform of Hong Kong's copyright regime. We are also very concerned that the adoption of any specific figures may create confusion amongst the public and users of copyrighted materials as they may be under the mistaken impression that any use of copyrighted materials is permitted under the copyright exceptions for educational use so long as the amount copied or used falls below the specified maximum when this is not the case at all as the applicability of these exceptions are also subject to further qualifications (e.g. under section 45 of the Copyright Ordinance, the exception is not applicable if there is a license under a licensing scheme authorising the copying or communication of a copyrighted work by the educational establishments).

On the other hand, whilst HKRRLS does not consider it necessary to impose specific quantitative limits on the amount of work that can be copied or otherwise used or dealt with for educational purposes, further parameters ought to be introduced to provide copyright owners with more control over free access to their works. In particular, it is common for educational establishments (in particular for primary and secondary schools) to create or use authorial works which are compiled from various published works. Clearly, the use of numerous works owned by one copyright owner in an authorial work can adversely impact the

legitimate interest and revenue that the copyright owner may have otherwise generated through licensing to compensate for his/her hard work. Thus, to minimise this risk, the exceptions ought to clarify that such authorial works or reference materials cannot contain more than one copyrighted work owned by the same copyright owner. This has already been adopted in the Singapore Copyright Act 2021, in which section 203 permits the inclusion of “authorial work”¹ in collections used by educational institutions only if amongst others, the collection of work used by the educational institution (e.g. a course pack) does not contain in total, more than one other extract from any other copyrighted work by the same author.² We believe that a similar approach should be adopted in Hong Kong to clarify what is meant by copying to a “reasonable extent” under sections 41 and 45 of the Copyright Ordinance in this context.

¹ Defined under section 9 of the Singapore Copyright Act 2021 to mean a “literary, dramatic, musical or an artistic work.”

² Section 203 of the Singapore Copyright Act 2021 provides the following:-

(1) If the conditions in subsection (2) are met, it is a permitted use to include a short extract of an authorial work in a collection of authorial works.

(2) The conditions are —

- (a) the work has been published;
- (b) the work was not published for the purpose of being used by educational institutions;
- (c) the collection is contained in a book, sound recording or film;
- (d) the collection is intended for use by educational institutions and this intention is described —
 - (i) in the book;
 - (ii) on the label or container of each copy of the recording; or
 - (iii) in the film;
- (e) the work is sufficiently acknowledged; and
- (f) the collection and any similar recent collection do not contain, in total, more than one other extract from —
 - (i) any other authorial work (being a copyright work) by the same author; or
 - (ii) any adaptation of a literary, dramatic or musical work (being a copyright work) by the same author.

(3) For the purposes of this section —

- (a) 2 authorial works (including adaptations) are taken to have the same author if the same person is —
 - (i) the author or an author of both works; or
 - (ii) the author of one work and an author of the other work; and
- (b) “similar recent collection” means a collection that is —
 - (i) published by the same publisher that published the 15 collection mentioned in subsection (1);
 - (ii) published in the 5 years immediately before the publication of the collection mentioned in subsection (1);
 - (iii) intended for use by educational institutions; and
 - (iv) otherwise similar to the collection mentioned in subsection (1).

Based on the existing wording of, and the proposed wording of the amendments in the 2014 Bill to, sections 41A, 44, 45, 245 and 245A of the Copyright Ordinance, we are aware that there are already some parameters imposed on the applicability of the copyright exceptions. We appreciate these limitations as they seek to, for example, limit the circulation of copyrighted works to the wider general public by imposing obligations on the educational establishments to ensure that the copyrighted works are only communicated to authorised recipients (e.g. students), or limit the applicability of the exceptions to circumstances where there is no licensing scheme.

Nevertheless, in light of the proposed introduction of the communication right which will in turn significantly expand the scope of the exceptions for educational use (i.e. by allowing any mode or means of dissemination of copyrighted materials by electronic transmission), HKRRLS considers it necessary to clarify the conditions or parameters in which a user can be permitted to use copyrighted works to mitigate the risk of unauthorised and widespread circulation of copyrighted materials, especially online. In light of the current digital landscape, and the increasing use of digital materials to facilitate learning, license fees for online content provide an important additional source of revenue for copyright owners. Given the free flow of information on the internet and the ease of uploading, sharing and downloading materials online, HKRRLS is very concerned that this will encourage the public, including educational establishments, to make use of materials online, even if such materials were uploaded without the copyright owner's authorisation, thus adversely impacting the legitimate revenue that copyright owners would and should otherwise obtain from licensing their works.

To mitigate this risk, the upcoming amendment bill ought to provide that where a copyrighted work has been copied online by an educational establishment and/or for the purpose of giving or receiving instructions, the following conditions must be met:-

- (a) the user must acknowledge the source of the online work;
- (b) the communication of the work or a copy of the work must be done on a network that is operated or controlled by an educational establishment to which access is limited to the students or staff of that institution or a prescribed platform; and
- (c) if the work has been made available in infringement of others' copyright and the educational establishment does not know and is not notified of this fact when it copies/communicates the work for educational purpose; but if the educational establishment is subsequently notified, the education establishment must stop copying/communicating the work and must take reasonable steps to prevent the public and/or authorised recipients (as defined in the Copyright Ordinance) from further accessing the work insofar as the work has been communicated to the public and/or authorised recipients.

We note that Singapore has already included a similar provision in section 204 of its Copyright Act 2021.³

³ Section 204 of the Singapore Copyright Act 2021 provides the following:-

- (1) If the conditions in subsection (2) are met, the following acts are permitted uses:
- (a) making a copy of a work or a recording of a protected performance;
 - (b) communicating a work or a recording of a protected performance to the public;
 - (c) making an adaptation of a literary, dramatic or musical work;
 - (d) recording a protected performance live.
- (2) The conditions are —
- (a) the work, recording or performance was accessed by the person (X) using the Internet;
 - (b) when X accessed the work, recording or performance, it was generally accessible by the public free of charge using the Internet;

Illustrations

(a) A work, recording or performance is not generally accessible to the public if it is accessible only for a limited period that cannot be renewed or extended (for example, under a one-time trial subscription)

(b) A work, recording or performance is not generally accessible to the public if it is accessible only by circumventing an access control measure in circumstances that constitute an infringement of Division 4 of Part 7 (protection of technological measures).

(c) A work, recording or performance is not accessible free of charge if it is only accessible under a paid subscription, even if not all users of the subscription paid for it.

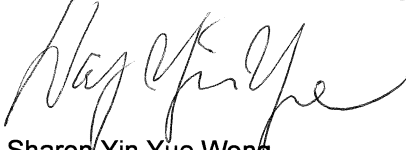
- (c) either —
- (i) X is a public officer or an officer of a public body, and the act is done for the purpose of developing or implementing a curriculum for an educational institution; or
 - (ii) X is a student of or a member of the staff of an educational institution, and the act is done for the educational purposes of that institution;
- (d) X cites (or causes to be cited) the Internet source from which the work, recording or performance was accessed and the date on which the source was accessed;
- (e) X gives (or causes to be given) a sufficient acknowledgment of the work, recording or performance, if and to the extent that the necessary information is available from the Internet source;
- (f) in the case of subsection (1)(b) — the communication is done on —
- (i) a network —
 - (A) that is operated or controlled by an educational institution; and
 - (B) to which access is limited to the students or staff of that institution; or
 - (ii) a prescribed platform; and
- (g) if the work, recording or performance has been made available on the Internet in circumstances that constitute a rights infringement —
- (i) X does not know and is not notified of this fact when X does the acts mentioned in subsection (1); and
 - (ii) if X is subsequently notified of this fact —
 - (A) X stops doing any of the acts mentioned in subsection (1); and
 - (B) insofar as the work or recording has been communicated to the public, X takes reasonable steps to prevent the public from further accessing the work, recording or performance.
- (3) Without limiting the expression “educational purposes” elsewhere in this Act, for the purposes of this section, the following are taken to be acts done for educational purposes:
- (a) collaborative research;
 - (b) acts done for the purposes of teaching or study;
 - (c) organising or participating in an exhibition or a competition (whether within an educational institution or at the national or international level).

4. Conclusion

In conclusion, HKRRLS welcomes the Government's initiative and effort into updating Hong Kong's copyright regime which is fundamental for Hong Kong to keep up with the international trend and to adequately protect copyright owners' interests in the context of ongoing digital transformation. In particular, HKRRLS agrees with the introduction of the communication right and the preservation of the non-interference approach to the use of contract to exclude, restrict or limit the statutory copyright exceptions. HKRRLS' main concerns are in relation to the expanded educational exceptions and the inclusion of for-profit businesses such as private tutorial centres to take advantage of the exceptions, which HKRRLS sincerely hopes that the Government will acknowledge and address by adopting additional parameters as proposed above to adequately safeguard the interest of the copyright owners that HKRRLS represents.

Please feel free to contact the undersigned if you have any questions or wish to discuss.

Yours sincerely,
For and on behalf of
The Hong Kong Reprographic Rights Licensing Society



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