**NUJ comment submission to the Competition and Markets Authority’s Getty Images/ Shutterstock merger inquiry.**

**July 2025**

The National Union of Journalists (NUJ) is the voice for journalism and journalists in the UK and Ireland. It was founded in 1907 and has more than 22,000 members working in broadcasting, newspapers, news agencies, magazines, book publishing, public relations, photography, videography and digital media.

The union has a Photographers’ council that represents the interests of video and photojournalists. We welcome the opportunity to comment in this inquiry.

Following the announcement of the proposed Getty/Shutterstock merger in January 2025, the NUJ sought assurances from Getty over the possible impact of plans on photographers and their ability to oppose the use of their content in the training and development of artificial intelligence.

The union wrote to Craig Peters, Getty CEO and subsequently met with him, where he confirmed Getty does not permit customers to alter editorial content or allow the training of generative AI models on editorial content. Peters also confirmed that AI-generated images are not allowed to be submitted to their image library. Despite the fast-paced nature of artificial intelligence developments, it is our understanding given assurances made, that Getty’s leadership will remain steadfast in this position. There are clear threats posed to public confidence and trust in the photojournalism that plays an important role in news reporting, should this change.

NUJ members hold broader concerns too, about whether there will be cuts to royalties received, should the merger proceed. It is clear there will be a shift in the media landscape with greater power for the companies and a reduction in media plurality. The NUJ’s longstanding position on the need for far greater plurality and diversity in the UK’s journalistic landscape is a matter of public record. We are acutely aware of the financial difficulties visual journalists continue to face due to the failure of companies to offer fair rates and commissions. The union has impressed upon Peters that journalists should not be subject to cost-cutting efforts as part of a merger and that there must be recognition of the impact of stagnant rates on livelihoods, followed by action to address this. We are aware that with mergers can come changes in operating and governance structures, accompanied by competing priorities. However, an inability to recognise the importance of fair rates that rise to keep up with living costs, is a disservice to the talented journalists that have thus far contributed to the company’s success.

The merger will lead to a reduction in the number of agencies photographers can place their work with, resulting in a loss of income. This is of significant concern to NUJ members, and with a large freelance population within visual journalism, there is often a disproportionate imbalance regarding access to resources this skilled and talented workforce have, when compared to larger companies. As Getty and Shutterstock pursue the $3.7bn merger, we stress there must be consideration given to the expertise from visual journalists that contributes greatly to our media landscape. The creative industries is a sector valued at £125bn according to the UK government and if threats are uncovered to the sustainability of sub-sectors including photographers, these should be sufficiently scrutinised.

The union has indicated no approval of the proposed acquisition. We believe due regard must be given to the sustainability of careers.