To the Chairman of Parliament, R.Bulgaria: Ms Tsetska Tsacheva.

Committee on Culture, Civil Society and Media: Ms Daniela Petrova.

Minister of Culture, R. Bulgaria: Mr Vezhdi Rashidov.

Dear Ladies and Gentlemen,

I am addressing you on behalf of the European Federation of Cinematographers IMAGO in connection with the proposal for withdrawing the authors' rights of cinematographers of audio-visual works in Bulgaria and the relevant legislative basis.

Bulgaria, along with the Scandinavian countries has been a cultural Model amongst a legislative jungle to which our thirty European Societies and fifteen worldwide has long had admiration and respect.

Heretofore, we considered that the Bulgarian Law on Copyright was a text, which reflected sufficiently the role of cinematographers, recognizing them as co-authors together with directors and screenwriters of audio-visual works. This corresponded adequately to the powerful role of the image in creating the films of today and tomorrow.

Any amendments to your law, which would place cinematographers as authors in unequal position with respect to directors and screenwriters, as well as in violation of Directive 2006/116/EC of the European Parliament and of the Council, would take you away from the philosophy of the European Law, which has a special attitude to the authors of audio-visual works.

We hope that you will remain a positive example in this field of Community legislation by preserving the authors' rights of cinematographers such as they are in the current law and that I may long continue to write holding Bulgaria proudly as the ideal legislation to which all of Europe should be striving to achieve.

Sincerely,

Nigel Walters BSC

President of IMAGO



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