



24 November 2025

Intellectual Property Office
Concept House
Cardiff Road
Newport
South Wales
NP10 8QQ
United Kingdom

Submitted via email: designsconsultation@ipo.gov.uk

Re: Consultation on changes to the UK designs framework

Dear United Kingdom Intellectual Property Office:

Intellectual Property Owners Association (IPO) appreciates the opportunity to respond to the “Consultation on changes to the UK designs framework.”

IPO is an international trade association representing a “big tent” of diverse companies, law firms, service providers, and individuals in all industries and fields of technology that own, or are interested in, intellectual property rights. IPO membership includes over 125 companies and spans over 30 countries. IPO advocates for effective and affordable IP ownership rights and offers a wide array of services, including supporting member interests relating to legislative and international issues; analyzing current IP issues; providing information and educational services; supporting and advocating for an IP system that enables innovation and creativity; and disseminating information to the public on the importance of IP rights. IPO’s vision is the global acceleration of innovation, creativity, and investment necessary to improve lives.

IPO appreciates and supports the goal of improving and simplifying the United Kingdom (UK) designs system. Given the growing global importance of industrial designs, IPO suggests that the UK take steps to harmonize the UK designs system with the EUIPO designs system. For example:

- Harmonization of the deferment period would be particularly helpful as it is challenging to manage having two different deferment lengths and the longer deferment period is often desirable to design owners.
- IPO supports making it clear that animations and transitional designs can be registered in their own right, harmonizing with the recent updates to the EUIPO system.
- IPO also supports the UK joining the DAS system for designs, again to help harmonize with the EU and ease the burden on Applicants for retrieving priority documents.

In conjunction with the above recommendations, the IPO supports a system where bad faith filings are addressed expeditiously, for example by empowering the UK design

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registry to investigate and object to bad faith filings, alongside adding a limited post-registration system for third parties to object to bad faith filings.

IPO thanks you for your attention to IPO's comments submitted herein and welcomes further dialogue and opportunity to provide additional comments.

Sincerely,

A handwritten signature in black ink that reads "Krish Gupta". The signature is written in a cursive, flowing style.

Krish Gupta
President