



Artificial Intelligence Impacts on Copyright Law

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ABSTRACT

Artificial Intelligence (AI) has emerged as a transformative technology capable of generating text, images, music, software code, and other creative works. While AI enhances innovation and productivity, it presents significant challenges to traditional copyright law frameworks, which are built upon the principle of human authorship. This research paper examines the legal, ethical, and economic implications of AI-generated content on copyright law. It explores issues such as authorship, ownership, training data usage, fair use doctrine, derivative works, liability concerns, and international legal approaches. The study concludes that copyright systems worldwide must evolve to balance innovation with the protection of human creators' rights. The purpose of this research paper is to explore the legal implications of AI for copyright law in the Indian context. Specifically, this paper will examine the copyright ability of AI-generated works, liability for infringement by AI, and fair use of copyrighted material by AI. The paper will also consider the international legal framework for AI and copyright law and provide recommendations for policymakers and stakeholders in India's creative industries. Ultimately, this paper aims to contribute to a deeper understanding of the legal and policy issues surrounding AI and copyright law in India and to inform the ongoing debate on this important topic.

Keywords:- Artificial Intelligence, Copyright Law, AI-generated content, Authorship, Fair Use, Intellectual Property, Digital Rights.

1.INTRODUCTION

In 1956, the Dartmouth Conference, convened by John McCarthy and others, birthed the term "Artificial Intelligence" and set forth its ambitious goal: to make machines simulate aspects of human intelligence (McCorduck, 2004). Currently, there is no established legal definition for the term "artificial intelligence." The phrase "artificial intelligence" refers to "the ability of machines to do things that people would say require intelligence". In 1990, Ray Kurzweil defined AI as "the science of making computers do things that require intelligence when done by humans". Artificial Intelligence (AI) is commonly described as the capacity of computers to carry out cognitive functions such as thinking, perceiving, learning, problem-solving, and decision-making. According to futurist Russ Pearlman, the primary objectives of AI encompass reasoning, knowledge acquisition, planning, learning, natural language processing (such as comprehension and verbal communication), perception, and the capability to handle and navigate things. Artificial Intelligence (AI), initially conceptualized in the 1950s, is a branch of computer science that seeks to create machines capable of performing tasks requiring human-like intelligence (Russell & Norvig, 2010). Over the years, Such as, AI assists in diagnosing diseases, personalizing treatments, and predicting patient outcomes. In finance, algorithms analyze market trends, detect fraud, and automate trading. Similarly, transportation has witnessed a revolution with self-driving cars, and in entertainment, AI generates music, and art, and even writes scripts (McCosker & Wilken, 2020). The proliferation of AI in content creation has ushered in novel challenges for copyright law. Traditionally, copyright law has been premised on protecting human creativity, and granting rights to authors for their original works (Goldstein & Reese, 2018). As AI systems produce music, art, literature, and other creative outputs, questions arise about the applicability of these laws to machine generated content. Particularly, the central issue is authorship. For a work to be copyrightable, it generally must have a human author (Towse, 2019). AI, being non-human, challenges this paradigm. Some jurisdictions, like the U.S., don't recognize non-human authorship, leaving AI-generated works in a legal gray zone (Bridy, 2016). Conversely, countries like the UK have provisions for computer generated works, though the human "operator" is considered the author (Copyright, Designs and Patents Act, 1988). Another quandary is originality. While AI can produce unique outputs, these are often based on patterns learned from existing human-made content. This raises concerns about potential infringements and the originality threshold for protection. Moreover, the use of AI tools in content analysis, such as for plagiarism detection or data mining, brings up issues of fair use and derivative works.



2.HISTORICAL BACKGROUND OF COPYRIGHT LAW

Copyright law has its roots in the Renaissance, with the rise of the printing press. The first recorded copyright grant was in England, in 1557, when the Crown gave the Stationers' Company a monopoly over printing (Patterson, 1968). However, it was primarily a censorship measure rather than a protection of authors' rights.

The modern concept of copyright emerged in the 18th century. The British Statute of Anne (1710) is commonly recognized as the first copyright law that primarily focused on the rights of authors, granting them exclusive rights to their works for a limited time, after which works entered the public domain (Rose, 1993).

Following three principles established by the Statute of Anne (1710) became foundational:

- i.** Copyright protects the expression of ideas, not the ideas themselves.
- ii.** Copyright doesn't last indefinitely. This balance ensures authors are incentivized while enabling societal benefit from the free use of works post-protection.
- iii.** Copyright holders have exclusive rights, like reproduction, distribution, and adaptation of their works.

Artificial Intelligence (AI): A Beginning of a New Journey

As stated earlier, John McCarthy coined the term "Artificial Intelligence" in 1956 (McCorduck, 2004). However, Artificial Intelligence (AI) traces its roots back to antiquity, with myths of artificial beings like the Greek automaton Talos. However, the formal inception of AI as a scientific discipline occurred in the mid-20th century. Initially, AI research focused on symbolic methods and rule-based systems. These "expert systems" encapsulated human knowledge in predefined rules, aiding decision-making in domains like medicine. However, their limited adaptability became evident, and by the 1980s, a shift towards learning from data—machine learning—gained momentum. The 1990s and 2000s witnessed the growth of algorithms that could learn from vast datasets. Techniques like neural networks, inspired by the human brain's structure, laid the groundwork for deep learning. This approach, coupled with increased computational power and data availability, led to significant AI breakthroughs in 2010 .

Impact of Artificial Intelligence on Copyright Law

Artificial Intelligence (AI) challenges the core principles of copyright law in several profound ways. Such as copyright law typically protects works that are original and a product of human creativity. AI-generated content, which is derived from patterns in existing works, blurs the line between derivative and original creation. Further, traditional copyright frameworks center around human authors. With AI-generating content, it's difficult to choose the "author" among AI, the programmer, the user, or the entity that owns the AI (Abbott, 2018). While copyright law often requires a work to be "fixed" in a tangible medium, AI can produce dynamic content that changes over time. Another challenge is duration, as copyright protections exist for a limited time after the author's death. For AI created content, determining a timeframe for copyright protection becomes challenging. Lastly, moral rights, which protect personal and reputational aspects of a work for its creator, become ambiguous in the context of AI, which lacks intent or emotion (Deltorn & Macrez, 2019). *Naruto v. Slater* (2016) is often cited in AI copyright discussions, a macaque monkey named Naruto took a selfie using a camera owned by British photographer David Slater.

The Complexities of Copyright Law in the Era of Artificial Intelligence

The incorporation of artificial intelligence (AI) into the creative sphere offers considerable issues for modern copyright law, which is built on the assumption that copyright protection is solely available to human artists. The question of authorship and the applicability of copyright to AI-generated content becomes more complicated when AI learns to develop works without direct human input (Ramalho, 2017). Furthermore, the ease with which AI can copy and remix content at scale presents law with unprecedented hurdles, potentially forcing a re-assessment of fair use and the extent of derivative works. Another issue is a lack of uniformity between jurisdictions, which results from the prospect of different governments regulating AI and copyright differently. To continue to encourage innovation while equitably preserving the rights of all participants in the creative process, the law must be developed to meet the particular repercussions of AI's creative powers.

Artificial Intelligence and Human Creativity

The intersection of Artificial Intelligence (AI) and human creativity is both exhilarating and fraught with challenges. As AI begins to produce art, music, literature, and other creative outputs, it prompts us to re-evaluate the nature of creativity and its uniquely human attributes (McCosker & Wilken, 2020). AI can generate music, visual arts, or textual content by analyzing vast datasets of existing human-made content. While these creations can be novel, they derive from patterns in pre-existing works. Human creativity is often linked to emotions, experiences, and intent. AI-generated content, while technically proficient, might lack the depth, emotion, or cultural context that human artists infuse into their works (Boden, 2019).

The proliferation of AI in creative industries can disrupt traditional economic models. If AI can produce content rapidly and inexpensively, it could challenge the livelihoods of human artists and creators. Moreover, as AI tools become more accessible, there's potential for misuse. Plagiarism, copyright infringements, or the creation



of misleading or harmful content can become pressing issues (Bridy, 2016). Furthermore, as AI enters the realm of creativity, the role and identity of the human artist are under scrutiny. Are they the creator, curator, or collaborator when using AI tools? This blurring of lines poses philosophical challenges about the essence of human creative expression. While AI offers immense potential to augment human creativity and open new avenues of artistic exploration, it also presents challenges that force society to reflect on the nature of creativity, authenticity, and the role of the artist in the digital age. Artificial Intelligence has significantly reshaped creative industries by enabling machines to generate original-looking content. Tools such as generative AI systems can compose music, create artwork, write articles, and develop software code. However, traditional copyright law was designed to protect works created by human authors.

3. UNDERSTANDING COPYRIGHT, PLAGIARISM, AND DIGITAL ASSET PROTECTION

While often used interchangeably, copyright infringement and plagiarism are distinct concepts with different implications:

Copyright Infringement

Copyright is a legal protection that grants creators exclusive rights to their original works. Copyright infringement occurs when someone uses copyrighted material without permission, regardless of whether they attribute the source. This is a **legal violation** with potential consequences including:

- Legal action and lawsuits from copyright holders
- Statutory damages ranging from \$750 to \$150,000 per work
- Cease-and-desist orders requiring immediate removal of content
- Court injunctions preventing future use
- Criminal prosecution in cases of willful infringement for commercial advantage

Plagiarism

Plagiarism is the act of presenting someone else's work, ideas, or words as your own without proper attribution. While plagiarism is primarily an **ethical violation** rather than a legal one, it can have serious consequences:

- Academic expulsion or failure in educational settings
- Termination of employment or professional contracts
- Damage to professional reputation and credibility
- Loss of trust from audiences, clients, or stakeholders
- Potential copyright infringement if the plagiarized content is also copyrighted

Why Digital Asset Protection Matters

In the digital age, your content is your currency. Whether it's blog posts, product descriptions, marketing materials, images, videos, or business documents, protecting these assets is essential for:

- **Brand Integrity:** Unauthorized use of your content can dilute brand messaging and confuse customers
- **Revenue Protection:** Stolen content can divert traffic, leads, and sales to competitors
- **SEO Performance:** Duplicate content can harm search engine rankings and visibility
- **Legal Compliance:** Ensuring your team doesn't inadvertently use copyrighted material protects against lawsuits
- **Competitive Advantage:** Original content establishes thought leadership and market differentiation

What Is Eligible for a Copyright?

The following works are eligible for a copyright:

- **All literary works:** These include short stories, poems, newspaper articles, blogs, plays, and reference materials.
- **Advertisements**
- **Architecture**
- **Artistic works:** These include drawings, paintings, pictures, and sculptures.
- **Technical Drawings**
- **Films**
- **Television shows**
- **Podcasts**
- **Choreography**
- **Musical compositions**
- **Concerts and other live performances**
- **Computer software**
- **Computer hardware**



4. COPYRIGHT LIMITATIONS AND EXEMPTIONS

Not all works are eligible for copyright protection. **U.S. copyright law** and **international agreements** recognize important **limitations** and **exemptions**, including:

- **Facts and Ideas** – Copyright protects expressions of ideas, not the ideas themselves.
- **Government Works** – Federal government publications and statutes are not copyrighted.
- **Short Phrases and Titles** – Common words, slogans, and titles are not protected.
- **Public Domain Works** – Works whose copyright has expired are free to use.

Additionally, **copyright exceptions** allow the use of copyrighted material without permission in certain circumstances, such as:

- **Educational Use** – Teachers and students may use copyrighted materials in specific educational settings.
- **Library and Archival Copies** – Libraries can reproduce works for preservation.
- **Disability Access** – Copyrighted materials may be adapted for visually impaired persons.

Which Protections Does a Copyright Give?

Think of a copyright as your ownership of something that you've created. Whether you take a picture, write a short story, or compose a piece of music, it's your work. A copyright gives you legal protection over that creation. As the copyright owner, only you have the right to:

- **Reproduce the Work:** You can make copies of the content you created. You may distribute your work as you see fit.
- **Create Other Works Based on the Original Work:** For example, you may want to combine a series of blog posts into a book.
- **Display the Work in Public:** When you create art, you may want others to look at it. Your painting, statue, or installation is yours to show wherever you like.
- **Ability to sell copies of your work:** You can profit from your copyrighted idea by selling it.
- **Perform the Work in Public:** When you write music, a book, a play, or anything else you can display in public, you have the right to do so. For example, you have the right to play your own music at a concert.

5. COMPARATIVE LEGAL ANALYSIS OF INTERNATIONAL COPYRIGHTABILITY STANDARD

The question of whether AI-generated works are copyrightable is a complex and evolving issue that is being addressed by courts and policymakers around the world. In the United States, for example, the Copyright Office has stated that copyright protection is available for works created by human authors, and that it does not register works produced by a machine or mere mechanical process that operates randomly or automatically.

- In the European Union, the Copyright Directive of 2019 provides that copyright protection is granted to works that are original, and that the author must be a natural person. The Directive acknowledges that AI may play a role in the creative process, but ultimately holds that AI generated works are not eligible for copyright protection unless they are "original in the sense that they are the author's own intellectual creation."
- Overall, the question of whether AI-generated works are copyrightable is a complex and evolving issue that requires a nuanced and contextual analysis. While Indian law currently does not explicitly address the copyright ability of AI-generated works, recent cases suggest that Indian courts are likely to require a degree of human intervention and creativity in order to confer copyright protection. At the same time, it is important for policymakers and stakeholders in India's creative industries to consider the implications of AI for copyright law and to develop appropriate legal frameworks that balance the interests of creators, users, and society as a whole.

Indian cases on liability for AI-generated works

There have not been any recent cases in India that specifically address the liability for copyright infringement by AI-generated works. However, a few cases have addressed the question of secondary liability in the context of online platforms that host user-generated content. In the case of MySpace Inc. v. Super Cassettes Industries Ltd., the Delhi High Court held that MySpace, a social networking platform, was not liable for copyright infringement by its users, as it had complied with the "safe harbor" provisions under Indian law. These provisions protect intermediaries from liability for user-generated content if they meet certain conditions, such as having a "notice and takedown" policy and not being involved in the creation or selection of the content.

Comparative legal analysis of international liability standards

The question of liability for copyright infringement by AI is a complex and evolving issue that is being addressed by courts and policymakers around the world. In the United States, for example, secondary liability for copyright infringement can arise under the doctrines of "vicarious liability" and "contributory infringement," as in India. However, U.S. law also



recognizes a third doctrine of "inducement liability," which arises when an entity intentionally induces or encourages infringing activity.

In the European Union, the liability of intermediaries for copyright infringement is governed by the E-Commerce Directive, which provides for a "hosting safe harbor" that shields intermediaries from liability for user-generated content if they meet certain conditions. The Directive also provides for a "mere conduit" exception that shields intermediaries from liability for the mere transmission of infringing content.

Overall, the question of liability for copyright infringement by AI raises a number of complex legal and policy issues that require careful consideration. While Indian law currently does not explicitly address the liability of AI for copyright infringement, recent cases suggest that Indian courts are likely to apply the existing doctrines of secondary liability in a manner that is consistent with international legal norms. At the same time, it is important for policymakers and stakeholders in India's creative industries to consider the implications of AI for liability standards and to develop appropriate legal frameworks that balance the interests of creators, users, and society as a whole.

Comparative Analysis of AI Impact on Copyright Law

Artificial Intelligence (AI) has transformed how creative works are produced, distributed, and consumed. Advanced systems developed by companies such as Open AI, Google, and Meta can generate text, images, music, and code that resemble human-created works.

This rapid development has significantly impacted copyright law across jurisdictions, raising new legal questions about authorship, ownership, infringement, liability, and fair use.

This analysis compares how AI is reshaping copyright law in the **United States, European Union, United Kingdom, and India.**

Major Ways AI Impacts Copyright Law

AI affects copyright law in four major areas:

1. **Training of AI using copyrighted works**
2. **Authorship of AI-generated content**
3. **Ownership and economic rights**
4. **Liability for infringement**
5. **Market impact on creative industries**

Comparative Jurisdictional Analysis

A. United States

Legal Framework:

- Copyright Act of 1976
- Fair Use Doctrine (Section 107)

1. AI Training and Fair Use

AI companies argue that training models on copyrighted data qualifies as **transformative fair use**. Courts examine:

- Purpose of use
- Nature of work
- Amount used
- Market effect

2. AI-Generated Works

The U.S. Copyright Office has clarified that:

- Only works with **human authorship** are copyrightable.
 - Purely AI-generated works are not protected.
- Impact in the U.S.
- Encourages AI innovation due to flexible fair use.
 - However, legal uncertainty remains high.
 - Strong litigation culture shaping future precedent.

B. European Union

Legal Framework:

- Copyright in the Digital Single Market Directive
 - 1. Text and Data Mining (TDM)
- Allows AI training for research purposes.



- Commercial TDM permitted unless rights holders opt out.
- Emphasizes transparency and creator consent.

2. Strong Moral Rights

EU law prioritizes:

- Author protection
 - Moral rights
 - Fair remuneration
- Impact in the EU
- Structured regulatory framework.
 - Greater protection for creators.
 - Higher compliance burden for AI developers.

C. United Kingdom

Legal Framework:

- Copyright, Designs and Patents Act 1988
 1. Computer-Generated Works

UK law uniquely provides that:

 - The author of computer-generated work is the person making arrangements for its creation.
 2. Policy Debate

The UK government proposed expanding data mining exceptions but faced opposition from creative industries.
- Impact in the UK
- Provides limited clarity on authorship.
 - Balances innovation and creative industry concerns.

D. India

Legal Framework:

- Copyright Act, 1957
 1. AI Authorship
 - Copyright granted to the “person who causes the work to be created.”
 - Ambiguity regarding whether AI fits within this framework.
 2. Lack of Specific AI Regulations
 - No clear statutory provisions addressing AI training.
 - Courts have not established strong precedent yet.
- Impact in India
- Legal uncertainty.
 - Growing AI industry without structured copyright reform.
 - Opportunity for legislative modernization.

Comparative Table

Issue	USA	EU	UK	India
AI Training	Fair Use	TDM exception	Limited exception	No clear rule
AI Authorship Protection for AI Works	Human required	Human-centric	Arranger recognized	Ambiguous
Protection for AI Works	Not protected if fully AI	Limited	Recognized (conditional)	Unclear
Regulatory Clarity	Moderate	High	Moderate	Low

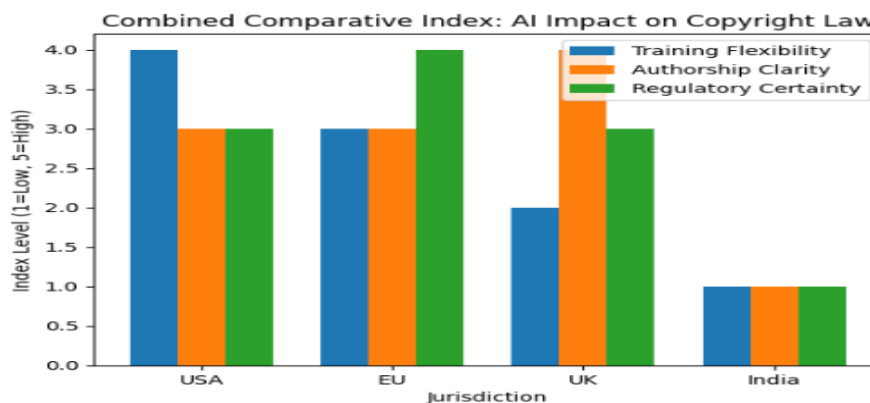


Fig.1 GRAPHICAL DATA OF Comparative analysis of AI IMPACT ON COPYRIGHT LAW



6.CASE STUDY ON AI-GENERATED WORK VIS-À-VIS COPYRIGHT PROTECTION

The use of generative AI tools is on the rise in the world. Students, academicians, professionals in the corporate sector, artists, writers, and many other people are using generative AI tools for generating work. As the world of generative AI is new, there is not much clarity about copyright protection and ownership of work generated by AI tools. However, there have been a few cases of copyright registration of AI-generated work. United States of America The United States Copyright Office had recently granted copyright protection to a graphic novel “Zarya of the Dawn”. However, Kris Kashtanova, the author, did not disclose before the Copyright Office that the images used in the novel were produced by using Mid journey, a generative AI tool. When the Copyright Office became aware of her statements made on social media that images used in the novel were generated by the Mid journey, the Office wrote a letter to her seeking additional information about the novel. Based on her reply, the Copyright Office, taking cognizance of images generated by AI tool, cancelled the copyright registration of images in the novel as they were not the product of human authorship. Therefore, copyright protection for the text and arrangement of images still subsisted, but protection for the individual images within the graphic novel was denied by the Copyright Office. Stephen Thaler, who is known for attempting to obtain patents in various countries for an invention by claiming AI as its inventor, sought copyright registration of artistic work wherein he listed “Creativity Machine” as the author of the work which was an AI computer program developed and owned by him. The Copyright Office rejected the application for copyright protection to the AI-generated two dimensional artwork on the ground that the work lacked human authorship necessary to support a copyright claim, noting that copyright law only extends to work created by human beings. Mr. Thaler requested reconsideration, but the Copyright Office maintained its status quo on the rejection. He made a second request for reconsideration wherein the US Copyright Office Review Board affirmed the denial of registration in February 2022 while agreeing that copyright MISHRA & SINGH: AI-GENERATED WORK IMPLICATIONS ON COPYRIGHT LAW protection does not extend to the creations of non human entities and reiterated that a work meets the legal and formal requirements of copyright protection only if it is created by a human author. Mr. Thaler appealed in the United States District Court against the ruling of the United States Copyright Office Review Board. However, after the strict view of the US Copyright Office and its Review Board, the United States District Court, Columbia also took the same view and denied the copyright registration of AI-generated pictures. The Court upheld the refusal by the Copyright Office and its Review Board by observing that Copyright has never stretched so far to protect work generated by new forms of technology operating absent any guiding human hand. As per the Court, human authorship is a bedrock requirement of copyright. Thus, AI has failed to be recognised as an author for the work created by it. United Kingdom and European Union The European Union has added new provisions in the proposed AI Act which mandates generative AI tools, like ChatGPT, to disclose copyrighted materials that have been used to develop them. Whereas, the UK Intellectual Property Office is taking a wait and-watch approach as it has no plan to make changes in the law for computer-generated work. However, it has introduced a new copyright and database exception which allows text and data mining (TDM) for any purpose. India In India, though there is a rumour that the Copyright Office has registered an AI-generated poem in 2021 under the name of “AI-dada” as the author. However, there is no confirmation on the same as per the search conducted on the website of the Copyright Office by the authors of this paper. The Copyright Office or Judiciary is yet to witness any application or litigation respectively, wherein any AI tool has been claimed as an author or any human author has attempted to register copyright in any AI-generated work. In view of the above case studies, it is to be noted that only humans are being granted authorial rights in work created by them. However, no right is being granted in AI-generated work to humans or any other entity including AI-tool or upstream contributors. The USA has categorically denied to grant copyright to humans in any AI-generated work. UK and India, though, are yet to witness any application for grant of copyright in AI-generated work, do not plan to make changes in the law for AI generated work. Considering the above analysis and supporting case laws in this regard, AI-generated work is being treated for the time being as non copyrighted, copy-left, or copyright-free work, particularly because it is not clear whether copyright law across all the jurisdictions explicitly requires the author of a creative work to be human.⁵⁰ Therefore, there is a long way to go for granting authorial rights in AI-generated work. Impact of AI-Generated Work on Indian Copyright Regime AI and AI-generated work will have significant impacts on the Indian copyright regime in the coming days. Similar cases, as mentioned above, may also arise in India. Therefore, among numerous challenges, the first challenge pertains to defining the ‘copyright ability’ of the AI-generated work, that is, whether the work generated by AI tools like ChatGPT, DeepAI and Midjourney is copyrightable? In this context, another challenge is to lay down the conditions for copyright ability of AI-generated work, that is, what shall be the extent of human intervention, originality and/or modicum of creativity required in the creation of such work for being considered copyrightable? Further, if AI-generated work is copyrightable, another hurdle is to define the authorship and copyright ownership of such AI-generated work, i.e., who shall be the copyright owner and author of AI generated work, whether it shall be users or upstream contributors such as developer/programmer, trainer, designer, or data supplier. Another significant aspect is the concerns of copyright owners who see AI



tools training on huge amounts of their work and thus replicating their style and/or work. In January 2023, Getty Images sued AI company Stability AI for training on millions of its pictures without consent and various artists also expressed similar concerns against the same company. Therefore, similar cases may arise in India as well wherein data of Indians might have been used or be in use for the TDM process to generate work. In Europe, TDM is allowed and does not constitute copyright infringement if performed within the legal framework in place, but copyright holders can opt out of it and refuse TDM on their contents. However, no such framework exists in India wherein copyright owners can opt-out of the TDM process and stop AI tools like ChatGPT from using their copyrighted work to generate work. It is pertinent to note that OpenAI, the owner of ChatGPT, was about to be sued by an Australian mayor in a defamation lawsuit for ChatGPT content wherein it made false claims that he had served time in prison for bribery. Therefore, another major challenge is to define the liability of users and AI tool owners in case of copyright infringement and defamation resulting from the work generated by AI tools. AI generated work will have a significant impact on copyright law in numerous ways as highlighted above.

7.CONCLUSION

In this research paper, we have explored the intersection of AI and copyright law in the Indian context. We have provided an overview of the legal framework for copyright in India, as well as the key features of AI technologies and their implications for copyright law. Through an analysis of recent Indian cases and comparative legal analysis, we have identified key challenges and opportunities for the copyright system in India, particularly around issues of copyright ability and liability for AI-generated works.

Our research has highlighted the need for greater clarity and guidance on the copyright ability of AI-generated works and the ownership of such works. We have also identified the need for ethical and regulatory guidelines to ensure that AI is used in a responsible and transparent manner in creative industries. FAI is not merely challenging copyright law—it is reshaping it. The United States favors innovation through fair use flexibility. The European Union emphasizes creator protection and regulatory clarity. The United Kingdom offers limited statutory recognition of computer-generated works, while India remains in an early stage of legal adaptation. The comparative analysis reveals that copyright law worldwide is struggling to adapt to rapid AI advancement. While the United States relies heavily on fair use flexibility, the European Union has introduced structured exceptions. The United Kingdom recognizes computer-generated works, and India remains legally ambiguous. A globally harmonized approach may be necessary to ensure both innovation and protection. Future reforms must clearly define authorship, training data rights, and liability standards to avoid prolonged legal uncertainty in the AI era.

8.REFERENCE

- [1] Kariyawasam K, Artificial intelligence and challenges for Copyright Law, Oxford's International Journal of Law and Information Technology, 28280 (2020), <https://academic.oup.com/ijlit/article/28/4/279/6220289>.
- [2] Shtefan A, Creativity and artificial intelligence: A view from the perspective of copyright, Oxford's Journal of Intellectual Property Law & Practice,
- [3] Indian Copyright Office, Practice and Procedure Manual, 2018, Microsoft Word - JIPR-209 corrected proof
- [4] Mukherjee S, EU proposes new copyright rules for generative AI, Reuters, Chaudhary G, Artificial intelligence: Copyright and authorship/ownership dilemma? Indian Journal of Law and Justice, 13 (2022)
- [5] The evolution of AI-generated content, available at: <https://aicontentfy.com/en/blog/evolution-of-ai-generated-content>